

APPENDIX F
OPERATIONS, MAINTENANCE, AND
MONITORING PLAN

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LIST OF ACRONYMS AND ABBREVIATIONS

µg/kg	micrograms per kilogram
CAP	<i>Cleanup Action Plan</i>
CD	Consent Decree
cm	centimeter
CoC	chemical of concern
cPAH	carcinogenic polycyclic aromatic hydrocarbon
CQAP	<i>Construction Quality Assurance Plan</i>
Ecology	Washington State Department of Ecology
EDR	<i>Engineering Design Report</i>
EMNR	enhanced monitored natural recovery
MLLW	mean lower low water
MNR	monitored natural recovery
MTCA	Model Toxics Control Act
ng/kg	nanograms per kilogram
OMMP	<i>Operations, Maintenance, and Monitoring Plan</i>
PR/OPG	Pope Resources, LP/OPG Properties, LLC
QA	quality assurance
QAPP	<i>Quality Assurance Project Plan</i>
QC	quality control
RI/FS	remedial investigation/feasibility study
SAP	<i>Sampling and Analysis Plan</i>
SMA	sediment management area
SMS	Sediment Management Standards
SRZ	sediment recovery zone
SWAC	surface weighted average concentration
TEQ	toxicity equivalent quotient
WAC	Washington Administrative Code

1 INTRODUCTION

This *Operations, Maintenance, and Monitoring Plan* (OMMP) describes long-term monitoring and adaptive management of engineered caps in Port Gamble Bay (“Site”; Figure F-1) to ensure their long-term integrity and protectiveness, and also describes long-term monitoring to document recovery over time of sediments throughout the Site. This OMMP builds on the accompanying *Engineering Design Report* (EDR), which describes the approach and criteria for the engineering design of sediment cleanup actions at the Site, as set forth in the *Final Cleanup Action Plan* (CAP; Ecology 2013), and in accordance with the requirements of Consent Decree (CD) 13-2-02720-0 between the Washington State Department of Ecology (Ecology) and Pope Resources, LP/OPG Properties, LLC (PR/OPG), entered in December 2013. The actions described in this OMMP will be performed by PR/OPG under Ecology oversight, consistent with CD requirements.

Implementation of this OMMP will be performed consistent with the requirements of the Model Toxics Control Act (MTCA), Chapter 70.105D in the Revised Code of Washington, as administered by Ecology under the MTCA Cleanup Regulation, Chapter 173-340 of the Washington Administrative Code (WAC). Implementation of this OMMP will also comply with the Sediment Management Standards (SMS) Chapter 173-204 WAC.

1.1 Purpose and Scope of the OMMP

As described in the EDR, engineered caps will be placed over approximately 10 acres of the Site, and clean silt/sand enhanced monitored natural recovery (EMNR) layers will be placed over an additional approximately 68 acres to address thin deposits of relatively low concentration sediment as well as dredging residuals. Capping and EMNR placement is anticipated to be conducted over two construction seasons, beginning in fall 2015 and continuing into early 2017. The anticipated extent of remedial actions in sediment management areas (SMAs) at the Site is shown in Figure F-2.

Long-term monitoring of engineered caps installed in SMA-1 and SMA-2 will be performed to ensure their long-term integrity and protectiveness. However, EMNR layers (placed either as the primary remedy or as a post-dredge residuals management technique) do not require long-term monitoring or maintenance, consistent with CAP requirements.

As described in more detail in Section 3, the long-term monitoring of engineered caps will primarily include physical survey methods (e.g., bathymetry) to monitor the integrity, surface elevation, and thickness of the caps, beginning in Year 1 following completion of construction (cap monitoring is currently targeted to begin in 2018, continuing in Year 3 (2020), and then approximately every 5 years thereafter through 2030. Focused follow-on chemical and/or biological monitoring may be performed in targeted cap areas identified by the physical surveys to further evaluate the protectiveness of the caps. Cap repairs will be performed as needed based on the results of the monitoring. The need for and scope of long-term cap monitoring and maintenance beyond 2030 will be developed as a collaborative effort between PR/OPG and Ecology based on the results of monitoring through 2030, and may be triggered by specific storm or seismic events (e.g., a wind event with a recurrence interval of 20 years or more).

As discussed in the CAP, monitored natural recovery (MNR) is the selected remedy throughout SMA-5. Natural recovery processes are expected to result in a reduction of surface sediment concentrations throughout SMA-5 over time, particularly after ongoing sources such as decaying creosote-treated piles are removed during the remedial action. Recovery of surface sediments will be monitored after completion of remedial construction, and will continue as needed, as discussed in Section 4. A mathematical model has been developed as an evaluation tool for the MNR remedy; the model has been used to integrate Site data and forecast timeframes over which Site-wide average surface sediment concentrations will achieve sediment cleanup standards. The model can also be used as tool to evaluate progress based on future monitoring data.

Long-term performance and confirmation monitoring activities will inform Ecology's 5-year reviews of the effectiveness of remedial actions at the Site, consistent with MTCA and SMS requirements. Sampling events will be scheduled to facilitate Ecology's 5-year reviews, beginning in approximately 2020.

Subsequent sections of this OMMP describe post-construction environmental monitoring activities that will be performed at the Site, including the details of post-construction monitoring and maintenance of capped areas to ensure the cap remains physically stable and chemically protective over time, as well as long-term surface sediment monitoring to verify

that cleanup actions accelerate natural recovery processes. The overall objective of this OMMP is to confirm that remedial actions at the Site achieve the performance standards specified in the CAP.

1.2 Organization of the OMMP

The remainder of this OMMP is organized as follows:

- Section 2 – Project Roles and Responsibilities
- Section 3 – Cap Monitoring and Potential Corrective Actions
- Section 4 – Natural Recovery Sediment Quality Evaluation and Monitoring
- Section 5 – Reporting
- Section 6 – References

The accompanying *Sampling and Analysis Plan* (SAP; Attachment F-1) and *Quality Assurance Project Plan* (QAPP; Attachment F-2) specify procedures to ensure that sample collection, handling, and analysis will result in data of sufficient quality to evaluate the effectiveness of remedial actions at the Site.

2 PROJECT ROLES AND RESPONSIBILITIES

2.1 Washington State Department of Ecology

Ecology is the regulatory authority and responsible agency for overseeing and authorizing the remedial action. In this capacity, Ecology reviews monitoring plans developed during the remedial design phase and will review information described in this OMMP to ensure that the project is constructed in a manner consistent with the remedial design. Russ McMillan has been designated as the Ecology site manager to exercise project oversight for Ecology and to coordinate with PR/OPG. Ecology will make final decisions to resolve unforeseen problems, which may change the project components, or the manner in which the OMMP is undertaken.

2.2 Pope Resources, LP/OPG Properties, LLC

The operation, maintenance, and monitoring work on this project will be managed by PR/OPG and executed by PR/OPG or by one or more consultants specializing in this work. The Project Coordinator for PR/OPG is Clay Patmont of Anchor QEA, who will be responsible for implementation of the OMMP, including required monitoring, sampling, testing, and reporting. Included within this responsibility will be the monitoring or quality control (QC) activities to ensure that activities described in this OMMP are conducted in accordance with the requirements described herein. These activities may also be assigned to other consultants with the requisite expertise and experience.

3 CAP MONITORING AND POTENTIAL CORRECTIVE ACTIONS

Long-term cap monitoring in SMA-1 and SMA-2 will encompass two broad categories:

- Physical integrity performance monitoring (Section 3.1)
- Sediment quality confirmation monitoring (Section 3.2)

Physical integrity monitoring will be conducted visually or by using a high-resolution hydrographic survey (i.e., multi-beam bathymetric survey) conducted at the start of each OMMP monitoring event. The bathymetric survey data will be used to evaluate cap thicknesses by comparing the measured surface elevation of the cap with the final as-built survey described in the *Construction Quality Assurance Plan* (CQAP; Appendix E of the accompanying EDR). Based on the results of the survey, cap areas of relatively greater erosion or settlement will be targeted as locations to conduct follow-on sediment quality monitoring, as needed. Visual inspections of the caps, at low tide and/or by divers, may also be required to further detail the physical integrity of the caps and locate potential follow-on sediment core sampling locations, as necessary.

Surface sediment quality monitoring will be conducted at designated sentinel sampling stations on the SMA-1 and SMA-2 caps. Additional surface sediment sampling stations will be selected following completion and interpretation of the hydrographic survey and/or follow-on sediment core sampling, as described below.

3.1 Physical Integrity Performance Monitoring

Following the initial post-construction (as-built) surveys of engineered cap areas as described in the CQAP, long-term OMMP monitoring of the capping areas will be performed, including bathymetric surveys of SMA-1 and SMA-2 cap areas (Figure F-2). Bathymetric surveys will cover areas deeper than approximately +0 feet mean lower low water (MLLW), while intertidal areas above +0 feet MLLW will be surveyed “in the dry” using upland topographic surveying methods. The final cap areas will be delineated in as-built construction drawings to be provided by the contractor after remedial actions are completed. SMA-1 and SMA-2 cap areas are preliminarily depicted in Figures F-3 and F-4, respectively.

Post-construction bathymetric surveys will begin in Year 1 following completion of construction (cap monitoring is currently targeted to begin in 2018), continuing in Year 3 (2020), and then approximately every 5 years thereafter through 2030. As discussed above, the need for and scope of long-term cap monitoring beyond 2030 will be developed as a collaborative effort between PR/OPG and Ecology based on the results of monitoring through 2030, and may be triggered by specific storm or seismic events (e.g., a wind event with a recurrence interval of 20 years or more).

Survey methods will be similar between the as-built and each long-term monitoring survey to allow detailed comparisons. Changes in bathymetry will be evaluated to identify areas of net settlement, erosion, or deposition relative to post-construction conditions. A potential cap area of concern for potential settlement or erosion will be identified when the apparent total cap thickness relative to as-built conditions is less than the minimum specification defined in the EDR for the specific cap area. A potential cap area of concern may trigger visual inspection of the cap surface (Section 3.1.2) and/or sediment sampling in that area to more accurately characterize (through coring) the in-place cap layer thicknesses (Section 3.1.3).

3.1.1 Bathymetric Survey Methods

Bathymetric surveying will be used during construction to verify that the target thicknesses of the engineered caps in SMA-1 and SMA-2, as defined in the EDR, have been achieved at the completion of construction activities. Multi-beam bathymetric surveys will be performed, using the same surveying transects to the extent practicable, as part of long-term monitoring to identify changes in mudline elevations. Multi-beam surveys will be conducted by a licensed surveyor and will meet or exceed the accuracy standards for a USACE Navigation and Dredging Support Survey as referenced in the USACE Hydrographic Survey Manual, April 2004 Revision (USACE 2004). Additional details about bathymetric surveys are defined in the accompanying SAP in Attachment F-1.

3.1.2 Topographic Survey and Cap Surface Visual Inspection Methods

For intertidal cap areas not included in the bathymetric survey, both an upland topographic survey and concurrent visual inspection will be performed to evaluate the integrity of caps

relative to as-built post-construction conditions. Topographic surveys will be performed using established control points as part of long-term monitoring to identify changes in shoreline sloping cap elevations. Topographic surveys will be conducted by a licensed surveyor and will meet or exceed the accuracy standards for a USACE Total Station Topographic Survey as referenced in the USACE Control and Topographic Surveying Manual (USACE 2007). Additional details about upland topographic surveys are defined in the accompanying SAP in Attachment F-1. Concurrent with the topographic survey, cap inspections will be performed at low tide and/or by a diver to further detail the physical integrity of the armored areas and toe of armored slope. Inspections shall include documentation of each of the following:

- Description of the cap surface conditions
- Indications of settlement, seepage, or other unanticipated conditions
- Sediment core locations may also be identified as necessary to more accurately characterize the in-place layer thickness

3.1.3 Sediment Coring Methods

Sediment cores may be performed at locations identified in the bathymetric/topographic surveys or inspections where possible cap settlement and/or erosion of cap thicknesses are below the EDR-defined cap design criteria. If necessary, cores will be advanced to a minimum depth of approximately 1 foot below the minimum required cap thickness. The cores will be processed in the uplands and visually inspected to determine the thicknesses of the cap material.

If the coring verifies the cap thickness specification in that area (e.g., reductions in cap surface elevations are primarily attributable to sub-grade settlement), no further cap monitoring in that area will be required during that event. Conversely, if the coring reveals that cap thickness specifications in that area have not been maintained, additional contingency evaluations—including surface sediment chemistry, and/or bioassay analyses, and/or cap maintenance or repair—may be performed as appropriate, subject to Ecology approval (see Section 3.2).

Detailed procedures for field sampling, location control, sample handling, and decontamination are provided in the accompanying SAP (Attachment F-1). Detailed field and laboratory quality assurance (QA) and QC criteria, including method specifications, detection limits, accuracy and precision requirements, are provided in the accompanying QAPP (Attachment F-2).

3.2 Sediment Quality Confirmation Monitoring

As discussed above, surface sediment quality monitoring will be conducted at six designated sentinel intertidal and subtidal sampling stations composed of 5-point aliquots on the SMA-1 and SMA-2 caps, as depicted in Figures F-3 and F-4, respectively. Samples will be collected from the 0- to 10-centimeter (cm) biologically active zone. SMS larval bioassays and analyses of Site chemicals of concern (CoCs; including carcinogenic polycyclic aromatic hydrocarbons [cPAHs], dioxins/furans, and cadmium) will be performed on all six intertidal and subtidal surface sediment samples.

Additional targeted surface sediment sampling may be performed following completion and interpretation of the bathymetric/topographic surveys and/or follow-on core sampling (see Section 3.1). The decision on whether to collect and analyze additional surface grab samples and/or sediment core samples in these area, along with the specific bioassay and/or chemical analyses, will be a collaborative decision made by PR/OPG and Ecology based on field observations.

If the larval bioassay and chemical analyses confirm that cleanup standards are being maintained, then no further cap monitoring and/or repair in that area will be required during that event. Conversely, if the larval bioassay and/or chemical analyses reveal that cleanup standards may be exceeded, further focused monitoring and/or cap maintenance/repair will be performed as appropriate (Section 3.3), subject to Ecology approval.

3.2.1 Sediment Sampling and Analysis Methods

Surface sediment samples from each sample location shown in Figure F-3 and Figure F-4 will be composed of aliquots as discussed in Attachment F-1. The sample aliquots will be

collected using a van Veen grab sampler or equivalent deployed from a winch line on a sampling vessel. The sediment samples collected will be 5-point aliquots composited in the intertidal and subtidal areas and submitted for larval bioassays and chemical analyses. Detailed procedures for field sampling, location control, sample handling, and decontamination are provided in the SAP and QAPP included in Attachments F-1 and F-2, respectively.

3.3 Corrective Actions

In the event that monitoring indicates that remedial action performance standards may not be achieved, PR/OPG will submit recommendations for further monitoring or corrective actions to Ecology for review, consistent with the requirements described in the CD and CAP. While bioassay standards are applied on a sample composite basis, chemical criteria (i.e., for cPAHs, dioxins/furans and cadmium) will be applied as a surface weighted average concentration (SWAC) across the entire 700-acre Site defined in the CAP and CD, consistent with SMS requirements. Chemical monitoring data collected in all SMAs (see Section 4.3) will be used to calculate the SWAC.

If monitoring data reveal that cap performance standards are not being achieved, a response plan will describe additional response actions to be taken to ensure the successful performance of the work. In conjunction with Ecology, PR/OPG will evaluate the extent and significance of the exceedance or trigger. The need for additional response actions will take into consideration all monitoring results relative to an overall assessment of the successful performance of the remedial action. Through these discussions, an appropriate course of action will be developed and implemented, as necessary. The specific problem causing the need for a contingency will dictate which additional response actions may be most appropriate. Possible additional response actions may include, but are not limited to, those listed for the following scenarios:

- Erosion of cap material
 - Perform additional monitoring to further assess erosion and to determine the extent, cause, and potential solution to the verified erosion
 - Perform additional sediment quality sampling within those erosion areas where there may be a potential for underlying material to be exposed

- Discuss operations that might contribute to erosion and modifications to these operations that may be required to maintain remedy effectiveness
- Place additional material with less erosion potential to supplement caps
- Sediment cleanup standard exceedance
 - Conduct confirmation biological sediment toxicity testing to confirm or refute the occurrence of adverse ecological impacts
 - Conduct a source control evaluation in coordination with Ecology (as necessary)
 - Place additional capping material

4 NATURAL RECOVERY SEDIMENT QUALITY EVALUATION AND MONITORING

As discussed in the CAP (Ecology 2013), subsurface sediment cleanup levels must be achieved 10 years after completion of remedial construction. Since construction is likely to be completed in 2017, cleanup standards are targeted to be achieved by 2027. The point of compliance for Site human health CoCs including cPAH toxicity equivalent quotient (TEQ), dioxin/furan TEQ, and cadmium is the SWAC over all subtidal areas of the Site (730 acres, including all SMAs; Figure F-1) across the 0- to 10-cm depth interval.

Long-term monitoring of surface sediment quality will be conducted as part of this OMMP to verify that natural recovery processes at the Site continue during the 10-year post-construction period to achieve sediment cleanup standards described in the CAP. Recovery of surface sediments at sentinel monitoring locations throughout the Site will be monitored beginning approximately 3 years after completion of remedial construction (long-term monitoring is currently targeted to begin in 2020) and every 5 years thereafter as needed (see Section 4.3). Baseline sampling data, natural recovery modeling, sediment sampling/analysis methods, and potential corrective actions are discussed in Sections 4.1 through 4.4.

4.1 Baseline Sampling

The remedial investigation/feasibility study (RI/FS; Ecology 2012) that formed the basis for the CAP (Ecology 2013) included extensive sampling and analysis of surface sediment CoCs throughout the Site, and thus forms the primary baseline data set for this OMMP evaluation. Most of the surface sediment baseline data were collected between 2008 and 2011 (average 2010). Baseline (2010) surface sediment cPAH and dioxin/furan TEQs are depicted in Figures F-5 and F-6, respectively. The baseline cPAH and dioxin/furan TEQ SWACs are approximately 42 µg/kg (see Section 4.2.2; above the 16 µg/kg cleanup level) and 3 nanograms per kilogram (ng/kg; below the 5 ng/kg cleanup level), respectively. (As discussed in the CAP, the baseline surface sediment cadmium SWAC is also below the cleanup level of 3 milligrams per kilogram.)

The RI/FS (Ecology 2012) also included baseline radioisotope analyses to characterize net sedimentation rates and mixing layer thicknesses in Port Gamble Bay. Representative sediment cores from central Port Gamble Bay are depicted in Figure F-7, and are consistent

with recent (last 20 years) net sedimentation rates ranging from approximately 0.40 to 0.48 cm per year. The radioisotope gradients within these cores also reveal that there is relatively little sediment mixing in the 0- to 10-cm layer.

Consistent with the Ecology-approved SAP, additional surface sediment data were collected in 2014 at six representative stations across the Site to provide an early indication of recovery and to obtain data to refine model projections (see Section 4.2). Surface sediment was sectioned into 0- to 2-cm and 2- to 10-cm sub-sampling intervals, and analyzed using the same cPAH, dioxin/furan, and cadmium analytical methods used in the RI/FS. The 2014 data are summarized in Table F-1.

In areas of Port Gamble Bay that contain higher cPAH TEQs, the 0- to 2-cm layer contained significantly lower concentrations than underlying sediments, indicative of recent cPAH source controls and natural recovery processes (Figure F-8). Consistent with the radioisotope data summarized in Figure F-7, cPAH gradients within these surface sediments confirm that there is relatively little sediment mixing in the 0- to 10-cm layer. The Figure F-8 regression relationship (y-axis intercept) also suggests that current cPAH TEQs in depositing sediment at the Site likely range from approximately 5 to 10 $\mu\text{g}/\text{kg}$. As discussed in Section 4.2, the 2014 cPAH data were used to refine model inputs of cPAH natural recovery. The 2014 data also further verify that the current dioxin/furan TEQ and cadmium SWACs are below cleanup levels.

4.2 Natural Recovery Modeling

A mathematical model of sediment natural recovery was developed as an evaluation tool for the Site. The theoretical basis and framework for the model, the data and input parameters used in the model, and the results from the model predictions (i.e., timeframes over which the Site-wide SWAC will achieve the cPAH TEQ sediment cleanup standard) are presented in the subsections that follow.

4.2.1 Model Framework

Use of mathematical models to project future conditions for MNR evaluations is recommended in the U.S. Environmental Protection Agency's contaminated sediment

guidance (USEPA 2005) and in various technical support documents (e.g., Magar et al. 2009). The goal of such modeling is to project changes in surface sediment concentration over time resulting from new deposition of material with lower concentration than the existing surface, as well as other processes that can result in concentration reductions, such as dilution and dispersion.

Several models are available for MNR projections, ranging in complexity and calculation methods. Most MNR models use a one-dimensional framework to simulate concentration changes in the surface sediment layer over depth and time, as a function of deposition as well as other recovery processes including bioturbation (mixing), porewater diffusion/dispersion, and groundwater/porewater advection. Example models include RECOVERY (USACE 2001), Boudreau (1997), and AQFATE (Connolly et al. 2000; Arcadis et al. 2010). Given the relatively high sediment partition coefficients of cPAHs in Port Gamble Bay (see Appendix B of the EDR), deposition and bioturbation are the driving processes in these models; dissolved phase processes are negligible. Changes in the sediment surface layer concentration over time for a model driven by these two processes depend on the following parameters:

- Starting surface sediment concentration
- Concentration in depositing sediment
- Net sedimentation rate
- Depth and rate of bioturbation
- Averaging depth of the surface layer for compliance evaluation

For the limiting case of sediment natural recovery being driven by particulate phase processes (i.e., deposition and bioturbation), analytical solutions can be developed to simulate changes in surface concentration over time based on mass balance formulations. For example, two simplified cases that bound any other more complex case (including the numerical models described previously) are as follows:

1. **Complete mixing** within the entire surface sediment layer (i.e., mixing is instantaneous and complete over the entire depth of sediment being evaluated)
2. **No mixing**, in which the surface layer being evaluated contains layers of new (lower concentration) material that “build up” atop the existing (higher concentration) surface sediment, with no interaction between layers

The mathematical equations governing these two cases are discussed in basic environmental modeling textbooks (e.g., Chapra 1997). Conceptually, these two cases can be illustrated by the diagram shown in Figure F-9, and their associated behavior in terms of change in concentration over time is shown in Figure F-10 (for an example case of a starting surface sediment concentration of 25 $\mu\text{g}/\text{kg}$ with depositing sediment at a concentration of 10 $\mu\text{g}/\text{kg}$).

For the Port Gamble Bay analysis, concepts from these two bounding cases were combined to develop a modeling approach representative of the mixing regime observed at the Site. As discussed in Section 4.1, the lead-210 profile data from radionuclide cores (Figure F-7) and cPAH data from the 0- to 2-cm and 2- to 10-cm sections of sediment cores collected in 2014 (Figure F-8) indicate that there is relatively little mixing within the upper 10 cm of sediment. Thus, the MNR model developed for the Site consisted of a two-zone modeling approach to simulate the upper 10-cm compliance depth:

1. The 0- to 2-cm depth interval was assumed to be completely mixed. Mass entering the interval is a function of the rate of sediment deposition and concentration of depositing material, and mass exiting is based on the mixed concentration within the interval and the rate of deposition. The mass exiting from this 0- to 2-cm interval was used as input to the model simulation of the underlying 2- to 10-cm interval.
2. The 2- to 10-cm depth interval was assumed to have no mixing, and was discretized into computational layers. A LaGrangian solution scheme was applied in which the sediment exiting the 0- to 2-cm interval (having a concentration as per the first zone described above) via deposition was “reassigned” to the first discrete layer within the 2- to 10-cm interval, and all subsequent discrete layers within that interval were then “reassigned” to the next layer down. This process was repeated over time as new sediment continues to deposit on the surface, causing the sediments initially present within this interval of the model to be transported downward over time.

The cPAH concentrations simulated by the model were vertically averaged to calculate the 0- to 10-cm concentration for comparison to the Site cleanup standard of 16 $\mu\text{g}/\text{kg}$.

The basic model framework described above was applied to each SMA at the Site separately, and the anticipated timing of remediation activities within individual SMAs, including short-

term impacts associated with dredging (i.e., residuals), were incorporated into the model. The parameters used for the model, the approach used to simulate the effects of remediation within applicable SMAs, and the model results (i.e., predictions of the Site-wide SWAC) are described in Sections 4.2.2 and 4.2.3, respectively.

4.2.2 Model Input Parameters

Model input parameters were derived from Site sampling efforts described in previous sections. Key parameters in the model are the mixed layer depth, sedimentation rate, and cPAH TEQ in depositing sediment. These parameters and others used in the model are summarized in Table F-2 and are discussed in Sections 4.2.2.1 through 4.2.2.4.

4.2.2.1 Initial Surface Sediment cPAH Concentrations

The baseline surface sediment cPAH data collected from 2008 to 2011 were contoured using inverse-distance-weighting methods (see Figure F-5) and used to calculate the current SWAC within each SMA. These concentrations were used for the initial condition (specified to correspond to year 2010) in the model. The 2010 cPAH TEQ Site-wide subtidal sediment SWAC is approximately 42 µg/kg. SMA-specific SWACs were used in the modeling (Table F-2).

4.2.2.2 Remediation Effects on Surface Sediment Concentrations

Sediment concentrations in SMA-1 and SMA-2 were adjusted in the model to account for short-term increases in surface sediment cPAH concentrations resulting from dredging. Residuals from dredging in portions of the SMAs were conservatively assumed to affect the entire SMA. Based on dredging case studies summarized in Bridges et al. (2010), and given the volume of sediments to be dredged, the full 10-cm simulated thickness was assumed to be at the residual concentration immediately following dredging. The surface sediment cPAH concentration of the dredge residuals, and thus, the average surface sediment cPAH TEQ during dredging was set to 430 µg/kg, the average concentration within the SMA-1 and SMA-2 dredge prisms.

In addition, following the above-described increase in concentration associated with the dredge residuals, sediment concentrations were simulated in the model to reflect the post-

dredge placement of engineered sediment caps, and EMNR/residual management cover layers. For the purposes of modeling, it was assumed that the post-cap/cover surface sediment cPAH TEQ in SMA-1 and SMA-2 would be 8 µg/kg over the entire 10-cm simulated thickness, corresponding to one-half the cleanup standard. The same assumption was made for the simulation of the EMNR layer in SMA-3.

The specified timeframes of these concentration changes to represent active remediation in the model were as follows:

- **SMA-1:** Linear increase in concentration to 430 µg/kg cPAH TEQ applied from November 2016 to January 2017; linear decrease to a concentration of 8 µg/kg cPAH TEQ applied in January 2017
- **SMA-2:** Linear increase in concentration to 430 µg/kg cPAH TEQ applied from November 2015 to January 2016; linear decrease to a concentration of 8 µg/kg cPAH TEQ applied in January 2016
- **SMA-3:** Linear decrease to a concentration of 8 µg/kg cPAH TEQ in January 2017 (same timeframe as SMA-1)

4.2.2.3 *Net Sedimentation Rate*

Radioisotope analyses conducted as part of the baseline monitoring concluded that net sedimentation rates in Port Gamble Bay are in the range of 0.40 to 0.48 cm per year (Figure F-7). The model conservatively used a net sedimentation rate at the low end of that range (0.4 cm per year).

4.2.2.4 *cPAH Concentrations in Depositing Sediment*

As shown in Figure F-8, the regression between surface (0- to 2-cm) and subsurface (2- to 10-cm) sediment cPAH TEQ collected in 2014 suggests that concentrations in sediment depositing from the water column are in the range of 5 to 10 µg/kg. Supplemental watershed loading-based calculations based on regional measurements of diffuse non-point sources of cPAHs in regional stormwater for different land use classifications (Herrera 2011) produce depositing sediment cPAH concentration estimates in this same range, further corroborating this input concentration range. Modeling was conducted for the two cases bounding this depositing sediment cPAH TEQ range.

4.2.3 Model Results

Model simulations were performed for each SMA separately, incorporating the remediation schedule described in the previous subsection. These simulations were conducted for two scenarios: assuming 5 and 10 µg/kg cPAH TEQ in depositing sediment. Results of the modeling for each individual SMA are shown in Figure F-11 (5 µg/kg cPAH TEQ depositing sediment) and Figure F-12 (10 µg/kg cPAH TEQ depositing sediment). These graphics illustrate the likely effects of remediation and rate of recovery in each SMA. Because the point of compliance for the 16 µg/kg cPAH TEQ cleanup standard is the SWAC over all subtidal areas of the Site, the subtidal area results were calculated as a Site-wide SWAC based on the SMA-specific results in Figures F-11 and F-12 and respective SMA areas. Figure F-13 shows the predicted decline in the Site-wide SWAC for cPAH TEQ. Based on the simulated range of depositing sediment cPAH TEQ concentration (i.e., 5 and 10 µg/kg), the predicted Site-wide SWAC is anticipated to achieve the 16 µg/kg cPAH TEQ cleanup standard between approximately 2026 and 2029.

The model developed and presented herein will be refined as additional data become available from long-term monitoring of surface sediment quality conducted as part of this OMMP to verify that natural recovery is progressing towards the cleanup standard.

4.3 Sediment Sampling and Analysis Methods

To verify model predictions and document the rate of recovery following completion of sediment cleanup actions, surface sediment samples will be collected from 12 representative sediment monitoring locations throughout the Site: nine located in SMA-5, two in SMA-4, and one in SMA-3 (see Figure F-14). As discussed above, long-term monitoring will begin approximately 3 years after completion of remedial construction (monitoring is currently targeted to begin in 2020) and every 5 years thereafter as needed (see Section 4.4). The SMA-3 to SMA-5 data will be combined with data collected in SMA-1 and SMA-2 (see Sections 3 and 4.2.3) to calculate the SWAC over all subtidal areas of the Site.

Field and analytical techniques and procedures to be used in the long-term monitoring program will be consistent with those used in the CAP (and the 2014 monitoring program) to

ensure comparability of data. The accompanying SAP (Attachment F-1) and QAPP (Attachment F-2) specify procedures to ensure that sample collection, handling, and analysis will result in data of sufficient quality to evaluate the effectiveness of remedial actions at the Site.

4.4 Corrective Actions

The evaluation and implementation of corrective actions would be performed consistent with the requirements of the CD and CAP. Where monitored natural recovery does not achieve cleanup standards within 10 years following completion of remedial construction, PR/OPG will comply with sediment recovery zone (SRZ) requirements as defined under the SMS.

Following the first post-construction monitoring event (3 years after construction, anticipated in 2020), natural recovery modeling will be updated to refine projections of recovery through 2027. If the combined monitoring data in Year 3 post-construction (2020) and modeling projections summarized in Section 4.2 continue to confirm that the SWAC will be reduced to the 16 µg/kg cPAH TEQ cleanup standard by 2027, follow-on sediment recovery monitoring will be performed in Years 5 and 10 (2022 and 2027 respectively) to update and refine model projections.

Ecology will initiate a review of factors listed in SRZ criteria (WAC 173-204-590(3)) as part of a Focused Feasibility Study to evaluate remedial options including, but not limited to, implementation of a SRZ within 6 months after the first determination that the target of 16 µg/kg cPAH TEQ cleanup standard will not be met by 2027 (or 10 years after remediation). If the monitoring data indicate that MNR is not likely to achieve the cleanup level in this timeframe, the SRZ process will be initiated, including a Focused Feasibility Study for the Site including MNR and EMNR areas.

The Focused Feasibility Study will include but not be limited to the following:

- Consideration of further source controls, MNR, and EMNR to achieve cleanup standards
- Congener fingerprinting analysis to evaluate potential sources of cPAH, and to

understand whether additional source controls might be necessary to achieve the 16 µg/kg cPAH TEQ cleanup standard

5 REPORTING

Subsequent to each OMMP monitoring event described in the sections above, PR/OPG's Project Coordinator will submit a detailed report to Ecology outlining the actions taken and the results, which will include survey maps and chemical analysis data. A recommendation for further action will be described in detail if warranted.

6 REFERENCES

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TABLES

**Table F-1
Baseline Sediment Recovery Grab Sample Results**

	Task Location ID Sample ID Sample Date Depth Sample Type Matrix	2014RemedialDesign BW-01 BW-01-SG-0-2-140811 8/11/2014 0 to 2 cm N SE	2014RemedialDesign BW-01 BW-01-SG-2-10-140811 8/11/2014 2 to 10 cm N SE	2014RemedialDesign BW-01 BW-101-SG-2-10-140811 8/11/2014 2 to 10 cm FD SE	2014RemedialDesign BW-15 BW-15-SG-0-2-140811 8/11/2014 0 to 2 cm N SE	2014RemedialDesign BW-15 BW-15-SG-2-10-140811 8/11/2014 2 to 10 cm N SE	2014RemedialDesign BW-21 BW-21-SG-0-2-140811 8/11/2014 0 to 2 cm N SE	2014RemedialDesign Bw-21 BW-21-SG-2-10-140811 8/11/2014 2 to 10 cm N SE
	Site-specific Criteria							
Conventional Parameters (mg/kg)								
Total organic carbon		0.764	1.56	0.768	3.17	3.48	2.83	2.93
Total solids		63.97	71.42	69.69	24.5	29.21	20.38	24.3
Grain Size (%)								
Gravel		0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U
Sand, very coarse		0.2	0.2	0.2	0.1 U	0.7	0.2	0.1
Sand, coarse		2	2	2	1.4	1.7	6.6	0.2
Sand, medium		21.4	21.9	22.5	2.8	2	0.9	0.5
Sand, fine		56.4	56.7	56	2	1.7	0.2	0.5
Sand, very fine		6	5.6	5.7	7.1	6.9	0.7	1.8
Silt, coarse		3.1	2.6	2.9	11.8	12.4	10.4	8.9
Silt, medium		2.7	2.1	2.1	16.6	15.6	25.7	21.1
Silt, fine		2.1	1.8	2	15.9	14.8	21.4	20.2
Silt, very fine		1.4	1.4	1.9	11.9	12.5	8.2	14.9
Total fines (Reported, not calculated)		--	--	--	--	--	--	--
Clay, coarse		1.1	1.4	1.4	8.5	10.4	5.6	9.3
Clay, medium		0.9	1.4	1	5.6	6.4	3.4	5.5
Clay, fine		2.6	2.9	2.3	16.3	14.8	16.7	17
Metals (mg/kg)								
Cadmium	3	0.6	0.6	0.6	2.3	2.3	3	3.2
Polycyclic Aromatic Hydrocarbons (µg/kg)								
2-Methylnaphthalene		8.5	7.1	8.5 J	5.3	8.1	9.8	7.1
Acenaphthene		9.4 J	10 J	13 J	5.4	7.8 J	8 J	5.9 J
Acenaphthylene		34	42	49	18	27	25	16
Anthracene		12 J	13 J	16 J	9.1	15 J	14 J	10 J
Benzo(a)anthracene		7.7 J	8 J	10 J	13	13 J	12 J	8.8 J
Benzo(a)pyrene		8	8	11	14	14	14	9.8
Benzo(b,j,k)fluoranthenes		14	15	20	29	28	26	18
Benzo(g,h,i)perylene		8.7	8.4	11	11	13	15	9.8
Chrysene		12	10	12	18	20	15	11
Dibenzo(a,h)anthracene		4.9 UJ	4.7 UJ	4.7 UJ	5 U	4.9 UJ	4.9 UJ	4.9 UJ
Fluoranthene		52 J	62 J	76 J	50	74 J	72 J	48 J
Fluorene		7.2 J	6.9 J	8.8 J	5.8	8.2 J	11 J	8.2 J
Indeno(1,2,3-c,d)pyrene		4.8 J	4.5 J	5.7	6.7	7.6	8	5.9
Naphthalene		110	120	140 J	65	91	110	78
Phenanthrene		49 J	57 J	68 J	34	57 J	59 J	40 J
Pyrene		50 J	61 J	77 J	44	69 J	70 J	46 J
cPAH TEQ (U=1/2)	16	11.02 J	11.09 J	14.93 J	19.3 J	19.305 J	18.995 J	13.425 J

**Table F-1
Baseline Sediment Recovery Grab Sample Results**

	Task Location ID Sample ID Sample Date Depth Sample Type Matrix	2014RemedialDesign BW-01 BW-01-SG-0-2-140811 8/11/2014 0 to 2 cm N SE	2014RemedialDesign BW-01 BW-01-SG-2-10-140811 8/11/2014 2 to 10 cm N SE	2014RemedialDesign BW-01 BW-101-SG-2-10-140811 8/11/2014 2 to 10 cm FD SE	2014RemedialDesign BW-15 BW-15-SG-0-2-140811 8/11/2014 0 to 2 cm N SE	2014RemedialDesign BW-15 BW-15-SG-2-10-140811 8/11/2014 2 to 10 cm N SE	2014RemedialDesign BW-21 BW-21-SG-0-2-140811 8/11/2014 0 to 2 cm N SE	2014RemedialDesign Bw-21 BW-21-SG-2-10-140811 8/11/2014 2 to 10 cm N SE
	Site-specific Criteria							
Dioxin Furans (ng/kg)								
2,3,7,8-Tetrachlorodibenzo-p-dioxin (TCDD)		0.392 J	0.342 J	0.334 J	0.844 J	0.458 J	0.665 J	0.705 J
1,2,3,7,8-Pentachlorodibenzo-p-dioxin (PeCDD)		1.08	0.571 J	0.594 J	2.34	1.28	1.63	1.79
1,2,3,4,7,8-Hexachlorodibenzo-p-dioxin (HxCDD)		0.771 J	0.332 J	0.378 J	1.47	1.98	1.09	1.35
1,2,3,6,7,8-Hexachlorodibenzo-p-dioxin (HxCDD)		1.44	1.09	1.08	4.7	3.45	3.54	4.85
1,2,3,7,8,9-Hexachlorodibenzo-p-dioxin (HxCDD)		0.993 J	0.723 J	0.716 J	3.24	2.42	2.32	3.4
1,2,3,4,6,7,8-Heptachlorodibenzo-p-dioxin (HpCDD)		16.8	14	13.4	66.1	36.4	48.5	66
1,2,3,4,6,7,8,9-Octachlorodibenzo-p-dioxin (OCDD)		123	104	99.7	497	257	361	345
Total Tetrachlorodibenzo-p-dioxin (TCDD)		63.1 J	18.5 J	17.3 J	64 J	52.8 J	39.3 J	67.4 J
Total Pentachlorodibenzo-p-dioxin (PeCDD)		36.9	12.3	12.9 J	46.5	67.5	30.5	67.9
Total Hexachlorodibenzo-p-dioxin (HxCDD)		27	18	18.4	76.7	87.1	53.5	150
Total Heptachlorodibenzo-p-dioxin (HpCDD)		71.8	60.5	55	276	146	178	203
2,3,7,8-Tetrachlorodibenzofuran (TCDF)		1.08	1.24 J	1.09	4.26	1.7 J	2.93	2.88 J
1,2,3,7,8-Pentachlorodibenzofuran (PeCDF)		0.597 J	0.589 J	0.455 J	1.7 J	0.84 J	1.16	1.34
2,3,4,7,8-Pentachlorodibenzofuran (PeCDF)		0.573 J	0.438 J	0.406 J	1.99	0.886 J	1.39	1.47
1,2,3,4,7,8-Hexachlorodibenzofuran (HxCDF)		0.474 J	0.396 J	0.364 J	1.63 J	0.876 J	1.27 J	1.27 J
1,2,3,6,7,8-Hexachlorodibenzofuran (HxCDF)		0.426 J	0.438 J	0.237 J	1.25	0.724 J	0.937 J	1.03
1,2,3,7,8,9-Hexachlorodibenzofuran (HxCDF)		0.356 J	0.186 J	0.0815 U	0.349 J	0.626 J	0.313 J	0.402 J
2,3,4,6,7,8-Hexachlorodibenzofuran (HxCDF)		0.523 J	0.396 J	0.235 J	1.52 J	0.8 J	1.24 J	1.21
1,2,3,4,6,7,8-Heptachlorodibenzofuran (HpCDF)		2.81	2.54	2.61	11.5	5.47	9.02	9.35
1,2,3,4,7,8,9-Heptachlorodibenzofuran (HpCDF)		0.482 J	0.112 J	0.101 J	0.717 J	0.844 J	0.627 J	0.61 J
1,2,3,4,6,7,8,9-Octachlorodibenzofuran (OCDF)		5.03	4.48	4.68	18.8	10	14.2	15
Total Tetrachlorodibenzofuran (TCDF)		19.9	21.3 J	18.9	72	27.2 J	51.7	49.3 J
Total Pentachlorodibenzofuran (PeCDF)		8.55 J	7.78 J	7.26 J	33.2	13 J	23.5	25.5
Total Hexachlorodibenzofuran (HxCDF)		6.13 J	5.91 J	4.84 J	22.4 J	11.1 J	17.7 J	19.3 J
Total Heptachlorodibenzofuran (HpCDF)		7.5	6.57 J	6.94 J	30.2	14.8 J	22.9 J	22.8 J
Total Dioxin/Furan TEQ 2005 (Mammal) (U = 1/2)	5	2.507439 J	1.741234 J	1.669949 J	6.61181 J	3.79384 J	4.80483 J	5.483 J

**Table F-1
Baseline Sediment Recovery Grab Sample Results**

	Task Location ID Sample ID Sample Date Depth Sample Type Matrix	2014RemedialDesign PGSS-29 PGSS-29-SG-0-2-140811 8/11/2014 0 to 2 cm N SE	2014RemedialDesign PGSS-29 PGSS-29-SG-2-10-140811 8/11/2014 2 to 10 cm N SE	2014RemedialDesign PGST-1 PGST-1-SG-0-2-140811 8/11/2014 0 to 2 cm N SE	2014RemedialDesign PGST-1 PGST-1-SG-2-10-140811 8/11/2014 2 to 10 cm N SE	2014RemedialDesign PGST-5 PGST-5-SG-0-2-140811 8/11/2014 0 to 2 cm N SE	2014RemedialDesign PGST-5 PGST-5-SG-2-10-140811 8/11/2014 2 to 10 cm N SE
Site-specific Criteria							
Conventional Parameters (mg/kg)							
Total organic carbon		0.798	1.46	3.59	2.03	2.5	3.65
Total solids		64.7	67.49	26.88	30.17	27.48	32.23
Grain Size (%)							
Gravel		0.2	0.5	0.1 U	0.1 U	0.2	0.9
Sand, very coarse		1.3	1.2	0.1 U	0.1	0.8	0.1 U
Sand, coarse		5	5.3	0.2	1.8	1.6	2.8
Sand, medium		19.7	19.3	1.8	1.3	2	2.3
Sand, fine		40.2	39.9	1.2	1	3.8	4.2
Sand, very fine		19.4	19.3	4.8	4.8	13.1	12.7
Silt, coarse		3.9	3.5	13.4	15.9	12.7	11
Silt, medium		2.8	3.1	24.5	16.4	17	16.8
Silt, fine		1.8	2.1	16.1	15.8	13.7	13.4
Silt, very fine		1.3	1.4	11.1	12.3	11.2	11.5
Total fines (Reported, not calculated)		--	--	--	--	--	--
Clay, coarse		0.9	0.9	7.3	9.5	5.4	6.3
Clay, medium		0.8	1	6	7.1	4.9	5.5
Clay, fine		2.7	2.5	13.6	14	13.7	12.6
Metals (mg/kg)							
Cadmium	3	0.8	0.8	2.5	2.5	2	2
Polycyclic Aromatic Hydrocarbons (µg/kg)							
2-Methylnaphthalene		8	9.2	10	12	16	26
Acenaphthene		8.2 J	8.4 J	10 J	11 J	21 J	35 J
Acenaphthylene		20	21	26	29	69	120
Anthracene		16 J	17 J	21 J	24 J	31 J	50 J
Benzo(a)anthracene		11 J	9.2 J	23 J	33 J	32 J	47 J
Benzo(a)pyrene		12	9.6	26	31	29	44
Benzo(b,j,k)fluoranthenes		22	18	57	68	61	88
Benzo(g,h,i)perylene		11	10	20	24	23	36
Chrysene		12	12	32	69	81	63
Dibenzo(a,h)anthracene		5 UJ	4.9 UJ	2.7 J	3.2 J	2.8 J	3.9 J
Fluoranthene		84 J	76 J	94 J	120 J	140 J	200 J
Fluorene		11 J	11 J	12 J	14 J	19 J	28 J
Indeno(1,2,3-c,d)pyrene		6.1	4.9 J	13	16	14	22
Naphthalene		130	120	89	100	190	370
Phenanthrene		69 J	71 J	67 J	80 J	120 J	180 J
Pyrene		87 J	77 J	85 J	110 J	130 J	190 J
cPAH TEQ (U=1/2)	16	16.28 J	13.175 J	35.89 J	43.71 J	40.79 J	60.72 J

**Table F-1
Baseline Sediment Recovery Grab Sample Results**

Task	2014RemedialDesign	2014RemedialDesign	2014RemedialDesign	2014RemedialDesign	2014RemedialDesign	2014RemedialDesign	
	Location ID	Location ID	Location ID	Location ID	Location ID	Location ID	
Sample ID	PGSS-29	PGSS-29	PGST-1	PGST-1	PGST-5	PGST-5	
Sample Date	PGSS-29-SG-0-2-140811	PGSS-29-SG-2-10-140811	PGST-1-SG-0-2-140811	PGST-1-SG-2-10-140811	PGST-5-SG-0-2-140811	PGST-5-SG-2-10-140811	
Depth	8/11/2014	8/11/2014	8/11/2014	8/11/2014	8/11/2014	8/11/2014	
Sample Type	0 to 2 cm	2 to 10 cm	0 to 2 cm	2 to 10 cm	0 to 2 cm	2 to 10 cm	
Matrix	N	N	N	N	N	N	
Matrix	SE	SE	SE	SE	SE	SE	
Site-specific Criteria							
Dioxin Furans (ng/kg)							
2,3,7,8-Tetrachlorodibenzo-p-dioxin (TCDD)	0.304 J	1.14 J	0.648 J	0.691 J	0.76 J	0.826 J	
1,2,3,7,8-Pentachlorodibenzo-p-dioxin (PeCDD)	0.536 J	1.97 J	1.58	1.94	2.03	2.12	
1,2,3,4,7,8-Hexachlorodibenzo-p-dioxin (HxCDD)	0.393 J	1.27 J	1.11 J	1.45	1.41	1.42	
1,2,3,6,7,8-Hexachlorodibenzo-p-dioxin (HxCDD)	1.09	2.26 J	4.38	5.41	4.45	4.96	
1,2,3,7,8,9-Hexachlorodibenzo-p-dioxin (HxCDD)	0.895 J	2.52 J	2.78	3.07	2.88	3.08	
1,2,3,4,6,7,8-Heptachlorodibenzo-p-dioxin (HpCDD)	16.7	16.1	75.1	99.8	79.4	74.6	
1,2,3,4,6,7,8,9-Octachlorodibenzo-p-dioxin (OCDD)	125	112	631	858	664	584	
Total Tetrachlorodibenzo-p-dioxin (TCDD)	9.38 J	12.7 J	48.2 J	47.5	64.7	58 J	
Total Pentachlorodibenzo-p-dioxin (PeCDD)	8.07	12.7 J	40	37	40.8	42.2	
Total Hexachlorodibenzo-p-dioxin (HxCDD)	18.4 J	20.8 J	78.5 J	92.7	73.4	82.3	
Total Heptachlorodibenzo-p-dioxin (HpCDD)	76.1	64.60	358	512	388	325	
2,3,7,8-Tetrachlorodibenzofuran (TCDF)	0.846 J	2.17 J	2.78	2.91	3.73	4.31	
1,2,3,7,8-Pentachlorodibenzofuran (PeCDF)	0.419 J	1.89 J	1.1 J	1.16 J	1.4	1.6	
2,3,4,7,8-Pentachlorodibenzofuran (PeCDF)	0.383 J	1.72 J	1.22	1.29	1.4 J	1.76 J	
1,2,3,4,7,8-Hexachlorodibenzofuran (HxCDF)	0.245 J	1.2 J	1.15 J	1.24	1.36 J	1.42 J	
1,2,3,6,7,8-Hexachlorodibenzofuran (HxCDF)	0.261 J	1.14 J	0.776 J	0.932 J	0.945 J	1.19	
1,2,3,7,8,9-Hexachlorodibenzofuran (HxCDF)	0.117 J	2.07 J	0.299 J	0.337 J	0.339 J	0.409 J	
2,3,4,6,7,8-Hexachlorodibenzofuran (HxCDF)	0.259 J	0.956 J	1.06 J	1.17 J	1.29 J	1.41 J	
1,2,3,4,6,7,8-Heptachlorodibenzofuran (HpCDF)	2.07	3.41 J	10.6	12.7	11	11.7 J	
1,2,3,4,7,8,9-Heptachlorodibenzofuran (HpCDF)	0.148 J	1.83 J	0.516 J	0.649 J	0.684 J	0.691 J	
1,2,3,4,6,7,8,9-Octachlorodibenzofuran (OCDF)	3.64	4.86 J	21.2	25	22.3	23	
Total Tetrachlorodibenzofuran (TCDF)	14.3	19.7 J	42.9	49.9	59	76.6	
Total Pentachlorodibenzofuran (PeCDF)	6.49 J	9.63 J	20.6 J	24.5 J	26.4 J	29.6 J	
Total Hexachlorodibenzofuran (HxCDF)	4.19 J	10.7 J	18.8 J	21.7 J	20.5 J	22.3 J	
Total Heptachlorodibenzofuran (HpCDF)	5.33 J	9.41 J	29.2 J	35.9 J	30.8	32.8 J	
Total Dioxin/Furan TEQ 2005 (Mammal) (U = 1/2)	5	1.605842 J	5.289758 J	5.11832 J	6.10109 J	6.00913 J	6.39391 J

Notes:
 µg/kg = micrograms per kilogram
 cm = centimeter
 cPAH = carcinogenic polycyclic aromatic hydrocarbon
 FD = field duplicate
 J = estimated value
 mg/kg = milligrams per kilogram
 N= normal
 ng/kg = nanograms per kilogram
 SE = sediment
 TEQ = Toxic Equivalents Quotient
 U = not detected above reporting limit

**Table F-2
Natural Recovery Model Input Parameters**

Model Parameter	SMA-1	SMA-2	SMA-3	SMA-4	SMA-5	Comments
Starting Surface Sediment cPAH (µg/kg)	525	162	39	32	35	SWAC based on 10-cm surface data (2008 – 2011)
Depositing Particle cPAH (µg/kg)	5 and 10					Estimated based on multiple lines of evidence, including 0 to 2 cm core data
Net sedimentation rate (cm/yr)	0.4					Dated lead-210 cores (range of 0.3 to 0.5 cm/yr)
Model domain and mixing depth						Model framework is based on a 2-cm completely mixed zone overlying an 8-cm-thick zone with no mixing (for total thickness of 10 cm for assessing compliance)
Area (acres)	6	19	61	19	609	
Post-Capping/Thin Layer Capping cPAH (µg/kg)	8			NA	NA	1/2 cleanup level
cPAH Dredge Residual (µg/kg)	430		NA	NA	NA	Average concentration in dredge areas (SMA-1 and SMA-2)

Notes:

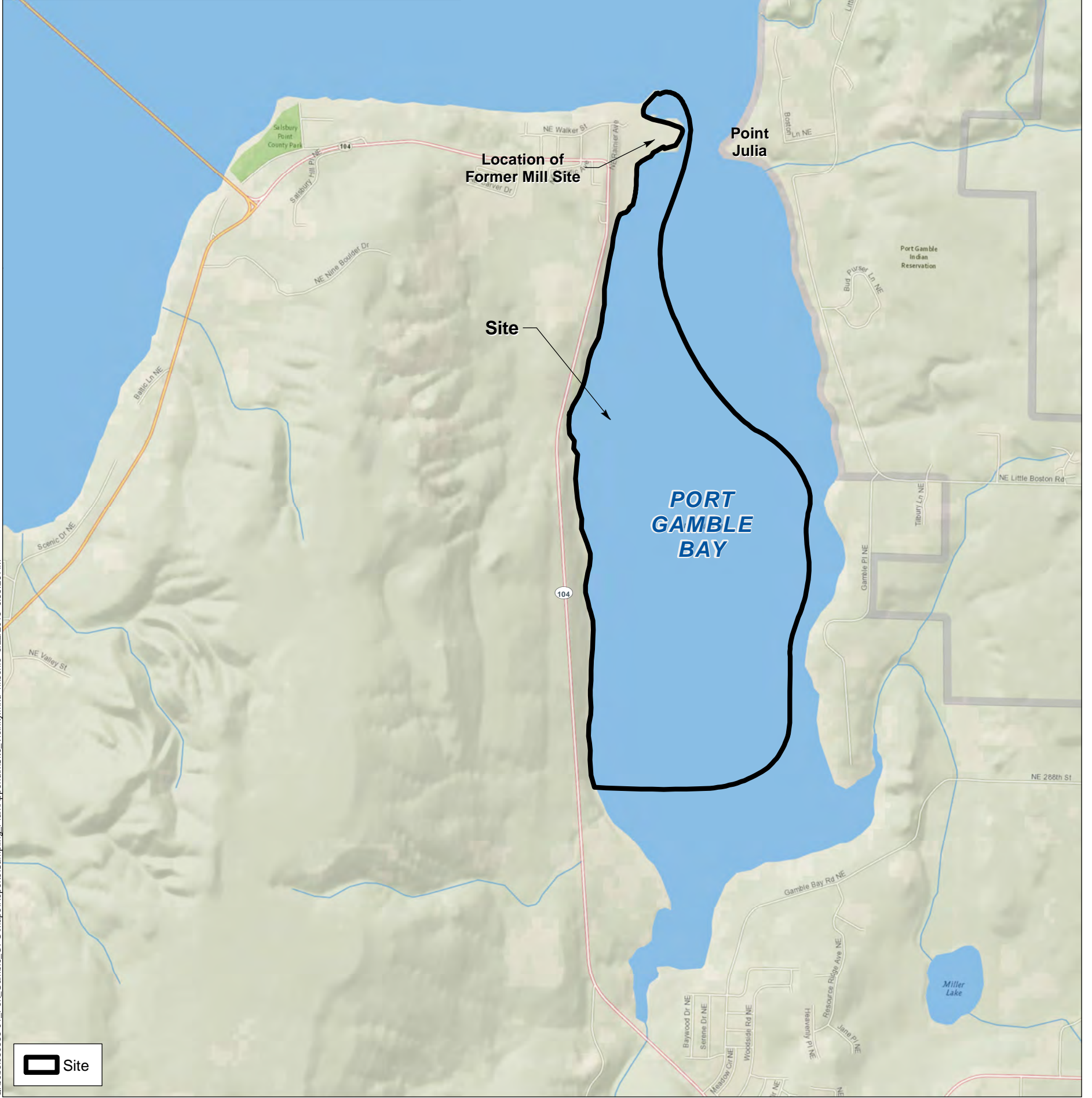
Model framework is based on a 2-cm completely mixed zone overlying an 8-cm-thick zone with no mixing (for total thickness of 10 cm for assessing compliance).

NA - not applicable

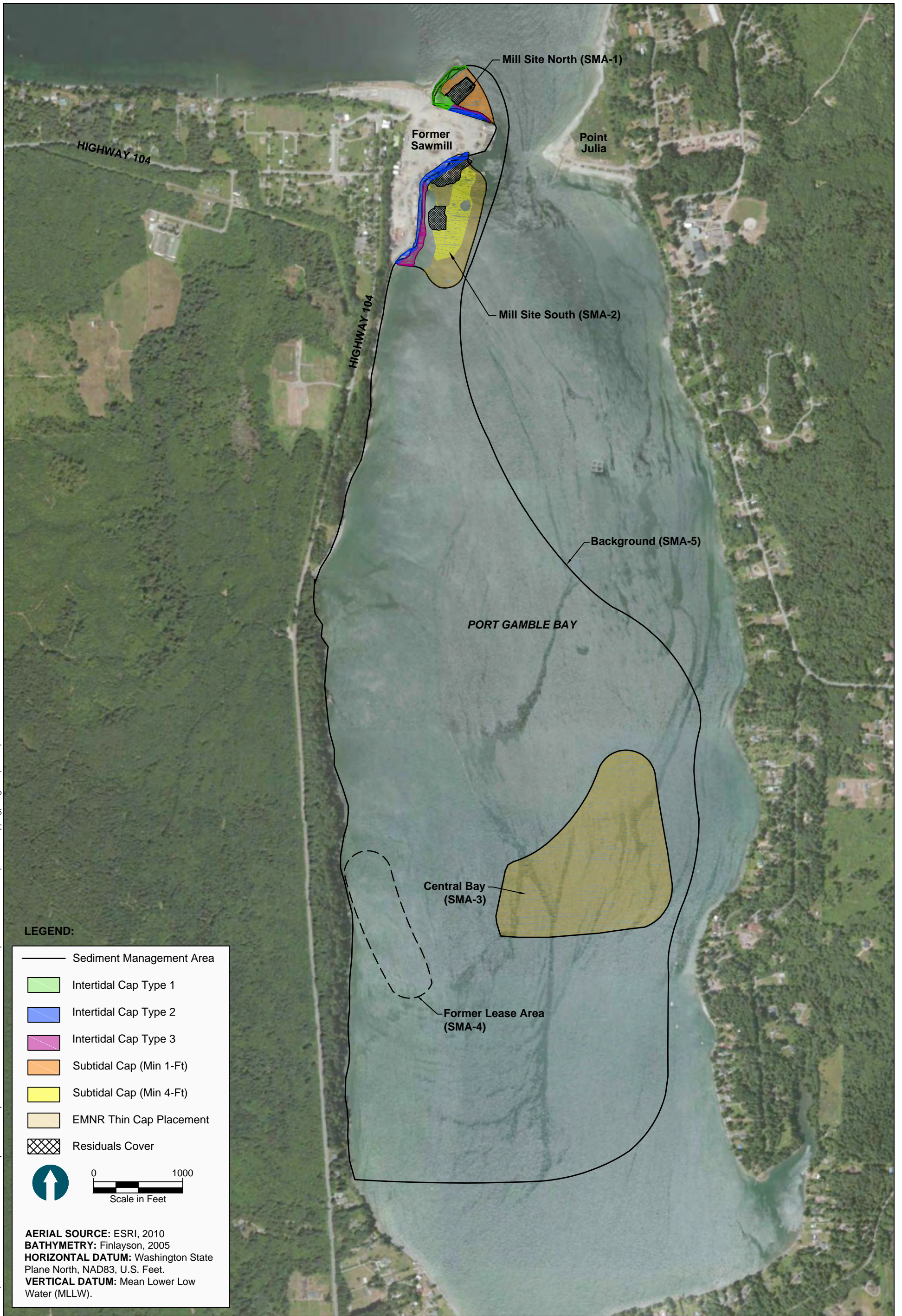
µg/kg - microgram per kilogram

cm/yr - centimeters per year

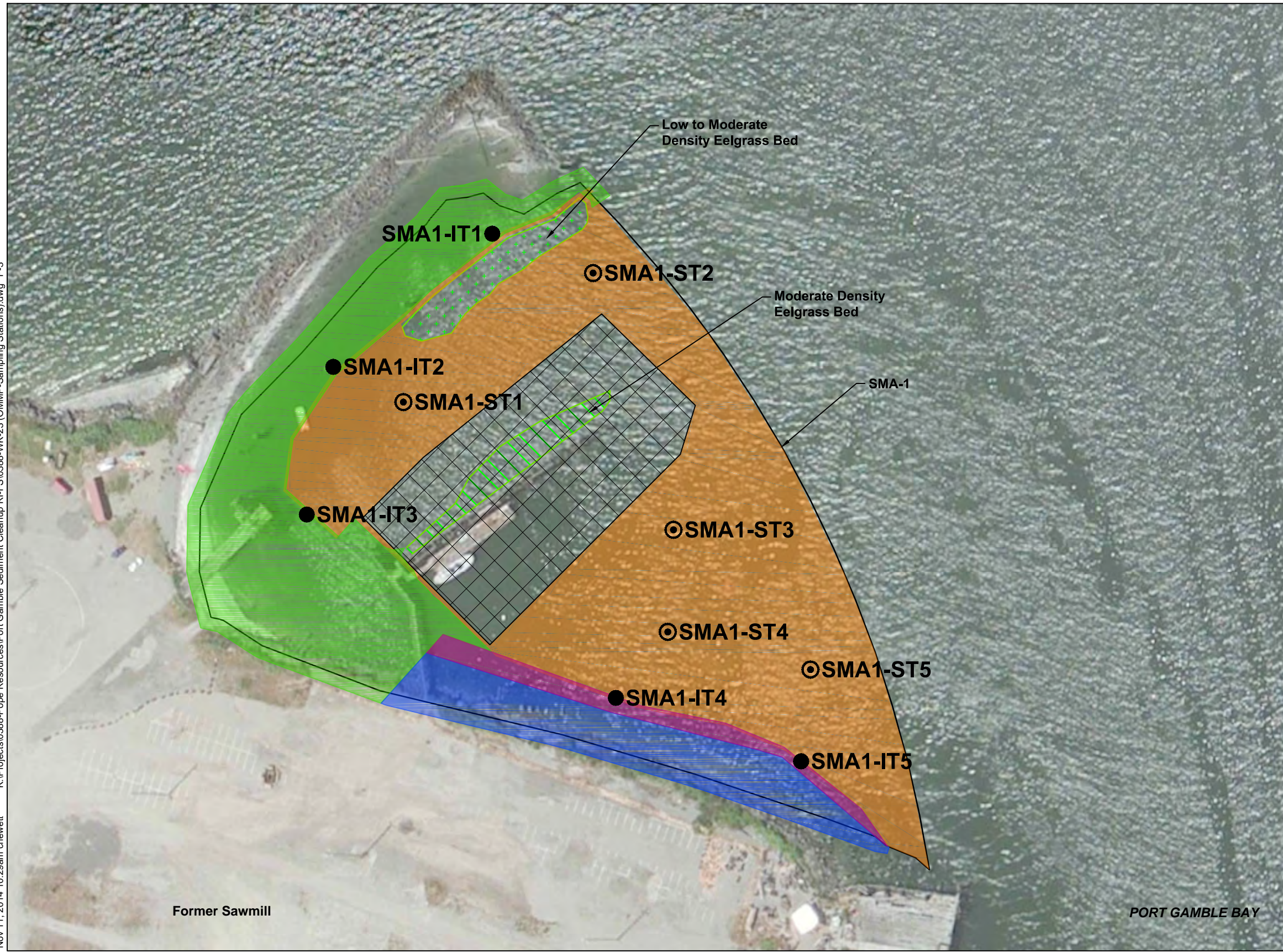
FIGURES



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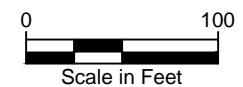


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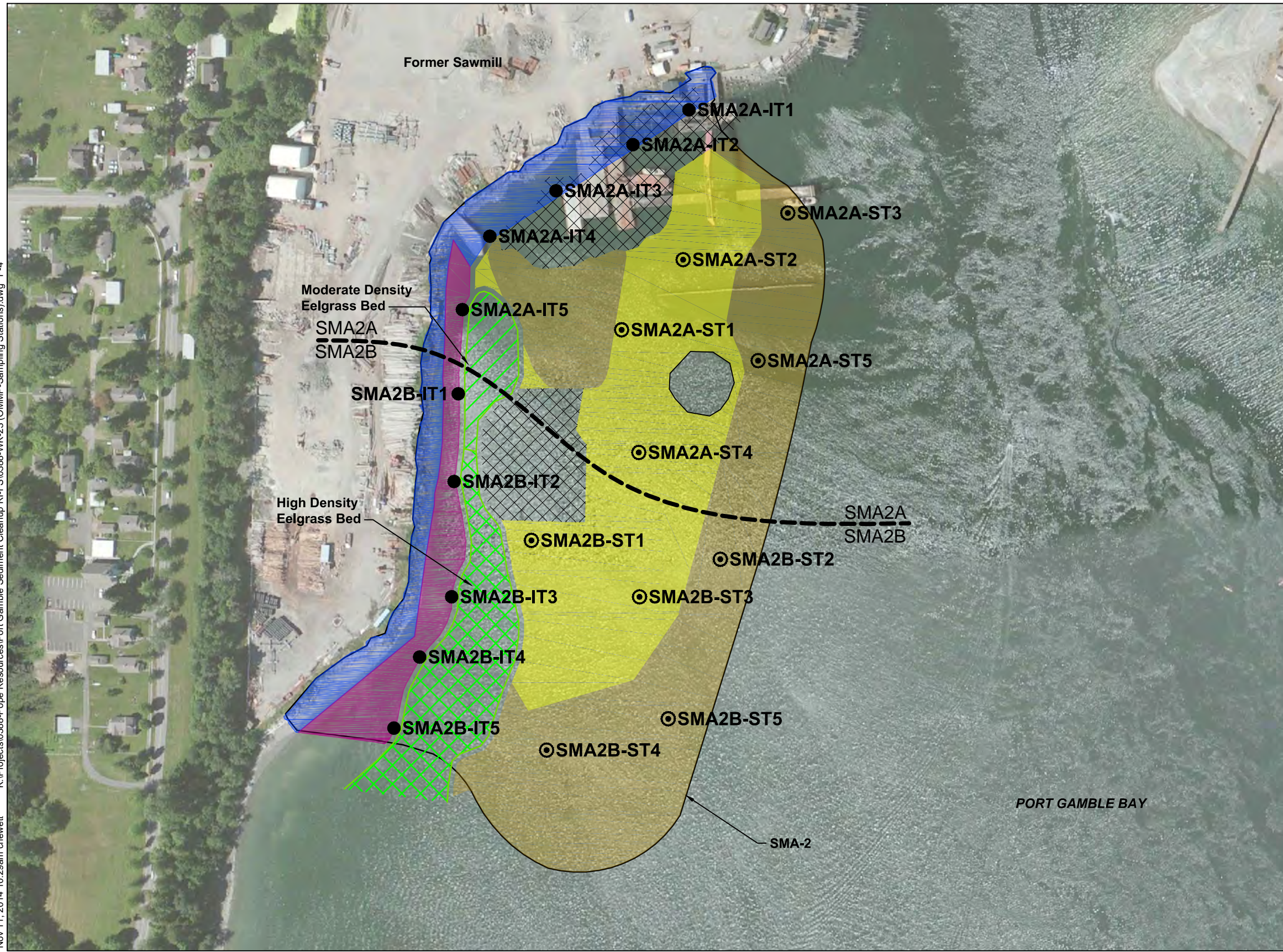
LEGEND:

- Sediment Management Area
- Intertidal Cap Type 1
- Intertidal Cap Type 2
- Intertidal Cap Type 3
- Subtidal Cap (Min 1-Ft)
- Residuals Cover
- Proposed Subtidal Sentinel Surface Sediment Sample Aliquot Location
- Proposed Intertidal Sentinel Surface Sediment Sample Aliquot Location
- Moderate Density Eelgrass Bed
- Low to Moderate Density Eelgrass Bed

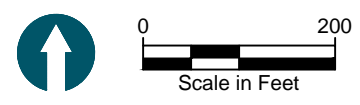


AERIAL SOURCE: ESRI, 2010
HORIZONTAL DATUM: Washington State Plane North, NAD83, U.S. Feet.

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- LEGEND:**
- Sediment Management Area
 - Intertidal Cap Type 2
 - Intertidal Cap Type 3
 - Subtidal Cap (Min 4-Ft)
 - EMNR Thin Cap Placement
 - ▨ Residuals Cover
 - ⊙ Proposed Subtidal Sentinel Surface Sediment Sample Aliquot Location
 - Proposed Intertidal Sentinel Surface Sediment Sample Aliquot Location
 - ▨ Moderate Density Eelgrass Bed
 - ▨ High Density Eelgrass Bed

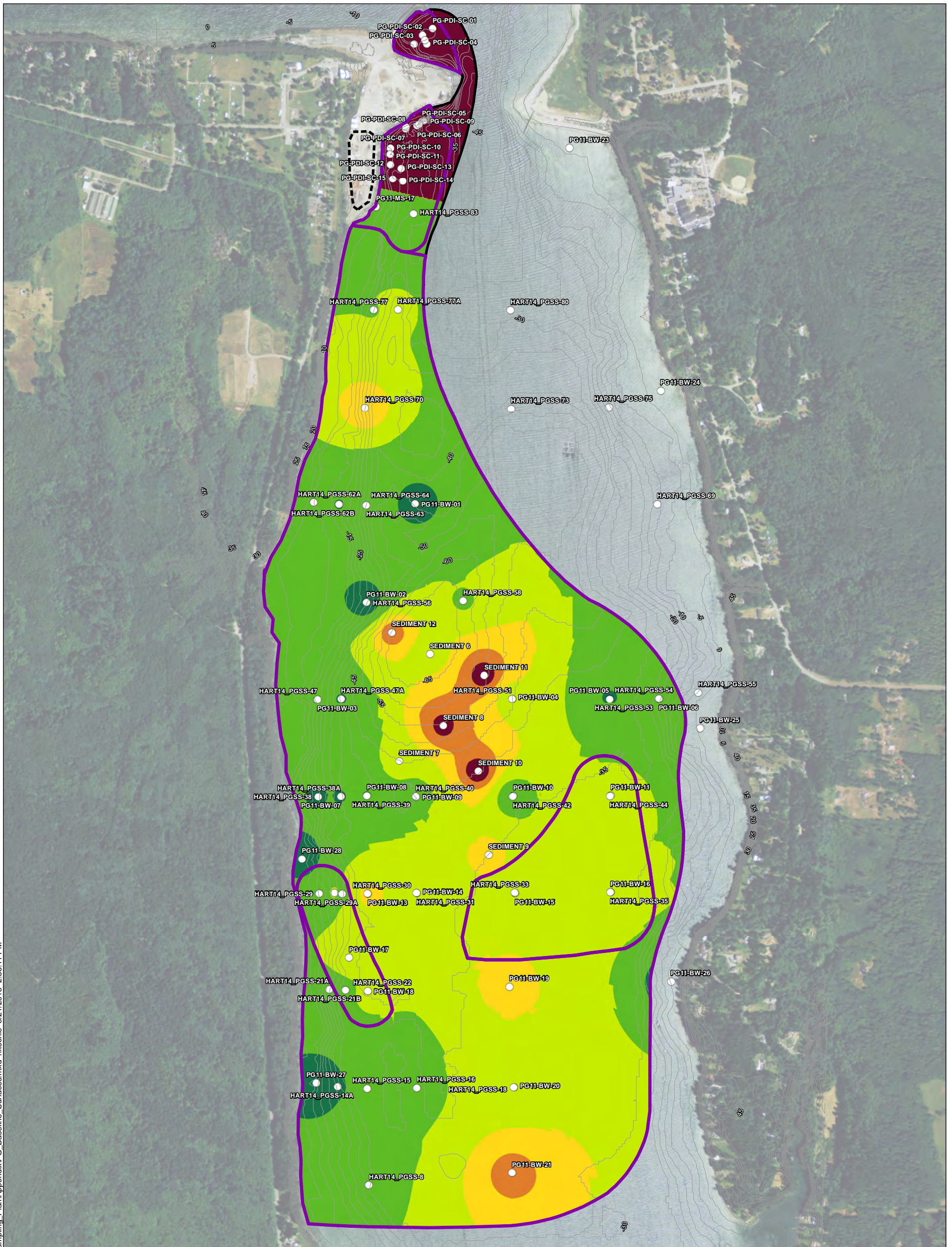


AERIAL SOURCE: ESRI, 2010
HORIZONTAL DATUM: Washington State Plane North, NAD83, U.S. Feet.



Figure F-4
 Sediment Sampling Stations (SMA-2)
 Appendix F: Operations, Maintenance, and Monitoring Plan
 Port Gamble Bay Cleanup

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○ Sample Locations

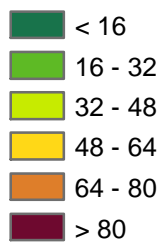
Port Gamble SMA

▭ Sediment Management Area (SMA)

▭ Proposed Upland Re-handling/Beneficial Reuse Area

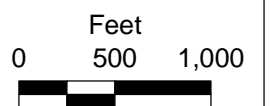
▭ SWAC Area

cPAH TEQ (U=1/2 $\mu\text{g}/\text{kg}$)

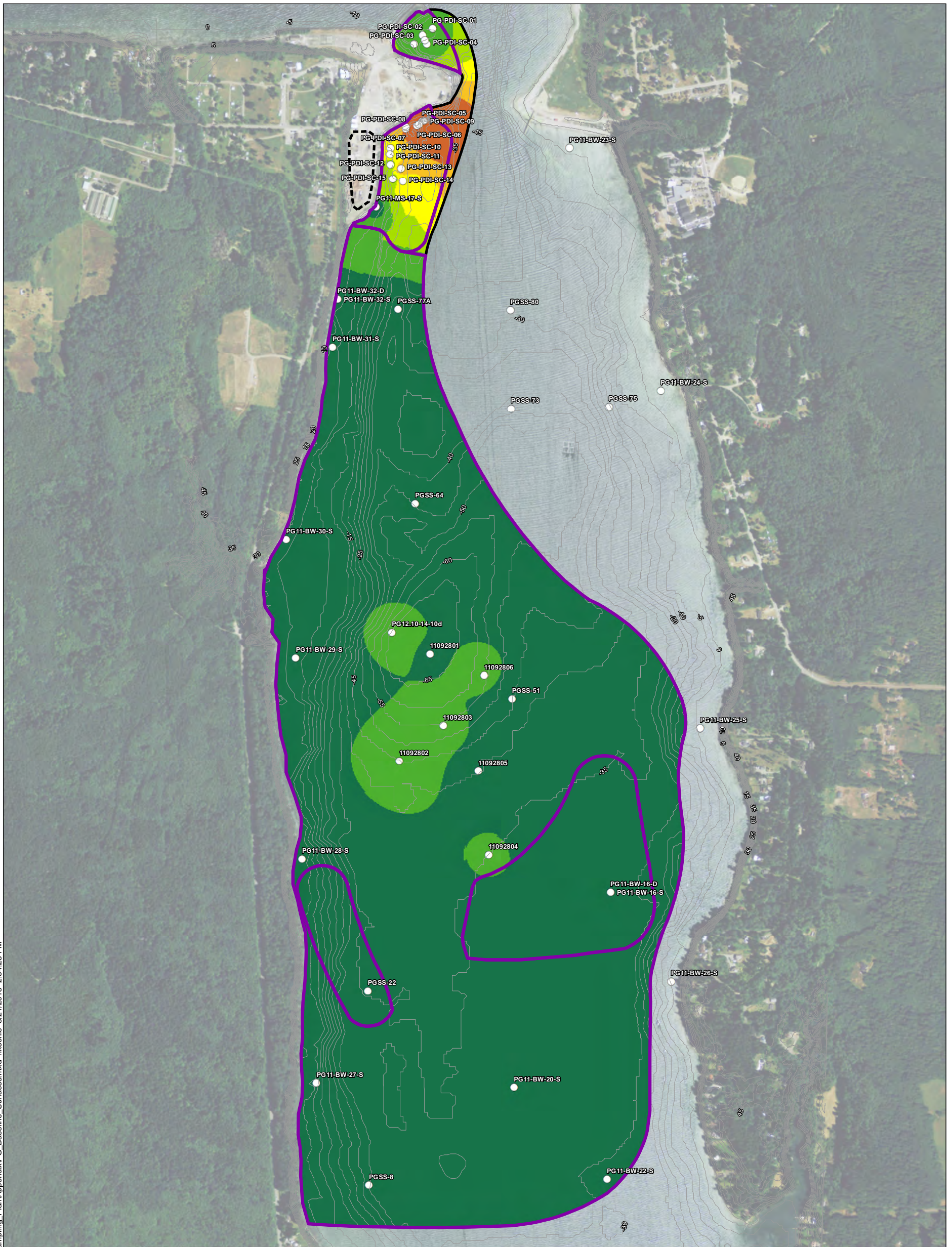


NOTE:

Site-wide area-weighted average cPAH TEQ = 42.4 $\mu\text{g}/\text{kg}$



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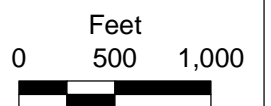
- Sample Locations
- Port Gamble SMA**
- ▭ Sediment Management Area (SMA)
- ▭ Proposed Upland Re-handling/Beneficial Reuse Area
- ▭ SWAC Area

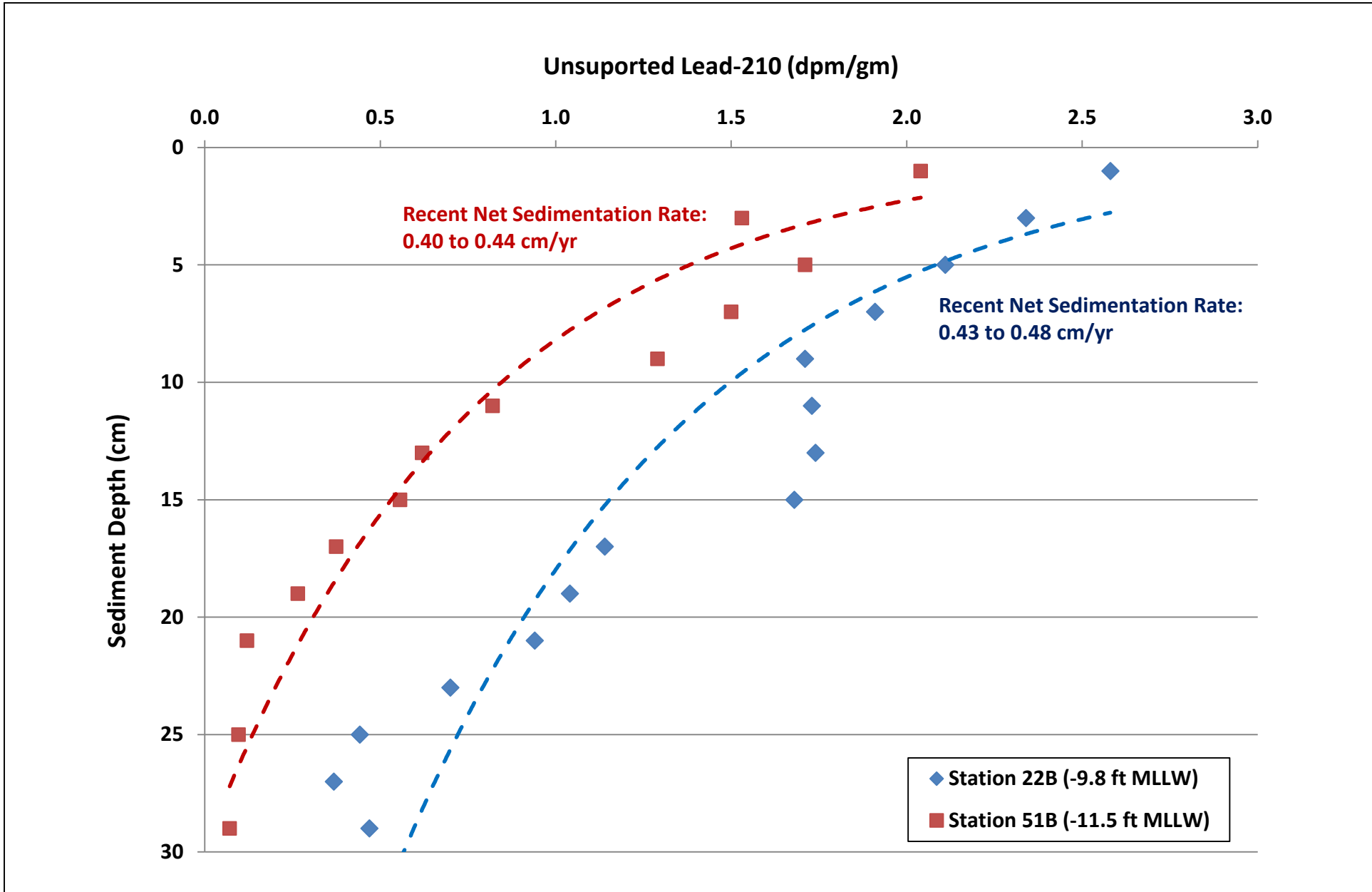
DF TEQ (U=1/2 Mammal)

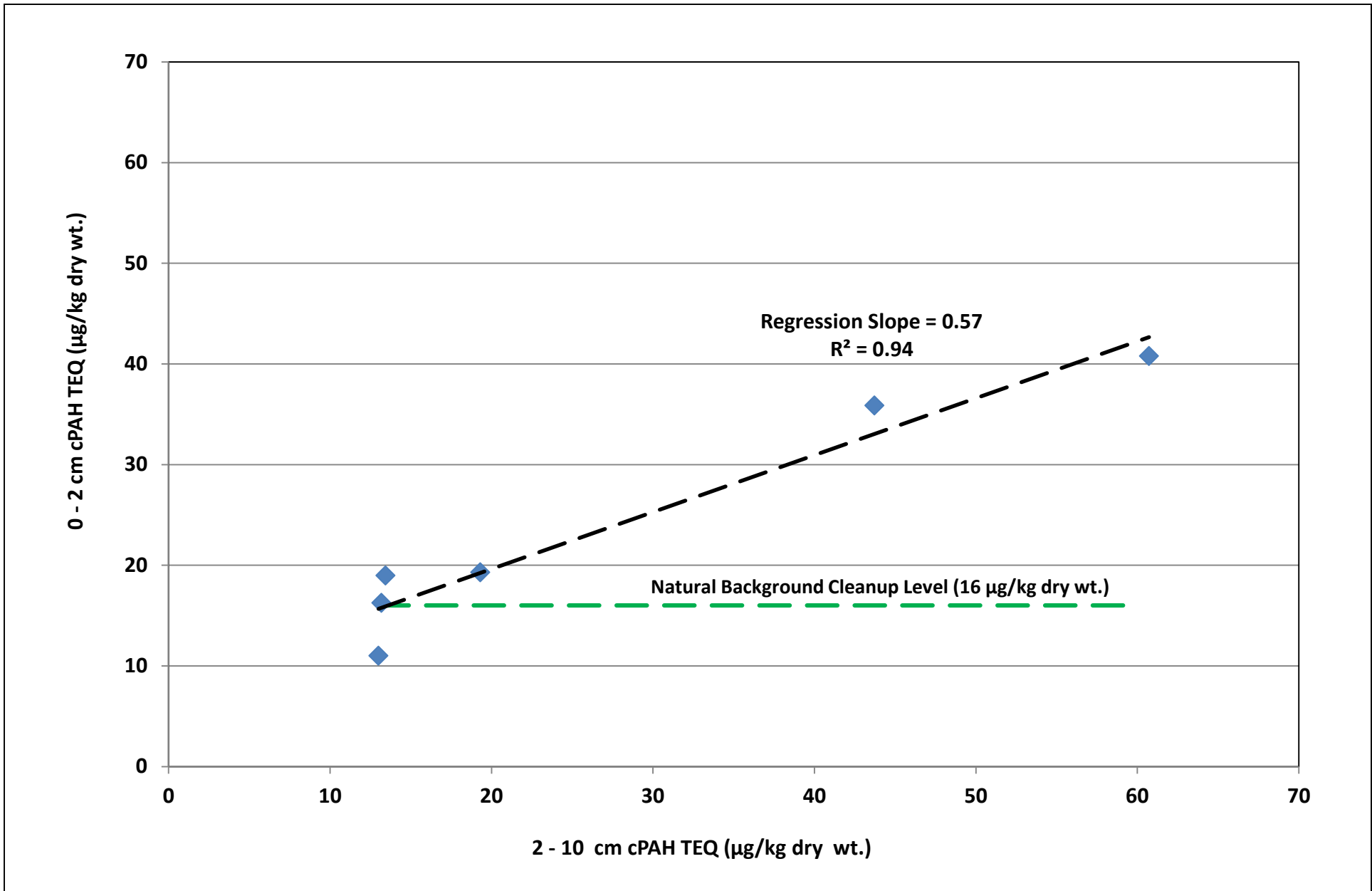
- < 5
- 5 - 10
- 10 - 15
- 15 - 20
- 20 - 25
- 25 - 50
- > 50

NOTE:

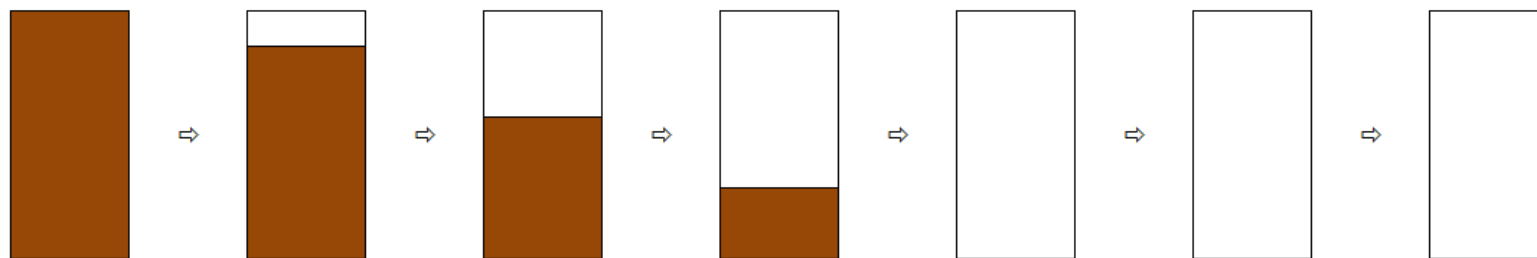
Site-wide area-weighted average dioxin/furan TEQ = 2.9 ng/kg



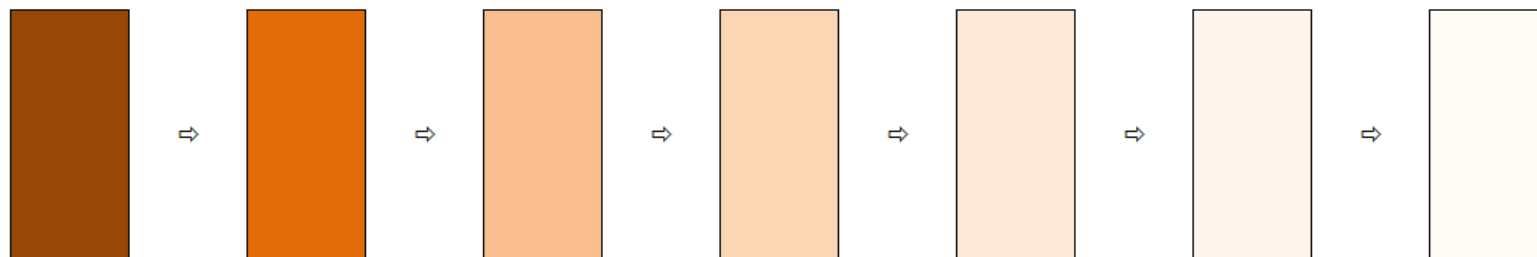




No mixing over top 10 cm



Complete mixing over top 10 cm



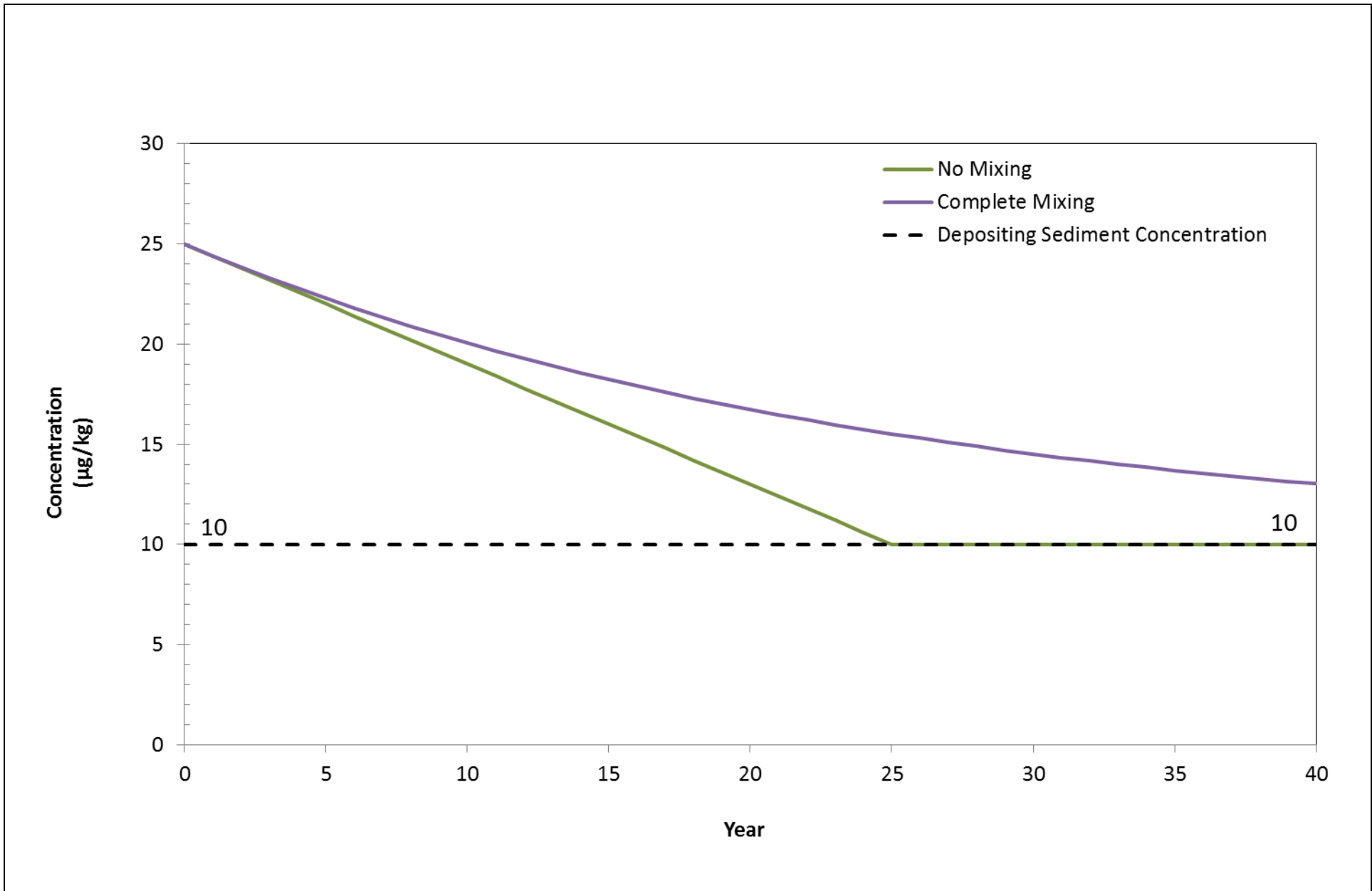


Figure F-10

Example Bounding Calculation Model Results
 Appendix F: Operations, Maintenance, and Monitoring Plan
 Port Gamble Bay Cleanup

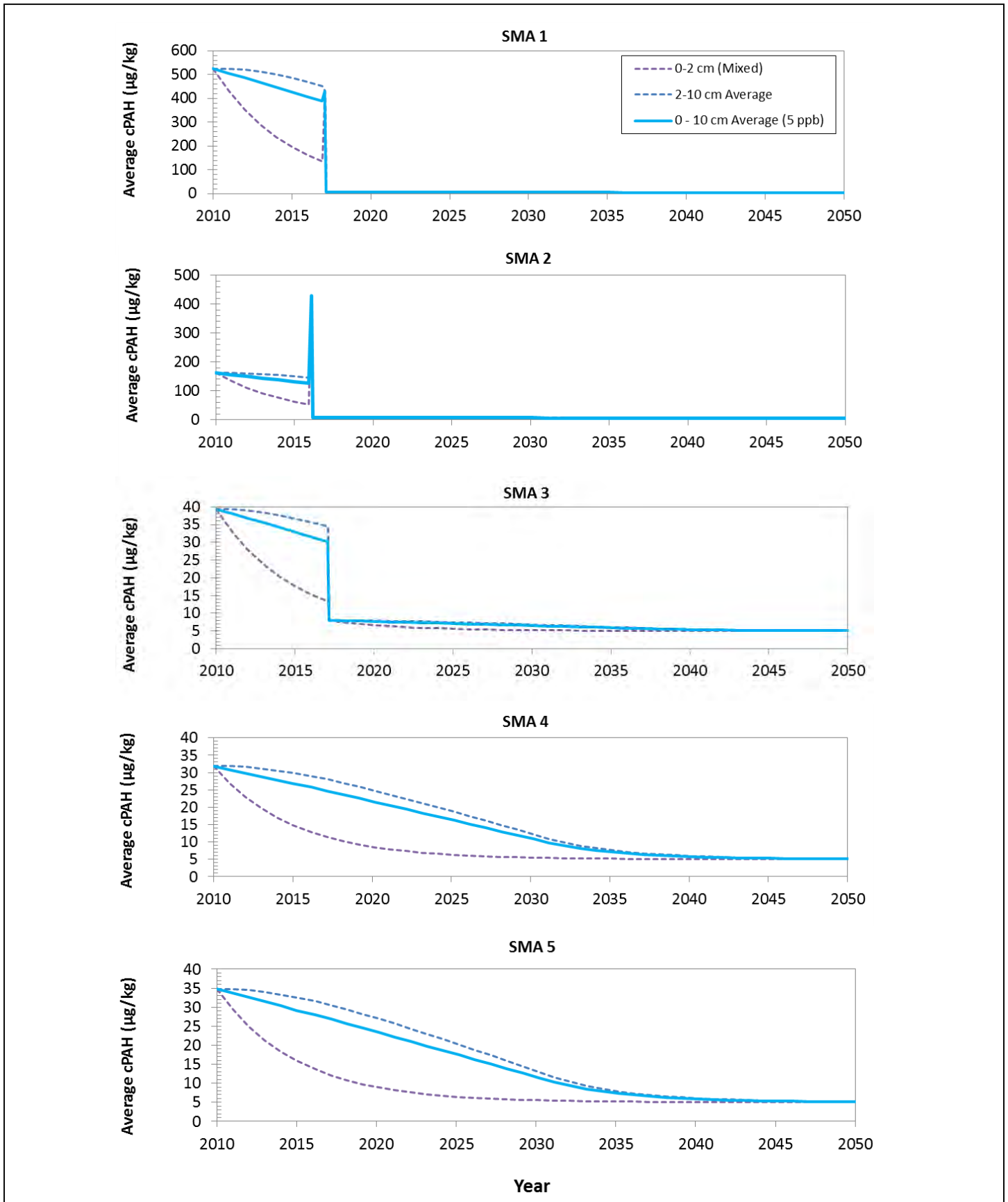


Figure F-11

SMA-specific Model Results Assuming 5 µg/kg on Depositing Sediment
 Appendix F: Operations, Maintenance, and Monitoring Plan
 Port Gamble Bay Cleanup



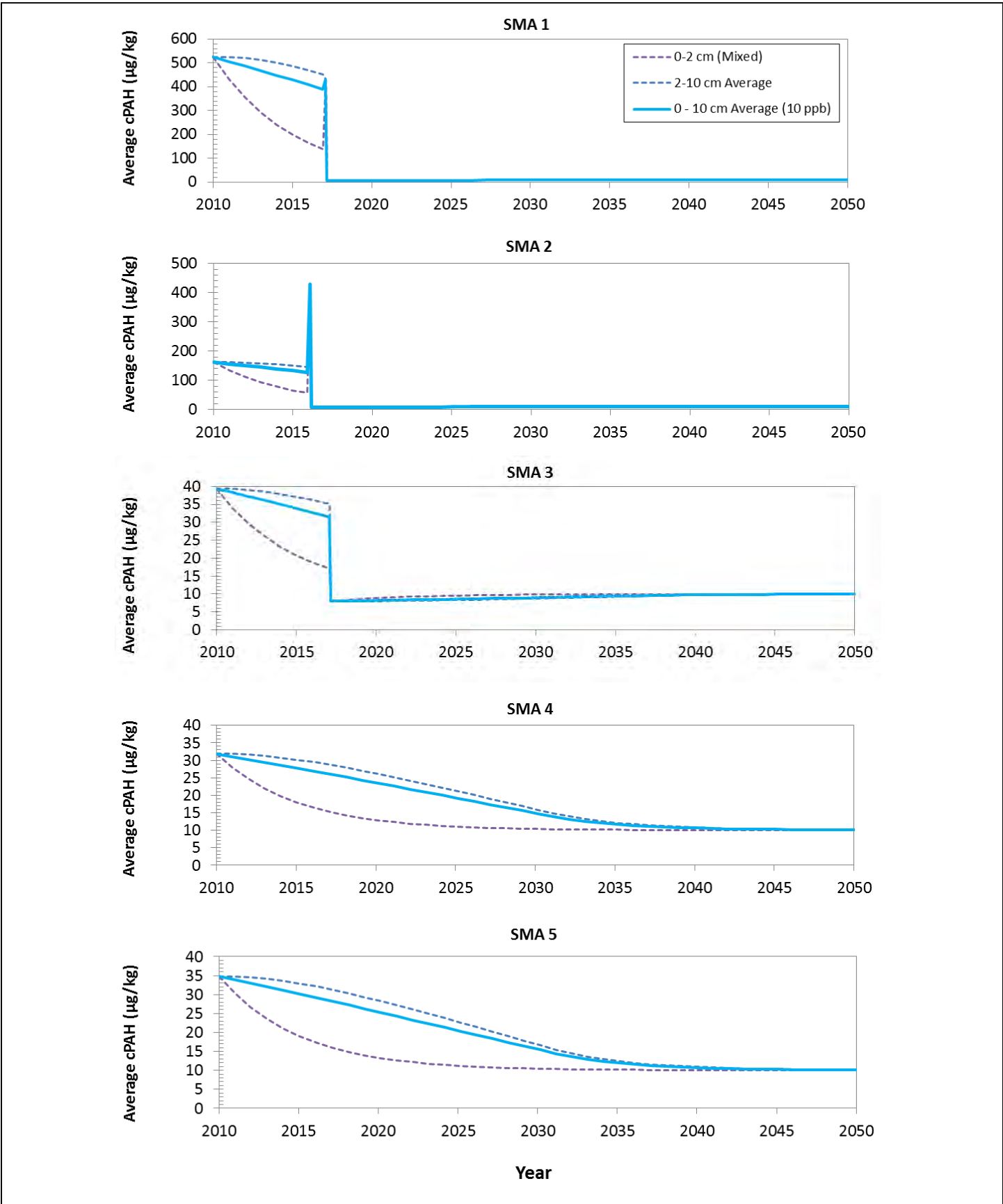


Figure F-12

SMA-specific Model Results Assuming 10 µg/kg on Depositing Sediment
 Appendix F: Operations, Maintenance, and Monitoring Plan
 Port Gamble Bay Cleanup



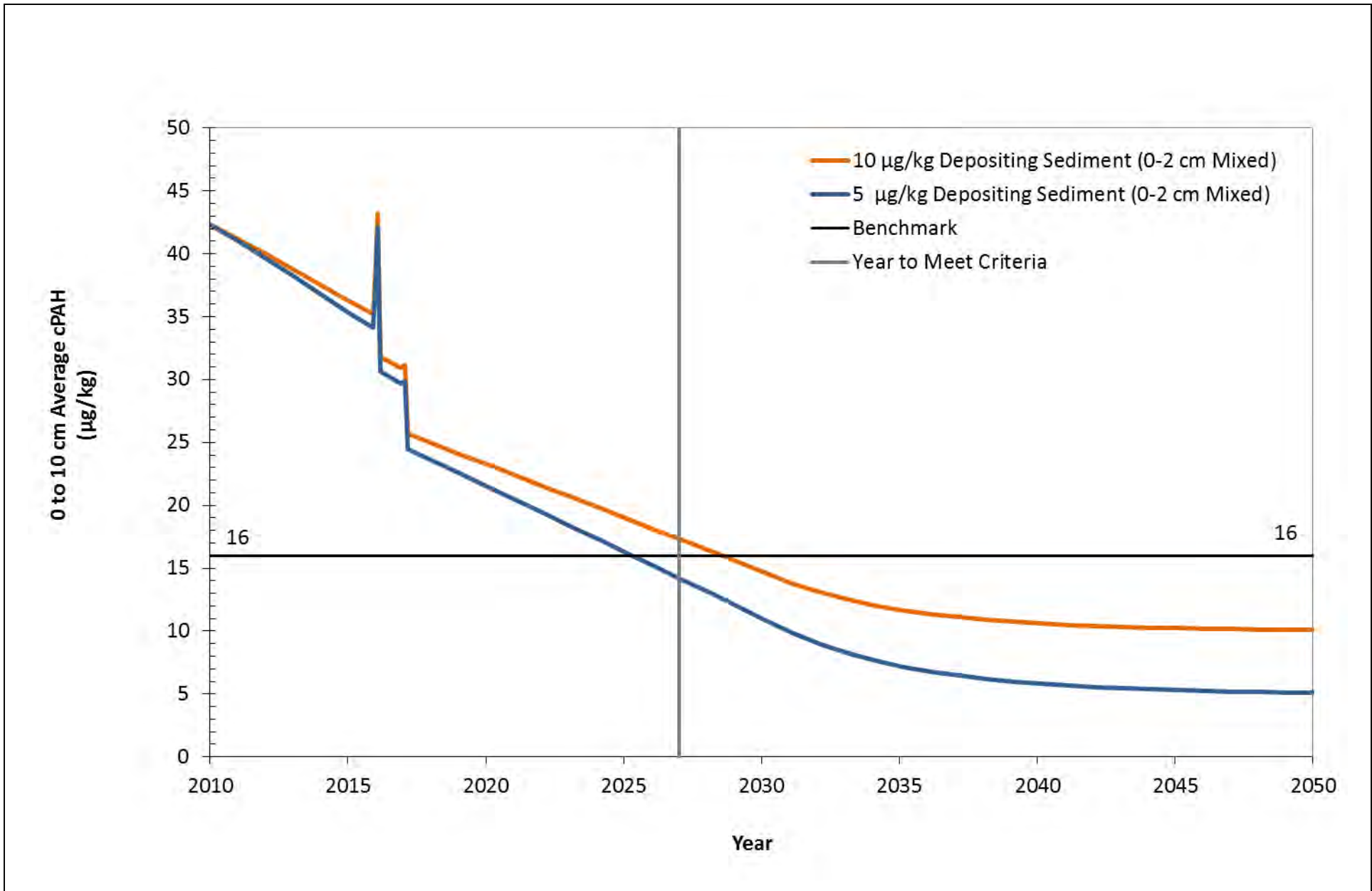


Figure F-13

Modeled Site-wide Surface Sediment cPAH Concentrations
 Appendix F: Operations, Maintenance, and Monitoring Plan
 Port Gamble Bay Cleanup

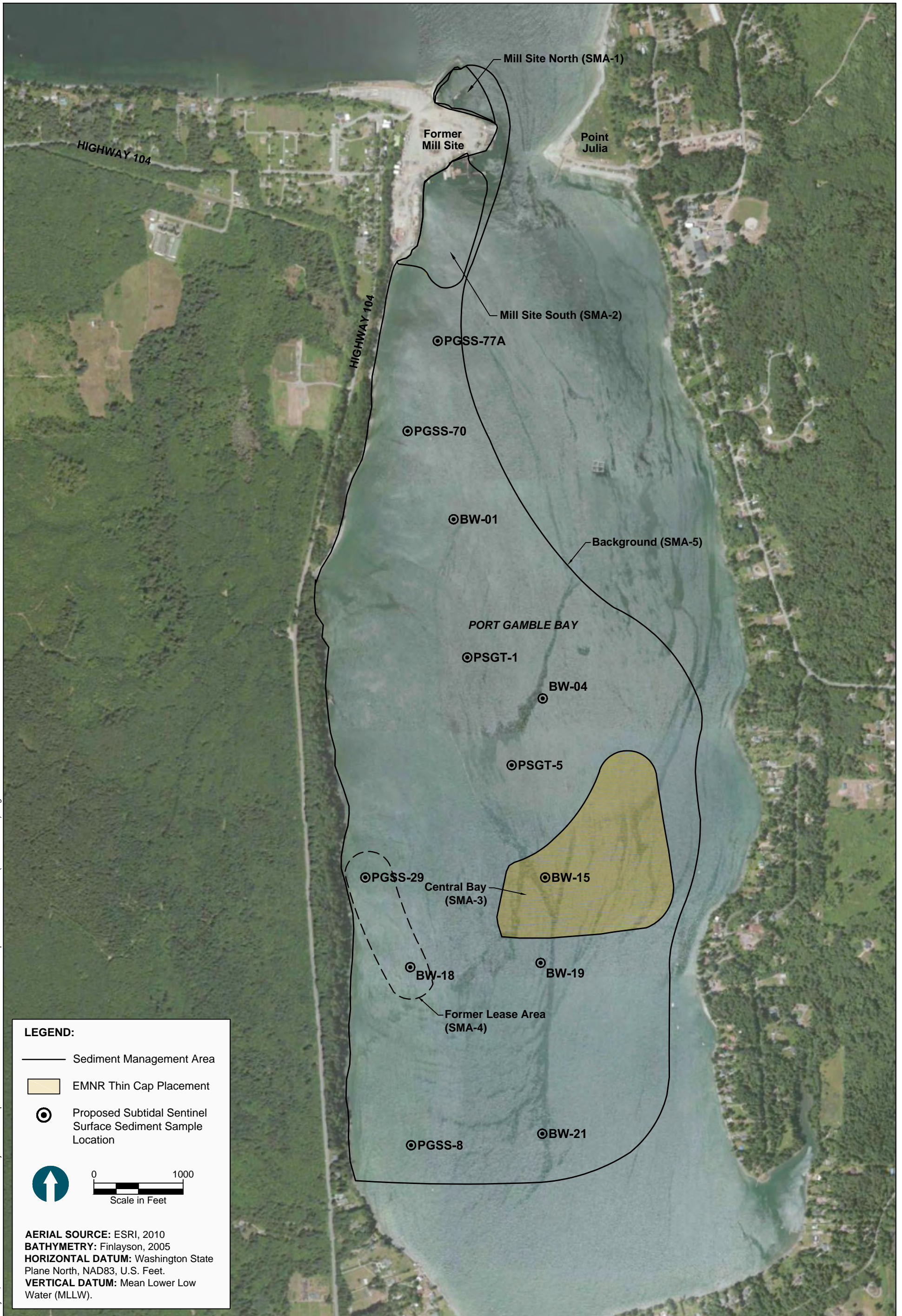


Figure F-14
 Surface Sediment Sampling Stations, Port Gamble Bay
 Appendix F: Operations, Maintenance and Monitoring Plan
 Port Gamble Bay Cleanup

ATTACHMENT F-1
SAMPLING AND ANALYSIS PLAN

ATTACHMENT F-1
SAMPLING AND ANALYSIS PLAN

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 Table F-1-2 Guidelines for Sample Handling and Storage

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- Attachment F-1-1 Sample Collection Forms

LIST OF ACRONYMS AND ABBREVIATIONS

°C	degrees Celsius
ASTM	American Society for Testing and Materials
CCV	continuing calibration verifications
cm	centimeter
COC	chain-of-custody
cPAH	carcinogenic polycyclic aromatic hydrocarbon
DGPS	differential global positioning system
DMMP	Dredge Material Management Program
Ecology	Washington State Department of Ecology
FC	Field Coordinator
GC/MS	gas chromatograph/mass spectrometer
HDPE	high-density polyethylene
mL	milliliter
MLLW	mean lower low water
MSS	Marine Sampling Systems
NAD83	North American Datum 1983
OMMP	<i>Operations, Maintenance, and Monitoring Plan</i>
PSEP	Puget Sound Estuary Program
QA/QC	quality assurance/quality control
QAPP	<i>Quality Assurance Project Plan</i>
SAP	<i>Sampling and Analysis Plan</i>
Site	Port Gamble Bay Cleanup Project Site
SMA	Sediment Management Area
SMS	Sediment Management Standards
USACE	U.S. Army Corp of Engineers
USEPA	U.S. Environmental Protection Agency

1 INTRODUCTION

This *Sampling and Analysis Plan* (SAP) describes sampling and analysis activities for long-term monitoring in Port Gamble Bay, Washington (the “Site”). This SAP is appended to the *Operations, Maintenance, and Monitoring Plan* (OMMP). Attachment F-2 of the OMMP is the *Quality Assurance Project Plan* (QAPP). This SAP provides information specific to the collection and analysis of intertidal and subtidal sediment core samples, and collection of surface sediment grab samples for Site-specific chemicals of concern (carcinogenic polycyclic aromatic hydrocarbons [cPAHs], dioxins/furans, and cadmium) and larval bioassays.

This document summarizes the sampling plan, field sampling methods, and analytical and biological laboratory procedures. This SAP was prepared following the Washington State Department of Ecology (Ecology) *Sediment Sampling and Analysis Plan Appendix* guidance document (Ecology 2008). Analytical quality assurance/quality control (QA/QC) procedures were also developed based on the analytical protocols and QA guidance of the Puget Sound Estuary Program (PSEP) and U.S. Environmental Protection Agency’s (USEPA’s) *EPA Contract Laboratory Program National Functional Guidelines for Data Review* (USEPA 1999, 2004). All sample handling and biological analyses will follow the most recent PSEP protocols (PSEP 1986 as updated in 1989, 1991, 1995, and 1997). Biological analyses will follow Sediment Management Standards (SMS) Clarification Paper *Bioassay Endpoint Refinements: Bivalve Larval and Neanthes Growth Bioassays* (Kendall 2013).

2 SAMPLE PROCESS DESIGN

Long-term surveys and sampling and analysis plans for the Site are summarized in Sections 2.1 through 2.4.

2.1 Field Surveys

Field surveys will be conducted in the subtidal, intertidal, and upland areas to determine the stability of the Site following construction. Immediately following construction completion, a comprehensive survey will be performed to document post-construction elevations. The post-construction survey will be subsequently compared to monitoring surveys. Bathymetric and topographic survey elements will be integrated into a single elevation contour surface to allow for comparison of the post-construction elevations. For consistency, the bathymetric and topographic surveys will be performed in accordance with applicable guidance.

Bathymetric survey will be performed using multi-beam survey equipment in subtidal and lower intertidal areas to determine mudline elevations. The multi-beam surveys will be conducted by a licensed surveyor and will meet or exceed the accuracy standards of +/- 0.2 feet as referenced in the U.S. Army Corp of Engineers (USACE) Hydrographic Survey Manual, April 2004 Revision (USACE 2004).

Topographic surveys will be conducted in the upper intertidal and upland Site areas to identify changes in elevations. For upper intertidal cap areas not included in the bathymetric survey, a topographic survey will be performed using established control points as part of long-term monitoring to identify changes in shoreline sloping cap elevations. The topographic surveys will be conducted by a licensed surveyor and will meet or exceed the accuracy standards of +/- 0.1 foot as referenced in the USACE Control and Topographic Surveying Manual, January 2007 (USACE 2007).

Following the completion of the bathymetric and topographic surveys, a licensed surveyor will integrate the bathymetric and topographic elevation contours into a single set of elevation contours. These contours will then be evaluated by Computer Aided Drafting isopach methodology. This comparison will be used to identify zones of accretion, settlement, or erosion.

2.2 Sediment Cap Physical Integrity Core Collection and Processing

As discussed in the OMMP, sediment core sampling may be performed in the intertidal and/or subtidal cap areas where topographic and/or bathymetric survey data suggest possible cap settlement and/or erosion of cap thicknesses. At these locations, cores would be advanced to a minimum depth of 1 foot below the cap thicknesses described in the Engineering Design Report.

2.3 Sediment Cap Quality Confirmation Monitoring

Surface sediment quality monitoring will be conducted at six designated sentinel intertidal and subtidal sampling stations composed of 5-point aliquots representative of the sediment management area (SMA)-1 and SMA-2 cap areas (see Figures F-3 and F-4 of the accompanying OMMP). Samples will be collected using a van Veen grab sampler or equivalent deployed from a winch line on a sampling vessel. The sediment samples will be collected from the 0- to 10-centimeters (cm) biologically active zone, composited, and submitted for analysis of cPAHs, dioxin/furans, cadmium, and larval bioassays.

2.4 Natural Recovery Sediment Quality Monitoring

Surface sediment recovery sampling will be performed at a total of 12 sentinel monitoring locations in SMA-3, SMA-4, and SMA-5 (see Figure F-14 of the accompanying OMMP) to verify natural recovery at the Site. Samples will be collected using a van Veen grab sampler or equivalent deployed from a winch line on a sampling vessel. The sediment samples will be collected from the 0- to 2-cm and 2- to 10-cm intervals; homogenized; submitted for cPAH, dioxin/furan, and cadmium analysis; and compared to baseline (2014) concentrations to characterize surface sediment natural recovery trends. The frequency of the long-term natural recovery monitoring at the Site is defined in the OMMP.

3 SAMPLING METHOD REQUIREMENTS

This section addresses the sample collection and processing procedures that will be used to ensure data quality from sample collection to sample processing. Specifically, this section describes collection, subsampling, compositing, sample scheduling, positioning, identification, field QA, and waste management.

3.1 Sediment Cap Physical Integrity Core Collection and Processing

Sections 3.1.1 and 3.1.2 describe the collection, processing, and handling procedures for the collection of sediment core samples.

3.1.1 Sediment Cap Physical Integrity Core Collection Procedures

As discussed in the OMMP, sediment cores will be collected using vibracore or other similar methods at intertidal and/or subtidal locations as may be identified from the topographic/bathymetric surveys. The vibracore will use a rigid external tube approximately 4 inches in diameter and may use either polycarbonate liners or a dedicated aluminum tube. The vibracore will be lowered to the cap surface, where the unit will then be energized and allowed to penetrate. The cores will be advanced to a minimum depth of approximately 1 foot below the below the cap design thickness. Acceptance criteria for a sediment core sample are as follows:

- The core penetrated and retained sediment material underlying the cap. If core refusal occurs before the required depth, an additional core will be advanced within 6 inches of the original position. Relocations will be made along depth contours generally parallel to the shore.
- Recovery was at least 75% of the length of core penetration.
- Cored material did not extend out the top of the core tube or contact any part of the sampling apparatus at the top of the core tube.
- There were no obstructions in the cored material that might have blocked the subsequent entry of sediment into the core tube and resulted in incomplete core collection.

The following procedure will be used to decontaminate core sample tubes prior to use:

- Rinse and pre-clean with tap water
- Wash and scrub in a solution of laboratory grade, non-phosphate-based soap and tap water
- Rinse with tap water
- Rinse three times with distilled water
- Seal both ends of each core tube with aluminum foil

The core tube caps will be removed immediately prior to placement into the coring device. Care will be taken during sampling to avoid contact of the sample tube with potentially contaminated surfaces. Extra sample tubes will be available during sampling operations for uninterrupted sampling in the event of a potential core tube breakage or contamination. Core tubes suspected to have been accidentally contaminated will not be used. Logs and field notes of all core samples will be maintained as samples are collected and correlated to the sampling location map. The following information will be included in the logs:

- Elevation of each station sampled as measured from mean lower low water (MLLW)
- Location of each station as determined by differential global positioning system (DGPS)
- Date and time of collection of each sediment core sample
- Names of Field Coordinator (FC) and person(s) collecting and handling the sample
- Observations made during sample collection including complications and other details associated with the sampling effort
- The sample station identification
- Length and depth intervals of each core section and estimated recovery for each sediment sample as measured from MLLW
- Qualitative notation of apparent resistance of sediment column to coring
- Any deviation from the approved SAP

3.1.2 Sediment Cap Physical Integrity Core Processing Procedures

The core processing station will either be located at an upland location adjacent to the Site or at the analytical laboratory. Transported cores will be handled consistent with American Society for Testing and Materials (ASTM 2007) procedures (ASTM D 4220) and stored

upright in the analytical laboratory refrigerators or on site until processed. Filled sample containers will be stored in coolers containing ice to maintain the samples at 4 degrees Celsius ($^{\circ}\text{C}$) $\pm 2^{\circ}\text{C}$ until delivery or shipping to the analytical laboratory.

All working surfaces and instruments will be thoroughly cleaned, decontaminated, and covered with aluminum foil to minimize outside contamination between sampling events. Disposable gloves will be discarded after processing each station and replaced prior to handling decontaminated instruments or work surfaces.

The steps for processing the samples are as follows:

1. Cut core longitudinally using a circular saw or power shears, taking care not to penetrate the sediment while cutting.
2. Use decontaminated utensils to split the core to expose the center of the two halves for sampling.
3. Photograph the entire length of the core.
4. Record the description of the core sample on the core log form for the following parameters as appropriate and present:
 - Sample recovery (depth in feet of penetration and sample compaction)
 - Physical soil description in accordance with the Unified Soil Classification System (includes soil type, density/consistency of soil, and color)
 - Odor (e.g., hydrogen sulfide or petroleum)
 - Vegetation
 - Debris
 - Biological activity (e.g., detritus, shells, tubes, bioturbation, or live or dead organisms)
 - Visual stratification, structure, and texture
 - Presence of oil sheen
 - Any other distinguishing characteristics or features

3.2 Sediment Cap Quality Confirmation Monitoring Collection and Processing

Sections 3.2.1 and 3.2.2 describe the collection, processing, and handling procedures for the collection of surface sediment samples for bioassay recovery and chemicals of concern monitoring.

3.2.1 Sediment Cap Quality Confirmation Monitoring Sample Collection Procedures

As discussed in the OMMP, surface sediment grab samples will be conducted at six designated sentinel intertidal and subtidal stations in SMA-1 and SMA-2, each composed of 5-point aliquots from the 0- to 10-cm interval. Samples from each location will be archived and also composited for each sentinel location and submitted for chemical (i.e., cPAHs, dioxins/furans, and cadmium) and larval bioassay analyses. In addition, location BW-15 within SMA-3 will be submitted for larval bioassay analyses, which will be collected from a single 0- to 10-cm grab sample (not a 5-point composite). Samples will be collected using a van Veen type hydraulic power grab sampler, in accordance with PSEP protocols (1997). The target locations and coordinates for each sentinel station are included in Table F-1-1. Samples will be collected in the following manner in accordance with the PSEP protocols:

- The vessel will be maneuvered to the proposed location.
- The sampler will be decontaminated.
- The sampler will be deployed to the bottom.
- The winch cable to the grab sampler will be drawn taut and vertical.
- Location coordinates of the cable hoist will be recorded by the location control person.
- The sediment sample will be retrieved aboard the vessel and evaluated against the following PSEP acceptability criteria:
 - Grab sampler is not overfilled (i.e., sediment surface is not against the top of the sampler).
 - Sediment surface is relatively flat, indicating minimal disturbance or winnowing.
 - Overlying water is present, indicating minimal leakage.
 - Overlying water has low turbidity, indicating minimal sample disturbance.
 - Desired penetration depth of at least 10 cm is achieved.

- Overlying water will be siphoned off.
- Observations (i.e., texture, odor, presence/absence of vegetation, debris, and any other distinguishing characteristics) will be recorded on the sample collection forms (Attachment F-1-1).
- A stainless steel trowel or similar device will be used to collect the top 10 cm of sediment, taking care not to collect sediment in contact with the sides of the sampling device, and placed in a stainless steel bowl.

Sediment samples that meet the above collection criteria will be processed as described below.

3.2.2 Sediment Cap Quality Confirmation Sample Processing Procedures

Sediment grab processing will be conducted aboard the sampling vessel. All working surfaces and instruments will be thoroughly cleaned, decontaminated, and covered with aluminum foil to minimize outside contamination between sampling stations. Disposable gloves will be discarded after processing each station and replaced prior to handling decontaminated instruments or work surfaces. The steps for processing the samples are as follows:

- Place the grab on a stable surface. Remove any overlying water using a syphon hose or turkey baster. Following grab acceptance criteria listed in Section 3.2.1, determine whether the grab is acceptable.
- After noting their presence, remove any large objects or debris from the sediment surface.
- Prior to sampling, color photographs may be taken, and a sediment description of each grab will be recorded on a grab sampling log form (Attachment F-1-1). Record the description of the grab sample on the grab log form for the following parameters as appropriate and present:
 - Sample recovery (depth in inches or centimeters of recovery in the grab sampler.
 - Physical soil description of the grab in accordance with the Unified Soil Classification System (includes soil type, density/consistency of soil, moisture, and color)
 - Odor (e.g., hydrogen sulfide and petroleum)

- Note any vegetation
 - Debris
 - Biological activity (e.g., detritus, shells, tubes, bioturbation, or live or dead organisms)
 - Presence of oil sheen
 - Any other distinguishing characteristics or features
- Using a clean spoon, place sample material from the top 10 cm for chemical and larval bioassay testing into a clean, stainless steel bowl or high-density polyethylene (HDPE) bucket. To avoid cross contamination, take care to remove only sediment that has not come into contact with the sides or bottom of the grab. Cover bowl with aluminum foil until each aliquot station has been collected.
 - After material has been collected from each aliquot station, the material will combined and homogenized until a uniform color and consistency is achieved.
 - Immediately after filling the sample container with sediment, place the screw cap on the sample container and tighten.
 - Thoroughly check all sample containers for proper identification, analysis type, and lid tightness.
 - Pack each container carefully to prevent breakage and place inside of a cooler with ice for storage at the proper temperature ($4^{\circ}\text{C} \pm 2^{\circ}\text{C}$ for all samples).

Samples will be submitted for testing as presented in Table F-1-1. In addition, sample mass will be collected at location BW-15 from within SMA-3, and submitted for larval bioassay analysis. The BW-15 bioassay sample will be collected from a single 0- to 10-cm grab sample (not a 5-point composite).

3.3 Natural Recovery Sediment Quality Monitoring Collection and Processing

Sections 3.3.1 and 3.3.2 describe the collection, processing, and handling procedures for the collection of surface sediment samples to evaluate natural recovery.

3.3.1 Natural Recovery Surface Sediment Sample Collection Procedures

The target locations and coordinates for each sentinel station are included in Table F-1-1. Samples will be collected in the following manner in accordance with the PSEP protocols:

- The vessel will be maneuvered to the proposed location.
- The sampler will be decontaminated.
- The sampler will be deployed to the bottom.
- The winch cable to the grab sampler will be drawn taut and vertical.
- Location coordinates of the cable hoist will be recorded by the location control person.
- The sediment sample will be retrieved aboard the vessel and evaluated against the following PSEP acceptability criteria:
 - Grab sampler is not overfilled (i.e., sediment surface is not against the top of the sampler).
 - Sediment surface is relatively flat, indicating minimal disturbance or winnowing.
 - Overlying water is present, indicating minimal leakage.
 - Overlying water has low turbidity, indicating minimal sample disturbance.
 - Desired penetration depth of at least 10 cm is achieved.
- Overlying water will be siphoned off.
- Observations (i.e., texture, odor, presence/absence of vegetation, debris, and any other distinguishing characteristics) will be recorded on the sample collection forms (Attachment F-1-1).
- A stainless steel trowel or similar device will be used to collect the top 0- to 2-cm and 5-to 10-cm of sediment, taking care not to collect sediment in contact with the sides of the sampling device, and placed in a stainless steel bowl.

Sediment samples that meet the above collection criteria will be processed as described below.

3.3.2 Natural Recovery Surface Sediment Sample Processing Procedures

Sediment grab processing will be conducted aboard the sampling vessel. All working surfaces and instruments will be thoroughly cleaned, decontaminated, and covered with aluminum foil to minimize outside contamination between sampling stations. Disposable gloves will be discarded after processing each station and replaced prior to handling decontaminated instruments or work surfaces. The steps for processing the samples are as follows:

- Place the grab on a stable surface. Remove any overlying water using a syphon hose or turkey baster. Following grab acceptance criteria listed in Section 3.3.1, determine whether the grab is acceptable.
- After noting their presence, remove any large objects or debris from the sediment surface.
- Prior to sampling, color photographs may be taken, and a sediment description of each grab will be recorded on a grab sampling log form (Attachment F-1-1). Record the description of the grab sample on the grab log form for the following parameters as appropriate and present:
 - Sample recovery (depth in inches or centimeters of recovery in the grab sampler.
 - Physical soil description of the grab in accordance with the Unified Soil Classification System (includes soil type, density/consistency of soil, moisture, and color)
 - Odor (e.g., hydrogen sulfide and petroleum)
 - Note any vegetation
 - Debris
 - Biological activity (e.g., detritus, shells, tubes, bioturbation, or live or dead organisms)
 - Presence of oil sheen
 - Any other distinguishing characteristics or features
- Using a clean spoon, place sample material from the 0- to 2-cm and 2- to 10-cm depths for chemical analyses in both intervals into separate clean, stainless steel bowls or HDPE buckets. To avoid cross contamination, take care to remove only sediment that has not come into contact with the sides or bottom of the grab. Cover bowl with aluminum foil until each aliquot station has been collected.
- After material has been collected from each aliquot station, the material will be combined and homogenized until a uniform color and consistency is achieved.
- Immediately after filling the sample container with sediment, place the screw cap on the sample container and tighten.
- Thoroughly check all sample containers for proper identification, analysis type, and lid tightness.

- Pack each container carefully to prevent breakage and place inside of a cooler with ice for storage at the proper temperature ($4^{\circ}\text{C} \pm 2^{\circ}\text{C}$ for all samples).

Samples will be submitted for testing as presented in Table F-1-1.

3.4 Sampling Schedule and Platform

Sampling will occur after approval of this SAP by Ecology as described in the OMMP. It is anticipated that mobilization, field sampling, sample processing, and demobilization will require approximately 2 to 3 days.

Collection of subsurface sediment cores and surface sediment grab samples will be conducted by Marine Sampling Systems (MSS) and overseen by Anchor QEA from a vessel properly equipped to deploy and recover a vibracorer and power grab and to provide the required navigation. The vibracore equipment is hydraulically driven, low-frequency, spring-loaded, and mounted on a sampling platform to ensure a vertical drive into the sediment. The vibracore is equipped with a piston device fitted into the upper portion of the core barrel to assist in recovery of soft surface material. The vibracore is also equipped with an inverse fathometer that displays real-time penetration within the wheelhouse to monitor penetration progress and determine refusal depth. The vessel will be operated by a licensed captain and will conform to U.S. Coast Guard regulations. The vessel captain and crew have extensive experience in subsurface core and surface grab collection in Puget Sound.

3.5 Horizontal Positioning and Vertical Control

Horizontal positioning will be determined using DGPS based on target coordinates shown in Table F-1-1. The horizontal datum will be North American Datum 1983 (NAD83), Washington State Plane, North Zone. Measured station positions will be converted to latitudinal and longitudinal NAD83 coordinates to the nearest 0.01 second. The accuracy of measured and recorded horizontal coordinates is typically less than 1 meter and will be within ± 3 meters following Ecology guidance.

The vertical elevation of each sediment sample or probe location will be measured using a fathometer or lead line and converted to MLLW correcting for the tidal elevation. Tidal

elevations will be determined after sample collection using National Oceanic and Atmospheric Administration's Bangor tide station.

3.6 Field Documentation

Field documentation will consist of a daily field log and sample collection forms (Attachment F-1-1). The daily field log is intended to provide sufficient data and observations to enable readers to reconstruct events that occurred during the sampling period. All data entries will be made using indelible ink pen. Corrections will be made by drawing a single line through the error, writing in the correct information, then dating and initialing the change. Examples of information to be recorded are field personnel, weather conditions, complications encountered, field communications, and other general details associated with the sampling effort. At a minimum, the following information will be included in this log:

- Names of the FC and person(s) collecting and logging the sample
- The sample station number
- Date and collection time of each sediment sample
- Observations made during sample collection including weather conditions, complications, communications, and other details associated with the sampling effort
- Qualitative notation of apparent resistance of sediment column to sampling, including notes on debris
- Any deviations from the approved SAP

In addition to maintaining a daily field log, sample collection forms will be completed for each sample. The sample collection forms will include standard entries for station identifiers, station coordinates, date and time of sample location, type of samples collected, type of analyses for each sample, and specific information pertaining to the matrix being collected. For sediment core samples, the collection form will include information regarding penetration of the sampler and physical characteristics of the sediment such as texture, color, odor, stratification, and sheens.

3.7 Sample Station Locations and Sample Identification

Figures F-3, F-4, and F-5 of the accompanying OMMP show the locations of the proposed surface sediment sampling locations. Table F-1-1 includes a list of all station locations, sample identifiers, and analysis and/or testing required for each location. The sample identification schemes are described below:

- Individual core samples are identified by alphanumeric ID used to identify the core location SMA, ITC to depict intertidal core location or STC to depict subtidal core location, followed by the number of feet below mudline (0-5) and appended with the date collected in the format YYMMDD (e.g., SMA1-ITC1-0-5-190901 for a core collected from SMA-1 on September 1, 2019 in the intertidal area from the 0- to 5-foot increment).
- Surface sediment grabs will be identified by alphanumeric ID used to identify the core location SMA; IT to depict intertidal, ST to depict subtidal, or NR to depict natural recovery location; followed by the depth below mudline (0-10); followed by Comp for composite; and appended with the date collected in the format YYMMDD (e.g., SMA1-IT-0-10-Comp-190901 or SMA5-NR-2-10-Comp).

3.8 Equipment Decontamination Procedures

Sample containers, instruments, working surfaces, technician protective gear, and other items that may come into contact with sediment sample material must meet high standards of cleanliness. All equipment and instruments used that are in direct contact with the sediment collected for analysis must be made of glass, stainless steel, or HDPE and will be cleaned prior to each day's use and between sampling or compositing events.

Decontamination of all items will follow PSEP protocols. The decontamination procedure is:

- Scrub until free of visible sediment and rinse with site water
- Pre-wash rinse with tap water
- Wash with solution of tap water and Alconox soap (brush)
- Rinse with tap water
- Rinse three times with distilled water
- Cover (no contact) all decontaminated items with aluminum foil
- Store in clean, closed container for next use if not used immediately

3.9 Sample Containers for Analysis

The contract laboratory will provide certified, pre-cleaned, USEPA-approved containers for all chemistry samples. Sediment for bioassay testing will be placed in commercially available HDPE buckets that have been decontaminated as described in Section 3.8. Table F-1-2 lists container size, holding times, and preservation for the categories of analytes. At a minimum, each sample container will be labelled with the following information:

- Project name and number
- Sample identifier
- Date of collection
- Initials of field personnel responsible for sample collection
- Analyses required
- Preservative (if applicable)

3.10 Sample Transport and Chain-of-Custody Procedures

This section addresses the sampling program requirements for maintaining custody of the samples throughout the sample collection and shipping process and provides specific procedures for sample shipping.

3.10.1 Sample Custody Procedures

Samples are considered to be in one's custody if they are: 1) in the custodian's possession or view; 2) in a secured location (under lock) with restricted access; or 3) in a container that is secured with an official seal(s) such that the sample cannot be reached without breaking the seal(s).

Chain-of-custody (COC) procedures will be followed for all samples throughout the collection, handling, and analysis process. The principal document used to track possession and transfer of samples is the laboratory-provided COC form. Each sample will be represented on a COC form the day it is collected. All data entries will be made using indelible ink pen. Corrections will be made by drawing a single line through the error, writing in the correct information, then dating and initialing the change. Blank lines/spaces on the COC form will be lined-out and dated and initialed by the individual maintaining custody.

A COC form will accompany each cooler of samples to the analytical laboratories. Each person who has custody of the samples will sign the COC form and ensure that the samples are not left unattended unless properly secured. Copies of all COC forms will be retained in the project files.

3.10.2 Sample Shipping and Receipt Requirements

All samples will be shipped or hand delivered to the analytical laboratory no later than the day after collection. If samples are collected on Friday, they may be held until the following Monday for shipment, provided that this does not adversely impact holding time requirements. Specific sample shipping procedures are as follows:

- Each cooler or container containing the samples for analysis will be shipped via overnight delivery to the appropriate analytical laboratory. In the event that Saturday delivery is required, the FC will contact the analytical laboratory before 3 p.m. on Friday to ensure that the laboratory is aware of the number of coolers shipped and the airbill tracking numbers for those coolers. Following each shipment, the FC will call the laboratory and verify the shipment from the day before has been received and is in good condition.
- Coolant ice will be sealed in separate double plastic bags and placed in the shipping containers.
- Individual sample containers will be placed in a sealable plastic bag, packed to prevent breakage, and transported in a sealed ice chest or other suitable container.
- Glass jars will be separated in the shipping container by shock-absorbent material (e.g., bubble wrap) to prevent breakage.
- The shipping containers will be clearly labeled with sufficient information (name of project, time and date container was sealed, person sealing the container and consultant's office name and address) to enable positive identification.
- The shipping waybill number will be documented on all COC forms accompanying the samples.
- A sealed envelope containing COC forms will be enclosed in a plastic bag and taped to the inside lid of the cooler.

- A minimum of two signed and dated COC seals will be placed on adjacent sides of each cooler prior to shipping.
- Each cooler will be wrapped securely with strapping tape, labeled “Glass – Fragile” and “This End Up,” and will be clearly labeled with the laboratory’s shipping address and the consultant’s return address.

Upon transfer of sample possession to the analytical laboratory, the persons transferring custody of the sample container will sign the COC form. Upon receipt of samples at the laboratory, the shipping container seal will be broken and the receiver will record the condition of the samples on a sample receipt form. COC forms will be used internally in the laboratory to track sample handling and final disposition.

3.11 Waste Management

All sediment remaining after sampling will be washed overboard at the collection site prior to moving to the next sampling station. Any sediment spilled on the deck of the sampling vessel will be washed into the surface waters at the collection site.

All disposable sampling materials and personnel protective equipment used in sample processing, such as disposable coveralls, gloves, and paper towels, will be placed in heavy-duty garbage bags or other appropriate containers.

Sediment remaining after core processing and sampling will be collected in 55-gallon drums and consolidated. The 55-gallon drum area will be located in a secure area and labeled appropriately. After core processing is completed, a composite sample will be collected and analyzed to obtain representative data for sediment disposal profiling.

4 PHYSICAL AND CHEMICAL ANALYTICAL METHODS

This section summarizes the target physical and chemical analyses for the various media sampled. All sample analyses will be conducted in accordance with Ecology-approved methods. Prior to analysis, all samples will be maintained according to the appropriate holding times and temperatures for each analysis (Table F-1-2). Table F-2-1 of the accompanying QAPP (Attachment F-2) presents the proposed analytes, screening criteria, the analytical methods to be used, and the targeted detection limits for the evaluation of sediment.

Prior to the analysis of the samples, the laboratory will calculate method detection limits for each analyte of interest, where applicable. Method detection limits will be below the sediment criteria specified in Table F-2-1 of the accompanying QAPP (Attachment F-2), if technically feasible. To achieve the required detection limits, some modifications to the methods may be necessary. These modifications from the specified analytical methods will be provided by the laboratory at the time of establishing the laboratory contract and must be approved by Ecology prior to implementation.

4.1 Quality Assurance/Quality Control

Laboratory QC procedures, where applicable, include initial and continuing instrument calibrations, standard reference materials, laboratory control samples, matrix replicates, matrix spikes, surrogate spikes (for organic analyses), and method blanks. Table F-2-2 of the accompanying QAPP (Attachment F-2) summarizes the data quality objectives for precision, accuracy, and completeness. Table F-2-3 of the accompanying QAPP lists the frequency of analysis for laboratory QA/QC samples.

Results of the QC samples from each sample group will be reviewed by the analyst immediately after a sample group has been analyzed. All samples will be diluted and reanalyzed if target compounds are detected at levels that exceed their respective established calibration ranges. Any cleanups will be conducted prior to the dilutions. The QC sample results will be evaluated to determine if control limits have been exceeded. If control limits are exceeded in the sample group, the QA/QC Manager will be contacted immediately, and

corrective action (e.g., method modifications followed by reprocessing the affected samples) will be initiated prior to processing a subsequent group of samples.

4.1.1 Laboratory Instrument Calibration and Frequency

An initial calibration will be performed on each laboratory instrument to be used at the start of the project, after each major interruption to the analytical instrument, and when any ongoing calibration does not meet method control criteria. Calibration verification will be analyzed following each initial calibration and will meet method criteria prior to analysis of samples. Continuing calibration verifications (CCV) will be performed daily prior to any sample analysis to track instrument performance. The frequency of CCVs varies with method. For gas chromatograph/mass spectrometer (GC/MS) methods, one will be analyzed every 12 hours. For GC, metals, and inorganic methods, one will be analyzed for every ten field samples, or daily, whichever is more frequent. If the ongoing continuing calibration is out of control, the analysis must come to a halt until the source of the control failure is eliminated or reduced to meet control specifications. All project samples analyzed while instrument calibration was out of control will be reanalyzed.

Instrument blanks or continuing calibration blanks provide information on the stability of the baseline established. Continuing calibration blanks will be analyzed immediately prior to or immediately following continuing calibration verification at the instrument for each type of applicable analysis.

4.1.2 Laboratory Duplicates/Replicates

Analytical duplicates provide information on the precision of the analysis and are useful in assessing potential sample heterogeneity and matrix effects. Analytical duplicates and replicates are subsamples of the original sample that are prepared and analyzed as a separate sample.

4.1.3 Matrix Spikes/Matrix Spike Duplicates

Analysis of matrix spike samples provides information on the extraction efficiency of the method on the sample matrix. By performing duplicate matrix spike analyses, information on the precision of the method is also provided for organic analyses.

4.1.4 Method Blanks

Method blanks are analyzed to assess possible laboratory contamination at all stages of sample preparation and analysis. The method blank for all analyses must be less than the method reporting limit of any single target analyte/compound. If a laboratory method blank exceeds this criterion for any analyte/compound, and the concentration of the analyte/compound in any of the samples is less than five times the concentration found in the blank (10 times for common contaminants), analyses must stop and the source of contamination must be eliminated or reduced.

4.1.5 Laboratory Control Samples

Laboratory control samples are analyzed to assess possible laboratory bias at all stages of sample preparation and analysis. The laboratory control sample is a matrix-dependent spiked sample prepared at the time of sample extraction along with the preparation of sample and matrix spikes. The laboratory control sample will provide information on the precision of the analytical process and, when analyzed in duplicate, will provide accuracy information as well.

4.2 Laboratory Report

The analytical laboratory will prepare detailed laboratory reports documenting all activities associated with the sample analyses. Included in this report will be:

- **Project Narrative:** A detailed report that describes the samples received, analyses performed, and corrective actions undertaken.
- **COC Documentation:** Laboratory policy requires that COC documentation be available for all samples received. The COC form will document basic sample demographics such as client and project names, sample identification, analyses requested, and special instructions.
- **Data Summary Form:** A tabular listing of concentrations and/or detection limits for all target analytes. The data report will also list other pertinent information such as amount of sample analyzed, dilution factors, sample processing dates, extract cleanups, and surrogate recoveries.

- **QA Summary:** Includes results of all QC analyses, specifically recovery information. Laboratory control samples are reported with each batch. Additional QC analyses may include laboratory replicates, matrix spikes, and standard reference materials.
- **Instrument Calibration Forms and Raw Data:** Includes initial and continuing calibration summaries and instrument tuning data, laboratory bench sheets, and logbook pages.

In completing chemical analyses for this project, the contract laboratory is expected to meet the following minimum requirements:

- Adhere to the methods outlined in this SAP, including methods referenced for each analytical procedure (Table F-2-1 of the accompanying QAPP [Attachment F-2])
- Deliver facsimile, hard copy, and electronic data as specified
- Meet reporting requirements for deliverables
- Meet turnaround times for deliverables
- Implement QA/QC procedures, including laboratory QC requirements (Table F-2-3 of the accompanying QAPP) and data quality objectives (Table F-2-2 of the accompanying QAPP), and performance evaluation testing requirements
- Notify the project QA/QC Manager of any QAPP QA/QC problems when they are identified to allow for quick resolution
- Allow laboratory and data audits to be performed, if deemed necessary

Laboratory data will be provided in the EQuIS electronic format. Laboratory data, which will be electronically provided and loaded into the database, will undergo a 10% check against the laboratory hard copy data. Data will be validated or reviewed manually, and qualifiers, if assigned, will be entered manually. The accuracy of all manually entered data will be verified by a second party. Data tables and reports will be exported from EQuIS to Microsoft Excel tables.

5 BIOLOGICAL TESTING

Bioassay testing will be performed by NewFields. Biological testing will be performed in accordance with *Recommended Protocols for Conducting Laboratory Bioassays on Puget Sound Sediments* (PSEP 1995) for the larval abnormality/mortality test using the resuspension modifications described in 2013 Dredge Material Management Program (DMMP)/SMS clarification paper (Kendall 2013). All bioassay analyses, including retests, are required to commence within 56 days after collection to meet holding times.

Bioassay testing requires that test sediments be matched and conducted simultaneously with appropriate reference sediment in order to factor out sediment grain size effects on bioassay organisms. The selection of the reference sediment will be based on the percent fines determined from the analytical laboratory's grain-size analysis of the test sediments. The laboratory determination of grain size will be performed on an expedited schedule in order to select the appropriate reference sediment prior to bioassay initiation.

The samples for bioassay testing will be placed into lidded HDPE buckets with no head space and stored in coolers at approximately $4^{\circ}\text{C} \pm 2^{\circ}\text{C}$ until transported to the laboratory. Temperature within the coolers will be monitored, and COC procedures will be followed throughout sample handling by the laboratory.

5.1 Biological Testing Procedures

Specific procedures for the bioassay are summarized in the following sections. As indicated above, the bioassay methodologies will follow those described in *Recommended Guidelines for Conducting Laboratory Bioassays on Puget Sound Sediment* (PSEP 1995), as modified by DMMP/SMS Clarification Paper (Kendall 2013).

5.1.1 Larval Bioassay

This test monitors development of the bivalve larvae. The test is run until the appropriate stage of development is reached in the seawater control. This endpoint is variable and may occur in more than 48 hours. At the end of the test, larvae from each test sediment exposure are examined to quantify abnormality and mortality. Bivalve larval tests will be conducted using the recommended test species *Mytilus galloprovincialis*. To avoid false negatives due

to high concentrations of fines, wood waste, or other flocculant material potentially present in Port Gamble sediments, the resuspension protocol (Kendall 2013) will be used in lieu of the standard PSEP protocol termination procedure. The resuspension test will be initiated and conducted in a manner similar to the standard PSEP method. For the resuspension termination protocol, the contents of the test chamber are gently resuspended using a perforated plunger at approximately 42 hours from test initiations to resuspend larvae that may be buried in significant layers of sediment on the bottom, which may result in reference failure of false positives.

The seawater control has a performance standard of 30% combined mortality and abnormality. The reference sediment has a performance standard of 35% combined mortality and abnormality normalized to the seawater control. Initial counts will be made for a minimum of five 10-milliliter (mL) aliquots. Final counts for seawater control, reference sediment, and test sediments will be made on 10-mL aliquots. Ammonia or sulfides toxicity may interfere with test results for this bioassay. Aeration will be conducted to minimize these effects and all test chambers will be allowed to equilibrate for 4 hours prior to inoculation with embryos.

5.2 Test Quality Assurance/Quality Control

Sediment toxicity tests will incorporate standard QA/QC procedures to ensure that the test results are valid. Standard QA/QC procedures include the use of negative controls, positive controls, reference sediment samples, replicates, and measurements of water quality during testing.

5.2.1 Negative Controls

The negative control to be used for the sediment toxicity tests will be a clean control, which consists of using the same seawater used in testing sediment toxicity. For the tests to be used in this study, the negative control will be a seawater control. For the sediment test results to be valid, the seawater control shall have a 70% normal survivorship at time-final.

5.2.2 Positive Controls

A positive control will be run for each bioassay using the same batch of organisms used in the test. The positive control to be used for the sediment toxicity test will be a toxic control in which a reference toxicant is used to establish the relative sensitivity of the test organism. The positive control for sediment tests is typically conducted with diluent seawater and without sediment. Copper sulfate will be used as the reference toxicant for the bivalve larval test.

5.2.3 Reference Sediment

Reference sediment will also be included with each bioassay, tested concurrently with test sediments to provide data that can be used to separate toxicant effects from unrelated effects, such as those of sediment grain size. Reference sediment samples should be collected from an area documented to be free from chemical contamination and should represent the range of important characteristics of the test sediments (e.g., sediment grain size). For this study, reference sediment samples will be collected from Carr Inlet in Puget Sound, Washington (PSEP 1995). All bioassays have performance standards for reference sediments as mentioned above. Failure to meet these standards may result in the requirement to retest.

5.2.4 Replicates

Five replicate chambers for each test sediment, reference sediment, and negative controls treatment will be run for each bioassay. A water quality replicate will also be run for each treatment.

5.2.5 Water Quality Monitoring

Water quality monitoring will be conducted for the larval bioassay and reference toxicant tests. This monitoring consists of daily measurements in the water quality replicate of salinity, temperature, pH, and dissolved oxygen for the larval tests. Ammonia and sulfides in the overlying water will be determined at test initiation and termination for all three tests. Monitoring will be conducted for all test and reference sediments and negative controls (including seawater controls). Measurements for each treatment will be made on a separate

test chamber that is set up identically to the other replicates within the treatment group, including the addition of test organisms.

5.3 Interpretation

Test interpretation consists of endpoint comparisons of test sediments to the measurements observed in the controls and in reference sediments on an absolute percentage basis, as well as statistical comparison between the test and reference endpoints, where appropriate. The SMS criteria for the larval test are exceeded if the larval test sediment has a mean survivorship of normal larvae that is significantly less (t-test, $P=0.1$) than the mean normal survivorship in the reference sediment, and the mean normal survivorship in the test sediment is less than 85% of the mean normal survivorship in the reference sediment.

5.4 Bioassay Retest

Any bioassay retests must be fully coordinated with and approved by Ecology.

5.5 Data Deliverables

The laboratory conducting the bioassay tests will be responsible for internal checks on data reporting and will correct errors identified during the QA review. The bioassay laboratory for this study will be required to report results that include all information recommended by PSEP protocols for QA review, as follows:

- A description of any deviations from the methodology or problems with the process and procedures of analyses
- Test methods used for bioassay testing and statistical analyses
- Results for mortality and abnormalities, water quality parameters, reference toxicant, and statistical analyses
- Original data sheets for water quality, mortality and abnormalities, reference toxicant, and statistical analyses
- COC records

Close contact with the laboratory will be maintained to resolve any QA/QC problems in a timely manner.

6 SAMPLING AND ANALYSIS RESULTS REPORT

A final sampling and analysis results report will be prepared by Anchor QEA documenting all activities associated with collecting, compositing, transporting, and chemically and biologically analyzing sediment samples. The laboratory reports will be included as appendices and the chemistry report will be submitted in both hard copy and electronic formats. At a minimum, the following will be included in the final report:

- Summary of all field activities including a description of any deviations from the approved SAP
- Locations of sediment sampling stations in state plane coordinates to the nearest foot (Washington North Zone), and in latitude and longitude in degrees and minutes to four decimal places NAD83; all vertical elevations of mudline and water surface will be reported to the nearest 0.1-foot relative to MLLW
- A project map with actual sampling locations
- A QA/QC narrative for chemical, and if appropriate, biological testing
- Summary data results tables
- Summary of comparison of chemical and toxicity test results with DMMP interpretive criteria
- Print copies of field data will be provided with the data report; laboratory analysis results and associated QA/QC data will be available
- Results will be submitted to the Ecology in EIM format
- Source sampling and/or supplier locations for all bioassay testing species utilized for testing

7 REFERENCES

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TABLES

**Table F-1-1
Station Locations and Sample Matrix Summary for Samples**

Location ID	Archive	Station Coordinates		Parameter	Cadmium	PAHs	Dioxin/Furan	Larval Bioassay
	8-oz glass	(Washington SP NAD 83 North Zone)		Container	4-oz glass	16-oz glass	8-oz glass	1-Gallon
	4° C	Easting	Northing	Preservative	4° C	4° C	4° C	4° C
				Sample ID				
Capping Areas								
SMA1-IT1	X	1211536.9	317657.5	SMA1-IT-0-10-Comp	X	X	X	X
SMA1-IT2	X	1211387.1	317532.1					
SMA1-IT3	X	1211362.1	317392.9					
SMA1-IT4	X	1211653.4	317220.0					
SMA1-IT5	X	1211828.0	317160.3					
SMA1-ST1	X	1211453.2	317498.9	SMA1-ST-0-10-Comp	X	X	X	X
SMA1-ST2	X	1211632.0	317620.4					
SMA1-ST3	X	1211707.7	317378.5					
SMA1-ST4	X	1211702.4	317282.3					
SMA1-ST5	X	1211836.8	317246.7					
SMA2A-IT1	X	1211603.1	316658.1	SMA2A-IT-0-10-Comp	X	X	X	X
SMA2A-IT2	X	1211497.5	316592.4					
SMA2A-IT3	X	1211352.5	316505.4					
SMA2A-IT4	X	1211227.8	316419.7					
SMA2A-IT5	X	1211176.0	316281.5					
SMA2A-ST1	X	1211476.2	316243.4	SMA2A-ST-0-10-Comp	X	X	X	X
SMA2A-ST2	X	1211592.1	316375.6					
SMA2A-ST3	X	1211789.4	316463.6					
SMA2A-ST4	X	1211508.5	316012.2					
SMA2A-ST5	X	1211733.4	316185.2					
SMA2B-IT1	X	1211168.2	316122.8	SMA2B-IT-0-10-Comp	X	X	X	X
SMA2B-IT2	X	1211160.4	315957.5					
SMA2B-IT3	X	1211155.9	315740.1					
SMA2B-IT4	X	1211095.5	315626.6					
SMA2B-IT5	X	1211047.0	315492.7					
SMA2B-ST1	X	1211306.1	315846.5	SMA2B-ST-0-10-Comp	X	X	X	X
SMA2B-ST2	X	1211662.2	315810.9					
SMA2B-ST3	X	1211509.9	315740.0					
SMA2B-ST4	X	1211334.8	315451.2					
SMA2B-ST5	X	1211564.0	315510.2					
Natural Recovery								
BW-01	--	1211482.1	312628.3	BW-01-0-2	X	X	X	--
				BW-01-2-10	X	X	X	--
BW-04	--	1212480.62	310620.97	BW-01-0-2	X	X	X	--
				BW-01-2-10	X	X	X	--
BW-15	--	1212507.8	308614.9	BW-15-0-2	X	X	X	X
				BW-15-2-10	X	X	X	(Sample ID: BW-15-0-10)
BW-18	--	1210996.74	307610.05	BW-01-0-2	X	X	X	--
				BW-01-2-10	X	X	X	--
BW-19	--	1212456.51	307658.08	BW-01-0-2	X	X	X	--
				BW-01-2-10	X	X	X	--

**Table F-1-1
Station Locations and Sample Matrix Summary for Samples**

Location ID	Archive	Station Coordinates (Washington SP NAD 83 North Zone)		Parameter	Cadmium	PAHs	Dioxin/Furan	Larval Bioassay
	8-oz glass			Container	4-oz glass	16-oz glass	8-oz glass	1-Gallon
	4° C	Easting	Northing	Preservative	4° C	4° C	4° C	4° C
				Sample ID				
BW-21	--	1212475.8	305744.0	BW-21-0-2	X	X	X	--
				BW-21-2-10	X	X	X	--
PGSS-29	--	1210493.1	309872.8	PGSS-29-0-2	X	X	X	--
				PGSS-29-2-10	X	X	X	--
PGSS-70	--	1210966.3	313616.1	BW-01-0-2	X	X	X	--
				BW-01-2-10	X	X	X	--
PGSS-77A	--	1211303.7	314627	BW-01-0-2	X	X	X	--
				BW-01-2-10	X	X	X	--
PGSS-8	--	1211006	305614.9	BW-01-0-2	X	X	X	--
				BW-01-2-10	X	X	X	--
PGST-1	--	1211635.1	312628.3	PGST-1-0-2	X	X	X	--
				PGST-1-2-10	X	X	X	--
PGST-5	--	1212132.5	308615.3	PGST-2-0-2	X	X	X	--
				PGST-2-2-10	X	X	X	--

Notes:
IT = Intertidal
PAHs = polycyclic aromatic hydrocarbons
ST = Subtidal

**Table F-1-2
Guidelines for Sample Handling and Storage**

Parameter	Sample Size	Container Size and Type^a	Holding Time	Preservative
Total metals	50 g	4-oz Glass	6 months; 28 days for Hg	Cool/4° C
			3 years; 28 days for Hg	Freeze ^a /-18° C
Polycyclic aromatic hydrocarbons	150 g	16-oz glass	14 days until extraction	Cool/4° C
			1 year until extraction	Freeze/-18° C
			40 days after extraction	Cool/4° C
Dioxins/Furans	150 g	8-oz Glass	1 year to extraction	Freeze -18° C
			1 year after extraction	Freeze -18° C
Bivalve larvae	1,000 g	1-gallon HDPE	56 days	Cool/4° C/Dark

Note:

a. All sample containers will have lids with Teflon inserts.

ATTACHMENT F-1-1
SAMPLE COLLECTION FORMS



Sediment Core Collection Log

Job: _____
 Job No: _____
 Field Staff: _____
 Contractor: _____
 Vertical Datum: _____

Station ID: _____
 Attempt No. _____
 Date: _____
 Logged By: _____
 Horizontal Datum: _____

Field Collection Coordinates:
 Lat/Northing: _____

Long/Easting: _____

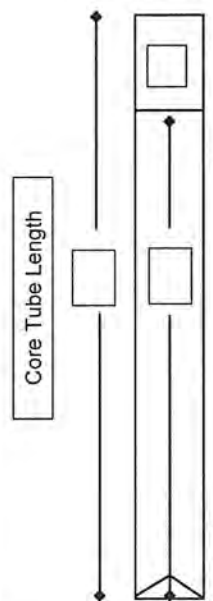
A. Water Depth
 DTM Depth Sounder: _____
 DTM Lead Line: _____

B. Water Level Measurements
 Time: _____
 Height: _____
 Source: _____

C. Mudline Elevation

Core Collection Recovery Details:
 Core Accepted: Yes / No
 Core Tube Length: _____
 Drive Penetration: _____
 Headspace Measurement: _____
 Recovery Measurement: _____
 Recovery Percentage: _____
 Total Length of Core To Process: _____

Recovery Measurements (prior to cuts)



Sections To Process:

A: _____
 B: _____
 C: _____
 D: _____

Drive Notes:

Core Field Observations and Description:

Sediment type, moisture, color, minor modifier, MAJOR modifier, other constituents, odor, sheen, layering, anoxic layer, debris, plant matter, shells, biota

Notes:

Sediment Core Processing Log



Job: _____
 Job No. _____
 No. of Sections: _____
 Drive Length: _____
 Recovery: _____
 % Recovery: _____
 Notes: _____

Station ID: _____
 Date/Time: _____
 Core Logged By: _____
 Attempt #: _____
 Type of Core Mudmole Vibracore Other
 Diameter of Core (inches) _____
 Core Quality Good Fair Poor Disturbed

Recovered Length (ft)	Size % G	Size % S	Size % F	PID	Classification and Remarks (Density, Moisture, Color, Minor Constituent, MAJOR Constituent, with Additional Constituents, Sheen, Odor)	Sample	Subsample	Summary Sketch

ATTACHMENT F-2
QUALITY ASSURANCE PROJECT PLAN

ATTACHMENT F-2
QUALITY ASSURANCE PROJECT PLAN

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LIST OF ACRONYMS AND ABBREVIATIONS

ARI	Analytical Resources, Inc.
ASTM	American Society of Testing and Materials
COC	chain-of-custody
DQO	data quality objective
EC ₅₀	concentration of test substance in dilution water calculated to affect 50% of a test population during continuous exposure over a specified period of time
Ecology	Washington State Department of Ecology
FC	Field Coordinator
GC	gas chromatograph
HDPE	high-density polyethylene
LC ₅₀	lethal concentration of toxicant killing 50% of exposed organisms
MDL	method detection limit
MS	mass spectrometer
OMMP	<i>Operations, Maintenance, and Monitoring Plan</i>
PCB	polychlorinated biphenyl
PSEP	Puget Sound Estuary Program
QA	quality assurance
QAPP	<i>Quality Assurance Project Plan</i>
QC	quality control
RL	reporting limit
RPD	relative percent difference
SAP	<i>Sampling and Analysis Plan</i>
SDG	sample delivery group
SRM	standard reference material
USEPA	U.S. Environmental Protection Agency

1 INTRODUCTION

This *Quality Assurance Project Plan* (QAPP) establishes quality assurance (QA) objectives for sampling and analysis activities in Port Gamble Bay, as described in the accompanying *Sampling and Analysis Plan* (SAP; Attachment F-1 to the *Operations, Maintenance, and Monitoring Plan* [OMMP]). The methods and QA procedures described here will be followed by Anchor QEA and its contractors during long-term monitoring data collection activities beginning in 2019.

The goal of the QAPP is to ensure that data of sufficiently high quality are generated to support the project data quality objectives (DQOs). The QAPP will address project management responsibilities, sampling and analytical procedures, assessment and oversight, and data reduction, validation, and reporting.

Analytical QA/quality control (QC) procedures were developed based on the analytical protocols and quality assurance guidance of the Puget Sound Estuary Program (PSEP; 1986, 1995, 1997a, 1997b), the *Dredged Material Evaluation and Disposal Procedures* (DMMO 2013) and the *EPA Contract Laboratory Program National Functional Guidelines for Data Review* (USEPA 1999, 2004, 2005, 2008).

2 SAMPLE CUSTODY AND SHIPPING REQUIREMENTS

Samples are considered to be in one's custody if they are: 1) in the custodian's possession or view; 2) in a secured location (under lock) with restricted access; or 3) in a container that is secured with an official seal(s) such that the sample cannot be reached without breaking the seal(s).

Chain-of-custody (COC) procedures will be followed for all samples throughout the collection, handling, and analysis process. The principal document used to track possession and transfer of samples is the COC form. Each sample will be represented on a COC form the day it is collected. All data entries will be made using indelible ink pen. Corrections will be made by drawing a single line through the error, writing in the correct information, then dating and initialing the change. Blank lines and spaces on the COC form will be lined-out, dated, and initialed by the individual maintaining custody.

A COC form will accompany each shipment of samples to the analytical laboratory. Each person who has custody of the samples will sign the COC form and ensure that the samples are not left unattended unless properly secured. Copies of all COC forms will be retained in the project files.

All samples will be shipped, couriered, or hand-delivered to the analytical laboratory as soon as possible. Samples collected on Friday may be held until the following Monday for shipment provided that this delay does not jeopardize any hold time requirements. Specific sample shipping procedures are as follows:

- Each sample cooler or container will be shipped via overnight delivery to the appropriate analytical laboratory or picked up by the laboratory courier. In the event that Saturday delivery is required, the Field Coordinator (FC) will contact the analytical laboratory before 3 p.m. on Friday to ensure that the laboratory is aware of the number of containers shipped and the airbill tracking numbers for those containers. Following each shipment, the FC or QA/QC Manager will verify the shipment from the day before has been received and is in good condition.
- The samples for bioassay testing will be placed into lidded high-density polyethylene (HDPE) buckets with no head space and stored in coolers at approximately $4^{\circ} \pm 2^{\circ}\text{C}$

until transported to the laboratory. Temperature within the coolers will be monitored, and COC procedures will be followed throughout sample handling by the laboratory.

- Ice will be sealed in separate plastic bags and placed in the shipping containers.
- Individual sample containers or groups of containers will be placed in sealable plastic bags, packed to prevent breakage, and transported in a sealed ice chest or other suitable container.
- Glass jars will be separated in the shipping container by shock-absorbent material (e.g., bubble wrap) to prevent breakage.
- Shipping containers will be clearly labeled with sufficient information (name of project, time and date container was sealed, person sealing the container, and consultant's office name and address) to enable positive identification.
- COC forms will be enclosed in a plastic bag and taped to the inside lid of the cooler.
- Each cooler will be wrapped securely with strapping tape, labeled "Glass – Fragile" and "This End Up," and will be clearly labeled with the laboratory's shipping address and the consultant's return address.

Upon transfer of sample possession to the analytical laboratory, the persons transferring custody of the sample container will sign the COC form. Upon receipt of samples at the laboratory, the receiver will record the condition of the samples on a sample receipt form. COC forms will be used internally in the laboratory to track sample handling and final disposition.

3 OVERVIEW OF DATA GENERATION AND ACQUISITION

The rationale for the sampling design and design assumptions for locating and selecting environmental samples is detailed in the accompanying SAP (Attachment F-1). The methods and procedures for collection of field samples are also provided in the accompanying SAP.

3.1 Chemical Analytical Methods

This section summarizes the target chemical analyses for the sediment samples. All sample analyses will be conducted in accordance with U.S. Environmental Protection Agency (USEPA)-approved methods. Prior to analysis, all samples will be maintained according to the appropriate holding times and temperatures for each analysis as defined in Table F-1-2 of the accompanying SAP (Attachment F-1). Table F-2-1 of this QAPP presents the proposed analytes, the analytical methods to be used, and the targeted reporting limits for the sediment chemical testing. The analytical laboratory will prepare detailed reports in accordance with this QAPP.

Prior to the analysis of the samples, the laboratory will calculate method detection limits for each analyte of interest, where applicable. Method detection limits will be below the values specified in Table F-2-1.

Chemical testing will be conducted at Analytical Resources, Inc. (ARI). ARI is accredited under the Washington State Department of Ecology (Ecology) and the National Environmental Laboratories Accreditation Program. In completing chemical analyses for this project, the contract laboratory is expected to meet the following minimum requirements:

- Adhere to the methods outlined in this QAPP, including methods referenced for each analytical procedure (Table F-2-1)
- Deliver PDF and electronic data as specified
- Meet reporting requirements for deliverables
- Meet turnaround times for deliverables
- Implement QA/QC procedures including DQOs, laboratory QC requirements, and performance evaluation testing requirements

- Notify the project QA/QC Manager of any QA/QC problems when they are identified to allow for quick resolution
- Allow laboratory and data audits to be performed, if deemed necessary

4 QUALITY ASSURANCE/QUALITY CONTROL

This section describes DQOs and field and laboratory QA/QC requirements. The equipment calibration and maintenance requirements and the assessment of compliance and response actions are also discussed.

4.1 Data Quality Objectives and Criteria

The DQO for this project is to ensure that the data collected are of known and acceptable quality for project objectives described in the accompanying SAP (Attachment F-1) to be achieved. The quality of laboratory data is assessed by precision, accuracy, representativeness, comparability, and completeness (the “PARCC” parameters). Definitions of these parameters and the applicable QC procedures are presented below. Applicable quantitative goals for these data quality parameters are listed in Table F-2-2.

4.1.1 Precision

Precision is the ability of an analytical method or instrument to reproduce its own measurement. It is a measure of the variability, or random error, in sampling, sample handling, and laboratory analysis. The American Society of Testing and Materials (ASTM) recognizes two levels of precision: repeatability—the random error associated with measurements made by a single test operator on identical aliquots of test material in a given laboratory, with the same apparatus, under constant operating conditions—and reproducibility—the random error associated with measurements made by different test operators, in different laboratories, using the same method but different equipment to analyze identical samples of test material (ASTM 2002).

In the laboratory, “within-batch” precision is measured using replicate sample or QC analyses and is expressed as the relative percent difference (RPD) between the measurements. The “batch-to-batch” precision is determined from the variance observed in the analysis of standard solutions or laboratory control samples from multiple analytical batches.

Field precision will be evaluated by the collection of blind field duplicates for chemistry samples at a frequency of one in 20 samples. Field chemistry duplicate precision will be

screened against a RPD of 50% for sediment samples; however, no data will be qualified based solely on field homogenization duplicate precision.

Precision measurements can be affected by the nearness of a chemical concentration to the method detection limit (MDL), where the percent error (expressed as RPD) increases. The equation used to express precision is as follows:

$$\text{RPD} = \frac{(C_1 - C_2) \times 100\%}{(C_1 + C_2)/2} \quad (\text{Equation 4-1})$$

where:

- RPD = relative percent difference
- C₁ = larger of the two observed values
- C₂ = smaller of the two observed values

4.1.2 Accuracy

Accuracy is a measure of the closeness of an individual measurement (or an average of multiple measurements) to the true or expected value. Accuracy is determined by calculating the mean value of results from ongoing analyses of laboratory-fortified blanks, standard reference materials, and standard solutions. In addition, laboratory-fortified (i.e., matrix-spiked) samples are also measured, which indicates the accuracy or bias in the actual sample matrix. Accuracy is expressed as percent recovery of the measured value, relative to the true or expected value. If a measurement process produces results for which the mean is not the true or expected value, the process is said to be biased. Bias is the systematic error either inherent in a method of analysis (e.g., extraction efficiencies) or caused by an artifact of the measurement system (e.g., contamination). Analytical laboratories use several QC measures to eliminate analytical bias, including systematic analysis of method blanks, laboratory control samples, and independent calibration verification standards. Because bias can be positive or negative, and because several types of bias can occur simultaneously, only the net, or total, bias can be evaluated in a measurement.

Laboratory accuracy will be evaluated against quantitative matrix spike and surrogate spike recovery performance criteria provided by the laboratory. Accuracy can be expressed as a percentage of the true or reference value, or as a percent recovery in those analyses where reference materials are not available and spiked samples are analyzed. The equation used to express accuracy is as follows:

$$\%R = 100\% \times (S-U)/C_{sa} \quad (\text{Equation 4-2})$$

where:

- %R = percent recovery
- S = measured concentration in the spiked aliquot
- U = measured concentration in the unspiked aliquot
- C_{sa} = actual concentration of spike added

Field accuracy will be controlled by adherence to sample collection procedures outlined in the SAP.

4.1.3 Representativeness

Representativeness expresses the degree to which data accurately and precisely represent an environmental condition. For the Site, the list of analytes is inclusive of those that may be identified as contaminants of concern.

4.1.4 Comparability

Comparability expresses the confidence with which one dataset can be evaluated in relation to another dataset. For this program, comparability of data will be established through the use of standard analytical methodologies, reporting formats, and common traceable calibration and reference materials.

4.1.5 Completeness

Completeness is a measure of the amount of data that is determined to be valid in proportion to the amount of data collected. Completeness will be calculated as follows:

$$C = \frac{(\text{Number of acceptable data points}) \times 100}{(\text{Total number of data points})} \quad (\text{Equation 4-3})$$

The DQO for completeness for all components of this project is 95%. Data that have been qualified as estimated because the QC criteria were not met will be considered valid for the purpose of assessing completeness. Data that have been rejected will not be considered valid for the purpose of assessing completeness.

4.1.6 Sensitivity

Analytical sensitivities must be consistent with or lower than reporting limits listed in Table F-2-1 in order to demonstrate compliance with this QAPP.

The MDL is defined as the minimum concentration at which a given target analyte can be measured and reported with 99% confidence that the analyte concentration is greater than zero. Laboratory reporting limits (RLs) are defined as the lowest level that can be reliably achieved within specified limits of precision and accuracy during routine laboratory operating conditions. Laboratory RLs will be used to evaluate the method sensitivity or applicability prior to the acceptance of a method for this program.

The sample-specific RLs will be reported by the laboratory and will take into account any factors relating to the sample analysis that might decrease or increase the RL (e.g., dilution factor, percent moisture, sample volume, sparge volume). In the event that the RLs are elevated for a sample due to matrix interferences and subsequent dilution or reduction in the sample aliquot, the data will be evaluated by QA/QC Manager and the laboratory to determine if an alternative course of action is required or possible.

4.2 Field and Laboratory Quality Assurance and Quality Control

Field and laboratory activities must be conducted in such a manner that results meet specified quality objectives and are fully defensible. Guidance for QA/QC is derived from the protocols developed for Sediment Management Standards (Ecology 2013) and the Model Toxics Control Act (Ecology 2007), the USEPA Test Methods (1986), National Functional Guidelines (USEPA 1999, 2004, 2005, 2008), and the cited methods.

4.2.1 Field Quality Control

Anchor QEA personnel will identify and label samples in a consistent manner to ensure that field samples are traceable and that labels provide all information necessary for the laboratory to conduct required analyses properly. Samples will be placed in appropriate containers and preserved for shipment to the laboratory.

4.2.1.1 Sample Containers

Sample containers and preservatives will be provided by the laboratory. The laboratory will maintain documentation certifying the cleanliness of bottles and the purity of preservatives provided. Specific container requirements are included in the accompanying SAP (Attachment F-1).

4.2.1.2 Sample Identification and Labels

Each sample will have an adhesive plastic or waterproof paper label affixed to the container and will be labeled at the time of collection. The following information will be recorded on the container label at the time of collection:

- Project name
- Sample identification
- Date and time of sample collection
- Preservative type (if applicable)
- Analysis to be performed

Samples will be uniquely identified with a sample identification number. Specific sample identification schemes are provided in the accompanying SAP (Attachment F-1).

4.2.1.3 Field Quality Assurance Sampling

Field QA procedures will consist of following acceptable practices for collecting and handling samples. Adherence to these procedures will be complemented by periodic and routine equipment inspection.

Field QA samples will be collected along with environmental samples. Field QA samples are useful in identifying possible problems resulting from sample collection or sample processing in the field. Field QA samples will be homogenization duplicates collected at a frequency of one in 20 samples processed.

Field QA samples will also include the collection of additional sample volume to ensure that the laboratory has sufficient sample volume to run the program-required analytical QA/QC samples for analysis, as specified in Table F-2-3. Additional sample volume to meet this requirement will be collected at a frequency of one in 20 samples processed.

Equipment rinsate blanks will be collected at a frequency of one per sample collection equipment type per event as a part of these collection events.

All field QA samples will be documented in the field logbook and verified by the QA/QC Manager or a designee.

4.2.2 Laboratory Quality Control

Laboratory QC procedures, where applicable, include initial and continuing instrument calibrations, standard reference materials, laboratory control samples, matrix replicates, matrix spikes, method blanks, internal standards, and surrogate spikes. Table F-2-3 lists the frequency of analysis for laboratory QA/QC samples, and Table F-2-2 summarizes the DQOs for precision, accuracy, and completeness.

Results of the QC samples from each sample group will be reviewed by the analyst immediately after a sample group has been analyzed. The QC sample results will then be evaluated to determine if control limits have been exceeded. If control limits are exceeded in the sample group, the QA/QC Manager will be contacted immediately, and corrective action (e.g., method modifications followed by reprocessing the affected samples) will be initiated prior to processing a subsequent group of samples.

4.2.2.1 *Laboratory Instrument Calibration and Frequency*

An initial calibration will be performed at the frequencies outlined in Table F-2-3 for each analysis and laboratory instrument to be used and when any ongoing calibration does not meet method control criteria. A calibration verification will be analyzed following each initial calibration and will meet method criteria prior to analysis of samples. Continuing calibrations will be performed as required by the analytical method and as outlined in Table F-2-3. If the ongoing continuing calibration is out of control, the analysis must come to a halt until the source of the control failure is eliminated or reduced to meet control specifications. All project samples analyzed while the instrument calibration was out of control will be reanalyzed.

Instrument blanks or continuing calibration blanks provide information on the stability of the baseline established. Continuing calibration blanks will be analyzed immediately prior to or following continuing calibration verification at the instrument for each type of applicable analysis.

4.2.2.2 *Standard Reference Materials*

Standard reference materials (SRMs) are substances of the same or similar matrix to the project samples and contain a known concentration of target analyte(s). These materials are prepared and analyzed in the same manner as routine samples and in the same preparation and analytical batch. The recovery of the target analyte(s) provide information on interferences caused by the sample matrix. The Puget Sound SRM will be analyzed for carcinogenic polycyclic aromatic hydrocarbons, dioxin/furans, and cadmium for this project. SRM results will be evaluated using the DQOs outlined in Table F-2-2.

4.2.2.3 *Laboratory Duplicates/Replicates*

Analytical duplicates provide information on the precision of the analysis and are useful in assessing potential sample heterogeneity and matrix effects. Analytical duplicates and replicates are aliquots of the original samples that are prepared and analyzed as separate samples.

4.2.2.4 Matrix Spikes and Matrix Spike Duplicates

Analyses of matrix spike samples provide information on the preparation efficiency of the method on the sample matrix. By performing duplicate matrix spike analyses, information on the precision of the method is also provided.

4.2.2.5 Method Blanks

Method blanks are analyzed to assess possible laboratory contamination at all stages of sample preparation and analysis. The method blank for all analyses must contain less than the quantitation limit of any single target analyte/compound. Sample results may be reported if they are below detection or greater than five times the concentration detected in the method blank. If a laboratory method blank exceeds these criteria for any analyte/compound, analyses must stop, the source of contamination must be eliminated or reduced, and the affected samples must be reanalyzed.

4.2.2.6 Laboratory Control Samples

Laboratory control samples are analyzed to assess possible laboratory bias at all stages of sample preparation and analysis. The laboratory control sample is a matrix-dependent spiked sample prepared at the time of sample extraction along with the preparation of sample and matrix spikes and/or duplicates. The laboratory control sample will provide information on the accuracy of the analytical process and, when analyzed in duplicate, will provide precision information as well.

4.2.2.7 Laboratory Deliverables

Data packages will be checked for completeness immediately upon receipt from the laboratory to ensure that data and QA/QC information requested are present. Data quality will be assessed on the following based on this QAPP and National Functional Guidelines (USEPA 1999, 2004, 2005, 2008):

- Holding times and sample receipt conditions
- All compounds of interest reported
- RLs
- Matrix spike/matrix spike duplicate results

- Laboratory control samples/laboratory control sample duplicates
- SRM results
- Method blanks
- Internal standard recoveries
- Surrogate standard recoveries
- Initial calibrations
- Calibration verifications
- Instrument performance checks
- Dual-column confirmation results

4.3 Bioassay Test Quality Assurance/Quality Control

Sediment toxicity tests will incorporate standard QA/QC procedures to ensure that the test results are valid. Standard QA/QC procedures include the use of negative controls, positive controls, reference sediment samples, replicates, and measurements of water quality during testing.

4.3.1 Negative Controls

The negative control to be used for both sediment toxicity tests will be a clean control, which consists of clean, inert material and the same seawater used in testing sediment toxicity. For the tests to be used in this study, the negative control will be the amphipod collection site sediment, which will most likely be clean sand. The negative control for the bivalve larval test will be a seawater control.

4.3.2 Positive Controls

An appropriate reference toxicant will be run with each batch of test sediments as a positive control to establish the relative sensitivity of the test organisms. The positive control for sediment tests is typically conducted with diluent seawater and without sediment. The LC₅₀

or the EC₅₀ must be within the 95% confidence interval of responses expected for the toxicant used¹.

4.3.3 Reference Sediment

Reference sediment will also be included with each bioassay, tested concurrently with test sediments to provide data that can be used to separate toxicant effects from unrelated effects, such as those of sediment grain size. Reference sediment samples should be collected from an area documented to be free from chemical contamination and should represent the range of important natural, physical, and chemical characteristics of the test sediments (e.g., sediment grain size and total organic carbon). For this study, reference sediment samples will be collected from Carr Inlet in Puget Sound, Washington (PSEP 1995). All bioassays have performance standards for reference sediments as mentioned above. Failure to meet these standards may result in the requirement to retest.

4.3.4 Replicates

Five replicate chambers for each test sediment, reference sediment, and negative control treatments will be run for each bioassay. A water quality replicate will also be run for each treatment.

4.3.5 Water Quality Monitoring

Water quality monitoring will be conducted for the amphipod, larval, and juvenile polychaete bioassays and reference toxicant tests. This monitoring consists of daily measurements in the water quality replicate of salinity, temperature, pH, and dissolved oxygen for the amphipod and larval tests. These measurements will be made every three days for the juvenile polychaete bioassay, with the exception of dissolved oxygen, which will be measured daily. Ammonia and sulfides in the overlying water will be determined at test initiation and termination for all three tests. Monitoring will be conducted for all test and reference sediments and negative controls (including seawater controls). Measurements for

¹ LC₅₀ is the lethal concentration of toxicant killing 50% of exposed organisms. EC₅₀ is the concentration of test substance in dilution water that is calculated to affect 50% of a test population during continuous exposure over a specified period of time.

each treatment will be made on a separate test chamber that is set up identically to the other replicates within the treatment group, including the addition of test organisms.

5 DOCUMENTATION, RECORD KEEPING, AND REPORTING REQUIREMENTS

This section describes field and laboratory documentation and record keeping, data validation, and data report requirements.

5.1 Documentation and Records

This project will require central project files to be maintained at Anchor QEA. Project records will be stored and maintained in a secure manner. Each project team member is responsible for filing all necessary project information or providing it to the person responsible for the filing system. Individual team members may maintain files for individual tasks, but must provide such files to the central project files upon completion of each task. A project-specific index of file contents is to be kept with the project files. Hard copy documents, when necessary, will be kept on file at Anchor QEA throughout the duration of the project, and all electronic data will be maintained in the database at Anchor QEA.

5.1.1 Field Records

All documents generated during the field effort are controlled documents that become part of the project file.

5.1.1.1 Field Logs

Field team members will keep a daily record of significant events, observations, and measurements in a field log. All field activities will be recorded in a bound, paginated field logbook maintained by the FC or a designee for each activity. Field logbooks will be the main source of field documentation for all field activities. The on-site field representative will record information pertinent to the investigation program in the field logbook. The sampling documentation may be recorded manually or electronically and will contain information on each sample collected including, at a minimum, the following information:

- Project name
- Field personnel on site
- Site visitors
- Weather conditions
- Field observations

- Maps and/or drawings
- Date and time sample collected
- Sampling method and description of activities
- Identification or serial numbers of instruments or equipment used
- Deviations from the QAPP and SAP
- Conferences associated with field sampling activities

The person recording information must enter the date and time and initial each entry. Additional specific field reporting requirements are defined in the SAP. In general, sufficient information will be recorded during sample collection so that reconstruction of the event can occur without relying on the memory of the field personnel.

The field logbooks will be permanently bound and durable for adverse field conditions. All pages will be numbered consecutively. Notes will be taken in indelible, waterproof blue or black ink. Errors will be corrected by crossing out with a single line, dating, and initialing.

5.1.2 Analytical and Chemistry Records

Analytical data records will be retained by the laboratory and in the Anchor QEA central project files. For all analyses, the data reporting requirements will include those items necessary to complete data validation, including electronic copies of all raw data. The analytical laboratory will be required, where applicable, to report the following:

- **Project Narrative.** This summary, in the form of a cover letter, will discuss problems, if any, encountered during any aspect of analysis. This summary should discuss, but is not limited to, QC, sample shipment, sample storage, and analytical difficulties. Any problems encountered, actual or perceived, and their resolutions will be documented in as much detail as appropriate.
- **COC Records.** Legible copies of the COC forms will be provided as part of the data package. This documentation will include the time of receipt and condition of each sample received by the laboratory. Additional internal tracking of sample custody by the laboratory will also be documented on a sample receipt form. The form must include all sample shipping container temperatures measured at the time of sample receipt.

- **Sample Results.** The data package will summarize the results for each sample analyzed. The summary will include the following information when applicable:
 - Field sample identification code and the corresponding laboratory identification code
 - Sample matrix
 - Date of sample extraction/preparation
 - Date and time of analysis
 - Weight and/or volume used for extraction/preparation/analysis
 - Final dilution volumes or concentration factor for the sample
 - Identification of the instrument used for analysis
 - MDLs and quantitation limits accounting for sample-specific factors (e.g., dilution, total solids)
 - Analytical results with reporting units identified
 - Data qualifiers and their definitions

- **QA/QC Summaries.** This will contain the results of the laboratory QA/QC procedures. Each QA/QC sample analysis will be documented with the same information required for the sample results (see above). No recovery or blank corrections will be made by the laboratory. The required summaries are listed below; additional information may be requested.
 - **Method Blank Results.** The method blank results associated with each sample and the concentration of all compounds of interest identified in these blanks will be reported.
 - **Matrix Spike Recovery.** All matrix spike recovery data will be included. The name and concentration of all compounds added, percent recoveries, and range of recoveries will be listed. The RPD for all matrix spike duplicate analyses will be reported.
 - **Matrix Duplicate.** The RPD for all matrix duplicate analyses will be reported.
 - **Laboratory Control Sample.** All laboratory control sample recovery data will be included. The names and concentrations of all compounds added, percent recoveries will be reported. The RPDs for all duplicate analyses will be included.

- **Internal Standard Area Summary.** The area counts of internal standard areas or their concentrations will be reported for all analyses that require internal standards.
- **Surrogate Spike Recovery.** The names and concentrations of all surrogate spike compounds added, the spiked concentrations, the percent recoveries, and the range of acceptable recoveries will be reported for organic analyses.
- **Calibration Data Summary.** This summary will report the concentrations of the initial calibration and calibration verification standards, and the date and time of analyses. The response factor, percent relative standard deviation, percent difference, and retention time for each analyte will be reported, as applicable.
- **Relative Retention Time.** The relative retention times for each analyte detected in the samples for both primary and confirmation analyses for applicable methods will be reported along with the acceptable retention time ranges.
- **Original Data.** Legible copies of the original data generated by the laboratory will include the following:
 - o Sample preparation, identification of preparation method used, and cleanup logs
 - o Instrument specifications and analysis logs for all instruments used on days of calibration and analysis
 - o Calculation worksheets for inorganic analyses
 - o Printouts of full scan chromatograms and quantitation reports for all gas chromatograph (GC) and GC/mass spectrometer (MS) sample, standard, blank, calibration, spike, replicate, and reference material results
 - o Enhanced spectra of detected compounds with associated best-match spectra for each sample for GC/MS analyses

All instrument data shall be fully restorable at the laboratory from electronic backup. Data validation reports will be maintained in the central project files with the analytical data reports.

5.1.3 Data Reduction

Data reduction is the process by which original data (analytical measurements) are converted or reduced to a specified format or unit to facilitate analysis of the data. Data reduction requires that all aspects of sample preparation that could affect the test result, such as sample volume analyzed or dilutions required, be taken into account in the final result. It is the laboratory analyst's responsibility to reduce the data, which are subjected to further review by the Laboratory Manager, the project manager, the QA/QC Manager, and independent reviewers. Data reduction may be performed manually or electronically. If performed electronically, all software used must be demonstrated to be true and free from unacceptable error.

5.2 Bioassay Data Deliverables

The laboratory conducting the bioassay tests will be responsible for internal checks on data reporting and will correct errors identified during the QA review. The bioassay laboratory for this study will be required to report results that include all information recommended by PSEP protocols for QA review, as follows:

- A description of any deviations from the methodology or problems with the process and procedures of analyses
- Test methods used for bioassay testing and statistical analyses
- Results for survival, growth, reburial, abnormalities, water quality parameters, reference toxicant, and statistical analyses
- Original data sheets for water quality, survival, growth, reburial, abnormalities, reference toxicant, and statistical analyses
- COC records

Close contact with the laboratory will be maintained to resolve any QA/QC problems in a timely manner.

5.3 Data Management

Field data sheets will be checked for completeness and accuracy by the FC prior to delivery to the data manager. All data generated in the field will be documented and provided to the office data manager, who is responsible for the data's entry into the database. All manually

entered data will be checked by a second party. Field documentation will be filed in the main project file after data entry and checking are complete.

Laboratory data will be provided to the data manager in the EQUIS electronic format. The laboratory data that are provided electronically and loaded into the database will undergo a 10% check against the laboratory hard copy data. Data will be validated or reviewed manually and qualifiers, if assigned, will be entered manually. The accuracy of all manually entered data will be verified by a second party.

6 DATA VALIDATION AND USABILITY

This section describes the processes that will be used to review project data quality.

6.1 Data Review, Validation, and Verification

Stage 2B data validations (USEPA 2009) will be performed on most data and Stage 4 data validations will be performed on the dioxin/furan data. During the validation process, analytical data will be evaluated for method QC and laboratory QC compliance, and their validity and applicability for program purposes will be determined. Based on the findings of the validation process, data validation qualifiers may be assigned. The validated project data, including qualifiers, will be entered into the project database, thus enabling this information to be retained or retrieved, as needed.

6.2 Validation and Verification Methods

Data validation includes signed entries by the field and laboratory technicians on field data forms and laboratory datasheets, respectively, review for completeness and accuracy by the FC and Laboratory Manager, review by the QA/QC Manager (or designee) for outliers and omissions, and the use of QC criteria to accept or reject specific data. All data will be entered into the project database.

All laboratory data will be reviewed and verified to determine whether DQOs have been met and that appropriate corrective actions have been taken, when necessary. The project QA/QC Manager or designee will be responsible for the final review of all data generated from analyses of samples.

The first level of review will take place in the laboratory as the data are generated. The Laboratory Manager or designee will be responsible for ensuring that the data generated meet minimum QA/QC requirements and that the instruments were operating under acceptable conditions during generation of data. DQOs will also be assessed at this point by comparing the results of QC measurements with pre-established criteria as a measure of data acceptability.

The analysts and/or laboratory department manager will prepare a preliminary QC checklist for each analytical parameter and for each sample delivery group (SDG) as soon as analysis of a SDG has been completed. Any deviations from the DQOs listed on the checklist will be brought to the attention of the Laboratory Manager to determine whether corrective action is needed, and to determine the impact on the reporting schedule.

Data packages will be checked for completeness immediately upon receipt from the laboratory to ensure that data and QA/QC information requested are present. Data quality will be assessed for all data by a reviewer using this QAPP and National Functional Guidelines (USEPA 1999, 2004, 2005, 2008), by considering the following:

- Laboratory sample receipt
- Holding times
- Instrument performance checks
- Initial calibrations
- Continuing calibrations
- Method blanks
- Surrogate recoveries
- Internal standard results
- Detection limits
- Quantitation limits
- Dual-column confirmation results
- Laboratory control samples
- Matrix spike/matrix spike duplicate samples
- Laboratory replicates
- SRMs

The data will be validated in accordance with the project-specific DQOs described above, analytical method criteria, and the laboratory's internal performance standards based on their Standard Operating Procedures.

6.3 Reconciliation with User Requirements

The QA/QC Manager will review data after each survey to determine if DQOs have been met. If data do not meet the project's specifications, the QA/QC Manager will review the errors and determine if the problem is due to calibration/maintenance, sampling techniques, or other factors and will suggest corrective action as necessary. It is expected that any problem would be able to be corrected by retraining, revision of techniques, or replacement of supplies/equipment; if not, the DQOs will be reviewed for feasibility. If specific DQOs are not achievable, the QA/QC Manager will recommend appropriate modifications.

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- USEPA, 2009. *Guidance for Labeling Externally Validated Laboratory Analytical Data for Superfund Use*. U.S. Environmental Protection Agency, Office of Solid Waste and Emergency Response. USEPA 540-R-08-005. January.

TABLES

Table F-2-1

Parameters for Analysis, Screening Criteria, Analytical Methods, and Target Quantitation Limits

Parameter	Management Standards		Model Toxics Control Act	Analytical Method	Quantitation Limit
	Sediment Cleanup Objective	Cleanup Screening Level	Method A for Unrestricted Land Uses		
Metals					
Cadmium	260	270	2000	6010B/6020	0.5
Polycyclic Aromatic Hydrocarbons, µg/kg dry weight					
Total LPAH ^a	---	---	---	8270D SIM	---
Naphthalene	---	---	---	8270D SIM	5.0
Acenaphthylene	---	---	---	8270D SIM	5.0
Acenaphthene	---	---	---	8270D SIM	5.0
Fluorene	---	---	---	8270D SIM	5.0
Phenanthrene	---	---	---	8270D SIM	5.0
Anthracene	---	---	---	8270D SIM	5.0
2-Methylnaphthalene	---	---	---	8270D SIM	5.0
Total HPAHs ^b	---	---	---	8270D SIM	---
Fluoranthene	---	---	---	8270D SIM	5.0
Pyrene	---	---	---	8270D SIM	5.0
Benzo(a)anthracene	---	---	---	8270D SIM	5.0
Chrysene	---	---	---	8270D SIM	5.0
Total benzo(b,j,k)fluoranthenes	---	---	---	8270D SIM	5.0
Benzo(a)pyrene	---	---	10	8270D SIM	5.0
Indeno(1,2,3-cd)pyrene	---	---	---	8270D SIM	5.0
Dibenz(a,h)anthracene	---	---	---	8270D SIM	5.0
Benzo(g,h,i)perylene	---	---	---	8270D SIM	5.0
Total naphthalenes ^c	---	---	5,000	8270D SIM	---
cPAH TEQ	---	---	---	8270D SIM	---
Polycyclic Aromatic Hydrocarbons, mg/kg-OC					
Total LPAH ^a	370	780	---	8270D SIM	---
Naphthalene	99	170	---	8270D SIM	Various
Acenaphthylene	66	66	---	8270D SIM	Various
Acenaphthene	16	57	---	8270D SIM	Various
Fluorene	23	79	---	8270D SIM	Various
Phenanthrene	100	480	---	8270D SIM	Various
Anthracene	220	1,200	---	8270D SIM	Various
2-Methylnaphthalene	38	64	---	8270D SIM	Various
Total HPAHs ^b	960	5,300	---	8270D SIM	---
Fluoranthene	160	1,200	---	8270D SIM	Various
Pyrene	1,000	1,400	---	8270D SIM	Various
Benzo(a)anthracene	110	270	---	8270D SIM	Various
Chrysene	110	460	---	8270D SIM	Various
Total benzo(b,j,k)fluoranthenes	230	450	---	8270D SIM	Various

Table F-2-1

Parameters for Analysis, Screening Criteria, Analytical Methods, and Target Quantitation Limits

Parameter	Management Standards		Model Toxics Control Act	Analytical Method	Quantitation Limit
	Sediment Cleanup Objective	Cleanup Screening Level	Method A for Unrestricted Land Uses		
Benzo(a)pyrene	99	210	---	8270D SIM	Various
Indeno(1,2,3-cd)pyrene	34	88	---	8270D SIM	Various
Dibenzo(a,h)anthracene	12	33	---	8270D SIM	Various
Dioxin/Furans, ng/kg dry weight					
<i>Dioxins</i>					
2,3,7,8-TCDD	---	---	---	1613B	1.0
1,2,3,7,8-PeCDD	---	---	---	1613B	5.0
1,2,3,4,7,8-HxCDD	---	---	---	1613B	5.0
1,2,3,6,7,8-HxCDD	---	---	---	1613B	5.0
1,2,3,7,8,9-HxCDD	---	---	---	1613B	5.0
1,2,3,4,6,7,8-HpCDD	---	---	---	1613B	5.0
OCDD	---	---	---	1613B	10
<i>Furans</i>					
2,3,7,8-TCDF	---	---	---	1613B	1.0
1,2,3,7,8-PeCDF	---	---	---	1613B	5.0
2,3,4,7,8,-PeCDF	---	---	---	1613B	5.0
1,2,3,4,7,8-HxCDF	---	---	---	1613B	5.0
1,2,3,6,7,8-HxCDF	---	---	---	1613B	5.0
1,2,3,7,8,9-HxCDF	---	---	---	1613B	5.0
2,3,4,6,7,8-HxCDF	---	---	---	1613B	5.0
1,2,3,4,6,7,8-HpCDF	---	---	---	1613B	5.0
1,2,3,4,7,8,9-HpCDF	---	---	---	1613B	5.0
OCDF	---	---	---	1613B	10

Notes:

Total LPAH consists of the sum of naphthalene, acenaphthylene, acenaphthene, fluorene, phenanthrene, and anthracene.

a Total HPAH consists of the sum of fluoranthene, pyrene, benz(a)anthracene, chrysene, benzo(b,j,k)fluoranthenes, benzo(a)pyrene, indeno(1,2,3,-c,d)pyrene, dibenzo(a,h)anthracene, and benzo(g,h,i)perylene.

c Total naphthalenes consists of the sum of 1-methylnaphthalene, 2-methylnaphthalene, and naphthalene.

µg/kg = micrograms per kilogram

cPAH = carcinogenic polycyclic aromatic hydrocarbon

mg/kg = mliligrams per kilogram

ng/kg = nanograms per kilogram

TEQ = Toxic Equivalents Quotient

**Table F-2-2
Data Quality Objectives**

Parameter	Precision	Accuracy	Completeness
Sediments			
Total metals	± 30% RPD	75-125% R	95%
Semi-volatile organic compounds	± 35% RPD	70-150% R	95%
Dioxin/Furans	± 35% RPD	50-150% R	95%

Notes:

R = Recovery

RPD = Relative percent difference

**Table F-2-3
Field and Laboratory QA/QC Requirements**

Analysis Type	Field Quality Assurance Samples				Laboratory Quality Control Elements								
	Rinsate Blank	Field Blank	Trip Blank	Homogenization duplicate	Initial Calibration	Ongoing Calibration	Replicates	LCS/OPR	Matrix Spikes	SRM	Matrix Spike Duplicates	Method Blanks	Surrogate Spikes
Metals	1 per equipment type	1 per equipment type	NA	1 per 20 samples collected for analyses	Daily	1 per 10 samples	1 per 20 samples or 1 per batch, whichever is more frequent	1 per 20 samples	1 per 20 samples or 1 per batch, whichever is more frequent	1 per sampling event	NA	1 per 20 samples or 1 per batch, whichever is more frequent	NA
SVOCs/PAHs	1 per equipment type	1 per equipment type	NA	1 per 20 samples collected for analyses	As needed ^a	Every 12 hours	NA	1 per 20 samples	1 per 20 samples or 1 per batch, whichever is more frequent	1 per sampling event	1 per 20 samples or 1 per batch, whichever is more frequent	1 per 20 samples or 1 per batch, whichever is more frequent	Every sample
Dioxin/Furans	1 per equipment type	1 per equipment type	NA	1 per 20 samples collected for analyses	As needed ^a	Every 12 hours	1 per 20 samples or 1 per batch, whichever is more frequent	1 per 20 samples or 1 per batch, whichever is more frequent	NA ^b	1 per sampling event	NA	1 per 20 samples or 1 per batch, whichever is more frequent	Every sample ^b

Notes:

a Initial calibrations are considered valid until the ongoing continuing calibration no longer meets method specifications. At that point, a new initial calibration is performed.

b Isotope dilution with labeled compounds required in every sample.

LCS = laboratory control sample

NA = not applicable

OPR = ongoing precision and recovery

PAH = polycyclic aromatic hydrocarbons

SVOC = semivolatile organic compounds

SRM = standard reference material