

DRAFT
Remedial Investigation Report Addendum
USG Interiors Highway 99 Site
Milton, Washington

Prepared for:
USG Corporation
550 West Adams Street
Chicago, Illinois 60661-3676

January 14, 2013



A Report Prepared For :

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Milton, Washington

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Prepared by:



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CDM Project No. 19921.77628

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Section 1

Introduction

This addendum presents the results of supplemental groundwater assessment conducted as part of the remedial investigation (RI) performed for USG Interiors (USG) at the former USG property located at 7110 Pacific Highway East in Milton, Washington. The site location is shown on **Figure 1**.

This addendum supplements the RI report dated July 11, 2012. After review of this report, the Washington Department of Ecology requested that USG perform additional groundwater assessment to further characterize the extent of arsenic exceeding the groundwater protection standard to the north, south, and east.

This addendum describes the results of this supplemental groundwater assessment but does not provide detailed descriptions of site history, regional and site surface water, geology, hydrogeology, or contaminant fate and transport. The reader should refer to the July 2012 RI for this information. All of the figures and tables are reprinted in this addendum.

1.1 Agreed Order

The RI was performed to satisfy the requirements of Agreed Order DE 84-506 (Order) between the Washington Department of the Ecology (Ecology) and USG. A final RI Work Plan dated March 5, 2010 was submitted to Ecology, which addressed comments from Ecology on CDM's draft RI Work Plan. The RI was conducted in accordance with the final Work Plan.

1.2 Site Location and Description

The USG Highway 99 site is located between Pacific Highway East and Interstate 5 in Milton, Washington. **Figure 2A** shows the entire groundwater investigation area for the RI. For clarity, the extent of the exploration points shown on **Figure 2A** is referred to as the "site" throughout this report. The majority of RI fieldwork occurred in the core investigation area shown on **Figure 2B**, which is used to illustrate the RI results.

Freeway Trailer and Kanopy Kingdom currently operate at the site; their business locations are shown on **Figure 2B**. Chain link fence separates each business and the western property line along Pacific Highway East.

1.3 Remedial Investigation Objectives

The RI was implemented to:

- Characterize arsenic in surface soil between the paved areas and Hylebos Creek.
- Characterize the extent of arsenic contamination in soil, groundwater, sediment, and surface water.
- Characterize the potential contaminant migration pathway of arsenic in soil and groundwater to Hylebos Creek.

- Gather additional environmental data affecting arsenic fate and transport to help select a cleanup action that will meet MTCA requirements.
- Evaluate exposure to terrestrial and ecological receptors.

Section 2

Field Investigation

This section describes the field work and investigation methods completed during this supplemental groundwater assessment. Field work included: locating underground utilities, drilling two new groundwater monitoring wells, and collecting groundwater samples from four groundwater monitoring wells.

The supplemental groundwater assessment was completed between November 20 and November 28, 2012. The purpose of the supplemental assessment was to define the limits of groundwater exceeding the groundwater protection standard to the north (MW-15), south (MW-16), and east (PD-209A and PD-211) of the core investigation area shown on **Figure 2B**. These groundwater monitoring wells are shown on **Figure 2A**. MW-15 and MW-16 are new monitoring wells installed for this assessment. PD-209A and PD-211 are existing wells installed as part of the B&L Landfill groundwater monitoring well network. Well logs for MW-15, MW-16, and PD-211 are provided in **Appendix A**. We were unable to locate a well log for PD-209A.

ESN Northwest drilled MW-15 and MW-16 using a DPT drill rig on November 20, 2012. The wells were constructed with a 1" milled slot PVC well screen. A filter pack consisting of #10-20 Colorado Silica Sand was placed in the annular space between the well screen and the borehole walls. The monitoring wells were completed with flush-mounted protective covers. **Table 1** provides well construction details.

MW-15 and MW-16 were developed and sampled on November 27, 2012. The wells were developed by pumping with a peristaltic pump until the turbidity was reduced. MW-15 pumped dry and the groundwater sample was collected on November 28 after the water level had recovered. Groundwater samples from PD-209A and PD-211 were collected on November 27. Groundwater purging and sampling procedures were consistent with those described in the July, 2012 RI report.

Section 3

Site Geologic and Hydrogeologic Findings

This supplemental groundwater assessment yielded no new site geologic or hydrogeologic findings, a complete discussion of these topics is provided in the July 2012 RI report. Geologic cross sections and the water table surface map from the RI report are reproduced here as **Figures 3, 4, and 5**. **Table 2** provides water level measurements. **Table 3** groundwater parameters measurements from this supplemental groundwater assessment. **Tables 4 and 5** re-print surface water and hydrogeologic data from the RI report.

Section 4

Analytical Results

This section presents new groundwater data from the samples collected in November 2012.

4.1 Soil Results

No soil samples were submitted for laboratory or grain-size analysis as a part of the November 2012 supplemental assessment. For completeness, the following results are re-printed from the July 2012 RI report:

- Arsenic soil results are shown in **Table 6**.
- Isocontour maps of arsenic in site soil (**Figures 6 through 13**) were prepared using computer software and kriging methods. **Figures 6 through 13** show arsenic contours in soil at depths of 0 to 2, 4 to 6, 6 to 8, 8 to 10, 10 to 12, 12 to 14, 14 to 16, and 16 to 18 feet bgs, respectively. Note that the arsenic values shown in **Figure 13** are from saturated soil samples collected below the water table.

4.2 Groundwater Results

Groundwater samples collected in the November 2012 supplemental assessment were analyzed for total dissolved arsenic. The results are summarized in **Table 7**, along with analytical methods, reporting limits, and cleanup levels for arsenic. A Copy of the laboratory report for the supplemental groundwater assessment is included in **Appendix B**.

4.2.1 Arsenic Distribution and Geochemical Indicator Parameters

Figure 14A shows total dissolved arsenic concentration outside the core investigation area, including the results of samples collected in November 2012. **Figure 14B** is an isoconcentration map that shows the distribution of total dissolved arsenic in groundwater in the core investigation area. **Figures 15 through 19** are isoconcentration maps showing dissolved iron, arsenic (+3), arsenic (+5), and ORP in groundwater.

4.2.2 Analysis of Supplemental Groundwater Assessment Data

This section discusses arsenic results for the supplemental groundwater assessment. The July 2012 RI report analyses groundwater data from the core investigation area.

The objective of the supplemental groundwater assessment was to define the extent of arsenic exceeding the groundwater protection standard to the north, south, and east.

- South: The groundwater cleanup standard to the south was achieved with the sample collected from MW-15.
- North: The groundwater cleanup standard was not achieved in MW-16, the northernmost well drilled for the Highway 99 RI. The dissolved arsenic concentration in this well was 7.2 µg/L. Arsenic concentrations continued to attenuate to the north and these data do not indicate there is an additional arsenic source at the northern end of the site.

- East: The groundwater cleanup standard was exceeded in both of the B&L Landfill wells sampled for this supplemental assessment. Dissolved arsenic concentrations in these wells were 5.1 µg/L for PD-211 and 8.5 µg/L for PD-209A.

Arsenic is ubiquitous throughout Commencement Bay and the surrounding area as a result of the operation of a former Asarco smelter in Ruston. Arsenic sources in soil include fallout from the smelter plume, smelter slag from used as ballast in the many log yards, and smelter slag that was widely used as a fill material. Slag fill was observed in several soil samples collected for this RI.

This area-wide source of soil contamination impacts groundwater quality. CDM Smith recently submitted to Ecology a study of arsenic concentrations in soil and groundwater in the vicinity of the Estes Express Lines Terminal Facility (aka USF Reddaway) in Tacoma (CDM Smith, 2012). In our view, arsenic concentrations in the range of 5.1 µg/L to 8.5 µg/L that are seen in monitoring wells MW-16, PD-209A and PD-211 are within the range of area-wide background concentrations and are not necessarily indicative of impact from the Highway 99 site.

4.3 Surface Water Results

No surface water samples were collected for this supplemental assessment. RI surface water results are re-printed in **Table 8**.

4.4 Sediment Results

No sediment samples were collected for this supplemental assessment. RI sediment results are presented in **Table 9**.

Section 5

Evaluation of Quality Control Data

Analytical reports and all available QC data were reviewed and evaluated to assess their overall quality and usability for the supplemental groundwater assessment samples. Based on these evaluations, no QC issues encountered were significant enough to warrant analytical data qualification. All data were determined to be usable for the intended project purposes.

Section 6

Site Conceptual Model

Arsenic geochemistry, fate and transport, and attenuation are discussed in the July 2012 RI report.

Section 7

Terrestrial Ecological Evaluation

A simplified terrestrial ecological evaluation (TEE) was conducted to assess the potential risk of exposure to wildlife from potential site contamination. The TEE is presented in the July 2012 RI report.

Section 8

Summary

Findings of the RI are summarized below.

- Based on our evaluation of the overall quality and usability of soil and groundwater samples, no QC issues encountered were significant enough to warrant analytical data of analytical reports and available QC data from the field investigation. All data were determined to be usable for the intended project purposes without qualification.
- Industrial waste containing arsenic was used as fill on the site from about 1971 to 1973. The majority of this fill was excavated and disposed off-site by USG in a 1984/1985 contaminant source removal action. Arsenic impacted native soil in the vicinity of 99-1 was also removed at this time.
- The site is underlain by fill, alluvium, and glacial deposits to a depth of at least 59 feet bgs. Fill included slag.
- Two aquifers were identified at the site: the Alluvial Aquifer and Glacial Aquifer.
- The Alluvial Aquifer is the uppermost aquifer at the site and is impacted by arsenic. There is a strong upward hydraulic gradient from the underlying Glacial Aquifer.
- The estimated average linear groundwater flow velocity in the Alluvial Aquifer is estimated to range from 2 to 20 feet/day.
- The distribution of residual arsenic in soil at the site reflects the results of the 1984/1985 contaminant source removal action. Arsenic concentrations are relatively low at ground surface. Soil excavated in 1984/1985 was restored with clean fill. The RI fully defined the lateral and vertical extent of arsenic exceeding MTCA soil cleanup levels.
- Arsenic concentrations in Alluvial Aquifer groundwater are highest at monitoring well 99-1. This well was drilled where the highest arsenic concentrations were encountered in fill and native soil during the 1984/1985 contaminant source removal action.
- Arsenic concentrations in groundwater attenuate significantly in all directions from 99-1. However, arsenic exceeds MTCA Method A groundwater cleanup levels to the north (Linwood Custom Homes) and east of Interstate 5. In our view, arsenic concentrations between 5.1 µg/L to 8.5 µg/L are within the range of area-wide background concentrations and are not necessarily indicative of impact from the Highway 99 site.
- Arsenic within the Alluvial Aquifer attenuates with depth. Arsenic in the underlying Glacial Aquifer exceeds MTCA Method A cleanup standards but this exceedence does not appear to be related site activities.

- Arsenic transport in the Alluvial Aquifer is at least 34 times slower than the groundwater velocity, resulting in long travel times for arsenic to migrate downgradient from the contaminant source area.
- Arsenic in the Alluvial Aquifer does not appear to be impacting Hylebos Creek water quality.
- Hylebos Creek sediment downgradient of the contaminant source area has arsenic exceeding ecological screening criteria
- The simplified TEE exposure analysis concluded that land use at the site and surrounding area makes substantial wildlife exposure unlikely.

Section 9

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Tables

Table 1
Well Construction Details
Highway 99 Site
 USG Interiors
 Milton, Washington

Well I.D.	Northing ^a	Easting ^a	TOC Elevation (ft AMSL) ^b	Boring Total Depth (ft)	Screen Depth Interval (ft)	Casing Diameter (in)	Slot Size (in)	Screen Type	Drilled Date
MW-1	703059.65	1184681.28	23.02	19.0	13-18	2	0.01	PVC	05/05/10
MW-2	702999.60	1184652.77	22.37	19.0	12-19	2	0.01	PVC	05/04/10
MW-3	703045.13	1184763.71	20.22	21.0	14.7-19.7	2	0.01	PVC	05/07/10
MW-4	702987.85	1184749.40	20.40	20.0	14-19	2	0.01	PVC	05/05/10
MW-5	702934.84	1184745.18	19.07	20.0	14.5-19.5	2	0.01	PVC	05/06/10
MW-6	702883.36	1184710.13	19.89	20.0	14.1-19.1	2	0.01	PVC	05/06/10
MW-7	702969.79	1184715.93	21.06	39.0	25-30	2	0.01	PVC	05/05/10
MW-8	702924.45	1184744.14	19.12	40.0	34.9-40.1	2	0.01	PVC	05/06/10
MW-9	702988.01	1184715.80	20.87	59.0	43-48	2	0.01	PVC	05/04/10
MW-10	702958.17	1184783.51	14.15	12.6	10.4-11.5	3/4	0.01	Stainless Steel	10/14/11
MW-11	703185.90	1184844.31	15.41	10.5	9.3-10.5	3/4	0.01	Stainless Steel	10/14/11
MW-12	703065.01	1184585.80	21.54	20.0	14-19	1	0.01	Pre-pack PVC	05/11/12
MW-13	702495.10	1184478.55	22.16	16.0	10-15	1	0.01	Pre-pack PVC	05/11/12
MW-14	703437.40	1184781.81	30.30	20.0	13-18	1	0.01	Pre-pack PVC	05/11/12
MW-15				12.0	7-12	1	0.01	PVC	11/20/12
MW-16				12.0	12-17	1	0.01	PVC	11/20/12
PD-209A	702899.19	1185072.73	17.13	~14	UNK	2	UNK	PVC	UNK
PD-211	703281	1185150	16.77	20.0	6-16	2	UNK	PVC	08/18/08
99-1	702978.95	1184715.54	21.34	28.0	15-25	4	0.01	PVC	05/1985
99-2	703159.55	1184771.51	22.64	25.5	15-25	4	0.01	PVC	05/1985

Notes:

- a) Washington State Plane North American Datum of 1983 (NAD 83), Zone 12, feet.
 - b) ft AMSL - feet above mean sea level. Elevations based on North American Vertical Datum of 1988 (NAVD 88).
- TOC - Top of casing.
 PVC - Polyvinylchloride.
 UNK - Unknown.



Table 3
Groundwater General Parameters

Hwy 99 Site
USG Interiors
Milton, Washington

Monitoring Well	Date Sampled	Time Sampled	Temperature (°C)	Specific Conductance (µs/cm)	pH	Turbidity (NTU)	Dissolved Oxygen (mg/L)	ORP (mV)	Appearance/ Odor
MW1	05/26/10	1435	12.72	318	6.73	5.79	0.25	-11.7	Clear, colorless/no odor
MW2	05/25/10	1445	13.28	331	6.79	0.57	0.22	-35.4	Clear, colorless/no odor
MW3	05/25/10	1615	12.53	449	6.73	16.6	0.20	-82.8	Yellow tint, slight turbidity/no odor
	07/15/10	1430	13.01	460	6.66	3.3	0.13	-107.4	Slight yellowish color, clear, no odor
MW4	05/26/10	1310	12.22	633	6.48	5.68	0.26	-0.7	Clear, colorless/no odor
	07/15/10	1305	13.51	664	6.61	0.00	0.15	-91.5	Clear, colorless, broken organic sheen /no odor
MW5	05/26/10	1025	11.79	394	6.74	4.58	0.30	-67.1	Clear, colorless/no odor
MW6	05/26/10	0915	12.66	456	6.68	8.96	0.39	-54.5	Clear, colorless/no odor
MW7	05/27/10	1045	13.28	420	6.99	10.15	0.21	-8.3	Clear, colorless/no odor
MW8	05/27/10	0940	12.05	419	7.00	8.62	0.27	16.3	Clear, colorless/no odor
MW9	05/27/10	1200	13.35	265	7.72	9.86	0.19	68.2	Clear, colorless/no odor
MW10	10/18/11	1335	13.44	349	6.88	49.8	0.47	-94.0	Clear, colorless/no odor
MW11	10/18/11	1225	13.90	670	6.48	12.8	0.16	-129.9	Clear, colorless/no odor
MW12	05/22/12	0950	11.91	188	6.67	26.9	2.00	-75	Clear, colorless, odorless, slight turbidity observable in bucket
MW13	05/22/12	1220	13.24	1024	6.56	84	0.98	-102.1	Clear, colorless, odorless, little bit swirled organic sheen
MW14	05/22/12	1440	12.21	1249	6.54	863	0.71	-101.1	Colorless, odorless, water in bucket is slightly muddy
MW-15	11/27/12	1400	13.10	363	7.40	>1000	8.18	-38.3	Colorless/no odor/turbid
MW-16	11/28/12	1530	12.58	669	7.06	449	1.30	-76.3	Colorless/no odor/turbid
PD-209A	11/27/12	1205	11.47	591	7.01	24.0	1.14	-91.9	Colorless/clear/no odor/small amount biomass
PD-211	11/27/12	1045	10.84	492	6.64	34.0	1.86	-92.8	Clear, colorless/no odor/small amount light-colored biomass
99-1	05/26/10	1200	12.90	415	6.92	5.62	0.32	-58.8	Clear, colorless/no odor
	07/15/10	1210	14.21	406	6.68	5.00	0.22	-144.6	Clear, slight yellowish color, odorless
99-2	05/27/10	1310	13.24	1201	6.52	17.6	0.29	-31	Clear, slight yellowish color, broken organic sheen /no odor

Notes:

- °C - degrees Celsius.
- µs/cm - microsiemens per centimeter.
- mg/L - milligram per liter.
- mV - millivolts.
- NTU - nephelometric turbidity units.



Table 8
Analytical Results - Groundwater
Highway 99 Site

USG Interiors
Milton, Washington

Analyte	Sample I.D. and Sample Date					
	USGHWY99-MW1-05/10	USGHWY99-MW2-05/10	USGHWY99-MW3-05/10	USGHWY99-MW4-05/10	USGHWY99-MW0-05/10*	USGHWY99-MW5-05/10
	05/25/10	05/25/10	05/25/10	05/26/10	05/26/10	05/26/10
Dissolved Metals (µg/L)						
EPA Methods 200.8/7060A/6010B						
Arsenic (7060A)	630	34	780 **	1,030 **	1,060 **	1,090
Iron	4,290	1,560	29,900 **	31,500 **	32,000 **	5,070
Total Metals (µg/L)						
EPA Method 200.8/7090A/6010B						
Arsenic (200.8)	--	64.2	--	--	--	--
Arsenic (7060A)	--	79	--	--	--	--
Calcium	27,100	21,200	30,200	45,300	43,500	26,900
Iron	6,660	2,970	22,100	9,980	9,670	11,800
Magnesium	14,600	13,700	16,300	25,300	24,000	17,300
Potassium	2,830	3,120	4,910	6,240	5,840	3,860
Sodium	10,500	11,800	15,700	21,700	20,500	15,500
Arsenic Speciation (µg/L)						
Arsenic (III)	455	45.9	267	1,350	1,260	1,410
Arsenic (V)	33.5	2.27	19.2	29.8	24.9	36.6
Conventionals						
Alkalinity (SM 2320; mg/L CaCO ₃)	152	142	175	264	269	178
Carbonate (SM 2320; mg/L CaCO ₃)	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
Bicarbonate (SM 2320; mg/L CaCO ₃)	152	142	175	264	269	178
Hydroxide (SM 2320; mg/L CaCO ₃)	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
Total Dissolved Solids (EPA 260.1; mg/L)	--	--	--	--	--	--
Total Suspended Solids (EPA 160.2; mg/L)	2.7	5.7	24.4	11.6	10.3	28.5
Chloride (EPA 300.0; mg/L)	4.4	6.7	5.2	9.6	10.0	7.6
N-Nitrate (EPA 300.0; mg-N/L)	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
N-Nitrite (EPA 300.0; mg-N/L)	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
Sulfate (EPA 300.0; mg/L)	2.8	6.5	14.7	2.5	2.6	<0.1
Chemical Oxygen Demand (EPA 410.4; mg/L)	28.7	9.34	55.4	30.3	29.4	11.2
Total Organic Carbon (EPA 415.1; mg/L)	12.4	2.71	19.9	11.1	11.2	5.05



Table 8
Analytical Results - Groundwater
Highway 99 Site

USG Interiors
Milton, Washington

Analyte	Sample I.D. and Sample Date					
	USGHWY99-MW6-05/10	USGHWY99-MW7-05/10	USGHWY99-MW8-05/10	USGHWY99-MW9-05/10	USGHWY99-99-1-05/10	USGHWY99-99-2-05/10
	05/26/10	05/27/10	05/27/10	05/27/10	05/26/10	05/27/10
Dissolved Metals (µg/L)						
EPA Methods 200.8/7060A/6010B						
Arsenic (7060A)	310	10	13	44	2,490 **	410
Iron	6,200	1,800	980	<50	6,340 **	45,700
Total Metals (µg/L)						
EPA Method 200.8/7090A/6010B						
Arsenic (200.8)	--	--	14	--	2,220	--
Arsenic (7060A)	--	--	15	--	2,430	--
Calcium	35,300	17,600	21,400	11,000	35,600	86,900
Iron	14,400	7,400	4,870	290	4,840	57,200
Magnesium	20,200	14,400	12,900	8,230	16,900	53,900
Potassium	3,490	6,000	7,640	6,590	4,290	7,510
Sodium	14,300	36,400	35,300	28,500	17,900	31,700
Arsenic Speciation (µg/L)						
Arsenic (III)	351	--	--	--	1,780	310
Arsenic (V)	16.5	--	--	--	132	37.7
Conventionals						
Alkalinity (SM 2320; mg/L CaCO ₃)	207	196	205	118	193	561
Carbonate (SM 2320; mg/L CaCO ₃)	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
Bicarbonate (SM 2320; mg/L CaCO ₃)	207	196	205	118	193	561
Hydroxide (SM 2320; mg/L CaCO ₃)	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
Total Dissolved Solids (EPA 260.1; mg/L)						
Total Suspended Solids (EPA 160.2; mg/L)	41.5	22.2	18.1	4.3	9.9	50
Chloride (EPA 300.0; mg/L)	7.3	5.6	6.3	5.4	7.4	9.6
N-Nitrate (EPA 300.0; mg-N/L)	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
N-Nitrite (EPA 300.0; mg-N/L)	<0.1	<0.1	<0.1	<0.1	<0.1	<0.5
Sulfate (EPA 300.0; mg/L)	<0.1	<0.1	0.2	7.5	1.6	<0.1
Chemical Oxygen Demand (EPA 410.4; mg/L)	20.5	10.9	7.75	6.48	7.43	62.7
Total Organic Carbon (EPA 415.1; mg/L)	9.27	4.17	3.83	<1.50	4.83	25.3



Table 8
Analytical Results - Groundwater
Highway 99 Site

USG Interiors
Milton, Washington

Analyte	Sample I.D. and Sample Date													
	GW-1	GW-2	GW-3	GW-4	GW-5	GW-6	GW-7	GW-8	GW-9	MW10-10/11	MW11-10/11	MW12-05/12	MW13-05/12	MW14-05/12
	04/07/11	04/07/11	04/07/11	04/07/11	04/07/11	04/07/11	04/07/11	04/07/11	04/07/11	10/18/11	10/18/11	05/22/12	05/22/12	05/22/12
Dissolved Metals (µg/L)														
<u>EPA Method 6020</u>														
Arsenic	55	2.4	38	120	21	19	<2	340	2.1	366	23.5	2.1	14.3	10.3
Iron	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Total Metals (µg/L)														
<u>EPA Method 200.8/7090A/6010B</u>														
Arsenic (200.8)	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Arsenic (7060A)	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Calcium	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Iron	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Magnesium	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Potassium	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Sodium	--	--	--	--	--	--	--	--	--	--	--	--	--	--
<u>Arsenic Speciation (µg/L)</u>														
Arsenic (III)	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Arsenic (V)	--	--	--	--	--	--	--	--	--	--	--	--	--	--
<u>Conventionals</u>														
Alkalinity (SM 2320; mg/L CaCO ₃)	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Carbonate (SM 2320; mg/L CaCO ₃)	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Bicarbonate (SM 2320; mg/L CaCO ₃)	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Hydroxide (SM 2320; mg/L CaCO ₃)	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Total Dissolved Solids (EPA 260.1; mg/L)	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Total Suspended Solids (EPA 160.2; mg/L)	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Chloride (EPA 300.0; mg/L)	--	--	--	--	--	--	--	--	--	--	--	--	--	--
N-Nitrate (EPA 300.0; mg-N/L)	--	--	--	--	--	--	--	--	--	--	--	--	--	--
N-Nitrite (EPA 300.0; mg-N/L)	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Sulfate (EPA 300.0; mg/L)	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Chemical Oxygen Demand (EPA 410.4; mg/L)	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Total Organic Carbon (EPA 415.1; mg/L)	--	--	--	--	--	--	--	--	--	--	--	--	--	--



Table 8
Analytical Results - Groundwater
Highway 99 Site

USG Interiors
Milton, Washington

Analyte	Sample I.D. and Sample Date				
	MW-15	MW-16	PD-209A	PD-211	PD-311***
	11/27/12	11/28/12	11/27/12	11/27/12	11/27/12
Dissolved Metals (µg/L)					
<u>EPA Method 6020</u>					
Arsenic	0.8	7.2	8.5	5.1	4.6
Iron	--	--	--	--	--
Total Metals (µg/L)					
<u>EPA Method 200.8/7090A/6010B</u>					
Arsenic (200.8)	--	--	--	--	--
Arsenic (7060A)	--	--	--	--	--
Calcium	--	--	--	--	--
Iron	--	--	--	--	--
Magnesium	--	--	--	--	--
Potassium	--	--	--	--	--
Sodium	--	--	--	--	--
<u>Arsenic Speciation (µg/L)</u>					
Arsenic (III)	--	--	--	--	--
Arsenic (V)	--	--	--	--	--
<u>Conventionals</u>					
Alkalinity (SM 2320; mg/L CaCO ₃)	--	--	--	--	--
Carbonate (SM 2320; mg/L CaCO ₃)	--	--	--	--	--
Bicarbonate (SM 2320; mg/L CaCO ₃)	--	--	--	--	--
Hydroxide (SM 2320; mg/L CaCO ₃)	--	--	--	--	--
Total Dissolved Solids (EPA 260.1; mg/L)	--	--	--	--	--
Total Suspended Solids (EPA 160.2; mg/L)	--	--	--	--	--
Chloride (EPA 300.0; mg/L)	--	--	--	--	--
N-Nitrate (EPA 300.0; mg-N/L)	--	--	--	--	--
N-Nitrite (EPA 300.0; mg-N/L)	--	--	--	--	--
Sulfate (EPA 300.0; mg/L)	--	--	--	--	--
Chemical Oxygen Demand (EPA 410.4; mg/L)	--	--	--	--	--
Total Organic Carbon (EPA 415.1; mg/L)	--	--	--	--	--

Notes:

*USGHWY-MW0-05/10 is a duplicate of USGHWY-MW4-05/10.

** Value from re-sampling on 7/15/10.

*** PD-311 is a duplicate of PD-211.

mg/L - milligrams per liter.

µg/L - micrograms per liter.

-- not analyzed.

< - analyte not detected at or greater than the listed concentration.



Figures

P:\19921\77628\Hylebos Creek\EXPANDED SITE\FIGURE-2A-SCALE 120 01/08/13 12:43 riehlepij XREFS: SITEBASE-EXPANDED, HC-SITEBASE, S_1117
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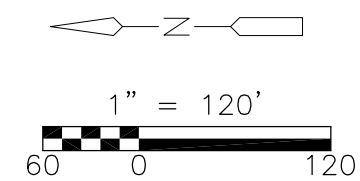
REFERENCE: GOOGLE EARTH PRO, 2012, IMAGE DATE AUGUST 20, 2011

LEGEND:

- MW-12 ⊕ MONITORING WELL
- GW-3 ● PHASE 2 DPT BORING

NOTE:

MONITORING WELL MW-14 WAS DRILLED AT THE LOCATION OF GW-6



USG INTERIORS
 HIGHWAY 99 SITE
 MILTON, WASHINGTON

Figure No. 2A
 Site Plan

P:\19921\77628\Hylebos Creek\EXPANDED SITE\FIGURE-14A-SCALE 120 01/11/13 10:16 riehlepj XREFS: SITEBASE-EXPANDED, HC-SITEBASE, S_1117
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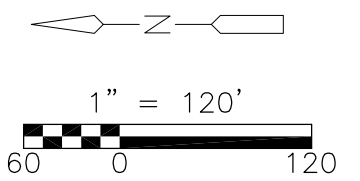
REFERENCE: GOOGLE EARTH PRO, 2012, IMAGE DATE AUGUST 20, 2011

LEGEND:

- MW-12** ⊕ 2.1 MONITORING WELL AND DISSOLVED TOTAL ARSENIC CONCENTRATION (ug/L)
- GW-1** ● 55 PHASE 2 DPT BORING AND DISSOLVED TOTAL ARSENIC CONCENTRATION (ug/L)

NOTE:

MONITORING WELL MW-14 WAS DRILLED AT THE LOCATION OF GW-6

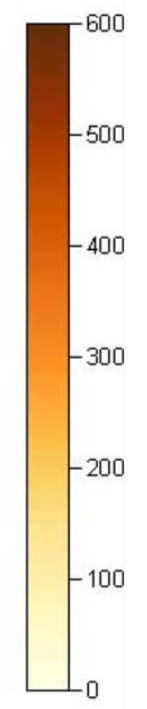
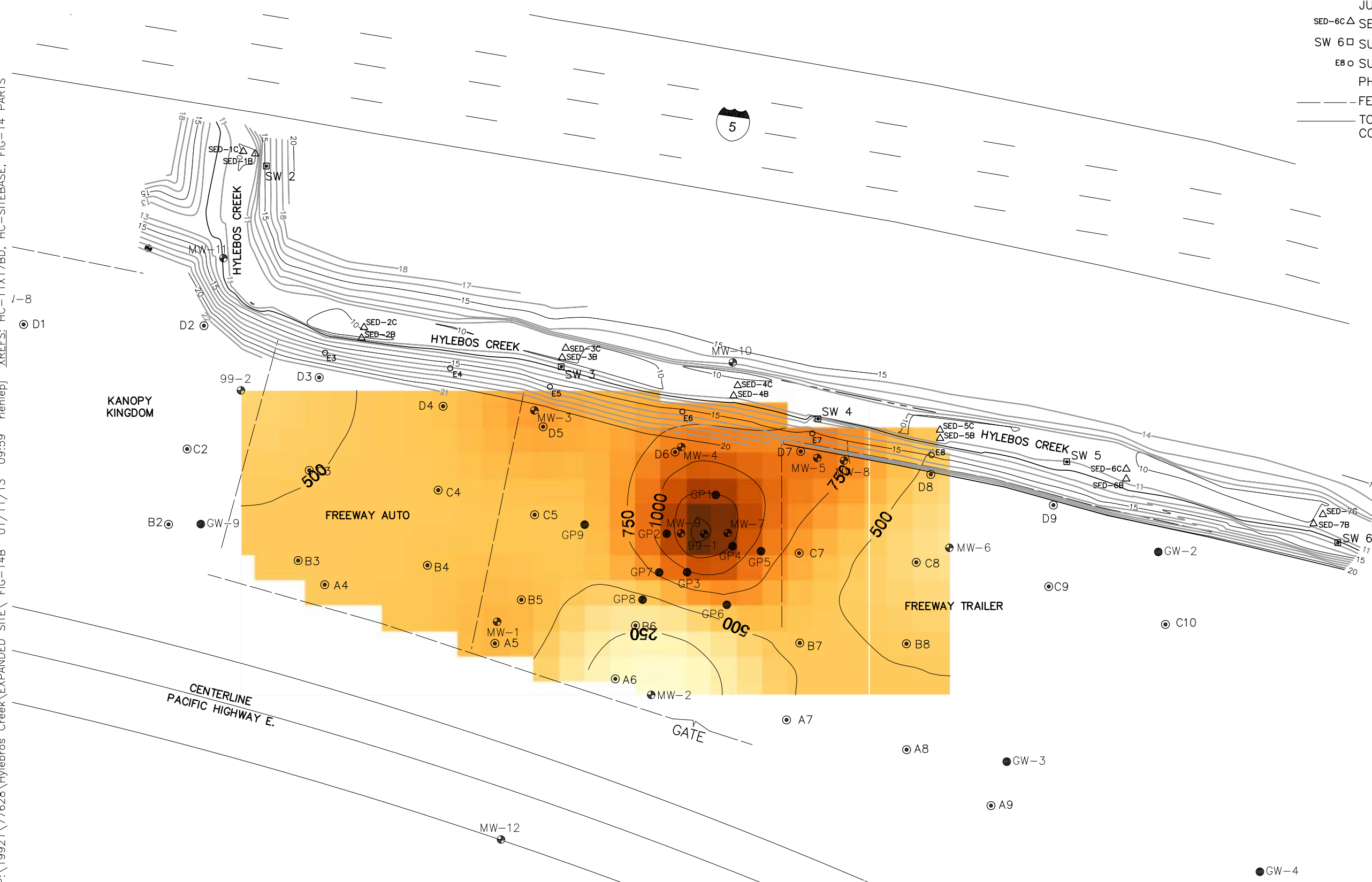


USG INTERIORS
 HIGHWAY 99 SITE
 MILTON, WASHINGTON

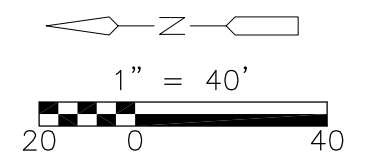
Figure No. 14A
 Dissolved Total Arsenic in Groundwater

P:\19921\77628\Hylebos Creek\EXPANDED SITE\ FIG-14B 01/11/13 09:59 riehep\ XREES: HC-11X17BD, HC-SITEBASE, FIG-14 PARTS

- LEGEND**
- MW-7 ● MONITORING WELL LOCATION
 - A9 ● SOIL BORING LOCATION
 - GP6 ● PHASE 1 DPT BORING JUNE 2006
 - SED-6C ▲ SEDIMENT SAMPLE LOCATION
 - SW 6 □ SURFACE WATER SAMPLE
 - E8 ○ SURFACE SOIL SAMPLE LOCATION PHASE 2 DPT BORING APRIL 2011
 - FENCE
 - TOPOGRAPHIC ELEVATION CONTOUR LINE



TOTAL ARSENIC GRADIENT IN GROUNDWATER (ug/L)



USG INTERIORS/HIGHWAY 99 SITE
MILTON, WASHINGTON

Figure No. 14B
Dissolved Total Arsenic in Groundwater

Appendix A

Boring Logs and Well Construction Logs

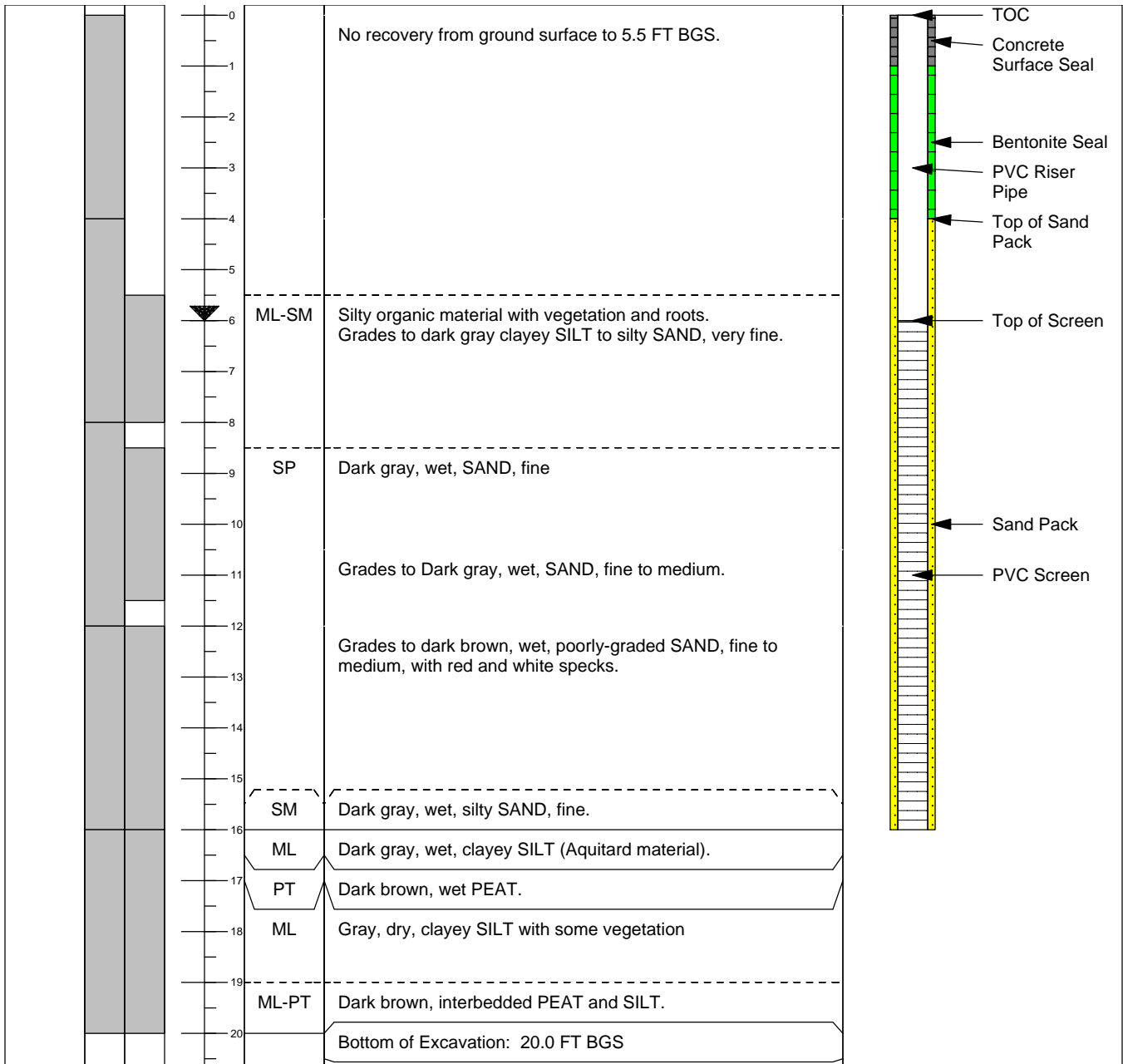
Drill Date: August 18, 2008
Logged By: Lisa Meoli
Drilled By: Cascade Drilling
Drill Type: Geoprobe/Direct Push
Sample Method: Dual Tube
Boring Diameter: 2 inches
Boring Depth (ft bgs): 20.0 FT BGS
Groundwater ATD (ft bgs): 6 FT BGS

Client: B&L Custodial Trust
Project: B&L RIM
Task Number:
Site Location: B&L Woodwaste
 Pierce County, WA

Ground Surf Elev. & Datum: 13.99 FT, NAVD 83
Coordinate System: NAD 83/98
Latitude/Northing: 703281
Longitude/Easting: 1185150
Casing Elevation: 16.77, FT NAVD 88

Remarks:

SAMPLE ID	DRIVEN / RECOVERED	DEPTH FT BGS	USCS SYMBOL	SOIL DESCRIPTION AND OBSERVATIONS	WELL COMPLETION DETAIL (If Applicable)
-----------	--------------------	--------------	-------------	-----------------------------------	--



Notes:

FT BGS = feet below ground surface
 ppm = parts per million

USCS = Unified Soil Classification System
 = denotes groundwater table

SOIL CLASSIFICATION LEGEND

MAJOR DIVISIONS			TYPICAL NAMES		SAMPLE TYPE SYMBOLS	
COARSE GRAINED SOILS More than half is larger than No. 200 sieve	GRAVELS	Clean gravels with little or no fines	GW	Well graded gravels, gravel-sand mixtures	Disturbed bag or jar sample 	
		Gravel with over 12% fines	GP	Poorly graded gravels, gravel-sand mixtures		
		SANDS	Clean sands with little or no fines	GM		Silty gravels, gravel-sand-silt mixtures
			Sands with over 12% fines	GC		Clayey gravels, gravel-sand-clay mixtures
	FINE GRAINED SOILS More than half is smaller than No. 200 sieve	SILTS AND CLAYS Liquid limit less than 50		SW		Well graded sands, gravelly sands
				SP		Poorly graded sands, gravelly sands
				SM		Silty sand, sand-silt mixtures
		SILTS AND CLAYS Liquid limit greater than 50		SC		Clayey sands, sand-clay mixtures
				ML		Inorganic silts and very fine sands, rock flour, silty or clayey fine sands, or clayey silts with slight plasticity
				CL		Inorganic clays of low to medium plasticity, gravelly clays, sandy clays, silty clays, lean clays
	OL	Organic clays and organic silty clays of low plasticity				
	MH	Inorganic silts, micaceous or diatomaceous fine sandy or silty soils, elastic silts				
	CH	Inorganic clays of high plasticity, fat clays				
	OH	Organic clays of medium to high plasticity, organic silts				
HIGHLY ORGANIC SOILS			PT	Peat and other highly organic soils	CONTACT BETWEEN UNITS	

	Change in geologic unit
	Soil type change within geologic unit
	Obscure or gradational change

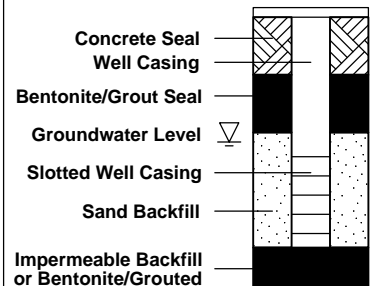
DESCRIPTORS FOR SOIL STRATA AND STRUCTURE (ENGLISH/METRIC)

General Thickness or Spacing	Parting: less than 1/16 in. (1/6 cm)	Structure	Pocket: Erratic, discontinuous deposit of limited extent	General Altitude	Near horizontal: 0 to 10 deg.
	Seam: 1/16 to 1/2 in. (1/6 to 1 1/4 cm)		Lens: Lenticular deposit		Low angle: 10 to 45 deg.
	Layer: 1/2 to 12 in. (1 1/4 to 30 1/2 cm)		Varved: Alternating seams of silt and clay		High angle: 45 to 80 deg.
	Stratum: > 12 in. (30 1/2 cm)		Laminated: Alternating seams		Near Vertical: 80 to 90 deg.
	Scattered: < 1 per ft. (30 1/2 cm)		Interbedded: Alternating layers		
	Numerous: > 1 per ft. (30 1/2 cm)				

MOISTURE DESCRIPTION

- Dry - Free of moisture, dusty
- Moist - Damp but no visible free water
- Wet - Visible free water, saturated

WELL COMPLETIONS



STRUCTURE DESCRIPTION (cont.)

Fractured	Breaks easily along definite fractured planes
Slickensided	Polished, glossy, fractured planes
Blocky, Diced	Breaks easily into small angular lumps
Sheared	Disturbed texture, mix of strengths
Homogeneous	Same color and appearance throughout

RELATIVE DENSITY OR CONSISTENCY VS. SPT N-VALUE

COARSE GRAINED			FINE GRAINED		
Density	N (blows/ft)	Approx. Relative Density (%)	Consistency	N (blows/ft)	Approx. Undrained Shear Str. (psf)
Very Loose	0 to 4	0 - 15	Very Soft	0 to 2	<250
Loose	4 to 10	15 - 35	Soft	2 to 4	250 - 500
Medium Dense	10 to 30	35 - 65	Medium Stiff	4 to 8	500 - 1000
Dense	30 to 50	65 - 85	Stiff	8 to 15	1000 - 2000
Very Dense	Over 50	85 - 100	Very Stiff	15 to 30	2000 - 4000
			Hard	over 30	>4000

PHYSICAL PROPERTY TEST

- AL - Atterberg Limits
- FC - Fines Content
- GSD - Grain Size Distribution
- MC - Moisture Content
- MD - Moisture Content/Dry Density
- Comp - Compaction Test (Proctor)
- SG - Specific Gravity
- CBR - California Bearing Ratio
- RM - Resilient Modulus
- Perm - Permeability
- TXP - Triaxial Permeability
- Cons - Consolidation
- Chem - Analytical Chemical Analysis
- Corr - Corrosion
- VS - Vane Shear
- DS - Direct Shear
- UC - Unconfined Compression
- TX - Triaxial Compression
- UU - Unconsolidated, Undrained
- CU - Consolidated, Undrained
- CD - Consolidated, Drained

Notes:

1. Sample descriptions in this report are based on visual field and laboratory observations, which include density/consistency, moisture condition, grain size, and plasticity estimates, and should not be construed to imply field or laboratory testing unless presented herein. Visual-manual classification methods in accordance with ASTM D 2488 were used as an identification guide. Where laboratory data are available, soil classifications are in general accordance with ASTM D 2487.

2. Dual symbols are used to indicate gravel and sand units with 5 to 12 percent fines.

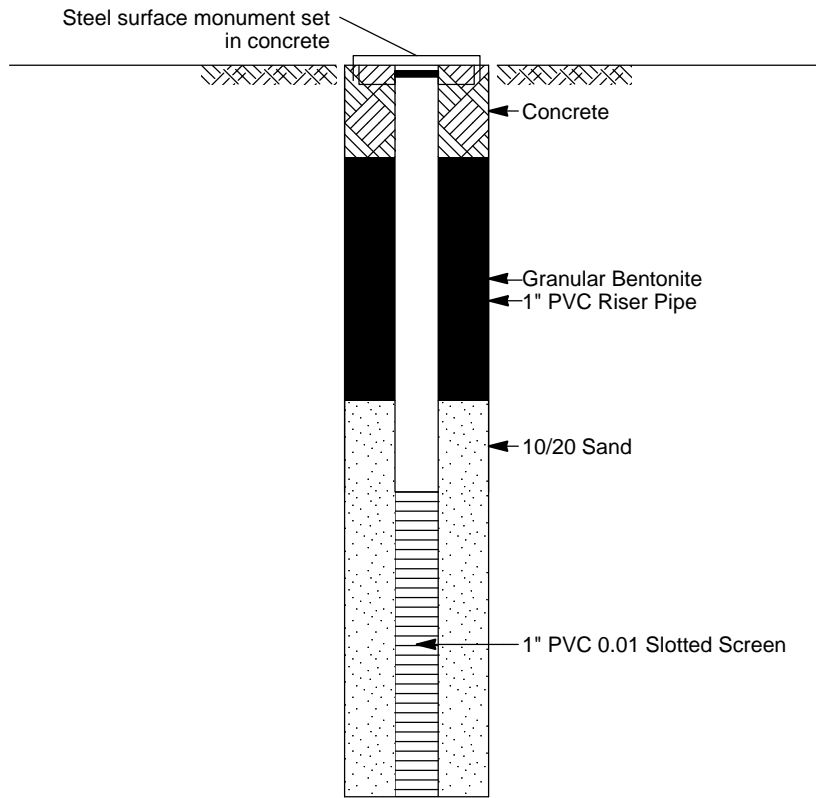
3. WOR = weight of rod.

USG Interiors Inc.
Highway 99
Milton, Washington

Project No: 19921-77628 Figure: 1



MONITORING WELL CONSTRUCTION 19921-77628-MW15-MW16-NOV 2012.GPJ CDM_BLLV.GDT 1/11/13 REV.



TYPICAL MONITORING WELL CONSTRUCTION

USG Interiors Inc.
Highway 99
Milton, Washington

Project No: 19921-77628

Figure: 2
1 of 1

LOG OF BORING WITH WELL - 19921-77628-MW15-MW16-NOV 2012.GPJ_CDM_BLLV.GDT 1/14/13 REV.

Other Tests	Sample No.	Moisture Content (%)	Dry Density (pcf)	OVM (ppm)	Penetration Resistance (blows / foot)	Depth (feet)	Sample	USCS	Symbol	DESCRIPTION	Elev. (feet)	Well or Piezometer Completion
						0				3" Asphalt.		
						2		SM		Gravelly, Silty SAND (SM), brown, fine to coarse sand, with fine to coarse gravel and silt, dense, moist (Fill).		
						4		ML		Sandy SILT (ML), light brown with fine sand and some fine gravel, stiff, wet.		
						6						
						8				Silty SAND (SM), brown, fine to coarse sand with silt and some fine to coarse gravel, dense, saturated.		
						10		SM		Increasing silt, becomes wet. Becomes saturated at 10 ft bgs. Increasing fine gravel, decreasing silt.		
						12				Boring terminated at 12 ft bgs. Groundwater encountered at 10 ft bgs.		
						14						
						16						
						18						
						20						

Location: _____	Drill Rig: <u>Track Mounted DPT</u>
Surface Elevation: _____	Equipment/Hammer: <u>2" Macrocore/NA</u>
Logged By: <u>AW</u>	Date Completed: <u>11-20-12</u>


	USG Interiors Inc. Highway 99 Milton, Washington
	Boring Log MW-15 Project No: 19921-77628

Figure: 3
1 of 1

LOG OF BORING WITH WELL 19921-77628-MW15-MW16-NOV 2012.GPJ CDM_BLLV.GDT 1/14/13 REV.

Other Tests	Sample No.	Moisture Content (%)	Dry Density (pcf)	OVM (ppm)	Penetration Resistance (blows / foot)	Depth (feet)	Sample	USCS	Symbol	DESCRIPTION	Elev. (feet)	Well or Piezometer Completion
						0				Sandy SILT (ML), light-brown, with fine sand, stiff, moist, organic material (rootlets), (Fill).		
						2		ML				
						4				Slightly Silty SAND (SP-SM), tan and olive-gray, poorly graded medium sand, note pieces of mineral wool insulation.		
						6						
						8		SP-SM		Becomes dark gray with increased mineral wool insulation, slag noted.		
						10						
						12				Becomes saturated at 12 ft bgs.		
						14		ML		Clayey SILT (ML), gray, some fine sand and fine to coarse gravel, stiff, wet, rootlets present, medium plasticity.		
						16				Becomes hard.		
						18		SM		Silty SAND (SM), gray, fine to medium sand, saturated.		
						18		ML		Sandy SILT (ML), gray, some fine sand and fine to coarse rounded gravel, stiff, wet.		
						20				Boring terminated at 10 ft bgs. Groundwater encountered at 12 ft bgs.		

Location: _____	Drill Rig: <u>Track Mounted DPT</u>
Surface Elevation: _____	Equipment/Hammer: <u>2" and 3" Macrocore/NA</u>
Logged By: <u>AW</u>	Date Completed: <u>11-20-12</u>

	USG Interiors Inc. Highway 99 Milton, Washington
	Boring Log MW-16 Project No: 19921-77628

Figure: 4
1 of 1

Appendix B

Analytical Laboratory Reports – Supplemental Groundwater Assessment