EXHIBIT A

Cleanup Action Plan



CLEANUP ACTION PLAN BLAINE MARINA INC. SITE BLAINE, WASHINGTON

Prepared by

Washington State Department of Ecology

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1 Site Cleanup Levels

LIST OF ABBREVIATIONS AND ACRONYMS

AN	Ammonium Nitrate
ARARs	Applicable or Relevant and Appropriate Requirements
AST	Aboveground Storage Tank
BGS	Below Ground Surface
BTEX	Benzene, Toluene, Ethylbenzene, and Xylenes
CAP	Cleanup Action Plan
CFR	Code of Federal Regulations
CL	Cleanup Level
CMP	Compliance Monitoring Plan
COPC	Constituent of Potential Concern
DCA	Disproportionate Cost Analysis
DCAP	Draft Cleanup Action Plan
DNR	Washington State Department of Natural Resources
Ecology	Washington State Department of Ecology
EDB	Ethylene Dibromide
EDC	1,2-Dichloroethane
IHS	Indicator Hazardous Substance
ft	Feet
ft ²	Square Feet
FS	Feasibility Study
HBU	Highest Beneficial Use
LNAPL	Light Non-Aqueous Phase Liquid
MAP	Monoammonium Phosphate
MNA	Monitored Natural Attenuation
MTBE	Methyl-Tert Butyl Ether
MTCA	Model Toxics Control Act
PCL	Preliminary Cleanup Level
Port	Port of Bellingham
PQL	Practical Quantitation Limit
RAO	Remedial Action Objective
RCRA	Resource Conservation and Recovery Act
RCW	Revised Code of Washington
RI	Remedial Investigation
RI/FS	Remedial Investigation/Feasibility Study
RME	Reasonable Maximum Exposure
Site	Blaine Marina Inc. Site
TPH-D	Diesel-Range Total Petroleum Hydrocarbons
TPH-G	Gasoline-Range Total Petroleum Hydrocarbons
TPH-O	Oil-Range Total Petroleum Hydrocarbons
VOC	Volatile Organic Compound
WAC	Washington Administrative Code
yd ³	Cubic Yard

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1.0 INTRODUCTION AND SITE BACKGROUND

This draft cleanup action plan (DCAP) describes the cleanup action selected by the Washington State Department of Ecology (Ecology) for the Blaine Marina Inc. Site (Site) in Blaine, Washington (Figure 1). The DCAP is based on a remedial investigation/feasibility study (RI/FS; Landau Associates 2015) prepared in accordance with an Agreed Order between Ecology and the Port of Bellingham (Port), as follows:

Site Name:	Blaine Marina Inc.
Site Location:	214 Sigurdson Avenue, Blaine, Washington
Facility Site Identification No.:	2888
Agreed Order No.:	DE 9000
Effective Date of Order:	May 25, 2012
Parties to the Order:	Port of Bellingham, Washington State Department of Natural Resources
Current Property Owner:	Port of Bellingham, Washington State Department of Natural Resources

1.1 SITE LOCATION AND DESCRIPTION

The Site, registered by Ecology as Facility Site ID No. 2888, is located in Blaine, Washington within Blaine Harbor. Blaine Harbor is at the north end of Drayton Harbor, in the northwest quarter of Section 1, Township 40 North, Range 1 West, Willamette Meridian. Blaine Marina Inc. leased approximately 39,000 square feet (ft²) of property at 214 Sigurdson Avenue from the Port since the 1950s, until it recently vacated the leasehold in May 2015. Blaine Marina Inc. operated a bulk fuel storage and transfer facility that resulted in the release of petroleum hydrocarbons to soil and groundwater at the Site.

The Site, as described in Agreed Order DE 9000, is defined by the extent of contamination caused by the release of hazardous substances from Blaine Marina Inc. operations, and is not limited to lease area or property area boundaries. The Site includes areas where hazardous substances have been deposited, stored, disposed of, placed, or otherwise have come to be located. The boundaries of the Site based on the RI are shown on Figure 2. With the exception of the vicinity map provided in Figure 1, the plan-view figures in this report are oriented to the northwest. Descriptions of direction in this report are in reference to *map north*, which is toward Marine Drive.

1.2 REGULATORY STATUS

The Site is being cleaned up under the authority of the Model Toxics Control Act (MTCA), Chapter 70.105D of the Revised Code of Washington (RCW), and the MTCA Cleanup Regulation, Chapter 173-340 of the Washington Administrative Code (WAC).

The RI/FS report for the Site (Landau Associates 2015) was determined to be final by Ecology in August 2015 (Ecology 2015). The RI/FS evaluated cleanup alternatives and identified a preferred cleanup alternative, which is the basis for the final cleanup action presented in this CAP. As specified in WAC 173-340-380, this CAP:

- Identifies Site cleanup standards
- Describes the selected cleanup action
- Summarizes the rationale for selecting the cleanup alternative for the Site
- Briefly summarizes other cleanup action alternatives evaluated in the RI/FS (Landau Associates 2015)
- Identifies institutional controls required as part of the cleanup action, if applicable
- Identifies applicable state and federal laws
- Provides the schedule for implementation of the cleanup action
- Specifies the types, levels, and amounts of hazardous substances remaining on Site after the cleanup action is implemented, and the measures that will be used to prevent migration of, and contact with, those substances.

1.3 SITE HISTORY AND BACKGROUND

The history of Site development and operations presented in this section is a brief summary of the historical information presented in the RI/FS report (Landau Associates 2015), based on a review of existing environmental reports related to previous Site investigations and a review of historical aerial photographs taken between 1949 and 2011.

Blaine Harbor was originally created in the late 1930s by dredging 2 acres of tideflats to create a small boat harbor. An access road was constructed across the tideflats to access the harbor, and adjacent tidelands were filled to create uplands and provide shore support for the area. In the late 1940s, 4 additional acres were dredged, additional tidelands were filled, and a breakwater, bulkheads, floats, and ramps were constructed. The upland area created at the Site generally consists of dredge fill with timber bulkheads along the shoreline. In some areas, riprap was used instead of, or in conjunction with, the bulkheads to establish the shoreline. An additional 15-acre area of tideflats was dredged and an extension of the breakwater was completed in the mid-1950s (TEC 2001). An aerial photograph from 1956 shows the breakwater was extended farther east and improvements to upland facilities including additional buildings and aboveground storage tanks (ASTs) to support the storage of fuel dispensed at the fuel dock.

Business activity has historically been focused in the area along the western end of Blaine Harbor in the industrial area, which comprises all of the upland area shown on Figure 2. A portion of the southwestern end of the harbor includes state-owned lands that are managed by the Port under a Port Management Agreement with the Washington State Department of Natural Resources (DNR). The Inner Harbor Line shown on Figure 2 defines the boundary between property owned by the Port (east of the Inner Harbor Line), and property that is owned by the state and managed by the Port under the agreement with DNR (west of the Inner Harbor Line).

Most of the infrastructure supporting the commercial activity in the industrial area is from the original construction. In 2001, the Port completed an expansion project at Blaine Harbor that included enlarging the moorage basin and the addition of more than 300 slips. The footprint of the upland industrial area has remained largely unchanged based on review of aerial photographs.

1.3.1 BLAINE MARINA INC. HISTORICAL OPERATIONS

Blaine Marina Inc. was a family-owned retail business, located in the industrial area that sold furniture, appliances, and fuel products. The company leased the property at 214 Sigurdson Avenue from the Port from the mid-1950s until it ceased operations in 2015. The furniture and appliance retailing portion of the business is presumed not to have contributed to releases observed at the Site. Blaine Marina Inc. continuously operated the tank farm at the Site to support the fuel retailing portion of its business from the mid-1950s until operations ceased in May 2015. These fueling operations resulted in the contamination of soil and groundwater at the Site. The tank farm consisted of three 8,500-gallon fuel ASTs that stored diesel and gasoline to support Blaine Marina Inc.'s onsite fueling facility. Reportedly, the ASTs were emptied when Blaine Marina Inc. ceased operations. The ASTs and associated piping remain in place.

A 4,000-gallon, horizontally oriented AST was formerly located at the tank farm. This AST stored home heating oil that was transferred to tanker trucks for offsite delivery. Because the horizontally oriented AST was supported above the ground, surface leaks would have been noticed and likely remedied quickly; it is not considered a likely source of significant contamination at the Site. This horizontally oriented AST is no longer present at the Site, although it is not clear from the review of historical documents when it was removed from service.

Fuel from the three vertically oriented 8,500-gallon ASTs was historically transferred through steel pipes buried underground from the ASTs to the fuel dock. In recent years, the use of the steel pipes was discontinued and fuel was then transferred through flexible hose from the ASTs to the dock. Underneath Sigurdson Avenue, the flexible hose is run inside of the former steel pipe fuel pipelines.

The three 8,500-gallon vertically oriented steel tanks were installed in contact with the ground surface (or more accurately, slightly below ground surface) about 60 years ago, in about 1956. Because the

facility stored more than 1,320 gallons, it was subject to the federal requirements for a spill prevention control and countermeasures plan [40 Code of Federal Regulations (CFR) Part 112]. Tank and piping integrity testing are requirements under the applicable federal regulation and Chapter 173-180 WAC. On August 16, 2010, Ecology personnel visited the Site to evaluate compliance with these requirements and determined that Blaine Marina Inc. had not conducted annual inspections or tests of the pipelines that supplied fuel to the fuel dock. Ecology issued a Notice of Violation (Docket #8900) on December 1, 2011 (Ecology 2011) and Blaine Marina Inc. subsequently completed an inspection of the pipelines. Although the pipelines passed inspection, Blaine Marina Inc. replaced the remaining metallic pipes with non-metallic hose in December 2011 (Blaine Marina Inc. 2012). Blaine Marina Inc. reported that no fuel losses were apparent based on its records of fuel purchases and sales.

1.3.2 CURRENT SITE FEATURES AND USES

Significant surface features at the Site are shown on Figure 2, which includes a dock formerly used for fueling, the Blaine Marina Inc. retail building, smaller storage buildings, and the ASTs and equipment associated with the storage and dispensing of fuel products.

A secondary containment area with concrete walls to contain accidental spills surrounds the ASTs. The secondary containment area is large enough to hold approximately 25,000 gallons of fuel, although because it has a gravel, unlined floor, it is unlikely to have effectively contained any fuel spills. Additionally, the walls of the secondary containment area are constructed of cinder blocks and only some portions of the inner surfaces of the wall have been sealed. The secondary containment may prevent a catastrophic release near the ASTs from immediately flowing over the ground surface and into the surface waters of Blaine Harbor, it is likely that if spilled fuel were not immediately removed from the secondary containment area, it would seep through the walls and/or infiltrate into the subsurface.

Four buildings are currently or were recently located at the Site, as shown on Figure 2:

- 1. The Blaine Marina Furniture and Appliance Retail building near the center of the Site covers approximately 5,400 ft² of area. The western half of the building is single-story, and the eastern half has two stories. Blaine Marina Inc. sold furniture and appliances on the ground level of the building with a public entrance on the south side of the building. This building is just south of the ASTs.
- 2. The former fuel office building was located on the west side of Sigurdson Avenue and occupied approximately 1,200 ft² on the dock adjacent to the fuel dock. The ground surface on the east side of the fuel office building (upland of the bulkhead) contained sinkholes and collapsed pavement that extended horizontally 3 to 4 feet (ft) behind (east of) the bulkhead due to a failing section of bulkhead underlying the eastern side of the building. Under the Agreed Order with Ecology, the Port implemented an interim action in 2012 to repair the failing section of bulkhead, as described in more detail in Section 1.4. The building was deconstructed down to the floor to facilitate implementation of the interim action.

- 3. An approximately 1,000-ft² storage building is located just east of the ASTs and was used by Blaine Marina Inc. for storage.
- 4. An approximately 1,350-ft² storage building is located approximately 50 ft east of the ASTs (10 ft east of the smaller storage building) and was used by Blaine Marina Inc. for storage.

1.4 INTERIM ACTION

An interim action was conducted in 2012 to repair approximately 60 linear feet of existing timber bulkhead at the Site that was progressively failing. This section of bulkhead is located along the western side of Sigurdson Avenue, and consisted of timber piling and timber lagging, with riprap placed along the toe of the structure. Most of the bulkhead in this area, including the piling and lagging, was damaged. It had shifted and bowed, and the top of the bulkhead was rotated outward toward the water. Repairing this section of bulkhead was deemed critical to preventing the release of contaminated upland soil and groundwater to marine surface water and sediment in Blaine Harbor.

The repair was conducted by installing a sheetpile bulkhead along the damaged section. The repaired section of bulkhead is noted on Figure 2 as "Sheetpile Wall." The repair will ultimately be integrated with broader bulkhead repair and replacement, which will occur during redevelopment of the Blaine Harbor Industrial Area.

1.5 ENVIRONMENTAL INVESTIGATIONS AND CONCLUSIONS

Environmental investigations at the Site were conducted as early as 1990. The Site RI/FS, conducted in 2012, investigated for the presence of the following list of constituents of potential concern (COPCs) based on preliminary information from earlier studies and historical information regarding property usage:

- Gasoline-, diesel-, and oil-range petroleum hydrocarbons (TPH-G, TPH-D, and TPH-O); benzene, toluene, ethylbenzene, and xylenes (BTEX); 1,2-dichloroethane (EDC); ethylene dibromide (EDB); methyl-tert butyl ether (MTBE); naphthalene; and lead in soil
- TPH-G, TPH-D, and TPH-O; BTEX; EDC; EDB; MTBE; naphthalene; total and dissolved lead; and dissolved manganese in groundwater
- TPH-G, TPH-D, and TPH-O; and lead in sediment
- TPH-G, TPH-D, and TPH-O; BTEX; EDC; EDB; MTBE; naphthalene; and total and dissolved lead in surface water
- BTEX; EDC; EDB; and MTBE in soil vapor.

The COPCs that were found to exceed applicable cleanup levels were carried forward in the RI/FS process as indicator hazardous substances (IHS) for the Site. The identified Site IHS and their associated media are TPH-G, TPH-D, benzene, ethylbenzene, xylenes, and total naphthalenes in soil, and TPH-G, TPH-D, benzene, and total naphthalenes in groundwater.

Volatile organic compounds (VOCs) in soil vapor were not carried forward as IHS in the RI/FS based on the low frequency of MTCA Method C soil vapor exceedances, and because the groundwater preliminary cleanup levels (PCLs) were developed to protect the soil vapor pathway. However, so that options for future use of the Site remain flexible, the highest beneficial use (HBU) for the Site is unrestricted land use. Based on this HBU, a sufficient number of soil vapor samples exceeded the MTCA Method B cleanup levels for benzene and 1,3-butadiene that these VOCs are identified as Site soil vapor IHS.

The Site boundary is shown on Figure 2, and indicates the lateral extent of the IHS as determined during the RI.

2.0 CLEANUP STANDARDS

This section develops Site cleanup standards for IHS detected in affected Site media (soil, groundwater, and soil vapor) at concentrations above screening levels during the RI/FS. Surface water and sediment are not considered media of concern because IHS were not detected at concentrations exceeding the Site screening levels in the samples collected from these media during the RI. Cleanup standards consist of: 1) numerical cleanup levels (CLs) defined by regulatory criteria that are adequately protective of human health and the environment, and 2) the points of compliance at which the CLs must be met.

2.1 NUMERICAL CLEANUP LEVELS

The following sections develop Site CLs for media of concern at the Site.

2.1.1 GROUNDWATER

Based on the potential exposure pathway receptors evaluated in the RI/FS, the HBU for groundwater is considered discharge to surface water (i.e., Blaine Harbor). Based on this HBU, the reasonable maximum exposure (RME) to Site groundwater is the more conservative of 1) uptake by aquatic organisms based on aquatic water quality criteria, 2) ingestion of affected aquatic organisms by humans, 3) uptake of affected marine sediment by benthic organisms, and 4) ingestion of affected benthic organisms by humans. As a result, federal [National Toxics Rule (40 CFR 131.36) and National Recommended Water Quality Criteria (EPA 2006)] and state (MTCA Method B formula values and Chapter 173-201A WAC) surface water criteria based on human consumption of fish, and state sediment quality standards (Chapter 173-204 WAC) were evaluated as potential CLs for Site groundwater.

Since TPH-G and TPH-D do not have surface water criteria and because available literature indicates that MTCA Method A groundwater CLs are adequately protective of aquatic organisms, MTCA Method A groundwater CLs were evaluated for these IHS. The groundwater to vapor pathway was also considered for VOCs due to the potential intrusion of soil vapor into Site buildings. The most stringent of the applicable criteria, adjusted to the practical quantitation limit (PQL) or background concentrations, if appropriate, is identified as the Site groundwater CL. Groundwater CLs for the IHS identified for the Site are provided in Table 1.

2.1.2 SOIL

Based on the potential exposure pathways established and receptors discussed in the RI/FS (Landau Associates 2015), the HBU for soil is considered "unrestricted site use." Although the Site may meet the criteria for industrial use, ongoing land use planning and future options for Site use may not be compatible

with restrictions associated with industrial cleanup standards. Based on a soil HBU of unrestricted site use, the RME for soil is the more conservative of 1) direct ingestion of soil or, 2) impacts to surface water (through the groundwater pathway) and the associated exposures described in the preceding section.

Uptake of constituents in Site soil or groundwater by terrestrial plants and animals is not considered a potential exposure pathway for Site soil. The Site qualifies for an exclusion under WAC 173-340-7491(1)(c)(i) because there is less than 1.5 acres of contiguous undeveloped land within 500 ft of the Site, so a terrestrial ecological evaluation is not required.

Based on an HBU of unrestricted Site use, MTCA Method B standard formula values for direct contact and MTCA contaminant concentrations in soil for surface water protection, calculated using the three-phase partitioning model (equation 747-1), were evaluated as potential CLs for soil. If IHS did not have an associated MTCA Method B screening value, the MTCA Method A CL for unrestricted Site use was identified as the soil CL. MTCA soil criteria for protection of surface water were not applied if the IHS was not detected in groundwater at a concentration above the groundwater CL. The most stringent of the applicable criteria, adjusted for soil background concentrations or the PQL, as appropriate, is identified as the Site soil CLs. CLs for the IHS identified in Site soil are provided in Table 1.

2.1.3 SOIL VAPOR

Similar to Site soil, the HBU for soil vapor is considered "unrestricted site use." The RME for soil vapor is direct inhalation by occupants of Site buildings.

The soil vapor CLs identified in Table 1 were calculated based on the MTCA Method B indoor air CLs and a vapor attenuation factor of 0.03, based on recent guidance from the U.S. Environmental Protection Agency (EPA; 2012) and Ecology (2016). CLs for the IHS identified in Site soil vapor are provided in Table 1.

2.2 POINTS OF COMPLIANCE

The point(s) of compliance under MTCA are the point or points at a site where the CLs must be attained to achieve cleanup standards. The points of compliance at which the CLs must be met are throughout the entire Site for soil [WAC 173-340-740(6)], groundwater [WAC -340-720(8)], and soil vapor [WAC 173-340-750(6)].

3.0 APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS

In accordance with MTCA, cleanup actions conducted under MTCA shall comply with applicable state and federal laws [WAC 173-340-710(1)]. MTCA defines applicable state and federal laws to include legally applicable requirements and those requirements that are relevant and appropriate. Collectively, these requirements are referred to as applicable or relevant and appropriate requirements (ARARs).

This section provides a brief overview of potential ARARs for the Site cleanup. The MTCA cleanup regulations (Chapter 173-340 WAC) is considered the governing regulation under which Site cleanup will be conducted, and as such is not considered an ARAR. The primary ARARs that may be applicable to the cleanup action include the following:

- Washington Chemical Contaminants and Water Quality Act and Washington Water Pollution Control Act and the following implementing regulation: Water Quality for Surface Waters (Chapter 173-201A WAC)
- Resource Conservation and Recovery Act (RCRA) and Subtitle C regulations, to the extent that any hazardous wastes are discovered during the cleanup action
- Washington Hazardous Waste Management Act and Dangerous Waste Regulations, to the extent that any dangerous wastes are discovered during the cleanup action
- Washington State Clean Water Act, with respect to water quality criteria for surface water (Blaine Harbor)
- Shoreline Management Act, with respect to construction activities during the cleanup action
- Endangered Species Act, due to the listing of Puget Sound Chinook and the potential listing of coastal/Puget Sound bull trout
- Critical Areas Ordinance of the City of Blaine (Blaine Municipal Land Use Code Chapter 17.82 Critical Areas Management)
- Northwest Clean Air Agency Regulation 300 for point source emissions.

The requirements of MTCA, the Water Quality Standards for Surface Waters, the Sediment Management Standards, and the Clean Water Act were considered in the development of cleanup standards (see Section 2.0). RCRA Subtitle C and Dangerous Waste Regulations are not expected to apply unless dangerous wastes are discovered or generated during implementation of the cleanup action; dangerous wastes are not known to be present at the Site. The Shoreline Management Act may apply during implementation of the selected cleanup action but did not directly influence the evaluation of the cleanup alternatives in the RI/FS.

In accordance with MTCA, the cleanup action will be exempt from the procedural requirements of Chapters 70.94, 70.95, 70.105, 77.55, 90.48, and 90.58 RCW, and of any laws requiring or authorizing local government permits or approvals. However, the substantive requirements of such permits or approvals (WAC 173-340-520) must be met.

4.0 CLEANUP ACTION SELECTION

Six cleanup action alternatives were evaluated in the Site FS (Landau Associates 2015). This section discusses the cleanup action alternatives evaluated in the FS and provides an overview of the selected cleanup action. The selection of the preferred remedy was based on the procedures specified by MTCA including consideration of remedial action objectives (RAOs), potentially applicable laws, meeting threshold requirements [WAC 173-340-360(2)], being permanent to the maximum extent practicable [WAC 173-340-360(3)(f)], Site restoration timeframe [173-340-360(4)(b)], consideration of public concerns [WAC 173-340-515(4)(d)], and consideration of future land use. Additional details regarding the comparative evaluation of these considerations are provided in the RI/FS report (Landau Associates 2015).

RAOs define the goals of the cleanup that must be achieved to adequately protect human health and the environment. RAOs must address all affected media, and a cleanup alternative must achieve all RAOs to be considered a viable cleanup action. RAOs can be either action-specific or media-specific.

The following action-specific and media-specific RAOs were identified for the Site:

- **RAO-1:** Remove the fuel storage and dispensing system and recoverable light non-aqueous phase liquid (LNAPL) to eliminate any ongoing sources of contamination, including demolition or removal of adjacent buildings to access LNAPL extent
- **RAO-2:** Prevent human or terrestrial ecological receptors from being exposed to hazardous substances through direct contact with contaminated media (soil and groundwater)
- **RAO-3:** Prevent hazardous substances in soil from leaching to groundwater at concentrations that exceed the groundwater CLs
- **RAO-4:** Prevent hazardous substances in soil from migrating (by erosion) to marine sediment at concentrations that exceed marine sediment CLs
- **RAO-5:** Prevent hazardous substances in groundwater from migrating to surface water and marine sediment at concentrations that exceed the groundwater PCLs
- **RAO-6:** Prevent use of shallow Site groundwater for drinking.

4.1 SUMMARY OF CLEANUP ACTION ALTERNATIVES

This section provides a summary of each alternative. Section 4.2 provides additional detail for the

selected alternative. Each alternative considered for application at the Site included the following four common elements that would be implemented regardless of the specific alternative chosen:

- Remove the AST system and adjacent buildings to ensure that the system is not an ongoing source of contamination and to provide access to the source area for implementation of the cleanup action
- Install and maintain a cover containment layer composed of pavement or permeable soil matching existing surface conditions to prevent direct contact with contamination within areas not subject to contaminated soil excavation and offsite disposal until cleanup standards are achieved

- Conduct monitoring to assess compliance with cleanup standards
- Implement institutional controls to ensure the long-term integrity of the containment system and/or prevent the use of Site groundwater as a drinking water source if soil and groundwater cleanup levels are not met throughout the Site (not applicable for Alternative 6).

The following list summarizes the primary elements of the six remedial alternatives evaluated in

the FS:

- 1. **Remedial Alternative 1:** Limited Source Removal with LNAPL Recovery and Bioremediation
 - Excavation and offsite disposal/treatment of about 1,700 tons of soil in the source area from surface to the groundwater table [an approximate depth of 10 ft below ground surface (BGS)].
 - LNAPL recovery from the open excavation using a vactor truck and/or sorbent pads.
 - Extension of the sheetpile bulkhead that was installed as an interim action to the north to reduce near-shore tidal exchange in the affected upland area and extend the residence time for the bioremediation solutions. Sheetpile joints for the new bulkhead extension would be sealed to provide a more complete hydraulic barrier.
 - Implementation of Site-wide bioremediation to achieve groundwater CLs.
 - Conducting monitored natural attenuation (MNA) once cleanup standards are achieved along the shoreline to monitor the continuing decline of contaminant concentrations until Site-wide cleanup is demonstrated.
- 2. **Remedial Alternative 2:** Source Removal and Bioremediation
 - Excavation and offsite disposal/treatment of about 3,000 tons of soil within the source area from the surface to an approximate depth of 12 ft BGS.
 - LNAPL recovery from the open excavation using a vactor truck and/or sorbent pads.
 - Extension of the sheetpile bulkhead that was installed as an interim action to the north to reduce near-shore tidal exchange in the affected upland area and extend the residence time for the bioremediation solutions. Sheetpile joints for the new bulkhead extension would be sealed to provide a more complete hydraulic barrier.
 - Implementation of Site-wide bioremediation to achieve groundwater CLs.
 - Conducting MNA once CLs are achieved along the shoreline to monitor the continuing decline of contaminant concentrations until Site-wide cleanup is demonstrated.
- 3. **Remedial Alternative 3:** Source Removal, Bioremediation and Soil Flushing with a Downgradient Hydraulic Barrier
 - Excavation and offsite disposal/treatment of the same volume of soil as for Alternative 2.
 - LNAPL recovery from the open excavation using a vactor truck and/or sorbent pads.
 - Extension of the sheetpile bulkhead that was installed as an interim action to the north and to the south to reduce near-shore tidal exchange in the affected upland area, extend the residence time for the soil flushing and bioremediation solutions, and ensure that soil flushing solutions are adequately contained. Sheetpile joints would be sealed for the entire bulkhead system to provide a more complete hydraulic barrier.

- Installation of a soil flushing system along the shoreline, upland of the sheetpile bulkhead, to enhance bioremediation. The western (downgradient) side of the interceptor trench adjacent to the existing sheetpile bulkhead would be lined with a flexible membrane and the joints of the new bulkhead sections would be sealed to provide a downgradient hydraulic barrier along the shoreline.
- Implementation of Site-wide soil flushing/bioremediation to achieve groundwater CLs.
- Conducting MNA once CLs are achieved along the shoreline to monitor the continuing decline of contaminant concentrations until Site-wide cleanup is demonstrated.
- 4. Remedial Alternative 4: Expanded Source Removal, Bioremediation Along Shoreline
 - Excavation and offsite disposal/treatment of all contaminated soil within Site boundaries east of the Sigurdson Avenue surface to an approximate depth of 12 ft BGS, totaling about 8,000 tons.
 - LNAPL recovery from the open excavation using a vactor truck and/or sorbent pads.
 - Extension of the sheetpile bulkhead that was installed as an interim action to the north to reduce near-shore tidal exchange in the affected upland area and extend the residence time for the bioremediation solutions. Sheetpile joints in the new bulkhead section would be sealed to provide a more complete hydraulic barrier.
 - Implementation of bioremediation in the area beneath Sigurdson Avenue to achieve groundwater CLs.
 - Conducting MNA once cleanup standards are achieved along the shoreline to monitor the continuing decline of contaminant concentrations until Site-wide cleanup is demonstrated.
- 5. **Remedial Alternative 5:** Expanded Source Removal, Soil Flushing with Downgradient Hydraulic Barrier
 - Excavation and offsite disposal/treatment of all contaminated soil within Site boundaries east of the Sigurdson Avenue surface to an approximate depth of 12 ft BGS, similar to Alternative 4.
 - LNAPL recovery from the open excavation using a vactor truck and/or sorbent pads.
 - Extension of the sheetpile bulkhead that was installed as an interim action to the north and to the south to reduce near-shore tidal exchange in the affected upland area, extend the residence time for the soil flushing and bioremediation solutions, and ensure that soil flushing solutions are adequately contained. Sheetpile joints would be sealed for the entire bulkhead system to provide a more complete hydraulic barrier.
 - Installation of a soil flushing system along the shoreline, upland of the sheetpile bulkhead, to enhance bioremediation. The western (downgradient) side of the interceptor trench adjacent to the existing sheetpile bulkhead would be lined with a flexible membrane and the joints of the new bulkhead sections would be sealed to provide a downgradient hydraulic barrier along the shoreline.
 - Implementation of soil flushing/bioremediation in the area beneath Sigurdson Avenue to achieve groundwater CLs.
 - Conducting MNA along the shoreline once cleanup standards are achieved to monitor the continuing decline of contaminant concentrations until Site-wide cleanup is demonstrated.
- 6. **Remedial Alternative 6:** Mass Excavation and Monitored Natural Attenuation

- Excavation and off-site disposal/treatment of all contaminated soil and LNAPL within Site boundaries, totaling about 15,000 tons.
- LNAPL recovery from the open excavation using a vactor truck and/or sorbent pads
- Extension of the sheetpile bulkhead installed as an interim action approximately 60 feet to the north to minimize marine water intrusion and provide shoreline stability during the excavation activities
- Because this alternative involves full removal of contaminated soil throughout the Site, the pavement cap and institutional controls common to Alternatives 1 through 5 are not required.

4.2 RATIONALE FOR SELECTING THE PREFERRED CLEANUP ACTION

The six cleanup alternatives listed above were developed and evaluated with respect to their ability to achieve compliance with MTCA cleanup requirements. Alternative 2 was identified as the preferred alternative in the FS and is the selected cleanup action for the Site. The rationale for the selection is summarized in this section and presented in detail in the RI/FS report (Landau Associates 2015).

The evaluation for selecting a cleanup action under MTCA requires developing a reasonable number of alternatives for cleanup, each meeting threshold criteria [WAC 173-340-360(2)(a)] including the ability to protect human health and the environment, comply with cleanup standards, comply with state and federal laws, and provide for compliance monitoring. Compliance with these requirements under MTCA is presumed by definition to be protective of human health and the environment and in compliance with applicable state and federal laws once cleanup standards have been met. The alternatives were further evaluated for their ability to satisfy these threshold criteria within a reasonable timeframe [WAC 173-340-360(2)(b)(ii) and WAC 173-340-360(4)] and achieve the RAOs identified for the Site. All six alternatives were determined to meet these requirements.

MTCA provides for the costs and benefits associated with alternatives to be evaluated through a disproportionate cost analysis (DCA), which compares the relative environmental benefits of each alternative to the most permanent alternative. Costs are disproportionate to benefits if the incremental cost of the most permanent alternative exceeds the incremental degree of benefits achieved over the lower cost alternative [WAC 173-340-360(3)(e)(i)]. Alternatives that exhibit disproportionate costs are considered "impracticable," and that alternative is eliminated from further consideration. The six evaluation criteria for the DCA are:

- Protectiveness
- Permanence
- Long-term effectiveness
- Short-term risk management
- Implementability

• Considerations of public concerns.

Based on the results of the DCA, Alternative 2 was determined to be permanent to the maximum extent practicable. The selected cleanup action complies with the provisions of WAC 173-340-360. It will be protective of human health and the environment, comply with cleanup standards and applicable state and federal laws, provide for compliance monitoring, and establish restrictive covenants if needed. Institutional controls will be implemented as needed to provide notification regarding the presence of residual contaminated soil and groundwater, regulate the disturbance/management/use of that soil/groundwater and the cleanup action components, and provide for long-term monitoring and stewardship of the cleanup action until the Site achieves soil, groundwater, and soil vapor cleanup standards. The selected cleanup action is considered to use permanent solutions to the maximum extent practicable, and will provide restoration in a reasonable timeframe. It is not anticipated that a restrictive covenant will be needed, provided soil and groundwater cleanup standards are achieved within a reasonable restoration timeframe.

4.3 DESCRIPTION OF THE SELECTED CLEANUP ACTION

The selected cleanup action (Alternative 2) consists of the following elements; subsequent sections describe how the cleanup action will be implemented to achieve cleanup standards and meet the RAOs for the Site. Figure 3 provides a conceptual summary of the primary elements of the cleanup action.

4.3.1 SITE PREPARATIONS AND SOURCE REMOVAL

The AST and fueling system will be decommissioned, demolished, and disposed of off Site to eliminate their potential to act as a future source of contamination. Buildings and slabs at the Site will be demolished and disposed of off Site or removed/relocated to provide access to the source area for excavation and removal of contaminated soil and LNAPL. Approximately 3,000 tons of heavily contaminated soil from within the lateral limits of free-phase LNAPL will be excavated and either treated or disposed of off Site. LNAPL will be recovered from the open excavation using sorbent materials or a vactor truck, as needed.

4.3.2 CONTAINMENT AND INSTITUTIONAL CONTROLS

After source removal is complete, a temporary containment system will be installed and maintained to prevent human contact with contaminated soil left in place until the Site cleanup action is complete. The temporary containment system will be a combination of soil and pavement, so that existing surface permeability characteristics are restored. In areas where pavement is removed to conduct the source removal excavation, a pavement surface will be re-installed. In limited areas of the Site where the surface is currently composed of gravel or other permeable materials, permeable soil will be used to restore the surface.

It is anticipated that the cleanup action will achieve the cleanup standards and that institutional controls will not be required following completion of the cleanup action. If the cleanup action requires more time than currently estimated, institutional controls, potentially including a restrictive covenant, will be implemented to ensure that the integrity of the capping system and other cleanup equipment is maintained to prevent contact with contaminated media, protect the integrity of the cleanup action, and prevent the use of Site groundwater as a drinking water source until the Site cleanup standards are achieved.

4.3.3 SHEETPILE BULKHEAD

The sheetpile bulkhead that was installed as an interim action will be extended to the north to reduce near-shore tidal exchange in the affected upland area and extend the residence time for the bioremediation solutions. The joints of the new sheetpile bulkhead will be sealed to provide a more complete hydraulic barrier.

4.3.4 BIOREMEDIATION AND MONITORED NATURAL ATTENUATION

A bioremediation program will be implemented after the source removal to reduce concentrations of IHS until groundwater cleanup standards are achieved. To optimize the efficacy of bioremediation in a naturally reducing environment, nitrate will be used as an electron acceptor to stimulate anaerobic degradation, and will be introduced to the subsurface by an extensive system of infiltration trenches, as shown in the conceptual layout on Figure 3. Implemented after the source removal is complete, bioremediation is anticipated to achieve cleanup standards within 4 years of the first injection. The cleanup action also includes implementing MNA after bioremediation to address any residual concentrations of petroleum hydrocarbons exceeding cleanup standards, if needed.

4.3.5 COMPLIANCE MONITORING

Compliance monitoring is a required element of any MTCA cleanup action. Compliance monitoring will be conducted in accordance with WAC 173-340-410 to confirm that cleanup standards have been achieved and to confirm the long-term effectiveness of cleanup actions at the Site. Detailed requirements will be described in a compliance monitoring plan (CMP), which will be prepared during the remedial design. The CMP will specify the location, duration, and frequency of monitoring and the rationale for the termination of monitoring.

The three types of compliance monitoring to be conducted are:

- **Protection Monitoring** to confirm that human health and the environment are adequately protected during the construction period of the cleanup action
- **Performance Monitoring** to confirm that the cleanup action has attained cleanup standards or other performance standards
- **Confirmation Monitoring** to confirm the long-term effectiveness of the cleanup action once cleanup standards and performance standards have been attained.

4.4 CLEANUP ACTION IMPLEMENTATION

This section provides a summary of the final cleanup action implementation. Specific details of the cleanup action will be provided in an Engineering Design Report.

4.4.1 SITE PREPARATIONS AND SOURCE REMOVAL

Site preparations will include decommissioning and removal of the AST and fuel dispensing system so it is not an ongoing source of contamination. Additionally, the buildings that are adjacent to the ASTs will be demolished or removed/relocated to allow access to conduct source removal. The intent of these activities is to remove the potential source of ongoing contamination and to provide access for removal of most of the existing contamination (LNAPL and heavily contaminated soil).

After removing the AST, fuel dispensing system, and adjacent structures, source removal will be conducted by excavating the heavily contaminated soil from within the approximate lateral extent of free-phase LNAPL in the source area, as shown on Figure 3. Excavation will extend from the ground surface to approximately 12 ft BGS and will total approximately 2,000 cubic yards (3,000 tons) of soil. A pre-remedial design investigation will be conducted to confirm the limits of heavily contaminated soil and LNAPL. Considering that only trace levels of contamination were encountered below 12 ft BGS, excavation to this depth will remove most of the contaminant mass from the source area. LNAPL will be recovered from the open excavation using a vactor truck and/or sorbent pads to skim LNAPL from the exposed groundwater table. Source removal is being conducted so that bioremediation can effectively address the remaining residual contamination.

4.4.2 SURFACE CONTAINMENT SYSTEM, SHEETPILE BULKHEAD, AND INSTITUTIONAL CONTROLS

After source removal activities are complete, the surface will be capped by installing asphalt pavement or permeable soil over areas of excavation and other areas of the Site, as needed. The new and existing surface will be maintained to prevent potential human exposure to contaminated soil during the timeframe that bioremediation and MNA are implemented. The extended sheetpile bulkhead will reduce near-shore tidal exchange in the affected upland area and will extend the residence time for the bioremediation solutions. The joints of the new sheetpile bulkhead will be sealed to provide a more complete hydraulic barrier.

If the restoration timeframe is longer than estimated, institutional controls will be implemented to provide the following protections until the Site is restored:

- Require maintenance of the Site's pavement and gravel cap
- Prevent the use of Site groundwater for drinking water
- Ensure the proper management of excavated soil or groundwater and appropriate worker safety associated with any future intrusive activities through implementation of a soil and groundwater management plan until cleanup standards are achieved in accordance with WAC 173-340-440.

4.4.3 BIOREMEDIATION AND MONITORED NATURAL ATTENUATION

Bioremediation will be implemented by injecting anaerobic biostimulants such as ammonium nitrate and monoammonium phosphate into to the subsurface (specific chemicals/volumes/concentrations will be determined in remedial design). These reagents will act as electron acceptors to stimulate growth of microbes naturally present in the soil that, if stimulated, will increase the rate at which they degrade petroleum hydrocarbons. While the effects of bioremediation will be more pronounced in groundwater, it is expected to also speed the cleanup of the saturated soil and the intermittently unsaturated soil within the smear zone.

It is anticipated that a series of up to 12 injection events will be conducted over the course of up to 4 years. During this time, compliance monitoring will be conducted and the resulting data used to optimize the bioremediation effort. Based on the concentrations of contaminants and remedial agents detected in monitoring wells spread throughout the Site, the subsequent injection formulations (volumes and biostimulant solution concentrations) and injection locations may be adjusted to maximize bioremediation rates throughout the Site. It is expected that groundwater contamination will be suppressed to below CLs throughout the bioremediation program, and that less biostimulant solution will be required over time, until CLs are maintained without additional injection. As a result, protection of surface water (identified as the most likely pathway for potential contaminant exposure) will be provided early on in the cleanup process.

The cleanup action also provides for a period of MNA to be conducted after completing the bioremediation program, if needed as a final polishing step to allow for IHS concentrations to reduce to below cleanup standards. It is the intent of the cleanup action to use active cleanup measures to minimize the restoration timeframe to the greatest degree practicable. MNA would be applied only after the removal and bioremediation efforts have successfully reduced the concentrations of contaminants to the degree that the restoration timeframe through MNA would be considered reasonable in accordance with this plan and MTCA guidelines. If the evaluation of monitoring data indicates additional active remedial action is

required to achieve cleanup standards within a reasonable restoration timeframe, further bioremediation or hotspot removal through excavation could be implemented prior to the use of MNA to achieve cleanup standards.

4.4.4 COMPLIANCE MONITORING

Compliance monitoring will consist of protection monitoring during source removal, performance monitoring following remedial excavation, and groundwater and cap integrity confirmation monitoring.

Protection monitoring will include measures to prevent exposure of workers and the public to hazardous materials during source removal and will be provided through appropriate health and safety protocols outlined under a site-specific health and safety plan. Performance monitoring of the source removal activities will be accomplished by collecting soil samples from the excavation floor and sidewalls to document conditions remaining in place.

Confirmation monitoring will consist of groundwater sampling to monitor the progress of bioremediation and MNA, and routine monitoring of the pavement cap integrity. The scope, schedule, and procedures for compliance monitoring will be presented in a compliance monitoring plan developed in the Engineering Design Report prepared as part of the remedial design for the cleanup action.

4.5 HAZARDOUS SUBSTANCES TO REMAIN IN-PLACE

The extent of contamination was determined during the RI based on conservative interpretations of boring logs and Site analytical data. Based on the estimated areal extent and thickness of impacted soil, the total volume of TPH-G- and VOC-impacted soil is 10,000 cubic yards (yd³). The remedial excavation and associated LNAPL recovery is expected to remove approximately 2,000 yd³ (3,000 tons) of highly contaminated soil and LNAPL representing approximately 70 percent of the total Site contamination by mass. Contaminated soil remaining outside the zone of excavation is generally present in the "smear zone" near the groundwater table within a vertical interval extending from approximately 8 to 12 ft BGS. This remaining contaminated soil will be treated along with groundwater during the bioremediation phase such that no contamination exceeding the CLs is planned to be left in place following completion of the cleanup action.

4.6 RESTORATION TIMEFRAME AND CLEANUP ACTION SCHEDULE

The restoration timeframe for implementing the cleanup action presented in this CAP is expected to require between 5 and 8 years. Implementing the cleanup action includes the following design and remedial activities:

Design Activities

- Conducting a pre-remedial design investigation to provide additional data required to prepare the EDR and detailed construction plans and specifications
- Preparing the EDR
- Preparing detailed construction plans and specifications

Remedial Activities

- Site preparations and source removal
- Temporary containment system and sheetpile bulkhead
- Bioremediation and MNA
- Compliance monitoring.

Design activities will be initiated in 2016 and are anticipated to be complete by June 2017 to support remedial activities commencing during the summer construction season in 2017. The actual start date for remedial activities and thus overall restoration timeframe may be affected by the availability of project funding. Based on the estimated restoration timeframe and project schedule, it is estimated the Site will achieve compliance with cleanup standards between 2022 and 2025.

5.0 COMPATIBILITY WITH SITE REDEVELOPMENT

Implementation of the cleanup action will be coordinated with the long-term redevelopment strategy for the Site. Specific redevelopment plans for the Site and vicinity are currently being developed by the Port. Site use could involve the construction of a new marine fueling facility, development as part of a commercial boatyard, expansion of fish processing operations, or other marine-based commercial or light industrial activities. Regardless of its specific use, the use will remain consistent with current zoning and the existing master plan.

6.0 REFERENCES

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Bulkhead

LegendImage: Supplemental Bioremediation Injection PointImage: Supplemental Bioremediation Injection PointImage: Supplemental Bioremediation Paved SurfaceImage: Bioremediation Infiltration Trench Nitrate Flow DirectionImage: Supplemental Bioremediation Riprap SlopeImage: Supplemental Bioremediation Riprap SlopeImage: Supplemental Bioremediation Infiltration Trench Nitrate Flow DirectionImage: Supplemental Bioremediation Riprap SlopeImage: Supplemental Bioremediation Riprap SlopeImage: Supplemental Bioremediation Infiltration Trench Monitoring WellImage: Supplemental Bioremediation Recovery WellImage: Supplemental Bioremediation Recovery WellImage: Supplemental Bioremediation Proposed Sheetpile BulkheadImage: Supplemental Bioremediation Riprap SlopeImage: Supplemental BioremediationImage: Supplemental Bioremediation Proposed Sheetpile BulkheadImage: Supplemental Bioremediation Riprap SlopeImage: Supplemental BioremediationImage: Supplemental Bioremediation Proposed Sheetpile BulkheadImage: Supplemental Bioremediation Riprap SlopeImage: Supplemental BioremediationImage: Supplemental Bioremediation Riprap SlopeImage: Supplemental BioremediationImage: Supplemental Bioremediation <th>Scale in Feet</th> <th> Remedial Alternative 2 Includes the Following Actions Remove AST system and adjacent buildings. Excavate contaminated soil (and LNAPL) from source area to a maximum depth of 12 ft BGS. Export material for offsite treatment and/or disposal. Extend sheetpile bulkhead to the north 60 ft. Implement bioremediation program by injecting nutrients and electron acceptors. Construct and maintain a surface containment system to prevent direct contact with contamination until cleanup standards are achieved using pavement and permeable soil to match existing surface conditions. Implement institutional controls if needed to ensure the integrity of the containment system until cleanup standards are achieved. for Bellingham 2011, Walker and Associates, Inc. </th>		Scale in Feet	 Remedial Alternative 2 Includes the Following Actions Remove AST system and adjacent buildings. Excavate contaminated soil (and LNAPL) from source area to a maximum depth of 12 ft BGS. Export material for offsite treatment and/or disposal. Extend sheetpile bulkhead to the north 60 ft. Implement bioremediation program by injecting nutrients and electron acceptors. Construct and maintain a surface containment system to prevent direct contact with contamination until cleanup standards are achieved using pavement and permeable soil to match existing surface conditions. Implement institutional controls if needed to ensure the integrity of the containment system until cleanup standards are achieved. for Bellingham 2011, Walker and Associates, Inc. 	
4	LANDAU origir	k and white reproduction of this color nal may reduce its effectiveness and to incorrect interpretation.	Blaine Marina Inc. Site Blaine Harbor Blaine, Washington	Selected Cleanup ActionFigureSource Removal and Bioremediation3

TABLE 1 SITE CLEANUP LEVELS BLAINE MARINA INC. SITE BLAINE, WASHINGTON

IHS	Unsaturated Soil Cleanup Level (mg/kg) (a)	Saturated Soil Cleanup Level (mg/kg) (a)	Groundwater Cleanup Level (mg/L) (b)	Soil Vapor (μg/m ³)
1,3-Butadiene	(C)	(c)		2.8
Benzene	0.014	0.005	0.0024	11
Ethylbenzene	18	1		
Total Xylenes	9.100	0.052		
TPH-D	2,000	2,000	0.500	
TPH-G	30 (d)	30 (d)	0.800	
Total Naphthalene's	2.30	0.12	0.083	

Notes:

(a) Cleanup level based on lowest soil criteria corrected for practical quantitation limit (PQL) and background.

(b) Cleanup level based on lowest Water Quality Standard or PQL, unless noted otherwise.

(c) -- = Not applicable because constituent is not an Indicator Hazardous Substance for the medium.

(d) MTCA Method A cleanup level is 100 mg/kg if benzene is not present and the total of ethylbenzene, toluene, and xylenes is less than 1% of the gasoline mixture; otherwise the cleanup level is 30 mg/kg.

EXHIBIT B

Site Diagram



EXHIBIT C

Engineering Design Report

Engineering Design Report Blaine Marina, Inc. Site Blaine, Washington

June 25, 2018

Prepared for

Port of Bellingham Bellingham, Washington



130 2nd Avenue South Edmonds, WA 98020 (425) 778-0907

Engineering Design Report Blaine Marina, Inc. Site Blaine, Washington

This document was prepared by, or under the direct supervision of, the technical professionals noted below.

Jeremy M. Davis, PE

Primary Author

*Use project role or billing title (e.g., Project Manager, Primary Author, or Senior Staff Scientist, etc.)

Document reviewed by:

Document prepared by:

Quality Reviewer

<u>Scard</u> Larry D. Beard, PE, LHG

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 Project Coordinator:
 Christopher C. Young


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1 Site Cleanup Levels

APPENDICES

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- A Pre-Remedial Design Investigation Data Report
- B Hazardous Building Materials Survey
- C Geotechnical Conditions and Sheetpile Design Reports
- D Bioremediation Design Parameters

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LIST OF ABBREVIATIONS AND ACRONYMS

ACM	asbestos-containing material
AHERA	Asbestos Hazard Emergency Response Act
AST	aboveground storage tank
bgs	below ground surface
BMP	best management practice
BTEX	benzene, toluene, ethylbenzene, and xylenes
CAP	cleanup action plan
CFR	Code of Federal Regulations
CL	cleanup level
CMP	compliance monitoring plan
CQA	construction quality assurance
CQC	construction quality control
Ecology	Washington State Department of Ecology
EDR	engineering design report
IHS	indicator hazardous substance
ft	foot/feet
FS	feasibility study
HASP	health and safety plan
HBMS	hazardous building materials survey
LAI	Landau Associates, Inc.
	Landau Associates, Inc. pound
lb	
lb LNAPL	pound
lb LNAPL MCL	pound light non-aqueous phase liquid
lb LNAPL MCL mg/kg	pound light non-aqueous phase liquid maximum contaminant level
lb LNAPL MCL mg/kg mg/L	pound ight non-aqueous phase liquid maximum contaminant level milligrams per kilogram
lb LNAPL MCL mg/kg mg/L mg N/L	pound ight non-aqueous phase liquid maximum contaminant level milligrams per kilogram milligrams per liter
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Ib LNAPL MCL mg/kg mg/L mg N/L MLLW MNA MTCA NOAA PCB PEL	pound
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Ib LNAPL MCL mg/kg mg/L mg N/L MLLW MNA MTCA NOAA PCB PEL Port PVC RAO	pound light non-aqueous phase liquid maximum contaminant level milligrams per kilogram milligrams per liter mean lower low water monitored natural attenuation Model Toxics Control Act tional Oceanic and Atmospheric Administration polychlorinated biphenyl permissible exposure limit Port of Bellingham polyvinyl chloride
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LIST OF ABBREVIATIONS AND ACRONYMS (CONTINUED)

SMA	Shoreline Management Act
SWPPP	stormwater pollution prevention plan
трн	total petroleum hydrocarbons
TPH-D	diesel-range total petroleum hydrocarbons
TPH-G	gasoline-range total petroleum hydrocarbons
VOC	volatile organic compound
WAC	Washington Administrative Code

1.0 INTRODUCTION AND PROJECT BACKGROUND

Landau Associates, Inc. (LAI) prepared this engineering design report (EDR), which provides preliminary design plans for the final cleanup action at the Blaine Marina, Inc. cleanup site (Site), along with the engineering basis for design. The cleanup action described in this EDR is based on implementing the approved cleanup action plan (CAP) (Ecology 2016) as required by the Amended Agreed Order between the Washington State Department of Ecology (Ecology) and the parties to the Order (Ecology 2012, 2017). The table below summarizes Site identification information and parties to the Order:

Site Name:	Blaine Marina, Inc.
Site Location: 214 Sigurdson Avenue, Blaine, Washington	
Facility Site Identification No.:	2888
Agreed Order No.:	DE 9000
Effective Date of Order:	May 25, 2012; and as amended May 5, 2017
Parties to the Order:	Port of Bellingham
Current Property Owner:	Port of Bellingham, Washington State Department of Natural Resources

Contamination is being cleaned up to bring the Site into compliance with Washington State cleanup standards, under the authority of the Model Toxics Control Act (MTCA), Chapter 70.105D of the Revised Code of Washington (RCW), and the MTCA Cleanup Regulation, Chapter 173-340 of the Washington Administrative Code (WAC). Preparing this EDR is a required element of the MTCA Cleanup Regulation, in order for Ecology to evaluate whether the preliminary plans and engineering basis for the cleanup action are reasonable and consistent with the Agreed Order and applicable regulations.

1.1 Site Background

The Site is located in Blaine, Washington within Blaine Harbor (Figure 1), at the north end of Drayton Harbor in the northwest quarter of Section 1, Township 40 North, Range 1 West, Willamette Meridian. Blaine Marina, Inc. leased approximately 39,000 square feet of property at 214 Sigurdson Avenue from the Port of Bellingham (Port) from the 1950s, until it vacated the leasehold in 2015. In addition to other retail activities, Blaine Marina, Inc. operated a bulk fuel storage and transfer facility that resulted in the release of petroleum hydrocarbons to soil and groundwater at the Site.

The Site boundary based on the remedial investigation is shown on Figure 2. Ultimately, the Site includes all areas where hazardous substances have been deposited, stored, disposed of, placed, or otherwise have come to be located. With the exception of the vicinity map provided as Figure 1, the plan-view figures in this report are oriented to the northwest. Descriptions of direction in this report are in reference to *map north*, which is toward Marine Drive.

1.1.1 Site History and Operations

The history of Site development and operations are presented in the remedial investigation/feasibility study (RI/FS) report (LAI 2015) and in the CAP (Ecology 2016), based on a review of existing environmental reports related to previous Site investigations and a review of historical aerial photographs taken between 1949 and 2011. A brief summary of relevant Site history is provided below:

Year	Relevant Activity/Operations
1930s	Blaine Harbor was originally constructed by dredging 2 acres of tideflats to create a small boat harbor and the uplands on which the Site is located.
1940s	Harbor expansion: 4 additional acres were dredged, additional tidelands were filled; added a breakwater, bulkheads, floats, and boat ramps.
1950s	Harbor expansion: 15 additional acres were dredged; breakwater was extended. Improvements to upland facilities including additional building and aboveground storage tanks (ASTs) to support the storage of fuel dispensed at the fuel dock and a horizontally oriented AST for heating oil; Blaine Marina, Inc. operating, selling furniture, appliances, and fuel products.
Operations through 2011	Reported releases of fuel during AST filling; Blaine Marina, Inc. replaces metallic fuel pipes with non-metallic hose. Indications of contamination prompt the initiation of an RI/FS to determine the nature and extent of contamination, and develop a cleanup strategy.
May 2015	Blaine Marina, Inc. ceases operations.
2011-2017	Interim action conducted in 2012 included demolition of the former fuel office building and repair of a failing section of bulkhead. RI/FS conducted from 2011 to 2016; fueling operations cease in 2015; CAP developed by Ecology in 2016; pre-remedial design investigation data collected in 2016 and 2017.

1.1.2 Site Investigations

A number of environmental investigations were conducted at the Site prior to developing the CAP. The RI/FS report (LAI 2015) summarized historical investigations and detailed those conducted for the RI as part of the Agreed Order.

In 2016 and 2017, the Port collected additional data after completing the RI/FS, to support design of the remedial action in what is referred to herein as the pre-remedial design investigation. This included additional soil and groundwater characterization in areas previously unavailable for sampling (e.g., beneath the furniture retail building), professional surveying to support preparation of construction plan drawings, and a survey of potential hazardous building materials for buildings planned for demolition as part of the cleanup action. These additional data were used to support development of this EDR, and are described further in Section 3 and Appendices A and B.

1.2 Cleanup Action Goals

The CAP describes the final cleanup action for the Site that was selected by Ecology based on the results of the RI/FS conducted from 2011 to 2016. The CAP specifies the cleanup approach that will be taken and the applicable standards by which cleanup will be assessed. The goal of the cleanup action presented in the CAP and explained further in this EDR is to meet remedial action objectives (RAOs) identified below, and bring the Site into compliance with Washington State cleanup standards.

The RAOs identified for the Site consist of:

- **RAO-1:** Remove the fuel storage and dispensing system and recoverable light non-aqueous phase liquid (LNAPL) to eliminate any ongoing sources of contamination
- **RAO-2:** Prevent human or terrestrial ecological receptors from being exposed to hazardous substances through direct contact with contaminated media (soil and groundwater)
- **RAO-3:** Prevent hazardous substances in soil from leaching to groundwater at concentrations that exceed the groundwater cleanup levels (CLs)
- **RAO-4:** Prevent hazardous substances in soil from migrating (by erosion) to marine sediment at concentrations that exceed marine sediment CLs
- **RAO-5:** Prevent hazardous substances in groundwater from migrating to surface water and marine sediment at concentrations that exceed the groundwater CLs
- **RAO-6:** Prevent use of shallow Site groundwater for drinking.

2.0 ENVIRONMENTAL CONDITIONS

Site conditions related to geology, hydrogeology, and contaminant concentrations were evaluated extensively during a series of investigations, as detailed in the RI/FS report (LAI 2015). This section contains a brief summary of these findings as they relate to design of the cleanup action.

2.1 Geology and Hydrogeology

The RI/FS report provides a detailed description of the geology and hydrogeology of the Site. In summary:

- Much of the Site is covered with asphalt pavement or buildings, which is underlain by 0.5 to 2 feet (ft) of a granular fill trafficking layer (sand and gravel), though in some locations, such as along the bulkhead in the western portion of the Site, the maximum thickness of the trafficking layer was observed to be as much as 4 ft.
- Near the ASTs, the surface is composed of pervious gravel (Figure 2); outside of this area, the surface is covered with asphalt pavement or buildings.
- Beneath the surface and trafficking layer, up to 15 ft of dredge fill was encountered, which consists of two general types of fill:
 - A sandy to silty clay unit that is generally present in large lenses, including a massive deposit underlying the fuel storage area
 - Interbedded fine sand, slightly silty to silty fine sand, and sandy silt.
- Below the interpreted limits of the dredge fill, fine sand to silty fine sand was encountered, which appear to be native marine deposits. This contact is inferred based on changes in the abundance of shells, observations of sulfur-like odors, or a darkening from light to dark gray color. Lithologic changes typically observed at the fill/native interface included the reduced presence of clay deposits, reduced silt content, and an increase in poorly graded, fine sand.
- Glaciomarine drift was encountered below the fine sand at approximately 25 ft below ground surface (bgs) and consists of very soft to medium stiff, silty clay and pockets of sandy clay to the maximum depth of the exploration (46.5 ft bgs). It is likely that the clay deposits encountered in the dredge fill originated from dredging of glaciomarine drift.

Groundwater flow at the Site appears to be heavily influenced by recharge in the unpaved, gravelly area near the ASTs. A slight groundwater mound is noticeable in this area (near the ASTs), indicating some component of flow in all directions, though primarily to the west-southwest, which is the closest point of discharge for Site groundwater to surface water. The depth to groundwater ranged from approximately 7 to 10 ft bgs across the Site, considerably shallower during the wet season than the dry season. In early 2017, after a season of heavy rain, groundwater elevations were noted to be 1 to 3 ft shallower than typical during dry season monitoring events.

The Site is adjacent to marine surface water. The RI evaluated surface water and sediment quality and confirmed that Site contamination is limited to the uplands. This is likely attributable to the fine-grained nature of the soil used to construct the uplands in the 1930s and 1940s. The material

dredged from the mudflats contains a significant amount of silt and clay, which has limited contaminant migration, resulting in the highest concentrations of contamination (including LNAPL) near the source area (near the ASTs). Although the marine environment appears to have been protected, the cleanup will include aggressive source removal actions in the uplands and further shoreline protection (installation of a sheetpile bulkhead with sealed joints) based on the close proximity to surface water, and the sensitive nature of receptors in the marine environment.

2.2 Site Contamination

This section briefly summarizes the findings of the RI related to the nature and extent of contamination by describing the indicator hazardous substances (IHSs) identified in the RI/FS report and established in the CAP. The RI was conducted in multiple phases, refining the understanding of environmental conditions with additional explorations and data collection until the nature and extent of contamination was adequately delineated. The investigations indicate that contamination related to releases of petroleum products is present in groundwater, soil, and soil vapor at the Site. The contamination is greatest in the source area, near the ASTs. In this area, contamination is generally observed from fairly shallow depths (due potentially to surface releases) to about 12 ft bgs, with a significant decrease in concentrations below 10 to 11 ft bgs. Contamination in soil and groundwater generally decreases in concentration moving outward in all directions from the source area, to below CLs at the distance approximated by the Site boundary shown on Figure 3. Most of the contamination at the Site is limited to a zone several feet thick, near the groundwater table elevation.

An extensive list of contaminants associated with petroleum hydrocarbons were analyzed for in all Site media. The IHSs listed below were developed from the initially larger suite of contaminants of potential concern in accordance with MTCA procedures, based on evaluation of the RI data, and in coordination with Ecology. The Site IHSs were selected to represent the nature and extent, and risk-drivers, that were important in determining where cleanup activities will occur, and to what degree they must be taken. Although there may be some contaminants present in addition to the IHSs, it has been determined that they are typically co-located with the IHS, present lower risks of impacts to human health or the environment, and will be addressed by the cleanup actions that target the following IHSs:

- Soil:
 - Diesel-range total petroleum hydrocarbons (TPH-D)
 - Gasoline-range total petroleum hydrocarbons (TPH-G)
 - Volatile organic compounds (VOCs): benzene, ethylbenzene, xylenes, naphthalenes
- Groundwater:
 - TPH-D
 - TPH-G
 - VOCs: benzene, naphthalenes

- Soil Vapor:
 - VOCs: benzene, 1,3 butadiene

Figure 3 shows the RI sample locations and the Site boundary that approximate the lateral extent of the IHSs as determined during the RI and adjusted by the results of the pre-remedial design investigation discussed further in Section 3 of this report. As indicated on Figure 3, the highest levels of contamination are present in the area near the ASTs, identified during the RI/FS as the source area, likely due to releases of fuel to the ground surface within the pervious secondary containment system around the ASTs.

2.3 Cleanup Standards

Site cleanup standards consist of: 1) numerical CLs defined by regulatory criteria to provide protection to both human health and the environment, and 2) the points of compliance at which the CLs must be met.

The following sections provide additional details regarding the CLs for Site IHSs, which are summarized in Table 1. For this cleanup, the points of compliance (where attainment of numerical CLs must be achieved) includes the entire Site for soil (WAC 173-340-740[6]), groundwater (WAC 173-340-720[8]), and soil vapor (WAC 173-340-750[6]).

2.3.1 Groundwater

Numerical CLs for groundwater were evaluated in the RI/FS for protection of various receptors or migration pathways. The evaluation resulted in development of CLs that protect for groundwater discharge to surface water (i.e., Blaine Harbor). The CLs provide protection for aquatic organisms, benthic organisms, or human consumption of aquatic organisms.

Since TPH-G and TPH-D do not have surface water criteria and because available literature indicates that MTCA Method A groundwater CLs are adequately protective of aquatic organisms, MTCA Method A groundwater CLs were evaluated for these IHSs. Groundwater CLs for VOCs are MTCA Method B values protective of vapor intrusion.

2.3.2 Soil

Based on the potential exposure pathways and receptors evaluated in the RI/FS for unrestricted Site use, numerical criteria were developed to protect for potential impacts to surface water (through the groundwater pathway), the lowest and most-protective of the CLs. Because the CLs for soil are based on calculated impacts to groundwater (assuming three-phase partitioning), it may be possible to demonstrate compliance through empirical demonstration of attaining groundwater cleanup standards throughout the Site. This will be further evaluated in the compliance monitoring plan.

2.3.3 Soil Vapor

The VOC concentrations in soil vapor observed during the RI were acceptable for potential work exposures at Site buildings. As a conservatively protective measure, CLs were developed to be protective of unrestrictive Site use (to include residential occupancy) and adapted in the CAP based on MTCA Method B indoor air CLs.

3.0 PRE-REMEDIAL DESIGN INVESTIGATION SUMMARY

The pre-remedial design investigation was conducted to collect additional data that were needed to complete the design of the cleanup action. The Site data obtained during the RI sufficiently addressed MTCA requirements for completing an RI/FS; however, additional data were needed to support preparation of detailed construction plans. The pre-remedial design investigation was conducted in 2017, and included the following activities:

- Land Surveying:
 - Significant Site features (buildings, permanent equipment, etc.)
 - Surface elevations
 - Overhead and underground utilities
- Evaluate Building Conditions:
 - Visually inspect general building conditions
 - Conduct a hazardous building materials survey (HBMS)
- Additional Soil Investigation
 - Conduct field screening for contamination by advancing borings and test pits to evaluate core and sidewall soil samples
 - Collect and analyze additional subsurface soil samples to supplement the Site characterization data
- Additional Groundwater Investigation
 - Collect and analyze groundwater samples from existing monitoring wells and groundwater grab samples from direct-push borings.

The results of the pre remedial design investigation are provided in Appendix A and B and summarized in the following sections.

3.1 Land Surveying and Site Topography

Upland and aquatic areas of the Site were surveyed to support cleanup design activities. The upland and bathymetric surveys (conducted by Wilson Surveying/Engineering in 2011 and 2017) were combined to develop an accurate 0.5-ft contour plan of the Site appropriate for design. The Site plan (presenting a 1-ft contour interval) is shown on Figure 2 and is used as the base plan for the remainder of the plan figures. The horizontal datum for the survey is NAD83¹/07 WA North Zone, and the vertical datum is National Oceanic and Atmospheric Administration (NOAA)/Tidal mean lower low water (MLLW) = 0.00". To convert the MLLW datum to the NAVD88² reference data, 1.02 ft would be

¹ North American Datum of 1983.

² North American Vertical Datum of 1988.

added to the NAVD value. For example, a benchmark monument having an NAVD88 elevation of 15 ft would have a MLLW elevation of 16.02 ft.

3.2 Hazardous Building Materials Survey

An inspector with certification under the Asbestos Hazard Emergency Response Act (AHERA) conducted the HBMS to support planning for demolition of the structures that must be removed to implement the remedial excavation. The survey included the furniture retail building, two smaller storage buildings adjacent to the northeast, and three ASTs just north of the furniture retail building. Each structure was surveyed for asbestos-containing material (ACM), lead-containing paint, polychlorinated biphenyls (PCBs)-containing materials, and miscellaneous hazardous materials-containing equipment. Additionally, one composite sample of the painted materials in the structures was collected for waste designation analysis using the Toxicity Characteristic Leaching Procedure for lead to evaluate whether waste streams containing the painted materials would be considered dangerous wastes under Chapter 173-303 WAC.

The survey procedures, regulatory framework, results, and findings are detailed in the HBMS report provided in Appendix B and summarized below. The results of the survey indicate some abatement of hazardous building materials will be required during demolition of Site structures to ensure worker safety and provide for proper disposal. The construction plans and specifications will include the associated procedures and requirements for the abatement contractor based on the findings summarized below.

3.2.1 Building Materials – Asbestos

Samples of building materials were collected for asbestos analysis from various paints, vinyl floor tiles, gypsum wallboard systems, cove base, built-up roofing materials, carpets and associated adhesives, acoustic ceiling tiles, faux-wood paneling and associated adhesive, leveling compound, popcorn ceiling texture, gaskets on the tank piping and access hatches, and caulks. A minimum of one sample was collected of each potential or suspect ACM type from each homogeneous area.

Five of the materials sampled in the structures were identified as ACM (defined under AHERA as a material containing greater than 1 percent asbestos), during the HBMS:

- Popcorn ceiling texture on the first floor ceiling;
- Beige vinyl floor tiles at the west end of the first floor;
- Silver-coat roofing paint on the west side of the roof; and
- Gaskets on the lower access hatches of the northern and middle ASTs.
- One fire door, assumed to contain ACM insulation, was also observed during the survey, but was not opened and inspected as that would void the door's warranty.

These materials identified as ACM will be abated in accordance with all appropriate state and federal regulations prior to demolition of the structures. The popcorn ceiling texture and silver-coat paint are considered to be friable under AHERA.

3.2.2 Building Materials – Lead

Paints sampled during the HBMS included silver-coat roofing paint, gray-blue exterior wall paint, white exterior trim paint, multiple colors of interior wall paints, white paint under faux-wood paneling, red and gray exterior foundation wall paint, and gray-blue paint on the ASTs. Lead was detected in 16 of the 23 samples collected at concentrations ranging from 82 milligrams per kilogram (mg/kg) to 18,000 mg/kg.

The waste designation sample consisting of a composite of each of the paints sampled along with the underlying substrate was found to contain less than 0.5 milligrams per liter (mg/L) of lead. This is below the dangerous waste toxicity characteristic threshold for lead of 5 mg/L.

3.2.3 Building Materials – PCBs

Two composite samples of potential PCB-containing materials were collected during the survey for laboratory analysis. Each composite sample consisted of similar material types (i.e., paints observed in and on the buildings, and various caulks and sealants). PCBs were not detected in the either of the two composite bulk material samples analyzed.

Fluorescent light fixtures in the buildings were screened for PCB-containing light fixture ballasts using a hand-held ballast checker, which can distinguish magnetic ballasts that typically contain PCBs from electronic ballasts that do not. Fixtures indicated to be magnetic using the ballast checker were opened and the ballasts were inspected for "No PCBs" stickers. Those without "No PCBs" stickers are assumed to contain PCBs.

A total of 87 fluorescent light fixtures containing 204 fluorescent light tubes and 87 ballasts were observed in the buildings. Based on the results of the ballast-checker screening and inspection of a limited number of fixtures, no PCB-containing ballasts are expected to be present in the buildings.

3.2.4 Miscellaneous Building Materials

During the HBMS field work, a thermostat located inside the Verizon telecommunications room on the second floor of the Blaine Marina, Inc. building was opened and observed to contain mercury switches. The other thermostats in the building were subsequently opened and inspected. No other mercury switches were observed. The thermostat with mercury switches will be removed by the abatement contractor and disposed of in accordance with the appropriate state and federal regulations.

3.3 Additional Soil and Groundwater Characterization

Additional soil and groundwater samples were collected to better delineate the extent of the highly contaminated soil (source material) to be removed during the cleanup action. A total of 24 soil samples collected from the smear zone near the groundwater table, and 13 groundwater samples were analyzed in the laboratory to support the remedial design. Results are provided in Appendix A.

During this investigation, a direct-push drilling rig was used to collect core soil samples from the ground surface to approximately 15 ft bgs. The soil cores were field-screened for contamination and soil samples were collected for laboratory analysis from the vertical interval approximately 2 ft above to 2 ft below the groundwater table. Field-screening observations were used to improve the understanding of the lateral extent of heavily contaminated soil. A readily observable sheen was present in the source area, and was observed during this investigation to the east and west of the ASTs, though notably, the sheen was not present as far west as the borings near the existing bulkhead. These observations and laboratory results were used to refine and expand the RI/FS and CAP reports.

Groundwater samples were collected from seven existing monitoring wells and groundwater grab samples were collected from five of the direct-push borings. Six of the locations exhibited concentrations of TPH-D that exceeded the CL (500 mg/L). Total petroleum hydrocarbons (TPH) in the oil range were not detected at concentrations greater than the laboratory reporting limits, except in the grab sample from boring BMI-GP-27, which is located in the northwest corner of the furniture store footprint. Concentrations of TPH-G were detected in six of the groundwater samples, but exceeded the 800 mg/L CL only at monitoring well MW-7.

Prior to sampling, field personnel measured the depth to groundwater and LNAPL thickness on top of groundwater, if it was present. LNAPL was encountered in areas where it was previously detected (MW-1, MW-2, and MW-3), as expected, but also at MW-9 and MW-10, where it had not been observed in the past. At MW-10, LNAPL was observed with a thickness of approximately 0.25 ft, and at MW-9, it was present with a thickness of 2.4 ft. The thickness of accumulated LNAPL in MW-9 warranted further investigation, so two additional investigations were conducted: an LNAPL recoverability test and further soil observations by advancing test pits near monitoring well MW-9.

3.3.1 LNAPL Recoverability Test

The recoverability test included removing the LNAPL from MW-9 and monitoring its recovery, then using a spreadsheet tool to determine LNAPL transmissivity. The recovery data can be used in this manner to evaluate if hydraulic recovery of the LNAPL is feasible.

The test was conducted on May 18, 2017. LNAPL thickness at the start of the test was 2.81 ft. The LNAPL was removed (by pump) and recovery was observed over the course of 6 hours. During this

time, the LNAPL did not fully recover to its original thickness. The final thickness was 1.03 ft. The poor recovery was insufficient to calculate an LNAPL transmissivity. It is likely that the observed LNAPL recovery was recharge from the well sandpack, and that LNAPL transmissivity from the surrounding aquifer is very low. A follow-up measurement was collected after 1 month (June 19, 2017) at which time the thickness was 1.13 ft, supporting the conclusion that no recoverable LNAPL is present.

3.3.2 Test Pits

To provide additional information regarding the LNAPL observation at MW-9, five test pits were dug hydraulically upgradient and downgradient of MW-9, as shown on Figure 3. The goal was to evaluate whether a significant accumulation of LNAPL was present near MW-9. The test pits were each approximately 8 ft long, 3.5 ft wide, and 8.5 to 12 ft deep, depending on the depth to groundwater. Field personnel visually observed the test pit sidewalls and groundwater seepage for the presence of LNAPL. No LNAPL or heavy sheen was observed in any of the test pits. A slight sheen was observed in groundwater seepage from test pit TP-2 on the western wall at approximately 12 ft bgs, but was not observed on the eastern wall. Based on the test pit findings, it appears that there is not a significant amount of LNAPL in the soil formation surrounding MW-9, which is consistent with the results of the LNAPL recoverability test discussed in Section 3.3.1.

Although no significant LNAPL was found outside of the MW-9 well casing, the cleanup action has been modified to include LNAPL monitoring and recovery, to be conducted after the source area excavation, and prior to implementing bioremediation. However, it is not anticipated that a significant quantity of LNAPL will be observed that would require ongoing recovery efforts.

4.0 **CLEANUP ACTION – CONCEPTUAL DESIGN OVERVIEW**

This section provides a conceptual-level summary for each element in the cleanup action. Section 4.1 provides the general sequencing of the cleanup process and Section 4.2 provides a conceptual overview for each of the primary elements of the cleanup action. Further detail and the engineering basis of design are discussed in Section 5 of this report.

4.1 General Summary and Sequencing of the Cleanup Action

The flow chart below provides a general overview of the cleanup process. Prior to implementing the cleanup activities summarized below, this EDR will go through an agency and public review and comment period before being finalized. Detailed construction plans will be prepared based on the approved conceptual design in the EDR.



It is anticipated that construction activities will commence in 2018 and, based on an 8-year restoration timeframe, cleanup standards should be achieved in 2026.

4.2 Elements of the Cleanup Action

The following subsections provide a conceptual-level overview of the activities that will be included in the cleanup action, separated into the major components and sequenced in the general order of planned implementation.

4.2.1 Site Cleanup Preparations

The following activities are described as cleanup preparation. These actions do not directly affect soil or groundwater quality, but must be conducted as part of the cleanup action.

- Project permitting
- Contractor mobilization
- Decommissioning of groundwater monitoring wells currently located within the excavation boundary
- Demolition and removal of the buildings that currently prevent access for excavation
- Decommissioning and removal of the ASTs and ancillary equipment.

4.2.1.1 Project Permitting

The cleanup will include earthwork and other construction activities that typically require regulatory permitting. In accordance with MTCA, because this is a cleanup action, the project may not need to obtain all of the permits that would be required for a normal construction project. The project team will prepare permit applications and meet with the appropriate agencies to determine which permits are required, and when it is appropriate to meet the substantive requirements instead. Meeting the substantive requirements ensures conformance to the jurisdictional agency's input.

It is assumed that permits (or meeting the substantive requirements) will be necessary for building demolition, grading, the bulkhead improvement, and construction stormwater management. Additionally, MTCA requires compliance with applicable state and federal laws (WAC 173-340-710[1]). MTCA defines applicable state and federal laws to include legally applicable requirements and those requirements that are relevant and appropriate, although obtaining the actual permit may not be required. The relevant and appropriate regulations include:

- Clean Water Act Section 402 (b) and 40 CFR Part 123: The cleanup will be designed to allow stormwater to infiltrate to the interior of the Site and, therefore, have no surface water discharge off of the Site. However, the Port will apply for a National Pollutant Discharge Elimination System construction stormwater general permit that will be used during the upland cleanup action, including developing a construction Stormwater Pollution Prevention Plan (SWPPP) that provides specific procedures for stormwater management during cleanup of contaminated soil.
- Washington Water Pollution Control Act and its implementing regulation, Water Quality Standards for Surface Waters (Chapter 173-201A WAC). These regulations establish water quality standards for surface waters of the State of Washington consistent with public health

and the propagation and protection of fish, shellfish, and wildlife. These standards will be used to develop the appropriate stormwater best management practices (BMPs) for the Site.

- Washington Solid Waste Management Act (Chapter 70.95 RCW) and its implementing
 regulation, Criteria for Municipal Solid Waste Landfills (Chapter 173-351 WAC). These
 regulations establish a comprehensive statewide program for solid waste management,
 including proper handling and disposal. The management of excavated contaminated soil from
 the Site will be conducted in accordance with these regulations to the extent that the soil can
 be managed as solid waste.
- Shoreline Management Act (SMA; Chapter 90.58 RCW and WAC 173-26-201). This regulation establishes permitting and other requirements for substantial development occurring within waters of the US or within 200 ft of a shoreline, and requires that the activities in coastal zones be consistent with local regulations. MTCA exempts cleanup projects being conducted under an enforceable order or consent decree from the requirement of obtaining the shoreline permit; however, the cleanup must be conducted in accordance with the substantive requirements of the regulation.
- Hazardous Waste Operations (Chapter 296-843 WAC). This regulation establishes safety
 requirements for workers investigating and cleaning up sites containing hazardous materials.
 These requirements will be applicable to onsite cleanup activities and will be addressed in a
 Site health and safety plan (HASP) prepared specifically for these activities.

All work related to the cleanup action is planned to occur within the upland portion of the Site (i.e., above the mean higher high water) and the need for a Section 10 permit is not anticipated.

4.2.1.2 Mobilization and Site Preparation

The Site will be prepared for cleanup action construction. Site preparations include:

- 1. Installing 6-ft-high temporary chain-link fencing around the perimeter of the Site working areas. Working areas will change during the course of the cleanup. Initially, the work area will be established around the sheetpile installation areas, then around the building demolition areas, then around the source area excavation.
- 2. Lockable gates and informational signage will be used to provide Site security.
- 3. A wheel wash system and decontamination area will be installed before the exit from the fenced area during periods of work that could cause soil to be tracked off site (during excavation).
- 4. Traffic controls will be implemented as necessary to maintain roadway access to prevent disruption to nearby operations.
- 5. A temporary restroom will be provided for Site workers.

4.2.1.3 Hazardous Building Materials Abatement

Prior to building demolition, the hazardous building materials identified by the HBMS will be abated and removed from the Site for proper disposal in accordance with AHERA requirements, WAC 296-62-07712, and Section 570 of Northwest Clean Air Agency regulations. The friable ACM identified by the HBMS (popcorn ceiling texture and silver-coat paint) will require abatement in accordance with AHERA. Abatement of these materials will therefore be Class I asbestos work. Abatement of the non-friable floor tiles, gaskets, and fire door will be Class II asbestos work.

Lead hazards during demolition will be controlled through:

- Isolation of the area to prevent exposure to the public
- Misting of the area with water to control lead dust
- Use of best management practices to mitigate migration of lead dust into Site stormwater
- Preparation of a bid-specification providing methods to prevent worker exposure to lead.

The hazardous materials-containing equipment identified during the HBMS (fluorescent light tubes and mercury switches in one thermostat) will be removed prior to building demolition by the abatement contractor. The light tubes and thermostat will be managed and disposed of at an appropriate facility as Universal Wastes under WAC 173-303-573 and 40 CFR 273.

The following guidance specifications will be included in the bid package to provide the contractor with specific requirements that must be met for abatement or mitigation of the hazardous materials prior to and during demolition:

- Asbestos Abatement
- Mitigation of Lead Hazards
- Handling and Disposal of Universal Wastes.

The specifications will be prepared by a professional engineer licensed in the State of Washington and an AHERA-certified project designer.

4.2.1.4 Demolition of Aboveground Storage Tanks, Building, and Pavement

The ASTs and other ancillary equipment and the three buildings identified on Figure 4 (the furniture retail building and two smaller storage buildings) will be demolished and disposed of off site. This includes removing concrete pavement slabs and foundations within the footprint of the planned excavation. The equipment and buildings must be removed to prevent the ASTs and ancillary equipment from being a potential ongoing source of contamination, and to provide access for excavating the soil in the area with the highest levels of contamination.

Pavement and foundations will be reduced to manageable rubble using construction equipment and personnel equipped with pneumatic hammers or other equipment designed to break up concrete and asphalt. The connector plates will be removed from the beams, the beams removed from the foundation concrete and cut to a manageable length (as required by the waste acceptance criteria), and will be placed into dump trucks for disposal at a permitted municipal solid waste disposal facility or recycling, if practicable. Demolition debris will be intermittently sprayed with water (from a fire

hydrant, see Figure 6 for location) to minimize dust. Runoff from the dust control activities will be diverted to infiltration areas within the Site cleanup area.

Rubble from the demolition will be stockpiled in a designated area northwest of the Site. The demolition rubble will then be segregated, stockpiling concrete and asphalt separately from other debris that will be disposed of off site in conjunction with contaminated soil. Debris designated for disposal will be loaded onto dump trucks for transport and disposal at an inert waste landfill or municipal solid waste landfill, as applicable. Reinforcing steel will be separated from the onsite rubble, loaded onto dump trucks, and transported to a metals recycling facility. Concrete and asphalt rubble from the cleanup action demolition will be evaluated for potential beneficial reuse as roadway base course or roadway fill.

Additionally, two features will require demolition, which are currently located in the planned bulkhead extension alignment as shown on Figure 4. These features appear to be related to fish processing though it is not determined at the time of this EDR whether they are currently used, or simply historical remnants. Each of these features appears to have subsurface concrete vaults that will be removed in preparation of the bulkhead installation.

4.2.1.5 Decommissioning Monitoring Wells

Three existing monitoring wells will need to be decommissioned before excavation occurs because they are located within the excavation boundary. Wells MW-1, MW-2, and MW-3 will be decommissioned by a drilling contractor licensed in the State of Washington in accordance with Chapter 18.104 RCW.

4.2.2 Sheetpile Bulkhead and Temporary Shoring Installation

Prior to completing the RI, it was noted that a section of bulkhead along the western side of Sigurdson Avenue was failing, and could result in migration of contaminated soil (through erosion) to the marine environment. As an interim cleanup action, a sheetpile bulkhead was installed along the landward side of the failing timber bulkhead, which effectively stopped the shoreline failure.

Based on a recent assessment of the shoreline and bulkhead conditions in the vicinity (Reid Middleton 2017), the condition of the shoreline north of the section improved during the interim action is in fair condition and not in need of significant improvements. As a result, the final cleanup action may be successfully implemented without further bulkhead improvements. However, in recognition that additional shoreline protection or hydraulic isolation may assist in implementing the bioremediation program, this EDR includes planning for an extension of the sheetpile bulkhead to provide additional shoreline protection to the north, as shown on Figure 4. If this section is needed, the seams between the steel sheetpiles in the extension will be sealed to limit water passage through the bulkhead. As discussed further in Section 4.2.5.4, the necessity of installing this bulkhead improvement will be assessed when implementing the bioremediation program, in coordination with Ecology.

Temporary sheetpile shoring will be installed along the eastern side of Sigurdson Avenue to protect the roadway and utilities. This temporary shoring will allow the source area excavation to advance as close to Sigurdson Avenue as possible without undermining the significant number of subsurface utilities beneath the road that service many nearby buildings.

Prior to excavation of the source area, temporary sheetpile shoring will be installed along the west side of the excavation (the east side of Sigurdson Avenue) to protect the roadway and underlying utilities. The temporary shoring will be constructed with steel PZC-18 section sheetpiling, or equivalent as determined during remedial design, and will be driven to a minimum depth of 35 ft bgs. The alignment of the sheetpile is shown on Figure 4 and the conceptual details are shown in section-view on Figure 5. As detailed in Appendix C, the shoring has been designed to support the full lateral loads from earth pressures, hydrostatic loads from groundwater, and vehicle loading from construction equipment.

Prior to installation of the temporary sheetpile shoring, the alignment (and area nearby where utilities are known to be present) will be screened for the presence of utilities and subsurface obstructions by air-knife or hand-excavating a minimum width of the sheetpile to a depth of 4 ft. The excavated materials will be stockpiled and assessed for reuse as backfill at the Site. After clearance for utilities, the sheetpiles will be vibrated into place along the alignment.

4.2.3 Source Removal

The soil and groundwater in the vicinity of the ASTs are heavily contaminated from releases of petroleum products. LNAPL may be present in the source area, as shown on Figure 3. The cleanup action described in the FS and in the CAP included excavation of approximately 3,000 tons of soil from this area. Based on the results of the pre-remedial design investigation, the excavation has been expanded somewhat and is anticipated to remove between 3,000 and 4,000 tons of heavily contaminated soil from the source area. The goal of this action is to remove the most highly contaminated soil and all free-phase LNAPL from the Site, except for what is inaccessible to excavation, beneath Sigurdson Avenue.

Source removal will be conducted by excavating the heavily contaminated soil from within the approximate lateral extent of free-phase LNAPL in the source area, as shown on Figure 6 and in cross section on Figure 8. The excavation will extend from the ground surface to approximately 10 to 12 ft bgs (depending upon observations and safety conditions). The excavation will occur in the dry season (late summer to early fall) when groundwater levels are lowest for safety and to avoid the need for dewatering. Based on the RI data, an excavation depth of 9 to 11 ft bgs in the source area is anticipated to fully remove the highly contaminated soil. Concentrations of contaminants in soil decrease by orders of magnitude below this depth, as represented in the four closest soil borings to the ASTs (BMI-GP-14, BMI-GP-15, BMI-GP-17, and BMI-GP-20; LAI 2015).

When the groundwater table is encountered, the excavator bucket will be used to agitate soils below the groundwater table to release any remaining LNAPL that may be held by capillary forces, confirming removal. It is not anticipated that free-phase LNAPL will be present at this depth. Some contamination exists outside of the targeted vertical and horizontal extents, but at much lower concentrations than the source material. This residual contamination will be addressed after the excavation through bioremediation. Minor dewatering efforts within the excavation may be conducted as a contingency during construction. However, significant efforts to lower the groundwater table are not planned.

While the excavation is open and the groundwater table exposed, LNAPL may enter the excavation through the sidewalls. LNAPL that enters the excavation will be recovered using a vactor truck and/or sorbent pads to skim LNAPL from the exposed groundwater table. Field screening will be used to identify overburden soil that can be stockpiled and assessed for re-use as backfill at the Site. It is assumed that the upper 5 ft of soil at the northern, eastern, and southern extents of the excavation are not impacted, and might be suitable for use as backfill material after the source area removal.

For the purposes of this EDR, we assume that the excavated soil will be hauled to a municipal solid waste landfill (Resource Conservation Recovery Act Subtitle D facility) for disposal. However, based on the RI data, *ex situ* treatment by thermal desorption may be practicable, which would allow the soil (after treatment) to be used for other purposes, such as reclamation material, in accordance with Ecology guidance documents. This approach would be evaluated prior to implementation, but would not affect the removal process or Site conditions—only the final disposition of the removed materials.

The excavation will be conducted with standard construction equipment (e.g., trackhoes and frontend loaders), and it is anticipated that impacted soil will be loaded directly into dump trucks or intermodal containers. In the event that direct loading cannot be conducted, excavated soil will be temporarily stockpiled on Site and, if stockpiles are placed on clean soil surfaces, the surface will be adequately protected to prevent surface contamination (e.g., placed on plastic sheeting and covered with plastic sheeting held down with rope-connected sandbags or tires, if necessary).

Based on test pit observations, the soil to be excavated would be classified as Type B soil (per 29 CFR 1926 Subpart P; Appendix C) due to the variable nature of fill materials. Excavation will depend on the contractor's means and methods; however, no personnel will be allowed within the excavation or during backfill operations unless the cut slopes are laid back to 1 horizontal to 1 vertical (1H:1V) or flatter. Similarly, construction plans and specifications will indicate allowable equipment operations near the excavation edge based on maintaining slope stability during the construction effort.

The excavation will be backfilled with imported fill material, and possibly shallow Site soil excavated from the cleanup area if it does not exceed CLs and if it is considered geotechnically suitable for use as backfill. The source area will be backfilled with relatively permeable soil, so the entirety of the backfilled area can later be used as an infiltration gallery during bioremediation. While backfilling the

source area excavation, perforated polyvinyl chloride (PVC) piping will be installed near the base of the excavation, and vertical PVC risers will terminate in traffic-rated vaults at the ground surface. The installed equipment will allow for later introduction of bioremediation solutions in a manner intended to fill the backfilled excavation with the liquid that would then seep out of the source area along pathways formerly taken by TPH.

Backfilling will return the Site to the existing grade, and will return the Site to existing surface pervious conditions (e.g., compacted gravel surfaces in areas currently surfaced in gravel, and asphalt pavement where pavement or buildings currently exist). Upon completion of backfilling, the temporary sheetpile shoring will be removed and any resulting voids will be backfilled with compacted imported fill.

After source removal is complete, the newly installed surfacing will function as a clean soil cap to provide containment for the residual contaminated soil that will remain until bioremediation (discussed in Section 4.24 below) is complete. Although the surfacing will function as a temporary containment system, it is not anticipated to be necessary in the long term, so institutional controls are not anticipated to be required to maintain its integrity.

4.2.4 Non-Aqueous Phase Liquid Observation and Recovery

After completing the source removal and installation efforts described above, a period of no less than 2 weeks will be allowed for potential LNAPL accumulation. Monitoring for the presence of LNAPL will take place at the infiltration gallery (created when backfilling the source area excavation), at bioremediation infiltration trenches, and at existing and newly installed groundwater monitoring wells.

As noted in Section 4.2.3, after removing the source materials, the source area excavation will be backfilled in a manner so it functions as a large infiltration gallery. The equipment installed during backfilling will include perforated risers to facilitate monitoring for, and removing LNAPL if it is found present at recoverable levels. In addition to monitoring for LNAPL at the infiltration gallery, bioremediation trenches will also be installed, as shown on Figure 7. These trenches will also include perforated riser pipes to facilitate LNAPL monitoring and removal, if needed. And finally, four additional groundwater monitoring wells will be installed to supplement the existing monitoring network, and will provide for additional LNAPL monitoring.

At the end of the 2-week accumulation period, non-aqueous phase liquid (NAPL) observation wells and groundwater monitoring wells will be assessed for the presence of NAPL using an oil/water interface probe. If NAPL is observed accumulating at recoverable levels, the NAPL will be hydraulically captured and taken off site for disposal. It is not anticipated that appreciable quantities of NAPL would be present after conducting the source area removal efforts. However, the locations of infiltration trenches (and their NAPL monitoring components) have been selected to provide for NAPL monitoring and removal efforts, if needed, prior to implementing the bioremediation program, as described below.

4.2.5 Bioremediation and Monitored Natural Attenuation

A bioremediation program will be implemented after the source removal to reduce concentrations of IHSs until the Site is remediated and groundwater cleanup standards are achieved. To optimize the efficacy of bioremediation in a naturally reducing environment, nitrate will be used as an electron acceptor to stimulate anaerobic degradation, and will be introduced to the subsurface using the large infiltration gallery created when backfilling the source area excavation, and the treatment trenches shown in the conceptual layout on Figure 7.

The effectiveness of bioremediation is limited in areas containing significant free-phase LNAPL; therefore, bioremediation typically follows LNAPL removal to achieve cleanup in a reasonable restoration timeframe. This is due to the mass of electron acceptor required to treat a given mass of TPH (i.e., stoichiometry) and the low ratio of NAPL surface area to mass that makes TPH as LNAPL less available to micro-organisms for biodegradation.

Implemented after the source removal is complete and the highest levels of contamination are removed from the Site, bioremediation is anticipated to achieve cleanup standards within 4 years of beginning injections. As described further below, groundwater monitoring will be conducted throughout the bioremediation period to assess progress and inform potential modifications to the nitrate solution injection plans for subsequent injection events. As the bioremediation process nears completion, monitoring may indicate no additional nitrate is needed, but monitoring to confirm continued progress may be needed. This period of monitoring would be considered monitored natural attenuation (MNA). As previously mentioned, active measures (instead of MNA) will be used to the greatest extent practicable, and the MNA period is included for consideration only near the end of the cleanup process if no further active measures are warranted.

The following sections provide further details related to the design of the bioremediation program. Bioremediation design input parameters are provided in Appendix D.

4.2.5.1 In Situ Anaerobic Bioremediation Summary

In situ bioremediation of TPH typically consists of enhancing or stimulating naturally occurring aerobic or anaerobic biological processes in saturated subsurface soil and groundwater through the introduction of oxygen, nitrate, or sulfate. Macro/micro nutrients are also commonly added. The introduction of these reagents increases the rate of degradation of petroleum constituents in soil and groundwater by microbial activity when the natural degradation is limited by the availability of electron acceptors and nutrients. Data collected during the RI indicate limited availability of electron acceptors at the Site, which suggests that nitrate injection will likely stimulate the biological processes to degrade TPH.

Reagent introduction to the subsurface can be accomplished by various means. These include direct injection into wells or borings, or infiltration to trenches or infiltration galleries.

It is anticipated that multiple injections of nitrate will be required to complete treatment of residual TPH mass present in the aqueous and sorbed phases remaining following source removal. TPH concentrations in groundwater are expected to fluctuate during treatment until non-aqueous TPH mass is depleted. This fluctuation occurs because concentrations of TPH in groundwater may initially increase, as injection disturbance and biological treatment of aqueous-phase contamination can enhance desorption from the aquifer soil. Aqueous-phase TPH will be degraded by micro-organisms using nitrate as the electron acceptor. Upon the depletion of injected nitrate, contaminant concentrations are expected to rebound until additional nitrate is injected. It is understood that rebound will continue to occur as long as contaminant mass remains in the sorbed-phase or as residual NAPL within the aquifer or in upper portions of the smear zone are periodically contacted by a high water table.

4.2.5.2 Injection Approach – Infiltration Gallery and Trenches

As noted in Section 4.2.4, the source area excavation will be backfilled with non-contaminated sand and gravel, and will include two sections of horizontal perforated pipe installed near the groundwater table to create a large infiltration gallery for injection of bioremediation reagents. These infiltration galleries, shown on Figures 7 and 8, will allow injection events to introduce large quantities of bioremediation agents into the newly installed gravel backfill. The design approach includes mounding the groundwater in this area to cause flow outward in the manner and pathway currently taken by contaminated groundwater.

Two additional treatment trenches will be constructed to the east and south of the source area excavation using perforated pipe and sand and gravel backfill. Backfill for the infiltration gallery and trenches will be imported backfill material meeting the following requirements for Gravel Borrow:

• Aggregate for Gravel Borrow will consist of granular material, either naturally occurring or processed, and will meet the following requirements for grading and quality:

Sieve Size	Percent Passing
4″	99-100
2″	75-100
No. 4	50-80
No. 40	30 max.
No. 200	8 max.
Sand Equivalent	50 min.

 If wet weather construction is anticipated, then the amount of fines in the Gravel Borrow may be limited to 5 percent or less based on the fraction of the material passing a US Standard ¾-inch sieve. Imported fill soil will be certified by the commercial quarry supplier that it has been tested and the fill soil does not contain arsenic at concentrations greater than MTCA Method A cleanup levels or diesel- and oil-range hydrocarbons at concentrations greater than 200 mg/kg. Imported fill from other sites will be tested at a rate of one sample per 1,000 cubic yards to verify that the fill soil is not contaminated with arsenic or diesel- and oil-range hydrocarbons and meets the specified gradation requirements that will be provided in the construction plans, and will include provisions to ensure the imported fill is native source material and does not include concrete, asphalt, or other waste materials. Once the imported fill the excavations. The backfill will be placed in loose, horizontal lifts greater than 10 inches in thickness and compacted to at least 92 percent of the maximum dry density, except the upper 12 inches of subgrade will be compacted to a minimum of 95 percent of the maximum dry density, as determined by the ASTM International D1557 test procedure (modified Proctor).

The locations and conceptual details of the excavation area infiltration gallery and two additional treatment trenches are shown on Figure 7 and described below. The infiltration gallery in the source area will be created by installing two horizontal lengths of perforated pipe within the backfilled excavation. The Piping will be 3- or 4-inch-diameter, rigid high-density polyethylene or PVC, approximately 50 to 60 ft long and installed at the approximate locations shown on Figure 7. Pipe perforations will be oriented downward to minimize filling with sand.

Filter fabric will not be used for material separation between the piping and adjacent soil due to potential fouling by LNAPL and/or biological activity. The horizontal perforated pipe will be placed on top of 2 ft of fill placed in the bottom of the excavation to prevent the pipe from silting up with disturbed soil at the bottom of the excavation. Vertical risers for injection and cleanout will be installed at both ends of the horizontal perforated pipe using cleanout sweep tees. Risers will be contained within traffic-rated vaults at the surface to allow future access for monitoring and injection, while minimizing aboveground features. The top 3 ft of backfill around each riser will consist of cement-bentonite grout as a surface seal. Risers will be completed with female pipe thread adaptors and threaded plugs to facilitate connection to injection hoses. All connections and fittings will be solvent-welded.

The treatment trenches installed outside the source area will extend 1 to 2 ft below the water table to intersect the TPH smear zone. The two trenches will be located east and south of the infiltration gallery for focused treatment in those area. Each trench will be approximately 30 ft long and 3 ft wide. Backfill and perforated pipe installation will be as described above for the infiltration gallery. Risers will be installed at each end for injection and monitoring. Additional risers are included for LNAPL observation and recovery, which as discussed earlier, will be conducted prior to initiating bioremediation.

4.2.5.3 Bioremediation – Implementation Details

This section describes the reagent delivery approach and electron acceptor selection tailored to Sitespecific conditions. Site-specific considerations are:

- Generally low hydraulic conductivity (i.e., slow injection or infiltration rates)
- Alternating lenses of sand and silt/clay resulting in variable hydraulic conductivity and distribution of petroleum contamination
- A naturally reduced aquifer condition due to the depositional environment of soils in the shallow water-bearing zone at the Site.

Due to the low hydraulic conductivity anticipated in the finer silt or clay soils, infiltration is preferred at the Site instead of injection. Use of infiltration galleries and trenches allows for relatively quick injection of substrates to granular backfill, followed by slower infiltration to native soils. Through the use of galleries/trenches, the reagents can be introduced to the subsurface in large batches, resulting in water-level mounding within the gallery/trench that will drive outward distribution of reagents to the surrounding aquifer. Infiltration galleries/trenches also result in improved distribution of reagents to the layers intercepted by the gallery/trench.

The use of nitrate as an electron acceptor is preferred due to naturally anaerobic conditions at the Site. Shallow Site soils are typical of a marine depositional environment, as they are predominantly dredged marine sediments used in the 1930s and 1940s to create the uplands. The high concentrations of natural organic matter and reduced metals present in these anaerobic soils make oxygen an ineffective electron acceptor for TPH treatment, due to the substantial oxygen demand exerted by the natural soil condition. If oxygen was introduced at the Site, most of it would go to satisfy this natural demand instead of stimulating biodegradation of TPH.

Biodegradation of TPH occurs through microbially mediated reactions, whereby micro-organisms obtain energy by redox reactions. TPH is used as the electron donor together with various electron acceptors (oxygen, nitrate, manganese [IV], ferric iron, sulfate, and carbon dioxide) that occur naturally or can be added to stimulate treatment. These redox reactions can be compared to the process whereby humans obtain energy through consumption of food (electron donor) and oxygen (electron acceptor). Bacteria obtain the greatest energy yield by using oxygen as an acceptor, as it is highly oxidized and can be reduced easily and to a large extent. When oxygen is depleted, bacteria use the less oxidized electron acceptors in the following order: nitrate, manganese (IV), ferric iron, sulfate, and carbon dioxide. After oxygen, nitrate is the most readily used electron acceptor. The micro-organisms responsible for TPH biodegradation occur naturally in the aquifer.

Anaerobic biodegradation of TPH is the preferred approach (over aerobic biodegradation) for this Site, consistent with its usage at other cleanup sites with reduced aquifers (Wiedemeier et al. 1999). Although nitrate and sulfate can both be used as electron acceptors for anaerobic bioremediation of TPH (Cunningham et al. 2001), nitrate is typically a more effective acceptor and is preferred by aquifer bacteria, as it provides more energy than sulfate and is typically depleted in areas of TPH contamination. Nitrate also has various advantages over oxygen as an electron acceptor. Nitrate is a weaker oxidizing agent than oxygen, which means that demand for nitrate represented by natural aquifer organics and reduced metals is less than the demand for oxygen. As a result, nitrate has a

greater longevity than oxygen and a larger portion of the injected electron acceptor will be used for TPH degradation. Additionally, the solubility of nitrate is much greater than oxygen, which allows for a higher initial concentration of electron acceptor at the infiltration point, greater longevity, and a greater downgradient extent of treatment.

Although a drinking water maximum contaminant level (MCL) exists for nitrate (10 milligrams nitrateas-nitrogen per liter [mg N/L]), drinking water is not a beneficial use of shallow groundwater at the Site and, therefore, the MCL does not apply. As described in the RI/FS report, the highest beneficial use for Site groundwater is the discharge to the marine surface water of Blaine Harbor. There are no marine surface water criteria for nitrate based on the MTCA Cleanup Levels and Risk Calculation database (Ecology 2015; accessed August 7, 2017). It is anticipated that the sheetpile walls installed prior to bioremediation will increase the retention, allowing for utilization of the nitrate and limiting migration to surface water.

The following sections describe the conceptual plan for injection volumes, substrate types, substrate concentrations, and anticipated modifications for subsequent injections. Volume calculations and a table of substrate masses required for different nitrate concentrations are provided in Appendix D. Further details related to the injection and performance tracking/modifications will be provided in a bioremediation work plan, as part of the detailed construction plans after approval of this EDR.

Volume

The estimated initial injection volume (per injection event) is approximately 40,000 gallons, based on the desired distribution and estimated pore volumes for the large infiltration gallery and the two treatment trenches. The infiltration gallery injection volume (35,000 gallons) is based on an approximate area of 5,200 square ft and a desired 3-ft increase in the water level within the infiltration gallery backfill.³ A rise in water level within the infiltration gallery is desired to contact the high portion of the TPH smear zone and to provide a driving head to distribute injection fluid into the surrounding native soil. The treatment trench injection volume (1,600 gallons each) is based on trench dimensions of 3 ft wide by 30 ft long and a desired rise of 8 ft from the water table to just below ground surface; this rise in the water level is desired to maximize the injection volume distributed to the trench, to contact the high portion of the TPH smear zone, and to provide a driving head to distribute injection volume of 38,238 gallons is rounded up the 40,000 gallons. Volume calculations are provided in Appendix D, Table D-1.

³ For comparison, if the same 5,200-square-ft area was injected using a grid of injection wells on 15-ft centers (25 wells), the 35,000-gallon injection volume planned for the injection gallery would correspond to approximately 1,500 gallons per well. This is within the range of typical injection well volumes.

Reagent Concentrations

Ammonium nitrate, ammonium phosphate, and yeast extract will be mixed with clean tap water at the Site to create the injection solution. Ammonium nitrate provides the nitrate electron acceptor. Ammonium phosphate and yeast extract provide macro- and micro-nutrients for bacteria cell growth.

It is anticipated that the concentration of injected nitrate may range from 225 mg N/L to 10 times that concentration (2,250 mg N/L). This is an empirical design concentration based on engineering and implementation experience at other cleanup sites, where nitrate concentrations of 225 mg N/L to 1,800 mg N/L have been effectively used with a nitrate longevity of 4 to 12+ months. The amount of phosphate added to the injection solution is based on a nitrogen to phosphorus ratio of 10:1, an optimal nutrient ratio (Tchobanoglous et al. 2003). Yeast extract is provided at 1 pound (lb)/1,000 gallons of injection fluid to provide micro-nutrients. The required mass of these reagents for the range of anticipated nitrate concentrations is provided in Appendix D, Table D-2. Based on stoichiometry, it takes about 5 lbs of nitrate to degrade 1 lb of TPH/benzene, toluene, ethylbenzene, and xylenes (BTEX) if nitrate is fully used for TPH degradation; this stoichiometry is discussed further in Appendix D, Table D-3.

Multiple injections of nitrate are anticipated to complete treatment of TPH, as it is present in various forms, including NAPL, dissolved-aqueous phase, and adsorbed to soil particles. Reagent concentrations, injection frequency, and/or injection volume will likely be modified for subsequent injections to optimize treatment. Modifications would be based on observations during and after injection and on monitoring data indicating the distribution and longevity of injected nitrate. More concentrated reagent concentrations may be used in the injection trenches than the infiltration gallery due to freeboard volume limitations.

4.2.5.4 Extension of Sheetpile Bulkhead

The sheetpile bulkhead that was installed as an interim action may be extended to the north to reduce near-shore tidal exchange in the affected upland area and extend the residence time for the bioremediation solutions on an as-needed basis to be determined in coordination with Ecology, based on conditions observed while implementing the bioremediation program. The joints where the individual sheetpile sections connect will be sealed with a non-toxic interlock sealant that provides watertight connections between the individual sheets. The sealant will be applied to the joints prior to driving the sheets. The location of the bulkhead extension is shown on Figure 4, and the conceptual details in section-view are shown on Figure 5.

A geotechnical report was prepared in 2012 (LAI 2012a) to support the bulkhead design for the section of bulkhead constructed during the interim action. The report will provide basis for design considerations for the construction plans, and is provided in Appendix C for reference.

If needed, the new bulkhead wall will be constructed with steel PZC-13 section sheetpiling, driven to a minimum depth of 30 ft bgs. The design of the sheetpile bulkhead is based on a 10-ft exposed height on the waterward face of the bulkhead. While the height of the exposed face is currently less than 10 ft, the wall has been designed to be stable in the event that the riprap and fill shifts or is removed from the waterward face of the bulkhead at some point in the future. The bulkhead will be a cantilevered design and will not include a tieback system. The cantilevered bulkhead has been designed to support the full lateral loads from earth pressures, hydrostatic loads from retained groundwater, and vehicle loading from Sigurdson Avenue.

For sheetpile bulkhead installation, the bulkhead alignment landward of the existing timber bulkhead will be screening for the presence of utilities and subsurface obstructions by excavating a trench along the alignment a minimum of 5 ft wide by 3 ft deep prior to sheetpile installation. The excavation may be deeper and/or wider in some areas to verify conditions such as utilities or the existence (and removal) of tiebacks. The excavation would be in relatively shallow soil that is not anticipated to be contaminated. The excavated soil will be stockpiled for assessment and potentially used at the Site for backfill. The sheetpiles will then be vibrated into place along the shoreline just landward of the existing timber bulkhead. The top area around the sheetpile will be backfilled with controlled lifts of specified maximum thickness and minimum compacted density.

Prior to installation, two structures located in the planned alignment will require demolition, as discussed in Section 4.2.1. Procedures for the demolition of these structures will be included in the construction plans and specifications after approval of this EDR.

4.2.6 Compliance Monitoring

Compliance monitoring is a required element of any MTCA cleanup action. Compliance monitoring will be conducted in accordance with WAC 173-340-410 to confirm that cleanup standards have been achieved and to confirm the long-term effectiveness of cleanup actions at the Site. Detailed monitoring requirements will be developed with the detailed construction plans, after approval of this EDR, in a compliance monitoring plan (CMP). The CMP will specify the location, duration, and frequency of monitoring and the rationale for the termination of monitoring.

The three types of compliance monitoring to be conducted are:

- **Protection Monitoring** to confirm that human health and the environment are adequately protected during the construction period of the cleanup action
- **Performance Monitoring** to confirm that the cleanup action has attained cleanup standards or other performance standards
- **Confirmation Groundwater Monitoring** to confirm the long-term effectiveness of the cleanup action once cleanup standards and performance standards have been attained.

4.2.6.1 **Protection Monitoring**

The purpose of protection monitoring is to safeguard human health and worker safety during activities related to construction, operation, and maintenance of the cleanup action as addressed through the project health and safety plan (HASPs). The project HASPs address potential physical and chemical hazards associated with Site activities, consistent with the requirements of WAC 173-340-810. Anticipated potential physical hazards include exposure to hazardous building materials, working in proximity to heavy equipment, open excavations or trenches, and contaminated soil and/or water. Exposure to Site contaminants in the soil or groundwater could occur through various exposure pathways including direct contact, ingestion, and inhalation. The existing project HASP will be updated (if needed) for use by the engineering team during construction oversight and the selected construction contractor will be required to prepare and submit a HASP for use by their workers and subcontractors.

Environmental protection monitoring will be conducted as described in the CMP. This is anticipated to include dust monitoring, monitoring to ensure proper implementation of the stormwater pollution prevention plan (SWPPP), and monitoring best management practices (BMPs) that will be implemented to minimize and control stormwater runoff from contaminated soil during construction. During construction, a certified construction erosion and sediment control lead will monitor performance of the BMPs and recommend changes in approach or application, if required.

4.2.6.2 Construction Performance Monitoring

Performance monitoring will include verifying that the physical limits of the planned excavation are sufficient to remove source materials from the Site. No soil confirmation samples will be collected from the excavation bottom or sidewalls because the excavation is not intended to reduce IHS concentrations in soil to meet CLs. Rather, the excavation will remove most of the source material before bioremediation and MNA are used to clean up the remaining contamination in Site soil and groundwater.

Survey control points will be provided in the construction plans and specifications, which will be used by the contractor to guide excavation efforts and check that excavation is conducted as planned. A field engineer will observe construction and will work with the contractor to confirm adherence to the excavation plans.

Baseline and subsequent performance monitoring events will consist of collecting groundwater samples from wells located upgradient, within, and downgradient of the infiltration gallery and trenches. It is anticipated that after removal of the three monitoring wells that must be decommissioned because they are within the boundary of the excavation (MW-1, MW-2, and MW-3), the other seven groundwater monitoring wells will remain at the Site for monitoring conditions. Additional monitoring wells will also be installed. The actual locations of groundwater monitoring wells will be determined during remedial design and shown in the CMP.

Monitoring will begin with observations for LNAPL accumulation in groundwater monitoring wells and the LNAPL monitoring risers installed in the larger infiltration gallery and two treatment trenches. Recovery will be conducted if practicable as described in Section 4.2.4. Afterward, a baseline groundwater monitoring event will be conducted to establish IHS and nitrate concentrations for later comparison to the post-injection monitoring events. Post-injection monitoring is anticipated to occur on a quarterly basis during the first 2 years of active injections, transitioning to a semiannual frequency in the third year. The first post-injection event is anticipated to occur 1 to 2 months after injection. Monitoring frequency may be adjusted based on the monitoring results. Groundwater monitoring results will be evaluated for trends in contaminant and nitrate concentrations and to assess changes in aquifer redox conditions as contaminant mass is consumed. It is anticipated that samples collected during baseline and post-injection monitoring will be analyzed for TPH-G, TPH-D, benzene, total naphthalenes, nitrate, sulfate, and ferrous iron (by a field test kit), although adjustments to the suite of analytical parameters may be made over time in consultation with Ecology based on the analytical results.

4.2.6.3 Monitored Natural Attenuation

The cleanup action may include a period of MNA after completing the bioremediation program, if needed, as a final polishing step to allow for IHS concentrations to be reduced to below cleanup standards. It is the intent of the cleanup action to use active cleanup measures to minimize the restoration timeframe to the greatest degree practicable. MNA would be implemented after bioremediation efforts have successfully reduced the concentrations of contaminants to the degree that the restoration timeframe through MNA would be considered reasonable in accordance with the CAP and MTCA guidelines. If the evaluation of MNA data indicates additional active remedial action is required to achieve cleanup standards within a reasonable restoration timeframe, further bioremediation or hotspot removal through excavation could be implemented.

The goal of MNA is to allow for natural processes to reduce contaminants in groundwater while monitoring the Site boundary and exposure pathways to ensure that the remaining contamination does not pose a risk to human health or the environment. This goal will be accomplished in two ways:

- Monitoring of the natural attenuation of IHS concentrations in groundwater at the Site until they are below the CLs established for groundwater
- Ongoing evaluation of whether MNA will achieve the cleanup goal in a reasonable restoration timeframe (or if contingent actions are necessary).

Trends in groundwater chemical concentrations and geochemical parameters will be used to evaluate MNA effectiveness.
5.0 ENGINEERING BASIS FOR DESIGN

The following sections present the engineering basis and design rationale for the cleanup action described herein. The discussion below provides typical design criteria, assumptions used in developing the preliminary design details, MTCA-required design considerations, and the rationale for how and why the cleanup action will achieve the remedial action objectives (RAOs) and meet cleanup standards in accordance with MTCA requirements.

5.1 General Design Criteria

The general design criteria for this cleanup action will include the following, some of which cannot be further developed until detailed construction plans are prepared:

- Cleanup standards established in the CAP (Section 2.3)
- Erosion and sediment control regulations and requirements
- Soil sloping and stability for the temporary excavations (Appendix C)
- Fill material physical and chemical characteristics appropriate for future Site use
- Subtitle D municipal solid waste landfill waste acceptance criteria
- Finish grade, surfacing, and/or landscape specifications
- Applicable permitting requirements (Section 4.2.1.1).

5.2 MTCA-Required Design Considerations

This section describes Site-specific design considerations required in WAC 173-340-400(4) pertinent to the design, construction, and operation of the cleanup action. Specifically, this section addresses the relationship between the proposed cleanup action and the Site geographic features, subsurface conditions, existing structures, and current and future Site operations.

5.2.1 Facility Characteristics Affecting the Cleanup Action

As shown on Figure 2, aside from the gravel surfacing near the ASTs, most of the surface is asphaltpaved or covered with slab-on-grade industrial buildings. Utilities in the vicinity of the Site cleanup will require decommissioning prior to other Site work. These include fuel pipelines on the west side of the Site, which transferred fuel from the ASTs to the fueling dock, and both underground and aboveground power lines on the east side of the Site, which service the existing buildings. The utility lines will be deactivated and sealed within the proposed excavation and temporary shoring areas (extents shown on Figure 6). The portion of utilities within the excavation area will be removed as a part of this cleanup action.

The presence of Sigurdson Avenue and the high density of subsurface utilities beneath the road will affect the source area excavation. Some contamination below the road would have been removed as part of the source area excavation, but will remain in place due to the impracticality of excavation.

The utilities are active and service many nearby buildings and activities. After source area removal, the contamination beneath the roadway will be the highest levels remaining on Site, but it is anticipated that bioremediation will be effective to achieve CLs in this area.

The paving, flooring, and foundations will be demolished and removed as part of the cleanup action. The demolition material will be recycled or disposed of at permitted waste handling facilities, as appropriate. The demolition excavations will be backfilled with non-contaminated engineered fill soil that is imported to the Site or excavated from non-contaminated areas as part of the cleanup excavation. The general public associated with these nearby access points will be protected from the Site cleanup activities by perimeter fencing, secured access gates, and traffic controls.

5.2.2 Controls to Prevent Hazardous Material Releases

The following controls will be implemented to prevent releases of hazardous materials during excavation and handling of contaminated soils:

- Installation and maintenance of temporary erosion and sediment control structures and implementation of BMPs. These controls and BMPs include wetting of soil, as necessary, during excavation to control dust; silt fencing; tire washing of haul trucks; applying crushed rock over exposed soil; and stormwater drainage to infiltration areas.
- Properly covering and securing loads during hauling operations.

In addition, the shoreline will be protected from erosion by the installation of a sealed sheetpile bulkhead.

5.2.3 Flooding

The Site is located between Semiahmoo Bay and Drayton Harbor and is subject to ocean tide fluctuations that are below the finished grades of the Site. Flooding is, therefore, unlikely to impact the Site unless an extreme storm event impacts the Site. Based on the proposed depth of excavation, it is anticipated that stormwater runoff from even high-intensity events during the cleanup action will be completely contained.

5.2.4 Seismic Activity

The Site is located in a seismically active zone. However, the proposed excavation will be generally less than 12 ft in depth and is not anticipated to be a hazard in the event of an earthquake. The potential for hazard is lowered by removing structures prior to the cleanup action, excavation shoring, and sloping the excavation sidewalls to a safe conditions.

5.2.5 **Temperature Extremes**

The cleanup action consists of excavation and backfill in the generally mild climate of the Pacific Northwest. Higher temperatures (i.e., above 80°F) may affect the health and safety of the construction workers; therefore, a Site-specific health and safety plan (HASP; discussed in Section 6.4)

will be prepared by the contractor that will include provisions to address hydration and workers keeping cool within the confines of the Site. Cold temperatures will also impact the safety of the workers and will also be addressed in the contractor's HASP. Cold weather will affect backfilling of the excavations; the placement of backfill will not be conducted while the temperature is below 35°F to avoid placing frozen soil.

5.2.6 Existing and Future Site Uses

As described in Section 1, the Site and surrounding areas support the fishing and boating industries. Additionally, a retail furniture and appliance store was located on the Site. In preparation for this cleanup, the Site has been vacated and the existing buildings will be demolished and removed. After the cleanup action, future Site uses may include construction of commercial buildings, parking areas; roadways; public access; marina access; and associated utilities.

5.2.7 Local Planning and Development Issues

The Site is zoned for commercial use and there are no known local development issues that would prevent or impact the proposed cleanup action.

5.2.8 Public Access

The working areas of the Site will generally be closed to public access during the cleanup construction period. Traffic may be routed to avoid Sigurdson Avenue during portions of the cleanup, if an acceptable alternative route can be made east of the furniture retail building. Construction plans and specifications will ensure that the cleanup activities can be staged and implemented in a manner that maintains ingress and egress for local businesses and maintains safe distances from the excavation.

5.2.9 Future Sea Level Rise Considerations

Site cleanup activities will not change the existing grade or elevation of the Site. Based on the small size of the upland area, which is almost entirely surrounded by marine surface water, addressing sea level rise at the shoreline of the Site would be ineffective at preventing overtopping elsewhere, if it were to occur. Future sea level rise mitigation would require consideration during property redevelopment in a comprehensive manner, which is outside the scope of this EDR. Further, it is not anticipated that contamination will be left in place after the cleanup action is complete, so sea level rise is not a consideration for achieving cleanup standards.

5.2.10 Contingency Beach and Shellfish Bed Closure

No in-water work will be conducted as part of the cleanup action and no beaches or shellfish beds are in the Site vicinity. No closures are in consideration.

5.3 Efficacy of the Cleanup Action

Excavation of the highly contaminated soil in the source area is a rapid and efficient method to immediately reduce Site contamination and risks of exposure or migration. Soil excavation will reduce the risks posed to human health and the environment by removing potential exposure pathways to human and environmental receptors. The source area excavation facilitates LNAPL removal while the excavation is open, and NAPL monitoring/recovery wells will be used to observe for and remove additional NAPL if it is present.

Surface containment will be constructed to prevent exposure to residual contamination left in place after the source area removal until bioremediation has achieved cleanup standards. Anaerobic bioremediation is a proven effective approach to reducing concentrations of TPH contamination.

Wasserman et al. (2005) injected a nitrate solution for treatment of No. 2 fuel oil contamination, and within approximately 1 year after the initial treatment, soil and groundwater contaminant concentrations were reduced by 50 to 60 percent. Nitrate injection has been used extensively at Co-Op fueling sites in Canada (Campbell et al. 2009). Additionally, LAI has successfully used nitrate injection for TPH remediation at five other sites in Washington State, including two marine shoreline sites.

6.0 **CONSTRUCTION REQUIREMENTS**

The following section provides a description of the construction documents that will be prepared for the upland cleanup action, the quality assurance and control procedures that will be implemented to monitor and document the implementation of the cleanup action, the procedures that will be implemented to prevent releases of hazardous substances during construction, and the health and safety requirements that will be applied during implementation of the cleanup action.

6.1 Construction Drawings and Specifications

Construction plans and specifications will be prepared to develop details of the cleanup actions to be performed after approval of this EDR. The construction plans and specifications will be prepared in conformance with currently accepted engineering practices and WAC 173-340-400 (4)(b), and provide:

- A general description of the project that details the cleanup action, including work to be done, a summary of Site environmental conditions, a summary of design criteria, an existing facility map, adequate Site surveying, and a copy of permits and approvals
- Detailed plans and specifications necessary for construction, construction materials storage, construction waste storage and management, utility locations within cleanup areas, surface drainage, materials, backfill, and change in grades
- A description of construction impact controls (including dust, stormwater, traffic, and noise)
- Construction documentation including specific quality control tests such as soil density/ in-place compaction, moisture content, material gradation, subgrade strength, depth measurements, frequency of tests, and acceptable results.

6.2 Construction Quality Control/Quality Assurance

Day-to-day construction quality control (CQC) will be performed by the contractor, consistent with the requirements of the construction contract specifications for the cleanup action. The Port will have a construction quality assurance (CQA) representative on Site during construction to confirm that the work is being performed in accordance with the intent of the plans and specifications. CQC will include the necessary elements to ensure that the provisions of the contaminated materials handling plan are being followed. In accordance with WAC 173 340 400(7)(b), all aspects of construction will be performed under the supervision of a professional engineer registered in the State of Washington or a qualified technician under the direct supervision of the engineer.

A CQA plan is being prepared in conjunction with the construction plans and specifications. The plan includes the following monitoring parameters:

- Adequacy of construction submittals
- General construction methods and equipment
- Field engineering and survey methods
- Fill gradation, quality, and consistency

- Fill placement and compaction
- Suitability, quality, and installation of structural elements
- Stormwater runoff and erosion control measures
- Decontamination procedures
- Traffic control plan
- Contractor quality control methods and documentation
- As-built dimensions of completed work.

Specific quantitative measures and performance requirements have been established for each of the above-noted CQC/CQA parameters and will be incorporated into the construction specifications and the CQA plan for the cleanup action.

6.3 Control of Hazardous Materials, Accidental Discharges, and Stormwater

Prior to building demolition at the Site, the asbestos-containing material (ACM), mercury switchcontaining thermostats, and fluorescent light tubes identified during the hazardous building materials Survey (HBMS; Appendix C) will be removed and properly disposed of at an offsite disposal facility prior to demolition in accordance with all appropriate federal, state, and local regulations. Lead exposure hazards will be controlled by misting the structures during demolition to mitigate dust impacts, and implementing BMPs to prevent migration of lead dust. Additional lead worker exposure and decontamination controls will be described in the construction plans and specifications package to be implemented if monitoring during implementation indicates that workers will be exposed to lead at concentrations above the permissible exposure limit (PEL).

Procedures to control and, as appropriate, respond to spills from construction equipment and fueling operations will be incorporated into the construction plans and specifications. During Site cleanup, the materials most likely to be spilled include equipment fuel and oil, or contaminated soil. Additionally, stormwater runoff has the potential to convey water and soil off the Site. The contractor will prepare construction, equipment decontamination, and stormwater management plans in accordance with project- and Site-specific requirements set forth in the plans and specifications that adequately address environmental protection measures. The contractor will be required to perform work involving the handling of the above-noted materials in accordance with these plans. These plans will be subject to review and comment by the Port's CQA representative prior to initiating the work.

The contractor's project construction plan will describe the overall sequence and construction methods that will be used to complete the cleanup action. The plan will include detailed procedures for controlling, collecting, handling, and disposing of residual contaminated soil and debris, and any liquids generated during disposal operations. The equipment decontamination plan will provide design details for the contractor's equipment decontamination pad, including the pad dimensions;

construction materials; and water collection, conveyance, and treatment systems. The contractor's stormwater management plan will provide construction details and operation procedures for collection, conveyance, and treatment and disposal of stormwater runoff, and for erosion and sediment control measures, as required to ensure that materials are properly managed and maintained within the Site boundary. This plan will also address procedures for handling and storage of hazardous materials used for construction purposes (e.g., fuel, oil, etc.), and for prevention and, as appropriate, response to hazardous material spills or accidental discharges.

6.4 Health and Safety

Health and safety procedures that will be followed during the cleanup action are provided in this section.

6.4.1 Health and Safety for Demolition

Prior to demolition, the contractor must have an adequate HASP for properly trained and equipped personnel to remove ACM, lead paint and other hazardous building materials from the Site including but not limited to:

- Abatement of popcorn ceiling tiles, which will be Class I asbestos work.
- Abatement of the non-friable floor tiles, gaskets, and fire door, which will be Class II asbestos work.
- Exposure to lead. It is the employer's responsibility to ensure that work practices are in accordance with the Washington State Department of Labor and Industries' lead in construction rule (WAC 296-155-176). A Lead Handling specification will be included in the construction plans and specifications that will describe requirements for worker protection should monitoring during implementation indicate that workers will be exposed at concentrations above the PEL for lead. The contractor will also need to restrict access to the Site and control dust during demolition to prevent exposure to the public and/or migration of paint-chip waste into Site stormwater.
- Management of Universal Waste including light tubes, which must be packaged and disposed of in accordance with WAC 173-303-573(5).

6.4.2 Health and Safety During Cleanup Action

The following design features will be implemented as part of the cleanup action to ensure the safety of Site workers and the public:

- Safety Fences Temporary security fencing will be installed around the Site to allow unrestricted access to Site cleanup personnel while maintaining a secure perimeter around the Site. A detailed temporary fencing diagram will be provided on the construction plans. Additionally, safety fencing will be installed, as necessary, around open excavations to prevent unauthorized entry.
- Load Covering All loads of excavated soil will be properly secured and covered to prevent release and exposure of contaminated materials during hauling operations.

- Personal and Perimeter Air Monitoring Personal and perimeter air/dust monitoring will be conducted until there are sufficient data to indicate that there are no significant risks to Site workers or the public.
- Excavation Safety— Any areas of the excavation that exceed 4 ft in depth will be sloped or benched to reduce the potential for sidewall collapse. The LAI project-specific HASP will be prepared and provided under separate cover.
- A HASP will also be prepared by the contractor for use by their workers before beginning work on the Site. The contractor's HASP will be required to be at least as protective as LAI's HASP. Each HASP will be required to be at least as protective as the existing Site-specific HASP (LAI 2012b) used for previous Site investigation activities, and will satisfy the requirements of the Port; Ecology (per WAC 173-340 810); the Occupational Safety and Health Act of 1970 (29 USC. Sec. 651 et seq.); and the Washington Industrial Safety and Health Act (Chapters 296-24, 296-62, and 296-155 WAC). All workers at the Site will be required to read and sign the applicable HASP. A health and safety meeting will be conducted with the contractor, subcontractors, construction testing personnel, and appropriate Port employees before starting work at the Site.

6.4.3 Long-Term Health and Safety

Contaminated material will be excavated and removed from the Site and the excavations backfilled with imported clean soil. Residual contaminated soil contained on Site following completion of the excavation will be addressed by bioremediation. Therefore, the Site will not pose a threat to future long-term workers, the public, or other people accessing the Site.

6.5 **Construction Completion Report**

Upon completion of finish grading activities, the Port will prepare and submit a construction completion report for the upland cleanup in accordance with WAC 173-400 (6)(b). The construction completion report will include:

- A statement that the construction has been performed under the oversight of a professional engineer in the State of Washington or by qualified technicians under their direct supervision.
- A narrative describing the aspects of the work performed including construction techniques and materials used, items installed, and tests and measurements performed. The narrative will be supplemented with daily reports and photographs in the appendices.
- Results of the compliance monitoring (per Section 6.0) documenting that the contaminated soil has been removed, with testing results and locations shown in the appendices.
- As-built drawings documenting the extent of excavation and grading performed at the Site, including the following details:
 - Existing Site grades and locations and elevations of utility vaults, surface monuments, catch basins and manholes, and other structures in the vicinity of the work
 - Excavation elevations
 - Backfill material types and grades

- Locations of existing utilities and locations and elevations of all utility repairs and replacements
- Field changes of dimensions and details.
- A statement from the engineer, based on testing results and inspections, as to whether the cleanup action has been constructed in substantial compliance with the plans and specifications and related documents.

7.0 OPERATION AND MAINTENANCE OF THE CLEANUP ACTION

It is anticipated that the cleanup action will achieve the cleanup standards and that institutional controls will not be required following completion of the cleanup action.

If the restoration timeframe is longer than estimated, institutional controls will be implemented to provide the following protections until the Site is restored:

- Require maintenance of the Site's pavement and gravel cap
- Prevent the use of Site groundwater for drinking water
- Ensure the proper management of excavated soil or groundwater and appropriate worker safety associated with any future intrusive activities through implementation of a soil and groundwater management plan until cleanup standards are achieved in accordance with WAC 173-340-440.

If the cleanup action requires more time than currently estimated, institutional controls, potentially including a restrictive covenant, will be implemented to ensure that the integrity of the capping system and other cleanup equipment is maintained to prevent contact with contaminated media, protect the integrity of the cleanup action, and prevent the use of Site groundwater as a drinking water source until the Site cleanup standards are achieved.

8.0 USE OF THIS REPORT

This EDR has been prepared for the exclusive use of the Port of Bellingham and the Washington State Department of Ecology for specific application to the planned remedial action at the Blaine Marina, Inc. Site in Blaine Washington. Any reuse of information, conclusions, and recommendations provided herein for extensions of the project or for any other project, without review and authorization by LAI, shall be at the user's sole risk. LAI warrants that within the limitations of scope, schedule, and budget, our services have been provided in a manner consistent with that level of care and skill ordinarily exercised by members of the profession currently practicing in the same locality under similar conditions as this project. We make no other warranty, either express or implied.

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LANDAU Associates		Engineering Design Report Blaine Marina, Inc. Site Blaine, Washington	Site Plan	Figure 2





	sources: wilson Engineering topograph	Sources: Wilson Engineering topographic survey, 4/26/17; Wilson Engineering topographic survey, 11/02/11	
Landau Associates	Engineering Design Report Blaine Marina, Inc. Site Blaine, Washington	Site Preparation Plan	Figure 4









	Sources: Wilson Engineering topograp	hic survey, 4/26/17; Wilson Engineering topographic survey, 1	1/02/11
LANDAU Associates	Engineering Design Report Blaine Marina, Inc. Site Blaine, Washington	Excavation Conceptual Cross Sections	Figure 8

Table 1

Site Cleanup Levels

Engineering Design Report

Blaine Marina, Inc. Site – Blaine, Washington

IHS	Unsaturated Soil Cleanup Level ^a (mg/kg)	Saturated Soil Cleanup Level ^a (mg/kg)	Groundwater Cleanup Level ^b (mg/L)	Soil Vapor (µg/m³)
1,3-Butadiene	c	c		2.8
Benzene	0.014	0.005	0.0024	11
Ethylbenzene	18	1		
Total Xylenes	9.100	0.052		
TPH-D	2,000	2,000	0.500	
TPH-G	30 ^d	30 ^d	0.800	
Total Naphthalenes	2.30	0.12	0.083	

Notes:

^a Cleanup level based on lowest soil criteria corrected for practical quantitation limit (PQL) and background.

^b Cleanup level based on lowest Water Quality Standard or PQL, unless noted otherwise.

^c -- = Not applicable because constituent is not an indicator hazardous substance for the medium.

^d MTCA Method A cleanup level is 100 mg/kg if benzene is not present and the total of ethylbenzene, toluene, and xylenes is less than 1% of the gasoline mixture; otherwise the cleanup level is 30 mg/kg.

Abbreviations and Acronyms:

IHS = indicator hazardous substance

- TPH-D = diesel-range total petroleum hydrocarbons
- TPH-G = gasoline-range total petroleum hydrocarbons

 $\mu g/m^3$ = micrograms per cubic meter

mg/kg = milligrams per kilogram

mg/L = milligrams per liter

APPENDIX A

Pre-Remedial Design Investigation Data Report

Pre-Remedial Design Investigation Data Report Blaine Marina, Inc. Site Blaine, Washington

November 6, 2017

Prepared for

Port of Bellingham Bellingham, Washington



130 2nd Avenue South Edmonds, WA 98020 (425) 778-0907

Pre-Remedial Design Investigation Data Report Blaine Marina, Inc. Site Blaine, Washington

This document was prepared by, or under the direct supervision of, the technical professionals noted below.

^UPrimary Author

Evelyn H. Ives, PE

Jeremy M. Davis, PE

Document reviewed by:

Document prepared by:

Quality Reviewer

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<u>Attachment</u>	<u>Title</u>
1	Logs of Explorations

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LIST OF ABBREVIATIONS AND ACRONYMS

μg/L	micrograms per liter
AST	aboveground storage tank
bgs	below ground surface
EPA	US Environmental Protection Agency
ft	feet
LNAPL	light non-aqueous phase liquid
mg/kg	milligrams per kilogram
mg/L	milligrams per liter
PID	photoionization detector
Site	Blaine Marina Inc. Site
ТРН	total petroleum hydrocarbons
трн-д	diesel-range total petroleum hydrocarbons
TPH-G	gasoline-range total petroleum hydrocarbons
VOC	volatile organic compound

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INTRODUCTION

This data report presents the results from soil and groundwater pre-remedial design investigations conducted at the Blaine Marina Inc. Site (Site) in Blaine, Washington (Figure 1). The investigation was completed in accordance with the Pre-Remedial Design Investigation Work Plan (Work Plan; LAI 2017) to collect the additional information needed to complete the design of the final cleanup action selected for the Site, as outlined in the Cleanup Action Plan (Ecology 2016).

The pre-remedial design investigation included the following activities:

- Land Surveying:
 - Significant Site features (buildings, permanent equipment, etc.)
 - Surface elevations
 - Overhead and underground utilities
- Evaluate Building Conditions:
 - Visually inspect general building conditions
 - Conduct a hazardous building materials survey
- Additional Soil Investigation
 - Conduct field screening for contamination by advancing borings and test pits to evaluate core and sidewall soil samples
 - Collect and analyze additional subsurface soil samples to supplement the Site characterization data
- Additional Groundwater Investigation
 - Collect and analyze groundwater samples from existing monitoring wells and groundwater grab-samples from direct-push borings.

During initial investigation activities, unexpected light non-aqueous phase liquid (LNAPL) was encountered in two groundwater monitoring wells and, as a result, additional activities were added to the scope of the Work Plan. These activities were:

- Evaluate LNAPL observed in monitoring well MW-9 by conducting a recoverability test
- Evaluate soil conditions near MW-9 by excavating a test pit for observation.

SOIL INVESTIGATION RESULTS

Additional subsurface explorations were conducted to better characterize soil conditions sufficiently to determine the extent of the highly contaminated soil (source material) to be removed during the cleanup action. Data from these explorations will be used to delineate the lateral boundary for excavation beneath the Furniture and Appliance Retail store and to the east of the aboveground storage tanks (ASTs) beneath the storage buildings. Soil samples were also collected as near as possible to the existing bulkhead, to determine if LNAPL is present in this area.

Field-screening techniques were used to assess the degree of LNAPL presence and 24 soil samples were submitted for laboratory analysis of total petroleum hydrocarbons (TPH) by Methods NWTPH-Dx and NWTPH-G. Soil results were compared to the applicable cleanup levels and are provided in Table 1.

A total of 24 borings were advanced (BMI-GP-23 through BMI-GP-33 and BMI-GP-35 through BMI-GP-47) to a depth of 12 to 16 feet (ft) below ground surface (bgs) in order to observe conditions at least 3 ft below the groundwater table at each location. Logs of explorations containing soil classifications and notes of observable signs of contamination are provided in Attachment 1. Petroleum hydrocarbon oil sheen, possibly indicative of nearby LNAPL, was observed at nine of the boring locations. The greatest indications of contamination were located near the ASTs. Soil samples collected from near the bulkhead contained no signs of contamination. Samples for laboratory analysis were collected from depth intervals within 2 ft above or below the groundwater table.

Analytical results for locations that had one or more cleanup level exceedances are shown on Figure 3. Soil samples from nine locations contained concentrations of diesel-range TPH (TPH-D) above the cleanup level of 2,000 milligrams per kilogram (mg/kg). And soil samples from 16 locations contained concentrations of TPH-G above the cleanup level of 30 mg/kg. Many of the gasoline-range TPH (TPH-G) data point exceedances were also J-flagged, indicating that the laboratory had positively identified the analyte, but the associated numerical value is an approximate concentration. The highest TPH-D and TPH-G concentrations in soil were detected in the sample from BMI-GP-24, located near the northeast corner of the Furniture and Appliance Retail store footprint. The cleanup excavation boundary will be expanded to include this area as discussed in the Engineering Design Report.

GROUNDWATER INVESTIGATION RESULTS

Groundwater samples were collected from five of the direct-push borings (BMI-GP-27, BMI-GP-30, and BMI-GP-38 through BMI-GP-40) and samples were collected from seven of the existing groundwater monitoring wells. Groundwater elevations and the amount of LNAPL, if present, were measured at the time of sampling.

Prior to groundwater sampling from the existing monitoring wells, each well was inspected for integrity and the need for well development. All of the existing wells appeared to be in good condition. During measurement of groundwater elevations, LNAPL was observed in five of the existing wells. Groundwater samples were not collected from wells where LNAPL was present, except from MW-9. Because LNAPL had not been observed at MW-9 before, a sample of the LNAPL was collected and analyzed for TPH by Method NWTPH-HCID.

All other groundwater samples were submitted for laboratory analysis for TPH by Methods NWTPH-G and NWTPH-Dx; for benzene, toluene, ethylbenzene, and xylenes by US Environmental Protection Agency (EPA) Method 8021, and for naphthalenes by EPA Method 8270D. Groundwater samples were also analyzed for conventional geochemical indicator parameters to support the bioremediation design evaluation; including manganese by EPA Method 620, and nitrate and sulfate by EPA Method 300.

Groundwater results are provided and compared to applicable cleanup levels in Table 2. Data from locations where concentrations exceeded cleanup levels are shown on Figure 3. Six of the locations contained TPH-D concentrations that exceeded the cleanup level of 500 micrograms per liter (μ g/L). Oil-range TPH was not detected at concentrations greater than the laboratory reporting limit, except in the grab sample from boring BMI-GP-27, which is located near the northwest corner of the Furniture and Appliance Retail store footprint. TPH-G was detected in six of the groundwater samples, but exceeded the 800 μ g/L cleanup level only at monitoring well MW-7.

Benzene was not detected at concentrations greater than the laboratory reporting limit in 8 of the groundwater samples. Detections of benzene did occur in samples from MW-6, BMI-GP-38, and BMI-GP-39, but all concentrations were below the cleanup level. Total naphthalene was detected in six of the samples and concentrations exceeded cleanup levels at MW-7, BMI-GP-38, and BMI-GP-40.

Geochemical indicator parameters were consistent with previous remedial investigation measurements, continuing to support that anaerobic biological activity is occurring but could possibly be enhanced due to rate-limiting low concentrations of nitrate. Dissolved oxygen concentrations were typically below 3 milligrams per liter (mg/L), except at locations near the bulkhead, which appear to be tidally influenced. Nitrate concentrations ranged from concentrations not detected above 0.15 to 14 mg/L as nitrogen. These concentrations are relatively low and could indicate that nitrate is used very quickly in the aquifer. Sulfate concentrations ranged from non-detect (below 0.26 mg/L) to 1,700 mg/L, which indicates sulfate-reducing bacteria are not readily using it as an electron acceptor. Therefore, sulfate will not be added to the initial bioremediation injection fluid.

Results from the LNAPL sample collected at MW-9 indicate that the product contains petroleum hydrocarbons in all three ranges (gasoline, diesel, and oil). LNAPL had never previously been encountered at this location, and its presence warranted further investigation, which is detailed in the next section.

ADDITIONAL LNAPL INVESTIGATION RESULTS

As part of the groundwater investigation, field personnel measured depth to groundwater and LNAPL thickness on top of groundwater, if it was present. LNAPL was noted as present in the areas it was previously detected, but also at MW-10 and MW-9, where it has not been observed in the past. At MW-10, it was present with a thickness of about 0.25 ft, and at MW-9, it was present with a thickness of 2.4 ft.

To address these unexpected conditions, additional investigations were conducted near MW-9. LNAPL was further investigated by conducting a recoverability test at MW-9 using the procedures outlined in the Remedial Investigation Work Plan Addendum (LAI 2013). In addition, test pits were dug upgradient and downgradient of MW-9 to evaluate whether the source of LNAPL is located in soil near MW-9.

Recoverability Test

The recoverability test included removing the LNAPL from MW-9 and monitoring its recovery, then using a spreadsheet tool to determine LNAPL transmissivity. The recovery data can be used in this manner to evaluate if hydraulic recovery of the LNAPL is feasible.

The test was conducted on May 18, 2017. The LNAPL thickness at the start of the test was 2.81 ft. The LNAPL was removed (by pump) and recovery was observed over the course of 6 hours. During this time, the LNAPL did not fully recover to its original thickness. The final thickness was 1.03 ft. The poor recovery was insufficient to calculate an LNAPL transmissivity. It is likely that the observed LNAPL recovery was recharged from the well sandpack, and that LNAPL transmissivity from the surrounding aquifer is very low. A follow-up measurement was collected after 1 month (June 19, 2017) at which time the thickness was 1.13 ft, supporting the conclusion that no recoverable free product is present.

Test Pits

Five test pits were dug on June 19, 2017 at the locations shown on Figure 4 near MW-9. The test pits were each approximately 8 ft long, 3.5 ft wide, and 8.5 to 12 ft deep, depending on the depth to groundwater. Sloughing of side walls at depths below the groundwater table prevented the test pits from extending to 12 ft bgs at all locations. Field personnel visually observed the test pit sidewalls and groundwater seepage for the presence of LNAPL. The excavated soil was stockpiled on plastic sheeting on Site and returned to the test pit upon completion of the observation. Soil was returned to the test pit on the same day it was excavated, in the order it was removed so it would reside in approximately the same location after the test pit exploration was complete. Logs of each test pit, containing soil classifications and notes of observable signs of contamination, are provided in Attachment 1.

Soil from sidewalls were collected and tested using a photoionization detector (PID) to screen for volatile organic compounds (VOCs). The highest PID readings were measured in test pits TP-2, TP-3,

and TP-5, while readings in test pits to the east, in TP-1 and TP-4, had little to no VOC hits. PID results and observations of contamination are shown on Figure 4. A heavy sheen and LNAPL were not observed in any of the test pits. A slight sheen was observed in groundwater seepage from test pit TP-2 on the west wall (at 12 ft bgs), but not on the east wall. Based on these findings, it appears that there is not a significant amount of LNAPL in the soil formation surrounding MW-9.

The rate of groundwater seepage in all test pits was observed as "slow."

In addition to evaluating environmental conditions, field personnel observed the test-pit sidewalls for stability to note conditions that will be encountered during remedial excavation. The stability of sidewalls was compromised at depths greater than approximately 8 ft bgs, because of saturated soil. These conditions were considered during design of the LNAPL excavation for Site remediation.

USE OF THIS REPORT

This Pre-Remedial Design Investigation Data Report has been prepared for the exclusive use of the Port of Bellingham and its representatives for specific application to the Blaine Marina, Inc. project. No other party is entitled to rely on the information, conclusions, and recommendations included in this document without the express written consent of LAI. Further, the reuse of information, conclusions, and recommendations provided herein for extensions of the project or for any other project, without review and authorization by LAI, shall be at the user's sole risk. LAI warrants that within the limitations of scope, schedule, and budget, our services have been provided in a manner consistent with that level of care and skill ordinarily exercised by members of the profession currently practicing in the same locality under similar conditions as this project. We make no other warranty, either express or implied.
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REFERENCES

- Ecology. 2016. Cleanup Action Plan, Blaine Marina Inc. Site, Blaine, Washington. Washington State Department of Ecology. August 11.
- LAI. 2013. Technical Memorandum: Remedial Investigation Work Plan Addendum, Blaine Marina Inc. Site, Blaine, Washington. Landau Associates, Inc. March 18.
- LAI. 2017. Pre-Remedial Design Investigation Work Plan, Blaine Marina Inc. Site, Blaine, Washington. Landau Associates, Inc. March 14.



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	Pre-Remedial Design Soil Sample Location Pre-Remedial Design Soil Sample and Groundwater Grab Sample Location Groundwater Monitoring Well Location Previous Soil Sample and Groundwater Grab Sample Location Previous Soil Sample Location Previous Geotechnical Boring Location Pilot LNAPL Recovery Well MHHW - 9.5 ft Above MLLW Gravel Area Riprap Slope Test Pit Location Site Boundary	— F- — IR- — F- —G- —V-	Fire Booster Line Irrigation Line Fuel Line Old Fuel Line Vault Line Power Line HTCI	<u>Abbreviations</u> LNAPL = Light Non-Aqueous MHHW = Mean Higher High MLLW = Mean Lower Low W	Water Nater 0	20 Scale in Feet	40
4	Notes 1. Black and white reproduction of this color original may reduce its effectiveness and lead to incorrect interpretation.	Source:	: Wilson Engineering 2011, Blaine Marina, Inc. Site Blaine Harbor Blaine, Washington	Site Plan	ker and Associates, Ir with Pre-Remed tion Sampling	dial Design	Figure 2



Legend

- \odot Pre-Remedial Design Soil Sample Location
- Pre-Remedial Design Soil Sample and Groundwater Grab Sample Location

North

Project

- \oplus Groundwater Monitoring Well Location
- Previous Soil Sample and Groundwater Grab Sample Location
- ۲ Previous Soil Sample Location
- \bullet Previous Geotechnical Boring Location
- R Pilot LNAPL Recovery Well

..... MHHW - 9.5 ft Above MLLW

Gravel Area

Riprap Slope

- Test Pit Location
- Site Boundary

LANDAU

ASSOCIATES

- 0
- Soil/Groundwater sample results are below cleanup levels

Notes

- 1. Groundwater results are shown in μ g/L. Soil results are shown in mg/kg.
- 2. Data shown are those locations with one or more exceedance of screening levels for TPH-D and/or TPH-G. All Pre-Remediation Design Investigation results are shown in Tables 1 and 2.
- 3. Data highlighted in yellow indicate a screening level exceedance.
- 4. "J" flagged data indicate the analyte was positively identified, but the associated numerical value is an approximate concentration
- 5. Black and white reproduction of this color original may reduce its effectiveness and lead to incorrect interpretation.

Abbreviations

- LNAPL = Light Non-Aqueous Phase Liquid
- MHHW = Mean Higher High Water
- MLLW = Mean Lower Low Water
- TPH-D = Total Petroleum Hydrocarbons; Diesel Range
- TPH-G = Total Petroleum Hydrocarbons; Gasoline Range



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			Location	ID, Sample Depth, La	boratory ID, and San	nple Date	
		BMI-GP-23-S	BMI-GP-24-S	BMI-GP-25-S	BMI-GP-26-S	BMI-GP-27-S	BMI-GP-28-S
		8'-9'	9'-10'	10.5'-11.5'	12'-13'	10'-11'	10'-11'
		EV17030261-05	EV17030261-01	EV17030261-07	EV17030261-06	EV17030261-02	EV17030261-04
	Cleanup	3/28/2017	3/28/2017	3/28/2017	3/28/2017	3/28/2017	3/28/2017
Analyte	Level	Ν	Ν	Ν	Ν	N	N
Petroleum Hydrocarbons (mg/kg; NWTPH-Gx/Dx)							
TPH-Gasoline Range (C7-C12)	30	25 J	5,500 J	9.0 J	16 J	33 J	120 J
TPH-Diesel Range (C12-C24)	2,000	54	30,000	870	2,200	380	140
TPH-Oil Range (C24-C40)	2,000	50 U	2,500 U	50	250 U	100 U	50 U

			Location	ID, Sample Depth, La	boratory ID, and San	nple Date	
		BMI-GP-29-S	BMI-GP-30-S	BMI-GP-31-S	BMI-GP-32-S	BMI-GP-33-S	BMI-GP-35-S
		9.5'-10.5'	7.5'-8.5'	8'-9'	10'-11'	9'-10'	9'-10'
		EV17030261-10	EV17030261-09	EV17030261-11	EV17030289-01	EV17030289-03	EV17030289-04
	Cleanup	3/29/2017	3/29/2017	3/29/2017	3/29/2017	3/29/2017	3/30/2017
Analyte	Level	N	N	Ν	Ν	Ν	Ν
Petroleum Hydrocarbons (mg/kg; NWTPH-Gx/Dx)							
TPH-Gasoline Range (C7-C12)	30	250 J	150 J	1,300 J	150 J	210 J	9.2 J
TPH-Diesel Range (C12-C24)	2,000	4,800	1,700	10,000	3,300	1,500	25 U
TPH-Oil Range (C24-C40)	2,000	250 U	91	1,100	250 U	130	50 U

			Location	ID, Sample Depth, La	boratory ID, and San	nple Date	
		BMI-GP-36-S	BMI-GP-37-S	BMI-GP-38-S	BMI-GP-39-S	BMI-GP-40-S	BMI-GP-40-S
		10.5'-11.5'	11'-12'	9.5'-10.5'	10.5'-11.5'	8'-9'	9.5'-10.5'
		EV17030289-05	EV17030289-06	EV17030261-13	EV17030261-14	EV17030261-12	EV17030289-07
	Cleanup	3/30/2017	3/30/2017	3/29/2017	3/29/2017	3/29/2017	3/30/2017
Analyte	Level	N	N	Ν	Ν	N	Ν
Petroleum Hydrocarbons (mg/kg; NWTPH-Gx/Dx)							
TPH-Gasoline Range (C7-C12)	30	15 J	8.0 J	1,900 J	1,200 J	770 J	380 J
TPH-Diesel Range (C12-C24)	2,000	220	25 U	7,100	5,500	3,600	190
TPH-Oil Range (C24-C40)	2,000	50 U	50 U	500 U	250 U	270	50 U

			Location	ID, Sample Depth, La	boratory ID, and San	nple Date	
		BMI-GP-42-S	BMI-GP-43-S	BMI-GP-44-S	BMI-GP-45-S	BMI-GP-46-S	BMI-GP-47-S
		11.5'-12.5'	10'-11'	9.5'-10.5'	10'-11'	9.5'-10.5'	9'-10'
		EV17030289-02	EV17030289-08	EV17030289-09	EV17030289-10	EV17030289-11	EV17030289-12
	Cleanup	3/29/2017	3/30/2017	3/30/2017	3/30/2017	3/30/2017	3/30/2017
Analyte	Level	N	Ν	Ν	Ν	N	N
Petroleum Hydrocarbons (mg/kg; NWTPH-Gx/Dx)							
TPH-Gasoline Range (C7-C12)	30	17 J	96 J	370 J	78 J	680 J	27 J
TPH-Diesel Range (C12-C24)	2,000	25 U	4,700	1,800	1,700	1,100	710
TPH-Oil Range (C24-C40)	2,000	50 U	500 U	100 U	60	74	50 U

Notes:

U = The compound was not detected at the reported concentration.

J = The analyte was positively identified; the associated numerical value

is the approximate concentration of the analyte in the sample.

N = Primary sample

Bold text indicates detected analyte.

= reported result is greater than the screening level.

Abbreviations:

mg/kg = milligrams per kilogram

ID = identification

FD = field duplicate

N = primary sample

NWTPH = Northwest Total Petroleum Hydrocarbon

SDG = Sample delivery group

TPH = total petroleum hydrocarbons

Page 4 of 4

Table 2

Groundwater Analytical Results

Pre-Remedial Design Investigation

Blaine Marina, Inc. Site – Blaine, Washington

		Field Sample ID, Lab	Sample ID, Sample D	ate, & Sample Type		
		BMI-GP-27-GW	BMI-GP-30-GW	BMI-GP-38-GW	BMI-GP-39-GW	BMI-GP-40-GW
		EV17030261-03	EV17030261-08	EV17030261-17	EV17030261-16	EV17030261-18
	Cleanup	3/28/2017	3/29/2017	3/29/2017	3/29/2017	3/29/2017
Analyte	Level	N	N	N	N	N
Dissolved Metals (µg/L; EPA 200.8)						
Manganese		79	91	24	39	430
Conventionals (mg/L; EPA 300.0)						
Nitrogen, Nitrate (As NO ₃)		0.15 U	0.15 U	0.22	0.15 U	0.15 U
Sulfate		15	0.26 U	240	68	2.8
Petroleum Hydrocarbons (µg/L; NWTPH-Gx/Dx)						
TPH-Gasoline Range (C7-C12)	800	65	110	120	77	260 J
TPH-Diesel Range (C12-C24)	500	10,000	14,000	48,000	24,000	7,600
TPH-Oil Range (C24-C40)	500	860	500 U	2,500 U	1,200 U	420
Petroleum Hydrocarbons (mg/kg; NWTPH-HCID)						
HCID-Gasoline Range (C7-C12)						
HCID-Diesel Range (C12-C24)						
HCID-Oil Range (C24-C40)						
BTEX (μg/L; SW-846 8021B)						
Benzene	51	1.0 U	1.0 U	8.2	2.5	1.0 U
Toluene		1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Ethylbenzene		1.0 U	1.0 U	1.4	1.0 U	1.0 U
Xylenes, Total		3.0 U	3.0 U	3.0 U	3.0 U	3.0 U
SVOCs (µg/L; SW-846 8270D SIM)						
Naphthalene		0.020 U	0.020 U	53	15	740
2-Methylnaphthalene		29	20	79	5.9	150
1-Methylnaphthalene		34	15	91	50	110
Total Naphthalenes	83	63	35	223	71	1,000

Table 2

Groundwater Analytical Results

Pre-Remedial Design Investigation

Blaine Marina, Inc. Site – Blaine, Washington

		Field Sample ID, Lab	Sample ID, Sample D	ate, & Sample Type		
					DUP of	
		MW-4	MW-5	MW-6	MW-6	MW-7
		EV17030287-05	EV17030287-04	EV17030287-01	EV17030287-06	EV17030287-02
	Cleanup	3/30/2017	3/30/2017	3/30/2017	3/30/2017	3/30/2017
Analyte	Level	N	N	N	FD	N
Dissolved Metals (µg/L; EPA 200.8)						
Manganese		740	2.0 U	7.6	7.7	350
Conventionals (mg/L; EPA 300.0)						
Nitrogen, Nitrate (As NO ₃)		0.15 UJ	3.1	14	15	13 J
Sulfate		58	780	59	62	1,000
Petroleum Hydrocarbons (µg/L; NWTPH-Gx/Dx)						
TPH-Gasoline Range (C7-C12)	800	50 U	50 U	50 U	50 U	14,000
TPH-Diesel Range (C12-C24)	500	360	130 U	140	130 U	2,500 J
TPH-Oil Range (C24-C40)	500	250 U	250 U	250 U	250 U	490
Petroleum Hydrocarbons (mg/kg; NWTPH-HCID)						
HCID-Gasoline Range (C7-C12)						
HCID-Diesel Range (C12-C24)						
HCID-Oil Range (C24-C40)						
BTEX (μg/L; SW-846 8021B)						
Benzene	51	1.0 U	1.0 U	3.2	3.3	20 U
Toluene		1.0 U	1.0 U	1.0 U	1.0 U	20 U
Ethylbenzene		1.0 U	1.0 U	1.0 U	1.0 U	52
Xylenes, Total		3.0 U	3.0 U	6.0	5.9	210
SVOCs (μg/L; SW-846 8270D SIM)						
Naphthalene		0.020 U	0.020 U	0.020 U	0.020 U	170
2-Methylnaphthalene		0.020 U	0.020 U	0.020 U	0.020 U	120
1-Methylnaphthalene		0.020 U	0.020 U	0.020 U	0.020 U	210
Total Naphthalenes	83	0.020 U	0.020 U	0.020 U	0.020 U	500

Table 2

Groundwater Analytical Results

Pre-Remedial Design Investigation

Blaine Marina, Inc. Site – Blaine, Washington

		Field Sample ID, Lab	Sample ID, Sample D	ate, & Sample Type
		MW-8	MW-9 (PRODUCT)	MW-11
		EV17030287-07	EV17030287-08	EV17030287-03
	Cleanup	3/30/2017	3/30/2017	3/30/2017
Analyte	Level	N	N	N
Dissolved Metals (µg/L; EPA 200.8)				
Manganese		83		2.0 U
Conventionals (mg/L; EPA 300.0)				
Nitrogen, Nitrate (As NO ₃)		0.15 UJ		14 J
Sulfate		98		1,700
Petroleum Hydrocarbons (µg/L; NWTPH-Gx/Dx)				
TPH-Gasoline Range (C7-C12)	800	50 U		50 U
TPH-Diesel Range (C12-C24)	500	130 U		130 U
TPH-Oil Range (C24-C40)	500	250 U		250 U
Petroleum Hydrocarbons (mg/kg; NWTPH-HCID)				
HCID-Gasoline Range (C7-C12)			3,900	
HCID-Diesel Range (C12-C24)			15,000	
HCID-Oil Range (C24-C40)			20,000	
BTEX (μg/L; SW-846 8021B)				
Benzene	51	1.0 U		1.0 U
Toluene		1.0 U		1.0 U
Ethylbenzene		1.0 U		1.0 U
Xylenes, Total		3.0 U		3.0 U
SVOCs (μg/L; SW-846 8270D SIM)				
Naphthalene		0.020 U		0.020 U
2-Methylnaphthalene		0.020 U		0.020 U
1-Methylnaphthalene		0.020 U		0.020 U
Total Naphthalenes	83	0.020 U		0.020 U

Table 2Groundwater Analytical ResultsPre-Remedial Design Investigation

Blaine Marina, Inc. Site – Blaine, Washington

Notes:

U = The compound was not detected at the reported concentration.

- J = The analyte was positively identified; the associated numerical value is the approximate concentration of the analyte in the sample.
- UJ = The analyte was not detected in the sample; the reported sample reporting limit is an estimate.

Bold text indicates detected analyte.

-- = Not analyzed

= reported result is greater than the screening level.

Abbreviations:

mg/kg = milligrams per kilogram

- mg/L = milligrams per liter
- μ g/L = micrograms per liter
- EPA = US Environmental Protection Agency

FD = field duplicate

HCID = hydrocarbon identification

N = primary sample

- NA = screening level not available
- NWTPH = Northwest Total Petroleum Hydrocarbon
- SIM = selected ion monitoring

SVOC = semivolatile organic compound

TPH = total petroleum hydrocarbons

ATTACHMENT 1

Logs of Exploration

	MAJOR DIVISIONS		GRAPHIC SYMBOL	cation Sys USCS LETTER SYMBOL ⁽¹⁾	TYPICAL DESCRIPTIONS ⁽²⁾⁽³⁾
 ب ش ش	GRAVEL AND	CLEAN GRAVEL			Well-graded gravel; gravel/sand mixture(s); little or no fines
SOIL rial is e size)	GRAVELLY SOIL	(Little or no fines)	$\begin{array}{c} 0 \\ 0 \\ 0 \\ 0 \\ 0 \\ 0 \\ 0 \\ 0 \\ 0 \\ 0 $	GP	Poorly graded gravel; gravel/sand mixture(s); little or no fines
	(More than 50% of coarse fraction retained	GRAVEL WITH FINES (Appreciable amount of	<u> </u>	GM	Silty gravel; gravel/sand/silt mixture(s)
-GRAINED 50% of mate No. 200 sieve	on No. 4 sieve)	fines)	[][]]	GC	Clayey gravel; gravel/sand/clay mixture(s)
No. 10 No. 10 No	SAND AND SANDY SOIL	CLEAN SAND		SW	Well-graded sand; gravelly sand; little or no fines
RSE e thai than		(Little or no fines)		SP	Poorly graded sand; gravelly sand; little or no fines
COARSE (More than larger than	(More than 50% of coarse fraction passed	SAND WITH FINES (Appreciable amount of		SM	Silty sand; sand/silt mixture(s)
	through No. 4 sieve)	fines)		SC	Clayey sand; sand/clay mixture(s)
INE-GRAINED SOIL (More than 50% of material is smaller than No. 200 sieve size)	SILT AND CLAY			ML CL	Inorganic silt and very fine sand; rock flour; silty or clayey fine sand or clayey silt with slight plasticity Inorganic clay of low to medium plasticity; gravelly clay; sandy clay; silty clay; lean clay
ED 50% ve si	(Liquid limi	(Liquid limit less than 50)		OL	clay, silty clay; lean clay Organic silt; organic, silty clay of low plasticity
FINE-GRAINED (More than 50% material is smalle No. 200 sieve s					Inorganic silt; micaceous or diatomaceous fine sand
-GR flore erial	SILT A	ND CLAY		CH	Inorganic sin, micaceous of diatomaceous intersand
∐lestarz L	(Liquid limit	greater than 50)		OH	Organic clay of medium to high plasticity; organic silt
ш.		RGANIC SOIL		PT	Peat; humus; swamp soil with high organic content
	OTHER MAT		GRAPHIC	LETTER	TYPICAL DESCRIPTIONS
	PAVEM	ENT	•	AC or PC	Asphalt concrete pavement or Portland cement pavement
	ROCH	<		RK	Rock (See Rock Classification)
	WOO	D		WD	Wood, lumber, wood chips
	DEBR	IS	6/0/0/	DB	Construction debris, garbage
			iteu in the Star	ndard Practice fo	or Description and Identification of Soils (Visual-Manual
Me 3. Soil as	thod for Classification of So description terminology is follows: Primary O Secondary C Additional C	D 2488. Where laboratory in oils for Engineering Purposes based on visual estimates (ir Constituent: > 50 onstituents: > 30% and \leq 50 > 15% and \leq 30 onstituents: > 5% and \leq 15 \leq 5	dex testing has a as outlined ir the absence of % - "GRAVEL % - "very grav % - "gravelly," % - "with grav % - "with trace	s been conducte h ASTM D 2487. of laboratory tesi ," "SAND," "SILT relly," "very sand "sandy," "silty," el," "with sand," e gravel," "with tr	ý," "very śiłty," etc. etc. "with silt," etc. ace sand," "with trace silt," etc., or not noted.
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SAMP	LE D	ATA			SOIL PRO	OFILE	GROUND	WATER
Sample Number & Interval	Sampler Type	Blows/Foot	Granhic Symbol	USCS Symbol	Drilling Method: <u>Geo</u> Ground Elevation (ft):		Water Level	
		0	.0	AC SP	Asphalt Brown to gray, fine to gravel; No odor, no sh			
	i3		.0	SP/ ML	Highly stratified SAND shells to 3.2 feet BGS (medium dense/stiff, d	; No odor, no sheen.		
			5	ML	Gray SILT with shells; odor, no sheen. (medi			
	i3	3	1 0 2					
0	i3	1	2 6 4	SP/ SM	Gray SAND with shells petroleum like odor, sl wet) Soil Sample: BMI-GP- -Heavy sheen, metallio BGS.	ight sheen. (loose, 31-S(8'-9')	ATD	
2 – –			.5		-Moderate sheen at 10).5 feet BGS.		
4	i3	0	.0	ML	Gray SILT; Stong petri sheen. (stiff, wet)	oleum like odor, no		
; _				SP	Black, fine SAND with petroleum-like odor, no dense, wet)			
т	Boring otal Dept	Complete	d 03/29/11 g = 16.0 fi	7 				
3								
) Notes:	2. Refe	rence to th	e text of t	his report i		approximate. Jerstanding of subsurface co ion of graphics and symbols.		
_			Pla	ino Mo	rina Tank Farm		Boring BMI-GP-31	




































APPENDIX B

Hazardous Building Materials Survey

Report Hazardous Building Materials Survey Blaine Marina, Inc. Site Blaine, Washington

November 6, 2017

Prepared for

Port of Bellingham Bellingham, Washington



130 2nd Avenue South Edmonds, WA 98020 (425) 778-0907

Hazardous Building Materials Survey Blaine Marina, Inc. Site Blaine, Washington

This document was prepared by, or under the direct supervision of, the technical professionals noted below.

Document prepared by: ______ Primary Author

Cody M. Johnson, PE AHERA Building Inspector 138159 AHERA Project Designer 138714

Document reviewed by:

Quality Reviewer

Piper M. Roelen, PE

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ATTACHMENTS

Attachment <u>Title</u>

- 1 AHERA Building Inspector Certificate
- 2 Laboratory Analytical Reports

LIST OF ABBREVIATIONS AND ACRONYMS

ACM	asbestos-containing material
AHERA	Asbestos Hazard Emergency Response Act
AST	aboveground storage tank
CFR	Code of Federal Regulations
EPA	US Environmental Protection Agency
HBMS	hazardous building materials survey
LAI	Landau Associates, Inc.
LCP	lead-containing paint
mg/kg	milligrams per kilogram
mg/L	milligrams per liter
NVL	NVL Labs
NWCAA	Northwest Clean Air Agency
PCBs	polychlorinated biphenyl
Port	Port of Bellingham
Site	214 Sigurdson Avenue, Blaine, Washington
sf	square foot/feet
TCLP	Toxicity Characteristic Leaching Procedure
TSCA	Toxic Substances Control Act
WAC	Washington Administrative Code
WISHA	Washington State Industrial Safety and Health Administration

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1.0 INTRODUCTION

Landau Associates, Inc. (LAI) completed a hazardous building materials survey (HBMS) for asbestoscontaining material (ACM), lead-containing paint (LCP), and polychlorinated biphenyl (PCB)-containing materials at the Blaine Marina, Inc. site (Site) located at 214 Sigurdson Avenue in Blaine, Washington (Figure 1). The scope of the HBMS included the furniture retail building, two smaller storage buildings adjacent to the northeast of the main building, and three aboveground storage tanks (ASTs) and associated piping located adjacent to the north of the main building. The survey was conducted for the Port of Bellingham (Port) prior to demolition of the buildings and tanks, which is needed to provide access for planned remedial excavation to remove petroleum hydrocarbon-contaminated soil beneath the tanks and buildings. This report describes the HBMS procedures and presents the findings of the survey.

2.0 **REGULATORY COMPLIANCE**

The following section provides a discussion of relevant regulatory compliance related to the potential presence of ACM and LCP at the Site.

2.1 Asbestos

The Asbestos Hazard Emergency Response Act (AHERA) regulation (40 Code of Federal Regulations [CFR] 763) is the primary governing regulation for performing asbestos surveys. AHERA defines suspect ACM and specifies the minimum number of samples to be collected and analyzed from a suspect material. AHERA was originally enacted for school buildings; however, since 1994 it has been applied to public and commercial buildings by the Asbestos School Hazard Abatement Reauthorization Act. The US Occupational Safety and Health Administration and Washington Industrial Safety and Health Act worker protection regulations, specifically 29 CFR 1926.1101(k) and Washington Administrative Code (WAC) 296-62-077, have also incorporated AHERA for demolition and renovation projects.

The Northwest Clean Air Agency Asbestos Control Standards (Section 570), should be consulted prior to renovation or demolition of structures containing ACM. This regulation is available at the following web address: <u>http://nwcleanairwa.gov/regulation/section-550-590/</u>. Typically, certified abatement contractors will prepare the required notifications prior to a planned asbestos abatement project.

2.2 Lead

Worker and environmental protection requirements apply to all construction activities that may disturb materials containing lead. Precautions must be taken during demolition and remodeling activities in accordance with Washington State regulations to address worker safety and the protection of human health and the environment. Worker exposure, public health, and waste characterization are issues of concern when working with LCP during building demolition or remodeling. When workers may be exposed to lead, it is the employer's responsibility to ensure that work practices are in accordance with the US Environmental Protection Agency's (EPA) Lead Renovation, Repair, and Painting rule, 40 CFR 745. The property owner(s) should ensure that the public does not have access to the property during demolition or remodeling activities.

2.3 Polychlorinated Biphenyls

PCBs are a federally regulated hazardous material. The disposal of PCBs is regulated by the EPA under the Toxic Substances Control Act (TSCA). Materials with PCB concentrations greater than 50 milligrams per kilogram (mg/kg) are considered PCB bulk product waste and must be disposed of under TSCA guidelines (40 CFR 761). The EPA requires all PCB bulk product waste be removed by a certified abatement company once it has been identified. Based on the age of the structures, building materials such as caulking, insulation, putty, and paint may contain PCBs. PCBs were added to these materials as a plasticizing agent until the use of PCBs was banned in the United States in 1979. Additionally, fluorescent light ballasts (FLBs) produced prior to 1979 may contain PCBs and must be identified and segregated prior to disposal of the fluorescent light fixture.

3.0 HAZARDOUS BUILDING MATERIALS SURVEY

LAI conducted the HBMS at the Site on March 7, 2017. The HBMS was conducted to screen for the presence of hazardous building materials that will require special handling and disposal prior to, or during, demolition. The structures included in the scope of the HBMS were:

- The Blaine Marina, Inc. building: An approximately 6,000-square-foot (sf), slab-on-grade building with an approximately 2,550-sf second story over the eastern end of the building. The building is wood-framed with exterior wood siding and a flat torch-down roof. Apart from a Verizon telecommunications room on the second floor containing equipment to power and control cellular phone transmitters on the building's roof, the building was unoccupied and empty at the time of the HBMS.
- Two approximately 1,200-sf, single-story, slab-on-grade storage buildings located adjacent to the northeast of the Blaine Marina, Inc. building. These buildings were both wood-framed with a mix of wood and corrugated metal siding, and corrugated metal roofs. The building immediately adjacent to the northeast corner of the Blaine Marina, Inc. building was unoccupied and empty at the time of the HBMS. The other storage building contained tanks and equipment reportedly associated with the Drayton Harbor Seafood company. The presence of the equipment did not restrict access for the HBMS.
- Three metal ASTs and their associated piping located adjacent to the north of the Blaine Marina, Inc. building. Each AST was approximately 15 feet tall and 9 feet in diameter. The tanks appeared to be empty and the piping inoperable at the time of the HBMS.

3.1 Asbestos

The purpose of the ACM survey described in this report was to evaluate materials in or on the buildings at the Site for the presence of asbestos that would require abatement prior to demolition. The survey was conducted in compliance with the asbestos good faith inspection requirements of WAC 296-62-077, which requires the building owner to identify and properly dispose of ACM that may be encountered during demolition or renovation activities.

The scope of services included the following:

- An asbestos survey conducted by AHERA-certified building inspectors (certificates provided in Attachment 1) with a focus on identifying accessible suspect ACM. The survey included inspection and sampling of accessible suspect interior building materials likely to be affected by the renovations. Destructive sampling was conducted to access materials hidden within or behind walls or ceilings.
- Collecting bulk samples of suspect ACM in accordance with Washington State Department of Ecology guidelines for surveys of buildings related to demolition or renovation projects.
- Submitting bulk samples to a laboratory for asbestos analysis by polarized light microscopy with dispersion staining by US EPA Method 600/R-93/116.
- Recording the quantity and locations of suspect ACM.
- Preparing a report that summarizes the findings and conclusions of the survey.

AHERA specifies that only one positive asbestos result necessitates designating a suspect material as ACM. It also specifies the minimum number of samples to be collected and analyzed to establish that a suspect ACM is non-ACM, based on the material type. The three material types recognized by AHERA are: surfacing materials, thermal system insulation, and miscellaneous materials.

LAI collected 39 samples of suspect materials for analysis in accordance with AHERA sampling protocols and the procedures described in the Pre-Remedial Design Investigation Work Plan (LAI 2017)¹. The samples were collected using a clean knife or chisel to penetrate all layers of each material. At least one teaspoon of each material was collected for analysis and placed in a laboratory-provided bag labeled with the location and sample identification. Prior to sampling potentially friable materials, a respirator was donned by the sampler and the sampling area was wetted with distilled water. All sampling equipment was wiped clean with a paper towel between sample locations. Following sample collection, a sample description and an estimated quantity of the suspect ACM were recorded on a field sample inventory form. This information, along with a summary of the laboratory analytical results, is provided in Table 1. The sample locations are shown on Figures 2 and 3

The samples were submitted to NVL Labs (NVL) of Seattle, Washington under standard chain-ofcustody protocols for asbestos analysis by the method described above.

3.2 Lead-Containing Materials

A survey was conducted to assess the lead content in the various types of paint in or on the buildings. The survey included the collection of representative samples from the discrete paint types observed.

LAI collected 23 paint samples using a clean utility knife or chisel to scrape off at least 0.5 grams of paint into a laboratory-supplied sample bag. The knife or chisel was cleaned between samples using disposable baby wipes. A separate sample containing the paint and the underlying substrate was collected concurrently with the paint-chip sample. The paint-and-substrate sample was used to generate a composite sample representative of the waste stream that likely to contain painted material from the building for waste designation analysis.

Table 2 describes the paints identified for sampling, the locations that were sampled, and a summary of the laboratory analytical results. The paint-chip sample locations are shown on Figures 2 and 3.

The paint-chip and waste designation samples were submitted to NVL under standard chain-ofcustody protocols. The paint-chip samples were analyzed using atomic absorption by EPA Method 7000B. The waste designation samples were analyzed for leachable lead using the Toxicity Characteristic Leaching Procedure (TCLP) to produce a leachate sample and EPA Method 7000B to determine the lead concentration of the leachate.

¹ LAI. 2017. Pre-Remedial Design Investigation Work Plan, Blaine Marina Inc. Site, Blaine, Washington. Landau Associates, Inc. March 14.

3.3 **PCB-Containing Materials**

Two composite samples of potential PCB-containing materials were collected during the HBMS for laboratory analysis, as described in Table 4. The composite samples consisted of similar material types: sample BMI-PCB-1 was made up of the paints observed in and on the buildings and sample BMI-PCB-2 consisted of the various caulks.

The samples were submitted to NVL under standard chain-of-custody procedures for PCB analysis by EPA Method 8082.

Fluorescent light fixtures in the buildings were screened for PCB-containing fluorescent light ballasts using a hand-held ballast checker, which can distinguish magnetic ballasts that typically contain PCBs from electronic ballasts that do not. Fixtures indicated to be magnetic using the ballast checker were opened and the ballasts were inspected for "No PCBs" stickers. Those without "No PCBs" stickers are assumed to contain PCBs.

4.0 HAZARDOUS BUILDING MATERIALS SURVEY RESULTS

The analytical results for the samples of suspect ACM, LCP, PCB-containing materials, and the waste disposal characterization sample collected for the survey are presented in the following sections. The results are summarized in Tables 1 through 3 and the laboratory analytical reports are provided in Attachment 2.

4.1 Asbestos

Materials sampled during the HBMS included various paints, vinyl floor tiles, gypsum wallboard systems, cove base, built-up roofing materials, carpets and associated adhesives, acoustic ceiling tiles, faux-wood paneling and associated adhesive, leveling compound, popcorn ceiling texture, gaskets on the tank piping and access hatches, and caulks. A minimum of one sample was collected of each potential or suspect ACM type from each homogeneous area.

Asbestos was detected at concentrations exceeding 1 percent in four of the materials sampled:

- Popcorn ceiling texture on the first-floor ceiling
- Beige vinyl floor tiles at the west end of the first floor
- Silver-coat roofing paint on the west side of the roof
- Gaskets on the lower access hatches of the northern and middle ASTs.

These materials would therefore be considered ACM under AHERA. Table 1 provides a summary of the analytical results along with an estimate of the quantity of each ACM and an evaluation of their friability.

The gypsum wallboard system within the main building (excluding the Verizon telecommunications room) was found to contain asbestos at less than 1 percent when taken as a composite, as allowed under Washington State Industrial Safety and Health Administration (WISHA) Regional Directive 23.30 (Department of Labor and Industries 2000). Because it was found to contain less than 1 percent asbestos, it is not considered to be an ACM. However, WISHA requires additional work practices and training when disturbing this material.

One fire door was observed at the second-floor entrance to the Verizon telecommunications room. Fire doors typically contain asbestos; however, because opening the door to inspect the interior would void the door's warranty, it was not opened for sampling. The door should be considered an ACM unless opened and sampled to prove otherwise.

Due to fall protection issues, the access hatches on the tops of the ASTs were not opened to inspect for gaskets. Gaskets on these hatches should be assumed to be ACM unless sampling and analysis proves otherwise.

4.2 Lead

Paints sampled during the HBMS included silver-coat roofing paint, gray-blue exterior wall paint, white exterior trim paint, multiple colors of interior wall paints, white paint under faux-wood paneling, red and gray exterior foundation wall paint, and gray-blue paint on the ASTs. Lead was detected in 16 of the 23 samples collected at concentrations ranging from 82 mg/kg (0.0082 percent) on the gray-blue AST paint to 18,000 mg/kg (1.8 percent) in the white wall paint beneath the faux-wood paneling in the main Blaine Marina, Inc. building. The complete list of results of lead in paint chips are provided in Table 2.

The waste designation sample consisting of a composite of each of the paints sampled along with the underlying substrate was found to contain less than 0.5 milligrams per liter (mg/L) of lead, as shown in Table 3. This is below the hazardous waste toxicity characteristic threshold for lead of 5 mg/L.

4.3 **Polychlorinated Biphenyls**

A total of 87 fluorescent light fixtures containing 204 fluorescent light tubes and 87 ballasts were observed in the buildings. Based on the results of the ballast-checker screening and inspection of a limited number of fixtures, no PCB-containing ballasts are expected to be present in the buildings. However, the fluorescent light tubes are considered a Universal Waste and must be packaged and disposed of in accordance with WAC 173-303-573(5).

PCBs were not detected in the two composite bulk material samples analyzed, as shown in Table 4.

4.4 Miscellaneous Materials

During the HBMS field work, a thermostat located inside the Verizon telecommunications room on the second floor of the Blaine Marina, Inc. building was opened and observed to contain mercury switches. The location of this thermostat is shown on Figure 2. The other thermostats in the building were subsequently opened and inspected. No other mercury switches were observed.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The sampling and analysis of potential/suspect ACM in the survey area identified four materials as ACM: popcorn ceiling texture, silver-coat roofing paint, vinyl floor tiles, and access hatch gaskets on two of the ASTs. Two other materials, the fire door at the entrance to the Verizon telecommunications room and gaskets on the access hatches on the tops of the ASTs, were not sampled, but are assumed to be ACM. Additionally, the gypsum wallboard system throughout most of the main building contained asbestos at less than 1 percent when taken as a composite.

We recommend that the materials positively identified as ACM be abated in accordance with all appropriate state and federal regulations prior to building demolition. The popcorn ceiling texture and silver-coat paint should be considered to be friable under AHERA. Abatement of these materials will therefore be Class I asbestos work. Abatement of the non-friable floor tiles, gaskets, and fire door will be Class II asbestos work.

While the wallboard system containing less than 1 percent asbestos is not considered an ACM, certain requirements still apply to removal of this material, including:

- Wet, non-aggressive methods must be used and cleanup of material must be prompt
- Vacuums used must be HEPA-filtered.
- Worker training must include asbestos awareness and hands-on training as promulgated in WAC 296-62-07722(5).
- Respiratory protection must be based on overall dust levels.
- A competent person must be assigned and trained under the requirements of WAC 296-62-07728.

Lead was detected in 16 of the 23 paints sampled in the buildings. Therefore, precautions must be taken during demolition to address worker safety, protection of human health and the environment, and disposal of demolition debris in accordance with state regulations. When workers may be exposed to lead, it is the employer's responsibility to ensure that work practices are in accordance with the Washington State Department of Labor and Industries' lead in construction rule (WAC 296-155-176) and, for non-demolition projects, the EPA's Lead Renovation, Repair, and Painting rule, 40 CFR 745. The property owner should ensure that the public does not have access to the property during demolition activities.

TCLP analysis found that the composite waste designation sample leached less than 5 mg/L lead, which is the hazardous waste toxicity characteristic threshold for lead under 40 CFR Part 261 and WAC 173-303-090. The painted material in the building would therefore not be considered a characteristic hazardous waste due to the LCP and may be disposed of at any landfill permitted to accept it.

Eighty-seven fluorescent light fixtures containing a total of 204 bulbs and 87 ballasts were present in the buildings. Fixtures with ballasts indicated to be magnetic (using the ballast checker), and therefore

potentially PCB-containing, were opened and inspected for "No PCBs" stickers. All of the ballasts inspected had "No PCBs" stickers so no PCB-containing ballasts are expected to be present at the Site. The fluorescent light tubes should be removed prior to demolition and recycled or disposed of as Universal Wastes.

PCBs were not detected in the two bulk composite samples collected for analysis. The presence of PCBs is therefore not expected to affect the demolition work or debris disposal.

A thermostat located inside the Verizon telecommunications room on the second floor of the furniture store building was identified as containing mercury switches. We recommend that the thermostat be removed by the abatement contractor and disposed of in accordance with the appropriate state and federal regulations.

6.0 LIMITATIONS

A good-faith HBMS was conducted to identify ACM and LCP in the Site buildings. Construction methods and materials use vary with contractor and construction trades, and suspect ACM may exist in non-typical locations that were not investigated. During the demolition process, care should be taken that additional suspect materials, if present, are not disturbed without following the appropriate regulatory requirements for sampling and analysis. Where suspect materials are encountered, they should be assumed to be ACM until shown to be negative for asbestos through laboratory analysis. If laboratory analysis is not performed, all suspect materials should be assumed to be ACM.

LAI performed this sampling consistent with the level of care and skill ordinarily exercised by professionals currently practicing under similar conditions in the industry. No other warranty, express or implied, is made. Reuse of the information in this report for any other purpose without LAI's written authorization shall be at the client's risk. The client agrees to indemnify and hold harmless LAI from all actions, claims, damages, and expense, including attorney fees, arising out of any unauthorized reuse.

This report has been prepared for the exclusive use of the Port of Bellingham and its representatives. The analyses, conclusions, and recommendations presented in this report are based on conditions encountered at the time of our study and on our experience and judgment. LAI cannot be held responsible for the interpretation by others of the data in this report.



G:\Projects\001\034\010\023\HBMS\F01VicMap.mxd 4/4/2017



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Sample Locations Shed Buildings and ASTs

Figure

3

Table 1 Analytical Results – Asbestos Samples Hazardous Building Materials Survey Blaine Marina, Inc. Site – Blaine, Washington

Sample Name	Material Description	Asbestos Content	Friable?	Estimated Quantity of Confirmed ACM
BMI- DW1-1		Joint Compound: ND		
BMI- DW1-2	Gypsum wallboard system in Verizon room	Drywall: ND		
BMI- DW1-3		Tape: ND		
BMI- CB1-1	3" Brown cove base	Cove Base: ND		
		Mastic: ND Tile: ND		
BMI- VFT1-1	12" x 12" Beige marble vinyl floor tile	Mastic: ND		
	12" x 12" Beige/brown marble vinyl floor tile on first	Substrate: ND Tile: CH 4%		
BMI- VFT2-1	floor	Mastic: ND	No	1,200 sf
BMI- VFT3-1	12" x 12" Dark gray vinyl floor tile	Tile: ND Mastic: ND		
		Tile: ND		
BMI- VFT4-1	12" x 12" Green with black specks vinyl floor tile	Mastic: ND		
BMI- WG1-1	Caulk on interior side of windows	ND		
BMI- WG2-1	Caulk on exterior side of windows	ND		
_		Shingle Layer 1: ND		
		Shingle Layer 2: ND		
BMI- RM1-1	Built-up roofing material on first-floor roof	Asphaltic Mastic: ND		
		Membrane: ND		
		Shingle Layer: ND		
BMI- RM2-1	Built-up roofing material on second-floor roof	Asphaltic Mastic: ND		
		Membrane: ND		
BMI- P1-1	Silver coat roofing paint	CH 4%	Yes	3,500 sf
		Silver Paint: ND		
BMI- P2-1	White and silver paint w/fibrous mesh	Yellow Paint: ND		
		Tape: ND		
BMI- CP1-1	Red and brown carpet on second floor	Carpet: ND Mastic: ND		
		Carpet: ND		
BMI- CP2-1	Gray carpet	Mastic: ND		
		Carpet: ND		
BMI- CP3-1	Blue/gray mottled carpet	Mastic: ND		
		Carpet: ND		
BMI- CP4-1	Brown carpet	Mastic: ND		
		Leveling Compound: ND		
BMI- ACT1-1	2' x 4' Acoustic ceiling tile	ND		
BMI- ACT2-1	12" x 12" nail-up acoustic ceiling tiles	ND		
BMI- AD1-1	Adhesive on wood paneling	ND		
		Joint Compound: CH2%		
BMI- DW2-1		Drywall: ND		
		Composite: <1%		
BMI- DW2-2		Joint Compound: CH <1% Drywall: ND		
	Gypsum wallboard system on walls and ceiling	Joint Compound: CH2%		
BMI- DW2-3	Sypsum wandoard system on wans and tening	Drywall: ND		
		Composite: <1%		
BMI- DW2-4		Joint Compound: ND Drywall: ND		
BMI- DW2-5		ND		

Table 1 Analytical Results – Asbestos Samples Hazardous Building Materials Survey Blaine Marina, Inc. Site – Blaine, Washington

Sample Name	Material Description	Asbestos Content	Friable?	Estimated Quantity of Confirmed ACM
BMI- LC1-1	Leveling compound over sump covers	Leveling Compound: ND Carpet Mastic: ND		
BMI- WP1-1	Faux wood paneling	ND		
BMI- TX1-1		CH 5%		
BMI- TX1-2		Naª		
BMI- TX1-3		NA ^a		
BMI- TX1-4	Popcorn ceiling texture	NA ^a	Yes	5,500 sf
BMI- TX1-5		NA ^a		
BMI- TX1-6		NA ^a		
BMI- TX1-7		NA ^a		
BMI- DW3-1	Bare drywall in Drayton Harbor shed	ND		
BMI- GA1-1	Gaskets on north and middle ASTs access hatches	CH 23%	No	2 Gaskets
BMI- GA2-1	Gaskets on southernmost AST access hatches	ND		
BMI- GA3-1	Gaskets on ground-level piping	ND		
	Gaskets on AST top access hatches	Assumed	No	3 Gaskets
	Fire Door	Assumed	No	1 Door

Note:

^a Positive sample result for BMI-TX1-1 indicates material is ACM. Remaining samples of this material not analyzed.

Abbreviations and Acronyms:

ND = not detected

NA = not analyzed

ACM = asbestos-containing material

AST = aboveground storage tank

CH = chrysotile

sf = square feet

Table 2 Analytical Results – Lead Paint-Chip Samples Haardous Building Materials Survey Blaine Marina, Inc. Site – Blaine, Washington

Sample Name	Material Description	Lead Concentration (mg/kg)	Lead Concentration (percent)
BMI- LP-1	Silver-coat roofing paint	< 56	< 0.0056
BMI- LP-2	Gray-blue exterior paint	< 54	< 0.0054
BMI- LP-3	Red-brown paint on second-floor faux-wood paneling	1,400	0.14
BMI- LP-4	Cream-colored paint n first-floor faux-wood paneling and columns	1,400	0.14
BMI- LP-5	Red-brown paint on first-floor faux-wood paneling and columns	< 200	< 0.02
BMI- LP-6	Dark brown paint on metal poles	4,900	0.49
BMI- LP-7	Dark cream-colored paint on CMU block walls	1,400	0.14
BMI- LP-8	Light cream-colored paint on CMU block walls	1,400	0.14
BMI- LP-9	Orange-brown paint on CMU block walls	4,400	0.44
BMI- LP-10	Dark-brown paint on wooden ceiling beams	160	0.016
BMI- LP-11	Very dark brown paint on window casings	690	0.069
BMI- LP-12	Pink paint on wood wall	< 110	< 0.011
BMI- LP-13	Layered paint (orange/brown/cream) on wood	2,600	0.26
BMI- LP-14	Beige paint on lower half of walls	< 130	<0.013
BMI- LP-15	White paint on wood under paneling	18,000	1.8
BMI- LP-16	White paint on support posts	2,300	0.23
BMI- LP-17	Beige paint on CMU block walls	< 49	< 0.0049
BMI- LP-18	Brown paint on CMU block walls	720	0.072
BMI- LP-19	Red paint on CMU block walls	1,300	0.13
BMI- LP-20	Exterior white trim paint	12,000	1.2
BMI- LP-21	White and silver paint in garage area	< 80	< 0.008
BMI- LP-22	Gray-blue paint on tanks	82	0.0082
BMI- LP-23	Red and gray exterior paint at base of north walls	14,000	1.4

< = Not detected above detection limit shown

mg/kg = milligrams per kilogram

CMU = concrete masonry unit

Table 3 Analytical Result – Waste Designation Sample Hazardous Building Materials Survey Blaine Marina, Inc. Site – Blaine, Washington

Sample Name	Material Description	Leachable Lead Concentration (mg/L)	Hazardous Waste Toxicity Characterisitc Concentration for Lead (mg/L)
BMI- TCLP-1	Composite sample of painted materials	0.5	5

mg/L = milligrams per liter

Page 1 of 1

Table 4 Analytical Results – PCB Samples Hazardous Building Materials Survey Blaine Marina, Inc. Site – Blaine, Washington

Sample Name	Material Description	PCB Concentration (mg/kg)
BMI- PCB-1	Composite paint sample	< 1.2
BMI- PCB-2	Composite caulk sample	< 5.2

< = Not detected above detection limit shown

mg/kg = milligrams per kilogram

ATTACHMENT 1

AHERA Building Inspector Certificate
Certificate of Completion

This is to certify that

Cody M. Johnson

has satisfactorily completed 4 hours of refresher training as an

Asbestos Building Inspector

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

Certificate #



May 25, 2016

Date(s) of Training Exam Score: NA Expiration Date: May 25, 2017

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A TETTACOTI COMPANY

ATTACHMENT 2

Laboratory Analytical Reports

March 16, 2017

Cody Johnson Landau Associates 130 2nd Avenue South Edmonds, WA 98020



Laboratory | Management | Training

RE: Bulk Asbestos Fiber Analysis; NVL Batch # 1704290.00

Client Project: 001034.010.016 Location: Blaine Marina Inc.

Dear Mr. Johnson,

Enclosed please find test results for the 39 sample(s) submitted to our laboratory for analysis on 3/8/2017.

Examination of these samples was conducted for the presence of identifiable asbestos fibers using polarized light microscopy (PLM) with dispersion staining in accordance with both **EPA 600/M4-82-020**, Interim Method for the Determination of Asbestos in Bulk Insulation Samples and **EPA 600/R-93/116** Method for the Determination of Asbestos in Bulk Building Materials.

For samples containing more than one separable layer of materials, the report will include findings for each layer (labeled Layer 1 and Layer 2, etc. for each individual layer). The asbestos concentration in the sample is determined by calibrated visual estimation.

For those samples with asbestos concentrations between 1 and 10 percent based on visual estimation, the EPA recommends a procedure known as point counting (NESHAPS, 40 CFR Part 61). Point counting is a statistically more accurate means of quantification for samples with low concentrations of asbestos.

The detection limit for the calibrated visual estimation is <1%, 400 point counts is 0.25% and 1000 point counts is 0.1%

Samples are archived for two weeks following analysis. Samples that are not retrieved by the client are discarded after two weeks.

Thank you for using our laboratory services. Please do not hesitate to call if there is anything further we can assist you with.

Sincerely,

Nick Ly, Technical Director

1.888.NVL.LABS Enc.: Sample Results 1.888.(685.5227) www.nvllabs.com



Lab Code: 102063-0

NVL Laboratories, Inc. 4708 Aurora Ave N, Seattle, WA 98103 p 206.547.0100 | f 206.634.1936

page 1 of 19



Bulk Asbestos Fibers Analysis By Polarized Light Microscopy

Clien	t: Landau Associates				Batch #: 1704290.00
Address	: 130 2nd Avenue South			Clie	nt Project #: 001034.010.016
	Edmonds, WA 98020				Date Received: 3/8/2017
					Samples Received: 39
	: Mr. Cody Johnson				Samples Analyzed: 33
Project Location	^{1:} Blaine Marina Inc.				Method: EPA/600/R-93/116
					& EPA/600/M4-82-020
Lab ID: 1702'	968 Client Sample #: BMI	-ACT1-1			
Location: Blair	e Marina Inc.				
Layer 1 of 1	Description: Brown compressed fit	orous materia	with paint		
	Non-Fibrous Ma	iterials:	Other Fibrous Materi	als:%	Asbestos Type: %
	Binder/Filler, Wood flakes	s, Paint	Cellulose	54%	None Detected ND
			Wood fibers	34%	
Lab ID: 1702'	969 Client Sample #: BMI	-ACT2-1			
Location: Blair	e Marina Inc.				
Layer 1 of 1	Description: Brown compressed fit	orous materia	l with paint		
	Non-Fibrous Ma	iterials:	Other Fibrous Materi	als:%	Asbestos Type: %
	Binder/Filler, Wood flakes	s. Paint	Cellulose	56%	None Detected ND
		Perlite	Wood fibers		
Lab ID: 1702'					
Location: Blair		-AD1-1			
Layer 1 of 1	Description: White compacted pow	dery materia	with paint and paper		
	Non-Fibrous Ma	•	Other Fibrous Materi	als:%	Asbestos Type: %
Calcare	ous particles, Calcareous binder, Pair		Cellulose		None Detected ND
Lab ID: 1702 [,]	971 Client Sample #: BMI	-CB1-1			
Location: Blair	e Marina Inc.				
Lover 1 of 2	Description: Brown rubbery materia	al			
Layer 1 of 2	Beschption. Drown rubbery materia				
Layer 1 01 2	Non-Fibrous Ma		Other Fibrous Materi	als:%	Asbestos Type: %
Layer 1 01 2	•	iterials:	Other Fibrous Materi None Detected	als:% ND	Asbestos Type: % None Detected ND
Layer 1 of 2	Non-Fibrous Ma	iterials:			
Sampled k	Non-Fibrous Ma Rubber/Binder, Binde	iterials:			
Sampled b	Non-Fibrous Ma Rubber/Binder, Binde	iterials:	None Detected		

600/R-93/116 and 600/M4-82-020 Methods with the following measurement uncertainties for the reported % Asbestos (1%=0-3%, 5%=1-9%, 10%=5-15%, 20%=10-30%, 50%=40-60%). This report relates only to the items tested. If sample was not collected by NVL personnel, then the accuracy of the results is limited by the methodology and acuity of the sample collector. This report shall not be reproduced except in full, without written approval of NVL Laboratories, Inc. It shall not be used to claim product endorsement by NVLAP or any other agency of the US Government



Bulk Asbestos Fibers Analysis By Polarized Light Microscopy

	Landau Associates				Batch #: 1704290.00
Address:	130 2nd Avenue South Edmonds, WA 98020			Clie	ent Project #: 001034.010.016 Date Received: 3/8/2017 Samples Received: 39
Attention:	Mr. Cody Johnson				Samples Analyzed: 33
Project Location:	Blaine Marina Inc.				Method: EPA/600/R-93/116 & EPA/600/M4-82-020
Layer 2 of 2	Description: Off-white soft mastic wit	th paint and	paper		
	Non-Fibrous Mate	erials:	Other Fibrous Materi	als:%	Asbestos Type: %
Masti	ic/Binder, Calcareous particles, Binder/	/Filler	Cellulose	27%	None Detected ND
	I	Paint			
Lab ID: 170219 Location: Blaine	· · · · · ·	VP1-1			
Layer 1 of 1	Description: Dark brown compressed	d fibrous ma	terial with paint		
	Non-Fibrous Mate	erials:	Other Fibrous Materi	als:%	Asbestos Type: %
	Binder/Filler, Wood flakes, I	Paint	Cellulose	54%	None Detected ND
			Wood fibers	31%	
Location: Blaine	Description: Black foamy material wit Non-Fibrous Mate Synthetic foam, I	erials:	Other Fibrous Materi Synthetic fibers	als:% 2%	Asbestos Type: % None Detected NE
Lab ID: 170219 Location: Blaine		VG2-1			
Layer 1 of 1	Description: White soft material with Non-Fibrous Mate	•	Other Fibrous Materi	ala:0/	Asbestos Type: %
	Caulking compound, Binder/Filler, I		Cellulose	3%	None Detected ND
Lab ID: 17021 Location: Blaine	975 Client Sample #: BMI-L				
Sampled by	/: Client /: Jacob Laugeson	Date : 03/	15/2017	<u> </u>	to the second se
Reviewed by	0	Date: 03/		Jick I v	Technical Director
Note: If samples are 600/R-93/116 and 60 20%=10-30%, 50%=/ limited by the metho	not homogeneous, then subsamples of the co 00/M4-82-020 Methods with the following measu 40-60%). This report relates only to the items tes odology and acuity of the sample collector. T shall not be used to claim product endorsement b	rement uncert sted. If sample This report sh	e analyzed separately. All t ainties for the reported % As was not collected by NVL p all not be reproduced exce	oulk samp sbestos (1 personnel, pt in full,	bles are analyzed using both EPA 1%=0-3%, 5%=1-9%, 10%=5-15%, then the accuracy of the results is without written approval of NVL



Bulk Asbestos Fibers Analysis

By Polarized Light Microscopy

	t: Landau Associates s: 130 2nd Avenue South	Clie	Batch #: 1704290.00 ent Project #: 001034.010.016
	Edmonds, WA 98020		Date Received: 3/8/2017 Samples Received: 39
	: Mr. Cody Johnson		Samples Analyzed: 33
Project Location	Elaine Marina Inc.		Method: EPA/600/R-93/116 & EPA/600/M4-82-020
Layer 1 of 2	Description: Tan soft mastic		
	Non-Fibrous Materials:	Other Fibrous Materials:%	Asbestos Type: %
	Mastic/Binder, Calcareous particles	Polyethylene fibers 4%	None Detected ND
Layer 2 of 2	Description: White crumbly compacted powde	ery material	
	Non-Fibrous Materials:	Other Fibrous Materials:%	Asbestos Type: %
	Calcareous particles, Calcareous binder	Cellulose 7%	None Detected ND
Lab ID: 17021	976 Client Sample #: BMI-P1-1 e Marina Inc.		
Location. Blain	Description: Silver paint		
	Description: Silver paint Non-Fibrous Materials:	Other Fibrous Materials:%	Asbestos Type: %
	Description: Silver paint	Other Fibrous Materials:% Cellulose 2%	Asbestos Type: % Chrysotile 4%
Layer 1 of 1 Lab ID: 17021	Description: Silver paint Non-Fibrous Materials: Metallic paint, Calcareous particles 977 Client Sample #: BMI-P2-1		
Layer 1 of 1 Lab ID: 17021 Location: Blain	Description: Silver paint Non-Fibrous Materials: Metallic paint, Calcareous particles 977 Client Sample #: BMI-P2-1 e Marina Inc.		
Layer 1 of 1 Lab ID: 17021	Description: Silver paint Non-Fibrous Materials: Metallic paint, Calcareous particles 977 Client Sample #: BMI-P2-1 e Marina Inc. Description: Silver thin flaky paint	Cellulose 2%	Chrysotile 4%
Layer 1 of 1 Lab ID: 17021 Location: Blain	Description: Silver paint Non-Fibrous Materials: Metallic paint, Calcareous particles 977 Client Sample #: BMI-P2-1 e Marina Inc. Description: Silver thin flaky paint Non-Fibrous Materials:	Cellulose 2% Other Fibrous Materials:%	Chrysotile 4% Asbestos Type: %
Layer 1 of 1 Lab ID: 17021 Location: Blain Layer 1 of 3	Description: Silver paint Non-Fibrous Materials: Metallic paint, Calcareous particles 977 Client Sample #: BMI-P2-1 e Marina Inc. Description: Silver thin flaky paint Non-Fibrous Materials: Metallic paint	Cellulose 2% Other Fibrous Materials:% None Detected ND	Chrysotile 4%
Layer 1 of 1 Lab ID: 17021 Location: Blain	Description: Silver paint Non-Fibrous Materials: Metallic paint, Calcareous particles 977 Client Sample #: BMI-P2-1 e Marina Inc. Description: Silver thin flaky paint Non-Fibrous Materials: Metallic paint Non-Fibrous Materials: Metallic paint Silver thin flaky paint Non-Fibrous Materials: Metallic paint Silver thin flaky paint Silver thin flaky paint Silver thin flaky paint Non-Fibrous Materials: Silver thin flaky paint Silver thin flaky Silver t	Cellulose 2% Other Fibrous Materials:% None Detected ND s elements and paint	Chrysotile 4% Asbestos Type: % None Detected ND
Layer 1 of 1 Lab ID: 17021 Location: Blain Layer 1 of 3	Description: Silver paint Non-Fibrous Materials: Metallic paint, Calcareous particles 977 Client Sample #: BMI-P2-1 e Marina Inc. Description: Silver thin flaky paint Non-Fibrous Materials: Metallic paint Description: Yellow brittle material with fibrous Non-Fibrous Materials:	Cellulose 2% Other Fibrous Materials:% None Detected ND s elements and paint Other Fibrous Materials:%	Chrysotile 4% Asbestos Type: % None Detected ND Asbestos Type: %
Layer 1 of 1 Lab ID: 17021 Location: Blain Layer 1 of 3 Layer 2 of 3	Description: Silver paint Non-Fibrous Materials: Metallic paint, Calcareous particles 977 Client Sample #: BMI-P2-1 e Marina Inc. Description: Silver thin flaky paint Non-Fibrous Materials: Metallic paint Description: Yellow brittle material with fibrous Non-Fibrous Materials: Resin/Binder, Binder/Filler, Paint	Cellulose 2% Other Fibrous Materials:% None Detected ND s elements and paint	Chrysotile 4% Asbestos Type: % None Detected ND
Layer 1 of 1 Lab ID: 17021 Location: Blain Layer 1 of 3	Description: Silver paint Non-Fibrous Materials: Metallic paint, Calcareous particles 977 Client Sample #: BMI-P2-1 e Marina Inc. Description: Silver thin flaky paint Non-Fibrous Materials: Metallic paint Description: Yellow brittle material with fibrous Non-Fibrous Materials: Resin/Binder, Binder/Filler, Paint Description: Gray crumbly/brittle material	Cellulose 2% Other Fibrous Materials:% None Detected ND s elements and paint Other Fibrous Materials:% Glass fibers 44%	Chrysotile 4% Asbestos Type: % None Detected ND Asbestos Type: % None Detected ND
Layer 1 of 1 Lab ID: 17021 Location: Blain Layer 1 of 3 Layer 2 of 3	Description: Silver paint Non-Fibrous Materials: Metallic paint, Calcareous particles 977 Client Sample #: BMI-P2-1 e Marina Inc. Description: Silver thin flaky paint Non-Fibrous Materials: Metallic paint Description: Yellow brittle material with fibrous Non-Fibrous Materials: Resin/Binder, Binder/Filler, Paint	Cellulose 2% Other Fibrous Materials:% None Detected ND s elements and paint Other Fibrous Materials:%	Chrysotile 4% Asbestos Type: % None Detected ND Asbestos Type: %

Lab ID: 17021978 Client Sample #: BMI-GA1-1

Location: Blaine Marina Inc.

Sampled by: Client		An free
Analyzed by: Jacob Laugeson	Date: 03/15/2017	
Reviewed by: Nick Ly	Date: 03/16/2017	Nick Ly, Technical Director

Note: If samples are not homogeneous, then subsamples of the components were analyzed separately. All bulk samples are analyzed using both EPA 600/R-93/116 and 600/M4-82-020 Methods with the following measurement uncertainties for the reported % Asbestos (1%=0-3%, 5%=1-9%, 10%=5-15%, 20%=10-30%, 50%=40-60%). This report relates only to the items tested. If sample was not collected by NVL personnel, then the accuracy of the results is limited by the methodology and acuity of the sample collector. This report shall not be reproduced except in full, without written approval of NVL Laboratories, Inc. It shall not be used to claim product endorsement by NVLAP or any other agency of the US Government

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Bulk Asbestos Fibers Analysis

By Polarized Light Microscopy

Batch #: 1704290.00	Clier	: Landau Associates : 130 2nd Avenue South	
Date Received: 3/8/201		Edmonds, WA 98020	
Samples Received: 3			• · · · ·
Samples Analyzed: 3		Mr. Cody Johnson	
Method: EPA/600/R-93/11 & EPA/600/M4-82-02		Blaine Marina Inc.	Project Location
	elements and paint	Description: Black brittle material with fibrous	Layer 1 of 1
Asbestos Type: %	Other Fibrous Materials:%	Non-Fibrous Materials:	
Chrysotile 23%	Cellulose 3%	Binder/Filler, Calcareous binder, Paint	
		979 Client Sample #: BMI-GA2-1	Lab ID: 17021
		•	Location: Blaine
	paint	Description: Black rubbery material with trace	Layer 1 of 1
		New Tikesus Meteriales	
Asbestos Type: %	Other Fibrous Materials:%	Non-Fibrous Materials:	
Asbestos Type: % None Detected NE	None Detected ND	Rubber/Binder, Paint980Client Sample #: BMI-GA3-1e Marina Inc.	Location: Blaine
	None Detected ND al Other Fibrous Materials:%	Rubber/Binder, Paint 980 Client Sample #: BMI-GA3-1 e Marina Inc. Description: Gray compressed fibrous material Non-Fibrous Materials:	Lab ID: 17021 Location: Blaine Layer 1 of 1
None Detected NE	None Detected ND	Rubber/Binder, Paint 980 Client Sample #: BMI-GA3-1 e Marina Inc. Description: Gray compressed fibrous materia Non-Fibrous Materials: Binder/Filler, Calcareous particles	Location: Blaine Layer 1 of 1
None Detected NE	None Detected ND al Other Fibrous Materials:%	Rubber/Binder, Paint 980 Client Sample #: BMI-GA3-1 e Marina Inc. Description: Gray compressed fibrous materia Non-Fibrous Materials: Binder/Filler, Calcareous particles 981 Client Sample #: BMI-RM1-1	Location: Blaine Layer 1 of 1 Lab ID: 17021
None Detected NE	None Detected ND al Other Fibrous Materials:%	Rubber/Binder, Paint 980 Client Sample #: BMI-GA3-1 e Marina Inc. Description: Gray compressed fibrous materials: Non-Fibrous Materials: Binder/Filler, Calcareous particles 981 Client Sample #: BMI-RM1-1 e Marina Inc.	Location: Blaine Layer 1 of 1 Lab ID: 17021 Location: Blaine
None Detected NE Asbestos Type: % None Detected NE	None Detected ND al Other Fibrous Materials:%	Rubber/Binder, Paint 980 Client Sample #: BMI-GA3-1 e Marina Inc. Description: Gray compressed fibrous materia Non-Fibrous Materials: Binder/Filler, Calcareous particles 981 Client Sample #: BMI-RM1-1	Location: Blaine Layer 1 of 1 Lab ID: 17021
None Detected NE	None Detected ND Al Other Fibrous Materials:% Cellulose 82% Other Fibrous Materials:%	Rubber/Binder, Paint 980 Client Sample #: BMI-GA3-1 e Marina Inc. Description: Gray compressed fibrous material Non-Fibrous Materials: Binder/Filler, Calcareous particles 981 Client Sample #: BMI-RM1-1 e Marina Inc. Description: Black asphaltic built-up material Non-Fibrous Materials:	Location: Blaine Layer 1 of 1 Lab ID: 17021 Location: Blaine Layer 1 of 4
None Detected NE Asbestos Type: % None Detected NE	None Detected ND al Other Fibrous Materials:% Cellulose 82%	Rubber/Binder, Paint 980 Client Sample #: BMI-GA3-1 e Marina Inc. Description: Gray compressed fibrous materials: Non-Fibrous Materials: Binder/Filler, Calcareous particles 981 Client Sample #: BMI-RM1-1 e Marina Inc. Description: Black asphaltic built-up material Non-Fibrous Materials: halt/Binder, Binder/Filler, Calcareous binder	Location: Blaine Layer 1 of 1 Lab ID: 17021 Location: Blaine Layer 1 of 4 Asp
None Detected NE Asbestos Type: % None Detected NE Asbestos Type: % None Detected NE	Al Other Fibrous Materials:% Cellulose 82% Other Fibrous Materials:% Synthetic fibers 27%	Rubber/Binder, Paint 980 Client Sample #: BMI-GA3-1 e Marina Inc. Description: Gray compressed fibrous materials: Non-Fibrous Materials: Binder/Filler, Calcareous particles 981 Client Sample #: BMI-RM1-1 e Marina Inc. Description: Black asphaltic built-up material Non-Fibrous Materials: is Marina Inc. Description: Black asphaltic built-up material Non-Fibrous Materials: is Matt/Binder, Binder/Filler, Calcareous binder Description: Black asphaltic built-up material	Location: Blaine Layer 1 of 1 Lab ID: 17021 Location: Blaine Layer 1 of 4
None Detected NE Asbestos Type: % None Detected NE	None Detected ND Al Other Fibrous Materials:% Cellulose 82% Other Fibrous Materials:% Synthetic fibers 27% Other Fibrous Materials:%	Rubber/Binder, Paint 980 Client Sample #: BMI-GA3-1 e Marina Inc. Description: Gray compressed fibrous materials: Non-Fibrous Materials: Binder/Filler, Calcareous particles 981 Client Sample #: BMI-RM1-1 e Marina Inc. Description: Black asphaltic built-up material Non-Fibrous Materials: uhalt/Binder, Binder/Filler, Calcareous binder Description: Black asphaltic built-up material Non-Fibrous Materials:	Location: Blaine Layer 1 of 1 Lab ID: 17021 Location: Blaine Layer 1 of 4 Asp Layer 2 of 4
None Detected NE Asbestos Type: % None Detected NE Asbestos Type: % None Detected NE Asbestos Type: %	Al Other Fibrous Materials:% Cellulose 82% Other Fibrous Materials:% Synthetic fibers 27%	Rubber/Binder, Paint 980 Client Sample #: BMI-GA3-1 e Marina Inc. Description: Gray compressed fibrous materials: Non-Fibrous Materials: Binder/Filler, Calcareous particles 981 Client Sample #: BMI-RM1-1 e Marina Inc. Description: Black asphaltic built-up material Non-Fibrous Materials: ohalt/Binder, Binder/Filler, Calcareous binder Description: Black asphaltic built-up material Non-Fibrous Materials: ohalt/Binder, Binder/Filler, Calcareous binder bescription: Black asphaltic built-up material Non-Fibrous Materials:	Location: Blain Layer 1 of 1 Lab ID: 17021 Location: Blain Layer 1 of 4 Asp Layer 2 of 4
None Detected NE Asbestos Type: % None Detected NE Asbestos Type: % None Detected NE Asbestos Type: %	None Detected ND Al Other Fibrous Materials:% Cellulose 82% Other Fibrous Materials:% Synthetic fibers 27% Other Fibrous Materials:%	Rubber/Binder, Paint 980 Client Sample #: BMI-GA3-1 e Marina Inc. Description: Gray compressed fibrous materials: Non-Fibrous Materials: Binder/Filler, Calcareous particles 981 Client Sample #: BMI-RM1-1 e Marina Inc. Description: Black asphaltic built-up material Non-Fibrous Materials: uhalt/Binder, Binder/Filler, Calcareous binder Description: Black asphaltic built-up material Non-Fibrous Materials:	Location: Blain Layer 1 of 1 Lab ID: 17021 Location: Blain Layer 1 of 4 Asp Layer 2 of 4 Asp

 Sampled by: Client
 Analyzed by: Jacob Laugeson
 Date: 03/15/2017
 Image: 03/15/2017

 Reviewed by: Nick Ly
 Date: 03/16/2017
 Nick Ly, Technical Director

 Note: If samples are not homogeneous, then subsamples of the components were analyzed separately. All bulk samples are analyzed using both EPA 600/R-93/116 and 600/M4-82-020 Methods with the following measurement uncertainties for the reported % Asbestos (1%=0-3%, 5%=1-9%, 10%=5-15%)

600/R-93/116 and 600/M4-82-020 Methods with the following measurement uncertainties for the reported % Asbestos (1%=0-3%, 5%=1-9%, 10%=5-15%, 20%=10-30%, 50%=40-60%). This report relates only to the items tested. If sample was not collected by NVL personnel, then the accuracy of the results is limited by the methodology and acuity of the sample collector. This report shall not be reproduced except in full, without written approval of NVL Laboratories, Inc. It shall not be used to claim product endorsement by NVLAP or any other agency of the US Government

Analyzed by: Jacob Laugeson



Bulk Asbestos Fibers Analysis

By Polarized Light Microscopy

	t: Landau Associates s: 130 2nd Avenue South Edmonds, WA 98020	Clie	Batch #: 1704290.00 ent Project #: 001034.010.016 Date Received: 3/8/2017 Samples Received: 39
	n: Mr. Cody Johnson n: Blaine Marina Inc.		Samples Analyzed: 33 Method: EPA/600/R-93/116 & EPA/600/M4-82-020
Layer 4 of 4	Description: Black asphaltic fibrous layered m	aterial	
	Non-Fibrous Materials:	Other Fibrous Materials:%	Asbestos Type: %
	Asphalt/Binder, Binder/Filler	Glass fibers 84%	None Detected ND
Lab ID: 17021 Location: Blain	•		
Layer 1 of 3	Description: Black asphaltic fibrous material w	vith granules	
	Non-Fibrous Materials:	Other Fibrous Materials:%	Asbestos Type: %
	Asphalt/Binder, Binder/Filler, Granules	Glass fibers 31%	None Detected ND
		Cellulose 12%	
Layer 2 of 3	Description: Black asphaltic material		
	Non-Fibrous Materials:	Other Fibrous Materials:%	Asbestos Type: %
	Asphalt/Binder, Binder/Filler	Glass fibers 43%	None Detected ND
Layer 3 of 3	Description: Black asphaltic fibrous layered m	aterial	
	Non-Fibrous Materials:	Other Fibrous Materials:%	Asbestos Type: %
	Asphalt/Binder, Binder/Filler	Glass fibers 74%	None Detected ND
Lab ID: 17021	•		
Layer 1 of 2	Description: Red fibrous carpet material with	gray mastic and mesh	
	Non-Fibrous Materials:	Other Fibrous Materials:%	Asbestos Type: %
	Synthetic/Binder, Mastic/Binder	Synthetic fibers 89%	None Detected ND
Layer 2 of 2	Description: Tan soft mastic		
	Non-Fibrous Materials:	Other Fibrous Materials:%	Asbestos Type: %
	Mastic/Binder, Calcareous particles	Synthetic fibers 4%	None Detected ND
Lab ID: 17021 Location: Blain	•		
Sampled b	y: Client	Ç	Satura .

 Reviewed by: Nick Ly
 Date: 03/16/2017
 Nick Ly, Technical Director

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Date: 03/15/2017



Bulk Asbestos Fibers Analysis By Polarized Light Microscopy

Client	:: Landau Associates		Batch #: 1704290.00
Address	: 130 2nd Avenue South Edmonds, WA 98020	Clier	nt Project #: 001034.010.016 Date Received: 3/8/2017 Samples Received: 39
Attention	: Mr. Cody Johnson		Samples Analyzed: 33
Project Location	¹ Blaine Marina Inc.		Method: EPA/600/R-93/116 & EPA/600/M4-82-020
Layer 1 of 2	Description: Gray fibrous carpet material with	gray mastic and mesh	
	Non-Fibrous Materials:	Other Fibrous Materials:%	Asbestos Type: %
	Synthetic/Binder, Mastic/Binder	Synthetic fibers 86%	None Detected ND
Layer 2 of 2	Description: Trace tan soft mastic		
	Non-Fibrous Materials:	Other Fibrous Materials:%	Asbestos Type: %
	Mastic/Binder, Calcareous particles	Synthetic fibers 7%	None Detected ND
Lab ID: 17021 Location: Blain			
Layer 1 of 2	Description: Gray/multi-colored fibrous carpet	t material with gray mastic and me	sh
	Non-Fibrous Materials:	Other Fibrous Materials:%	Asbestos Type: %
	Synthetic/Binder, Mastic/Binder	Synthetic fibers 90%	None Detected ND
Layer 2 of 2	Description: Tan soft mastic		
	Non-Fibrous Materials:	Other Fibrous Materials:%	Asbestos Type: %
	Mastic/Binder, Calcareous particles	Synthetic fibers 5%	None Detected ND
Lab ID: 17021 Location: Blain	•		
Layer 1 of 3	Description: Brown fibrous carpet material wit	th gray mastic and mesh	
	Non-Fibrous Materials:	Other Fibrous Materials:%	Asbestos Type: %
	Synthetic/Binder, Mastic/Binder	Synthetic fibers 87%	None Detected ND
Layer 2 of 3	Description: Tan soft mastic		
	Non-Fibrous Materials:	Other Fibrous Materials:%	Asbestos Type: %
	Mastic/Binder, Calcareous particles	Synthetic fibers 4%	None Detected ND
Layer 3 of 3	Description: White crumbly material		
	Non-Fibrous Materials:	Other Fibrous Materials:%	Asbestos Type: %
Calcareo	us binder, Binder/Filler, Calcareous particles	Cellulose 8%	None Detected ND
Sampled b	y: Client	Ó	
-	-	03/15/2017	alles a
Reviewed b	-	03/16/2017 Nick Ly, T	Fechnical Director

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Bulk Asbestos Fibers Analysis

By Polarized Light Microscopy

Client: Landau Associates Address: 130 2nd Avenue South Edmonds, WA 98020

Attention: Mr. Cody Johnson

Project Location: Blaine Marina Inc.

Analyzed by: Jacob Laugeson

Reviewed by: Nick Ly

Client Project #: 001034.010.016 Date Received: 3/8/2017 Samples Received: 39 Samples Analyzed: 33 Method: EPA/600/R-93/116 & EPA/600/M4-82-020

Nick Ly, Technical Director

Batch #: 1704290.00

Lab ID: 17021	•		
Location: Blaine			
Layer 1 of 3	Description: White vinyl tile		
	Non-Fibrous Materials:	Other Fibrous Materials:%	Asbestos Type: %
	Vinyl/Binder, Binder/Filler	None Detected ND	None Detected ND
Layer 2 of 3	Description: Black asphaltic mastic		
	Non-Fibrous Materials:	Other Fibrous Materials:%	Asbestos Type: %
Mastic/	Binder, Asphalt/Binder, Calcareous particles	Cellulose 5%	None Detected ND
Layer 3 of 3	Description: Brown woody material		
	Non-Fibrous Materials:	Other Fibrous Materials:%	Asbestos Type: %
V	/ood flakes, Binder/Filler, Calcareous binder	Wood fibers 74%	None Detected ND
Lab ID: 17021	988 Client Sample #: BMI-VFT2-1		
Location: Blaine	•		
Layer 1 of 2	Description: Tan vinyl tile		
	Non-Fibrous Materials:	Other Fibrous Materials:%	Asbestos Type: %
	Vinyl/Binder, Binder/Filler	Cellulose 2%	Chrysotile 4%
Layer 2 of 2	Description: Tan soft mastic		-
2	Non-Fibrous Materials:	Other Fibrous Materials:%	Asbestos Type: %
Mastic/Bind	der, Calcareous particles, Calcareous binder	Cellulose 6%	None Detected ND
Lab ID: 17021	989 Client Sample #: BMI-VFT3-1		
Location: Blain	•		
Layer 1 of 2	Description: Gray vinyl tile		
	Non-Fibrous Materials:	Other Fibrous Materials:%	Asbestos Type: %
	Vinyl/Binder, Binder/Filler, Fine grains	Cellulose 4%	None Detected ND
Sampled by	v: Client		

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Date: 03/15/2017

Date: 03/16/2017



Bulk Asbestos Fibers Analysis By Polarized Light Microscopy

	ssociates					Batch	າ #: 1704290.00
130 2nd A	venue South				Clier	nt Project	#: 001034.010.016
Edmonds,	WA 98020					Date I	Received: 3/8/2017
							nples Received: 39
-							nples Analyzed: 33
3laine Ma	rina Inc.						EPA/600/R-93/116 PA/600/M4-82-020
Descripti	on: Tan soft mastic						
	Non-Fibrous Ma	terials:	Other Fibro	ous Materia	als:%	As	bestos Type: %
r, Calcare	eous particles, Calcareous	binder		Cellulose	5%	Ν	lone Detected ND
90	Client Sample #: BMI-	VFT4-1					
Marina In	С.						
Descripti	on: Gray vinyl tile						
	Non-Fibrous Ma	terials:	Other Fibro	ous Materia	als:%	As	bestos Type: %
Vinyl	/Binder, Binder/Filler, Fine	grains		Cellulose	3%	Ν	lone Detected ND
Descripti	on: Tan soft mastic						
	Non-Fibrous Ma	terials:	Other Fibro	ous Materia	als:%	As	bestos Type: %
er, Calcare	eous particles, Calcareous	binder		Cellulose	3%	Ν	lone Detected ND
91	Client Sample #: BMI	TX1-1					
Marina Ind	С.						
ample wa	s dried prior to analysis.						
Descripti	on: White lumpy foamy ma	aterial with p	aint				
	Non-Fibrous Ma	terials:	Other Fibro	ous Materia	als:%	As	bestos Type: %
Calcared	ous binder, Synthetic foam	, Paint		Cellulose	5%		
				Cellulose	J /0		Chrysotile 5%
92	Client Sample #: BMI	·TX1-2			nple St	atus:	Not Analyzed
92 93	-			San			-
	Blaine Ma Descripti r, Calcare 90 Marina In Descripti Vinyl Descripti r, Calcare 91 Marina In Marina In	r, Calcareous particles, Calcareous 20 Client Sample #: BMI- Marina Inc. Description: Gray vinyl tile Non-Fibrous Mar Vinyl/Binder, Binder/Filler, Fine Description: Tan soft mastic Non-Fibrous Mar r, Calcareous particles, Calcareous 21 Client Sample #: BMI- Marina Inc. ample was dried prior to analysis. Description: White lumpy foamy market	Blaine Marina Inc. Description: Tan soft mastic Non-Fibrous Materials: r, Calcareous particles, Calcareous binder Client Sample #: BMI-VFT4-1 Marina Inc. Description: Gray vinyl tile Non-Fibrous Materials: Vinyl/Binder, Binder/Filler, Fine grains Description: Tan soft mastic Non-Fibrous Materials: r, Calcareous particles, Calcareous binder Client Sample #: BMI-TX1-1 Marina Inc. ample was dried prior to analysis.	Blaine Marina Inc. Description: Tan soft mastic Non-Fibrous Materials: Other Fibro r, Calcareous particles, Calcareous binder Other Fibro O Client Sample #: BMI-VFT4-1 Marina Inc. Description: Gray vinyl tile Non-Fibrous Materials: Other Fibro Vinyl/Binder, Binder/Filler, Fine grains Other Fibro Description: Tan soft mastic Non-Fibrous Materials: Non-Fibrous Materials: Other Fibro Yinyl/Binder, Binder/Filler, Fine grains Other Fibro Vinyl/Binder, Binder/Filler, Fine grains Other Fibro Yinyl/Binder, Binder/Filler, Fine grains Other Fibro Vinyl/Binder, Binder/Filler, Fine grains Other Fibro Vinyl/Binder, Binder/Filler, Fine grains Other Fibro Ying (Fibro Sample #: BMI-TX1-1) Other Fibro Ying (Fibro Sample #: BMI-TX1-1) Marina Inc. Ample was dried prior to analysis. Description: White lumpy foamy material with paint	Blaine Marina Inc. Description: Tan soft mastic Non-Fibrous Materials: Other Fibrous Materials: r, Calcareous particles, Calcareous binder Cellulose 20 Client Sample #: BMI-VFT4-1 Marina Inc. Description: Gray vinyl tile Non-Fibrous Materials: Other Fibrous Materials: Vinyl/Binder, Binder/Filler, Fine grains Cellulose Description: Tan soft mastic Non-Fibrous Materials: Non-Fibrous Materials: Other Fibrous Materials: r, Calcareous particles, Calcareous binder Cellulose 21 Client Sample #: BMI-TX1-1 Marina Inc. ample was dried prior to analysis. Description: White lumpy foamy material with paint	Blaine Marina Inc. Description: Tan soft mastic Non-Fibrous Materials: Other Fibrous Materials: r, Calcareous particles, Calcareous binder Cellulose 5% O Client Sample #: BMI-VFT4-1 Marina Inc. Description: Gray vinyl tile Non-Fibrous Materials: Other Fibrous Materials: Vinyl/Binder, Binder/Filler, Fine grains Cellulose 3% Description: Tan soft mastic Non-Fibrous Materials: Other Fibrous Materials:% r, Calcareous particles, Calcareous binder Cellulose System 3% Description: Tan soft mastic Other Fibrous Materials:% r, Calcareous particles, Calcareous binder Cellulose Of Client Sample #: BMI-TX1-1 Marina Inc. ample was dried prior to analysis. Description: White lumpy foamy material with paint	Mr. Cody Johnson Sar Blaine Marina Inc. Method: Blaine Marina Inc. & E Description: Tan soft mastic & Sar Non-Fibrous Materials: Other Fibrous Materials:% As r, Calcareous particles, Calcareous binder Cellulose 5% N 20 Client Sample #: BMI-VFT4-1 Marina Inc. As Description: Gray vinyl tile Non-Fibrous Materials: Other Fibrous Materials:% As Vinyl/Binder, Binder/Filler, Fine grains Cellulose 3% N Description: Tan soft mastic Non-Fibrous Materials: Other Fibrous Materials:% As r, Calcareous particles, Calcareous binder Cellulose 3% N Description: Tan soft mastic Non-Fibrous Materials: Other Fibrous Materials:% As r, Calcareous particles, Calcareous binder Cellulose 3% N 21 Client Sample #: BMI-TX1-1 Marina Inc. ample was dried prior to analysis. Bescription: White lumpy foamy material with paint

600/R-93/116 and 600/M4-82-020 Methods with the following measurement uncertainties for the reported % Asbestos (1%=0-3%, 5%=1-9%, 10%=5-15%, 20%=10-30%, 50%=40-60%). This report relates only to the items tested. If sample was not collected by NVL personnel, then the accuracy of the results is limited by the methodology and acuity of the sample collector. This report shall not be reproduced except in full, without written approval of NVL Laboratories, Inc. It shall not be used to claim product endorsement by NVLAP or any other agency of the US Government



Bulk Asbestos Fibers Analysis By Polarized Light Microscopy

	: 130 2nd	Associates I Avenue South Is, WA 98020		Client Pro	atch #: 1704290.00 ject #: 001034.010.016 ate Received: 3/8/2017 Samples Received: 39
Attention	· Mr Coc	ly Johnson			Samples Analyzed: 33
Project Location		-			od: EPA/600/R-93/116 & EPA/600/M4-82-020
Lab ID: 17021	995	Client Sample #: BMI-TX1-5		Sample Status:	Not Analyzed
Lab ID: 17021	996	Client Sample #: BMI-TX1-6		Sample Status:	Not Analyzed
Lab ID: 17021	997	Client Sample #: BMI-TX1-7		Sample Status:	Not Analyzed
Lab ID: 17021		Client Sample #: BMI-DW1-1 Inc.			
Layer 1 of 3	Descri	ption: White compacted powdery ma	terial with paint		
		Non-Fibrous Materials:	Other Fibrous Ma	terials:%	Asbestos Type: %
		Calcareous particles, Perlite, Paint	None Detect	ed ND	None Detected ND
Layer 2 of 3	Descri	ption: White compacted powdery ma	terial with paper		
		Non-Fibrous Materials:	Other Fibrous Ma	terials:%	Asbestos Type: %
	Calcar	eous particles, Perlite, Binder/Filler	Cellulo	se 31%	None Detected ND
Layer 3 of 3	Descri	ption: White chalky material with pap	ber		
		Non-Fibrous Materials:	Other Fibrous Ma	terials:%	Asbestos Type: %
		Gypsum/Binder, Binder/Filler	Cellulo	se 27%	None Detected ND
Lab ID: 17021 Location: Blain	e Marina		torial with paint		
Layer 1 of 3	Descri	ption: White compacted powdery ma Non-Fibrous Materials:	Other Fibrous Ma	toriala:0/	Asbestos Type: %
		Calcareous particles, Perlite, Paint	None Detect		None Detected ND
			None Delete		
Sampled b	-			ant	
Analyzed b Reviewed b		-	e:03/15/2017 e:03/16/2017	Nick Ly, Techn	
		geneous, then subsamples of the componen)

Note: If samples are not homogeneous, then subsamples of the components were analyzed separately. All bulk samples are analyzed using both EPA 600/R-93/116 and 600/M4-82-020 Methods with the following measurement uncertainties for the reported % Asbestos (1%=0-3%, 5%=1-9%, 10%=5-15%, 20%=10-30%, 50%=40-60%). This report relates only to the items tested. If sample was not collected by NVL personnel, then the accuracy of the results is limited by the methodology and acuity of the sample collector. This report shall not be reproduced except in full, without written approval of NVL Laboratories, Inc. It shall not be used to claim product endorsement by NVLAP or any other agency of the US Government

Analyzed by: Jacob Laugeson

Reviewed by: Nick Ly



Bulk Asbestos Fibers Analysis

By Polarized Light Microscopy

	nt: Landau Associates s: 130 2nd Avenue South Edmonds, WA 98020	Clie	Batch #: 1704290.00 ent Project #: 001034.010.016 Date Received: 3/8/2017
			Samples Received: 39
	n: Mr. Cody Johnson		Samples Analyzed: 33
Project Location	n: Blaine Marina Inc.		Method: EPA/600/R-93/116 & EPA/600/M4-82-020
Layer 2 of 3	Description: White compacted powdery materia	al with paper	
	Non-Fibrous Materials:	Other Fibrous Materials:%	Asbestos Type: %
	Calcareous particles, Perlite, Binder/Filler	Cellulose 33%	None Detected ND
Layer 3 of 3	Description: White chalky material with paper		
	Non-Fibrous Materials:	Other Fibrous Materials:%	Asbestos Type: %
	Gypsum/Binder, Binder/Filler	Cellulose 26%	None Detected ND
Lab ID: 1702	2000 Client Sample #: BMI-DW1-3		
Location: Blair	ne Marina Inc.		
Layer 1 of 3	Description: White compacted powdery materia	al with paint	
	Non-Fibrous Materials:	Other Fibrous Materials:%	Asbestos Type: %
	Calcareous particles, Perlite, Paint	None Detected ND	None Detected ND
Layer 2 of 3	Description: White compacted powdery materia	al with paper	
	Non-Fibrous Materials:	Other Fibrous Materials:%	Asbestos Type: %
	Calcareous particles, Perlite, Binder/Filler	Cellulose 32%	None Detected ND
Layer 3 of 3	Description: White chalky material with paper		
	Non-Fibrous Materials:	Other Fibrous Materials:%	Asbestos Type: %
	Gypsum/Binder, Binder/Filler	Cellulose 25%	None Detected ND
Lab ID: 1702	2001 Client Sample #: BMI-DW2-1		
Location: Blair	ne Marina Inc.		
Comments:	Composite result (per client request) for whole sar	mple is less than 1% asbestos.	
Layer 1 of 2	Description: White compacted powdery materia	al with paint	
	Non-Fibrous Materials:	Other Fibrous Materials:%	Asbestos Type: %
C	alcareous particles, Calcareous binder, Paint	Cellulose 4%	Chrysotile 2%
Sampled b	by: Client	Ģ	Intern

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Date: 03/15/2017 Date: 03/16/2017

Nick Ly, Technical Director



Bulk Asbestos Fibers Analysis By Polarized Light Microscopy

	t: Landau Associates				Batch #: 1704290.00
Address	: 130 2nd Avenue South Edmonds, WA 98020			Cilei	nt Project #: 001034.010.016 Date Received: 3/8/2017 Samples Received: 39
Attention	: Mr. Cody Johnson				Samples Analyzed: 33
	^{1:} Blaine Marina Inc.				Method: EPA/600/R-93/116 & EPA/600/M4-82-020
Layer 2 of 2	Description: White chalky mater	rial with paper			
	Non-Fibrous	Materials: Oth	er Fibrous Mater	als:%	Asbestos Type: %
	Gypsum/Binder, Bi	nder/Filler	Cellulose	27%	None Detected ND
Lab ID: 17022	•	MI-DW2-2			
Layer 1 of 2	Description: White compacted p	owdery material with r	aint		
	Non-Fibrous		er Fibrous Materi	ale %	Asbestos Type: %
C	alcareous particles, Calcareous bin		Cellulose		Chrysotile <1%
Layer 2 of 2	Description: White chalky mater		Cellulose	J /0	
	Non-Fibrous		er Fibrous Mater	als [.] %	Asbestos Type: %
	Gypsum/Binder, Bi		Cellulose		None Detected ND
	e Marina Inc. Composite result (per client reque	st) for whole sample is	less than 1% asl	pestos.	
Layer 1 of 2	Description: White compacted p				
	Non-Fibrous		er Fibrous Mater		Asbestos Type: %
	alcareous particles, Calcareous bin		Cellulose	5%	Chrysotile 2%
Layer 2 of 2	Description: White chalky mater				A - b 4 T 0/
	Non-Fibrous		er Fibrous Materi Cellulose		Asbestos Type: % None Detected ND
	Gypsum/Binder, Bi		Cellulose	20%	
	004 Client Completty R				
Lab ID: 17022	•	MI-DW2-4			
Location: Blain	e Marina Inc.				
	e Marina Inc. Description: White compacted p	oowdery material	er Fibrous Materi	als:%	Asbestos Type: %
Location: Blain	e Marina Inc.	oowdery material Materials: Oth	er Fibrous Mater None Detected	als:% ND	Asbestos Type: % None Detected ND
Location: Blain Layer 1 of 2	e Marina Inc. Description: White compacted p Non-Fibrous Calcareous particles, Pe	oowdery material Materials: Oth			
Location: Blain Layer 1 of 2 Sampled b	e Marina Inc. Description: White compacted p Non-Fibrous Calcareous particles, Pe	oowdery material Materials: Oth	None Detected		

600/R-93/116 and 600/M4-82-020 Methods with the following measurement uncertainties for the reported % Asbestos (1%=0-3%, 5%=1-9%, 10%=5-15%, 20%=10-30%, 50%=40-60%). This report relates only to the items tested. If sample was not collected by NVL personnel, then the accuracy of the results is limited by the methodology and acuity of the sample collector. This report shall not be reproduced except in full, without written approval of NVL Laboratories, Inc. It shall not be used to claim product endorsement by NVLAP or any other agency of the US Government



Bulk Asbestos Fibers Analysis By Polarized Light Microscopy

Client	: Landau Associates		Batch #: 1704290.00	
Address	: 130 2nd Avenue South	Client Project #: 001034.010.016		
	Edmonds, WA 98020		Date Received: 3/8/2017	
			Samples Received: 39	
Attention	: Mr. Cody Johnson		Samples Analyzed: 33	
Project Location	: Blaine Marina Inc.		Method: EPA/600/R-93/116	
			& EPA/600/M4-82-020	
Layer 2 of 2	Description: White chalky material with paper			
	Non-Fibrous Materials:	Other Fibrous Materials:%	Asbestos Type: %	
	Gypsum/Binder, Binder/Filler	Cellulose 31%	None Detected ND	
Lab ID: 17022	005 Client Sample #: BMI-DW2-5			
Lab ID: 17022 Location: Blaine	•			
	•	and paint		
Location: Blaine	e Marina Inc.	and paint Other Fibrous Materials:%	Asbestos Type: %	
Location: Blaine	e Marina Inc. Description: White chalky material with paper a		Asbestos Type: % None Detected ND	
Location: Blaine	e Marina Inc. Description: White chalky material with paper a Non-Fibrous Materials: Gypsum/Binder, Binder/Filler, Paint	Other Fibrous Materials:%		
Location: Blaine Layer 1 of 1	e Marina Inc. Description: White chalky material with paper a Non-Fibrous Materials: Gypsum/Binder, Binder/Filler, Paint 006 Client Sample #: BMI-DW3-1	Other Fibrous Materials:%		
Location: Blaine Layer 1 of 1 Lab ID: 17022	e Marina Inc. Description: White chalky material with paper a Non-Fibrous Materials: Gypsum/Binder, Binder/Filler, Paint 006 Client Sample #: BMI-DW3-1	Other Fibrous Materials:%		
Location: Blaine Layer 1 of 1 Lab ID: 17022 Location: Blaine	e Marina Inc. Description: White chalky material with paper a Non-Fibrous Materials: Gypsum/Binder, Binder/Filler, Paint 006 Client Sample #: BMI-DW3-1 e Marina Inc.	Other Fibrous Materials:%		

Sampled by: Client		Anton
Analyzed by: Jacob Laugeson	Date: 03/15/2017	
Reviewed by: Nick Ly	Date: 03/16/2017	Nick Ly, Technical Director

Note: If samples are not homogeneous, then subsamples of the components were analyzed separately. All bulk samples are analyzed using both EPA 600/R-93/116 and 600/M4-82-020 Methods with the following measurement uncertainties for the reported % Asbestos (1%=0-3%, 5%=1-9%, 10%=5-15%, 20%=10-30%, 50%=40-60%). This report relates only to the items tested. If sample was not collected by NVL personnel, then the accuracy of the results is limited by the methodology and acuity of the sample collector. This report shall not be reproduced except in full, without written approval of NVL Laboratories, Inc. It shall not be used to claim product endorsement by NVLAP or any other agency of the US Government

ASBESTOS LABORATORY SERVICES

4708 Aurora Ave N, Seattle, WA 98103

NVL Laboratories, Inc.

p 206.547.0100 | f 206.634.1936 | www.nvllabs.com



Rush Samples _____

Company	Landau Associates	NVL Batch Number 1704290.00	
Address	130 2nd Avenue South	TAT 5 Days AH No	
	Edmonds, WA 98020	Rush TAT	
Project Manager	Mr. Cody Johnson	Due Date 3/15/2017 Time 4:50 PM	
Phone	(425) 778-0907	Email cjohnson@landauinc.com	
Cell	(206) 877-2173	Fax (425) 778-6409	

Project Name/Number: 001034.010.016

Project Location: Blaine Marina Inc.

Subcategory PLM Bulk

Item Code ASB-02

EPA 600/R-93-116 Asbestos by PLM <bulk>

Total Number of Samples 39

	Lab ID	Sample ID	Description	A/R
1	17021968	BMI-ACT1-1		Α
2	17021969	BMI-ACT2-1		Α
3	17021970	BMI-AD1-1		Α
4	17021971	BMI-CB1-1		Α
5	17021972	BMI-WP1-1		Α
6	17021973	BMI-WG1-1		Α
7	17021974	BMI-WG2-1		Α
8	17021975	BMI-LC1-1		Α
9	17021976	BMI-P1-1		Α
10	17021977	BMI-P2-1		Α
11	17021978	BMI-GA1-1		Α
12	17021979	BMI-GA2-1		Α
13	17021980	BMI-GA3-1		Α
14	17021981	BMI-RM1-1		Α
15	17021982	BMI-RM2-1		Α
16	17021983	BMI-CP1-1		Α
17	17021984	BMI-CP2-1		Α
18	17021985	BMI-CP3-1		Α

	Print Name	Signature	Company	Date	Time
Sampled by	Client				
Relinquished by	Client				
Office Use Only	Print Name	Signature	Company	Date	Time
Received by	Jacob Laugeson		NVL	3/8/17	1650
Analyzed by	Jacob Laugeson		NVL	3/15/17	
Results Called by					
Faxed Emailed					
Special Instructions:		•			

Date: 3/9/2017 Time: 11:22 AM Entered By: Sarah Khan

ASBESTOS LABORATORY SERVICES

4708 Aurora Ave N, Seattle, WA 98103

NVL Laboratories, Inc.

p 206.547.0100 | f 206.634.1936 | www.nvllabs.com



Rush Samples _____

Company	Landau Associates	NVL Batch I	Number	1704290.	00
Address	130 2nd Avenue South	TAT 5 Days			AH No
	Edmonds, WA 98020	Rush TAT			
Project Manager	Mr. Cody Johnson	Due Date	3/15/201	7 Time	4:50 PM
Phone	(425) 778-0907	Email cjohn	ison@lan	dauinc.com	
Cell	(206) 877-2173	Fax (425)	778-6409	9	

Project Name/Number: 001034.010.016

Project Location: Blaine Marina Inc.

Subcategory PLM Bulk

Item Code ASB-02

EPA 600/R-93-116 Asbestos by PLM <bulk>

Total Number of Samples 39

		-		
	Lab ID	Sample ID	Description	A/R
19	17021986	BMI-CP4-1		А
20	17021987	BMI-VFT1-1		А
21	17021988	BMI-VFT2-1		Α
22	17021989	BMI-VFT3-1		А
23	17021990	BMI-VFT4-1		А
24	17021991	BMI-TX1-1	**Stop At First Positive	Α
25	17021992	BMI-TX1-2	**	А
26	17021993	BMI-TX1-3	**	А
27	17021994	BMI-TX1-4	**	А
28	17021995	BMI-TX1-5	**	А
29	17021996	BMI-TX1-6	**	А
30	17021997	BMI-TX1-7	**	А
31	17021998	BMI-DW1-1		А
32	17021999	BMI-DW1-2		А
33	17022000	BMI-DW1-3		Α
34	17022001	BMI-DW2-1	Composite per client JL	А
35	17022002	BMI-DW2-2		Α
36	17022003	BMI-DW2-3	Composite per client JL	Α

	Print Name	Signature	Company	Date	Time
Sampled by	Client				
Relinquished by	Client				
Office Use Only	Print Name	Signature	Company	Date	Time
Received by	Jacob Laugeson		NVL	3/8/17	1650
Analyzed by	Jacob Laugeson		NVL	3/15/17	
Results Called by					
Faxed Emailed					
Special Instructions:					

Date: 3/9/2017 Time: 11:22 AM Entered By: Sarah Khan

ASBESTOS LABORATORY SERVICES

4708 Aurora Ave N, Seattle, WA 98103

NVL Laboratories, Inc.

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Company	Landau Associates	NVL Batch Number 1704290.00			.00	
Address	130 2nd Avenue South	TAT 5 Days			AH No	
	Edmonds, WA 98020	Rush T	AT_			
Project Manager	Mr. Cody Johnson	Due Da	ate	3/15/2017	7 Time	4:50 PM
Phone	(425) 778-0907	Email (cjohn	son@land	auinc.com	
Cell	(206) 877-2173	Fax ((425)	778-6409		

Project Name/Number: 001034.010.016 Project Location: Blaine Marina Inc.

Subcategory PLM Bulk

Item Code ASB-02

EPA 600/R-93-116 Asbestos by PLM <bulk>

Total Number of Samples 39

Rush Samples

_	Lab ID	Sample ID	Description	A/R
37	17022004	BMI-DW2-4		Α
38	17022005	BMI-DW2-5		Α
39	17022006	BMI-DW3-1		Α

	Print Name	Signature	Company	Date	Time
Sampled by	Client				
Relinquished by	Client				
Office Use Only	Print Name	Signature	Company	Date	Time
Received by	Jacob Laugeson		NVL	3/8/17	1650
Analyzed by	Jacob Laugeson		NVL	3/15/17	
Results Called by					
Faxed Emailed					
Special					
Instructions:					

Date: 3/9/2017 Time: 11:22 AM Entered By: Sarah Khan

1	7	0	4	2	9	0
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		nent Training						
C		Landau Asso			Project Man	ager Cody Jo	ohnson	
	Address	130 2nd Ave.	S			Cell (206)	877 - 2173	
		Edmonds, W/	4		E	mail cjohnsc	n@landauin.co	om
	Phone					Fax ()	-	
Project	t Name/N	^{Jumber} 001034.0	10.016 Pro	oject Location RI	aine Ma	rina Inc		
□ F ☑ F	PCM Air PLM (EP PLM Gra	(NIOSH 7400) A 600/R-93-116)	 TEN EPA .16) Ast 	/ (NIOSH 7402) 400 Points (600 pestos in Vermico	□ TEM (AF)/R-93-116) ulite (EPA 600,	IERA)	TEM (EPA Level II M EPA 1000Points (60 Asbestos in Sedim	,
		structions						
a	Call () –	a	Fax ()	-	⊿ _{Email} _ cjc	hnson@landau	uin.com
Tota	l Nun	nber of Sample	s 39	0				
	Samp			Description				A/R
1		BMI-ACT1-1						
2		BMI-ACT2-1						
3		BMI-AD1-1		_				
4		BMI-CB1-1						
5		BMI-WP1-1						
6		BMI-WG1-1						
7		BMI-WG2-1						
8		BMI-LC1-1						
9		BMI-P1-1						
10		BMI-P2-1						
11		BMI-GA1-1						
12		BMI-GA2-1						
13		BMI-GA3-1						
14		BMI-RM1-1						
15		BMI-RM2-1						
		Print Name		Signature		Company	Date	Time
Samp	led by							
Relinqu		Coly John	su	LAP21	26	LAZ	3/81	17 1650
R A	e Use O eceived nalyzed Called d/Email	Print Name by Jacob L by by		Signature	×	Company M	Date 3.8. /	Time

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1	7	0	4	2	9	0
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H S E	A B S DUSTRIAL Y G I E N E R V I C E S	CI	SBESTOS HAIN OF CL	JSTODY	Turn Around T 1 Hour 2 Hours 4 Hours Please call	24 Hours	Days Days 10 Days
		andau Associate	S	Project Manage	Cody Joh	Inson	
		30 2nd Ave. S			(206)		
		dmonds, WA				@landauin.com	
[FIIONE			- Fax	< <u> </u>	-	
Project	Name/Numl	^{ber} 001034.010.0 ²	16 Project Location B	laine Marir	na Inc.		ч.
	LM (EPA 60 M Gravim	OSH 7400) (0) 00/R-93-116) (0) etry (600/R-93-116) (0) able/Non-Friable (EPA	 TEM (NIOSH 7402) EPA 400 Points (60 Asbestos in Vermic 600/R-93/116)) □ TEM (AHER)0/R-93-116) culite (EPA 600/R- □ Other	A)	EM (EPA Level II Mod PA 1000Points (600/F sbestos in Sediment	(-93-116)
) -			cioh	nson@landauin	com
L					☑ Email		
Total	Numbe	er of Samples	39				
	Sample II)	Description				A/R
1		BMI-CP1-1					
2		BMI-CP2-1					
3		BMI-CP3-1					
4		BMI-CP4-1					
5		BMI-VFT1-1					
6		BMI-VFT2-1					
7		BMI-VFT3-1					
8		BMI-VFT4-1					
9		BMI-TX1-1 BMI-TX1-2	Stop at first po	ositive in this series	3		
10		BMI-TX1-2 BMI-TX1-3					
12		BMI-TX1-4			2		
13		BMI-TX1-4 BMI-TX1-5					
14		BMI-TX1-6					
15		BMI-TX1-7					
		DIVII-1X1-7		×			
	PI	int Name	Signature		ompany	Date	Time
Sampl	ed by	-	-				
Relinqui	-	Cl Juhrs-	Q		LAZ	3/8/1-	1 1650
Office	Use Only	7	0	I	- U &		, , , -
Re	eceived by nalyzed by	Print Name Jawa	Signature		ompany M	Date 3.8.17	Time 1650
Faxed	Called by d/Email by						

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1	7	0	4	2	9	0
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н		NE		STOS IN OF CL	JSTODY	Turn Around 1 Hour 2 Hours 4 Hours Please cal	□ 24 Hours □ 2 Days	24 Rays 2 5 Days 10 Days Hours
Laboratory	/ Manage	ment Training						
(Company	Landau Ass	ociates		Project Mana	ger Cody Jo	hnson	
	Addres	130 2nd Ave	e. S		_	Cell (206)	877 - 2173	
		Edmonds, V	/A		Er	_{nail} cjohnsor	n@landauin.co	om
	Phone					-	-	
Projec	t Name/	Number 001034.	010.016 Pr	roject Location B	laine Mar	ina Inc.		
	PLM (EF PLM Gr Asbestc	r (NIOSH 7400) PA 600/R-93-116) avimetry (600/R-93 os Friable/Non-Friał nstructions	□ EP, -116) □ As ble (EPA 600/	A 400 Points (60 bestos in Vermic R-93/116)	0/R-93-116) culite (EPA 600/ □ Other		TEM (EPA Level II N EPA 1000Points (60 Asbestos in Sedime	
							nnson@landau	lin.com
L				11dX				
lota	I Nur	nber of Samp	les 39					
	Sam	ple ID		Description				A/R
1		BMI-DW1-	1					
2		BMI-DW1-2						
3		BMI-DW1-3						
		BMI-DW2-1			2			
		BMI-DW2-2						
6		BMI-DW2-						
		BMI-DW2-4						
8		BMI-DW2-5						
9		BMI-DW3-1						
10								
12								
13								
14 15								
		Print Name		Signature		Company	Date	Time
	led by	0.01		0-		1 4	310	17 110
Relinqu		Long Ju	130-	4 Dest		LAZ	7/8/	1/ 1650
R	eceived nalyzed Called d/Email	Print Name by Jacob L by by		Signature	4	Company ML	Date 3:8-1;	Time 7 1655

4708 Aurora Ave N, Seattle, WA 98103 | p 206.547.0100 | f 206.634.1936 | www.nvllabs.com



ASBESTOS CHAIN OF CUSTODY

Turn Around Time	
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ann a' cana mine		
🗅 1 Hour	24 Hours	🛛 4 Days
2 Hours	2 Days	🛛 5 Days
□ 4 Hours	3 Days	🗆 10 Days

Please call for TAT less than 24 Hours

Laboratory	Management	Training
Laboratory	munugement	manning

	ompany						
	Address	 					
	Phone	 	F	ax) –		
Project	Name/Number	Project Location					
□ P □ P	CM Air (NIOSH 7400) LM (EPA 600/R-93-116) LM Gravimetry (600/R-93-116) Sbestos Friable/Non-Friable (El	PA 400 Points (600 Asbestos in Vermicu	/R-93-116) Ilite (EPA 600/R	8-04/004)	EPA 1000Asbestos	Level II Modified Points (600/R-93- in Sediment (EPA	116)
Repo	orting Instructions						
	Call ()	 □ Fax ()	-	🗆 Email 🔄			
Total	Number of Samples	 					
	Sample ID	Description					A/R
1							
2							
3							
4							
5		 					
7							
8							
9							
10							
11							
12							
13							
14							
15							
	Print Name	Signature		Company		Date	Time

	Print Name	Signature	Company	Date	lime
Sampled by					
Relinquish by					

Office Use Only

-	Print Name	Signature	Company	Date	Time
Received by					
Analyzed by					
Called by					
Faxed/Email by					
. , , , , , , , , , , , , , , , , , , ,					

March 9, 2017

Cody Johnson Landau Associates 130 2nd Avenue South Edmonds, WA 98020



Laboratory | Management | Training

RE: Metals Analysis; NVL Batch # 1704254.00

Dear Mr. Johnson,

Enclosed please find the test results for samples submitted to our laboratory for analysis. Preparation of these samples was conducted following protocol outlined in EPA Method SW 846 -3051 unless stated otherwise. Analysis of these samples was performed using analytical instruments in accordance with U.S. EPA, NIOSH, OSHA and other ASTM methods.

For matrix materials submitted as paint, dust wipe, soil or TCLP samples, analysis for the presence of total metals is conducted using published U.S. EPA Methods. Paint and soil results are usually expressed in mg/Kg which is equivalent to parts per million (ppm). Lead (Pb) in paint is usually expressed in mg/Kg (ppm), Percent (%) or mg/cm² by area. Dust wipe sample results are usually expressed in ug/wipe and ug/ft². TCLP samples are reported in mg/L (ppm). For air filter samples, analyses are conducted using NIOSH and OSHA Methods. Results are expressed in ug/filter and ug/m³. Other matrix materials are analyzed accordingly using published methods or specified by client. The reported test results pertain only to items tested and are not blank corrected.

For recent regulation updates pertaining to current regulatory levels or permissible exposure levels, please call your local regulatory agencies for more details.

This report is considered highly confidential and will not be released without your approval. Samples are archived for two weeks following analysis. Samples that are not retrieved by the client are discarded after two weeks.

Thank you for using our laboratory services. if you need further assistance please feel free to call us at 206-547-0100 or 1-888-NVLLABS.

Sincerely,

Shalini Patel, Laboratory Analyst



NVL Laboratories, Inc. 4708 Aurora Ave N, Seattle, WA 98103 p 206.547.0100 | f 206.634.1936

1.888.NVL.LABS 1.888.(685.5227) www.nvllabs.com **NVL Laboratories, Inc.**

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Analysis Report

Total Lead (Pb)

Batch #: 1704254.00

Client: Landau Associates Address: 130 2nd Avenue South Edmonds, WA 98020

Attention: Mr. Cody Johnson Project Location: Blaine Marina Matrix: Paint Method: EPA 3051/7000B Client Project #: 001034.010.016 Date Received: 3/8/2017 Samples Received: 15 Samples Analyzed: 15

Lab ID	Client Sample #	Sample Weight (g)	RL in mg/Kg	Results in mg/Kg	Results in percent
17021825	BMI-LP-1	0.1801	56.0	< 56.0	< 0.0056
17021826	BMI-LP-2	0.1870	54.0	< 54.0	<0.0054
17021827	BMI-LP-3	0.0971	100.0	1400.0	0.1400
17021828	BMI-LP-4	0.1364	74.0	1400.0	0.1400
17021829	BMI-LP-5	0.0500	200.0	< 200.0	<0.0200
17021830	BMI-LP-6	0.0206	240.0	4900.0	0.4900
17021831	BMI-LP-7	0.2029	50.0	1400.0	0.1400
17021832	BMI-LP-8	0.1702	59.0	1400.0	0.1400
17021833	BMI-LP-9	0.0766	130.0	4400.0	0.4400
17021834	BMI-LP-10	0.1295	78.0	160.0	0.0160
17021835	BMI-LP-11	0.0640	160.0	690.0	0.0690
17021836	BMI-LP-12	0.0902	110.0	< 110.0	<0.0110
17021837	BMI-LP-13	0.1821	55.0	2600.0	0.2600
17021838	BMI-LP-14	0.0788	130.0	< 130.0	<0.0130
17021839	BMI-LP-15	0.0444	110.0	18000.0	1.8000

Comments: Small sample size (<0.05g) for BMI-LP-6 and -15.

Sampled by: Client		
Analyzed by: Yasuyuki Hida	Date Analyzed: 03/09/2017	Ann.
Reviewed by: Shalini Patel	Date Issued: 03/09/2017	Shalini Patel, Laboratory Analyst
mg/ Kg =Milligrams per kilogram		RL = Reporting Limit
Percent = Milligrams per kilogram	'<' = Below the reporting Limit	
Note : Method QC results are account of the second	eptable unless stated otherwise. the condition of all samples was accep	table at time of receipt.

Bench Run No: 2017-0309-3

NVL Laboratories, Inc.

4708 Aurora Ave N, Seattle, WA 98103

p 206.547.0100 | f 206.634.1936 | www.nvllabs.com

LEAD LABORATORY SERVICES



Rush Samples _____

Company	Landau Associates	NVL Batch	h Nı	umber	17	04254	.00
Address	130 2nd Avenue South	TAT 5 D	ays	3			AH No
	Edmonds, WA 98020	Rush TAT					
Project Manager	Mr. Cody Johnson	Due Date		3/15/20)17	Time	4:50 PM
Phone	(425) 778-0907	Email cjol	hns	son@la	ndau	linc.com	
Cell	(206) 877-2173	Fax (42	25)7	778-64	09		

Project Name/Number: 001034.010.016	Project Location: Blaine Marina
-------------------------------------	---------------------------------

Subcategory Flame AA (FAA)

Item Code FAA-02 EPA 7000B Lead by FAA <paint>

Total Number of Samples 15

Lab ID Sample ID Description A/R 17021825 BMI-LP-1 1 А 2 17021826 BMI-LP-2 А 17021827 BMI-LP-3 3 А 4 17021828 BMI-LP-4 А 5 17021829 BMI-LP-5 А 6 17021830 BMI-LP-6 А 7 17021831 BMI-LP-7 А 8 17021832 BMI-LP-8 А 9 17021833 BMI-LP-9 А 10 17021834 BMI-LP-10 А 11 17021835 BMI-LP-11 А 12 17021836 BMI-LP-12 А 13 17021837 BMI-LP-13 А 14 17021838 BMI-LP-14 А 15 17021839 BMI-LP-15 А

	Print Name	Signature	Company	Date	Time
Sampled by	Client				
Relinquished by	Client				
Office Use Only	Print Name	Signature	Company	Date	Time
Received by	Jacob Laugeson		NVL	3/8/17	1650
Analyzed by	Yasuyuki Hida		NVL	3/9/17	
Results Called by					
Faxed Emailed					
Special Instructions:					

Date: 3/9/2017 Time: 8:09 AM Entered By: Mohammed Jamal



METALS CHAIN OF CUSTODY

Turn Around Time		
🖾 2 Hour	🗅 4 Hours	⊒ 24 ⊦
2 Days	🗆 3 Days	🗆 4 Da
🖾 5 Days	🕒 6-10 Days	
Please call for T	AT less than 24	Hours

Hours ays

		_		-		-	-	-		
Labora	toŋ	1	۴	vlan	age	eme	ent	I	Training	J

Company Address	Landau Associates, Inc. 130 2nd Ave. S. Edmonds, WA 98020			0 2nd Ave. S.		Cody Johnson Cell (206) 877 - 2173 Email cjohnson@landauinc.com		
Phone	ī				Fax ()	*	
Project Name/N	lumber 00103	4.010.016	Project Location B	aine Ma	rina		_	
Total Metals	ZI FAA (ppm	🗅 Air Filter	🛛 Paint Chips (%)	🗆 Soil 📔 F	RCRA 8			RCRA 11
TCLP	LICP (PPM	🗆 Paint Chips (d	m) 🛛 Dust Wipes	C) Barium	🗆 Chromium	🗅 Silver	□ Copper
	🗆 GFAA (ppb)	Drinking Wat	er 🛛 Waste Water	C	Arsenic	C Mercury	2) Lead	□ Zinc
	🛈 CVAA (ppb)	🗅 Othe <u>r</u>			Selenium	🗆 Cadmium		Other

-

Reporting Instructions

🗆 Call 📒

🗀 Fax 🌔

)

Lemail cjohnson@landauinc.com

Total Number of Samples 23

)

	Sample ID	Description	A/R
1	BMI-LP-1		
2	BMI-LP-2		
3	BMI-LP-3		
4	BMI-LP-4		
5	BMI-LP-5		
6	BMI-LP-6		
7	BMI-LP-7		
8	BMI-LP-8		
9	BMI-LP-9		
10	BMI-LP-10		
11	BMI-LP-11		
12	BMI-LP-12		
13	BMI-LP-13		
14	BMI-LP-14		
15	BMI-LP-15		

	Print Name	Signature	Company	Date	Time
Sampled by		\bigcirc			
Relinquish by	Cody Johnson	as	LAI	3/8/2017	1650

Office Use Only

	Print Name	Signature 🖌 👖	Company	Date	Time
Received by	Jawb L	MA	m	3.8.17	1650
Analyzed by					
Called by					
Faxed/Email by					

March 10, 2017

Cody Johnson Landau Associates 130 2nd Avenue South Edmonds, WA 98020



Laboratory | Management | Training

RE: Metals Analysis; NVL Batch # 1704257.00

Dear Mr. Johnson,

Enclosed please find the test results for samples submitted to our laboratory for analysis. Preparation of these samples was conducted following protocol outlined in EPA Method SW 846 -3051 unless stated otherwise. Analysis of these samples was performed using analytical instruments in accordance with U.S. EPA, NIOSH, OSHA and other ASTM methods.

For matrix materials submitted as paint, dust wipe, soil or TCLP samples, analysis for the presence of total metals is conducted using published U.S. EPA Methods. Paint and soil results are usually expressed in mg/Kg which is equivalent to parts per million (ppm). Lead (Pb) in paint is usually expressed in mg/Kg (ppm), Percent (%) or mg/cm² by area. Dust wipe sample results are usually expressed in ug/wipe and ug/ft². TCLP samples are reported in mg/L (ppm). For air filter samples, analyses are conducted using NIOSH and OSHA Methods. Results are expressed in ug/filter and ug/m³. Other matrix materials are analyzed accordingly using published methods or specified by client. The reported test results pertain only to items tested and are not blank corrected.

For recent regulation updates pertaining to current regulatory levels or permissible exposure levels, please call your local regulatory agencies for more details.

This report is considered highly confidential and will not be released without your approval. Samples are archived for two weeks following analysis. Samples that are not retrieved by the client are discarded after two weeks.

Thank you for using our laboratory services. if you need further assistance please feel free to call us at 206-547-0100 or 1-888-NVLLABS.

Sincerely,

Nick Ly, Technical Director

1.888.NVL.LABS 1.888.(685.5227) www.nvllabs.com



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Analysis Report

Total Lead (Pb)

Batch #: 1704257.00

Matrix: Paint Method: EPA 3051/7000B Client Project #: 001034.010.016 Date Received: 3/8/2017 Samples Received: 8 Samples Analyzed: 8

Client: Landau Associates Address: 130 2nd Avenue South Edmonds, WA 98020

Attention: Mr. Cody Johnson Project Location: Blaine Marina

Lab ID	Client Sample #	Sample Weight (g)	RL in mg/Kg	Results in mg/Kg	Results in percent	
17021843	BMI-LP-16	0.1801	55.0	2300.0	0.2300	
17021844	BMI-LP-17	0.2038	49.0	< 49.0	<0.0049	
17021845	BMI-LP-18	0.1898	52.0	720.0	0.0720	
17021846	BMI-LP-19	0.1447	68.0	1300.0	0.1300	
17021847	BMI-LP-20	0.1924	52.0	12000.0	1.2000	
17021848	BMI-LP-21	0.1245	80.0	< 80.0	<0.0080	
17021849	BMI-LP-22	0.1933	51.0	82.0	0.0082	
17021850	BMI-LP-23	0.1967	50.0	14000.0	1.4000	

Sampled by: Client Analyzed by: Yasuyuki Hida Reviewed by: Nick Ly	Date Analyzed: 03/10/2017 Date Issued: 03/10/2017	Nick Ly, Technical Director
mg/ Kg =Milligrams per kilogram Percent = Milligrams per kilogram / Note : Method QC results are acce		RL = Reporting Limit '<' = Below the reporting Limit

Unless otherwise indicated, the condition of all samples was acceptable at time of receipt.

NVL Laboratories, Inc.

4708 Aurora Ave N, Seattle, WA 98103

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LEAD LABORATORY SERVICES



Rush Samples _____

Company	Landau Associates	NVL Batcl	h Nı	umber	17	04257.	.00
Address	130 2nd Avenue South	TAT 5 D	ays	3			AH No
	Edmonds, WA 98020	Rush TAT	「				
Project Manager	Mr. Cody Johnson	Due Date		3/15/20	17	Time	4:50 PM
Phone	(425) 778-0907	Email cjo	hns	on@lar	ndau	inc.com	
Cell	(206) 877-2173	Fax (42	25)7	778-640)9		

Project Name/Number: 001034.010.016	Project Location: Blaine Marina
-------------------------------------	---------------------------------

Subcategory Flame AA (FAA)

Item Code FAA-02 EPA 7000B Lead by FAA <paint>

Total Number of Samples 8

Lab ID Sample ID Description A/R 1 17021843 BMI-LP-16 А 2 17021844 BMI-LP-17 А 3 17021845 BMI-LP-18 А 4 17021846 BMI-LP-19 А 5 17021847 BMI-LP-20 А 6 17021848 BMI-LP-21 А 7 17021849 BMI-LP-22 А 8 17021850 BMI-LP-23 А

	Print Name	Signature	Company	Date	Time
Sampled by	Client				
Relinquished by	Client				
Office Use Only	Print Name	Signature	Company	Date	Time
Received by	Jacob Laugeson		NVL	3/8/17	1650
Analyzed by	Yasuyuki Hida		NVL	3/10/17	
Results Called by					
Faxed Emailed					
Special Instructions:					

Date: 3/9/2017 Time: 8:23 AM Entered By: Mohammed Jamal

17042	57
-------	----

L A E INDUSTI H Y G I E S E R V I	NE	ALS N OF CU	STODY	2 Days 3	Days 🗆 4 5-10 Days	4 Hours Days
Addres	Landau Associates, In 130 2nd Ave. S. Edmonds, WA 98020		Er	ger <u>Cody Johnson</u> Cell <u>(206) 877 - 2</u> nail <u>cjohnson@land</u> Fax <u>() -</u>	auinc.com	
2 Total Metals	ICP (PPM ICP (PPM GFAA (ppb) Drinking Water	Paint Chips (%)Dust Wipes	C Soil RC	ITTCA IRA 8 Barium II Chromium II Si Arsenic II Mercury 외 Le Selenium II Cadmium		
Total Nur)) Fax ()	·	□ Email cjohnson@	jlandauinc.co	2000
1	BMI-LP-16					-
2	BMI-LP-17					
3	BMI-LP-18					
4	BMI-LP-19					
5	BMI-LP-20					
6	BMI-LP-21					
7	BMI-LP-22					
8	BMI-LP-23					
9						
10						
11						
12						
13						
14						
15						
Sampled by	Print Name	Signature		Company	Date	Time

Janpiculty					
Relinquish by	Cody Johnson	as	LAI	3/8/2017	1650
Office Use Only	Print Name	Signature 1	Company	Date	Time
Received by	Jacob L	M	m	3.8.17	1650
Analyzed by		11			
Called by					
Faxed/Email by					

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METALS **CHAIN OF CUSTODY**

Turn A	Around	Time
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🗅 2 Hour 4 Hours 24 Hours 🛛 3 Days 🗆 2 Days 🛛 4 Days 🗆 5 Days 🗆 6-10 Days Please call for TAT less than 24 Hours

Laboratory | Management | Training

Company				Project I	Manager			
Address					Cell ()	-	
					Email			
Phone					Fax ()	-	
Project Name/N	umber		Project Location					
Total Metals	🗆 FAA (ppm	🗅 Air Filter	Paint Chips (%)	🗆 Soil	RCRA 8			RCRA 11
TCLP	LICP (PPM	Paint Chips	(cm) 🛛 Dust Wipes		🗅 Barium	Chromium	Silver	Copper
	🛾 GFAA (ppb)	🗅 Drinking Wa	ater 🛛 Waste Water		🗅 Arsenic	□ Mercury	🗆 Lead	□ Zinc
	CVAA (ppb)	□ Othe <u>r</u>			🗅 Selenium	🗅 Cadmium		□ Other
Reporting In:	Reporting Instructions							
🗆 Call)	-	🗆 Fax ()	-	🗅 Ema	ail		

Total Number of Samples

	Sample ID	Description	A/R
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			

	Print Name	Signature	Company	Date	Time
Sampled by					
Relinquish by					

Office Use Only

,	Print Name	Signature	Company	Date	Time
Received by					
Analyzed by					
Called by					
Faxed/Email by					



METALS **CHAIN OF CUSTODY**

Turn A	Around	Time
--------	--------	------

🗅 2 Hour 4 Hours 24 Hours 🛛 3 Days 🗆 2 Days 🛛 4 Days 🗆 5 Days 🗆 6-10 Days Please call for TAT less than 24 Hours

Laboratory | Management | Training

Company				Project I	Manager			
Address					Cell ()	-	
					Email			
Phone					Fax ()	-	
Project Name/N	umber		Project Location					
Total Metals	🗆 FAA (ppm	🗅 Air Filter	Paint Chips (%)	🗆 Soil	RCRA 8			RCRA 11
TCLP	LICP (PPM	Paint Chips	(cm) 🛛 Dust Wipes		🗅 Barium	Chromium	Silver	Copper
	🛛 GFAA (ppb)	🗅 Drinking Wa	ater 🛛 Waste Water		🗅 Arsenic	□ Mercury	🗅 Lead	□ Zinc
	CVAA (ppb)	□ Othe <u>r</u>			🗅 Selenium	🗅 Cadmium		□ Other
Reporting In:	structions							
🗆 Call)	-	🗆 Fax ()	-	🗅 Ema	ail		

Total Number of Samples

	Sample ID	Description	A/R
1			
2			
3			
4			
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6			
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11			
12			
13			
14			
15			

	Print Name	Signature	Company	Date	Time
Sampled by					
Relinquish by					

Office Use Only

,	Print Name	Signature	Company	Date	Time
Received by					
Analyzed by					
Called by					
Faxed/Email by					
,					

March 15, 2017



Laboratory | Management | Training

Mr. Cody Johnson

Landau Associates 130 2nd Avenue South Edmonds, WA 98020

Re: NVL Batch 1704262.00

Project Name/Number: 001034.010.016

Project location: Blaine Marina, Inc.

Dear Mr. Johnson,

Enclosed please find test results for samples submitted to our laboratory for analysis. Preparation and analysis of these samples were conducted in accordance with published industry standards and methods specified on the attached analytical report.

The content of this package consists of the following:

-Case Narrative & Definition of Data Qualifiers -Analytical Test Results -Applicable QC Summary -Client Chain-of-Custody (CoC) -NVL Receiving Record

The report is considered highly confidential and will not be released without your approval. Samples are archived for two weeks following analysis. Samples that are not retrieved by the client will be discarded after two weeks.

Thank you for using our laboratory services. If you need further assistance, please contact us at 206-547-0100 or 1-888-NVLLABS.

Sincerely,



Nick Ly, Technical Director

Enclosure: Sample Results



Case Narrative:

The following summarizes samples received on date as shown on the accompanied Chain of custody by NVL Laboratories, Inc. from Landau Associates for Project number: 001034.010.016. Samples were logged in for PCB analysis per client request using both customer sample ID's and laboratory assigned ID's as listed on the Chain-of-Custody (CoC). All samples as received were processed and analyzed within specified turnaround time without any abnormalities and deviations that may affect the analytical results. All quality control requirements were acceptable unless stated otherwise. The conditions of all samples were acceptable at time of receipt and all samples submitted with this batch were analyzed unless stated otherwise on the CoC.

Test Results are reported based on dry weight in milligram per kilograms (mg/kg) for PCB samples as shown on the analytical reports.



Definition Appendix

Terms

% Rec	Percent recovery.
<	Below Reporting Limit(RL) or Limit of Quantitation(LoQ) of the instrument.
В	Blank contamination. The recorded results is associated with a contaminated blank.
DF	Dilution Factor
J	The reported concentration is an estimated value because something may be present in the sample that interfered with the analysis.
J1	The reported concentration is an estimated value because the laboratory control sample (LCS) is out of control limits.
J2	The reported concentration is an estimated value because the percent recovery for matrix spike is out of control limits.
J3	The reported concentration is an estimated value because the relative percent difference(RPD) for duplicate analysis is out of control limits.
J4	Percent recovery is outside of established control limits.
LCS	Laboratory Control Sample.
LFS	Laboratory Fortified Spike
Limits	The upper and lower control limits for spike recoveries.
LN	Quality control sample is outside of control limits. This analyte was not detected in the sample.
LOQ	Limit of quantitation(same as RL)
mg/kg	Milligrams per kilogram.
ND	Analyte not detected or below the reporting limit of the instrument or methodology



Definition Appendix

Terms

РРМ	Parts per Million.
QC Batch Group	Quality Control Batch Group. The entity that links analytical results and supporting quality control results.
R	The data are not reliable due to possible contamination or loss of material during preparation or analysis. Re-sampling and reanalysis are necessary for verification.
RL	Reporting Limit. The minimum concentration that can be quantified under routine operating conditions.
RPD	Relative Percent Difference. The relative difference between duplicate results(matrix spike, blank spike, or samples duplicate) expressed as a percentage.
RPD Limit	The maximum RPD allowed for a set of duplicate measurements(see RPD).
SMI	Surrogate has matrix interference.
Spike Conc.	The measured concentration, in sample basis units, of a spiked sample.
SURR-ND	Surrogate was not detected due to matrix interference or dilution.
ug/m3	Micrograms per cubic meter.
ug/mL	Micrograms per milliliter
mg/Kg	milligram per kilogram
ANALYSIS REPORT



Polychlorinated Biphenyls by Gas Chromatography

Client SDG Number Date Reported Project Number Location	Landau Associates 1704262.00 03/15/2017 001034.010.016 Blaine Marina, Inc.	Samples Received*2Analyzed ByEvelyn AhuluSamples Analyzed*2Analysis Method8082APreparation Method3546PR (PCB)* for this test only	
Sample Numbe	er BMI-PCB-1	Received 03/08/2017	
Lab Sample ID	17021856	Matrix Material	
Initial Sample Siz	e 1.693 gm	Units of Result mg/Kg, as receiv	ed
Analyte		RL Final Result Analysi	
Aroclor-1016		1.2 < 1.2 03/09/20)17
Aroclor-1221		1.2 < 1.2 03/09/20	017
Aroclor-1232		1.2 < 1.2 03/09/20	017
Aroclor-1242		1.2 < 1.2 03/09/20	017
Aroclor-1248		1.2 < 1.2 03/09/20)17
Aroclor-1254		1.2 < 1.2 03/09/20)17
Aroclor-1260		1.2 < 1.2 03/09/20)17
PCBs, Total Comments: Paint comp	osite	1.2 <1.2	
Sample Numbe	er BMI-PCB-2	Received 03/08/2017	
Lab Sample ID	17021857	Matrix Material	
Initial Sample Siz	e 0.3823 gm	Units of Result mg/Kg, as receiv	ed
Analyte		RL Final Result Analysi	s Date
Aroclor-1016		5.2 < 5.2 03/09/20	017
Aroclor-1221		5.2 < 5.2 03/09/20	017
Aroclor-1232		5.2 < 5.2 03/09/20	017
Aroclor-1242		5.2 < 5.2 03/09/20	017
Aroclor-1248		5.2 < 5.2 03/09/20	017
Aroclor-1254		5.2 < 5.2 03/09/20	
Aroclor-1260		5.2 < 5.2 03/09/20)17
PCBs, Total	posite: Reporting limit raised due to small sar	5.2 <5.2	

Comments: Caulk composite; Reporting limit raised due to small sample size.



Quality Control Results

Project Number:	001034.010.016				umber: t Manager:		704262 ody John	ison		
QC Batch(es):	Q562			Analys	is Method:	808	2A			
QC Batch Method:	3546PR (PCB)			Analysis De	escription:		•	•	nenyls by Ga	IS
Preparation Date:	03/09/2017					Chr	omatogra	phy		
Blank: MBLK-17042	62									
	Blank				RL		Control			
Analyte	Result	Units	DF				Limit			Qualifiers
Aroclor-1016	ND	mg/Kg	1		1.0		1			
Aroclor-1221	ND	mg/Kg	1		1.0		1			
Aroclor-1232	ND	mg/Kg	1		1.0		1			
Aroclor-1242	ND	mg/Kg	1		1.0		1			
Aroclor-1248	ND	mg/Kg	1		1.0		1			
Aroclor-1254	ND	mg/Kg	1		1.0		1			
Aroclor-1260	ND	mg/Kg	1		1.0		1			
PCBs, Total	ND	mg/Kg	1		1.0		1			
Surrogates:			_			% Rec				
Tetrachloro-m-xylene			1			66	40-140			
Decachlorobiphenyl			1			85	40-140			
Lab Control Sample:	LCS-1254-17042	62								
	Blank Spike			Spike			% Rec			
Analyte	Result	Units	DF	Conc.		% Rec	Limits			Qualifiers
Aroclor-1254	18.6	mg/Kg	1	20.0		93	40-140			
Surrogates:										
Tetrachloro-m-xylene			1 1			64 84	40-140 40-140			
Decachlorobiphenyl			1			04	40-140			
Lab Control Sample:										
Lab Control Sample	Duplicate: LCS D	up-170426	2							
	Blank Spike			Spike						
Analyte	Result	Units	DF	Conc.		% Rec	Limits	RPD	RPD Limit	Qualifiers
Aroclor-1016	15.6	mg/Kg	1	20.0		78	40-140			
Ana alam 1000	13.7			20.0		69	40-140	13	50	
Aroclor-1260	20.1 17.1	mg/Kg	1	20.0 20.0		100 85	40-140 40-140	16	50	
Surrogates:				20.0		00	10 140	10	00	
Tetrachloro-m-xylene			1			68	40-140			
						71	40-140			
Decachlorobiphenyl			1			92	40-140			
						86	40-140			



Surrogate Recovery Summary Report

ClientLandau AssociatesProject001034.010.016

SDG Number <u>1704262</u>

· · · · · · · · · · · · · · · · · · ·				
Customer Sample ID	Lab Sample ID	Analyte	Recovery	Limits
BMI-PCB-1	17021856	Decachlorobiphenyl	96%	40-140
BMI-PCB-1	17021856	Tetrachloro-m-xylene	90%	40-140
BMI-PCB-2	17021857	Decachlorobiphenyl	100%	40-140
BMI-PCB-2	17021857	Tetrachloro-m-xylene	89%	40-140
LCS Dup-1704262	LCS Dup-1704262	Decachlorobiphenyl	86%	40-140
LCS Dup-1704262	LCS Dup-1704262	Tetrachloro-m-xylene	71%	40-140
LCS-1016+1260-1704262	LCS-1016+1260-1704262	Decachlorobiphenyl	92%	40-140
LCS-1016+1260-1704262	LCS-1016+1260-1704262	Tetrachloro-m-xylene	68%	40-140
LCS-1254-1704262	LCS-1254-1704262	Decachlorobiphenyl	84%	40-140
LCS-1254-1704262	LCS-1254-1704262	Tetrachloro-m-xylene	64%	40-140
MBLK-1704262	MBLK-1704262	Decachlorobiphenyl	85%	40-140
MBLK-1704262	MBLK-1704262	Tetrachloro-m-xylene	66%	40-140

* Recovery outside limits



INITIAL AND CONTINUING CALIBRATION VERIFICATION

SDG No: <u>1704262</u>

Contract:

Determination: 8082 PCB Aroclors <Material>

Run	Sample	Source	Analyzed	Analyte	True	Found	Unit	% Rec	Limits
R000555	CCV1 1016-1260	PCB_2016-1-2	03/09/2017	Aroclor-1016	5	5	ug/mL	100	80-120
		PCB_2016-1-2	03/09/2017	Aroclor-1260	5	5	ug/mL	100	80-120
	CCV1 1254	PCB_2016-1-3	03/09/2017	Aroclor-1254	5	5	ug/mL	100	80-120
	ICV 1016-1254- 1260	PCB_2016-1-4	03/09/2017	Aroclor-1016	5	4.442	ug/mL	89	85-115
		PCB_2016-1-4	03/09/2017	Aroclor-1254	5	5.564	ug/mL	111	85-115
		PCB_2016-1-4	03/09/2017	Aroclor-1260	5	5.223	ug/mL	104	85-115
	CCV2 1016-1260	PCB_2016-1-2	03/09/2017	Aroclor-1016	5	5.215	ug/mL	104	80-120
		PCB_2016-1-2	03/09/2017	Aroclor-1260	5	5.392	ug/mL	108	80-120
	CCV2 1254	PCB_2016-1-3	03/09/2017	Aroclor-1254	5	5.127	ug/mL	103	80-120

^{* =} Percent recovery not within control limits

ORGANICS LABORATORY SERVICES



Company	Landau Associates	NVL B	atch N	lumber	170426	52.00	
Address	130 2nd Avenue South	TAT \$	5 Day	s		AH No	
	Edmonds, WA 98020	Rush 1	TAT				
Project Manager	Mr. Cody Johnson	Due Da	ate	3/15/201	7 Time	4:50 PM	
Phone	(425) 778-0907	Email	cjohn	son@land	dauinc.co	m	
Cell	(206) 877-2173	Fax	(425)	778-6409)		

Project Name/Number: 001034.010.016 Project Location: Blaine Marina Inc.

Subcategory Quantitative analysis

Item Code ORG-05

Method 8082 PCB Aroclors <Bulk>

Total Number of Samples 2

Rush Samples _____

	Lab ID	Sample ID	Description	A/R
1	17021856	BMI-PCB-1		A
2	17021857	BMI-PCB-2		A

	Print Name	Signature	Company	Date	Time
Sampled by	Client				
Relinquished by	Client				
Office Use Only	Print Name	Signature	Company	Date	Time
Received by	Jacob Laugeson		NVL	3/8/17	1650
Analyzed by	Erelyn Ahnly	Eah	NVL	3/9/17-	16:00
Results Called by					
🗌 Faxed 🔲 Emailed					
Special					
Entered By: Mohammed Ja	imal Di	ate: 3/9/2017	Time: 9:17 AM		1 of 1
470 Page 9 of 10	8 Aurora Ave North, Seattle	e, WA 98103 p 206.547.0100	f 206.634.1936 www.	.nvllabs.com	

17	704	26	2
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L IN H S	A B S NDUSTRIAL YGIENE ERVICES	PCB'S CHAIN	OF CUSTO	DY	Turn A Please call for TA	□ 24 Hours	4 Days 5 Days 10 Days
	Address 130 2 Edm	[。] lau Associate 2nd Ave. S. onds, WA		Cell Email		-2173 landauinc.cor	n
Projec	PC	01034.010.016 B's in Air B's in Wipe	PC	Laine Mar CB in Bulk CB in Liquid	<u>ina, Inc.</u>		
L o	Call ()	F Samples 2	□ Fax ()	~	⊴ _{Email} cjohnsc	on@landauino	c.com
	Sample ID		Description				A/R
1	BN	/II-PCB-1	Paint comp	osite			
2	BI	MI-PCB-2	Caulk compo	site			
3							
4							
5	1						
6							
7							
8							
9							
10							
11							
12							
13							
14 15							
	Print Na	me	Signature	Co	mpany	Date	Time
ं Sampl	led by		0				
Relinqu	ish by Co	dy Johnson	14		LAI	3/8/2017	1650
Re		tName 206 L Iyn Ahnln	Signature	Co	nipany MUL	Date 3-8-17 3/9/17	Time 1650 16:00

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L A B INDUSTRIA H Y G I E N S E R V I C E	CHAIN C	OF CUSTODY		24 Hours 4 2 Days 5 3 Days 10	Days Days 0 Days
Laboratory Managemer	nt Training				
Company _		Project Mar	ager		
Address _			Cell () -		
-			Email		
Phone			Fax () -		
Project Name/Nu	mber	Project Location			
l	D PCB's in Air	PCB in Bulk			
	PCB's in Wipe	PCB in Liquid			
🗆 Call () -	□ Fax () -	_ 🗆 Email		
Total Num	per of Samples				
Sample	e ID	Description			A/R
1					
2					
4					
5					
6					
7					
8					
10					
11					
12					
13					
14					
15					
	Print Name	Signature	Company	Date	Time
Sampled by					
Relinquish by					
Office Use Onl	Print Name	Signature	Company	Date	Time
Received by					
Analyzed by Called by					

Faxed/Email by

March 15, 2017

Cody Johnson Landau Associates 130 2nd Avenue South Edmonds, WA 98020



Laboratory | Management | Training

RE: Metals Analysis; NVL Batch # 1704252.00

Dear Mr. Johnson,

Enclosed please find the test results for samples submitted to our laboratory for analysis. Preparation of these samples was conducted following protocol outlined in EPA Method SW 846 -3051 unless stated otherwise. Analysis of these samples was performed using analytical instruments in accordance with U.S. EPA, NIOSH, OSHA and other ASTM methods.

For matrix materials submitted as paint, dust wipe, soil or TCLP samples, analysis for the presence of total metals is conducted using published U.S. EPA Methods. Paint and soil results are usually expressed in mg/Kg which is equivalent to parts per million (ppm). Lead (Pb) in paint is usually expressed in mg/Kg (ppm), Percent (%) or mg/cm² by area. Dust wipe sample results are usually expressed in ug/wipe and ug/ft². TCLP samples are reported in mg/L (ppm). For air filter samples, analyses are conducted using NIOSH and OSHA Methods. Results are expressed in ug/filter and ug/m³. Other matrix materials are analyzed accordingly using published methods or specified by client. The reported test results pertain only to items tested and are not blank corrected.

For recent regulation updates pertaining to current regulatory levels or permissible exposure levels, please call your local regulatory agencies for more details.

This report is considered highly confidential and will not be released without your approval. Samples are archived for two weeks following analysis. Samples that are not retrieved by the client are discarded after two weeks.

Thank you for using our laboratory services. if you need further assistance please feel free to call us at 206-547-0100 or 1-888-NVLLABS.

Sincerely,

Nick Ly, Technical Director

1.888.NVL.LABS 1.888.(685.5227) www.nvllabs.com



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4708 Aurora Ave N, Seattle, WA 98103 p 206.547.0100 | f 206.634.1936 | www.nvllabs.com



Analysis Report Toxicity Characteristic Leaching Procedure - Lead (Pb)

Client: Landau Associates	Batch #: 1704252.00
Address: 130 2nd Avenue South	Matrix: Bulk
Edmonds, WA 98020	Method: EPA 1311/7000B
	Client Project #: 001034.010.016
Attention: Mr. Cody Johnson	Date Received: 3/8/2017
Project Location: Blaine Marina	Samples Received: 1
• • • • • •	Samples Analyzed: 1

		RL	Results	Results in	
Lab ID	Client Sample #	mg/ L	in mg/L	ppm	
17021823	BMI-TCLP-1	0.5	< 0.5	< 0.5	

Sampled by: Client Analyzed by: Yasuyuki Hida Reviewed by: Nick Ly	Date Analyzed: 03/15/2017 Date Issued: 03/15/2017	Nick Ly, Technical Director				
mg/ L =Milligrams per liter ppm = parts per million		RL = Reporting Limit '<' = Below the reporting Limit				
Note : Method QC results are acceptable unless stated otherwise. Unless otherwise indicated, the condition of all samples was acceptable at time of receipt.						
Bench Run No: 2017-0314-8	page 2 of 4	·				

NVL Laboratories, Inc.

4708 Aurora Ave N, Seattle, WA 98103

p 206.547.0100 | f 206.634.1936 | www.nvllabs.com

LEAD LABORATORY SERVICES



Company	Landau Associates	NVL B	atch I	Number	17	04252.	00
Address	130 2nd Avenue South	TAT §	5 Day	/s			AH No
	Edmonds, WA 98020	Rush 1					
Project Manager	Mr. Cody Johnson	Due Da	ate	3/15/20)17	Time	4:50 PM
Phone	(425) 778-0907	Email	cjohn	ison@la	ndau	inc.com	
Cell	(206) 877-2173	Fax	(425)	778-64	09		

Project Name/Number: 001034.010.016	Project Location: Blaine Marina

Subcategory Flame AA (FAA)

Item Code TCLP-1 EPA 1311/7000B Lead by FAA <TCLP>

То	tal Number	of Samples1	Rush Samples	
	Lab ID	Sample ID	Description	A/R
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APPENDIX C

Geotechnical Conditions and Sheetpile Design Reports

Geotechnical Engineering Services Blaine Marina Fuel Pier Bulkhead Replacement Bellingham, Washington

April 6, 2012

Prepared for

Port of Bellingham 1801 Roeder Avenue, Suite 146 Bellingham, Washington 98225



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APPENDICES

Appendix Title

- Α
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INTRODUCTION

This report summarizes the results of geotechnical engineering services conducted for the Port of Bellingham's (Port) proposed Blaine Marina Fuel Pier Bulkhead Replacement project in Blaine, Washington. The general project location is shown on the Vicinity Map (Figure 1). The general configuration of the project site and some of the existing site features are shown on the Site and Exploration Plan (Figure 2).

This report has been prepared based on our discussions with representatives of the Port, Reid Middleton, Inc. (Reid Middleton), and Wilson Engineering, LLC (Wilson Engineering); a recent base map of the project area prepared by Wilson Engineering; data collected during our geotechnical field exploration and laboratory testing programs; our review of subsurface information previously collected for other environmental and geotechnical projects in the area; and our experience on similar projects.

PROJECT BACKGROUND

The Blaine Marina fuel pier bulkhead is located along the western side of Sigurdson Avenue, as shown on Figure 2. The existing bulkhead retains approximately 7 to 9 feet (ft) of soil adjacent to a pile-supported fuel office building and fuel pier, located immediately to the west. Segments of the existing timber pile and lagging bulkhead display obvious signs of deflection, shearing, and other indications of advanced structural distress. Several sinkholes and areas of collapsing pavement are present behind much of the failing bulkhead segment that abuts the fuel pier. To the south and north of the fuel pier, riprap slope armor is present in front of the bulkhead, and the bulkhead does not appear to be distressed in these areas. The Port intends to construct an approximately 66-ft-long replacement bulkhead behind the failing bulkhead using cantilevered steel sheetpiles.

The fuel pier is used for vessel refueling operations and includes diesel and gasoline supply lines originating from three aboveground storage tanks (ASTs) located about 120 ft east of the failing bulkhead. Petroleum hydrocarbon contamination is known to have impacted shallow soils and groundwater around the ASTs, as discussed in the draft Interim Action Plan (Landau Associates 2012).

SCOPE OF SERVICES

The purpose of our geotechnical engineering services was to provide Reid Middleton and the Port with information related to subsurface conditions along the replacement bulkhead alignment and to provide geotechnical engineering parameters and recommendations to support design of the proposed replacement bulkhead. Our geotechnical engineering scope of services was provided in general accordance with the terms of a Professional Services Agreement between the Port and Landau Associates, dated October 13, 2011. Our geotechnical engineering scope of services included the following specific tasks:

- Collecting and reviewing readily available geotechnical and geologic data for the project area
- Coordinating the location of underground utilities prior to performing field activities
- Advancing three exploratory borings near the existing failing timber bulkhead
- Logging each soil unit observed in the exploratory borings and recording pertinent information, including soil sample depths, stratigraphy, soil characteristics, and depth to groundwater
- Conducting a limited laboratory testing program
- Performing certain engineering analyses and developing geotechnical engineering conclusions and recommendations to support design of the replacement bulkhead
- Preparing and submitting this written geotechnical engineering report summarizing our findings and geotechnical engineering conclusions and recommendations. This report includes:
 - A site plan showing the locations of subsurface explorations completed for this and certain previous studies in the project area
 - Descriptive logs of our borings and the results of geotechnical and analytical laboratory testing that was conducted on selected samples obtained from our explorations
 - A summary of subsurface soil and groundwater conditions anticipated along the planned alignment of the replacement bulkhead
 - Recommendations for active earth pressures (including surcharge and seismic earth pressures) acting behind the wall and passive earth pressures acting in front of the wall
 - Recommendations for bulkhead embedment depth that may be needed to satisfy global stability of the new wall constructed in the unconsolidated fill and marine deposits that are present in the project area
 - A discussion of constructability issues, including sheetpile driving and penetration
 - Recommended geotechnical monitoring and testing during construction.

SITE CONDITIONS

This section discusses the general geologic setting of the project area and describes the surface and subsurface conditions observed in the vicinity of the project site at the time of our field investigation. Interpretations of the site conditions are based on the results of our review of available information, and the results of our site reconnaissance, subsurface exploration, and laboratory testing programs.

GENERAL GEOLOGIC CONDITIONS

General geologic information for the project area was obtained from the *Geologic Map of the Bellingham 1:100,00 Quadrangle, Washington* (Lapen 2000), published by the Washington Division of Geology and Earth Resources. According to Lapen, fill that overlies glaciomarine drift is present in the project area. Glaciomarine drift can have various distributions of gravel, sand, silt, and clay; however, finer sediments (silt and clay with fine sand) are most typical, with coarse sand and gravel occurring as "dropstones."

Glaciomarine drift in the project area is typically soft or loose, although where exposed to drying or other consolidation after deposition, it can form a hardened crust several feet in thickness. We did not observe this crust in our explorations. The soils encountered in our subsurface explorations generally conform to the mapped geology, although an interval of silty sand encountered during drilling (described below) may be of glaciomarine origin, or it may be unmapped marine deposits that overlie the glaciomarine drift. For the purposes of this report, this interval of silty sand is referred to as marine deposits.

SURFACE CONDITIONS

The general configuration of the existing timber bulkhead, fuel office building, and fuel pier is shown on Figure 2. The ground surface behind the existing fuel pier bulkhead contains sinkholes and collapsed pavement that extends horizontally about 3 to 4 ft behind (east of) the bulkhead. This condition reduces the usable width of Sigurdson Avenue and could compromise the integrity of numerous buried utilities located near the project area. We observed sinkholes about 2 ft deep with suspended electrical and communication conduits spanning these areas. We understand that "hard-piped" fuel lines have been recently replaced by flexible fuel hoses using the existing pipes as sleeves to facilitate installation. A concrete block and wire-rope barricade directs vehicular and pedestrian traffic around the area of collapsing pavement. Based upon a comparison of the extent of collapsed pavement between late last year and the time of our subsurface exploration program on January 5, 2012, it appears that the extent of the collapsed pavement behind the bulkhead has expanded to the south.

The impacted bulkhead consists of distorted timber lagging restrained by timber piles that support the eastward edge of the fuel pier and fuel office. Many of these piles show relatively large distortions and tilting, or are sheared. Beyond both ends of the failed portions of the timber bulkhead, which extend beyond the project area, fill consisting of riprap and boulders is in place on the water side of (i.e., west of) the bulkhead. Where protected by this fill, the bulkhead appears to be intact and does not show obvious signs of distress.

SUBSURFACE SOIL CONDITIONS

Subsurface conditions along the proposed replacement bulkhead alignment were explored by advancing and sampling three exploratory borings (identified as borings B-1-12, B-2-12, and B-3-12)

with a truck-mounted drill rig on January 5, 2012. The exploratory borings were advanced to depths ranging from about 16¹/₂ to 46¹/₂ ft below the existing ground surface (BGS). The approximate locations of our exploratory borings are shown on Figure 2. A discussion of our field exploration and laboratory testing program, along with edited logs of the exploratory borings and laboratory test results are provided in Appendix A.

Additional information regarding subsurface conditions near the project site was obtained from a review of summary logs of borings that were previously advanced near the project area. These borings, advanced in 1998, indicate that glaciomarine drift is present to a considerable depth beneath the project site (Otten 1998).

Based on the subsurface conditions observed in our exploratory borings, the alignment of the proposed replacement bulkhead appears to be underlain by about 12 to 15 ft of fill that generally consists of soft to loose, sandy, silty clay and lenses of silty sand. These materials are consistent with dredge fill, which was placed in the project area during marina dredging operations that took place in the late 1950s. While not observed in our borings, fill could also include coarser material, such as construction debris, gravel, or boulders, and the top of the native mudline could include logs or other debris not observed during our subsurface exploration program. Below the fill, loose silty fine sand and soft sandy silt (interpreted to be marine deposits) were present in each of our three borings; these soils were observed to a depth of about 25 ft BGS in B-2-12 (our other two borings were terminated in this soil unit). Below a depth of about 25 ft BGS, very soft to medium stiff silty clay and pockets of sandy clay (interpreted to be glaciomarine drift) were present to the maximum depth explored at the location of boring B-2-12 (about 46½ ft BGS). Dropstones consisting of coarse sand and gravel, and occasionally boulders, are often present in glaciomarine drift, although we did not observe dropstones in our subsurface explorations.

ENVIRONMENTAL CONDITIONS

Blaine Marina, Inc. has operated a small fuel tank farm at the project site since 1955. At least two releases of petroleum hydrocarbons have occurred at the site during that time. Several environmental investigations have been conducted at the site since 1990 to assess soil and groundwater quality for evidence of petroleum hydrocarbon releases from facility operations. These investigations discovered petroleum hydrocarbon contamination in soil and groundwater at the site, generally decreasing in concentration with increasing distance from the ASTs. Sheen has been observed in soil and groundwater over a large area in the vicinity of the ASTs. However, the extent of contamination is not well bounded by investigations conducted to date, and most of the data are 15 to 20 years old and may not be representative of current conditions. Additional investigations will be conducted as part of the Remedial

Investigation/Feasibility Study (RI/FS) process to better understand the nature and extent of contamination at the site.

During advancement of the three borings for our geotechnical investigation, soil samples were collected and field-screened for indications of obvious contamination. Field screening included visual inspection for evidence of staining or sheen on the surface of the soil, photoionization detector (PID) screening for the presence of volatile organic compounds (VOCs), and observations of unusual odors. The observed soil conditions and field-screening results are summarized on our summary boring logs, which are provided in Appendix A.

Landau Associates personnel detected petroleum hydrocarbon odors at each of the three boring locations, beginning at a depth of approximately 7½ ft BGS and persisting to depths ranging from about 14 to 17 ft BGS. Other observations, including the presence of an oil sheen and PID screening results, are presented on the boring logs in Appendix A. PID screening results greater than 400 parts per million (ppm) were observed at each boring location. Soil samples were collected for discretionary chemical analysis from the depths with the greatest indication of contamination based on the results of the field screening. Samples were collected from the sampler and placed directly into 4-oz glass, non-preserved sampling jars supplied by the analytical laboratory. Samples were labeled, placed on ice, and delivered directly to ALS Laboratories in Everett, Washington following standard chain-of-custody procedures. Because this was a geotechnical investigation and significant volatile contamination was not anticipated, sample collection procedures did not conform to U.S. Environmental Protection Agency (EPA) Method 5035 standards.

ALS Laboratories analyzed the discrete soil samples for gasoline-range total petroleum hydrocarbons (TPH-G) by Method NWTPH-Gx, for diesel- and oil-range total petroleum hydrocarbons (TPH-D and TPH-O, respectively) by Method NWTPH-Dx, and for the VOCs most commonly associated with petroleum hydrocarbon contamination—benzene, toluene, ethylbenzene, and xylenes (BTEX)—by EPA Method 8021. Investigation-derived waste (IDW) included soil cuttings from each of the borings and washwater used to decontaminate drilling equipment. IDW was stored at the project site in labeled 55-gallon drums pending disposal. Soil samples were collected from the drums containing soil, and a water sample was collected from a drum containing decontamination fluids for waste characterization to support disposal. A copy of the analytical laboratory report prepared by ALS Laboratories is provided in Appendix B. The report presents the analytical results for discrete soil samples B-1 S-3 7.5', B-2 S-3 7.5', and B-3 S-3, 7.5', and waste characterization samples Drum #2-a and Drill Wash Water.

The field-screening and analytical results for the discrete soil samples indicate that TPH-G is present in the soil adjacent to the bulkhead at concentrations significantly above the Model Toxics Control Act (MTCA) Method A cleanup levels, which are the preliminary screening levels for the site. The preliminary screening levels for TPH-G are 100 milligrams per kilogram (mg/kg) if benzene is not present or 30 mg/kg if benzene is present. The contamination encountered in our subsurface explorations appeared to be confined to a zone between approximately 7½ ft BGS and 14 to 17 ft BGS. TPH-G was detected in soil samples from borings B-1-12, B-2-12, and B-3-12 at concentrations of 680 mg/kg, 6,100 mg/kg, and 1,800 mg/kg, respectively. Concentrations of TPH-D, TPH-O, and BTEX were below the preliminary screening levels. Benzene was not detected at concentrations above the laboratory reporting limits, although these limits were somewhat elevated and slightly above the preliminary screening levels. The results are considered adequate to suggest that TPH-G contamination is present near the bulkhead. BTEX constituents that are typically associated with TPH-G are present only at very low concentrations, supporting the conclusion that the contamination observed is not in the immediate vicinity of the source.

GROUNDWATER

At the time of our subsurface investigation in early January 2012, groundwater was observed in our borings beginning at depths of about 7 to 9½ ft BGS. These depths correspond to the sandier material observed near the bottom of the fill unit. Due to the low permeability of the clayey upper fill, the piezometric groundwater surface may be somewhat higher, although this could not be confirmed due to the relatively short duration between boring completion and decommissioning. The groundwater conditions reported on the exploratory boring logs are for the specific locations and dates indicated, and therefore may not necessarily be indicative of other locations and/or times. Furthermore, it is expected that groundwater conditions vary depending on local subsurface conditions, tidal fluctuations, the weather, and other factors.

CONCLUSIONS AND RECOMMENDATIONS

Based on the results of our field exploration, laboratory testing, and engineering analyses conducted for this project, it is our opinion that construction of the proposed cantilevered sheetpile replacement bulkhead is feasible from a geotechnical perspective, provided the recommendations contained herein are incorporated into project design and construction. Additional conclusions and specific recommendations regarding environmental considerations, seismic design considerations, bulkhead design, sheetpile installation, pile driving considerations, and wall backfill placement and compaction are presented in the following sections.

ENVIRONMENTAL CONSIDERATIONS

Based on the environmental conditions for the site as discussed above, construction activities are likely to be conducted above the zone of petroleum hydrocarbon contamination. Because installation of

the sheetpile wall is generally conducted from above the ground surface, and includes only limited excavation activities, construction activities will not likely encounter significant contamination. Planned excavation for the sheetpile bulkhead repair will likely be limited to about the upper 2 to 3 ft of soil, and the contamination in the vicinity of the planned bulkhead repair appears limited to below approximately $7\frac{1}{2}$ ft BGS.

Based on the proximity to contamination, excavated material should be screened for contamination by typical field-screening techniques including visual, olfactory, and PID observation. Soil exhibiting indications of potential contamination should be segregated from soil that appears to be clean. Potentially contaminated soil should be sampled and analyzed as described in the draft Interim Action Plan (Landau Associates 2012). Excavated soil should remain on site pending the results of chemical analyses and waste profiling. Soil management procedures, including handling, storage, and best management practices to prevent migration of the soil away from the managed area, should be addressed in the design documents and implemented by the contractor during construction activities. All soil that exceeds MTCA cleanup levels should be disposed of off site at an appropriate disposal facility based on the disposal profile, and in accordance with Washington State regulations. Soil that does not exhibit any visual, olfactory, or field-screening indications of potential contamination, or does not exceed MTCA cleanup levels, may be reused on site as either backfill for the interim action or as general fill.

Anticipated potential chemical hazards include exposure to site contaminants through various exposure pathways (i.e., direct contact, inhalation, and ingestion). Because the interim action includes only limited excavation to depths not anticipated to contain hazardous substances at concentrations of concern, chemical exposure is unlikely to be an issue. Therefore, screening of work zone vapor conditions and soil quality should initially be conducted using visual and olfactory screening by an environmental professional. If indications of TPH contamination are observed, workspace air and excavated soil should be screened using a PID to determine if VOC concentrations are high enough to warrant the preparation and implementation of a contractor health and safety plan (HASP). If so determined, intrusive activities should be halted until the HASP is implemented.

SEISMIC DESIGN CONSIDERATIONS

The Pacific Northwest is seismically active and the project site could be subject to ground shaking from a moderate to major earthquake. Consequently, moderate levels of earthquake shaking should be anticipated during the design life of the project, and the proposed replacement bulkhead should be designed to resist earthquake loading using an appropriate design methodology. The recommended lateral earth pressures for design of the sheetpile wall that are presented in the next section of this report include an increment due to seismic earth pressures.

Liquefaction is a phenomenon where soil below the groundwater table temporarily experiences a reduction in strength during and following an earthquake. Soils most susceptible to liquefaction include primarily loose sands with low fines content. Although loose sand was encountered in the lower portion of the fill and in the uppermost native soils, it typically contains considerable silt. Due to the silt content, we expect that liquefaction behind the replacement bulkhead would be relatively moderate. Based upon the site history of the Blaine Marina, we expect that similar liquefiable soils are present wherever hydraulic fill has been placed and that widespread liquefaction would occur following a major earthquake. Following liquefaction, additional post-earthquake settlement would occur. Our scope of services did not include a quantitative analysis of the factor-of-safety for liquefaction or the magnitude of post-liquefaction settlement. Differential settlement caused by liquefaction could adversely impact underground utilities. Accordingly, we recommend that underground utilities that will penetrate the bulkhead be designed and constructed with an appropriate degree of flexibility to limit the potential for joint dislocation or failure.

BULKHEAD DESIGN

The replacement sheetpile bulkhead should be designed and constructed to resist active lateral earth pressures. The use of active lateral earth pressures assumes that sufficient deformation of the soil behind the wall could occur to develop an active condition. Theoretical and observed lateral deflections at the top of bulkheads designed for active pressures are typically on the order of 0.001 to 0.002 times the height of the wall. This lateral deformation is likely to be accompanied by minor vertical settlement.

In the case of a bulkhead acting as a cantilevered wall, the applied active lateral earth pressure can be represented by a triangular pressure distribution. Figure 3 presents design parameters for active lateral earth pressures for the proposed replacement bulkhead. The active lateral pressures would act over the full height of the wall. The assumed mudline elevation in front of the bulkhead [Elevation +6 ft mean lower low water (MLLW), as shown on Figure 3] assumes that the existing timber bulkhead completely deteriorates over time and the backfill between the existing and replacement bulkheads erodes over time so as to provide no soil support in front of the replacement bulkhead.

Our recommended design lateral earth pressures assume a groundwater level at Elevation +8 ft MLLW on the upland side of the replacement bulkhead and a level consistent with the assumed mudline on the water side of the bulkhead, or Elevation +6 ft MLLW. The design lateral pressures presented on Figure 3 include this unbalanced hydrostatic force on the proposed sheetpile wall.

Design earthquake loads on the bulkhead were based on an interpretation of the Mononobe-Okabe pseudo-static method of analysis, as summarized in the Washington State Department of Transportation (WSDOT) *Bridge Design Manual* (WSDOT 1998). The seismic coefficient used in the analysis was 0.15, which is about one-half of the peak ground acceleration associated with an earthquake with a probability of exceedance of 7 percent in 75 years (1-in-975-year event) (USGS website 2012). It is assumed that the new sheetpile bulkhead will be able to yield sufficiently to approximate an active condition. The resulting seismic lateral pressure was approximated by an inverse trapezoidal pressure distribution acting over the wall, as shown on Figure 3.

It is common practice to accommodate traffic and typical construction equipment loading with a vertical surcharge pressure of 200 to 300 pounds per square foot. Larger surcharge loads, such as from heavy cranes or other concentrated loading, should be addressed by use of a higher surcharge pressure. For walls free to rotate during loading, a uniformly distributed lateral pressure of 0.36 times the surcharge pressure should be included as shown on Figure 3.

Passive earth pressure criteria for resistance of lateral loads are also presented on Figure 3. The passive pressures were reduced due to the presence of a downward-sloping mudline in front of the sheetpile wall. The passive earth pressures shown on Figure 3 are ultimate values and do not include a factor of safety; therefore, the calculated wall embedment depth should be multiplied by 1.4.

To maintain global stability of the sheetpile bulkhead (stability along a critical surface that extends through the soil below the tip of the sheetpile wall), we recommend a minimum sheetpile embedment depth of 10 ft below the assumed mudline at Elevation +6 ft MLLW, which corresponds to a minimum pile embedment at Elevation –4 ft MLLW. It is expected that internal stability to resist design lateral loads would control the required minimum embedment depth.

SHEETPILE INSTALLATION

We understand that the existing fuel office building will be removed prior to construction of the replacement bulkhead. Sheetpile bulkhead installation is planned within a few feet behind the existing timber bulkhead, which is supported by timber piles that are embedded an unknown depth. Because of the presence of generally soft and loose soils at the project site, it is expected that a vibratory hammer could be used to install the sheetpiles. This expectation is based upon the reported successful installation of 16-inch-diameter steel pipe piles using a vibratory hammer in similar soils around the wave barrier at the harbor entrance (PN&D 1999). However, it should be noted that some obstructions may exist at the project site that could complicate or prevent sheetpile installation, as discussed in the General Geologic Conditions section. It is also possible that some of the existing timber bulkhead piles were not installed plumb or have rotated following construction of the existing bulkhead. Where this has occurred, these piles could be encountered at depth during sheetpile installation.

In addition to utilities that cross the bulkhead, we observed what appear to be bearing plates on the outside face of some of the timber piles that support the timber bulkhead lagging. These plates may be the

termini of bulkhead anchor ties. We were not able to conclusively determine whether deadman or other anchors were used for bulkhead support; however, if present, they would conflict with sheetpile installation. If present, we expect that the anchor ties could be removed as sheetpile installation progresses. Only the tie closest to the active sheetpile installation area should be cut, and the ties should be left in place for as long as available space permits.

PILE DRIVING VIBRATION AND SETTLEMENT CONSIDERATIONS

Installation of sheetpiles using a vibratory hammer will produce ground vibration in the vicinity of the sheetpile installation. While unlikely, ground vibrations associated with installation of the sheetpiles could potentially cause some damage to nearby structures. Ground vibrations occurring in loose sand, such as is present in the lower fill and upper native soil at the project site, could also result in the densification of the loose soil and some settlement of the ground surface. Ground vibrations producing densification and settlement are dependent on a complex combination of factors, including energy and amplitude of the vibratory hammer, number of repetitions, soil properties, pile length, location of the water table, type of pile installation, and distance from the pile.

Settlement of the ground surface resulting from vibrations densifying loose sand has been documented in previous published (Dowding 1995) and unpublished case histories. The magnitude of settlement is typically greatest in the immediate vicinity of the pile and decreases with increasing distance from the pile.

Vibration resulting from pile installation has been found to be perceptible to occupants of nearby structures at levels much lower than those that result in building damage. Claims of damage due to vibration often arise when the vibration is quite noticeable, even if it is at levels that are unlikely to produce damage. For that reason, we recommend that a detailed visual reconnaissance of the existing structures and photographic documentation of any existing cracks or building distress be accomplished prior to installation of the replacement bulkhead. We also recommend that the condition of existing buried utilities, especially storm and sanitary sewers, be documented before and during construction. This can be accomplished with conventional vertical and horizontal surveying, television surveys, and other methods.

GEOTECHNICAL CONSULTATION AND CONSTRUCTION MONITORING

We recommend that Landau Associates review the earthwork and bulkhead design portions of the project drawings and specifications. The purpose of this review would be to verify that the recommendations presented in this report have been properly interpreted and incorporated.

The integrity of the replacement bulkhead can be dependent on confirmation of site and subsurface conditions at the time of construction and the use of appropriate installation procedures. Accordingly, we recommend construction monitoring services be provided during demolition, sheetpile installation, and site restoration activities. Landau Associates would be pleased to provide these services.

USE OF THIS REPORT

Landau Associates prepared this report for the exclusive use of the Port of Bellingham and Reid Middleton for specific application to the design of the proposed Blaine Marina Fuel Pier Bulkhead Replacement project. Use of this report by others or for another project is at the user's sole risk. Within the limitations of scope, schedule, and budget, Landau Associates' services have been conducted in accordance with generally accepted practices of the geotechnical engineering profession; no other warranty, express or implied, is made as to the professional advice included in this report.

The conclusions and recommendations contained in this report are based in part upon the subsurface data obtained from the explorations completed for this study. There may be some variation in subsurface soil and groundwater conditions at the site, and the nature and extent of the variations may not become evident until construction. Accordingly, a contingency for unanticipated conditions should be included in the construction budget and schedule.

If variations in subsurface conditions are encountered during construction, Landau Associates should be notified for review of the recommendations of this report, and revision of such if necessary. If there is a substantial lapse of time between submission of this report and the start of construction, or if conditions change due to construction operations at or adjacent to the project site, we recommend that we review this report to determine the applicability of the conclusions and recommendations contained herein.

We appreciate the opportunity to provide geotechnical services on this project and look forward to assisting you as needed during the construction phases of the project. If you have any questions or comments regarding the information contained in this report, or if we may be of further service, please contact us.

LANDAU ASSOCIATES, INC.

Chad T. McMullen, P.E. Senior Project Geotechnical Engineer

War

Steven R. Wright, P.E. Senior Associate

CTM/SZW/DAP/ccy

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APPENDIX A

Field Exploration and Laboratory Testing

APPENDIX A FIELD EXPLORATIONS AND LABORATORY TESTING

Subsurface conditions at the project site were explored on January 5, 2012. The exploration program consisted of advancing and sampling three soil borings (B-1-12 through B-3-12) at the approximate locations shown on the Site and Exploration Plan (Figure 2 of this report). The exploratory borings were advanced to depths ranging from about 16¹/₂ to 46¹/₂ ft below the ground surface (BGS) using a truck-mounted drill rig and the hollow-stem auger drilling technique. Holocene Drilling, Inc. of Puyallup, Washington advanced the borings under subcontract to Landau Associates. The explorations were located approximately in the field by hand-taping distances from existing physical features and referenced to a site map prepared by Wilson Engineering, Inc. The ground surface elevations at the exploratory boring locations were interpreted from topographic information indicated on the above referenced site map.

The field exploration program was coordinated and monitored by a Landau Associates geotechnical engineer, who also obtained representative soil samples, maintained a detailed record of observed subsurface soil and groundwater conditions, and described the soil encountered by visual and textural examination. Each representative soil type observed in our exploratory borings was described using the soil classification system shown on Figure A-1, in general accordance with ASTM International (ASTM) standard D 2488, *Standard Recommended Practice for Description of Soils (Visual-Manual Procedure)*. Summary logs of the exploratory borings are presented on Figures A-2 through A-4. These logs represent Landau Associates' interpretation of subsurface conditions identified during the field exploration program. The stratigraphic contacts shown on the summary logs represent the approximate boundaries between soil types; actual transitions may be more gradual. The soil and groundwater conditions depicted on the summary logs are only for the specific date and locations reported, and therefore are not necessarily representative of other locations and times. A further discussion of the soil and groundwater conditions observed is in the text portion of this report.

Representative disturbed samples of the soils encountered in the exploratory borings were obtained at selected intervals using either a 1.5-inch inside-diameter (ID) Standard Penetration Test split-spoon sampler or a 2.42-inch ID split-barrel sampler. The sampler was driven up to 18 inches into the undisturbed soil ahead of the drill bit with a 140-lb automatic hammer falling a distance of approximately 30 inches. The number of blows required to drive the sampler for the final 12 inches of soil penetration, or part thereof, is noted on the boring logs, adjacent to the appropriate sample notation. Upon completion of drilling and sampling, the boreholes were decommissioned in general accordance with the requirements of Washington Administrative Code (WAC) 173-160.

Samples obtained from the exploratory borings were taken to our laboratory for further examination and testing. The laboratory testing program, which was performed in general accordance with the ASTM standard test procedures described below, was limited to visual inspection to confirm our field soil descriptions and determination of natural moisture content and grain size distribution. The natural moisture contents of selected soil samples obtained from our exploratory borings were determined in general accordance with ASTM D 2216 test procedures. The results from the moisture content determinations are indicated adjacent to the corresponding samples on the summary logs. The grain size distribution of selected soil samples obtained from our exploratory borings was determined in general accordance with ASTM D 422 test procedures. The test results are presented in the form of a grain size distribution curve on Figure A-5.

				Classific	USCS			
	MAJOR DIVISIONS			GRAPHIC SYMBOL	LETTER SYMBOL ⁽¹⁾	DI	TYPICAL ESCRIPTIONS ⁽²⁾⁽³⁾	
	GRAVEL AND	CLEAN GF	RAVEL	$\begin{array}{cccccccccccccccccccccccccccccccccccc$		Well-graded gra	avel; gravel/sand mixture(s); little or no fin	es
COARSE-GRAINED SOIL (More than 50% of material is larger than No. 200 sieve size)	GRAVELLY SOIL	(Little or no	o fines)	$ \begin{array}{c} 0 \\ 0 \\ 0 \\ 0 \\ 0 \\ 0 \\ 0 \\ 0 \\ 0 \\ 0 \\$	GP	Poorly graded g	ravel; gravel/sand mixture(s); little or no fi	ines
	(More than 50% of coarse fraction retained	GRAVEL WIT			GM	Silty gravel; grav	el/sand/silt mixture(s)	
	on No. 4 sieve)	d (Appreciable a fines)		[]]]]	GC	Clayey gravel; g	ravel/sand/clay mixture(s)	
	SAND AND	CLEAN S			SW	Well-graded sar	nd; gravelly sand; little or no fines	
	SANDY SOIL	(Little or no	o fines)		SP	Poorly graded s	and; gravelly sand; little or no fines	
	(More than 50% of coarse fraction passed			SM		Silty sand; sand	/silt mixture(s)	
	through No. 4 sieve)	fines		////	SC		nd/clay mixture(s)	
INE-GRAINED SOIL (More than 50% of material is smaller than No. 200 sieve size)	SILT AND CLAY				ML	Inorganic silt and very fine sand; rock flour; silty or clayey fi sand or clayey silt with slight plasticity		
					CL	Inorganic clay of low to medium plasticity; gravelly clay; sand clay; silty clay; lean clay		andy
More than 50% terial is smalle	(Liquid limit less than 50)		<		OL	Organic silt; organic, silty clay of low plasticity		
e tha al is 200 s	SILT AND CLAY				MH	Inorganic silt; micaceous or diatomaceous fine sand		
No.	(Liquid limit greater than 50)				СН	Inorganic clay of high plasticity; fat clay		
					ОН	Organic clay of	c clay of medium to high plasticity; organic silt	
	HIGHLY	ORGANIC SOIL			PT	Peat; humus; sv	wamp soil with high organic content	
				GRAPHIC	LETTER			
OTHER MATERIALS				SYMBOL	SYMBOL	TYPI	CAL DESCRIPTIONS	
	PAVEN	/IENT			AC or PC	Asphalt concrete	e pavement or Portland cement pavemen	t
ROCK					RK	Rock (See Rock	Classification)	
	WO	DD			WD	Wood, lumber,	vood chips	
	DEB	RIS			DB	Construction de	bris, garbage	
(Vis the 3. Soil	sual-Manual Procedure) Standard Test Method I description terminolog fined as follows: Priman Secondary), outlined in ASTM for Classification of y is based on visua y Constituent: Constituents: > 30 > 15	D 2488. Wh f Soils for En l estimates (> 50% % and <u><</u> 50%	nere laboraton ngineering Pu in the absend % - "GRAVEL	ry index testing h irposes, as outli ce of laboratory _," "SAND," "SIL	has been conducte ned in ASTM D 24 test data) of the pe Γ," "CLAY," etc.	ercentages of each soil type and is	
4 Soil			5% and ≤ 15% ≤ 5%	% - "gravelly,' % - "with grav % - "with trac	" "sandy," "silty," vel," "with sand," e gravel," "with t	etc. "with silt," etc. race sand," "with t	race silt," etc., or not noted.	
		descriptions are ba	5% and $\leq 15\%$ $\leq 5\%$ ased on judge	% - "gravelly,' % - "with grav % - "with trac ement using	" "sandy," "silty," vel," "with sand," e gravel," "with t	etc. "with silt," etc. race sand," "with t	race silt," etc., or not noted. tion blow counts, drilling or	
	l density or consistency cavating conditions, field Drilling	descriptions are ba	$\frac{15\%}{5}$ and $\frac{15\%}{5}$ ased on judg ory tests, as a ing Key	% - "gravelly," % - "with grav % - "with trac ement using appropriate.	" "sandy," "silty," <i>v</i> el," "with sand," e gravel," "with t a combination c	etc. "with silt," etc. race sand," "with t f sampler penetra	, ,	
Exact Code a 3.25 b 2.00 c She d Gra e Sing f Dou g 2.50 h 3.00 i Oth 1 300 2 140	I density or consistency cavating conditions, field Drilling SAMPLER TYPE Description 5-inch O.D., 2.42-inch I.I 0-inch O.D., 1.50-inch I.I Jeby Tube ab Sample gle-Tube Core Barrel Jble-Tube Core Barrel Jble-Tube Core Barrel Jole-Tube Core Ba	descriptions are ba tests, and laborato and Sampl D. Split Spoon D. Split Spoon D. WSDOT I.D. WSDOT I.D. Mod. California e	3% and $\frac{1}{\leq} 15\%$ ased on judg ory tests, as a ing Key SAMPLE I	% - "gravelly; % - "with grav % - "with trac ement using appropriate. NUMBER & NUMBER & Recovery ← Sample Portion of Sa for Arch	" "sandy," ^f isilty," rel," "with sand," e gravel," "with s a combination o INTERVAL ication Number y Depth Interval e Depth Interval ample Retained nive or Analysis	etc. "with silt," etc. race sand," "with t f sampler penetra	tion blow counts, drilling or	ita
Example 2.00 c Shee d Gra e Sing f Dou g 2.55 h 3.00 i Oth 1 300 2 140 3 Pus	I density or consistency cavating conditions, field Drilling SAMPLER TYPE Description 5-inch O.D., 2.42-inch I.I 0-inch O.D., 1.50-inch I.I ab Sample gle-Tube Core Barrel Jole-Tube Core Barrel Jole-Tube Core Barrel Jolich O.D., 2.00-inch I.I 0-inch O.D., 2.375-inch I ner - See text if applicabl 0-lb Hammer, 30-inch Dr	descriptions are ba I tests, and laborato and Sampl D. Split Spoon D. Split Spoon D. WSDOT I.D. WSDOT I.D. Mod. California e op op	i% and ≤ 15% ≤ 5% assed on judg ory tests, as a ing Key SAMPLE I SAMPLE I	 "gravelly," "with gravelly," "with gravely," "with gravely," ement using appropriate. NUMBER & Ample Identified Recovery Sample Portion of Safor Arch 	" "sandy," ^f isilty," rel," "with sand," e gravel," "with s a combination o INTERVAL ication Number y Depth Interval e Depth Interval ample Retained nive or Analysis	etc. "with silt," etc. race sand," "with t f sampler penetra Fie PP = 1.0 TV = 0.5 PID = 100 W = 10 D = 120 -200 = 60 GS AL GT CA	tion blow counts, drilling or Id and Lab Test Data Description Pocket Penetrometer, tsf Torvane, tsf Photoionization Detector VOC screenin Moisture Content, % Dry Density, pcf Material smaller than No. 200 sieve, % Grain Size - See separate figure for da Atterberg Limits - See separate figure Other Geotechnical Testing	ita
Exact Code a 3.25 b 2.00 c She d Gra e Sing f Dou g 2.50 h 3.00 i Oth 1 300 2 140 3 Pus 4 Vibr	I density or consistency cavating conditions, field Drilling SAMPLER TYPE Description 5-inch O.D., 2.42-inch I.I 0-inch O.D., 1.50-inch I.I elby Tube ab Sample gle-Tube Core Barrel uble-Tube Core Barrel uble-Tube Core Barrel 0-inch O.D., 2.00-inch I.I 0-inch O.D., 2.375-inch I her - See text if applicabl hb Hammer, 30-inch Dr shed	descriptions are ba I tests, and laborato and Sampl D. Split Spoon D. Split Spoon D. WSDOT I.D. Mod. California e op op op	i% and ≤ 15% ≤ 5% ased on judg ory tests, as a ing Key SAMPLE I SAMPLE I	 gravelly, "with grav "with grav "with grav "with trace ement using appropriate. NUMBER & ample Identifitient Recovery ← Sample Portion of Safor Arch "OUNDWE "OUNDWE 	" "sandy," ^f isilty," e gravel," "with sand," e gravel," "with sand," a combination of INTERVAL ication Number y Depth Interval e Depth Interval ample Retained nive or Analysis	etc. "with silt," etc. race sand," "with t f sampler penetra Fie Code PP = 1.0 TV = 0.5 PID = 100 W = 10 D = 120 -200 = 60 GS AL GT CA	tion blow counts, drilling or Id and Lab Test Data Description Pocket Penetrometer, tsf Torvane, tsf Photoionization Detector VOC screenin Moisture Content, % Dry Density, pcf Material smaller than No. 200 sieve, % Grain Size - See separate figure for da Atterberg Limits - See separate figure Other Geotechnical Testing	ita








1034.01 4/5/12 N:\PROJECTS\001034.010.015.GPJ GRAIN SIZE FIGURE





APPENDIX B

Environmental Laboratory Analytical Report



January 23, 2012

Mr. Jeremy Davis Landau Associates, Inc. 130 - 2nd Ave. S. Edmonds, WA 98020

Dear Mr. Davis,

On January 6th, 10 samples were received by our laboratory and assigned our laboratory project number 1201032. The project was identified as your Blaine Marina Bulkhead. The sample identification and requested analyses are outlined on the attached chain of custody record.

No abnormalities or nonconformances were observed during the analyses of the project samples.

Please do not hesitate to call me if you have any questions or if I can be of further assistance.

Sincerely,

ALS Laboratory Group

X Bagon

Rick Bagan Laboratory Director

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CLIENT: CLIENT CONTACT: CLIENT PROJECT: CLIENT SAMPLE ID	Jeremy Davis DA Blaine Marina Bulkhead COLLE			DA ALS JC ALS SAMPL DATE RECEIV DLLECTION DA ACCREDITATION	0B#: 120 .E#: -01 ED: 1/6/ .TE: 1/5/	3/2012 1032 2012 2012 12:27)1	
		DA	TA RESULTS				
ANALYTE	METHOD	RESULTS	REPORTING LIMITS	DILUTION FACTOR	UNITS	ANALYSIS A DATE	NALYSIS BY
TPH-Volatile Range	NWTPH-GX	680	30	10	MG/KG	01/09/2012	DLC
Benzene	EPA-8021	U	0.30	10	MG/KG	01/09/2012	DLC
Toluene	EPA-8021	0.89	0.50	10	MG/KG	01/09/2012	DLC
Ethylbenzene	EPA-8021	1.6	0.50	10	MG/KG	01/09/2012	DLC
Xylenes	EPA-8021	U	2.0	10	MG/KG	01/09/2012	DLC
TPH-Diesel Range	NWTPH-DX w/ SGA	140	25	1	MG/KG	01/06/2012	DLC
TPH-Oil Range	NWTPH-DX w/ SGA	U	50	1	MG/KG	01/06/2012	DLC
SURROGATE	METHOD	%REC				ANALYSIS ANALYSIS DATE BY	
TFT 10X Dilution	NWTPH-GX	33.6 DS2				01/09/2012	DLC
TFT 10X Dilution	EPA-8021	26.1 DS2				01/09/2012	DLC
C25	NWTPH-DX w/ SGA	118				01/06/2012	DLC

U - Analyte analyzed for but not detected at level above reporting limit. DS2 - Due to high dilution factor surrogate results should be considered uncontrolled. Chromatogram indicates that it is likely that sample contains weathered gasoline and weathered diesel.

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		CERTIFIC	ATE OF ANALYSI	S							
CLIENT:	Landau Associates, 130 - 2nd Ave. S.	Inc.		DATE: 1/23/2012 ALS JOB#: 1201032							
	Edmonds, WA 9802	0		ALS SAMPL	E#: -02						
CLIENT CONTACT:	Jeremy Davis			DATE RECEIVI	ED: 1/6/	2012					
CLIENT PROJECT:	Blaine Marina Bulkh	-									
CLIENT SAMPLE ID	B-2 S-3 7.5'		WDOE ACCREDITATION: C601								
DATA RESULTS											
ANALYTE	METHOD	RESULTS	REPORTING LIMITS	DILUTION FACTOR	UNITS	ANALYSIS / DATE	ANALYSIS BY				
TPH-Volatile Range	NWTPH-GX	6100	300	100	MG/KG	01/06/2012	DLC				
Benzene	EPA-8021	U	3.4	100	MG/KG	01/06/2012	DLC				
Toluene	EPA-8021	U	5.7	100	MG/KG	01/06/2012	DLC				
Ethylbenzene	EPA-8021	120	5.0	100	MG/KG	01/06/2012	DLC				
Xylenes	EPA-8021	120	20	100	MG/KG	01/06/2012	DLC				
TPH-Diesel Range	NWTPH-DX w/ SGA	510	25	1	MG/KG	01/06/2012	DLC				
TPH-Oil Range	NWTPH-DX w/ SGA	U	50	1	MG/KG	01/06/2012	DLC				
						ANALYSIS / DATE	ANALYSIS BY				
SURROGATE	METHOD	%REC									
TFT 100X Dilution	NWTPH-GX	35.5 DS2				01/06/2012	DLC				
TFT 100X Dilution	EPA-8021	33.5 DS2				01/06/2012	DLC				
C25	NWTPH-DX w/ SGA	103				01/06/2012	DLC				

U - Analyte analyzed for but not detected at level above reporting limit. DS2 - Due to high dilution factor surrogate results should be considered uncontrolled. Chromatogram indicates that it is likely that sample contains weathered gasoline and weathered diesel.

Diesel range product reporting limits raised due to volatile range product overlap.

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		CERTIFIC	ATE OF ANALYSI	S						
CLIENT:	Landau Associates,	Inc.		DATE: 1/23/2012						
	130 - 2nd Ave. S.	^		ALS JOB#: 1201032						
	Edmonds, WA 9802	0		ALS SAMPL						
CLIENT CONTACT:	Jeremy Davis			DATE RECEIV		2012				
CLIENT PROJECT:	Blaine Marina Bulkh	ead		DLLECTION DA		2012 16:45				
CLIENT SAMPLE ID	B-3 S-3 7.5'		WDOE ACCREDITATION: C601							
		DA	TA RESULTS							
ANALYTE	METHOD	RESULTS	REPORTING LIMITS	DILUTION FACTOR	UNITS	ANALYSIS /	ANALYSIS BY			
TPH-Volatile Range	NWTPH-GX	1800	300	100	MG/KG	01/06/2012	DLC			
Benzene	EPA-8021	U	3.0	100	MG/KG	01/06/2012	DLC			
Toluene	EPA-8021	U	5.0	100	MG/KG	01/06/2012	DLC			
Ethylbenzene	EPA-8021	31	5.0	100	MG/KG	01/06/2012	DLC			
Xylenes	EPA-8021	42	20	100	MG/KG	01/06/2012	DLC			
TPH-Diesel Range	NWTPH-DX w/ SGA	330	25	1	MG/KG	01/06/2012	DLC			
TPH-Oil Range	NWTPH-DX w/ SGA	150	50	1	MG/KG	01/06/2012	DLC			
						ANALYSIS				
SURROGATE	METHOD	%REC				DATE	BY			
TFT 100X Dilution	NWTPH-GX	6.55 DS2				01/06/2012	DLC			
TFT 100X Dilution	EPA-8021	19.4 DS2				01/06/2012	DLC			
C25	NWTPH-DX w/ SGA	125				01/06/2012	DLC			

U - Analyte analyzed for but not detected at level above reporting limit. DS2 - Due to high dilution factor surrogate results should be considered uncontrolled. Chromatogram indicates that it is likely that sample contains highly weathered gasoline and weathered diesel.

Diesel range product reporting limits raised due to volatile range product overlap.

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CERTIFICATE OF ANALYSIS												
CLIENT:	Landau Associates	s, Inc.	DATE: 1/23/2012									
	130 - 2nd Ave. S.			ALS JO	B#: 120	1032						
	Edmonds, WA 980	20		ALS SAMPL	.E#: -05							
CLIENT CONTACT:	Jeremy Davis			DATE RECEIV	ED: 1/6/	2012						
CLIENT PROJECT:	Blaine Marina Bulk	head	CC	DLLECTION DA	TE: 1/5/	2012 12:20						
CLIENT SAMPLE ID	Drum #2-A	Drum #2-A WDOE ACCREDITATION: C601										
DATA RESULTS												
ANALYTE	METHOD	RESULTS	REPORTING LIMITS	DILUTION FACTOR	UNITS	ANALYSIS A DATE	ANALYSIS BY					
Mercury	EPA-7471	U	0.020	1	MG/KG	01/11/2012	RAL					
Arsenic	EPA-6020	3.5	0.82	5	MG/KG	01/10/2012	RAL					
Barium	EPA-6020	38	0.70	5	MG/KG	01/10/2012	RAL					
Cadmium	EPA-6020	U	1.4	5	MG/KG	01/10/2012	RAL					
Chromium	EPA-6020	18	0.81	5	MG/KG	01/10/2012	RAL					
Lead	EPA-6020	3.6	0.79	5	MG/KG	01/10/2012	RAL					
Selenium	EPA-6020	U	1.2	5	MG/KG	01/10/2012	RAL					
Silver	EPA-6020	U	0.26	5	MG/KG	01/10/2012	RAL					

U - Analyte analyzed for but not detected at level above reporting limit.

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		CERTIFIC	ATE OF ANALYSI	S							
CLIENT:	Landau Associates, 130 - 2nd Ave. S.			DAT ALS JOE		/23/2012 201032					
	Edmonds, WA 9802	0		ALS SAMPLE	E#: -10						
CLIENT CONTACT:	Jeremy Davis			DATE RECEIVE	D: 1/6/	2012					
CLIENT PROJECT:	Blaine Marina Bulkhe	ead	CC	LLECTION DAT	E: 1/5/	2012 17:05					
CLIENT SAMPLE ID	Drill Wash Water		WDOE	ACCREDITATIC	N: C60)1					
DATA RESULTS											
ANALYTE	METHOD	RESULTS	REPORTING LIMITS	DILUTION FACTOR	UNITS	ANALYSIS A DATE	ANALYSIS BY				
TPH-Volatile Range	NWTPH-GX	830	50	1	UG/L	01/06/2012	DLC				
Benzene	EPA-8021	2.1	1.0	1	UG/L	01/06/2012	DLC				
Toluene	EPA-8021	1.7	1.0	1	UG/L	01/06/2012	DLC				
Ethylbenzene	EPA-8021	6.5	1.0	1	UG/L	01/06/2012	DLC				
Xylenes	EPA-8021	9.6	3.0	1	UG/L	01/06/2012	DLC				
TPH-Diesel Range	NWTPH-DX w/ SGA	1300	540	1	UG/L	01/09/2012	EBS				
TPH-Oil Range	NWTPH-DX w/ SGA	1700	490	1	UG/L	01/09/2012	EBS				
						ANALYSIS A					
SURROGATE	METHOD	%REC				DATE	BY				
TFT	NWTPH-GX	106				01/06/2012	DLC				
TFT	EPA-8021	106				01/06/2012	DLC				
C25	NWTPH-DX w/ SGA	69.7				01/09/2012	EBS				

Chromatogram indicates that it is likely that sample contains weathered gasoline. Chromatogram indicates that it is likely that sample contians diesel and lube oil. Diesel and motor oil range product reporting limits raised due to low sample volume.

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CLIENT:	Landau Associates, Inc.	DATE:	1/23/2012
	130 - 2nd Ave. S.	ALS SDG#:	1201032
	Edmonds, WA 98020	WDOE ACCREDITATION:	C601
CLIENT CONTACT: CLIENT PROJECT:	Jeremy Davis Blaine Marina Bulkhead		

LABORATORY BLANK RESULTS

MBG-010612S - Batch 2422 - Soil by NWTPH-GX

			REPORTING	DILUTION		ANALYSIS A	ANALYSIS
ANALYTE	METHOD	RESULTS	LIMITS	FACTOR	UNITS	DATE	BY
TPH-Volatile Range	NWTPH-GX	U	3.0	1	MG/KG	01/06/2012	DLC

MBG-010512W - Batch 2417 - Water by NWTPH-GX

			REPORTING	DILUTION		ANALYSIS A	ANALYSIS
ANALYTE	METHOD	RESULTS	LIMITS	FACTOR	UNITS	DATE	BY
TPH-Volatile Range	NWTPH-GX	U	50	1	UG/L	01/05/2012	DLC

MB-010612S - Batch 2422 - Soil by EPA-8021

			REPORTING	DILUTION		ANALYSIS A	ANALYSIS
ANALYTE	METHOD	RESULTS	LIMITS	FACTOR	UNITS	DATE	BY
Benzene	EPA-8021	U	0.030	1	MG/KG	01/06/2012	DLC
Toluene	EPA-8021	U	0.050	1	MG/KG	01/06/2012	DLC
Ethylbenzene	EPA-8021	U	0.050	1	MG/KG	01/06/2012	DLC
Xylenes	EPA-8021	U	0.20	1	MG/KG	01/06/2012	DLC

MB-010512W - Batch 2417 - Water by EPA-8021

			REPORTING	DILUTION		ANALYSIS A	NALYSIS
ANALYTE	METHOD	RESULTS	LIMITS	FACTOR	UNITS	DATE	BY
Benzene	EPA-8021	U	1.0	1	UG/L	01/05/2012	DLC
Toluene	EPA-8021	U	1.0	1	UG/L	01/05/2012	DLC
Ethylbenzene	EPA-8021	U	1.0	1	UG/L	01/05/2012	DLC
Xylenes	EPA-8021	U	3.0	1	UG/L	01/05/2012	DLC

MB-010612S - Batch 2421 - Soil by NWTPH-DX

			REPORTING	DILUTION		ANALYSIS A	NALYSIS
ANALYTE	METHOD	RESULTS	LIMITS	FACTOR	UNITS	DATE	BY
TPH-Diesel Range	NWTPH-DX	U	25	1	MG/KG	01/06/2012	DLC
TPH-Oil Range	NWTPH-DX	U	50	1	MG/KG	01/06/2012	DLC

MB-010912W - Batch 2425 - Water by NWTPH-DX

			REPORTING	DILUTION		ANALYSIS A	NALYSIS
ANALYTE	METHOD	RESULTS	LIMITS	FACTOR	UNITS	DATE	BY
TPH-Diesel Range	NWTPH-DX	U	130	1	UG/L	01/09/2012	EBS
TPH-Oil Range	NWTPH-DX	U	250	1	UG/L	01/09/2012	EBS

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CLIENT:	Landau Associates, Inc. 130 - 2nd Ave. S.
	Edmonds, WA 98020
CLIENT CONTACT:	Jeremy Davis
CLIENT PROJECT:	Blaine Marina Bulkhead

DATE: 1/23/2012 ALS SDG#: 1201032 WDOE ACCREDITATION: C601

LABORATORY BLANK RESULTS

MB-010912S - Batch 2423 - Soil by EPA-6020

ANALYTE	METHOD	RESULTS	REPORTING LIMITS	DILUTION FACTOR	UNITS	ANALYSIS / DATE	ANALYSIS BY
Arsenic	EPA-6020	U	0.12	1	MG/KG	01/10/2012	RAL
Barium	EPA-6020	U	0.16	1	MG/KG	01/10/2012	RAL
Cadmium	EPA-6020	U	0.20	1	MG/KG	01/10/2012	RAL
Chromium	EPA-6020	U	0.12	1	MG/KG	01/10/2012	RAL
Lead	EPA-6020	U	0.12	1	MG/KG	01/10/2012	RAL
Selenium	EPA-6020	U	0.69	1	MG/KG	01/10/2012	RAL
Silver	EPA-6020	U	0.063	1	MG/KG	01/10/2012	RAL

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		UENT	IFICATE	OF ANALISIS			
CLIENT:	Landau Associates, Ir 130 - 2nd Ave. S.	nc.		DATE: ALS SDG#:	1/23/2012 1201032		
	Edmonds, WA 98020			WDOE ACCREDITATION:	C601		
CLIENT CONTACT:	Jeremy Davis						
CLIENT PROJECT:	Blaine Marina Bulkhea	ad					
	LABO	ORATORY	CONT	ROL SAMPLE RESULTS			
ALS Test Batch ID: 2	422 - Soil by NWTPH-0						
	··· ••••••				ANALYSIS	ANALYSIS	
SPIKED COMPOUND	METHOD	%REC	RPD	QUAL	DATE	BY	
TPH-Volatile Range - BS	NWTPH-GX	84.9			01/06/2012	DLC	
TPH-Volatile Range - BSD	NWTPH-GX	96.9	13		01/06/2012	DLC	
ALS Test Batch ID: 2	417 - Water by NWTPH	I-GX					
SPIKED COMPOUND	METHOD	%REC	RPD	QUAL	ANALYSIS DATE	ANALYSIS BY	
TPH-Volatile Range - BS	NWTPH-GX	103			01/05/2012	DLC	
TPH-Volatile Range - BSD	NWTPH-GX	105	2		01/05/2012	DLC	
ALS Test Batch ID: 2	422 - Soil by EPA-8021	l					
SPIKED COMPOUND	МЕТНОР	%REC	RPD	QUAL	ANALYSIS DATE	ANALYSIS BY	
Benzene - BS	EPA-8021	99.9	RPD	QUAL	01/06/2012	DLC	
Benzene - BSD	EPA-8021	100	0		01/06/2012	DLC	
Toluene - BS	EPA-8021 EPA-8021	95.8	v		01/06/2012	DLC	
Toluene - BSD	EPA-8021 EPA-8021	95.8 96.0	0		01/06/2012	DLC	
	EPA-8021 EPA-8021	96.0 93.0	U		01/06/2012	DLC	
Ethylbenzene - BS			4				
Ethylbenzene - BSD	EPA-8021	93.6	1		01/06/2012	DLC	
Xylenes - BS	EPA-8021	93.2			01/06/2012	DLC	
Xylenes - BSD	EPA-8021	93.7	1		01/06/2012	DLC	

ALS Test Batch ID: 2417 - Water by EPA-8021

SPIKED COMPOUND	METHOD	%REC	RPD	QUAL	ANALYSIS DATE	ANALYSIS BY	, 1
Benzene - BS	EPA-8021	108			01/05/2012	DLC	I
Benzene - BSD	EPA-8021	111	3		01/05/2012	DLC	I
Toluene - BS	EPA-8021	102			01/05/2012	DLC	I
Toluene - BSD	EPA-8021	105	3		01/05/2012	DLC	1
Ethylbenzene - BS	EPA-8021	100			01/05/2012	DLC	1
Ethylbenzene - BSD	EPA-8021	103	2		01/05/2012	DLC	1
Xylenes - BS	EPA-8021	99.9			01/05/2012	DLC	1
Xylenes - BSD	EPA-8021	103	3		01/05/2012	DLC	1

ALS Test Batch ID: 2421 - Soil by NWTPH-DX

SPIKED COMPOUND	METHOD	%REC	RPD	QUAL	ANALYSIS DATE	ANALYSIS BY	, ;
TPH-Diesel Range - BS	NWTPH-DX	95.9			01/06/2012	DLC	1
TPH-Diesel Range - BSD	NWTPH-DX	99.1	3		01/06/2012	DLC	1

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Page 9

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CLIENT:	Landau Associates, Inc. 130 - 2nd Ave. S. Edmonds, WA 98020
CLIENT CONTACT:	Jeremy Davis
CLIENT PROJECT:	Blaine Marina Bulkhead

DATE: 1/23/2012 ALS SDG#: 1201032 WDOE ACCREDITATION: C601

LABORATORY CONTROL SAMPLE RESULTS

ALS Test Batch ID: 2425 - Water by NWTPH-DX

	METHOD	0/ DE0		0.1.41	ANALYSIS DATE	ANALYSIS BY	
SPIKED COMPOUND TPH-Diesel Range - BS	METHOD NWTPH-DX	%REC 73.5	RPD	QUAL	01/09/2012	EBS	i.
TPH-Diesel Range - BSD	NWTPH-DX	78.7	7		01/09/2012	EBS	1

ALS Test Batch ID: 2423 - Soil by EPA-6020

SPIKED COMPOUND	METHOD	%REC	RPD	QUAL	ANALYSIS DATE	ANALYSIS BY	
Arsenic - BS	EPA-6020	98.9	KFU	QUAL	01/10/2012	RAL	I
Arsenic - BSD	EPA-6020	97.6	1		01/10/2012	RAL	I.
Barium - BS	EPA-6020	104	-		01/10/2012	RAL	1
Barium - BSD	EPA-6020	105	1		01/10/2012	RAL	I
Cadmium - BS	EPA-6020	101			01/10/2012	RAL	I
Cadmium - BSD	EPA-6020	101	0		01/10/2012	RAL	I
Chromium - BS	EPA-6020	102			01/10/2012	RAL	1
Chromium - BSD	EPA-6020	102	0		01/10/2012	RAL	1
Lead - BS	EPA-6020	103			01/10/2012	RAL	1
Lead - BSD	EPA-6020	103	0		01/10/2012	RAL	1
Selenium - BS	EPA-6020	96.3			01/10/2012	RAL	1
Selenium - BSD	EPA-6020	95.4	1		01/10/2012	RAL	1
Silver - BS	EPA-6020	108			01/10/2012	RAL	1
Silver - BSD	EPA-6020	108	1		01/10/2012	RAL	I

APPROVED BY

Laboratory Director

Page 10 ADDRESS 8620 Holly Drive, Suite 100, Everett, WA 98208 | PHONE 425-356-2600 | FAX 425-356-2626 ALS Laboratory Group A Campbell Brothers Limited Company

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ALS ENVIRONMENTAL

Sample Receiving Checklist

Client: Landau Associates	ALS Job #: _	18	10/02	32	-
Project: <u>Blaine Marina Bulkhead</u>					_
Received Date: 1/6/12 Received Time: 1/2	1:45	Ву: _	SN		_
Type of shipping container: Cooler <u>X</u> Box	Other				
Shipped via: UPS/FedEx US Postal Service	Courier	F	Iand Deli	vered 🗡	_
Were custody seals on outside of sample? If yes, how many? Where? Custody seal date: Seal name:		<u>Yes</u>	No	<u>N/A</u>	
Was Chain of Custody properly filled out (ink, signed, dated, e	etc.)?	X			
Did all bottles have labels?		X	,		
Did all bottle labels and tags agree with Chain of Custody?		X			
Were samples received within hold time?		X			
Did all bottles arrive in good condition (unbroken, etc.)?		<u> X</u>			
Was sufficient amount of sample sent for the tests indicated?			\mathbf{X} ,	see note see not	below
Was correct preservation added to samples?		<u></u>	X	see not	e below
If no, Sample Control added preservative to the following: <u>Sample Number</u> <u>Reagent</u> <u>Analyte</u> <u></u> <u></u> <u></u>					
Were VOA vials checked for absence of air bubbles? Bubbles present in sample #:				<u>×</u>	
Temperature of cooler upon receipt: $7, 5^{\circ}$	Cold Cool	Ambi			
Explain any discrepancies: <u>Sample # 10 had insuffec</u> Jeveny Said to 1 yr Gx + Dx Rist hold lemain	int Sample 1 my it any to	Volume Ym	for G metals	x, Dx, + m - Nothiy	stals. Left. RB
Was client contacted? <u>Yes</u> Who was called? <u>Tevenny</u>	By whom?	Rick 1	<u> Sogn</u> Dat	e: <u>1-6-18</u>	K
Outcome of call: Jeveny Sys Ivn Gx 4 Dx	first hol	ld met	dr,		

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(Laboratory Use Only) ALS Job#



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MEMORANDUM

To: Kent Wiken, Landau Associates

From: Jon Padvorac, PE

Date: August 11, 2017

File No.: 24-17-002

Port of Bellingham Blaine Bulkhead – Preliminary Engineering Design Subject: Memorandum For Department of Ecology Review Process

Background

Landau Associates (Landau) is currently working with the Port of Bellingham in the Blaine Harbor Industrial Area on the cleanup of a former fuel facility. The project includes excavation and removal of contaminated materials and installation of a water tight bulkhead on the shoreline alongside Sigurdson Avenue. The existing shoreline consists of older timber bulkheads. Riprap is placed waterward along the face of the existing bulkheads in some locations.

The new shoreline bulkhead will consist of a steel sheet pile, similar to an adjacent bulkhead installed in 2012. Interlock sealant or other means will be required to provide watertightness for the sheet pile joints and prevent groundwater migration through the wall. The wall will be designed for an undrained condition. This technical memorandum describes the preliminary design for the bulkhead and includes preliminary calculations. Final design and calculations will be provided with the final construction documents at a later date.

Preliminary Design

The new bulkhead will connect to and begin at the northern end of the previously placed sheet pile wall. The new bulkhead will installed along the shoreline just landward of the existing timber bulkhead. A site plan of the bulkhead alignment is provided in the main Landau report.

The new bulkhead will consist of sheet piling vibrated into place. A preliminary design of the bulkhead has been completed based on geotechnical information from Landau, a site observation of general site conditions, and information from the recent design and installation of the adjacent sheet pile wall.

The design for the new sheet pile wall is based on a ten-foot exposed height on the waterward face of the bulkhead. While the height of the exposed face is currently less than ten feet, the wall

will be designed to be stable in the event the rip rap and fill shifts or is removed from the waterward face of the bulkhead at some point in the future. The bulkhead will be a cantilevered design and will not include a tie-back system. The cantilevered bulkhead has been preliminary designed to support the full lateral loads from earth pressures, hydrostatic loads from retained groundwater, and vehicle loading from Sigurdson Avenue.

To the North of the bulkhead is an aging fish processing bulding. The new bulkhead will be as close as feasible to this building, which is anticipated to result in approximately a 47-foot long bulkhead that terminates approximately 10 feet away. In the event that this building or the supporting bulkhead and piling show signs of distress due to the vibrations caused by pile driving, bulkhead installation would cease. Were this to occur, the finished length of the bulkhead may be less than the targeted 47 feet.

The sheet piling section will be a steel PZC 13 section or approved equal. The top portion of the sheets will be coated to protect from corrosion. This is similar to the adjacent steel sheet piling section that was installed in 2012. The new sheet piling will be connected to the north end of the existing sheet pile bulkhead. The new sheets will be driven from the south to the north to install the new bulkhead. There is a risk that unknown buried conditions could impact installation. If unknown conditions are encountered during installation such as boulders or hard driving, minor adjustments in the alignment or configuration of the bulkhead may be performed in the field during construction.

The joints where the individual sheet pile sections connect will be treated to provide a watertight bulkhead. The treatment will be a non-toxic, environmentally-friendly interlock sealant that provides watertight connections between the individual sheets. The sealant will be applied to the joints prior to driving the sheets.

Based on the calculations attached, geotechnical information, and the performance and installation process of the adjacent similar sheet pile bulkhead, it is expected that the new sheet pile bulkhead as designed will meet code and performance requirements to support the load conditions on the site. The use of watertight sealant in the sheet pile joints will prevent migration of potentially contaminated groundwater through the new bulkhead.

Calculations

Preliminary calculations and typical details are attached.



Jon A. Padvorac, P.E., C.W.I. Project Engineer

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MEMORANDUM

To: Kent Wiken, Landau Associates

From: Jon Padvorac, PE

Date: August 11, 2017

File No.: 24-17-002

Port of Bellingham Blaine Contaminated Soil Removal Shoring – Preliminary Engineering Design Subject: Memorandum For Department of Ecology Review Process

Background

Landau Associates (Landau) is currently working with the Port of Bellingham in the Blaine Harbor Industrial Area on the cleanup of a former fuel facility. The project includes excavation and removal of contaminated materials and installation of a watertight bulkhead on the shoreline alongside Sigurdson Avenue.

The removal of contaminated soil materials will include excavation of material up to twelve feet below the ground surface. In order to provide safety and remove the contaminated soils in a controlled manner and protect adjacent utilities and infrastructure, shoring will be provided in the excavations. This technical memorandum describes the preliminary design for the shoring and includes preliminary calculations. Final design and calculations for a shoring system will be provided with the final construction documents at a later date.

Preliminary Design

The shoring will consist of temporary steel sheet piling installed around the area to be excavated and removed. The shoring will be vibrated into place prior to the excavation and removal of contaminated soils. The shoring will not have a tie-back system but may include temporary bracing from within the excavation area. The design for the temporary shoring is based on 12-foot exposed height which includes the expected maximum excavation depth of twelve feet with a factor of safety.

The shoring is designed to support the full lateral loads from earth pressures, hydrostatic loads from groundwater, and vehicle loading from equipment. The sheet piling section will be a steel PZC-18 section or approved equal.

Based on the calculations attached, and geotechnical information, it is expected that the temporary shoring as designed will meet code and performance requirements to support the temporary load conditions on the site. There is a risk that unknown buried conditions could impact installation. If unknown conditions are encountered during installation such as boulders or hard driving, minor adjustments in the alignment or configuration of the shoring may be performed in the field during construction.

Calculations

Preliminary calculations and typical details are attached.

h:\24wf\2017\002 landau pob blaine bulkhead\reports\pob blaine shoring prelim tech memo.docx\jap



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TYPICAL BULKHEAD DETAILS - BULKHEAD AND SHORING

PORT OF BELLINGHAM - BLAINE HARBOR BULKHEAD

<u>NOTES</u>

<u>VERTICAL DATUM</u>: ELEVATIONS SHOWN ARE REFERENCED TO THE NOAA/TIDAL MLLW = 0.00' DATUM, BASED UPON SURVEY DATA PROVIDED BY WILSON ENGINEERING.



BLAINE FUEL BULKHEAD

Owner: Port of Bellingham

Date: August 10, 2017

Prepared for: Port of Bellingham

STRUCTURAL CALCULATIONS



Jon A. Padvorac, P.E., C.W.I. Project Engineer

Prepared By:

Jon Padvorac, P.E.

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Sheet <u>1</u> of <u>1</u>
Design by KMG
Date 8/2017
Checked by LKL
Date 8/2017

TABLE OF CONTENTS

Section

- A. Design Criteria
- B. Geotechnical Loads
- C. Bulkhead Design

BLAINE FUEL BULKHEAD

Owner: Port of Bellingham

Date: August 10, 2017

Prepared for: Port of Bellingham

DESIGN CRITERIA



Jon A. Padvorac, P.E., C.W.I. Project Engineer

Prepared By:

Jon Padvorac, P.E.



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File No. 242017.002



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Client	Port of Bellingham	Sheet of
Project	Blaine Harbor Bulkhead	Design by KMG
	Structural Design Criteria	Date 08/17
		Checked by LKL
Project N	0. 242017.002	Date 08/17

CODES AND REFERENCES	
 2015 International Building Code ASCE 7 10 Minimum Design Lease 	de for Duildings and Other Structures
 ASCE 7-10 Minimum Design Loa 	ds for Buildings and Other Structures
Steel	
 AISC Steel Construction Manual, 	14 th Edition (2010)
COMPUTER PROGRAMS	
 Shoring Suite by CivilTech Software 	are
MATERIAL PROPERTIES	
Concrete	
Туре	Normal Weight
Bulkhead Wall	$f_{c} = 4,000 \text{ psi}$
Reinforcing Steel	
Typical	ASTM A615, Grade 60
Structural Steel	
Sheet Piling	ASTM A572, Grade 50
FOUNDATIONS AND SOILS	
Reference Geotechnical Report:	Blaine Marine Fuel Pier
1	Bulkhead Replacement
	Blaine, Washington
	Landau Associates, Inc.
Bulkhead Wall	
Passive Lateral Pressure	Varies, See Lateral Pressures Diagram
Active Lateral Pressure:	Varies, See Lateral Pressures Diagram
Hydrostatic Pressure:	125 PCF, See Lateral Pressures Diagram
Active Surcharge Pressure:	0.36*q _s , See Lateral Pressures Diagram
Seismic Earth Pressure:	7H to 2H, Se Lateral Pressures Diagram

BLAINE FUEL BULKHEAD

Owner: Port of Bellingham

Date: August 10, 2017

Prepared for: Port of Bellingham

GEOTECHNICAL LOADS



Jon A. Padvorac, P.E., C.W.I. Project Engineer

Prepared By:

Jon Padvorac, P.E.



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File No. 242017.002



Client PORT OF BELLING HAM Project BLAINE BULHEAD Permanent Bulkhead

Sheet of Design by KMG 8/17 Date Checked by JAP Date 8/11/17

Project No. 242017.002

DESIGN LATERAL PRESSURES . 9 FOOT HIGH W/ WATER TABLE AT 3 BGS DESIGN PRESURES WERE PROVIDED FOR A 9' HIGH RETAINING HEGHT ON A REPORT BY LANDAU ASSOCIATES DATED APRIL 6,2012. FOR THE SLEWARD WHERE THE WATER TABLE IS LOCATED 3' BELOW GROUND SURFICE THE DESIGN PRESSURE WHICH INCLUDE THE HYDROSTATIC PRESSURE WAS EXTRAPOLATED ROM DELIGN PLESSURES PROVIDED BY LANDAU AS SHOWN BELOW. 95 0.3695 TH 0 133 240 9! .1 Alath 24 255 D1= 16" 16D1 255+4 Di 375 300+14 D, 4 24201-D2 4 300 + 190, + 18 Dz 242 D1 + 221 D2 NOT TO SCALE ALL UNITS ARE IN ENGLISH (F+, 16, PSF)



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BLAINE FUEL BULKHEAD

Owner: Port of Bellingham

Date: August 10, 2017

Prepared for: Port of Bellingham

BULKHEAD DESIGN



Jon A. Padvorac, P.E., C.W.I. Project Engineer

Prepared By:

Jon Padvorac, P.E.



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File No. 242017.002

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2	25.00	3.87	26.69	174.90	0.2207	
UNITS: Width/Spacing/Dia UNITS: Friction/Bearing/Pr	meter/Len ressure - ksl	gth/Depth - 1 f, Pres. Slope	ft, Force - kip, e - kip/ft3, Def	Moment - kip flection - in	ŀft,	



report SHORING WALL CALCULATION SUMMARY The leading shoring design and calculation software Software Copyright by CivilTech Software www.civiltechsoftware.com ShoringSuite Software is developed by CivilTech Software, Bellevue, WA, USA. The calculation method is based on the following references: 1. FHWA 98-011, FHWA-RD-97-130, FHWA SA 96-069, FHWA-IF-99-015 2. STEEL SHEET PILING DESIGN MANUAL by Pile Buck Inc., 1987 3. DESIGN MANUAL DM-7 (NAVFAC), Department of the Navy, May 1982 4. TRENCHING AND SHORING MANUAL Revision 12, California Department of Transportation, January 2000
 EARTH SUPPORT SYSTEM & RETAINING STRUCTURES, Pile Buck Inc. 2002
 DESIGN OF SHEET PILE WALLS, EM 1110-2-2504, U.S. Army Corps of Engineers, 31 March 1994 7. EARTH RETENTION SYSTEMS HANDBOOK, Alan Macnab, McGraw-Hill. 2002 8. AASHTO HB-17, American Association of State and Highway Transportation Officials, 2 September 2002 UNITS: Width/Spacing/Diameter/Length/Depth - ft, Force - kip, Moment - kip-ft, Friction/Bearing/Pressure - ksf, Pres. Slope - kip/ft3, Deflection - in _____ -----4324324234 Licensed to 3424343 Date: 8/10/2017 File: C:\Users\kgalvez\Documents\Blaine Bulkhead\10' Wall - Varying Heights\170720 Blaine Sheetpile - 10' Wall - 3 BGS.sh8 Title: BLAINE HARBOR Subtitle: Sheet Pile Bulkhead Wall Type: 1. Sheet Pile Wall Height: 9.00 Pile Diameter: 1.00 Pile Spacing: 1.00 Free Spacing: 1.00
 Factor of Safety (F.S.): 1.50
 Max. Moment reduce 20%
 Lateral Support Type (Braces): 1. No
 Top Brace Increase (Multi-Bracing): Add 15%*
 Embedment Option: 1. Yes Friction at Pile Tip: No* Pile Properties: Allowable Fb/Fy: 0.66 Steel Strength, Fy: 50 ksi = 345 MPa Elastic Module, E: 29000.00 Moment of Inertia, I: 84.40 User Input Pile: PZ22 * DRIVING PRESSURE (ACTIVE, WATER, & SURCHARGE) * No. Z2 top Top Pres. Z2 bottom Bottom Pres. SI ope 1 0.00 0.00 3.00 0. 13 0.0443 3.00 2 3 9.00 0.24 0. 13 0.0175 9.00 0.25 25.00 0.51 0.0160 4 5 25.00 0.60 800.00 14.53 0.0180 0.38 3.00 0.00 9.00 0.0625 6 9.00 0.38 0.38 800.00 0.0000 9.00 7 0.00 0.11 0. 11 0.0000 9.00 8 0.00 0.06 0.02 -0.0050
report * PASSIVE PRESSURE * Top Pres. Z2 bottom No. Z1 top Bottom Pres. SI ope _ _ _ _ _ _ _ _ _ 9.00 5.06 0.00 25.00 3.87 800.00 0.3160 1 174.90 25.00 2 0.2207 _____ The pressure above will be divided by a Factor of Safety =1.5 * ACTIVE SPACE * No. Z depth Spaci ng -----0.00 1.00 1 2 9.00 1.00 _____ * PASSIVE SPACE * Lucpin Spacing -----1 9.00 1.00 *For Tieback: Input1 = Diameter; Input2 = Bond Stength
*For Plate: Input1 = Diameter; Input2 = Allowable Pressure
*For Deaman: Input1 = Horz. Width; Input2 = Allowable Pressure; Angle = 0 The calculated moment and shear are per pile spacing. Sheet piles are per one feet or meter; Soldier piles are per pile. Top Pressures start at depth = 0.00D1=0.00 D2=9.00 == | == D3=30.23 D1 - TOP DEPTH D2 - EXCAVATION BASE D3 - PILE TIP (20% increased, see EMBEDMENT Notes below) MOMENT BALANCE: M=0.00 AT DEPTH=26.69 WITH EMBEDMENT OF 17.69 FORCE BALANCE: F=0.00 AT DEPTH=30.23 WITH EMBEDMENT OF 21.23 The program calculates embedment for moment equilibrium, then increased by 20% to reach force equilibrium. Total Passive Pressure = Total Active Pressure, OK! * EMBEDMENT Notes * Based on USS Design Manual, fist calculate embedment for moment equilibrium, then increased by 20 to 40 % to reach force equilibrium. The embedment for moment equilibrium is 17.69 The 20% increased embedment for force equilibrium is 21.23 (Used by Program) The 30% increased embedment for force equilibrium is 23.00 The 40% increased embedment for force equilibrium is 24.77

report Based on AASHTO Standard Specifications, fist calculate embedment for moment equilibrium, then add safety factor of 30% for temporary shoring; add safety factor of 50% for permanent shoring. The embedment for moment equilibrium is 17.69 Add 30% embedment for temporary shoring (FS=1.3) is 23.00 Add 50% embedment for permanent shoring (FS=1.5) is 26.54 PROGRAM RECOMMENDED MINIMUM EMBEDMENT = 21.23 TOTAL MINIMUM PILE LENGTH = 30.23 * MOMENT IN PILE (per pile spacing)* Overall Maximum Moment = 49.83 at 19.24 Maximum Shear = 13.90Moment and Shear are per pile spacing: 1.0 feet or meter * VERTICAL LOADING * Vertical Loading from Braces = 0.00 Vertical Loading from External Load = 0.00 Total Vertical Loading = 0.00 Request Min. Section Modulus = 18.1 in3/feet, Fy= 50 ksi = 345 MPa, Fb/Fy=0.66 The pile selection is based on the magnitude of the moment only. Axial force is negl ected. Sx(in3) and lx(in4) are per one foot of horizontal width of the pile * Note: The sheet pile properties are in English Units and based on one foot width (even in Metric unit). SPZ22 | x= 77 | x= 72.7 Sx= 18.3 Weight= 43.28 Top Deflection= 3.77 CZ113 Sx= 18.4 Weight= 41.7 Top Deflection= 3.99 Weight= 48.6 Sx= 19.3 I x= 91.9 SZ22 Top Deflection= 3.16 SPZ23.5 Sx= 19.3 I x= 81.2 Weight= 46.76 Top Deflection= 3.57 2NRD3 Sx= 20.1 I x= 92.7 Weight = 34.43 Top Deflection= 3.13 Sx= 20.62 l x= 111.53 SZ313 Weight= 40.4 Top Deflection= 2.60 Top Deflection= 2.93 2N Sx= 21.4 |x= 99 Weight= 36.42 I x= 106.4 I x= 109.9 Top Deflection= 2.73 Sx= 22.3 Sx= 22.3 Weight= 37.7 BZ12 Weight= 40.92 H116 Top Deflection= 2.64 Top Deflection= 2.39 Sx= 22.4 I x= 121.45 Weight= 44.1SZ340 BZ12.1L Sx= 22.5 l x= 115.5 Weight= 43.27 Top Deflection= 2.51 SZ350 Sx= 22.96 I x= 124.62 Weight= 45.3 Top Deflection= 2.33 Sx= 24.2 AZ13 |x = 144.3Weight= 21.92 Top Deflection= 2.01 Sx= 24.2 Weight = 50.4PZC13 |x = 152|Top Deflection= 1.91 *******SHEAR, MOMENT, AND DEFLECTION v.s. DEPTH*********** The shear and moment are per single soldier pile (secant/tangent pile) or one foot of sheet pile (concrete wall). The deflection is based on users input pile below: User Input Pile: PZ22 Elastic Module, E: 29000.00 Moment of Inertia, I: 84.40 DEPTH SHEAR MOMENT No DEFLECTI ON ft kip-ft ki p in 1 0.00 0.00 0.00 3.438 2 0.04 0.01 0.00 3.431 0.01 3.424 3 0.08 0.00 4 0.11 0.02 0.00 3.416 5 0.15 0.03 0.00 3.409

6

0.19

0.03

0.00

3.402 Page 3



Sheet Pile Section Properties										
Nominal Width (in)		rea n²)		ight os)		of Inertia ¹⁴)		Modulus n ³)		e Area / ft)
	Single Section	Per Linear Foot of Wall	Per Foot of Sheet	Per Square Foot	Single Section	Per Linear Foot of Wall	Single Section	Per Linear Foot of Wall	Total Area	Nominal Coating Area *
27.88	14.82	6.38	50.4	21.7	353.0	152.0	56.2	24.2	6.10	5.60

* Excludes socket interior & ball of interlock.

Available Material Grades: ASTM A572 Grade 50 and 60, Also A588 and A690.

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REVISION



$\begin{array}{c} 0.237\\ 0.3382\\ 0.000\\ 0$
$\begin{array}{c} 0.\ 04\\ 0.\ 05\\ 0.\ 06\\ 0.\ 07\\ 0.\ 08\\ 0.\ 07\\ 0.\ 08\\ 0.\ 07\\ 0.\ 08\\ 0.\ 07\\ 0.\ 08\\ 0.\ 07\\ 0.\ 08\\ 0.\ 07\\ 0.\ 08\\ 0.\ 07\\ 0.\ 08\\ 0.\ 07\\ 0.\ 08\\ 0.\ 07\\ 0.\ 08\\$
$ \begin{array}{c} 0. \ 00 \\ 0. \ 01 \\ 0. \ 01 \\ 0. \ 01 \\ 0. \ 02 \\ 0. \ 02 \\ 0. \ 03 \\ 0. \ 03 \\ 0. \ 04 \\ 0. \ 05 \\ 0. \ 06 \\ 0. \ 07 \\ 0. \ 08 \\ 0. \ 08 $
report 3. 395 3. 387 3. 380 3. 373 3. 366 3. 358 3. 351 3. 344 3. 337 3. 329 3. 322 3. 315 3. 308 3. 300 3. 293 3. 286 3. 279 3. 271 3. 264 3. 257 3. 264 3. 257 3. 264 3. 257 3. 228 3. 221 3. 228 3. 221 3. 228 3. 221 3. 235 3. 228 3. 221 3. 213 3. 206 3. 199 3. 192 3. 185 3. 177 3. 170 3. 163 3. 163 3. 156 3. 148 3. 141 3. 134 3. 127 3. 170 3. 163 3. 156 3. 148 3. 141 3. 127 3. 105 3. 098 3. 090 3. 083 3. 076 3. 090 3. 083 3. 076 3. 090 3. 083 3. 076 3. 090 3. 083 3. 076 3. 098 3. 097 3. 003 2. 996 2. 989 2. 985 3. 011 3. 003 2. 996 2. 989 2. 989 2. 989 2. 985 3. 011 3. 003 3. 025 3. 018 3. 011 3. 003 2. 996 2. 989 2. 989 2. 989 2. 989 2. 989 2. 985 3. 011 3. 003 3. 025 3. 018 3. 011 3. 003 3. 025 3. 018 3. 011 3. 003 2. 989 2. 989 2. 989 2. 989 2. 989 2. 985 3. 018 3. 011 3. 003 3. 011 3. 003 3. 025 3. 018 3. 011 3. 01

107 108 109 110 111 112 113	$\begin{array}{c} 2.\ 61\\ 2.\ 69\\ 2.\ 76\\ 2.\ 76\\ 2.\ 76\\ 2.\ 76\\ 2.\ 76\\ 2.\ 76\\ 2.\ 76\\ 2.\ 76\\ 2.\ 76\\ 2.\ 76\\ 2.\ 76\\ 2.\ 76\\ 2.\ 76\\ 2.\ 76\\ 2.\ 76\\ 2.\ 76\\ 2.\ 76\\ 2.\ 76\\ 3.\ 76\\$	$\begin{array}{c} 0.58\\ 0.62\\ 0.64\\ 0.66\\ 0.66\\ 0.66\\ 0.66\\ 0.66\\ 0.77\\ 0.72\\ 0.77\\ 0.78\\ 0.88\\ 0.88\\ 0.88\\ 0.99\\ 0.91\\ 0.93\\ 0.94\\ 0.99\\ 1.02\\$	$\begin{array}{c} 0.\ 70\\ 0.\ 72\\ 0.\ 75\\ 0.\ 77\\ 0.\ 82\\ 0.\ 84\\ 0.\ 89\\ 0.\ 91\\ 0.\ 92\\ 1.\ 05\\ 1.\ 08\\ 1.\ 10\\ 1.\ 13\\ 1.\ 12\\ 1.\ 25\\ 1.\ 32\\ 1.\ 35\\ 1.\ 45\\ 1.\ 55\\ 1.\ 58\\ 1.\ 55\\ 1.\ 58\\ 1.\ 66\\ 1.\ 77\\ 1.\ 85\\ 1.\ 93\\ 1.\ 97\\ 2.\ 01\\ 2.\ 05\\ 1.\ 05\\ 1.\ 97\\ 2.\ 05\\ 1.\ 0.\ 05\\ 1.\ 0.\ 05\\ 1.\ 0.\ 05\\ 1.\ 0.\ 05\\ 1.\ 0.\ 05\\ 1.\ 0.\ 05\\ 1.\ 0.\ 05\\ 1.\ 0.\ 05\\ 1.\ 0.\ 05\\ 1.\ 0.\ 0.\ 05\\ 1.\ 0.\ 0.\ 0.\ 0.\ 0.\ 0.\ 0.\ 0.\ 0.\ 0$	report 2. 938 2. 931 2. 924 2. 916 2. 909 2. 902 2. 895 2. 888 2. 880 2. 873 2. 866 2. 859 2. 851 2. 844 2. 837 2. 822 2. 815 2. 808 2. 873 2. 793 2. 779 2. 775 2. 757 2. 757 2. 757 2. 757 2. 757 2. 743 2. 721 2. 707 2. 699 2. 692 2. 685 2. 671 2. 663 2. 656 2. 649 2. 634 2. 627	
106 107 108 109 110	3.98 4.01 4.05 4.09 4.13 4.17 4.20	1.01 1.02 1.04 1.05 1.06 1.08 1.08	1.77 1.81 1.85 1.89 1.93 1.97 2.01	2.678 2.671 2.663 2.656 2.649 2.642 2.634	

1345. 041355. 071365. 111375. 151385. 191395. 231405. 261415. 301425. 341435. 381445. 421455. 451465. 491475. 531485. 571495. 601505. 641515. 681525. 721535. 791555. 831565. 871575. 911585. 951606. 021616. 061626. 101636. 131646. 171656. 291686. 321696. 361706. 401716. 481736. 511756. 591766. 631776. 641816. 821826. 851836. 931857. 041887. 081897. 121907. 161917. 231937. 271947. 31
$\begin{array}{c} 1.43\\ 1.43\\ 1.55\\ 5.579\\ 1.555\\ 5.579\\ 1.555\\ 5.579\\ 1.555\\ 5.579\\ 1.555\\ 5.579\\ 1.555\\ 5.579\\ 1.555\\ 5.579\\ 1.555\\ 5.579\\ 1.577\\ 7.779\\ 1.585\\ 7.779\\ 1.585\\ 7.779\\ 1.585\\ 7.779\\ 1.585\\ 7.779\\ 1.585\\ 7.779\\ 1.585\\ 7.779\\ 1.585\\ 7.779\\ 1.585\\ 7.779\\ 1.585\\ 7.779\\ 1.585\\ 7.779\\ 1.585\\ 7.779\\ 1.585\\ 7.779\\ 1.585\\ 7.79\\ 7.79\\ 1.585\\ 1.585\\ 1.585\\ 1.585\\ 1.585\\ 1.585\\ 1.585\\ 1.585\\ 1.585\\ 1$
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report 2. 483 2. 476 2. 469 2. 469 2. 469 2. 469 2. 440 2. 443 2. 4440 2. 443 2. 4440 2. 443 2. 4440 2. 439 2. 2411 2. 200 2. 2

259 260 261 262 263 264 265 266 267 277 273 274 275 277 278 280 281 283 285 287 289 291 292 293 295 297 299 300 302 303 304 305 307 309 311 213 314 315 317 318 319	$\begin{array}{c} 9.\ 77\\ 9.\ 81\\ 9.\ 85\\ 9.\ 88\\ 9.\ 92\\ 9.\ 96\\ 10.\ 04\\ 10.\ 07\\ 10.\ 15\\ 10.\ 22\\ 10.\ 34\\ 10.\ 45\\ 10.\ 57\\ 10.\ 64\\ 10.\ 75\\ 10.\ 64\\ 10.\ 75\\ 10.\ 87\\ 10.\ 91\\ 10.\ 91\\ 10.\ 98\\ 11.\ 25\\ 11.\ 28\\ 11.\ 25\\ 11.\ 25\\ 11.\ 55\\ 11.\ 63\\ 11.\ 74\\ 11.\ 55\\ 11.\ 63\\ 11.\ 74\\ 11.\ 78\\ 11$	$\begin{array}{c} 4.2245\\ 4.2245\\ 7.912\\ 4.4.4\\ $	$\begin{array}{c} 16.\ 07\\ 16.\ 23\\ 16.\ 39\\ 16.\ 55\\ 16.\ 71\\ 16.\ 87\\ 17.\ 03\\ 17.\ 20\\ 17.\ 36\\ 17.\ 53\\ 17.\ 69\\ 18.\ 36\\ 19.\ 20\\ 19.\ 37\\ 19.\ 54\\ 19.\ 06\\ 20.\ 23\\ 20.\ 41\\ 20.\ 58\\ 20.\ 75\\ 21.\ 43\\ 21.\ 45\\ 21.\ 43\\ 21.\ 45\\ 21.\ 43\\ 21.\ 45\\ 22.\ 51\\ 23.\ 23.\ 23\\ 23.\ 58\\ 23.\ 75\\ 23.\ 23.\ 58\\ 23.\ 75\\ 25.\$	report 1.596 1.589 1.582 1.575 1.569 1.555 1.569 1.555 1.569 1.555 1.555 1.555 1.555 1.558 1.552 1.555 1.558 1.552 1.550 1.550 1.550 1.502 1.495 1.480 1.420 1.420 1.420 1.440 1.420 1.440 1.420 1.420 1.420 1.420 1.320 1.320 1.330 1.330 1.330 1.330 1.330 1.330 1.330 1.330 1.330 1.330 1.320 1.220 1.220 1.220 1.220 1.220 1.220 1.20
318	12.00	4.79	26.29	1. 209

322 12.16 4.79 27.02 1.184 323 12.19 4.79 27.20 1.178 324 12.23 4.79 27.38 1.172 325 12.27 4.79 27.56 1.166 326 12.31 4.79 27.92 1.153 328 12.38 4.79 28.29 1.141 330 12.46 4.79 28.29 1.141 330 12.46 4.79 28.65 1.129 331 12.50 4.78 28.83 1.123 333 12.57 4.78 29.01 1.117 334 12.665 4.78 29.37 1.004 335 12.65 4.78 29.37 1.004 336 12.69 4.77 29.73 1.092 338 12.76 4.77 29.92 1.086 339 12.80 4.76 30.10 1.080 340 12.84 4.76 30.46 1.062 341 12.99 4.74 31.00 1.056 344 12.99 4.74 31.35 1.038 347 13.10 4.72 31.35 1.038 347 13.22 4.70 32.07 1.014 346 13.06 4.73 31.35 1.032 348 12.99 4.74 31.00 1.020 350 13.22 4.76 32.25 1.009 351 13.25 4.69 32.2
326 12.31 4.79 27.74 1.160 327 12.35 4.79 27.92 1.153 328 12.38 4.79 28.10 1.147 329 12.42 4.79 28.29 1.141 330 12.46 4.79 28.47 1.135 331 12.50 4.79 28.65 1.129 332 12.53 4.78 29.01 1.117 334 12.61 4.78 29.19 1.104 336 12.65 4.78 29.919 1.104 336 12.69 4.77 29.55 1.098 337 12.72 4.77 29.73 1.092 338 12.66 4.77 29.92 1.086 339 12.80 4.76 30.10 1.080 344 12.99 4.74 30.82 1.074 341 12.88 4.75 30.46 1.068 342 12.91 4.75 30.46 1.062 343 12.95 4.74 31.00 1.056 344 12.99 4.74 31.00 1.026 345 13.03 4.73 31.35 1.038 347 13.18 4.71 31.89 1.026 344 12.99 4.68 32.42 1.003 355 13.24 4.67 32.78 997 356 13.44 4.67 32.78 997 355 13.41 4.66 32.95 </td
$\begin{array}{cccccccccccccccccccccccccccccccccccc$
35913.564.6233.660.96236013.594.6133.830.95636113.634.6034.010.95036213.674.5934.180.94536313.714.5834.350.93936413.754.5734.530.933
36213.674.5934.180.94536313.714.5834.350.93936413.754.5734.530.933
364 13.75 4.57 34.53 0.933
366 13.82 4.55 34.87 0.922
36713.864.5435.050.91636813.904.5235.220.910
36913.944.5135.390.90537013.974.5035.560.89937114.014.4935.730.893
37214.054.4735.900.88837314.094.4636.070.88237414.124.4536.240.877
37514. 164. 4336. 400. 87137614. 204. 4236. 570. 86637714. 244. 4036. 740. 860
37814. 284. 3936. 910. 85537914. 314. 3737. 070. 849
380 14. 35 4. 36 37. 24 0. 844 381 14. 39 4. 34 37. 40 0. 838 382 14. 43 4. 33 37. 57 0. 833
383 14. 47 4. 31 37. 73 0. 827 384 14. 50 4. 29 37. 89 0. 822 Page 9

$\begin{array}{c} 385\\ 386\\ 387\\ 388\\ 390\\ 391\\ 392\\ 393\\ 395\\ 396\\ 397\\ 398\\ 390\\ 401\\ 402\\ 403\\ 404\\ 405\\ 406\\ 407\\ 408\\ 409\\ 410\\ 411\\ 412\\ 413\\ 416\\ 417\\ 418\\ 422\\ 423\\ 424\\ 425\\ 426\\ 427\\ 428\\ 429\\ 430\\ 431\\ 432\\ 433\\ 435\\ 436\\ 437\\ 438\\ 436\\ 441\\ 442\\ 442\\ 442\\ 442\\ 442\\ 442\\ 442$	$\begin{array}{c} 14.54\\ 14.66\\ 14.69\\ 14.77\\ 14.88\\ 14.66\\ 14.77\\ 14.88\\ 14.96\\ 15.00\\ 15.15\\ 15.15\\ 15.15\\ 15.15\\ 15.15\\ 15.55\\ 15$	$\begin{array}{c} 4. & 28 \\ 4. & 24 \\ 4. & 21 \\ 4. & 4. \\ 4. & 175 \\ 4. & 107 \\ 4. & 107 \\ 4. & 107 \\ 4. & 107 \\ 4. & 107 \\ 4. & 107 \\ 4. & 107 \\ 1. & 107$	$\begin{array}{c} 38.\ 05\\ 38.\ 38\\ 39.\ 07\\ 39.\ 39.\ 39.\ 39.\ 39.\ 39.\ 39.\ 39.\$	report 0.816 0.811 0.806 0.795 0.789 0.778 0.778 0.778 0.768 0.763 0.753 0.774 0.768 0.763 0.753 0.742 0.737 0.722 0.711 0.701 0.696 0.681 0.661 0.662 0.662 0.662 0.662 0.662 0.663 0.663 0.665 0.662 0.663 0.665 0.663 0.665 0.665 0.663 0.665 0.665 0.665 0.665 0.665 0.665 0.665 0.665 0.665 0.665 0.665 0.665 0.665 0.665 0.665 0.665 0.665 0.665 0.655 0.555
438	16. 55	2. 98	45.47	0. 553
439	16. 59	2. 95	45.58	0. 548
440	16. 62	2. 92	45.69	0. 544

5112345555555555555555555555555555555555	$\begin{array}{c} 19.\ 31\\ 19.\ 35\\ 19.\ 39\\ 19.\ 43\\ 19.\ 50\\ 19.\ 58\\ 19.\ 65\\ 19.\ 69\\ 19.\ 73\\ 19.\ 71\\ 19.\ 84\\ 19.\ 92\\ 19.\ 93\\ 19.\ 93\\ 20.\ 07\\ 20.\ 11\\ 20.\ 15\\ 20.\ 20.\ 34\\ 20.\ 37\\ 20.\ 41\\ 20.\ 45\\ 20.\ 56\\ 20.\ 64\\ 20.\ 75\\ 20.\ 64\\ 20.\ 79\\ 20.\ 79\\ 20.\ 79\\ 20.\ 83\\ 20.\ 79\\ 20.\ 79\\ 20.\ 83\\ 20.\ 79\\ 20.\ 79\\ 20.\ 83\\ 20.\ 94\\ $	$\begin{array}{c} -0.\ 08\\ -0.\ 13\\ -0.\ 29\\ -0.\ 35\\ -0.\ 45\\ -0.\ 56\\ -0.\ 627\\ -0.\ 73\\ -0.\ 78\\ -0.\$	$\begin{array}{c} 49.\ 832\\ 49.\ 822\\ 49.\ 822\\ 49.\ 822\\ 49.\ 822\\ 49.\ 822\\ 49.\ 822\\ 49.\ 822\\ 49.\ 822\\ 49.\ 822\\ 49.\ 822\\ 49.\ 822\\ 49.\ 72\\ 49.\ 72\\ 49.\ 72\\ 49.\ 72\\ 49.\ 67\\ 49.\ 552\\ 49.\ 49.\ 552\\ 49.\ 49.\ 552\\ 49.\ 49.\ 552\\ 49.\ 49.\ 552\\ 49.\ 49.\ 31\\ 49.\ 31\\ 49.\ 31\\ 49.\ 31\\ 49.\ 31\\ 49.\ 31\\ 49.\ 31\\ 49.\ 31\\ 49.\ 31\\ 48.\ 823$	report 0. 275 0. 272 0. 269 0. 266 0. 263 0. 257 0. 254 0. 251 0. 248 0. 245 0. 242 0. 242 0. 237 0. 234 0. 237 0. 234 0. 237 0. 228 0. 220 0. 207 0. 207 0. 204 0. 207 0. 207 0. 204 0. 207 0. 199 0. 197 0. 194 0. 182 0. 187 0. 175 0. 175 0. 155 0. 155 0. 148 0. 144 0. 142 0. 140 0. 144 0. 142 0. 140 0. 142 0. 140 0. 144 0. 142 0. 140 0. 144 0. 142 0. 140 0. 14
558	21.09	-2.84	47.32	0. 152
559	21.13	-2.91	47.21	0. 150
560	21.17	-2.97	47.10	0. 148
561	21.21	-3.04	46.98	0. 146
562	21.24	-3.10	46.87	0. 144
563	21.28	-3.17	46.75	0. 142

F7 4	21 70	2 02	45 07	report
574	21. 70	-3.92	45. 27	0. 120
575	21. 74	-3.99	45. 12	0. 119
576	21. 77	-4.06	44. 97	0. 117
577 578	21.81 21.85	-4.13 -4.20	44.81 44.66	0. 115 0. 113 0. 111
579	21. 89	-4.27	44.50	0. 111
580	21. 93	-4.34	44.33	0. 110
581	21. 96	-4.42	44.17	0. 108
582	22.00	-4.49	44.00	0. 106
583	22.04	-4.56	43.83	0. 105
584	22. 08	-4.63	43.65	0. 103
585	22. 12	-4.71	43.48	0. 101
586	22. 15	-4.78	43.30	0. 100
587	22. 19	-4.85	43. 11	0. 098
588	22. 23	-4.93	42. 93	0. 096
589	22. 27	-5.00	42.74	0. 095
590	22. 30	-5.07	42.55	0. 093
591	22. 34	-5.15	42.36	0. 092
592	22.38	-5.22	42. 16	0.090
593	22.42	-5.30	41. 96	0.089
594	22. 46	-5. 37	41. 76	0. 087
595	22. 49	-5. 45	41. 55	0. 086
596	22. 53	-5. 52	41. 35	0. 084
597 598 599	22. 57 22. 61 22. 65	-5.60 -5.68 -5.75	41. 14 40. 92 40. 71	0.083 0.081
600 601	22.68 22.72	-5.83 -5.91	40. 49 40. 26	0. 080 0. 079 0. 077
602	22. 76	-5. 98	40. 04	0. 076
603	22. 80	-6. 06	39. 81	0. 074
604	22. 83	-6. 14	39. 58	0. 073
605	22. 87	-6.22	39. 35	0. 072
606	22. 91	-6.30	39. 11	0. 070
607	22. 95	-6.38	38.87	0. 069
608	22. 99	-6.45	38.63	0. 068
609	23. 02	-6.53	38.38	0. 067
610	23.06	-6.61	38. 13	0.065
611	23.10	-6.69	37. 88	0.064
612	23. 14	-6. 77	37.62	0. 063
613	23. 18	-6. 85	37.37	0. 062
614	23. 21	-6. 93	37.11	0. 061
615	23. 25	-7.02	36. 84	0. 059
616	23. 29	-7.10	36. 57	0. 058
617	23. 33	-7. 18	36.30	0. 057
618	23. 36	-7. 26	36.03	0. 056
619	23. 40	-7. 34	35.75	0. 055
620	23. 44	-7.43	35. 47	0.054
621	23. 48	-7.51	35. 19	0.053
622	23. 52	-7.59	34. 91	0. 052
623	23. 55	-7.67	34. 62	0. 051
624	23. 59	-7.76	34. 32	0. 050
625	23. 63	-7.84	34.03	0.049
626	23. 67	-7.93	33.73	0.048
627	23. 71	-8.01	33.43	0.047
628 629	23. 74 23. 78	-8. 10 -8. 18	33. 12 32. 82	0. 047 0. 046 0. 045
630	23. 82	-8. 27	32. 50	0. 044
631	23. 86	-8. 35	32. 19	0. 043
632	23. 90	-8. 44	31. 87	0. 042
633	23. 93	-8.52	31. 55	0. 041
634	23. 97	-8.61	31. 23	0. 040
635 636	24.01 24.05	-8. 70 -8. 78	30. 90 30. 57	0.039 0.038 Page 13
				-gc

637 638 639 640 641 642 643 644 645 646 647 648 649 650 651 652 653 654 655 656	$\begin{array}{c} 24.\ 08\\ 24.\ 12\\ 24.\ 16\\ 24.\ 20\\ 24.\ 24\\ 24.\ 27\\ 24.\ 31\\ 24.\ 35\\ 24.\ 39\\ 24.\ 43\\ 24.\ 46\\ 24.\ 50\\ 24.\ 54\\ 24.\ 58\\ 24.\ 61\\ 24.\ 58\\ 24.\ 61\\ 24.\ 65\\ 24.\ 69\\ 24.\ 73\\ 24.\ 77\\ 24.\ 80\\ \end{array}$	-8. 87 -8. 96 -9. 05 -9. 13 -9. 22 -9. 31 -9. 40 -9. 49 -9. 58 -9. 67 -9. 76 -9. 85 -9. 94 -10. 03 -10. 12 -10. 21 -10. 30 -10. 39 -10. 49 -10. 58	30. 23 29. 90 29. 56 29. 21 28. 86 28. 51 28. 16 27. 80 27. 44 27. 08 26. 71 26. 34 25. 96 25. 58 25. 20 24. 82 24. 43 24. 04 23. 64 23. 64 23. 24	report 0. 038 0. 037 0. 036 0. 035 0. 034 0. 033 0. 033 0. 032 0. 031 0. 030 0. 029 0. 028 0. 027 0. 027 0. 027 0. 026 0. 025 0. 025 0. 023	
657 658 659 660 661 662 663 664 665 666 667 668 667 671 672 673 674 675 676 677 678 677 678 679 680 681 682 683	$\begin{array}{c} 24.84\\ 24.88\\ 24.92\\ 24.96\\ 24.99\\ 25.03\\ 25.07\\ 25.11\\ 25.14\\ 25.22\\ 25.26\\ 25.30\\ 25.33\\ 25.37\\ 25.41\\ 25.45\\ 25.52\\ 25.56\\ 25.60\\ 25.60\\ 25.60\\ 25.67\\ 25.75\\ 25.79\\ 25.79\\ 25.83\end{array}$	-10.67 -10.77 -10.86 -10.95 -11.05 -11.11 -11.24 -11.30 -11.36 -11.42 -11.48 -11.67 -11.73 -11.73 -11.98 -12.05 -12.11 -12.24 -12.30 -12.37 -12.43	$\begin{array}{c} 22.\ 84\\ 22.\ 43\\ 22.\ 02\\ 21.\ 61\\ 21.\ 20\\ 20.\ 78\\ 20.\ 35\\ 19.\ 93\\ 19.\ 50\\ 19.\ 07\\ 18.\ 64\\ 18.\ 21\\ 17.\ 77\\ 17.\ 33\\ 16.\ 89\\ 16.\ 45\\ 16.\ 01\\ 15.\ 56\\ 15.\ 11\\ 14.\ 65\\ 14.\ 20\\ 13.\ 74\\ 13.\ 28\\ 12.\ 36\\ 11.\ 89\\ 11.\ 42\\ \end{array}$	$\begin{array}{c} 0.\ 023\\ 0.\ 022\\ 0.\ 022\\ 0.\ 021\\ 0.\ 020\\ 0.\ 020\\ 0.\ 019\\ 0.\ 019\\ 0.\ 019\\ 0.\ 019\\ 0.\ 019\\ 0.\ 019\\ 0.\ 017\\ 0.\ 017\\ 0.\ 017\\ 0.\ 017\\ 0.\ 017\\ 0.\ 016\\ 0.\ 016\\ 0.\ 016\\ 0.\ 015\\ 0.\ 015\\ 0.\ 015\\ 0.\ 015\\ 0.\ 015\\ 0.\ 015\\ 0.\ 015\\ 0.\ 015\\ 0.\ 015\\ 0.\ 016\\ 0.\ 016\\ 0.\ 016\\ 0.\ 016\\ 0.\ 016\\ 0.\ 011\\ 0.\ 011\\ 0.\ 010\\ 0.\ 009\\ 0.\ 000\\ 0.\ 0.\ 000\\ 0.\ 0.\ 000\\ 0.\ 0.\ 0.\ 000\\ 0.\ 0.\ 0.\ 000\\ 0.\ 0.\ 000\\ 0.\ 0.\ 0.\ 0.\ 0.\ 0.\ 0.\ 0.\ 0.\ 0.\$	
683 685 685 687 688 689 690 691 692 693 694 695 694 695 696 697 698 699	25.86 25.90 25.94 25.98 26.02 26.05 26.09 26.13 26.17 26.20 26.24 26.28 26.32 26.39 26.43	-12. 43 -12. 50 -12. 56 -12. 63 -12. 69 -12. 76 -12. 82 -12. 89 -12. 96 -13. 02 -13. 09 -13. 15 -13. 22 -13. 29 -13. 36 -13. 42 -13. 49	10. 95 10. 47 10. 00 9. 52 9. 03 8. 55 8. 06 7. 57 7. 08 6. 59 6. 09 5. 59 5. 09 4. 59 4. 08 3. 57	0.009 0.008 0.008 0.007 0.007 0.006 0.006 0.006 0.005 0.005 0.005 0.005 0.005 0.004 0.004 0.004 0.004 0.004 0.004 0.003 0.003 0.003 0.002 Page 14	

700 701 702 703 704 705 706 707 708 709 710 711 712 713 714 716 717 718 710 721 722 723 724 725 727 728 729 730 731 732 733 734 735 737 738 739 741 742 743 744 745 746 747 748 749 751 753 754 755 757 758	$\begin{array}{c} 26.\ 47\\ 26.\ 55\\ 26.\ 58\\ 26.\ 62\\ 26.\ 66\\ 26.\ 74\\ 26.\ 77\\ 26.\ 85\\ 26.\ 62\\ 26.\ 92\\ 26.\ 96\\ 27.\ 04\\ 27.\ 11\\ 27.\ 12\\ 77.\ 12\\ 77.\ 12\\ 77.\ 12\\ 77.\ 33\\ 27.\ 45\\ 27.\ 57\\ 27.\ 61\\ 27.\ 63\\ 27.\ 76\\ 27.\ 83\\ 27.\ 76\\ 27.\ 80\\ 27.\ 76\\ 27.\ 80\\ 27.\ 76\\ 27.\ 80\\ 27.\ 76\\ 27.\ 80\\ 27.\ 76\\ 27.\ 80\\ 27.\ 95\\ 28.\ 06\\ 28.\ 14\\ 28.\ 25\\ 28.\ 36\\ 28.\ 44\\ 28.\ 48\\ 28.\ 55\\ 28.\ 67\\ 28.\ 67\\ 28.\ 56\\ 28.\ 67\\ 28.\ $	$\begin{array}{c} -13.56\\ -13.63\\ -13.69\\ -13.76\\ -13.83\\ -13.90\\ -13.75\\ -13.60\\ -13.45\\ -13.10\\ -13.45\\ -13.10\\ -12.71\\ -12.56\\ -12.41\\ -12.56\\ -12.41\\ -12.56\\ -12.41\\ -12.56\\ -12.41\\ -12.56\\ -12.41\\ -12.56\\ -12.41\\ -12.56\\ -12.41\\ -12.56\\ -12.41\\ -12.56\\ -12.41\\ -12.56\\ -12.41\\ -12.56\\ -12.41\\ -12.56\\ -12.41\\ -12.56\\ -12.41\\ -12.56\\ -12.41\\ -12.56\\$	3.06 2.54 2.02 1.50 0.98 0.46 -0.52 -1.259 -1.259 -1.259 -2.577 -2.577 -2.577 -2.577 -2.577 -2.577 -3.351 -3.351 -4.359 -4.359 -4.359 -5.579 -5.579 -5.596 -5.579 -5.596 -5.607 -6.114 -6.1153 -6.6176 -6.116 -6.	$\begin{array}{c} \text{report}\\ 0.\ 002\\ 0.\ 001\\ 0.\ 000\\ 0.\ 000\\ 0.\ 000\\ 0.\ 000\\ 0.\ 000\\ 0.\ 000\\ 0.\ 000\\ 0.\ 000\\ -0.\ 001\\ -0.\ 002\\ -0.\ 002\\ -0.\ 002\\ -0.\ 002\\ -0.\ 002\\ -0.\ 003\\ -0.\ 003\\ -0.\ 003\\ -0.\ 004\\ -0.\ 004\\ -0.\ 004\\ -0.\ 004\\ -0.\ 004\\ -0.\ 004\\ -0.\ 004\\ -0.\ 005\\ -0.\ 005\\ -0.\ 005\\ -0.\ 005\\ -0.\ 005\\ -0.\ 005\\ -0.\ 005\\ -0.\ 005\\ -0.\ 005\\ -0.\ 005\\ -0.\ 005\\ -0.\ 005\\ -0.\ 005\\ -0.\ 005\\ -0.\ 005\\ -0.\ 006\\ -0.\ 007\\ -0.\ 007\\ -0.\ 007\\ -0.\ 007\\ -0.\ 007\\ -0.\ 007\\ -0.\ 007\\ -0.\ 007\\ -0.\ 007\\ -0.\ 007\\ -0.\ 007\\ -0.\ 007\\ -0.\ 007\\ -0.\ 007\\ -0.\ 007\\ -0.\ 007\\ -0.\ 010\\ -0.\ 010\\ -0.\ 010\\ -0.\ 011\\ -0.\ 012\\ -0.\ 012\\ -0.\ 013\\ -0.\ 013\\ -0.\ 013\\ -0.\ 014\\ -0.\ 015\\ -0.\ 016\\ -0.\ 016\\ -0.\ 016\\ -0.\ 016\\ -0.\ 016\\ -0.\ 016\\ -0.\ 016\\ -0.\ 017\\ -0.\ 018\\ -0.\ 019\\ -0.\ 020\\ -0.\ 020\\ -0.\ 021\\ -0.\ 022$	
754	28. 51	-6.62	-6. 16	-0. 021	
755	28. 55	-6.47	-6. 15	-0. 021	
756	28. 59	-6.32	-6. 13	-0. 022	

763 764 765 766 767 768 769 770 771 772 773 774 775 776 777 778 775 776 777 778 779 780 781 782 783 784 785 786 787 788 789 790 791 792 793 794 795 796 797	$\begin{array}{c} 28. \ 86\\ 28. \ 89\\ 28. \ 93\\ 28. \ 97\\ 29. \ 01\\ 29. \ 05\\ 29. \ 08\\ 29. \ 12\\ 29. \ 16\\ 29. \ 20\\ 29. \ 23\\ 29. \ 27\\ 29. \ 31\\ 29. \ 35\\ 29. \ 39\\ 29. \ 46\\ 29. \ 50\\ 29. \ 54\\ 29. \ 58\\ 29. \ 61\\ 29. \ 58\\ 29. \ 61\\ 29. \ 58\\ 29. \ 61\\ 29. \ 58\\ 29. \ 61\\ 29. \ 58\\ 29. \ 61\\ 29. \ 58\\ 29. \ 61\\ 29. \ 58\\ 29. \ 61\\ 29. \ 58\\ 29. \ 61\\ 29. \ 58\\ 29. \ 61\\ 29. \ 58\\ 29. \ 61\\ 29. \ 58\\ 29. \ 61\\ 29. \ 65\\ 29. \ 69\\ 29. \ 73\\ 29. \ 76\\ 29. \ 88\\ 29. \ 92\\ 29. \ 95\\ 29. \ 99\\ 30. \ 03\\ 30. \ 07\\ 30. \ 11\\ 30. \ 14\\ \end{array}$	$\begin{array}{c} -5.\ 28\\ -5.\ 13\\ -4.\ 98\\ -4.\ 84\\ -4.\ 69\\ -4.\ 54\\ -4.\ 39\\ -4.\ 24\\ -4.\ 09\\ -3.\ 94\\ -3.\ 79\\ -3.\ 65\\ -3.\ 35\\ -3.\ 20\\ -3.\ 35\\ -3.\ 20\\ -2.\ 75\\ -2.\ 61\\ -2.\ 61\\ -2.\ 61\\ -2.\ 16\\ -2.\ 16\\ -2.\ 1.\ 71\\ -1.\ 57\\ -1.\ 42\\ -1.\ 27\\ -0.\ 82\\ -0.\ 53\\ -0.\ 38\\ -0.\ 23\\ \end{array}$	$\begin{array}{c} -5.82\\ -5.75\\ -5.68\\ -5.52\\ -5.33\\ -5.23\\ -5.23\\ -5.13\\ -5.01\\ -4.77\\ -4.64\\ -4.57\\ -4.51\\ -4.22\\ -4.07\\ -3.75\\ -3.75\\ -3.58\\ -3.41\\ -3.22\\ -2.66\\ -2.45\\ -2.20\\ -1.59\\ -1.59\\ -1.59\\ -1.59\\ -1.59\\ -0.88\\ -0.38\\ -0.38\end{array}$	$\begin{array}{c} \text{report}\\ -0.\ 025\\ -0.\ 026\\ -0.\ 027\\ -0.\ 027\\ -0.\ 028\\ -0.\ 028\\ -0.\ 029\\ -0.\ 029\\ -0.\ 030\\ -0.\ 030\\ -0.\ 030\\ -0.\ 031\\ -0.\ 031\\ -0.\ 032\\ -0.\ 032\\ -0.\ 033\\ -0.\ 033\\ -0.\ 033\\ -0.\ 033\\ -0.\ 033\\ -0.\ 035\\ -0.\ 035\\ -0.\ 035\\ -0.\ 035\\ -0.\ 036\\ -0.\ 037\\ -0.\ 036\\ -0.\ 037\\ -0.\ 038\\ -0.\ 037\\ -0.\ 038\\ -0.\ 039\\ -0.\ 040\\ -0.\ 041\\ -0.\ 041\\ -0.\ 041\\ -0.\ 042\\ -0.\ 043\\ \end{array}$

The above data can be selected using mouse, then copy and paste into Excel to create graphics







Sheet Pile Section Properties										
Nominal Width (in)		rea 1 ²)		eight os)		of Inertia n ⁴)		Modulus ³)		e Area / ft)
	Single Section	Per Linear Foot of Wall	Per Foot of Sheet	Per Square Foot	Single Section	Per Linear Foot of Wa ll	Single Section	Per Linear Foot of Wall	Total Area	Nominal Coating Area *
25.00	14.82	7.12	50.4	24.2	532.2	255.5	69.8	33.5	6.10	5.60

* Excludes socket interior & ball of interlock.

Available Material Grades: ASTM A572 Grade 50 and 60, Also A588 and A690.



1710011	/E PRESSURES: No.	Z1	P1	Z2	P2	Slope	
	1	12.00	0.00	28.00	5.06	0.3160	
	2	28.00	3.87	32.01	174.90	0.2215	
UNITS:	Width/Spacing	/Diameter/Ler	ngth/Depth - t	ft, Force - kip,	Moment - kip	-ft,	
UNITS:	Friction/Bearing	g/Pressure - ks	f, Pres. Slop	e - kip/ft3, De	flection - in		



report SHORING WALL CALCULATION SUMMARY The leading shoring design and calculation software Software Copyright by CivilTech Software www.civiltechsoftware.com ShoringSuite Software is developed by CivilTech Software, Bellevue, WA, USA. The calculation method is based on the following references:
1. FHWA 98-011, FHWA-RD-97-130, FHWA SA 96-069, FHWA-IF-99-015
2. STEEL SHEET PILING DESIGN MANUAL by Pile Buck Inc., 1987
3. DESIGN MANUAL DM-7 (NAVFAC), Department of the Navy, May 1982
4. TRENCHING AND SHORING MANUAL Revision 12, California Department of Transportation, January 2000
 EARTH SUPPORT SYSTEM & RETAINING STRUCTURES, Pile Buck Inc. 2002
 DESIGN OF SHEET PILE WALLS, EM 1110-2-2504, U.S. Army Corps of Engineers, 31 March 1994 7. EARTH RETENTION SYSTEMS HANDBOOK, Alan Macnab, McGraw-Hill. 2002 8. AASHTO HB-17, American Association of State and Highway Transportation Officials, 2 September 2002 UNITS: Width/Spacing/Diameter/Length/Depth - ft, Force - kip, Moment - kip-ft, Friction/Bearing/Pressure - ksf, Pres. Slope - kip/ft3, Deflection - in -----4324324234 Li censed to 3424343 Date: 8/10/2017 File: C: \Users\kgal vez\Documents\Blaine Bulkhead\170720 Blaine Sheetpile - 12' Wall.sh8 Title: BLAINE HARBOR Subtitle: Sheet Pile Bulkhead Wall Type: 1. Sheet Pile Wall Height: 12.00 Pile Diameter: 1.00 Pile Spacing: 1.00 Free Spacing: 1.00
 Factor of Safety (F.S.): 1.50
 Max. Moment reduce 20%
 Lateral Support Type (Braces): 1. No
 Top Brace Increase (Multi-Bracing): Add 15%*
 Embedment Option: 1. Yes Friction at Pile Tip: No* Pile Properties: Allowable Fb/Fy: 0.66 Steel Strength, Fy: 50 ksi = 345 MPa Elastic Module, E: 29000.00 Moment of Inertia, I: 84.40 User Input Pile: PZ22 * DRIVING PRESSURE (ACTIVE, WATER, & SURCHARGE) * No. Z2 top Top Pres. Z2 bottom Bottom Pres. SI ope 7.00 1 0.00 0.00 0. 31 0.0443 7.00 0. 31 0. 25 0.41 2 3 12.00 0.0210 12.00 28.00 0.51 0.0160 4 5 28.00 0.60 800.00 14.53 0.0180 7.00 0.00 12.00 0.31 0.0626 6 12.00 0.31 0.31 800.00 0.0000 0.00 7 0. 11 12.00 0. 11 0.0000 12.00 8 0.00 0.08 0.02 -0.0050

report * PASSIVE PRESSURE * Top Pres. Z2 bottom No. Z1 top Bottom Pres. SI ope • _ _ _ _ _ _ _ _ _ 5.06 0.00 28.00 3.87 800.00 0.3160 12.00 1 28.00 174.90 2 0.2215 _____ The pressure above will be divided by a Factor of Safety =1.5 * ACTIVE SPACE * No. Z depth Spaci ng -----0.00 1.00 1 2 12.00 1.00 _____ * PASSIVE SPACE * Spacing No. Z depth -----1.00 1 12.00 *For Tieback: Input1 = Diameter; Input2 = Bond Stength
*For Plate: Input1 = Diameter; Input2 = Allowable Pressure
*For Deaman: Input1 = Horz. Width; Input2 = Allowable Pressure; Angle = 0 The calculated moment and shear are per pile spacing. Sheet piles are per one feet or meter; Soldier piles are per pile. Top Pressures start at depth = 0.00D1=0.00 D2=12.00 == | == D3=36.02 D1 - TOP DEPTH D2 - EXCAVATION BASE D3 - PILE TIP (20% increased, see EMBEDMENT Notes below) MOMENT BALANCE: M=0.00 AT DEPTH=32.01 WITH EMBEDMENT OF 20.01 FORCE BALANCE: F=0.00 AT DEPTH=36.02 WITH EMBEDMENT OF 24.02 The program calculates embedment for moment equilibrium, then increased by 20% to reach force equilibrium. Total Passive Pressure = Total Active Pressure, OK! * EMBEDMENT Notes * Based on USS Design Manual, fist calculate embedment for moment equilibrium, then increased by 20 to 40 % to reach force equilibrium. The embedment for moment equilibrium is 20.01 The 20% increased embedment for force equilibrium is 24.02 (Used by Program) The 30% increased embedment for force equilibrium is 26.02 The 40% increased embedment for force equilibrium is 28.02

report Based on AASHTO Standard Specifications, fist calculate embedment for moment equilibrium, then add safety factor of 30% for temporary shoring; add safety factor of 50% for permanent shoring. The embedment for moment equilibrium is 20.01 Add 30% embedment for temporary shoring (FS=1.3) is 26.02 Add 50% embedment for permanent shoring (FS=1.5) is 30.02 PROGRAM RECOMMENDED MINIMUM EMBEDMENT = 24.02 TOTAL MINIMUM PILE LENGTH = 36.02 * MOMENT IN PILE (per pile spacing)* Overall Maximum Moment = 79.00 at 23.04 Maximum Shear = 17.84Moment and Shear are per pile spacing: 1.0 feet or meter * VERTICAL LOADING * Vertical Loading from Braces = 0.00 Vertical Loading from External Load = 0.00 Total Vertical Loading = 0.00 Request Min. Section Modulus = 28.7 in3/feet, Fy= 50 ksi = 345 MPa, Fb/Fy=0.66 The pile selection is based on the magnitude of the moment only. Axial force is negl ected. Sx(in3) and lx(in4) are per one foot of horizontal width of the pile * Note: The sheet pile properties are in English Units and based on one foot width (even in Metric unit). Top Deflection= 3.48 SZ24 Sx= 29 I x= 177.9 Weight= 44.1 SZ24A Sx= 29.5 ₩eight= 42.6 l x= 186.5 Top Deflection= 3.32 SZ25 Sx= 29.7 l x= 182 Weight = 45.3 Top Deflection= 3.41 Sx= 29.76 CZ114RD I x= 199.24 Weight= 43.8 Top Deflection= 3.11 3N(M)Sx= 30.2 I x= 168.1 Weight= 44.55 Top Deflection= 3.69 Sx= 30.2 Weight= 40.5PZ27 I x= 184.2 Top Deflection= 3.37 Top Deflection= 3.04 PLZ23 Sx= 30.2 I x= 203.8 Weight= 45.2 Weight= 43.27 Weight= 47.71 Weight= 45.16 Top Deflection= 3.44 Top Deflection= 3.60 Top Deflection= 3.42 Sx= 30.5 | x= 180 | x= 172.1 BZ16.4 Sx= 30.5 Sx= 30.7 Sx= 31 RZ10 I x= 181.3 134N PZ27 I x= 187.5 Weight = 40.5 Top Deflection= 3.31 Weight= 43.96 Sx= 31.1 BZ17 I x= 183.7 Top Deflection= 3.37 SPZ23 Sx= 31.3 I x= 208.7 Weight= 46.22 Top Deflection= 2.97 Sx= 31.4 I x= 188.1 Weight = 42.07 Top Deflection= 3.30 3NA *******SHEAR, MOMENT, AND DEFLECTION v.s. DEPTH*********** The shear and moment are per single soldier pile (secant/tangent pile) or one foot of sheet pile (concrete wall). The deflection is based on users input pile below: User Input Pile: PZ22 Elastic Module, E: 29000.00 Moment of Inertia, I: 84.40 DEPTH SHEAR MOMENT No DEFLECTI ON ft kip-ft ki p in 1 0.00 0.00 0.00 7.345 7.330 2 0.05 0.01 0.00 3 0.09 0.02 0.00 7.314 7.298 4 0.14 0.03 0.00 5 0.18 0.04 0.00 7.283 6 0.23 0.04 0.00 7.267 Page 3

$\begin{array}{c} 0.\ 272\\ 0.\ 345\\ 0.\ 0.\ 0.\ 0.\ 0.\ 0.\ 0.\ 0.\ 0.\ 0.\$
$\begin{array}{c} 0.\ 05\\ 0.\ 07\\ 0.\ 08\\ 0.\ 07\\ 0.\ 08\\ 0.\ 07\\ 0.\ 11\\ 0.\ 12\\ 0.\ 13\\ 0.\ 14\\ 0.\ 15\\ 0.\ 16\\ 0.\ 17\\ 0.\ 18\\ 0.\ 20\\ 0.\ 21\\ 0.\ 22\\ 0.\ 23\\ 0.\ 24\\ 0.\ 25\\ 0.\ 27\\ 0.\ 28\\ 0.\ 31\\ 0.\ 32\\ 0.\ 34\\ 0.\ 35\\ 0.\ 34\\ 0.\ 42\\ 0.\ 43\\ 0.\ 45\\ 0.\ 47\\ 0.\ 48\\ 0.\ 55\\$
$ \begin{array}{c} 0. \ 01 \\ 0. \ 01 \\ 0. \ 02 \\ 0. \ 02 \\ 0. \ 02 \\ 0. \ 03 \\ 0. \ 04 \\ 0. \ 05 \\ 0. \ 05 \\ 0. \ 05 \\ 0. \ 07 \\ 0. \ 08 \\ 0. \ 08 $
report 7. 252 7. 236 7. 220 7. 205 7. 189 7. 173 7. 158 7. 142 7. 126 7. 111 7. 095 7. 079 7. 064 7. 048 7. 033 7. 017 7. 001 6. 986 6. 970 6. 954 6. 939 6. 923 6. 907 6. 892 6. 876 6. 845 6. 845 6. 845 6. 845 6. 845 6. 845 6. 845 6. 845 6. 845 6. 829 6. 782 6. 767 6. 751 6. 751 6. 751 6. 735 6. 720 6. 704 6. 688 6. 673 6. 657 6. 642 6. 626 6. 610 6. 595 6. 579 6. 563 6. 579 6. 376 6. 360 6. 376 6. 360 6. 376 6. 360 6. 376 6. 329 6. 313

70 71 72 73 74 75 76 77 78 98 81 82 83 84 85 87 88 90 92 94 95 97 98 99 100 102 103 104 106 107 109 111 112 113 114 115 116 117 122 123 124 122	3.3.3.3.3.3.3.3.3.3.3.3.3.3.3.3.3.4.4.4.4.4.4.4.4.4.4.4.4.4.4.4.4.5	$\begin{array}{c} 0.\ 79\\ 0.\ 82\\ 0.\ 83\\ 0.\ 84\\ 0.\ 87\\ 0.\ 99\\ 0.\ 92\\ 0.\ 93\\ 0.\ 94\\ 0.\ 99\\ 0.\ 93\\ 0.\ 96\\ 0.\ 99\\ 0.\ 96\\ 0.\ 99\\ 0.\ 96\\ 0.\ 99\\ 0.\ 96\\$	$\begin{array}{c} 1.111111111111111111111122222222222222$	report 6. 266 6. 251 6. 235 6. 219 6. 204 6. 188 6. 173 6. 157 6. 141 6. 126 6. 100 6. 094 6. 079 6. 063 6. 048 6. 032 6. 016 6. 001 5. 985 5. 969 5. 954 5. 923 5. 907 5. 891 5. 860 5. 845 5. 829 5. 813 5. 782 5. 767 5. 751 5. 782 5. 767 5. 751 5. 720 5. 744 5. 689 5. 548 5. 595 5. 564 5. 548 5. 595 5. 564 5. 548 5. 595 5. 564 5. 548 5. 595 5. 564 5. 548 5. 533 5. 717 5. 502 5. 486 5. 439 5. 424 5. 402
120	5.37	1. 60	3.78	5. 486
121	5.41	1. 61	3.85	5. 471
122	5.46	1. 63	3.92	5. 455
123	5.50	1. 65	4.00	5. 439
124	5.55	1. 67	4.07	5. 424

$\begin{array}{c} 196\\ 197\\ 198\\ 200\\ 202\\ 203\\ 204\\ 205\\ 206\\ 207\\ 208\\ 206\\ 207\\ 208\\ 200\\ 211\\ 212\\ 213\\ 214\\ 215\\ 216\\ 217\\ 218\\ 220\\ 222\\ 223\\ 225\\ 226\\ 227\\ 228\\ 233\\ 235\\ 236\\ 237\\ 238\\ 240\\ 241\\ 242\\ 243\\ 244\\ 245\\ 247\\ 248\\ 246\\ 247\\ 248\\ 246\\ 247\\ 248\\ 246\\ 247\\ 248\\ 246\\ 247\\ 248\\ 246\\ 247\\ 248\\ 246\\ 247\\ 248\\ 246\\ 255\\ 255\\ 256\\ \end{array}$	$\begin{array}{c} 8.\ 79\\ 8.\ 84\\ 8.\ 93\\ 9.\ 02\\ 9.\ 06\\ 1.\ 15\\ 9.\ 24\\ 9.\ 29\\ 9.\ 23\\ 9.\ 24\\ 9.\ 29\\ 9.\ 24\\ 9.\ 24\\ 9.\ 26\\ 1.\ 56\\ 10.\ 10\\ 10.\ 10\\ 10.\ 10\\ 10.\ 24\\ 10.\ 28\\ 10.\ 37\\ 10.\ 46\\ 10.\ 55\\ 10.\ 64\\ 10.\ 55\\ 10.\ 64\\ 10.\ 78\\ 10.\ 87\\ 10.\ 96\\ 11.\ 05\\ 11.\ 05\\ 11.\ 05\\ 11.\ 05\\ 11.\ 05\\ 11.\ 11.\ 23\\ 11.\ 36\\ 11.\ 35\\ 11.\ 3$	$\begin{array}{c} 3.33333333333333333333333333333333333$	$\begin{array}{c} 11. \ 91\\ 12. \ 06\\ 12. \ 21\\ 12. \ 36\\ 12. \ 51\\ 12. \ 67\\ 12. \ 82\\ 13. \ 13. \ 29\\ 13. \ 45\\ 13. \ 29\\ 13. \ 45\\ 13. \ 74\\ 14. \ 27\\ 14. \ 41\\ 14. \ 78\\ 15. \ 29\\ 15. \ 65\\ 16. \ 74\\ 16. \ 55\\ 16. \ 74\\ 16. \ 55\\ 16. \ 74\\ 16. \ 57\\ 17. \ 50\\ 17. \ 31\\ 17. \ 50\\ 17. \ 88\\ 18. \ 88\\ 18. \ 88\\ 19. \ 29\\ 19. \ 70\\ 19. \ 91\\ 20. \ 34\\ 20. \ 57\\ 20. \ 98\\ 21. \ 45\\ 22. \ 58\\ 22. \ 78\\ 22. \ 57\\ 20. \ 98\\ 21. \ 45\\ 22. \ 57\\ 22. \ 57\\ 22. \ 57\\ 23. \ 25\\ 23. \ 25\\ 23. \ 25\\ 25. \ 78\\ 23. \ 25\\ 25. \ 78\\ 25.$	report 4. 313 4. 298 4. 283 4. 267 4. 252 4. 222 4. 226 4. 191 4. 176 4. 176 4. 146 4. 131 4. 146 4. 131 4. 085 4. 070 4. 025 4. 040 4. 025 4. 040 4. 025 4. 040 4. 025 4. 040 4. 025 4. 040 4. 025 4. 040 5. 994 3. 979 3. 964 3. 979 3. 964 3. 979 3. 964 3. 979 3. 964 3. 8874 3. 8874 3. 754 3. 754 3. 754 3. 665 3. 665 3. 665 3. 665 3. 561 3. 561 3. 561 3. 542 3. 443 3. 444 3.
254	11. 41	5. 13	22. 78	3. 443
255	11. 45	5. 17	23. 01	3. 428

259 260 261 262 263 264 265 266 267 268 269 270 271 273 274 275 277 278 279 280 281 282 283 284 285 286 287 289 290 291 292 293 294 295 297 298 299 300 302 303 304 305 306 307 308 309 310 311 312 313 314 315	$\begin{array}{c} 11.\ 63\\ 11.\ 72\\ 11.\ 77\\ 11.\ 82\\ 11.\ 77\\ 11.\ 82\\ 11.\ 77\\ 11.\ 82\\ 12.\ 04\\ 12.\ 09\\ 12.\ 12.\ 22.\ 12.\ 12.\ 12.\ 12.\ 12.\$	5.55555555555555555555555555555566666666	$\begin{array}{c} 23.\ 96\\ 24.\ 20\\ 24.\ 44\\ 24.\ 69\\ 24.\ 93\\ 25.\ 43\\ 25.\ 43\\ 25.\ 43\\ 25.\ 43\\ 25.\ 68\\ 25.\ 93\\ 26.\ 91\\ 27.\ 72\\ 7.\ 72\ 72\ 72\ 72\ 72\ 72\ 72\ 72\ 72\ 72$	report 3.370 3.355 3.341 3.326 3.370 3.355 3.341 3.326 3.311 3.297 3.282 3.268 3.253 3.224 3.210 3.195 3.167 3.152 3.181 3.167 3.152 3.181 3.109 3.095 3.066 3.023 3.023 3.095 2.980 2.995 2.982 2.92
311	13. 98	6.37	37.95	2. 631
312	14. 02	6.38	38.24	2. 618
313	14. 07	6.38	38.53	2. 604
314	14. 11	6.39	38.82	2. 590

322 323 324 325 3224 325 3227 3290 3312 333 333 333 3345 337 3390 332 3341 3342 3445 347 3490 3512 35545 3557 3590 3612 3645 3667 36890 3712 3745 377890 3812 3778 3778 37890 3772 37745 377890 38123 3823 38233 382335 38235 38235 38235 38235 38235 38235 38235 38235 38235 38235 38235 38235 38235 38235 38255 38255 38255 382555 3825555 3825555555555	$\begin{array}{c} 14.\ 527\\ 14.\ 577\\ 14.\ 14.\ 14.\ 15.\ 5.\ 5.\ 5.\ 5.\ 5.\ 5.\ 5.\ 5.\ 5.\ $	$ \begin{array}{c} 6.6.6.6.6.6.6.6.6.6.6.6.6.6.6.6.6.6.6.$	$\begin{array}{c} 41.\ 13\\ 41.\ 42\\ 42.\ 58\\ 42.\ 58\\ 43.\ 45\\ 43.\ 45\\ 44.\ 44.\ 44.\ 44.\ 45.\ 65\\ 45.\ 65\\ 46.\ 65\\ 46.\ 65\\ 46.\ 65\\ 46.\ 65\\ 46.\ 65\\ 55\\ 55\\ 55\\ 55\\ 55\\ 55\\ 55\\ 55\\ 55\\$	report 2.482 2.468 2.455 2.442 2.468 2.455 2.442 2.468 2.455 2.442 2.428 2.415 2.401 2.388 2.375 2.362 2.332 2.292 2.179 2.205 2.200 2.272 2.200 2.272 2.200 2.272 2.200 2.272 2.100 2.127 2.115 2.102 2.002 2.014 2.001 2.127 2.115 2.102 2.002 2.014 2.001 1.989 1.976 1.964 1.951 1.964 1.965 1.978 1.866 1.841 1.820 1.878 1.866 1.841 1.820 1.878 1.866 1.841 1.820 1.878 1.866 1.851 1.769 1.758 1.769 1.758 1.769 1.758 1.746 1.758 1.746 1.758 1.746 1.758 1.746 1.758 1.746 1.722 1.720 1.750 1.746 1.750 1.746 1.74
381	17.14	5.97	57.94	1.734

385	17. 32	5.89	59. 01	report 1.687
386	17. 36	5.87	59.28	1. 675
387	17. 41	5.85	59.54	1. 664
388	17. 45	5.83	59.80	1. 652
389	17. 50	5. 81	60. 07	1. 641
390	17. 54	5. 78	60. 33	1. 629
391	17. 59	5. 76	60. 59	1. 618
392	17. 63	5. 74	60.85	1. 606
393	17. 68	5. 71	61.10	1. 595
394	17. 72	5. 69	61.36	1. 584
395	17. 77	5. 66	61. 62	1. 572
396	17. 81	5. 64	61. 87	1. 561
397	17. 86	5. 61	62. 13	1. 550
398 399	17. 90 17. 95	5.59 5.56	62. 38 62. 63 62. 88	1. 538 1. 527
400 401 402	17. 99 18. 04 18. 08	5.53 5.50 5.48	63.13 63.38	1.516 1.505 1.494
403	18. 13	5.45	63. 62	1. 483
404	18. 17	5.42	63. 87	1. 472
405	18. 22	5.39	64. 11	1. 461
406	18. 26	5.36	64.35	1. 450
407	18. 31	5.33	64.60	1. 439
408	18. 35	5.30	64.83	1. 428
409	18. 40	5. 27	65.07	1. 417
410	18. 44	5. 24	65.31	1. 407
411	18. 49	5. 21	65.55	1. 396
412	18. 53	5. 18	65. 78	1. 385
413	18. 58	5. 15	66. 01	1. 374
414	18. 62	5. 12	66. 24	1. 364
415	18. 67	5.08	66. 47	1. 353
416	18. 71	5.05	66. 70	1. 343
417	18. 76	5.02	66. 93	1. 332
418	18. 80	4. 98	67.16	1. 322
419	18. 85	4. 95	67.38	1. 311
420	18. 90	4. 91	67.60	1. 301
421	18. 94	4.88	67.82	1. 290
422	18. 99	4.84	68.04	1. 280
423	19. 03	4.81	68.26	1. 270
424	19.08	4. 77	68. 48	1. 259
425	19.12	4. 73	68. 69	1. 249
426	19.17	4. 70	68. 90	1. 239
427	19. 21	4. 66	69. 11	1. 229
428	19. 26	4. 62	69. 32	1. 219
429	19. 30	4. 58	69. 53	1. 209
430	19.35	4.54	69. 74	1. 199
431	19.39	4.50	69. 94	1. 189
432	19.44	4.47	70. 14	1. 179
433	19. 48	4.43	70. 34	1. 169
434	19. 53	4.39	70. 54	1. 159
435	19. 57	4.34	70. 74	1. 149
435 436 437 438	19. 62 19. 66 19. 71	4.30 4.26 4.22	70. 93 71. 13 71. 32	1. 140 1. 130 1. 120
430 439 440 441	19. 75 19. 80	4.18 4.14	71. 51 71. 69	1. 110 1. 101
442 443	19.84 19.89 19.93	4.09 4.05 4.01	71.88 72.06 72.24	1.091 1.082 1.072
444	19.98	3. 96	72. 42	1.063
445	20.02	3. 92	72. 60	1.053
446	20.07	3. 87	72. 78	1.044
447	20. 11	3.83	72.95	1.035 Page 10

$\begin{array}{c} 448\\ 449\\ 450\\ 451\\ 452\\ 453\\ 455\\ 456\\ 457\\ 458\\ 459\\ 460\\ 461\\ 263\\ 465\\ 465\\ 466\\ 467\\ 468\\ 465\\ 466\\ 467\\ 471\\ 472\\ 473\\ 476\\ 477\\ 478\\ 480\\ 481\\ 482\\ 483\\ 486\\ 487\\ 489\\ 490\\ 491\\ 492\\ 493\\ 495\\ 496\\ 497\\ 498\\ 900\\ 500\\ 500\\ 500\\ 500\\ 500\\ 500\\ 500$	$\begin{array}{c} 20.\ 16\\ 20.\ 20\\ 20.\ 25\\ 20.\ 29\\ 20.\ 34\\ 20.\ 43\\ 20.\ 43\\ 20.\ 47\\ 20.\ 52\\ 20.\ 56\\ 20.\ 74\\ 20.\ 52\\ 20.\ 74\\ 20.\ 79\\ 20.\ 88\\ 20.\ 97\\ 21.\ 65\\ 20.\ 74\\ 20.\ 79\\ 20.\ 88\\ 20.\ 97\\ 21.\ 10\\ 21.\ 15\\ 21.\ 47\\ 21.\ 51\\ 21.\ 56\\ 21.\ 69\\ 21.\ 78\\ 21.\ 83\\ 21.\ 47\\ 21.\ 56\\ 21.\ 69\\ 21.\ 78\\ 21.\ 83\\ 21.\ 92\\ 22.\ 10\ 10\\ 22.\ 10\ 10\\ 22.\ 10\ 10\ 10\ 10\ 10\ 10\ 10\ 10\ 10\ 10$	$\begin{array}{c} 3. \\ 78 \\ 3. \\ 3. \\ 3. \\ 3. \\ 3. \\ 3. \\ 3. \\ 3$	$\begin{array}{c} 73. \ 12\\ 73. \ 29\\ 73. \ 46\\ 73. \ 62\\ 73. \ 95\\ 74. \ 12\\ 74. \ 57\\ 74. \ 75\\ 75. \ 16\\ 75. \ 30\\ 75. \ 75\\ 75. \ 75\\ 75. \ 84\\ 75. \ 97$	report 1.025 1.016 1.007 0.998 0.989 0.989 0.989 0.989 0.989 0.980 0.971 0.962 0.953 0.944 0.935 0.926 0.917 0.909 0.900 0.8813 0.874 0.866 0.870 0.791 0.783 0.775 0.767 0.759 0.7751 0.775 0.767 0.755 0.767 0.755 0.767 0.755 0.767 0.755 0.767 0.755 0.767 0.682 0.667 0.663 0.663 0.663 0.663 0.663 0.663 0.653 0.665 0.665 0.665 0.665 0.665 0.665 0.658 0.658 0.658 0.658 0.556 0.558 0.556 0.
502	22. 59	0. 72	78. 84	0. 589
503	22. 64	0. 65	78. 87	0. 582
504	22. 68	0. 58	78. 89	0. 575

511 512 513 514 515 516 517 518 520 521 522 523 524 525 524 525 527 528 527 528 529 530 531	23. 00 23. 04 23. 09 23. 13 23. 18 23. 22 23. 27 23. 31 23. 36 23. 40 23. 45 23. 49 23. 54 23. 59 23. 63 23. 63 23. 68 23. 77 23. 81 23. 86 23. 90	$\begin{array}{c} 0. \ 10 \\ 0. \ 03 \\ -0. \ 05 \\ -0. \ 12 \\ -0. \ 19 \\ -0. \ 26 \\ -0. \ 34 \\ -0. \ 41 \\ -0. \ 48 \\ -0. \ 56 \\ -0. \ 63 \\ -0. \ 71 \\ -0. \ 78 \\ -0. \ 86 \\ -0. \ 94 \\ -1. \ 01 \\ -1. \ 09 \\ -1. \ 17 \\ -1. \ 24 \\ -1. \ 32 \\ -1. \ 40 \end{array}$	79.00 79.00 79.00 78.99 78.98 78.95 78.95 78.93 7	report 0. 529 0. 522 0. 516 0. 509 0. 503 0. 497 0. 491 0. 484 0. 478 0. 472 0. 466 0. 460 0. 454 0. 448 0. 442 0. 437 0. 431 0. 425 0. 419 0. 414 0. 408
531 532 533 534 535 536 537 538 536 537 538 541 543 545 545 547 548 5551 5554 5555 5555 5555 5555 555 555 5	23.90 23.95 23.99 24.04 24.08 24.13 24.22 24.26 24.31 24.35 24.44 24.53 24.44 24.53 24.67 25.67 25.03 25.07 25.12 25.16 25.25	-1.40 -1.48 -1.56 -1.64 -1.72 -1.80 -1.88 -1.96 -2.04 -2.13 -2.22 -2.38 -2.54 -2.54 -2.54 -2.63 -2.88 -2.88 -2.97 -3.280 -3.23 -3.59 -3.59 -3.76 -3.85 -3.95	78.43 78.36 78.29 78.22 78.14 78.06 77.98 77.98 77.61 77.61 77.61 77.61 77.61 77.61 77.61 77.61 77.61 77.61 77.61 77.61 77.61 77.61 77.62 76.95 76.629 76.643 76.56 75.53 75.536 75.202 74.85	0. 408 0. 403 0. 397 0. 392 0. 386 0. 381 0. 375 0. 370 0. 365 0. 365 0. 355 0. 350 0. 355 0. 350 0. 344 0. 339 0. 334 0. 339 0. 334 0. 330 0. 325 0. 320 0. 315 0. 310 0. 306 0. 301 0. 296 0. 292 0. 287 0. 283 0. 278 0. 274 0. 270 0. 265 0. 265 0. 261
562 563 564 565 566 567 568 569 570 571 572 573	25. 30 25. 34 25. 39 25. 43 25. 48 25. 52 25. 57 25. 61 25. 66 25. 70 25. 75 25. 79	-4.04 -4.13 -4.22 -4.31 -4.40 -4.50 -4.59 -4.68 -4.78 -4.87 -4.87 -5.06	74. 67 74. 48 74. 30 74. 10 73. 91 73. 71 73. 50 73. 29 73. 08 72. 86 72. 64 72. 41	0. 257 0. 253 0. 248 0. 244 0. 240 0. 236 0. 232 0. 228 0. 225 0. 221 0. 217 0. 213 Page 12

$\begin{array}{l} 574\\ 5755555555555555555555555555555555$	$\begin{array}{c} 25.84\\ 25.88\\ 25.93\\ 26.07\\ 26.11\\ 26.26\\ 26.29\\ 26.34\\ 26.56\\ 26.29\\ 26.34\\ 26.56\\ 26.29\\ 26.34\\ 26.56\\ 26.65\\ 26.65\\ 26.65\\ 26.65\\ 26.65\\ 26.70\\ 27.10\\ 27.10\\ 27.15\\ 27.27\\ 27.57\\ 27.57\\ 27.57\\ 27.55\\ 27.60\\ 27.55\\ 27.60\\ 27.75\\ 27.55\\ 27.60\\ 27.75\\ 27.55\\ 27.60\\ 27.75\\ 27.60\\ 27.75\\ 27.60\\ 27.75\\ 27.88\\ 27.75\\ 27.88\\ 27.75\\ 27.60\\ 27.60\\ 27.75\\ 27.60\\ 27.75\\ 27.60\\ 27.75\\ 27.60\\ 28.00\\ 28.14\\ 28.27\\ 28.37\\ 28$	$\begin{array}{c} -5. \ 16\\ -5. \ 25\\ -5. \ 35\\ -5. \ 54\\ -5.\ 54\\ -5.\ 54\\ -5.\ 54\\ -5.\ 54\\ -5.\ 54\\ -5.\ 54\\ -5.\ 54\\ -5.\ 54\\ -5.\ 54\\ -5.\ 54\\ -5.\ 54\\ $	$\begin{array}{c} 72. \ 18\\ 71. \ 95\\ 71. \ 71\\ 71. \ 22\\ 70. \ 97\\ 70. \ 71\\ 70. \ 45\\ 89. \ 91\\ 69. \ 64\\ 69. \ 96\\ 69. \ 79\\ 66. \ 62\\ 65. \ 65\\ 65\\ 65\\ 65\\ 65\\ 65\\ 65\\ 65\\ 65\\ 65\\$	report 0. 209 0. 206 0. 202 0. 199 0. 195 0. 191 0. 188 0. 185 0. 181 0. 175 0. 171 0. 168 0. 165 0. 162 0. 159 0. 156 0. 152 0. 159 0. 156 0. 152 0. 149 0. 147 0. 144 0. 138 0. 135 0. 132 0. 130 0. 127 0. 124 0. 122 0. 114 0. 122 0. 109 0. 107 0. 104 0. 098 0. 095 0. 087 0. 085 0. 087 0. 077 0. 075 0. 073 0. 071 0. 068 0. 064 0. 063 0. 061
627	28. 23	-10.59	53.36	0.068
628	28. 27	-10.67	52.88	0.066
629	28. 32	-10.74	52.40	0.064
630	28. 37	-10.82	51.91	0.063

700 701 702 703 704 705 706 707 708 709 710 711 712 713 714 715 716 717 718 719 720 721 722 723 724 725 726 727 728 729 730 731 732 733 734 735 736 737 738 739 730 731 732 733 734 735 736 737 738 739 740 751 742 743 744 745 746 747 748 749 750 751 752 753 755	$\begin{array}{c} 31.52\\ 31.61\\ 31.66\\ 31.75\\ 31.61\\ 31.75\\ 31.88\\ 31.97\\ 32.06\\ 32.222\\ 32.32\\ 32.222\\ 32.33\\ 32.66\\ 32.65\\ 32.66\\ 32.65\\ 32.66\\ 32.66\\ 32.66\\ 32.66\\ 33.15\\ 33.22\\ 32.66\\ 33.15\\ 33.22\\ 32.66\\ 33.15\\ 33.22\\ 33.33\\ 33.35\\ 33.35\\ 33.66\\ 33.55\\ 33.66\\ $	$\begin{array}{c} -16. \ 87\\ -16. \ 97\\ -17. \ 06\\ -17. \ 16\\ -17. \ 26\\ -17. \ 35\\ -17. \ 45\\ -17. \ 55\\ -17. \ 64\\ -17. \ 74\\ -17. \ 64\\ -17.$	8.55 7.78 7.02 6.24 5.47 4.69 3.11 2.32 1.52 0.72 -0.40 -0.79 -1.55 -1.91 -2.61 -2.94 -3.290 -4.79 -4.77 -5.31 -5.50 -6.489 -7.26 -6.489 -7.26 -7.44 -7.50 -7.44 -7.75 -7.90 -8.03 -8.50 -	$\begin{array}{c} \text{report}\\ 0.\ 003\\ 0.\ 003\\ 0.\ 002\\ 0.\ 002\\ 0.\ 002\\ 0.\ 002\\ 0.\ 001\\ 0.\ 001\\ 0.\ 001\\ 0.\ 001\\ 0.\ 000\\ 0.\ 000\\ 0.\ 000\\ 0.\ 000\\ 0.\ 000\\ 0.\ 000\\ -0.\ 001\\ -0.\ 001\\ -0.\ 001\\ -0.\ 001\\ -0.\ 002\\ -0.\ 002\\ -0.\ 002\\ -0.\ 002\\ -0.\ 002\\ -0.\ 002\\ -0.\ 003\\ -0.\ 003\\ -0.\ 003\\ -0.\ 003\\ -0.\ 003\\ -0.\ 003\\ -0.\ 003\\ -0.\ 003\\ -0.\ 003\\ -0.\ 003\\ -0.\ 003\\ -0.\ 003\\ -0.\ 003\\ -0.\ 004\\ -0.\ 004\\ -0.\ 004\\ -0.\ 004\\ -0.\ 005\\ -0.\ 006\\ -0.\ 006\\ -0.\ 006\\ -0.\ 006\\ -0.\ 006\\ -0.\ 006\\ -0.\ 006\\ -0.\ 006\\ -0.\ 006\\ -0.\ 006\\ -0.\ 006\\ -0.\ 006\\ -0.\ 007\\ -0.\$	
749 750 751 752 753	33.73 33.78 33.82 33.87 33.91	-9.98 -9.78 -9.58 -9.37 -9.17	-8.84 -8.89 -8.92 -8.95 -8.97	-0.014 -0.015 -0.015 -0.015 -0.015 -0.016	

The above data can be selected using mouse, then copy and paste into $\ensuremath{\mathsf{Excel}}$ to create graphics

APPENDIX D

Bioremediation Design Parameters

Table D-1 Volume Estimates Bioremediation Design Parameters Blaine Marina, Inc. Site – Blaine, Washington

Bio Quick Estimate

Injection Volume Estimate

Large Excavation:

5200 SF (minus sloped walls) 3 FT GW rise 0.3 Porosity 4680 CF Volume 35,006 Gallons Comparison to injection well grid (15 ft centers): 23.1 wells

1,514.70 gal/well

Infiltration Trenches

 Trench
 3 FT Width

 30 FT Length
 8 FT freeboard above w.t.

 8 FT freeboard above w.t.
 Shallowest groundwater measured at site was 8 ft bgs

 0.3 Porosity
 216 Trench Volume (CF)

 each
 1,616 Trench Volume (Gal)

 2 trenches
 3,231.36

38,238 Calculated total site Injection Volume 40,000 Roundup

Site Total per injection event	40,000	gallons
Pumping Time at 50 gpm	800.00	minutes
	13.33	hours

Table D-2 Estimating Ammonium Nitrate Requirements Bioremediation Design Parameters Blaine Marina, Inc. Site – Blaine, Washington

Ratio to initial nitrate concentration Nitrate concentration (mg-N/L) Nitrate concentration (mg/L)	1x 225 1,000	2x 450 2,000	3x 675 3,000	4x 900 4,000	5x 1,125 5,000	6x 1,350 6,000	7x 1,575 7,000	8x 1,800 8,000	9x 2,025 9,000	10x 2,250 10,000
				Р	ounds per	1,000 galloi	าร			
Ammomium nitrate fertilizer ^a	15	30	45	60	75	90	105	120	135	150
Monoammonium phosphate fertilizer ^b	2.5	5	7.5	10	12.5	15	17.5	20	22.5	25
Yeast extract ^c	1	1	1	1	1	1	1	1	1	1
	-									
	Pounds per 40,000 gallons - initial injection volume									
Ammomium nitrate fertilizer ^a	600	1,200	1,800	2,400	3,000	3,600	4,200	4,800	5,400	6,000
Monoammonium phosphate fertilizer ^b	100	200	300	400	500	600	700	800	900	1,000

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^a Wilbur Ellis CAN-27 (27-0-0) or equivalent

Yeast extract^c

^b Wilbur Ellis Perfection 11-52-0 monoammonium phosphate or equivalent

^c Cascade Columbia Yeast hydrolysate enzymatic or equivalent

mg-N/L = milligram per liter as nitrate.

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Table D-3 Stoichimetry of TPH Biodegradation with Nitrate Bioremediation Design Parameters Blaine Marina, Inc. Site – Blaine, Washington

The design approach is empirical (based on results at other similar sites), not stoichiometric . However, a discussion of the stoichiometry is presented for information below.

If fully used for total petroleum hydrocarbon (TPH) degradation, it takes about 5 lbs of nitrate to degrade 1 lb of TPH/benzene, toluene, ethylbenzene, and xylenes (BTEX), as follows. The reaction for benzene mineralization using nitrate as the terminal electron acceptor (below) is used to estimate the mass of nitrate required for degradation of TPH components.

$6NO_3^- + 6H^+ + C_6H_6 \rightarrow 6CO_2 + 6H_2O + 3N_2$

As indicated in the formula above, six moles of nitrate are necessary to degrade one mole of benzene. The formula weights for nitrate and benzene are 62 grams/mole and 78 grams/mole, respectively. Therefore, 4.77 grams of nitrate [6 moles x nitrate molecular weight (62)/ benzene molecular weight (78)] are required for degradation of 1 gram of benzene. Similar ratios apply for toluene (4.71:1), ethylbenzene (4.67:1), and xylenes (4.67:1), and comparable ratios are expected for other gas-range petroleum hydrocarbons. The resulting mass ratio of approximately 5:1 (nitrate:BTEX/TPH) is based on the assumption that all nitrate is used by micro-organisms to obtain energy through degradation of TPH components.

The ammonium nitrate fertilizer used as the nitrate source contains about 5% by weight inert dolomite material. Based on molecular weight, about 80% of the remaining material is composed of nitrate and 20% is ammonium. Therefore, the 600 lbs of ammonium nitrate fertilizer planned for the first 40,000-gallon injection contains about 456 lbs of nitrate (600x0.95x0.80=456 lbs nitrate). Based on the TPH stoichiometry noted above, this 456 lbs of nitrate could degrade about 91 lbs of TPH (corresponds to about 13 gallons of diesel).

TPH mass will remain following excavation, but is likely to be substantially more than the equivalent of 13 gallons of diesel. For this reason, the work plan anticipates multiple injections with anticipated increasing concentrations of nitrate. Nitrate concentration changes will be based on monitoring results that will evaluate the distribution and longevity of injected nitrate.

EXHIBIT D

Schedule

EXHIBIT D Schedule

The schedule for implementing the scope of work specified in this Consent Decree (CD) is presented below. If at any time during the implementation process, unanticipated conditions or changed circumstances are discovered that might result in a schedule delay, the Port shall bring such information to the attention of Ecology. Ecology will determine whether a schedule extension is warranted under the CD.

All completion times refer to calendar days. Any completion times that fall on a holiday or weekend will be extended to the next working day.

Work and Deliverables	Completion Times				
Construction:					
Complete construction procurement	Within 120 days following the effective date of the CD				
Complete construction ¹ (Demolition, source removal, bioremediation infiltration trenches, surface restoration)	Within 180 days following procurement				
Post Construction:					
Submit Construction Completion Report to Ecology	Within 90 days of completing construction				
Complete Post-Construction Baseline Groundwater Evaluation and submit draft Bioremediation and Cleanup Operations Plan to Ecology for review	Within 90 days of completing construction				
Submit Final Bioremediation and Cleanup Operations Plan to Ecology	Within 45 days of receipt of Ecology comments on Draft plan				
Submit Quarterly Progress Reports	Last day of the month following the completion of each quarter after the effective date of the CD				
Implement bioremediation program then monitored natural attenuation (if needed) to reduce concentrations of indicator hazardous substances (IHSs) to below cleanup levels in the Cleanup Action Plan	Commence within 45 days of Ecology's approval of the Final Bioremediation and Cleanup Operations Plan				
Submit Annual Groundwater Quality Reports (Groundwater quality, remedial progress, updated estimate of restoration timeframe, recommendations for program modifications [if needed])	Annual basis until remediation is complete, beginning one year following initiation of bioremediation program				

¹ Source removal excavation activities must be conducted during the dry season, when groundwater levels are lowest to allow safe access for excavation (between August and October). If unforeseeable project delays prevent excavation from occurring in this window, excavation will be postponed to the same season during the next calendar year.

EXHIBIT E

Applicable Substantive Requirements of Procedurally Exempt Permits or Approvals

EXHIBIT E Applicable Substantive Requirements of Procedurally Exempt Permits or Approvals

City of Blaine Building Demolition Permit (Blaine Municipal Code 15.04.010)

Pursuant to the City of Blaine Building Codes Ordinance (Blaine Municipal Code [BMC] 15.04), the demolition of buildings must meet the standards and requirements of the International Building Code published by the International Code Council, Inc., the Uniform Plumbing Code, the National Fuel Gas Code, and the 1997 Edition of the Uniform Code for the Abatement of Dangerous Buildings published by the International Conference of Building Officials, as set forth in BMC 17.84. City standards and requirements include the proof of abatement of any asbestos-containing material prior to demolition. Proof of abatement shall be provided by the Northwest Clean Air Agency.

City of Blaine Land Disturbance Permit (BMC 17.84.060)

Pursuant to the City of Blaine Land Disturbance Ordinance (BMC 17.84), a Land Disturbance permit is required from the City for any projects that involve excavation, grading, or filling. The City Land Disturbance ordinance identifies a number of standards and requirements for obtaining a permit. The City standards and requirements will be integrated into the construction plans and specifications where applicable for the cleanup action to ensure it complies with the substantive requirements of the City ordinance. Those substantive requirements include: site plans with 5- or 2-foot contours; locations of all existing drainage facilities, structures, and utilities; erosion control measures; proper work plan of sequenced clearing, grading, filling, drainage alteration, and other land-disturbing activities; adequate earth material storage and disposal; sediment control measures; hydrologic and hydraulic computations; engineering, geological soils reporting; soil stabilization with proper Best Management Practices (BMPs); limited construction access, if practicable; and permanent erosion control, if applicable.

City of Blaine Shoreline Development Permit (BMC 17.81)

Pursuant to the City of Blaine Shoreline Management Master Program (BMC 17.81), the cleanup action must meet the requirements of the City Shoreline Development Permit (SMP). The cleanup action will occur within the regulated shoreline area as designated by BMC Title 17.81 as Urban Environment. The substantive requirements include meeting the general conditions for an SMP, requirements and conditions of the Urban Environment – Marina designation, and applicable general regulations and use activity policies.

City of Blaine Critical Area Development Permit (BMC 17.82.440)

Critical Area Ordinance substantive requirements are applied to land development activities in the City of Blaine. The cleanup action will occur on land classified by the City as a "seismic hazard area." The City standards and requirements will be integrated into the construction plans and specifications where applicable for the cleanup action to ensure it complies with the substantive requirements of the City ordinance. Those substantive requirements stipulate that cleanup activities will: not increase surface water discharge or sedimentation to other properties, not decrease slope stability, and minimize disturbance of trees and other vegetation.

Washington State Department of Ecology Underground Injection Well Registration (WAC 173-218)

Pursuant to the Safe Drinking Water Act administered under Title 40 of the Code of Federal Regulations Part 144 and the Underground Injection Control (UIC) Program (WAC 173-218), all injection wells must receive proper permitting or authorization to operate. Underground injection wells operating under a Model Toxics Control Act cleanup order, agreed order, or consent decree do not require a permit but do require registration with the UIC program (WAC 173-218-060). Installed and operating underground injection wells will meet the requirements and standards set forth in WAC 173-218.