Blaine Marina Tank Farm Site Overview Blaine, Washington

November 17, 2011

Prepared for

Port of Bellingham Bellingham, Washington



BLAINE MARINA TANK FARM OVERVIEW BLAINE, WASHINGTON

INTRODUCTION

This document presents a brief overview of the Blaine Marina Tank Farm Site (Site) to support discussions between the Washington State Department of Ecology (Ecology) and the Port of Bellingham (Port) regarding development of an agreed order to conduct a remedial investigation/feasibility study (RI/FS) for the Site and an interim action to repair a section of failing bulkhead at the Site shoreline, as discussed in the Known Environmental Conditions section below. A number of previous Site environmental investigations have identified the release of petroleum hydrocarbons from the fueling facility to Site soil and groundwater. The Site is currently listed on the Ecology Hazardous Sites List (FSID 2888) and ranked 3 out of 5 on its priority list for cleanup, with a ranking of 1 being the highest priority for cleanup.

The Site is located within Blaine Harbor in Blaine, Washington, as shown on Figure 1. More specifically, the Site is located in the western portion of the Blaine Harbor industrial area, as shown on Figure 2. The Inner Harbor Line shown on Figure 2 defines the boundary between Port property and State land managed by the Washington Department of Natural Resources (DNR), with State land located to the west of the Inner Harbor Line. Available data indicate that the extent of contamination, and thus the Site boundary, extends onto State land, as shown on Figure 3.

The following sections of this Site overview provide a brief Site history, present available environmental data, and identify anticipated constituents of concern (COCs) based on the available environmental data.

SITE HISTORY

Blaine Harbor is located within the northern portion of Drayton Harbor at the entrance to Semiahmoo Bay, as shown on Figure 1. A small boat harbor and marina were created when aquatic lands were dredged prior to 1949. The upland industrial area was created at that time and was generally constructed of hydraulic fill with timber bulkheads along the shoreline, although in some areas riprap was used instead of, or in conjunction with, the bulkheads to establish the shoreline. Industrial area features are shown on the Blaine Harbor Industrial Area Site Plan (Figure 2). The marina was expanded several times since its original construction, but the footprint of the upland industrial area has remained largely unchanged.

Blaine Marina is the name of the family-owned business that operates the tank farm fueling facility. The tenant has leased the area indicated on Figure 2 from the Port since the 1950s. In 1955, the tenant installed three aboveground storage tanks (ASTs) to store gasoline and diesel fuel for dispensing at

the fueling dock, and also for filling tanker trucks for delivery of home heating oil. The facility has been operated continuously from 1955 to present.

KNOWN ENVIRONMENTAL CONDITIONS

Several investigations have been conducted at the Site since 1990 to investigate soil and groundwater quality for releases of petroleum hydrocarbons from facility operations. At least one documented fuel spill occurred at the Site on May 2, 1990. The sampling locations for these investigations are shown on Figure 3 and the analytical results are summarized in Tables 1 and 2. Additionally, in 2001 the Port conducted a marina-wide sediment investigation that collected and analyzed surface sediment samples BH-01, BH-09, and BH-10 in the vicinity of the Site uplands. The analytical results for surface sediment samples collected in the Site vicinity are summarized in Table 3.

As shown in Tables 1 and 2, and on Figure 3, analysis of samples collected from many of these locations indicate concentrations of diesel-range petroleum hydrocarbons in soil and groundwater exceed the preliminary screening levels. Additionally, product sheen was observed in soil and groundwater over a large area in the vicinity of the ASTs, as shown on Figure 3. The tenant has been conducting passive product recovery from existing monitoring wells MW-2 and MW-3 by using bailing equipment and absorbent pads since 1997. While available data suggest that extent of soil and groundwater was generally bounded to the north, west, and south during previous investigations, most of the data are 15 to 20 years old, so available data may not represent current conditions. Additionally, it is not known whether utilities such as the pipelines to the fuel dock shown on Figure 3 may provide preferential pathways for contaminant migration that could result in contamination extending to areas such as the fuel office area at the shoreline.

Available sediment quality data in the Site vicinity do not indicate that Site releases have impacted sediment quality. At sample location BH-01, the detected concentration of bis(2-ethylhexyl)phthalate (BEHP) exceeded both the Sediment Quality Standards (SQS), and the Cleanup Screening level (CSL) established in the Sediment Management Standards (WAC 173-304). However, BEHP is not associated with known Site releases or activities, and is a common laboratory contaminant; if present, it would not be related to the petroleum hydrocarbon constituents associated with Site releases.

The potential for soil and groundwater contamination to be present in the vicinity of the fuel office is of particular concern because the bulkhead underlying and supporting the eastern side of the fuel office is deteriorating and has partially failed, as shown in the attached photographs. Further failure of the bulkhead could result in the release of contaminated soil and groundwater to surface water and sediment, exacerbating the extent of Site contamination. As a result, the Port intends to conduct an

interim action to repair the section of failing bulkhead before more catastrophic failure can occur that could threaten surface water and sediment quality. Because the Port anticipates replacing the entire bulkhead in this area during future redevelopment of the Site, a temporary repair will be conducted for the interim action.

ATTACHMENTS

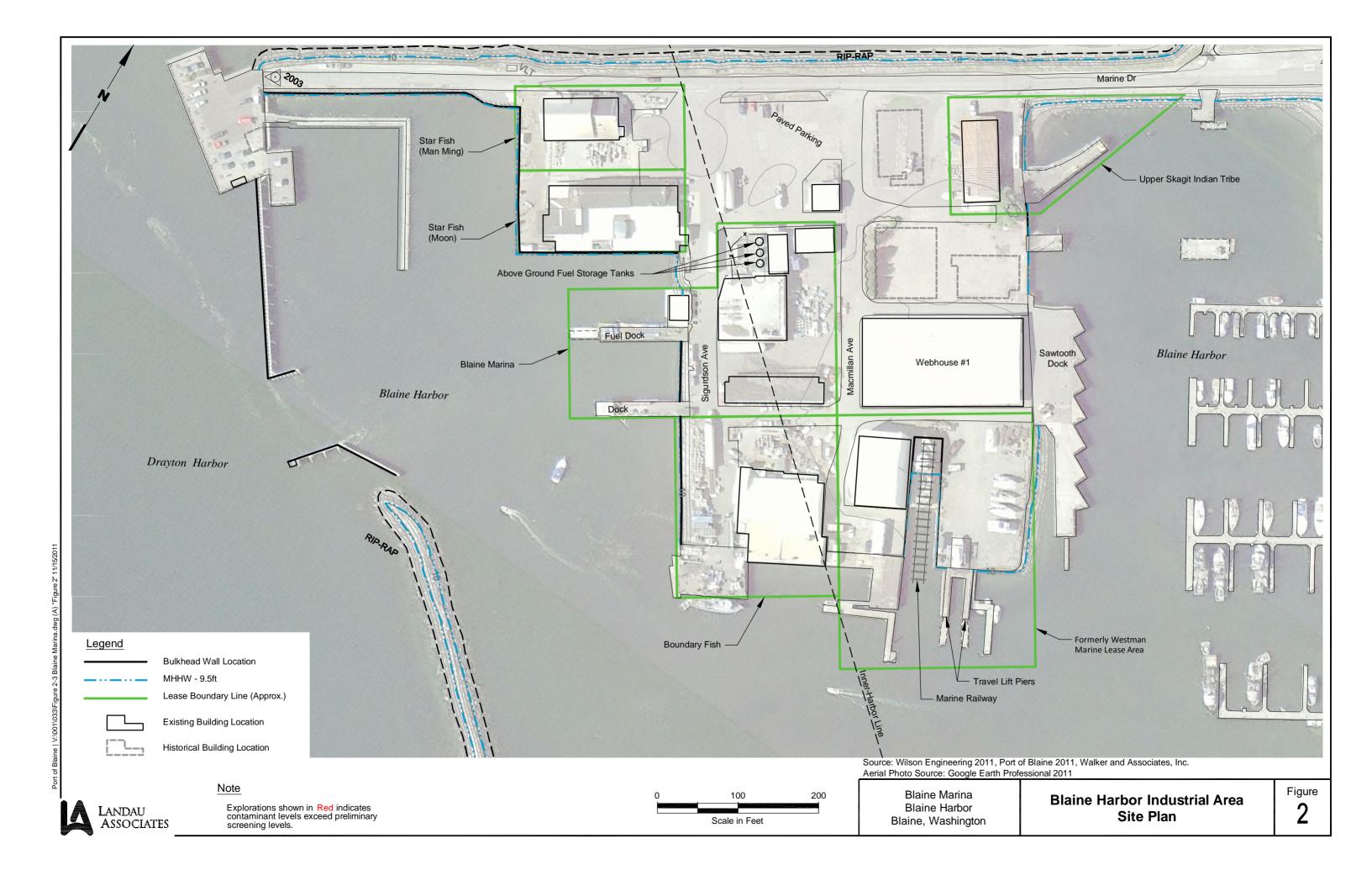
Figure 1: Vicinity Map

Figure 2: Blaine Harbor Industrial Area Site Plan Figure 3: Blaine Marina Tank Farm Site Plan

Table 1: Summary of Upland Soil Analytical Results – Previous Investigations
 Table 2: Summary of Groundwater Analytical Results – Previous Investigations
 Table 3: Summary of Sediment Analytical Results – Previous Investigation

Photos 1 & 2: Photographs of Failing Bulkhead





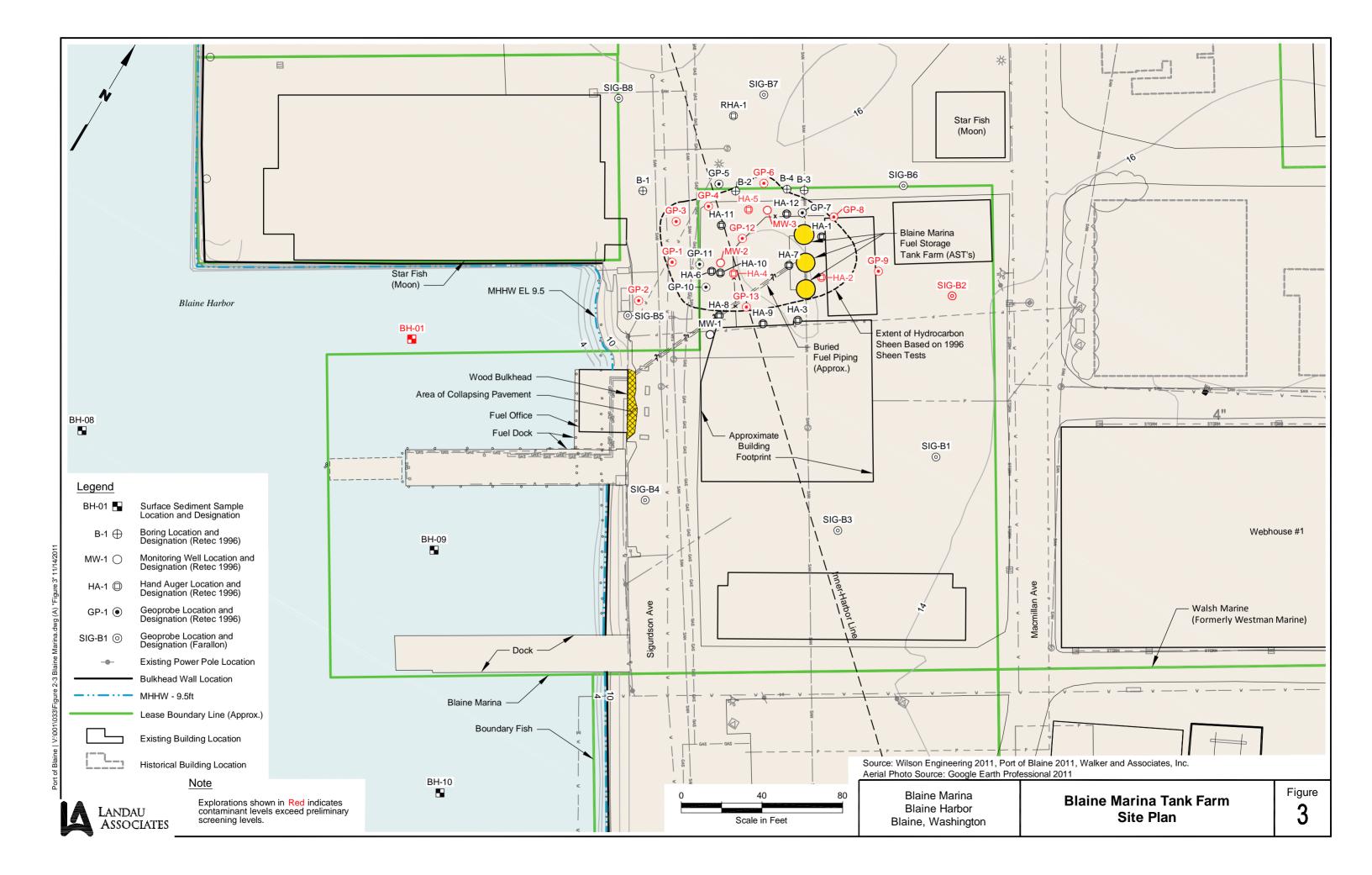


TABLE 1
SUMMARY OF UPLAND SOIL ANALYTICAL RESULTS - PREVIOUS INVESTIGATIONS
BLAINE MARINA TANK FARM - BLAINE, WASHINGTON

Sample ID	Screening	B-1	SIG-B1	5	SIG-B2		SIG-B3		SIG-B4		SIG-B5		SIG-B6		SIG-B7		SIG-B8		SIG-B10		HA-1
Sample Date	Level	Unknown	1/7/2008	1/	/7/2008		1/7/2008		1/7/2008		1/7/2008		1/7/2008		1/7/2008		1/7/2008		1/8/2008		5/8/1990
Petroleum Hydrocarbons (mg/kg)																					
Total Petroleum Hydrocarbons (a)	2,000	34	NA		NA		NA		NA		NA		NA		NA		NA		NA		1,600
Gasoline Range Organics	100/30	NA	3.5	U	8.4	U	4.1	U	5.4	U	4.1	U	4.2	U	4	U	4.3	U	6.9	U	
Diesel Range Organics	2,000	NA	27	U	3,300		33	U	32	U	34	U	34	U	34	U	33	U	19,000		
Motor Oil	2,000	NA	68		68	U	70		64	U	68	U	68	U	210		66	U	15,000		
BTEX (mg/kg)																					
Benzene	0.03	NA	0.02	U	0.02	U	0.02	U	0.02	U	0.02	U	0.02	U	0.02	U	0.02	U	0.18		
Toluene	7	NA	0.35	U	0.084	U	0.041	U	0.054	U	0.041	U	0.042	U	0.04	U	0.043	U	0.069	U	
Ethylbenzene	6	NA	0.35	U	0.084	U	0.041	U	0.054	U	0.041	U	0.042	U	0.04	U	0.043	U	0.72		
m, p-Xylene	9 total	NA	0.35	U	0.084	U	0.041	U	0.054	U	0.041	U	0.042	U	0.04	U	0.043	U	0.46		
o-Xylene	ุ ฮ เปเลเ	NA	0.35	U	0.084	U	0.041	U	0.054	U	0.041	U	0.042	U	0.04	U	0.043	U	0.15		

TABLE 1 SUMMARY OF UPLAND SOIL ANALYTICAL RESULTS - PREVIOUS INVESTIGATIONS BLAINE MARINA TANK FARM - BLAINE, WASHINGTON

Sample ID Sample Date	U	HA-2 5/8/1990	HA-3 5/8/1990	HA-4 5/8/1990	HA-5 5/8/1990	HA-6 5/8/1990	HA-7 5/8/1990	HA-8 5/8/1990	HA-9 5/8/1990	HA-10 5/8/1990	HA-11 5/8/1990	HA-12 5/8/1990
Petroleum Hydrocarbons (mg/kg) Total Petroleum Hydrocarbons (a) Gasoline Range Organics Diesel Range Organics Motor Oil	2,000 100/30 2,000 2,000	16,000	1,400	12,000	11,000	10	389	407	183	217	10	732
BTEX (mg/kg) Benzene Toluene Ethylbenzene m, p-Xylene o-Xylene	0.03 7 6 9 total											

Bold = Detected compound.

Boxed value = Concentration exceeds screening level.

NA = Not Analyzed.

Screening Level = Washington State Model Toxics Control Act Method A Cleanup Level for Unrestricted Land Uses.

Sample results presented in milligrams per kilogram

U = Indicates the compound was undetected at the reported concentration.

(a) Historical data do not distinguish between gasoline-, diesel-, or motor oil-range total petroleum hydrocarbons.

TABLE 2 SUMMARY OF GROUNDWATER ANALYTICAL RESULTS - PREVIOUS INVESTIGATIONS BLAINE MARINA TANK FARM - BLAINE, WASHINGTON

Sample ID	Screening	GP-1	GP-10	GP-11	GP-12	GP-13	GP-2	GP-3	GP-4	GP-5	GP-6	GP-7	GP-8
Sample Date	Level	7/19/1996	7/19/1996	7/19/1996	7/19/1996	7/19/1996	7/19/1996	7/19/1996	7/19/1996	7/19/1996	7/19/1996	7/19/1996	7/19/1996
Diesel Range Organics (mg/L)	0.5	55	251	85.6	FP	33.5	1.4	160.5	27.5	0.2	54.7	0.2	11.4

TABLE 2 SUMMARY OF GROUNDWATER ANALYTICAL RESULTS - PREVIOUS INVESTIGATIONS BLAINE MARINA TANK FARM - BLAINE, WASHINGTON

Sample ID	Screening	GP-9	MW-1	MW-2	MW-3
Sample Date	Level	7/19/1996	7/19/1996	7/19/1996	7/19/1996
Diesel Range Organics (mg/L)	0.5	13.4	0.1	FP	FP

Bold = Detected compound.

Boxed Value = Concentration exceeds screening level.

FP = Free product encountered during sample collection; sample concentration assumed to exceed screening level.

NA = Not analyzed.

Screening Level = Washington State Model Toxics Control Act Method A Cleanup Levls for Groundwater.

U = Indicates the compound was undetected at the reported concentration.

TABLE 3
SUMMARY OF SEDIMENT ANALYTICAL RESULTS - PREVIOUS INVESTIGATION
BLAINE MARINA TANK FARM - BLAINE, WASHINGTON

s	Sample ID	SQS (a)	CSL (b)	BH-01 9/27/2001	BH-08 9/27/2001	BH-09 9/27/2001	BH-10 9/27/2001
Metals (mg/kg)			<u> </u>				
Arsenic		57	93	6 U			
Cadmium		5.1	6.7	1.1			
Chromium		260	270	28.4			
Copper		390	390	76.8 J			
Lead		450	530	13 J			
Mercury		0.41	0.59	0.09 J			
Silver		6.1	6.1	0.3			
Zinc		410	960	103			
PCBs (mg/kg OC) (c)							
Aroclor 1016		NA	NA	1.2 U			
Aroclor 1242		NA	NA	1.2 U			
Aroclor 1248		NA	NA	1.2 U			
Aroclor 1254		NA	NA	1.2 U			
Aroclor 1260		NA	NA	1.2 U			
Aroclor 1221		NA	NA	2.4 U			
Aroclor 1232		NA	NA	1.2 U			
Total PCBs (d)		12	65	2.4 U			
PAHs (mg/kg OC) (c)							
Naphthalene		99	170	1.2 U	1.1 U	1.3 U	
Acenaphthylene		66	66	6.1	2.8	2.8	
Acenaphthene		16	57	1.7	1.1 U	1.4 M	
Fluorene		23	79	2.9	2.0	2.1	
Phenanthrene		100	480	28.1	17.2	25.3	
Anthracene		220	1,200	17.5	6.7	7.3	
2-Methylnaphthalene		38	64	1.2 U	1.1 U	1.3 U	
LPAH (d)(e)		370	780	56.3	28.7	39.0	
Fluoranthene		160	1,200	87.5	32.2	47.3	
Pyrene		1,000	1,400	87.5	31.1	46.0	
Benzo(a)anthracene		110	270	35.0	16.1	20.0	
Chrysene		110	460	68.8	28.3	34.7	
Benzo(b)fluoranthene		NA	NA	55.0	15.6	24.0	
Benzo(k)fluoranthene		NA	NA	55.0	16.7	24.0	
Total Benzofluoranthenes (f)		230	450	110.0	32.2	48.0	
Benzo(a)pyrene		99	210	28.8	15.0	20.7	

TABLE 3
SUMMARY OF SEDIMENT ANALYTICAL RESULTS - PREVIOUS INVESTIGATION
BLAINE MARINA TANK FARM - BLAINE, WASHINGTON

Indeno(1,2,3-c,d)pyrene		Sample ID Sample Date	SQS (a)	CSL (b)	BH-01 9/27/2001	BH-08 9/27/2001	BH-09 9/27/2001	BH-10 9/27/2001
Dibenz(a,h)anthracene 12 33 3.2 1.8 2.8 Benzo(g)h,liperylene 31 78 9.4 7.8 12.0 HPAH (d)(g) 960 5,300 449.4 172.4 244.8 SVOSs (mg/kg OC) (c)	Indone(4.0.0 ad)numene	Campio Bato						0/21/2001
Benzo(g,h,i)perylene 31								
HPAH (d)(g) 960 5,300 449.4 172.4 244.8	,							
SVOCs (mg/kg OC) (c) 1,2-Dichlorobenzene 2.3 2.3 1.2 U 1.1 U 1.3 U 1,3-Dichlorobenzene NA NA NA 1.2 U 1.1 U 1.3 U 1,2-Dichlorobenzene 3.1 9 1.2 U 1.1 U 1.3 U 1.3 U 1,2-Dichlorobenzene 0.81 1.8 1.2 U 1.1 U 1.3 U 1.3 U 1.2,4-Trichlorobenzene 0.81 1.8 1.2 U 1.1 U 1.3 U 1.3 U 1.0 1.3 U 1.0 1.3 U 1.0 1.0 U 1.1 U 1.3 U 1.0 1.3 U 1.3 U 1.0 1.3 U 1.3 U 1.0 1.3 U 1.0 1.3 U 1.0 1.3 U 1.0 1.3 U 1.3 U 1.0 1.3 U 1.0 1.3 U 1.0 1.3 U 1.0 1.3 U 1.3 U 1.0 1.3 U 1.0 1.3 U 1.0 1.3 U 1.0 1.3 U 1.3 U 1.0 1.3 U 1.3 U 1.0 1.3 U 1.0 1.3 U 1.0 1.3 U 1.0 1.3 U 1.3 U 1.0 1.3 U 1.0 1.3 U 1.0 1.3 U 1.0 1.3 U 1.3 U 1.0 1.3 U 1.0 U 1.3 U 1.0 U 1.3 U 1.0 U						-		
1,2-Dichlorobenzene 2.3 2.3 1.2 U 1.1 U 1.3 U 1.3 U 1,3-Dichlorobenzene NA NA NA 1.2 U 1.1 U 1.3 U 1.4 U	HPAH (d)(g)		900	5,300	449.4	172.4	244.0	
1,2-Dichlorobenzene 2.3 2.3 1.2 U 1.1 U 1.3 U 1.3 U 1,3-Dichlorobenzene NA NA NA 1.2 U 1.1 U 1.3 U 1.4 U	SVOCs (mg/kg OC) (c)							
1,3-Dichlorobenzene	, , ,		2.3	2.3	1.2 U	1.1 U	1.3 U	
1,4-Dichlorobenzene 3.1 9 1,2 U (h) 1.1 U (h) 1.3 U (h) 1,2,4-Trichlorobenzene 0.81 1.8 1.2 U (h) 1.1 U (h) 1.3 U (h) Hexachlorobenzene 0.38 2.3 0.06 U 1.1 U (h) 1.3 U (h) Dimethylphthalate 53 53 1.8 1.1 U 2.5 Diethylphthalate 61 110 1.2 U 1.1 U 1.3 U Di-n-Butylphthalate 49 64 1.2 U 1.1 U 1.3 U Butylbenzylphthalate 47 78 81.3 7.2 16.0 Di-n-cytl phthalate 47 78 81.3 7.2 16.0 Di-n-cytl phthalate 58 4,500 1.2 U 1.1 U 1.3 U Dibenzofuran 15 58 4,500 1.2 U 1.1 U 1.3 U Hexachlorobutadiene 3.9 6.2 0.06 U 1.1 U 1.3 U N-Nitrosodiphenylamine 11 11 1.2 U 1.1 U 1.3 U SVOCs (µg/kg) Phenol 420 1,200 19 U	•					1.1 U	1.3 U	
1,2,4-Trichlorobenzene	'							
Hexachlorobenzene 0.38 2.3 0.06 U 1.1 U (h) 1.3 U (h)								
Dimethylphthalate	' '				` '	` '	` '	
Diethylphthalate						` '		
Di-n-Butylphthalate 220 1,700 1.2 U 1.1 U 1.3 U	* .			110				
Butylbenzylphthalate								
Discaple of the process of the pro								
Di-n-octyl phthalate				78		7.2		
Dibenzofuran 15 58 1.4 1.1 U 1.3 U 1.3 U 1.3 U 1.4 1.1 U 1.3			58	4,500		1.1 U	1.3 U	
N-Nitrosodiphenylamine 11 11 1.2 U 1.1 U 1.3 U SVOCs (μg/kg) Phenol 420 1,200 19 U 20 U 20 U 2-Methylphenol 63 63 19 U 20 U 20 U 4-Methylphenol 670 670 670 19 U 20 U 64 2,4-Dimethylphenol 29 29 19 U 20 U 20 U 20 U Pentachlorophenol 360 690 120 98 U 99 U 90 U Benzyl Alcohol 57 73 19 U 20 U 20 U 20 U Benzoic Acid 650 650 650 190 U 200 U 200 U Organotins (μg/kg) Tributyltin (as chloride) NA NA 35 24 Tributyltin (as TBT ion) 73 (i) NA 31 1.5 Conventionals Conventionals NA NA 1.6 1.8 1.5 Total Solids (percent) NA NA NA 44.6 52.2 61.5	• •				1.4	1.1 U	1.3 U	
SVOCs (μg/kg) Phenol 420 1,200 19 U 20 U 20 U 2-Methylphenol 63 63 19 U 20 U 20 U 4-Methylphenol 670 670 19 U 20 U 64 2,4-Dimethylphenol 29 29 19 U 20 U 20 U Pentachlorophenol 360 690 120 98 U 99 U Benzyl Alcohol 57 73 19 U 20 U 20 U Benzoic Acid 650 650 190 U 200 U 20 U Organotins (μg/kg) Tributyltin (as chloride) NA NA 35 24 Tributyltin (as TBT ion) 73 (i) NA 31 21 Conventionals Total Organic Carbon (percent) NA NA NA 1.6 1.8 1.5 Total Solids (percent) NA NA 44.6 52.2 61.5	Hexachlorobutadiene		3.9	6.2	0.06 U	1.1 U	1.3 U	
Phenol	N-Nitrosodiphenylamine		11	11	1.2 U	1.1 U	1.3 U	
Phenol	SVOCs (ua/ka)							
2-Methylphenol 63 63 19 U 20 U 20 U 4-Methylphenol 670 670 19 U 20 U 64 2,4-Dimethylphenol 29 29 19 U 20 U 20 U 20 U Pentachlorophenol 360 690 120 98 U 99 U Benzyl Alcohol 57 73 19 U 20 U 20 U 20 U Benzoic Acid 650 650 190 U 200 U 200 U 200 U 0 U 0 U 0 U 0 U 0			420	1.200	19 U	20 U	20 U	
4-Methylphenol 670 670 19 U 20 U 64 2,4-Dimethylphenol 29 29 19 U 20 U 20 U Pentachlorophenol 360 690 120 98 U 99 U Benzyl Alcohol 57 73 19 U 20 U 20 U Benzoic Acid 650 650 190 U 200 U 200 U Organotins (µg/kg) Tributyltin (as chloride) NA NA 35 20 U Tributyltin (as TBT ion) 73 (i) NA 31 21 Conventionals Total Organic Carbon (percent) NA NA NA 1.6 1.8 1.5 Total Solids (percent) NA NA NA 44.6 52.2 61.5				,				
2,4-Dimethylphenol 29 29 19 U 20 U 20 U Pentachlorophenol 360 690 120 98 U 99 U Benzyl Alcohol 57 73 19 U 20 U 20 U Benzoic Acid 650 650 190 U 200 U 200 U Organotins (µg/kg) Tributyltin (as chloride) NA NA 35 24 Tributyltin (as TBT ion) 73 (i) NA 31 21 Conventionals Total Organic Carbon (percent) NA NA 1.6 1.8 1.5 Total Solids (percent) NA NA 44.6 52.2 61.5								
Pentachlorophenol 360 690 120 98 U 99 U						20 U		
Benzyl Alcohol 57 73 19 U 20 U 20 U Benzoic Acid 650 650 190 U 200 U 200 U Organotins (μg/kg) Tributyltin (as chloride) NA NA 35 24 Tributyltin (as TBT ion) 73 (i) NA 31 21 Conventionals Total Organic Carbon (percent) NA NA 1.6 1.8 1.5 Total Solids (percent) NA NA 44.6 52.2 61.5	• • • • • • • • • • • • • • • • • • • •		360	690	120	98 U	99 U	
Benzoic Acid 650 650 190 U 200 U 200 U	•		57	73	19 U	20 U	20 U	
Tributyltin (as chloride) NA NA 35 24 Tributyltin (as TBT ion) 73 (i) NA 31 21 Conventionals Total Organic Carbon (percent) NA NA 1.6 1.8 1.5 Total Solids (percent) NA NA 44.6 52.2 61.5	•		650	650	190 U	200 U	200 U	
Tributyltin (as chloride) NA NA 35 24 Tributyltin (as TBT ion) 73 (i) NA 31 21 Conventionals Total Organic Carbon (percent) NA NA 1.6 1.8 1.5 Total Solids (percent) NA NA 44.6 52.2 61.5	Organotins (µg/kg)							
Conventionals NA 31 21 Conventionals NA NA 1.6 1.8 1.5 Total Organic Carbon (percent) NA NA 44.6 52.2 61.5			NA	NA	35			24
Total Organic Carbon (percent) NA NA 1.6 1.8 1.5 Total Solids (percent) NA NA 44.6 52.2 61.5								
Total Organic Carbon (percent) NA NA 1.6 1.8 1.5 Total Solids (percent) NA NA 44.6 52.2 61.5	Conventionals							
Total Solids (percent) NA NA 44.6 52.2 61.5		ent)	NA	NΑ	1.6	1.8	1.5	
" '		····,						
		cent)	NA	NA	41.2	<u></u>	00	

TABLE 3 SUMMARY OF SEDIMENT ANALYTICAL RESULTS - PREVIOUS INVESTIGATION BLAINE MARINA TANK FARM - BLAINE, WASHINGTON

	Sample ID Sample Date	SQS (a)	CSL (b)	BH-01 9/27/2001	BH-08 9/27/2001	BH-09 9/27/2001	BH-10 9/27/2001
N-Ammonia (mg-N/kg)		NA	NA	38			
Sulfide (mg/kg)		NA	NA	310			
Fecal Coliform (CFU/g)		NA	NA	49 U			

OC = Organic Carbon

NA = Not available.

U = Indicates compound was analyzed for, but was not detected at the given detection limit.

J = Estimated value.

M = Indicates an estimated value of analyte detected and confirmed by analyst with low spectral match parameters.

CFU = Colony-forming units.

Boxed results exceed the SQS.

Shaded results exceed the CSL.

- (a) SMS sediment quality standard (Chapter 173-204 WAC).
- (b) SMS cleanup screening level (Chapter 173-204 WAC).
- (c) Where chemical criteria in this table represent the sum of individual compounds or isomers, the following methods shall be applied:
 - (i) Where chemical analyses identify an undetected value for every individual compound/isomer, then the single highest detection limit shall represent the sum of the respective compounds/isomers.
 - (ii) Where chemical analyses detect one or more individual compounds/isomers, only the detected concentrations will be added to represent the group sum.
- (d) All organic data (except phenols, benzyl alcohol, and benzoic acid) are normalized to total organic carbon; this involves dividing the dry weight concentration of the constituent by the fraction of total organic carbon present.
- (e) The LPAH criterion represents the sum of the following "low molecular weight polycyclic aromatic hydrocarbon" compounds: naphthalene, acenaphthylene, acenaphthene, fluorene, phenanthrene, and anthracene. The LPAH criterion is not the sum of the criteria values for the individual LPAH compounds listed.
- (f) The total benzofluoranthenes criterion represents the sum of the concentrations of the "B," "J," and "K" isomers.
- (g) The HPAH criterion represents the sum of the following "high molecular weight polynuclear aromatic hydrocarbon" compounds: fluoranthene, pyrene, benzo(a)anthracene, chrysene, total benzofluoranthenes, benzo(a)pyrene, indeno(1,2,3-c,d)pyrene, dibenz(a,h)anthracene, and benzo(g,h,i)perylene. The HPAH criterion is not the sum of the criteria values for the individual HPAH compounds as listed.
- (h) Method detection limits exceed the SQS or CSL criteria.
- (i) TBT bulk sediment screening level established by Ecology, which is conceptually equivalent to the SQS.



Photograph 1: Collapsing pavement at bulkhead near fuel office, November 7, 2011



Photograph 2: Aging timber soldier pile bulkhead beneath fuel office, November 7, 2011.

