Supplemental Phase II Environmental Site Assessment Report

Foothill Road
Medford, Oregon 97504
Approximately 6.37-Acre Portion of
Map 371W09 and Taxlot 900

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ALPINE ENVIRONMENTAL CONSULTANTS, LLC

EXECUTIVE SUMMARY

Medford Water retained Alpine Environmental Consultants, LLC (AEC) to conduct a Supplemental Phase II Environmental Site Assessment (ESA) at the property identified as an approximately 6.37-acre portion of Map 371W09 and TL 900 located on Foothill Road in Medford, Oregon (the Site). This Supplemental Phase II ESA work involved a soil investigation.

AEC completed a Phase I ESA for the Site and this report is dated February 27, 2025 (AEC, February 2025). The historical aerial photographs reviewed as part of the Phase I ESA revealed that orchards had been present at the Site from at least the late 1930s through approximately 2010. Based on the results of the Phase I ESA and AEC's extensive work in both Oregon and Washington on properties currently or formerly used as orchards, the historical orchard use and the potential impacts from pesticides use constituted a Recognized Environmental Condition (REC) for the Site. Therefore, AEC recommended a Phase II ESA be conducted to determine if the soil at the Site was adversely impacted by orchard pesticide use and to determine if this potential REC remains a REC or could be eliminated from further consideration.

AEC conducted the Phase II ESA in April 2025 and documented the results in a Phase II ESA Report dated June 7, 2025 (AEC, June 2025). The subsurface investigation included the excavation of 10 test pits (TP1 through TP10) and the collection of five depth-discrete soil samples from each test pit from five depth intervals, specifically from 0.0 to 0.5 feet below ground surface (bgs), 0.5 to 1.0 feet bgs, 1.0 to 1.5 feet bgs, 1.5 to 2.0 feet bgs, and 2.0 to 3.0 feet bgs. The discrete samples from all test pits from the same depth interval were homogenized into five depth discrete composite samples, namely COMP-0.0-0.5, COMP-0.5-1.0, COMP-1.0-1.5, COMP-1.5-2.0, and COMP-2.0-3.0.

The soil samples were submitted for laboratory analyses of orchard-related contaminants, specifically total metals (antimony, arsenic, barium, beryllium, cadmium, chromium, cobalt, copper, lead, nickel, mercury, molybdenum, selenium, silver, thallium, vanadium, and zinc), organochlorine pesticides, organophosphorus pesticides, and chlorinated herbicides. The reported concentrations were compared to the relevant generic risk-based concentrations (RBCs) developed by the Oregon Department of Environmental Quality (DEQ). The generic RBCs applicable to the Site are consistent with the planned commercial land use and assume occupational receptors, construction workers, and excavation workers will be present at the Site. The reported concentrations of metals were also compared to the naturally occurring background concentrations developed for the Cascade Mountains region of Oregon, which includes the eastern part of the Medford area and the Site. All reported concentrations were also compared to the Clean Fill Values listed in DEQ's *Clean Fill Determinations* Internal Management Directive dated February 21, 2019 (DEQ, 2019). Note that the Clean Fill Values for metals coincides with the naturally occurring background concentrations.

The Phase II ESA analytical data reported several constituents in soil samples at concentrations above the laboratory method reporting limits (MRLs). Overall, the analytical results reported in general a higher concentration of metals and pesticides constituents in the upper 0.5 feet of soil than in the underlying layer from 0.5 to 3.0 feet bgs. These data demonstrate concentrations of pesticides constituents attenuate fairly rapidly with depth.

Based on the data collected during the initial Phase II ESA, the reported concentrations of several metals and organochlorine pesticides exceeded the RBCs/or the Clean Fill Values. These exceedances included the following:

- The concentrations of arsenic in soil from 0.0 to 3.0 feet bgs exceeded the generic RBC for the *ingestion, dermal contact, and inhalation exposure pathway* for occupational receptors but only the concentrations of arsenic in soil from 0.0 to 1.0 feet bgs exceeded the naturally occurring background concentration in the Cascade Mountains region.
- The concentrations of arsenic in soil from 0.0 to 1.0 feet bgs also exceeded the generic RBC for the *ingestion, dermal contact, and inhalation exposure pathway* for construction workers.
- The concentrations of lead in soil from 0.0 to 1.0 and 1.5 to 2.0 feet bgs and the concentration of dieldrin in soil from 0.0 to 0.5 feet bgs exceeded the generic RBC for the *leaching to groundwater exposure pathway* for occupational receptors.
- The concentrations of lead in soil from 0.0 to 1.0 feet bgs exceeded the naturally occurring background concentration.
- The concentrations of 4,4'-dichlorodiphenyldichloroethene (4,4'-DDE), 4,4'-dichlorodiphenyltrichloroethane (4,4'-DDT), and dieldrin reported in soil at various depths down to 3 feet bgs exceeded DEQ's Clean Fill Values.

While generic RBCs for occupational receptors and construction workers were exceeded for the aforementioned constituents and exposure pathways, potential risks to human health associated with these constituents and exposure pathways can be managed, mitigated, and/or eliminated from further concern, as follows:

1. The generic occupational RBC under the *soil ingestion, dermal contact, and inhalation exposure pathway* assumes occupational receptors are likely to come into contact with contaminated soils found in the upper 3 feet of soil. The concentrations of arsenic reported in the composite soil samples collected from depths of 0.0 to 3.0 feet bgs exceeded this RBC. However, arsenic exceeded the naturally occurring background concentration only in the composite soil samples collected from 0.0 to 1.0 feet bgs. Prior to property development, if the upper 1.0 feet of soil is not excavated and properly disposed of off of the Site during development, AEC recommends institutional and/or engineering controls be implemented throughout the Site. Institutional and/or engineering control options to protect occupational receptors include but are not limited to the following: removal of shallow soil (at least from 0.0 to 1.0 feet bgs); paving; covering the property with a 3-foot layer of clean compacted fill material; additional investigations to delineate arsenic concentrations in shallow soil; developing an asphalt

cap maintenance plan; developing a Contaminated Media Management Plan (CMMP) with or without DEQ approval; and/or applying a deed notice (e.g. to ensure the asphalt cap is maintained). Another option for consideration is preparation of a Site-specific human health risk assessment to account for the relatively minimal amount of time future workers will be present at the Site.

2. The generic construction workers RBC for total arsenic under the *soil ingestion, dermal contact, and inhalation exposure pathway* assumes construction workers could be exposed over 1 year to arsenic during construction activities involving the disturbance of impacted-soils. However, it is unlikely construction workers would be working at the Site continuously for 1 year. Furthermore, this risk could be easily mitigated with proper communication to future construction workers requiring they wear appropriate Personal Protective Equipment (PPE) and follow proper decontamination procedures subsequent to working in order to avoid exposure and health risks. The procedures documenting proper communication, appropriate PPE, and proper decontamination could be documented in a CMMP with or without DEQ approval.

3. The generic occupational RBC for lead and dieldrin under the *leaching to groundwater exposure pathway* conservatively assumes that a water supply well is being used at the Site or proximal to it, and that these constituents could be leached from the shallow soil, impact groundwater, and that occupational receptors could subsequently be exposed to these constituents in drinking water. The Site is currently undeveloped vacant land with no current water use. When developed, the Site will be serviced with municipal water by Medford Water. The neighboring properties are either undeveloped land with no water use or have commercial/industrial use and utilize private well water and/or municipal water and will likely continue to utilize private well water and/or municipal water in the future. A review of the WRD well records indicates the Site has no water supply wells. Based on the general topography in the vicinity of the Site, it is expected that groundwater at the Site flows to the west-northwest towards the unnamed creek (tributary of Upton Slough) that flows through the northern and northwestern portion of TL 900. Given the current groundwater use status at the Site (i.e. the absence of wells, no current water use, and the future planned municipal water use), it is highly unlikely potentially leached lead and dieldrin from the shallow soil into groundwater at the Site will pose an unacceptable risk to occupational receptors at the Site. To completely eliminate the potential risk that leaching of these constituents to groundwater might pose to occupational receptors at the Site, a groundwater investigation could be conducted and/or a deed notice could be developed and applied that prohibits the installation of wells to supply water to occupational receptors at the Site. It should also be noted the concentrations of lead and dieldrin attenuate to concentrations below their respective generic RBCs for the *leaching to groundwater exposure pathway* for occupational receptors (and naturally occurring background concentrations for lead) at depths below 1.0 feet bgs and 0.5 feet bgs, respectively. These data indicate that if the upper 1.0 foot of soil is removed during development to meet geotechnical requirements, this potential risk is eliminated.

4. The Clean Fill Values (and naturally occurring background concentrations for metals) were exceeded by several constituents in the composite samples collected throughout the Site at a depth ranging from 0.0 to 3.0 feet bgs. These constituents included arsenic, lead,

4,4'-DDE, 4,4'-DDT, and dieldrin. If soil from 1.0 to 3.0 feet bgs is excavated throughout the Site, it can be reused on the Site as unrestricted fill. However, if this soil is exported off of the Site, it should be managed appropriately to ensure it does not adversely impact ecological receptors. For example, this soil could be properly disposed of at a quarry under a DEQ-approved Solid Waste Letter of Authorization (SWLA). It should be noted the soil at a depth of 0.0 to 1.0 feet bgs should be addressed as described under bullet #1 to address potential arsenic risks for occupational receptors under the *soil ingestion, dermal contact, and inhalation exposure pathway*.

Based on the data collected during the Phase II ESA, AEC concluded that the historical orchard practices at the Site involving pesticides have adversely impacted the surficial soil and are considered a REC. The available data reflect the adverse impacts are in the soil within the investigated interval of 0.0 to 3.0 feet bgs. AEC recommended that during development activities, the potential risks associated with residual pesticides concentrations in shallow soil that are above generic RBCs and/or Clean Fill values should be managed appropriately. If this soil is to be excavated during development and moved off of the Site, the soil should be disposed of consistent with DEQ regulations, examples being disposal under a DEQ-approved SWLA or disposal at an approved landfill (e.g. Dry Creek Landfill).

Furthermore, AEC recommended a Supplemental Phase II ESA be conducted to investigate the soil beneath 3 feet bgs. The reported concentration of 4,4'-DDE in the Phase II ESA investigation exceeded the Clean Fill Value in the deepest composite soil sample collected from 2.0 to 3.0 feet bgs. The planned work for the new pump station's treatment tank will involve soil excavation at depths greater than 3.0 feet bgs. Therefore, AEC recommended the soil below 3.0 feet bgs be investigated to determine if 4,4'-DDE is present at concentrations above the Clean Fill Values or if the soil qualifies as unrestricted clean fill and can be used with no environmental restrictions.

In addition, AEC also recommended the Supplemental Phase II ESA include the Toxicity Characteristic Leachate Procedure (TCLP) test for lead in the upper 1 foot of soil. The Phase II ESA reported an average lead concentration in the upper 1 foot of soil of 172 milligrams per kilogram (mg/kg). If this soil is planned to be excavated and exported to a quarry under a DEQ-approved SWLA, DEQ will typically request a TCLP test for lead to determine if the lead will leach out at concentrations that will qualify it as hazardous waste. DEQ requests the TCLP analysis when the lead concentrations in soil are greater than 100 mg/kg.

The Supplemental Phase II ESA was conducted on July 30, 2025. The subsurface investigation included the excavation of eight test pits (TP11 through TP18) within the footprint of the proposed reservoir. The objective was to collect four depth-discrete soil samples from each test pit from four depth intervals, specifically from 0.0 to 1.0 feet bgs, 3.0 to 4.0 feet bgs, 4.0 to 5.0 feet bgs, and 5.0 to 6.0 feet bgs. Nevertheless, the bedrock, identified as sandstone, was encountered in all test pits at various depths starting from approximately 3 feet bgs. Therefore, discrete samples were obtained from each test pit from the accessible depth. The discrete samples from all eight test pits from the same depth interval were homogenized into four depth discrete composite samples. These were labeled as Foothill-0.0-1.0 (it contains subsamples from all eight test pits), Foothill-3.0-4.0 (it contains subsamples from TP12 through TP14 and from

TP16 through TP18), Foothil-4.0-5.0 (it contains subsamples from TP13, TP14, and TP16), and Foothill-5.0-6.0 (it contains soil from TP13).

The three soil samples collected from 3.0 to 6.0 feet bgs were submitted for laboratory analyses of organochlorine pesticides, specifically for 4,4'-DDE. The reported concentrations were compared to the DEQ's relevant generic RBCs for occupational receptors, construction workers, and excavation workers and also to the Clean Fill Values listed in DEQ's *Clean Fill Determinations* Internal Management Directive dated February 21, 2019 (DEQ, 2019). The reported concentrations of 4,4'-DDE were below the applicable RBCs and Clean Fill Value. Therefore, AEC concluded that any soil and rock that will be excavated at depths greater than 3.0 feet bgs qualifies as unrestricted clean fill and can be used with no environmental restrictions.

The composite soil sample collected from 0.0 to 1.0 feet bgs was submitted for a TCLP test for lead. The results were "non-detect" for lead using the TCLP test. Therefore, DEQ should not have any limitations regarding the hauling of the upper foot of soil and placing it in a quarry under a DEQ-approved SWLA permit.

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LIST OF ACRONYMS AND ABBREVIATIONS

AEC	Alpine Environmental Consultants, LLC
bgs	below ground surface
CMMP	Contaminated Media Management Plan
4,4'-DDE	4,4'-Dichlorodiphenyldichloroethene
4,4'-DDT	4,4'-Dichlorodiphenyltrichloroethane
DEQ	Department of Environmental Quality
ESA	Environmental Site Assessment
ICP-MS	Inductively Coupled Plasma Mass Spectrometry
ISM	Incremental Sampling Methodology
ITRC	Interstate Technology Regulatory Council
mg/kg	milligrams per kilogram
mg/L	milligrams per liter
µg/L	microgram per liter
MRL	method reporting limit
NFA	no further action
PPE	personal protective equipment
ppm	parts per million
RBC	risk-based concentrations
REC	recognized environmental condition
SWLA	Solid Waste Letter of Authorization
TCLP	Toxicity Characteristic Leaching Procedure
TL	tax lot
USEPA	United States Environmental Protection Agency
VCP	Voluntary Cleanup Pathway
WRD	Water Resources Department

1 INTRODUCTION

Medford Water retained Alpine Environmental Consultants, LLC (AEC) to prepare this report presenting the findings of the Supplemental Phase II Environmental Site Assessment (ESA) conducted at the property identified as an approximately 6.37-acre portion of Map 371W09 and tax lot (TL) 900 located in Medford, Oregon (the Site). The Phase II ESA involved a soil investigation.

1.1 Site Description

The Site is located on the southeast portion of TL 900 located in Township 37 South, Range 1 West, Section 9 (Map 371W09). The Site occupies approximately 6.37 acres and consists of undeveloped grassy land. The location of the Site is shown on **Figure 1**,**Figure 2**, and **Figure 3**.

The topography of the Site and the neighboring properties has a slight gradient towards the north and west. An unnamed creek, a tributary of Upton Slough, flows through the northern and northwestern portions of TL 900 in an approximately westerly direction. Based on the general topography in the vicinity of the Site, it is assumed that groundwater at the Site flows to the west-northwest towards this unnamed creek.

The Site is located outside of the City of Medford city limits, outside the Urban Growth Boundaries, and within the Urban Reserve Boundaries. According to the Jackson County zoning map, the Site is located in an exclusive farm use (EFU) zoning area. According to the Jackson County and City of Medford zoning maps, the neighboring properties are located in EFU and rural residential zoning districts.

1.2 Site Background

AEC completed a Phase I ESA for the Site in February 2025 (AEC, February 2025). According to the historical aerial photographs, the Site had been historically occupied by orchards from at least the late 1930s through approximately 2010. The Phase I ESA concluded that the potential impacts from pesticides to shallow soil associated with historical orchard use constitute a Recognized Environmental Condition (REC). Given the identified REC, AEC recommended a Phase II ESA be conducted at the Site to determine if soil at the Site had been adversely impacted.

AEC conducted the Phase II ESA in April 2025 and the results are documented in the Phase II ESA Report dated June 7, 2025 (AEC, June 2025). The subsurface investigation included the excavation of 10 test pits (TP1 through TP10) and the collection of five depth-discrete soil samples from each test pit from five depth intervals, specifically from 0.0 to 0.5 feet below ground surface (bgs), 0.5 to 1.0 feet bgs, 1.0 to 1.5 feet bgs, 1.5 to 2.0 feet bgs, and 2.0 to 3.0 feet bgs. The discrete samples from all test pits from the same depth interval were homogenized into five depth discrete

composite samples, namely COMP-0.0-0.5, COMP-0.5-1.0, COMP-1.0-1.5, COMP-1.5-2.0, and COMP-2.0-3.0.

The soil samples were submitted for laboratory analyses of orchard-related contaminants, specifically total metals (antimony, arsenic, barium, beryllium, cadmium, chromium, cobalt, copper, lead, nickel, mercury, molybdenum, selenium, silver, thallium, vanadium, and zinc), organochlorine pesticides, organophosphorus pesticides, and chlorinated herbicides. The reported concentrations were compared to the relevant generic risk-based concentrations (RBCs) developed by the Oregon Department of Environmental Quality (DEQ). The generic RBCs applicable to the Site are consistent with the planned commercial land use and assume occupational receptors, construction workers, and excavation workers will be present at the Site. The reported concentrations of metals were also compared to the naturally occurring background concentrations developed for the Cascade Mountains region of Oregon, which includes the eastern part of the Medford area and the Site. All reported concentrations were also compared to the Clean Fill Values listed in DEQ's *Clean Fill Determinations* Internal Management Directive dated February 21, 2019 (DEQ, 2019). Note that the Clean Fill Values for metals coincides with the naturally occurring background concentrations.

The Phase II ESA analytical data reported several constituents in soil samples at concentrations above the laboratory method reporting limits (MRLs). Overall, the analytical results reported in general a higher concentration of metals and pesticides constituents in the upper 0.5 feet of soil than in the underlying layer from 0.5 to 3.0 feet bgs. These data demonstrate concentrations of pesticides constituents attenuate fairly rapidly with depth.

The reported concentrations of several metals and organochlorine pesticides exceeded the RBCs/or the Clean Fill Values. These exceedances included the following:

- The concentrations of arsenic in soil from 0.0 to 3.0 feet bgs exceeded the generic RBC for the *ingestion, dermal contact, and inhalation exposure pathway* for occupational receptors but only the concentrations of arsenic in soil from 0.0 to 1.0 feet bgs exceeded the naturally occurring background concentration in the Cascade Mountains region.
- The concentrations of arsenic in soil from 0.0 to 1.0 feet bgs also exceeded the generic RBC for the *ingestion, dermal contact, and inhalation exposure pathway* for construction workers.
- The concentrations of lead in soil from 0.0 to 1.0 and 1.5 to 2.0 feet bgs and the concentration of dieldrin in soil from 0.0 to 0.5 feet bgs exceeded the generic RBC for the *leaching to groundwater exposure pathway* for occupational receptors.
- The concentrations of lead in soil from 0.0 to 1.0 feet bgs exceeded the naturally occurring background concentration.
- The concentrations of 4,4'-dichlorodiphenyldichloroethene (4,4'-DDE), 4,4'-dichlorodiphenyltrichloroethane (4,4'-DDT), and dieldrin reported in soil at various depths down to 3 feet bgs exceeded DEQ's Clean Fill Values.

While generic RBCs for occupational receptors and construction workers were exceeded for the aforementioned constituents and exposure pathways, potential risks to human health associated with these constituents and exposure pathways can be managed, mitigated, and/or eliminated from further concern, as follows:

1. The generic occupational RBC under the *soil ingestion, dermal contact, and inhalation exposure pathway* assumes occupational receptors are likely to come into contact with contaminated soils found in the upper 3 feet of soil. The concentrations of arsenic reported in the composite soil samples collected from depths of 0.0 to 3.0 feet bgs exceeded this RBC. However, arsenic exceeded the naturally occurring background concentration only in the composite soil samples collected from 0.0 to 1.0 feet bgs. Prior to property development, if the upper 1.0 feet of soil is not excavated and properly disposed of off of the Site during development, AEC recommends institutional and/or engineering controls be implemented throughout the Site. Institutional and/or engineering control options to protect occupational receptors include but are not limited to the following: removal of shallow soil (at least from 0.0 to 1.0 feet bgs); paving; covering the property with a 3-foot layer of clean compacted fill material; additional investigations to delineate arsenic concentrations in shallow soil; developing an asphalt cap maintenance plan; developing a Contaminated Media Management Plan (CMMP) with or without DEQ approval; and/or applying a deed notice (e.g. to ensure the asphalt cap is maintained). Another option for consideration is preparation of a Site-specific human health risk assessment to account for the relatively minimal amount of time future workers will be present at the Site.

2. The generic construction workers RBC for total arsenic under the *soil ingestion, dermal contact, and inhalation exposure pathway* assumes construction workers could be exposed over 1 year to arsenic during construction activities involving the disturbance of impacted-soils. However, it is unlikely construction workers would be working at the Site continuously for 1 year. Furthermore, this risk could be easily mitigated with proper communication to future construction workers requiring they wear appropriate Personal Protective Equipment (PPE) and follow proper decontamination procedures subsequent to working in order to avoid exposure and health risks. The procedures documenting proper communication, appropriate PPE, and proper decontamination could be documented in a CMMP with or without DEQ approval.

3. The generic occupational RBC for lead and dieldrin under the *leaching to groundwater exposure pathway* conservatively assumes that a water supply well is being used at the Site or proximal to it, and that these constituents could be leached from the shallow soil, impact groundwater, and that occupational receptors could subsequently be exposed to these constituents in drinking water. The Site is currently undeveloped vacant land with no current water use. When developed, the Site will be serviced with municipal water by Medford Water. The neighboring properties are either undeveloped land with no water use or have commercial/industrial use and utilize private well water and/or municipal water and will likely continue to utilize private well water and/or municipal water in the future. A review of the WRD well records indicates the Site has no water supply wells. Based on the general topography in the vicinity of the Site, it is expected that groundwater at the Site flows to the west-northwest towards the unnamed creek (tributary of Upton Slough) that flows through the northern and northwestern portion of TL 900. Given the

current groundwater use status at the Site (i.e. the absence of wells, no current water use, and the future planned municipal water use), it is highly unlikely potentially leached lead and dieldrin from the shallow soil into groundwater at the Site will pose an unacceptable risk to occupational receptors at the Site. To completely eliminate the potential risk that leaching of these constituents to groundwater might pose to occupational receptors at the Site, a groundwater investigation could be conducted and/or a deed notice could be developed and applied that prohibits the installation of wells to supply water to occupational receptors at the Site. It should also be noted the concentrations of lead and dieldrin attenuate to concentrations below their respective generic RBCs for the *leaching to groundwater exposure pathway* for occupational receptors (and naturally occurring background concentrations for lead) at depths below 1.0 feet bgs and 0.5 feet bgs, respectively. These data indicate that if the upper 1.0 foot of soil is removed during development to meet geotechnical requirements, this potential risk is eliminated.

4. The Clean Fill Values (and naturally occurring background concentrations for metals) were exceeded by several constituents in the composite samples collected throughout the Site at a depth ranging from 0.0 to 3.0 feet bgs. These constituents included arsenic, lead, 4,4'DDE, 4,4'-DDT, and dieldrin. If soil from 1.0 to 3.0 feet bgs is excavated throughout the Site, it can be reused on the Site as unrestricted fill. However, if this soil is exported off of the Site, it should be managed appropriately to ensure it does not adversely impact ecological receptors. For example, this soil could be properly disposed of at a quarry under a DEQ-approved Solid Waste Letter of Authorization (SWLA). It should be noted the soil at a depth of 0.0 to 1.0 feet bgs should be addressed as described under bullet #1 to address potential arsenic risks for occupational receptors under the *soil ingestion, dermal contact, and inhalation exposure pathway*.

Based on the data collected during the Phase II ESA, AEC concluded that the historical orchard practices at the Site involving pesticides have adversely impacted the surficial soil and are considered a REC. The available data reflect the adverse impacts are in the soil within the investigated interval of 0.0 to 3.0 feet bgs. AEC recommended that during development activities, the potential risks associated with residual pesticides concentrations in shallow soil that are above generic RBCs and/or Clean Fill values should be managed appropriately. If this soil is to be excavated during development and moved off of the Site, the soil should be disposed of consistent with DEQ regulations, examples being disposal under a DEQ-approved SWLA or disposal at an approved landfill (e.g. Dry Creek Landfill).

Furthermore, AEC recommended a Supplemental Phase II ESA be conducted to investigate the soil beneath 3 feet bgs. The reported concentration of 4,4'-DDE in the Phase II ESA investigation exceeded the Clean Fill Value in the deepest composite soil sample collected from 2.0 to 3.0 feet bgs. The planned work for the reservoir storage tank will involve soil excavation at depths greater than 3.0 feet bgs. Therefore, AEC recommended the soil below 3.0 feet bgs be investigated to determine if 4,4'-DDE is present at concentrations above the Clean Fill Values or if the soil qualifies as unrestricted clean fill and can be used with no environmental restrictions.

In addition, AEC also recommended that the Supplemental Phase II ESA include the Toxicity Characteristic Leachate Procedure (TCLP) test for lead in the upper 1 foot of soil. The Phase II ESA reported an average lead concentration in the upper 1 foot of soil of 172 milligrams per kilogram (mg/kg). If this soil is planned to be excavated and exported to a quarry under a DEQ-approved SWLA, DEQ will request a TCLP test for lead to determine if the lead will leach out at concentrations that will qualify it as hazardous waste. DEQ typically requests the TCLP analysis when the lead concentrations in soil are greater than 100 mg/kg.

1.3 **Objectives**

The objectives of this Supplemental Phase II ESA were the following:

- To collect a technically appropriate dataset representative of current conditions to determine if 4,4'-DDE in soil below 3 feet bgs at the Site associated with historical orchard uses is present at concentrations above the Clean Fill Values or if the soil qualifies as unrestricted clean fill and can be used with no environmental restrictions.
- To collect a technically appropriate dataset representative of current conditions to run the TCLP test for lead in the upper 1 foot of soil in order to determine at what concentrations lead will leach out. If TCLP test demonstrates that lead could leach out at concentrations that will qualify it as hazardous waste, the upper 1 foot of soil that will be excavated from the Site could only be disposed of at a Subtitle C Hazardous Waste Landfill (e.g. Arlington Landfill).

The Supplemental Phase II ESA included a soil investigation. The Phase II ESA investigation process is presented in **Section 2**, data evaluation is presented in **Section 3**, and conclusions and recommendations are presented in **Section 4**.

2 SUPPLEMENTAL PHASE II ESA INVESTIGATION

The Supplemental Phase II ESA included a subsurface investigation, specifically soil sampling. The subsurface investigation was conducted on July 30, 2025, and a summary of the field methods and observations is presented in **Section 2.1** and **Section 2.2**. The analytical results of the soil samples and their interpretation are included in **Section 3**. Conclusions and recommendations are presented in **Section 4**. The photographic documentation is included in **Appendix 1**. The complete laboratory results are included in **Appendix 2**. The location of the Site is shown on **Figure 1**, a reservoir tank design schematic is illustrated on **Figure 2**, and the test pit locations are shown on **Figure 3**. The analytical results of the Phase II ESA and Supplemental Phase II Esa are summarized in **Table 1** through **Table 5**.

2.1 Pre-Excavation

AEC contacted the Utility Notification Center in order to locate and trace any potential public underground utilities prior to completing any subsurface investigation activities.

2.2 Soil Investigations

2.2.1 Test Pit Excavation and Soil Sampling

AEC supervised the excavation of eight test pits on the Site. The test pits were identified as TP11 through TP18. Note that test pits TP1 through TP10 were excavated at the Site as part of the Phase II ESA conducted in April 2025. The eight test pit locations are illustrated on **Figure 3** and the photographic documentation is included in **Appendix 1**. The test pits were excavated using a small excavator owned and operated by Three Dimensional Contracting, LLC of Merlin, Oregon. Soil samples and lithologic characterization, were logged by Mr. Toby Shallcross (Project Geologist) and checked by Mr. Jonathan Williams (Oregon Registered Geologist) of AEC.

The sampling objective at each test pit was to collect four depth-discrete soil samples from each test pit from four depth intervals, specifically from 0.0 to 1.0 feet bgs, 3.0 to 4.0 feet bgs, 4.0 to 5.0 feet bgs, and 5.0 to 6.0 feet bgs. No non-native fill was observed in any of the test pits. The bedrock, identified as medium brown-yellowish sandstone, was encountered in all test pits at various depths starting at approximately 3.0 feet bgs. Therefore, the eight test pits could not be excavated to the planned depth of 6.0 feet bgs. The approximate final depths were as follows: 3.0 feet bgs (TP11 and TP15), 4.0 feet bgs (TP17 and TP18), 4.5 feet bgs (TP12), 5.0 feet bgs (TP 16), and 5.75 feet bgs (TP13). Therefore, discrete samples were obtained from each test pit from the accessible depth. The collected discrete samples from all eight test pits from the same depth interval were homogenized into four depth discrete composite samples. These were labeled identified as follows:

- Foothill-0.0-1.0: this sample contains subsamples from all eight test pits collected from 0.0 to 1.0 feet bgs;

- Foothill-3.0-4.0: this sample contains subsamples from test pits TP12 through TP14 and from test pits TP16 through TP18 collected from 3.0 to 4.0 feet bgs;
- Foothil-4.0-5.0: this sample contains subsamples from test pits TP13, TP14, and TP16 collected from 4.0 to 5.0 feet bgs; and
- Foothill-5.0-6.0: this sample contains soil from test pit TP13 collected from 5.0 to 5.75 feet bgs.

The lithology identified in the eight test pits consisted of medium to dark brown clayey soil to approximately 3.0 to 5.75 feet bgs, underlain by medium brown-yellowish sandstone. The sandstone is likely the Payne Cliffs Formation, an arkosic sandstone. No groundwater was encountered in the test pits.

The rationale for collecting soil subsamples at each test pit location was that depth discrete analytical results should help characterize the vertical extent and attenuation with depth of potential impacts by pesticide constituents. The concept of depth discrete samples is also documented in DEQ's *Guidance for Evaluating Residual Pesticides on Lands Formerly Used for Agricultural Production* of 2006 that was updated in June 2019 (DEQ, June 2019).

After the test pits had been excavated, AEC personnel collected the depth discrete soil samples over the desired depth intervals from each test pit using clean stainless-steel trowels and plastic bags. Before and between the excavation of each test pit, the small excavator bucket was swept clean with a broom. The stainless-steel trowels were also cleansed prior to each use by scrubbing with a brush and an Alconox solution and rinsed with de-ionized water.

Soil samples representative of the native soil from several depth intervals were collected at each test pit by scraping an equal and representative volume of soil off of the test pit walls over the desired depth intervals to fill plastic labeled Ziploc bags. The soil in the plastic Ziploc bags was then thoroughly homogenized using hands with clean nitrile gloves to develop representative depth discrete soil subsamples. Larger sized material (i.e., gravel greater than approximately ¼ to ½ inch in diameter) was removed by hand. Accordingly, a total of four depth discrete soil subsamples were collected. After soil sample collection was completed, the test pits were backfilled and compacted using the small excavator as described above.

Once all the soil subsamples were collected, the composite samples were created placing an equal volume of soil from the subsamples collected from the same depth interval into glass sample containers provided by the laboratory. Preparation of the composite samples was completed by the analytical laboratory using methods consistent with the Incremental Sampling Methodology (ISM) developed by the Interstate Technology Regulatory Council (ITRC).

2.2.2 Soil Laboratory Analyses

The composite soil samples were placed in an iced cooler and submitted to Apex Laboratories, LLC (Apex) of Tigard, Oregon, under standard chain-of-custody protocol. The temperature of the cooler recorded by the laboratory upon receipt was 0.6 °C, which is within the U.S. Environmental Protection Agency's (USEPA's) recommended limit (which is specifically less than or equal to 6°C

and above the freezing point). After completing compositing of the soil samples using ISM, the soil samples were analyzed for the following constituents:

- Organochlorine pesticides, specifically 4,4'-DDE, by USEPA Method 8081B (composite samples Foothill-3.0-4.0, Foothill-4.0-5.0, and Foothill-5.0-6.0) and
- TCLP for lead using USEPA SW-846 Method 1311 (soil sample Foothill-0.0-1.0).

Copies of the final analytical laboratory reports for the Site analytical soil results are included in **Appendix 2**. The Phase II ESA analytical results for soil samples are summarized in **Table 1** through **Table 4.** The Supplemental Phase II ESA results are included in **Table 2** and **Table 5**.

3 DATA EVALUATION

The Supplemental Phase II ESA complete analytical results are included in **Appendix 2**. The Phase II ESA analytical results are summarized in **Table 1** through **Table 4.** The Supplemental Phase II ESA analytical results are included in **Appendix 2** and summarized in **Table 2** (4,4'-DDE) and **Table 5** (TCLP lead).

The reported constituents were compared to DEQ's relevant generic RBCs. The generic RBCs identified in the results tables are consistent with the anticipated future land use and zoning and assume occupational receptors and construction and excavation workers will be present on the Site. The generic RBCs are described in DEQ's updated *Risk-Based Decision Making for the Remediation of Contaminated Sites* guidance dated October, 2, 2017 (DEQ, 2017).

The DEQ's relevant generic RBCs address the following receptors and exposure pathways: the occupational receptors, construction workers, and excavation workers *ingestion, dermal contact, and inhalation exposure pathway*; the occupational receptors *volatilization to outdoor air exposure pathway*; the occupational receptors *vapor intrusion into buildings exposure pathway*; and the occupational receptors *leaching to groundwater exposure pathway*.

The reported concentrations of total metals were also compared to the naturally occurring background concentrations developed for the Cascade Mountains region, which includes the eastern Medford area and the Site. The background concentrations are derived from DEQ's Technical Report entitled Development of Oregon Background Metals Concentrations in Soil (DEQ, 2013). The background concentrations are a type of average defined as the 95 percent upper predictive limits.

The reported concentrations of constituents were also compared to the Clean Fill Values listed in the DEQ's Clean Fill Determinations Internal Management Directive dated February 21, 2019 (DEQ, February 2019). Note that the Clean Fill Values for metals equal the naturally occurring background concentrations.

The results of the TCLP test for lead were compared to the USEPA's maximum non-hazardous waste disposal limit.

The reported data of the Supplemental Phase II ESA re summarized in the following paragraphs.

3.1 Organochlorine Pesticides

The Supplemental Phase II ESA analytical results of composite soil samples reported 4,4'-DDE at concentrations above the laboratory MRLs in samples Foothill-3.0-4.0 and Foothill-5.0-6.0.

However, the reported concentrations were below any generic applicable RBCs and below the Clean Fill Values. The organochlorine pesticides results are summarized in **Table 2**.

Based on the analytical results of all soil samples collected throughout the Site during the Phase II ESA and Supplemental Phase II ESA, the soil at the Site within the upper 3.0 feet does not qualify as Clean Fill. The constituents reported at concentrations above the Clean Fill Values include the following:

- Arsenic - from 0.0 to 1.0 feet bgs;
- Lead - from 0.0 to 1.0 feet bgs;
- 4,4'-DDE - from 0.0 to 3.0 feet bgs;
- 4,4'-DDT - from 0.0 to 1.0 feet bgs; and
- Dieldrin - from 0.0 to 1.0 feet bgs.

Based on the findings of the Phase II ESA and the Supplemental Phase II ESA, the following soil management recommendations are made:

- Due to the fact that arsenic was reported at concentrations above the naturally occurring background concentration in the soil samples collected from 0.0 to 1.0 feet bgs, soil within the upper 1.0 foot has to be addressed, either through excavation/removal or through institutional and/or engineering controls. Prior to property development, the upper 1.0 feet of soil can be excavated and properly disposed of off of the Site. If this is not a desired approach, AEC recommends institutional and/or engineering controls be implemented throughout the Site. Institutional and/or engineering control options to protect occupational receptors include but are not limited to the following: removal of shallow soil (at least from 0.0 to 1.0 feet bgs); paving; covering the property with a 3-foot layer of clean compacted fill material; additional investigations to delineate arsenic concentrations in shallow soil; developing an asphalt cap maintenance plan; developing a Contaminated Media Management Plan (CMMP) with or without DEQ approval; preparing a Site-specific human health risk assessment; and/or applying a deed notice (e.g. to ensure the asphalt cap is maintained).
- Soil within the 1.0 to 3.0 feet bgs at the Site should not be exported off of the Site unless it is managed appropriately (e.g. under a DEQ-approved SWLA).
- Soil from 1.0 to 3.0 feet bgs can be reused on the Site as fill.
- Soil between 3.0 and 6.0 feet bgs and native bedrock qualifies as unrestricted clean fill and can be used with no environmental restrictions.
- It should be noted that per the *Clean Fill Determinations* Internal Management Directive (DEQ, 2019), any soil with petroleum-like staining or a petroleum-like odor does not qualify as Clean Fill and should not be exported from the Site unless it is properly handled (e.g. under a DEQ-approved SWLA).

3.2 TCLP Test for Lead

For lead concentrations in soil over 100 mg/kg, DEQ typically requires a TCLP test prior to soil disposal to determine if lead will leach out at concentrations that will qualify the soil as hazardous

waste. The USEPA TCLP hazardous waste determination limit is 5 milligram per liter (mg/L). The laboratory TCLP test reported a leached lead concentration of less than the laboratory MRL of 0.05 mg/L or "non-detect." Therefore, DEQ should not have any concerns regarding the hauling of the upper foot of soil from the Site and placing it in a quarry under a DEQ-approved SWLA permit.

4 CONCLUSIONS AND RECOMMENDATIONS

The Supplemental Phase II ESA investigation conducted at the Site included the following tasks:

- The excavation of 8 test pits identified as TP11 through TP18;
- The collection of subsamples from each test pit from four depth discrete intervals specifically from 0.0 to 1.0 feet bgs, 3.0 to 4.0 feet bgs, 4.0 to 5.0 feet bgs, and 5.0 to 6.0 feet bgs (depending on the bedrock presence);
- The preparation of four depth discrete composite soil samples, identified as Foothill-0.0-1.0, Foothill-3.0-4.0, Foothill-4.0-5.0, and Foothill-5.0-6.0; and
- The laboratory analyses of composite soil samples Foothill-3.0-4.0, Foothill-4.0-5.0, and Foothill-5.0-6.0 for organochlorine pesticides, specifically for 4,4'-DDE, by USEPA Method 8081B; and
- The laboratory analyses of composite soil sample Foothill-0.0-1.0 for TCLP for lead by USEPA Method 1311/6020B Inductively Coupled Plasma Mass Spectrometry (ICP-MS).

The organochlorine pesticides analytical data reported 4,4'-DDE at concentrations below any generic applicable RBCs and below the Clean Fill Values; therefore, it was concluded that soil between 3.0 and 6.0 feet bgs qualifies as unrestricted clean fill and can be used with no environmental restrictions. The TCLP analytical data reported a leached lead concentration of less than the laboratory MRL of 0.05 mg/L and less than hazardous waste determination limit of 5 mg/L; therefore, DEQ should not have any concerns regarding the hauling of the upper 1 foot of soil from the Site and placing it in a quarry under a DEQ-approved SWLA permit.

Based on the available data obtained as part of the Phase II ESA and Supplemental Phase II ESA, AEC concluded that the historical orchard practices at the Site involving pesticides have adversely impacted the surficial soil and are considered a REC. The available data reflect the adverse impacts are in the soil within the interval of 0.0 to 3.0 feet bgs.

Based on these findings and accounting for the inherent uncertainties associated with any subsurface investigation, AEC recommends the following:

- Consider entering DEQ's VCP to obtain a No Further Action (NFA) determination, which will concurrently ensure future occupants are not exposed to unacceptable risks associated with residual pesticides contamination and provide the property owner and associated business entities with liability protection.
- Consider investigating the groundwater and/or developing and applying a deed notice that prohibits the installation of wells to supply water to occupational receptors at the Site.
- During development activities, appropriately manage potential risks associated with residual pesticides concentrations in shallow soil that are above generic RBCs (e.g. arsenic) and/or Clean Fill values in the upper 3.0 feet of soil of the Site. If this soil is to be

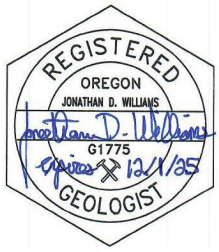
excavated during development and moved off of the Site, the soil should be disposed of consistent with DEQ regulations, examples being disposal under a DEQ-approved SWLA or disposal at an approved landfill (e.g. Dry Creek Landfill).

Please feel free to contact Jonathan Williams at 541-944-4685 or jwilliams@alpine-env-llc.com if you have any questions about this Phase II ESA report.

Sincerely,

Alpine Environmental Consultants, LLC

Jonathan D. Williams, R.G.
Senior Hydrogeologist



Antonela Vadan, R.G.
Project Geologist

5 REFERENCES

Alpine Environmental Consultants, LLC (AEC). February 19, 2025. *Phase I Environmental Site Assessment*. (AEC, February 2025).

AEC. June 7, 2025. *Phase II Environmental Site Assessment Report*. (AEC, June 2025).

Oregon Department of Environmental Quality (DEQ). March 2013. *Development of Oregon Background Metals Concentrations in Soil*, Technical report. Land Quality Division, Cleanup Program. (DEQ, 2013).

Oregon DEQ. October 2017. *Risk-Based Decision Making for the Remediation of Contaminated Sites*. Updated on October 17, 2017 (DEQ, 2017).

Oregon DEQ. June 2019. *Guidance for Evaluating Residual Pesticides on Lands Formerly Used for Agricultural Production*. Land Quality Division, Cleanup Program. Developed in January 2006 and Updated in June 2019 (DEQ, June 2019).

Oregon DEQ. February 21, 2019. Clean Fill Determinations. Materials Management Division. (DEQ, February 2019).

6 LIMITATIONS

The purpose of an environmental assessment is to reasonably evaluate the potential for or actual impact of past practices on a given Site area. In performing an environmental assessment, it is understood that a balance must be struck between a reasonable inquiry into the environmental issues and an exhaustive analysis of each conceivable issue of potential concern. This environmental assessment contains professional opinions as to the environmental issues of concern and/or additional actions, which may be addressed to the property. In rendering its professional opinion, we warrant that services provided hereunder were performed, within the limits described, consistent with current generally accepted environmental consulting principles and practices. No other warranty, express or implied, is made. The following paragraphs discuss the assumptions and parameters under which such an opinion is rendered.

No investigation is thorough enough to exclude the presence of hazardous materials at a given Site. If hazardous conditions have not been identified during the assessment, such a finding should not therefore be construed as a guarantee of the absence of such materials on the Site, but rather as the result of the services performed within the scope, limitations, and cost of the work performed.

Any opinions or recommendations presented apply to Site conditions existing when services were performed. We are unable to report on or accurately predict events that may change the Site conditions after the described services are performed, whether occurring naturally or caused by external forces. We assume no responsibility for conditions we were not authorized to investigate, or conditions not generally recognized as environmentally unacceptable when services were performed.

Environmental conditions may exist at the Site that cannot be identified by visual observation. Where the scope of services was limited to observations made during Site reconnaissance, interviews, review of readily available reports and literature or any combination, any conclusions or recommendations or both are necessarily based in part on information supplied by others, the accuracy or sufficiency of which we may not have independently reviewed.

Where subsurface work was performed, our professional opinions are based in part on interpretation of data from discrete sampling locations that may not represent actual conditions at unsampled locations.

Except where there is express concern of our client, or where specific environmental contaminants have been previously reported by others, naturally occurring toxic substances, potential environmental contaminants inside buildings, or contaminant concentrations that are not of current environmental concern may not be reflected in this document.

We are not responsible for any potential impact of changes in applicable environmental standards, practices, or regulations following performance of services, on the conclusions or recommendations, or both, of the study.

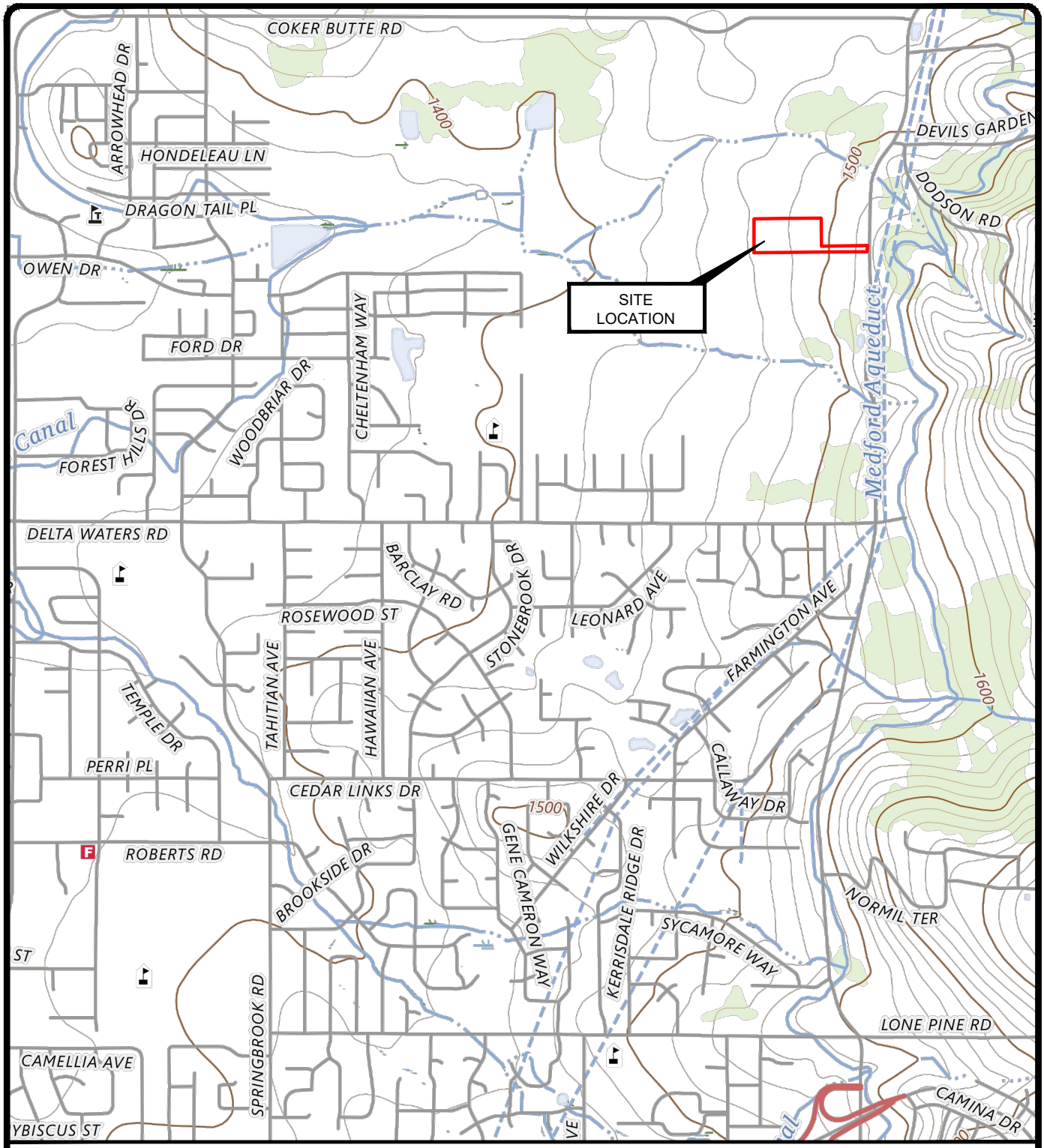
Services hereunder were performed consistent with our agreement and understanding with, and solely for the use of, our client. Opinions and recommendations are intended for the client, purpose, Site, location, time frame, and project parameters indicated. We are not responsible for subsequent separation, detachment, or partial use of this document. Any reliance on this report by a third party shall be at such party's sole risk.

7 QUALIFICATIONS OF ENVIRONMENTAL PROFESSIONALS

Mr. Jonathan Williams received a Bachelor of Science degree in Geology, with honors, from Duke University in 1987. He has over 30 years experience working with geologic and environmental reports, including Phase I ESAs. Mr. Williams has been a Registered Geologist in the State of Oregon since 1996, and has 40-hour HAZWOPER training.

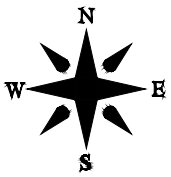
Ms. Antonela Vadan holds a Bachelor of Arts and Science in Earth and Environmental Sciences from the University of Illinois at Chicago. She has over 23 years of experience in both the private and public sector. Ms. Vadan has conducted multiple Phase I ESAs. Additional project activities have included risk assessments, remedial investigations/feasibility studies, soil and groundwater investigations, and indoor air quality investigations. Ms. Vadan is a Registered Geologist in the States of Oregon and Washington and has 40-hour HAZWOPER training.

FIGURES



SOURCE: U.S.G.S. 7.5 MINUTE TOPOGRAPHIC QUADRANGLE MEDFORD EAST, OR (2024)

SCALE FEET
0 1,500 3,000



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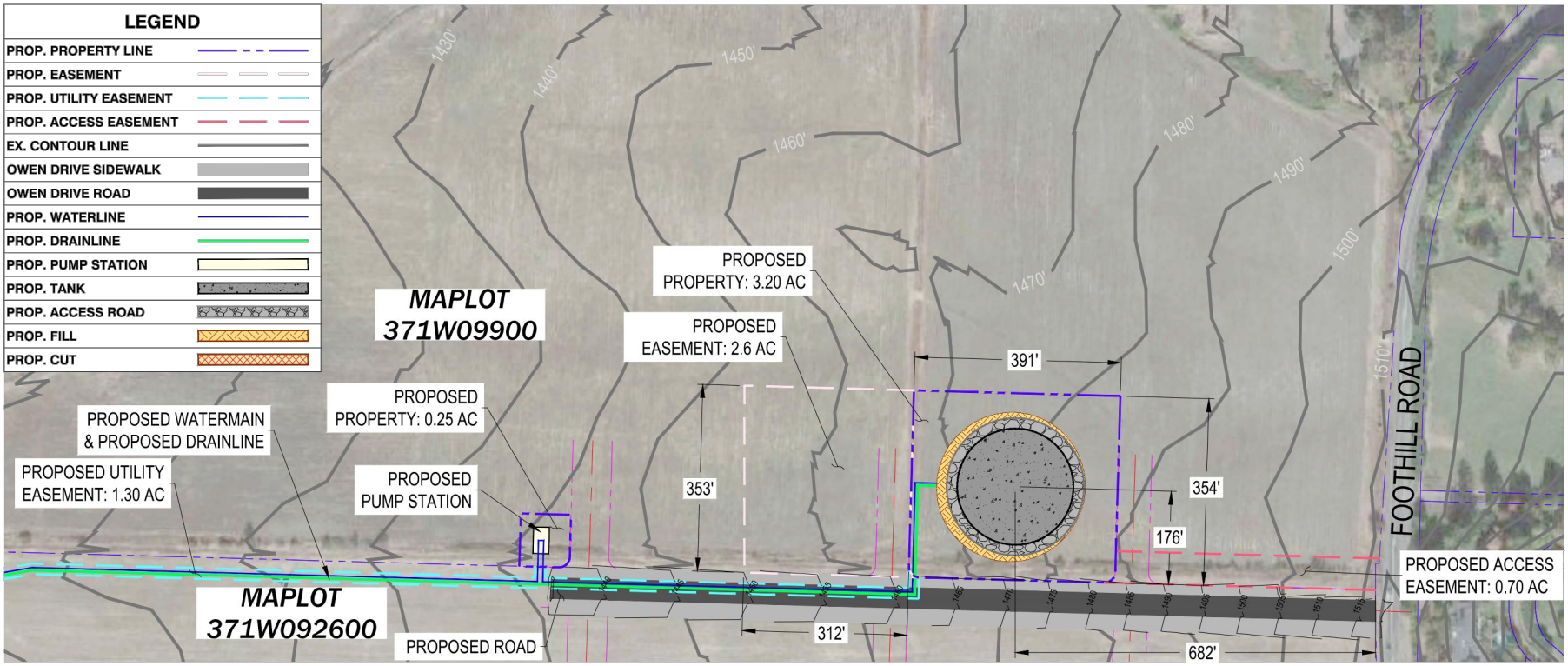
DATE: 10/16/25 DRAWN BY: SRM

Figure 1
Site Location Map
Supplemental Phase II ESA
6.37-Acre Portion of Map 371W09 TL 900
Medford, Oregon

f1_LocMap



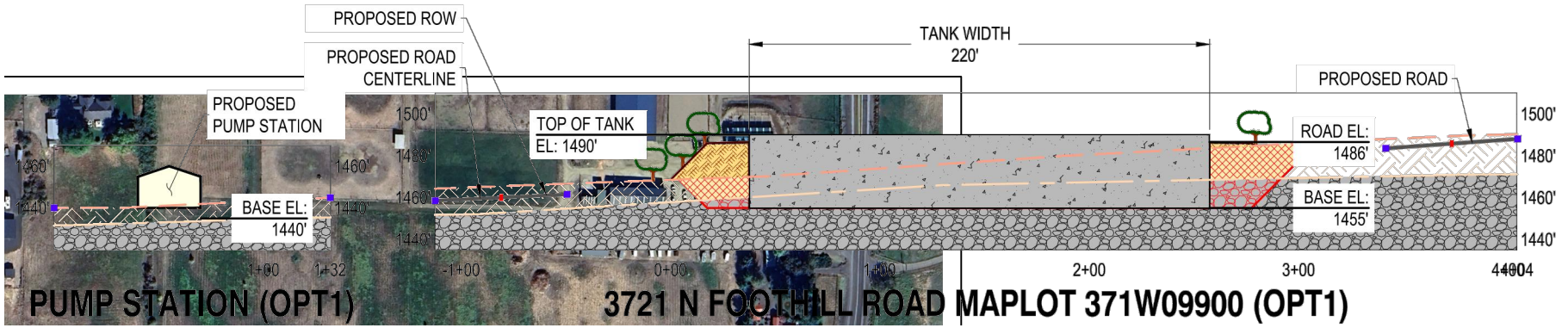


FIGURE SOURCE: RH2 Engineering, Inc., Project: Medford Water Commission - River Zone Reservoir Siting, Title: TL 900 W Tank Site 2023-07-07, Filename: NERPR-XC3D-FG-2023-06-22.dwg, Dated: 7-7-2023

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DATE: 10/16/25 | DRAWN BY: SRM

Figure 2
Tank Site Map
Supplemental Phase II ESA
6.37-Acre Portion of Map 371W09 TL 900
Medford, Oregon

f2_TankSiteDwg

SOURCE: GOOGLE EARTH (2024)

LEGEND

Approximate Site Boundary

TP11 × Test Pit Location - July 30, 2025

SCALE FEET

0 250 500

N W E S

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Figure 3
Test Pit Location Map
Supplemental Phase II ESA
6.37-Acre Portion of Map 371W09 TL 900
Medford, Oregon

f3_TestPitLoc

TABLES

Table 1. Soil Samples Analytical Results - Total Metals
Supplemental Phase II Environmental Site Assessment - 3721 N. Foothill Rd., Medford, OR; 6.37-Acre Portion of Map 371W09 TL 900

Parameter	DEQ Risk-Based Concentrations for Soil (a)					DEQ's Clean fill screening levels for Cascade Mountains and background metals in Soil (e), (f)	Test Pit Samples				
	Ingestion, Dermal Contact and Inhalation (b)			Volatilization to Outdoor Air (c)	Leaching to Groundwater (d)		COMP-0.0-0.5	COMP-0.5-1.0	COMP-1.0-1.5	COMP-1.5-2.0	COMP-2.0-3.0
							Composite soil samples of subsamples collected from test pits TP1 through TP10				
							0.0-0.5 ft bgs	0.5-1.0 ft bgs	1.0-1.5 ft bgs	1.5-2.0 ft bgs	2.0-3.0 ft bgs
	OCC.	C.W.	E.W.	OCC.	OCC.		04/10/25	04/10/25	04/10/25	04/10/25	04/10/25
Total Metals (mg/kg) USEPA 6020B (ICP-MS)											
Antimony	NE	NE	NE	NE	NE	0.67	1.10U, PRO	1.11U, PRO	1.12U, PRO	1.09U, PRO	1.08U, PRO
Arsenic	1.9	15	420	NV	*	19	**56.0 PRO**	**25.8 PRO**	**9.65 PRO**	**11.1 PRO**	**8.25 PRO**
Barium	220,000	69,000	>Max	NV	*	630	**199 PRO**	**213 PRO**	**223 PRO**	**220 PRO**	**238 PRO**
Beryllium	2,300	700	19,000	NV	*	2.1	**0.949 PRO**	**0.985 PRO**	**1.03 PRO**	**0.996 PRO**	**1.17 PRO**
Cadmium	1,100	350	9,700	NV	*	0.54	0.219U, PRO	0.222U, PRO	0.225U, PRO	0.217U, PRO	0.216U, PRO
Chromium (III)	>Max	530,000	>Max	NV	*	200	**28.6 PRO**	**27.4 PRO**	**28.2 PRO**	**28.7 PRO**	**31.3 PRO**
Cobalt	NE	NE	NE	NE	NE	NA	**16.8 PRO**	**16.3 PRO**	**16.0 PRO**	**15.7 PRO**	**15.9 PRO**
Copper	47,000	14,000	390,000	NV	*	73	**44.2 PRO**	**39.9 PRO**	**39.6 PRO**	**40.9 PRO**	**47.5 PRO**
Lead	800	800	800	NV	30	34	**246 PRO**	**98.4 PRO**	**28.9 PRO**	**31.9 PRO**	**19.1 PRO**
Mercury	350	110	2,900	NV	*	0.24	0.0877U, PRO	0.0886U, PRO	0.0900U, PRO	0.0868U, PRO	0.0865U, PRO
Molybdenum	NE	NE	NE	NE	NE	NA	1.10U, PRO	1.11U, PRO	1.12U, PRO	1.09U, PRO	1.08U, PRO
Nickel	22,000	7,000	190,000	NV	*	110	**25.7 PRO**	**26.3 PRO**	**26.8 PRO**	**26.2 PRO**	**28.5 PRO**
Selenium	NE	NE	NE	NE	NE	0.52	1.10U, PRO	1.11U, PRO	1.12U, PRO	1.09U, PRO	1.08U, PRO
Silver	5,800	1,800	49,000	NV	*	0.17	0.219U, PRO	0.222U, PRO	0.225U, PRO	0.217U, PRO	0.216U, PRO
Thalium	NE	NE	NE	NE	NE	2.8	**0.249 PRO**	**0.229 PRO**	0.225U, PRO	0.217U, PRO	0.219 PRO
Vanadium	NE	NE	NE	NE	NE	280	**66.7 PRO**	**63.4 PRO**	**65.1 PRO**	**62.8 PRO**	**68.4 PRO**
Zinc	NE	NE	NE	NE	NE	170	**77.7 PRO**	**60.4 PRO**	**55.8 PRO**	**59.2 PRO**	**67.7 PRO**

See notes on next page.

Table 1. Soil Samples Analytical Results - Total Metals
Supplemental Phase II Environmental Site Assessment - 3721 N. Foothill Rd., Medford, OR; 6.37-Acre Portion of Map 371W09 TL 900

Notes:

Analytical data in bold font indicates that the value exceeds the laboratory method reporting limit.

Analytical data highlighted in yellow indicates the value exceeded a generic RBC.

Analytical data highlighted in blue indicates the value exceeded the clean fill screening levels.

Analytical data highlighted in both yellow and blue indicates the value exceeded one or more generic RBCs and the Clean Fill Value.

* - Leaching to groundwater RBCs are not provided for inorganic chemicals. If this pathway is of concern, then site-specific leaching tests must be performed.

Data Qualifiers:

PRO -Sample has undergone sample processing prior to extraction and analysis.

U - The analyte was analyzed for, but was not detected above the analytical laboratory method reporting limit.

Footnotes:

(a) Risk-Based Concentrations are referenced from the July 2023 update to the DEQ's Risk-Based Decision Making for the Remediation of Petroleum-Contaminated Sites guidance document dated September 2003.

(b) This pathway is applicable anytime someone is likely to come into contact with contaminated soil. For the occupational scenario, exposure to contaminated soils should be considered for all contaminants found in the top three feet of soil.

(c) This pathway is applicable whenever vadose zone soils are contaminated with volatile compounds.

(d) This pathway is applicable whenever vadose zone contamination is found overlying an aquifer that is currently used or is reasonably likely to be used in the future for drinking water.

(e) DEQ's Background Concentrations in Soil are referenced from the DEQ's Development of Oregon Background Metals Concentrations in Soil technical report dated March 2013. The background concentrations included in this table are 95% Upper Prediction Limit (UPL) for the Cascade Mountains region, which includes the Medford area and the Site.

(f) Clean Fill Values are referenced from the DEQ's Clean Fill Determinations Internal Management Directive document dated February 2019.

Symbols/Acronyms:

bgs - below ground surface

C.W. - construction worker receptor

DEQ - Department of Environmental Quality

E.W. - excavation worker receptor

ft - feet

ICP-MS - Inductively Coupled Plasma Mass Spectrometry

>Max - The constituent RBC for this pathway is greater than 1,000,000 mg/Kg or 1,000,000 mg/L. Therefore, these substances are not expected to pose risks in the scenario shown.

mg/kg - milligrams per kilogram

NA - Sample was not analyzed for this analyte.

NE - No RBC levels are established for this chemical.

NV - The chemical is considered "nonvolatile" for the purposes of the exposure calculations.

RBC - risk-based concentration

OCC - occupational receptors

USEPA - United States Environmental Protection Agency

Table 2. Soil Samples Analytical Results - Organochlorine Pesticides
Supplemental Phase II Environmental Site Assessment - 3721 N. Foothill Rd., Medford, OR; 6.37-Acre Portion of Map 371W09 TL 900

	DEQ Risk-Based Concentrations for Soil (a)						Test Pit Samples				
	Ingestion, Dermal Contact and Inhalation (b)			Volatilization to Outdoor Air (c)	Leaching to Groundwater (d)	DEQ's Clean fill screening levels (e)	COMP-0.0-0.5	COMP-0.5-1.0	COMP-1.0-1.5	COMP-1.5-2.0	COMP-2.0-3.0
							Composite soil samples of subsamples collected from test pits TP1 through TP10				
							0.0-0.5 ft bgs	0.5-1.0 ft bgs	1.0-1.5 ft bgs	1.5-2.0 ft bgs	2.0-3.0 ft bgs
Parameter	OCC.	C.W.	E.W.	OCC.	OCC.		04/10/25	04/10/25	04/10/25	04/10/25	04/10/25
Organochlorine Pesticides (mg/kg) USEPA 8081B											
Aldrin	0.13	1.1	30	>Csat	0.1	0.023	0.0178U, C-05, PRO	0.00894 C-05, PRO	0.00177U, C-05, PRO	0.00180U, C-05, PRO	0.00179U, C-05, PRO
alpha-BHC	0.36	3	83	NV	0.023	0.0063	0.0178U, C-05, PRO	0.00894 C-05, PRO	0.00177U, C-05, PRO	0.00180U, C-05, PRO	0.00179U, C-05, PRO
beta-BHC	NE	NE	NE	NE	NE	0.009	0.0178U, C-05, PRO	0.00894 C-05, PRO	0.00177U, C-05, PRO	0.00180U, C-05, PRO	0.00179U, C-05, PRO
delta-BHC	NE	NE	NE	NE	NE	NE	0.0178U, C-05, PRO	0.00894 C-05, PRO	0.00177U, C-05, PRO	0.00180U, C-05, PRO	0.00179U, C-05, PRO
gamma-BHC (Lindane)	2.1	17	470	NV	0.13	0.0095	0.0178U, C-05, PRO	0.00894 C-05, PRO	0.00177U, C-05, PRO	0.00180U, C-05, PRO	0.00179U, C-05, PRO
Chlordane	7.4	61	1700	>Csat	2.1	0.91	0.534U, C-05, PRO	0.268 C-05, PRO	0.0532U, C-05, PRO	0.0541U, C-05, PRO	0.0536U, C-05, PRO
cis-Chlordane (Chlordane RBCs)	7.4	61	1700	>Csat	2.1	0.91	0.0178U, C-05, PRO	0.00894 C-05, PRO	0.00177U, C-05, PRO	0.00180U, C-05, PRO	0.00179U, C-05, PRO
trans-Chlordane (Chlordane RBCs)	7.4	61	1700	>Csat	2.1	0.91	0.0178U, C-05, PRO	0.00894 C-05, PRO	0.00177U, C-05, PRO	0.00180U, C-05, PRO	0.00179U, C-05, PRO
4,4'-DDD	12	94	2,600	NV	2.6	0.0063	0.0178U, C-05, PRO	0.00894 C-05, PRO	0.00177U, C-05, PRO	0.00180U, C-05, PRO	0.00179U, C-05, PRO
4,4'-DDE	8.2	66	1,800	>Csat	7.5	0.01	**0.477 C-05, PRO**	**0.250 C-05, PRO**	**0.0372 C-05, PRO**	**0.0683 C-05, PRO**	**0.0162 C-05, PRO**
4,4-DDT	8.5	66	1,800	NV	70	0.01	**0.0843 C-05, PRO**	**0.0365 C-05, PRO**	**0.00334 C-05, PRO**	**0.00997 C-05, PRO**	**0.00192 C-05, PRO**
Dieldrin	0.14	1.2	33	NV	0.030	0.0045	**0.0313 C-05, PRO**	**0.0191 C-05, PRO**	0.00177U, C-05, PRO	**0.00221 C-05, PRO**	0.00179U, C-05, PRO
Endosulfan I (Endosulfan alpha-beta RBC)	4900	1600	45,000	>Max	>Csat	0.64	0.0178U, C-05, PRO	0.00894 C-05, PRO	0.00177U, C-05, PRO	0.00180U, C-05, PRO	0.00179U, C-05, PRO
Endosulfan II (Endosulfan alpha-beta RBC)	4900	1600	45,000	>Max	>Csat	0.64	0.0178U, C-05, PRO	0.00894 C-05, PRO	0.00177U, C-05, PRO	0.00180U, C-05, PRO	0.00179U, C-05, PRO
Endosulfan Sulfate (Endosulfan alpha-beta RBC)	4900	1600	45,000	>Max	>Csat	0.64	0.0178U, C-05, PRO	0.00894 C-05, PRO	0.00177U, C-05, PRO	0.00180U, C-05, PRO	0.00179U, C-05, PRO
Endrin	250	80	2200	NV	>Csat	0.0014	0.0178U, C-05, PRO	0.00894 C-05, PRO	0.00177U, C-05, PRO	0.00180U, C-05, PRO	0.00179U, C-05, PRO
Endrin Aldehyde (Endrin RBC)	250	80	2200	NV	>Csat	0.0014	0.0178U, C-05, PRO	0.00894 C-05, PRO	0.00177U, C-05, PRO	0.00180U, C-05, PRO	0.00179U, C-05, PRO
Endrin Ketone (Endrin RBC)	250	80	2200	NV	>Csat	0.0014	0.0178U, C-05, PRO	0.00894 C-05, PRO	0.00177U, C-05, PRO	0.00180U, C-05, PRO	0.00179U, C-05, PRO
Heptachlor	0.45	4	110	230	0.048	0.017	0.0178U, C-05, PRO	0.00894 C-05, PRO	0.00177U, C-05, PRO	0.00180U, C-05, PRO	0.00179U, C-05, PRO
Heptachlor expoxide	0.24	2	56	>Csat	0.016	0.0042	**0.0178U, C-05, PRO**	0.00894 C-05, PRO	0.00177U, C-05, PRO	0.00180U, C-05, PRO	0.00179U, C-05, PRO
Methoxychlor	NE	NE	NE	NE	NE	5.1	0.0534U, C-05, PRO	0.0268 C-05, PRO	0.00532U, C-05, PRO	0.00541U, C-05, PRO	0.00536U, C-05, PRO
Toxaphene (Total)	2.1	17	470	NV	0.93	0.36	0.534U, C-05, PRO	0.268 C-05, PRO	0.0532U, C-05, PRO	0.0541U, C-05, PRO	0.0536U, C-05, PRO

See notes on next page.

Table 2. Soil Samples Analytical Results - Organochlorine Pesticides
Supplemental Phase II Environmental Site Assessment - 3721 N. Foothill Rd., Medford, OR; 6.37-Acre Portion of Map 371W09 TL 900

	DEQ Risk-Based Concentrations for Soil (a)					DEQ's Clean fill screening levels (e)	Test Pit Samples		
	Ingestion, Dermal Contact and Inhalation (b)			Volatilization to Outdoor Air (c)	Leaching to Groundwater (d)		Foothill-3.0-4.0	Foothill-4.0-5.0	Foothill-5.0-6.0
							Composite soil sample of subsamples collected from test pits TP12 throughTP14 and TP16 throghTP18	Composite soil sample of subsamples collected from test pits TP13, TP14 and TP16	Soil samples collected from test pit TP13
							3.0-4.0 ft bgs	4.0-5.0 ft bgs	5.0-6.0 ft bgs
Parameter	OCC.	C.W.	E.W.	OCC.	OCC.		7/30/2025	7/30/2025	7/30/2025
Organochlorine Pesticides (mg/kg) USEPA 8081B									
Aldrin	0.13	1.1	30	>Csat	0.1	0.023	NA	NA	NA
alpha-BHC	0.36	3	83	NV	0.023	0.0063	NA	NA	NA
beta-BHC	NE	NE	NE	NE	NE	0.009	NA	NA	NA
delta-BHC	NE	NE	NE	NE	NE	NE	NA	NA	NA
gamma-BHC (Lindane)	2.1	17	470	NV	0.13	0.0095	NA	NA	NA
Chlordane	7.4	61	1700	>Csat	2.1	0.91	NA	NA	NA
cis-Chlordane (Chlordane RBCs)	7.4	61	1700	>Csat	2.1	0.91	NA	NA	NA
trans-Chlordane (Chlordane RBCs)	7.4	61	1700	>Csat	2.1	0.91	NA	NA	NA
4,4'-DDD	12	94	2,600	NV	2.6	0.0063	NA	NA	NA
4,4'-DDE	8.2	66	1,800	>Csat	7.5	0.01	**0.00245 PRO**	0.000921U, PRO	**0.00255 PRO**
4,4-DDT	8.5	66	1,800	NV	70	0.01	NA	NA	NA
Dieldrin	0.14	1.2	33	NV	0.030	0.0045	NA	NA	NA
Endosulfan I (Endosulfan alpha-beta RBC)	4900	1600	45,000	>Max	>Csat	0.64	NA	NA	NA
Endosulfan II (Endosulfan alpha-beta RBC)	4900	1600	45,000	>Max	>Csat	0.64	NA	NA	NA
Endosulfan Sulfate (Endosulfan alpha-beta RBC)	4900	1600	45,000	>Max	>Csat	0.64	NA	NA	NA
Endrin	250	80	2200	NV	>Csat	0.0014	NA	NA	NA
Endrin Aldehyde (Endrin RBC)	250	80	2200	NV	>Csat	0.0014	NA	NA	NA
Endrin Ketone (Endrin RBC)	250	80	2200	NV	>Csat	0.0014	NA	NA	NA
Heptachlor	0.45	4	110	230	0.048	0.017	NA	NA	NA
Heptachlor expoxide	0.24	2	56	>Csat	0.016	0.0042	NA	NA	NA
Methoxychlor	NE	NE	NE	NE	NE	5.1	NA	NA	NA
Toxaphene (Total)	2.1	17	470	NV	0.93	0.36	NA	NA	NA

See notes on next page.

Table 2. Soil Samples Analytical Results - Organochlorine Pesticides
Supplemental Phase II Environmental Site Assessment - 3721 N. Foothill Rd., Medford, OR; 6.37-Acre Portion of Map 371W09 TL 900

Notes:

Analytical data in bold font indicates that the value exceeds the laboratory method reporting limit.

Analytical data highlighted in blue indicates the value exceeded the clean fill screening levels.

Analytical data highlighted in both yellow and blue indicates the value exceeded one or more generic RBCs and the Clean Fill Value.

Analytical data highlighted in blue font indicates the method reporting limit exceeds an RBC.

Data Qualifiers:

C-05 - Extract has undergone a GPC (Gel-Permeation Chromatography) cleanup per EPA 3640A. Reporting levels may be raised due to dilution necessary for cleanup. Sample Final Volume includes the GPC dilution factor, see the Prep page for details.

PRO - Sample has undergone sample processing prior to extraction and analysis.

U - The analyte was analyzed for, but was not detected above the analytical laboratory method reporting limit.

Footnotes:

(a) Risk-Based Concentrations are referenced from the July 2023 update to the DEQ's Risk-Based Decision Making for the Remediation of Petroleum-Contaminated Sites guidance document dated September 2003.

(b) This pathway is applicable anytime someone is likely to come into contact with contaminated soil. For the occupational scenario, exposure to contaminated soils should be considered for all

(c) This pathway is applicable whenever vadose zone soils are contaminated with volatile compounds.

(e) This pathway is applicable whenever vadose zone contamination is found overlying an aquifer that is currently used or is reasonably likely to be used in the future.

(f) Clean Fill Values are referenced from the DEQ's Clean Fill Determinations Internal Management Directive document dated February 2019.

Symbols/Acronyms:

bgs - below ground surface

C.W. - construction worker receptor

>Csat - The soil RBC exceeds the limit of three-phase equilibrium partitioning. Soil concentrations in excess of this value indicate free product might be present.

DEQ - Department of Environmental Quality

E.W. - excavation worker receptor

ft - feet

>Max - The constituent RBC for this pathway is greater than 1,000,000 mg/Kg or 1,000,000 mg/L. Therefore, these substances are not expected to pose risks in the scenario shown.

mg/kg - milligrams per kilogram

NA - Sample was not analyzed for this analyte.

NE - No RBC levels are established for this chemical.

OCC - occupational receptors

RBC - risk-based concentration

USEPA - United States Environmental Protection Agency

alpha-BHC = alpha-Hexachlorocyclohexane
4,4'-DDD = 4,4'-Dichlorodiphenyldichloroethane
4,4'-DDE = 4,4'-Dichlorodiphenyldichloroethene
4,4-DDT = 4,4'-Dichlorodiphenyltrichloroethane

Table 3. Soil Samples Analytical Results - Organophosphorus Herbicides
Supplemental Phase II Environmental Site Assessment - 3721 N. Foothill Rd., Medford, OR; 6.37-Acre Portion of Map 371W09 TL 900

	DEQ Risk-Based Concentrations for Soil (a)					DEQ's Clean fill screening levels (e)	Test Pit Samples				
	Ingestion, Dermal Contact and Inhalation (b)			Volatilization to Outdoor Air (c)	Leaching to Groundwater (d)		COMP-0.0-0.5	COMP-0.5-1.0	COMP-1.0-1.5	COMP-1.5-2.0	COMP-2.0-3.0
							Composite soil samples of subsamples collected from test pits TP1 through TP10				
							0.0-0.5 ft bgs	0.5-1.0 ft bgs	1.0-1.5 ft bgs	1.5-2.0 ft bgs	2.0-3.0 ft bgs
Parameter	OCC.	C.W.	E.W.	OCC.	OCC.		04/10/25	04/10/25	04/10/25	04/10/25	04/10/25
Organophosphorus Pesticides (mg/kg) USEPA Method 8270E											
Azinphos methyl (Guthion)	NE	NE	NE	NE	NE	1	0.0446U, PRO	0.0467U, PRO	0.0452U, PRO	0.0440U, PRO	0.0464U, PRO
Chlorpyrifos	NE	NE	NE	NE	NE	7.2	0.0446U, PRO	0.0467U, PRO	0.0452U, PRO	0.0440U, PRO	0.0464U, PRO
Coumaphos	NE	NE	NE	NE	NE	NE	0.0446U, PRO	0.0467U, PRO	0.0452U, PRO	0.0440U, PRO	0.0464U, PRO
Demeton-O	NE	NE	NE	NE	NE	2.5	0.0446U, PRO	0.0467U, PRO	0.0452U, PRO	0.0440U, PRO	0.0464U, PRO
Demeton-S	NE	NE	NE	NE	NE	2.5	0.0446U, PRO	0.0467U, PRO	0.0452U, PRO	0.0440U, PRO	0.0464U, PRO
Diazinon	NE	NE	NE	NE	NE	3.9	0.0446U, PRO	0.0467U, PRO	0.0452U, PRO	0.0440U, PRO	0.0464U, PRO
Dichlorvos	NE	NE	NE	NE	NE	0.0049	**0.0446U, PRO**	**0.0467U, PRO**	**0.0452U, PRO**	**0.0440U, PRO**	**0.0464U, PRO**
Dimethoate	NE	NE	NE	NE	NE	0.59	0.0446U, PRO	0.0467U, PRO	0.0452U, PRO	0.0440U, PRO	0.0464U, PRO
Disulfoton	NE	NE	NE	NE	NE	0.056	0.0446U, PRO	0.0467U, PRO	0.0452U, PRO	0.0440U, PRO	0.0464U, PRO
EPN	NE	NE	NE	NE	NE	0.17	0.0446U, PRO	0.0467U, PRO	0.0452U, PRO	0.0440U, PRO	0.0464U, PRO
Ethoprop	NE	NE	NE	NE	NE	NE	0.0446U, PRO	0.0467U, PRO	0.0452U, PRO	0.0440U, PRO	0.0464U, PRO
Fensulfothion	NE	NE	NE	NE	NE	NE	0.0446U, PRO	0.0467U, PRO	0.0452U, PRO	0.0440U, PRO	0.0464U, PRO
Fenthion	NE	NE	NE	NE	NE	NE	0.0446U, PRO	0.0467U, PRO	0.0452U, PRO	0.0440U, PRO	0.0464U, PRO
Malathion	NE	NE	NE	NE	NE	6	0.0446U, PRO	0.0467U, PRO	0.0452U, PRO	0.0440U, PRO	0.0464U, PRO
Merphos	NE	NE	NE	NE	NE	NE	0.145U, R-02, PRO	0.0860U, R-02, PRO	0.0452U, PRO	0.0440U, PRO	0.0464U, PRO
Methyl parathion	NE	NE	NE	NE	NE	2.3	0.0446U, PRO	0.0467U, PRO	0.0452U, PRO	0.0440U, PRO	0.0464U, PRO
Mevinphos (Phosdrin)	NE	NE	NE	NE	NE	NE	0.0446U, PRO	0.0467U, PRO	0.0452U, PRO	0.0440U, PRO	0.0464U, PRO
Monocrotophos	NE	NE	NE	NE	NE	NE	0.0446U, PRO	0.0467U, PRO	0.0452U, PRO	0.0440U, PRO	0.0464U, PRO
Naled (Dibrom)	NE	NE	NE	NE	NE	NE	0.0446U, PRO	0.0467U, PRO	0.0452U, PRO	0.0440U, PRO	0.0464U, PRO
Parathion, ethyl	NE	NE	NE	NE	NE	NE	0.0446U, PRO	0.0467U, PRO	0.0452U, PRO	0.0440U, PRO	0.0464U, PRO
Phorate	NE	NE	NE	NE	NE	1.1	0.0446U, PRO	0.0467U, PRO	0.0452U, PRO	0.0440U, PRO	0.0464U, PRO
Ronnel (Fenchlorphos)	NE	NE	NE	NE	NE	0.2	0.0446U, PRO	0.0467U, PRO	0.0452U, PRO	0.0440U, PRO	0.0464U, PRO
Sulfotep	NE	NE	NE	NE	NE	NE	0.0446U, PRO	0.0467U, PRO	0.0452U, PRO	0.0440U, PRO	0.0464U, PRO
Sulprofos (Bolstar)	NE	NE	NE	NE	NE	NE	0.0446U, PRO	0.0467U, PRO	0.0452U, PRO	0.0440U, PRO	0.0464U, PRO
TEPP	NE	NE	NE	NE	NE	NE	0.178U, PRO	0.187U, PRO	0.181U, PRO	0.176U, PRO	0.186U, PRO
Tetrachlorvinphos (Rabon)	NE	NE	NE	NE	NE	0.49	0.0446U, PRO	0.0467U, PRO	0.0452U, PRO	0.0440U, PRO	0.0464U, PRO
Tokuthion (Prothiofos)	NE	NE	NE	NE	NE	NE	0.0446U, PRO	0.0467U, PRO	0.0452U, PRO	0.0440U, PRO	0.0464U, PRO
Trichloronate	NE	NE	NE	NE	NE	NE	0.0446U, PRO	0.0467U, PRO	0.0452U, PRO	0.0440U, PRO	0.0464U, PRO

See notes on next page.

Table 3. Soil Samples Analytical Results - Organophosphorus Pesticides
Supplemental Phase II Environmental Site Assessment - 3721 N. Foothill Rd., Medford, OR; 6.37-Acre Portion of Map 371W09 TL 900

Notes:

Analytical data highlighted in blue font indicates the method reporting limit exceeds an RBC.

Data Qualifiers:

PRO - Sample has undergone sample processing prior to extraction and analysis.

R-02 - The Reporting Limit for this analyte has been raised to account for interference from coeluting organic compounds present in the sample.

U - The analyte was analyzed for, but was not detected above the analytical laboratory's method reporting limit.

Footnotes:

(a) Risk-Based Concentrations are referenced from the July 2023 update to the DEQ's Risk-Based Decision Making for the Remediation of Petroleum-Contaminated Sites guidance document dated September 2003.

(b) This pathway is applicable anytime someone is likely to come into contact with contaminated soil. For the occupational scenario, exposure to contaminated soils should be considered for all contaminants found in the top three feet of soil.

(c) This pathway is applicable whenever vadose zone soils are contaminated with volatile compounds.

(e) This pathway is applicable whenever vadose zone contamination is found overlying an aquifer that is currently used or is reasonably likely to be used in the future.

(f) Clean Fill Values are referenced from the DEQ's Clean Fill Determinations Internal Management Directive document dated February 2019.

Symbols/Acronyms:

bgs - below ground surface

C.W. - construction worker receptor

>Csat - The soil RBC exceeds the limit of three-phase equilibrium partitioning. Soil concentrations in excess of this value indicate free product might be present.

DEQ - Department of Environmental Quality

E.W. - excavation worker receptor

ft - feet

>Max - The constituent RBC for this pathway is greater than 1,000,000 mg/Kg or 1,000,000 mg/L. Therefore, these substances are not expected to pose risks in the scenario shown.

NA - Sample was not analyzed for this analyte.

NE - No RBC levels are established for this chemical.

ug/kg - microgrmas per kilogram

OCC - occupational receptors

RBC - risk-based concentration

USEPA - United States Environmental Protection Agency

Table 4. Soil Samples Analytical Results - Chlorinated Herbicides
Supplemental Phase II Environmental Site Assessment - 3721 N. Foothill Rd., Medford, OR; 6.37-Acre Portion of Map 371W09 TL 900

	DEQ Risk-Based Concentrations for Soil (a)					DEQ's Clean fill screening levels (e)	Test Pit Samples				
	Ingestion, Dermal Contact and Inhalation (b)			Volatilization to Outdoor Air (c)	Leaching to Groundwater (d)		COMP-0.0-0.5	COMP-0.5-1.0	COMP-1.0-1.5	COMP-1.5-2.0	COMP-2.0-3.0
							Composite soil samples of subsamples collected from test pits TP1 through TP10				
							0.0-0.5 ft bgs	0.5-1.0 ft bgs	1.0-1.5 ft bgs	1.5-2.0 ft bgs	2.0-3.0 ft bgs
Parameter	OCC.	C.W.	E.W.	OCC.	OCC.		04/10/25	04/10/25	04/10/25	04/10/25	04/10/25
Chlorinated Herbicides (mg/kg) USEPA 8321B											
2,4-DB	NE	NE	NE	NE	NE	25	0.0510U	0.0099U	0.0099U	0.0100U	0.0100U
2,4-D	8,200	2,700	74,000	NV	16	2.3	0.0250U	0.0049U	0.0050U	0.0050U	0.0050U
MCPA	410	130	3,700	NV	0.61	0.097	0.0250U	0.0049U	0.0050U	0.0050U	0.0050U
2,4,5-T	NE	NE	NE	NE	NE	4.1	0.0250U	0.0049U	0.0050U	0.0050U	0.0050U
2,4,5-TP (Silvex)	NE	NE	NE	NE	NE	3.7	0.0250U	0.0049U	0.0050U	0.0050U	0.0050U
MCPP	NE	NE	NE	NE	NE	NE	0.0250U	0.0049U	0.0050U	0.0050U	0.0050U
Dicamba	NE	NE	NE	NE	NE	9	0.0250U	0.0049U	0.0050U	0.0050U	0.0050U
Dichloroprop	NE	NE	NE	NE	NE	NE	0.0250U	0.0049U	0.0050U	0.0050U	0.0050U
Dalapon	NE	NE	NE	NE	NE	7.2	0.0510U	0.0099U	0.0099U	0.0100U	0.0100U
Dinoseb	NE	NE	NE	NE	NE	7.8	0.0510U	0.0099U	0.0099U	0.0100U	0.0100U

See notes on next page.

Table 4. Soil Samples Analytical Results - Chlorinated Herbicides
Phase II Environmental Site Assessment - 3721 North Foothill Rd., Medford, Oregon; 6.37-Acre Portion of Map 371W09 and TL 900

Notes:

Data Qualifiers:

H - Sample was prepped or analyzed beyond the specified holding time. This does not meet regulatory requirements.

H3 - Sample was received and analyzed past holding time. This does not meet regulatory requirements.

U - The analyte was analyzed for, but was not detected above the analytical laboratory's method reporting limit.

Footnotes:

(a) Risk-Based Concentrations are referenced from the July 2023 update to the DEQ's Risk-Based Decision Making for the Remediation of Petroleum-Contaminated Sites guidance document dated September 2003.

(b) This pathway is applicable anytime someone is likely to come into contact with contaminated soil. For the occupational scenario, exposure to contaminated soils should be considered for all contaminants found in the top three feet of soil.

(c) This pathway is applicable whenever vadose zone soils are contaminated with volatile compounds.

(e) This pathway is applicable whenever vadose zone contamination is found overlying an aquifer that is currently used or is reasonably likely to be used in the future for drinking water.

(f) Clean Fill Values are referenced from the DEQ's Clean Fill Determinations Internal Management Directive document dated February 2019.

Symbols/Acronyms:

bgs - below ground surface

C.W. - construction worker receptor

>Csat - The soil RBC exceeds the limit of three-phase equilibrium partitioning. Soil concentrations in excess of this value indicate free product might be present.

DEQ - Department of Environmental Quality

E.W. - excavation worker receptor

ft - feet

>Max - The constituent RBC for this pathway is greater than 1,000,000 mg/Kg or 1,000,000 mg/L. Therefore, these substances are not expected to pose risks in the scenario shown.

mg/kg - milligrams per kilogram

NA - Sample was not analyzed for this analyte.

NE - No RBC levels are established for this chemical.

OCC - occupational receptors

RBC - risk-based concentration

USEPA - United States Environmental Protection Agency

2.4-DB = 4-(2,4-dichlorophenoxy)butyric acid

2,4-D = 2,4-Dichlorophenoxyacetic acid

MCPA = 2-Methyl-4-chlorophenoxyacetic acid

2,4,5-T = 2,4,5-Trichlorophenoxyacetic acid

2,4,5-TP = 2-(2,4,5-trichlorophenoxy)propionic acid

MCPP = Methylchlorophenoxypropionic acid

Table 5. Soil Samples Analytical Results - Toxicity Characteristic Leaching Procedure
Supplemental Phase II Environmental Site Assessment - 3721 N. Foothill Rd., Medford, OR; 6.37-Acre Portion of Map 371W09 TL 900

Parameter	USEPA's Maximum Concentration of Contamination for the "toxicity" Characteristic (a)	Test Pit Soil Samples Foothill-0.0-1.0 Composite soil sample of subsamples collected from test pits TP11 through TP18 0.0-1.0 ft bgs 07/30/25
TCLP Metals (mg/L) **USEPA 1311/6020B (ICP-MS)**		
Lead	5	0.0500U

See notes on next page.

Table 5. Soil Samples Analytical Results - Toxicity Characteristic Leaching Procedure
Supplemental Phase II Environmental Site Assessment - 3721 N. Foothill Rd., Medford, OR; 6.37-Acre Portion of Map 371W09 TL 900

Notes:

Data Qualifiers:

U - The analyte was analyzed for, but was not detected above the analytical laboratory method reporting limit.

Footnotes:

(a) The USEPA 's TCLP limits are used to define whether a waste is hazardous or non-hazardous.

Symbols/Acronyms:

bgs - below ground surface
ft - feet
ICP-MS - Inductively Coupled Plasma Mass Spectrometry
mg/L - milligrams per liter
USEPA - United States Environmental Protection Agency
TCLP - Toxicity Characteristic Leaching Procedure

APPENDIX 1

Photographic Documentation

1. TP11 (39 inches).

4. TP12 (53 inches).

2. TP11 (39 inches).

5. TP12 (53 inches).

3. TP11 (39 inches).

6. TP12 (53 inches).

7. TP13 (69 inches).

10. TP14 (62 inches).

8. TP13 (69 inches).

11. TP14 (62 inches).

9. TP14 (62 inches).

12. TP15 (37 inches).

13. TP15 (37 inches).

16. TP16 (60 inches).

14. TP15 (37 inches).

17. TP16 (60 inches).

15. TP16 (60 inches).

18. TP17 (45 inches).

19. TP17 (45 inches).

22. TP18 (45 inches).

20. TP17 (45 inches).

21. TP18 (45 inches).

APPENDIX 3

Complete Laboratory Results

Apex Laboratories, LLC
6700 S.W. Sandburg Street
Tigard, OR 97223
503-718-2323
ORELAP ID: **OR100062**

ANALYTICAL REPORT

Friday, August 29, 2025

Jonathan Williams
Alpine Environmental Consultants
12210 Antioch Road
White City, OR 97503

RE: A5H0920 - Medford Water River Zone Reservior Prop - [none]

Thank you for using Apex Laboratories. We greatly appreciate your business and strive to provide the highest quality services to the environmental industry.

Enclosed are the results of analyses for work order A5H0920, which was received by the laboratory on 8/5/2025 at 12:30:00PM.

If you have any questions concerning this report or the services we offer, please feel free to contact me by email at: dthomas@apex-labs.com, or by phone at 503-718-2323.

Please note: All samples will be disposed of within 30 days of sample receipt, unless prior arrangements have been made.

Cooler Receipt Information
Acceptable Receipt Temperature is less than, or equal to, 6 degC (not frozen), or received on ice the same day as sampling.
(See Cooler Receipt Form for details)
Default Cooler 0.6 degC

This Final Report is the official version of the data results for this sample submission, unless superseded by a subsequent, labeled amended report.
All other deliverables derived from this data, including Electronic Data Deliverables (EDDs), CLP-like forms, client requested summary sheets, and all other products are considered secondary to this report.

Apex Laboratories

The results in this report apply to the samples analyzed in accordance with the chain of custody document(s) and updated by any subsequent written communications. This analytical report must be reproduced in its entirety.

Darwin Thomas, Business Development Director

Apex Laboratories, LLC
6700 S.W. Sandburg Street
Tigard, OR 97223
503-718-2323
ORELAP ID: **OR100062**

ANALYTICAL REPORT

Alpine Environmental Consultants	Project: **Medford Water River Zone Reservior Prop**	
12210 Antioch Road	Project Number: **[none]**	**Report ID:**
White City, OR 97503	Project Manager: **Jonathan Williams**	**A5H0920 - 08 29 25 0839**

ANALYTICAL REPORT FOR SAMPLES

SAMPLE INFORMATION

Client Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
Foothill-0.0-1.0	A5H0920-01	Soil	07/30/25 09:00	08/05/25 12:30
Foothill-0.0-1.0	A5H0920-02	Soil	07/30/25 09:00	08/05/25 12:30
Foothill-3.0-4.0	A5H0920-03	Soil	07/30/25 10:00	08/05/25 12:30
Foothill-3.0-4.0	A5H0920-04	Soil	07/30/25 10:00	08/05/25 12:30
Foothill-4.0-5.0	A5H0920-05	Soil	07/30/25 11:00	08/05/25 12:30
Foothill-4.0-5.0	A5H0920-06	Soil	07/30/25 11:00	08/05/25 12:30
Foothill-5.0-6.0	A5H0920-07	Soil	07/30/25 12:00	08/05/25 12:30
Foothill-5.0-6.0	A5H0920-08	Soil	07/30/25 12:00	08/05/25 12:30

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Darwin Thomas, Business Development Director

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Apex Laboratories, LLC
6700 S.W. Sandburg Street
Tigard, OR 97223
503-718-2323
ORELAP ID: **OR100062**

ANALYTICAL REPORT

Alpine Environmental Consultants	Project: **Medford Water River Zone Reservior Prop**	
12210 Antioch Road	Project Number: **[none]**	**Report ID:**
White City, OR 97503	Project Manager: **Jonathan Williams**	**A5H0920 - 08 29 25 0839**

ANALYTICAL SAMPLE RESULTS

Organochlorine Pesticides by EPA 8081B

Analyte	Sample Result	Detection Limit	Reporting Limit	Units	Dilution	Date Analyzed	Method Ref.	Notes
Foothill-3.0-4.0 (A5H0920-04)				**Matrix: Soil**		**Batch: 25H0343**		**PRO**
4,4'-DDE	**0.00245**	---	0.000902	mg/kg dry	1	08/12/25 22:38	EPA 8081B	
Surrogate: 2,4,5,6-TCMX (Surr)		*Recovery:*	*90 %*	*Limits:* *42-129 %*	*1*	*08/12/25 22:38*	*EPA 8081B*	
Decachlorobiphenyl (Surr)			*116 %*	*55-130 %*	*1*	*08/12/25 22:38*	*EPA 8081B*	
Foothill-4.0-5.0 (A5H0920-06)				**Matrix: Soil**		**Batch: 25H0343**		**PRO**
4,4'-DDE	ND	---	0.000921	mg/kg dry	1	08/12/25 23:10	EPA 8081B	
Surrogate: 2,4,5,6-TCMX (Surr)		*Recovery:*	*83 %*	*Limits:* *42-129 %*	*1*	*08/12/25 23:10*	*EPA 8081B*	
Decachlorobiphenyl (Surr)			*105 %*	*55-130 %*	*1*	*08/12/25 23:10*	*EPA 8081B*	
Foothill-5.0-6.0 (A5H0920-08)				**Matrix: Soil**		**Batch: 25H0343**		**PRO**
4,4'-DDE	**0.00255**	---	0.000920	mg/kg dry	1	08/12/25 23:27	EPA 8081B	
Surrogate: 2,4,5,6-TCMX (Surr)		*Recovery:*	*84 %*	*Limits:* *42-129 %*	*1*	*08/12/25 23:27*	*EPA 8081B*	
Decachlorobiphenyl (Surr)			*110 %*	*55-130 %*	*1*	*08/12/25 23:27*	*EPA 8081B*	

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ANALYTICAL REPORT

Alpine Environmental Consultants	Project: **Medford Water River Zone Reservior Prop**	
12210 Antioch Road	Project Number: **[none]**	**Report ID:**
White City, OR 97503	Project Manager: **Jonathan Williams**	**A5H0920 - 08 29 25 0839**

ANALYTICAL SAMPLE RESULTS

TCLP Metals by EPA 6020B (ICPMS)

Analyte	Sample Result	Detection Limit	Reporting Limit	Units	Dilution	Date Analyzed	Method Ref.	Notes
Foothill-0.0-1.0 (A5H0920-02)				**Matrix: Soil**				
Batch: 25H0361								
Lead	ND	---	0.0500	mg/L	10	08/12/25 14:26	1311/6020B	PRO

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ANALYTICAL REPORT

Alpine Environmental Consultants	Project: **Medford Water River Zone Reservior Prop**	
12210 Antioch Road	Project Number: **[none]**	**Report ID:**
White City, OR 97503	Project Manager: **Jonathan Williams**	**A5H0920 - 08 29 25 0839**

ANALYTICAL SAMPLE RESULTS

Percent Dry Weight

Analyte	Sample Result	Detection Limit	Reporting Limit	Units	Dilution	Date Analyzed	Method Ref.	Notes
Foothill-3.0-4.0 (A5H0920-04)				**Matrix: Soil**		**Batch: 25H0523**		**H-01, PRO**
% Solids	**98.9**	---	1.00	%	1	08/18/25 05:40	EPA 8000D	
Foothill-4.0-5.0 (A5H0920-06)				**Matrix: Soil**		**Batch: 25H0523**		**H-01, PRO**
% Solids	**97.7**	---	1.00	%	1	08/18/25 05:40	EPA 8000D	
Foothill-5.0-6.0 (A5H0920-08)				**Matrix: Soil**		**Batch: 25H0523**		**H-01, PRO**
% Solids	**97.7**	---	1.00	%	1	08/18/25 05:40	EPA 8000D	

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ANALYTICAL REPORT

Alpine Environmental Consultants	Project: **Medford Water River Zone Reservior Prop**	
12210 Antioch Road	Project Number: **[none]**	**Report ID:**
White City, OR 97503	Project Manager: **Jonathan Williams**	**A5H0920 - 08 29 25 0839**

QUALITY CONTROL (QC) SAMPLE RESULTS

Organochlorine Pesticides by EPA 8081B

Analyte	Result	Detection Limit	Reporting Limit	Units	Dilution	Spike Amount	Source Result	% REC	% REC Limits	RPD	RPD Limit	Notes
Batch 25H0343 - EPA 3546							**Soil**					
Blank (25H0343-BLK1)			Prepared: 08/12/25 07:46 Analyzed: 08/12/25 19:23									
EPA 8081B												
Aldrin	ND	---	0.00100	mg/kg wet	1	---	---	---	---	---	---	
alpha-BHC	ND	---	0.00100	mg/kg wet	1	---	---	---	---	---	---	
beta-BHC	ND	---	0.00100	mg/kg wet	1	---	---	---	---	---	---	
delta-BHC	ND	---	0.00100	mg/kg wet	1	---	---	---	---	---	---	
gamma-BHC (Lindane)	ND	---	0.00100	mg/kg wet	1	---	---	---	---	---	---	
cis-Chlordane	ND	---	0.00100	mg/kg wet	1	---	---	---	---	---	---	
trans-Chlordane	ND	---	0.00100	mg/kg wet	1	---	---	---	---	---	---	
4,4'-DDD	ND	---	0.00100	mg/kg wet	1	---	---	---	---	---	---	
4,4'-DDE	ND	---	0.00100	mg/kg wet	1	---	---	---	---	---	---	
4,4'-DDT	ND	---	0.00100	mg/kg wet	1	---	---	---	---	---	---	
Dieldrin	ND	---	0.00100	mg/kg wet	1	---	---	---	---	---	---	
Endosulfan I	ND	---	0.00100	mg/kg wet	1	---	---	---	---	---	---	
Endosulfan II	ND	---	0.00100	mg/kg wet	1	---	---	---	---	---	---	
Endosulfan sulfate	ND	---	0.00100	mg/kg wet	1	---	---	---	---	---	---	
Endrin	ND	---	0.00100	mg/kg wet	1	---	---	---	---	---	---	
Endrin aldehyde	ND	---	0.00100	mg/kg wet	1	---	---	---	---	---	---	
Endrin ketone	ND	---	0.00100	mg/kg wet	1	---	---	---	---	---	---	
Heptachlor	ND	---	0.00100	mg/kg wet	1	---	---	---	---	---	---	
Heptachlor epoxide	ND	---	0.00100	mg/kg wet	1	---	---	---	---	---	---	
Methoxychlor	ND	---	0.00300	mg/kg wet	1	---	---	---	---	---	---	
Chlordane (Technical)	ND	---	0.0300	mg/kg wet	1	---	---	---	---	---	---	
Toxaphene (Total)	ND	---	0.0300	mg/kg wet	1	---	---	---	---	---	---	
Surr: 2,4,5,6-TCMX (Surr)			*Recovery: 87 %*	*Limits: 42-129 %*				*Dilution: 1x*				
Decachlorobiphenyl (Surr)			*117 %*	*55-130 %*				*"*				
LCS (25H0343-BS1)			Prepared: 08/12/25 07:46 Analyzed: 08/12/25 19:40									
EPA 8081B												
Aldrin	0.0415	---	0.00100	mg/kg wet	1	0.0500	---	83	45-136%	---	---	
alpha-BHC	0.0454	---	0.00100	mg/kg wet	1	0.0500	---	91	45-137%	---	---	
beta-BHC	0.0440	---	0.00100	mg/kg wet	1	0.0500	---	88	50-136%	---	---	
delta-BHC	0.0445	---	0.00100	mg/kg wet	1	0.0500	---	89	47-139%	---	---	
gamma-BHC (Lindane)	0.0446	---	0.00100	mg/kg wet	1	0.0500	---	89	49-135%	---	---	
cis-Chlordane	0.0464	---	0.00100	mg/kg wet	1	0.0500	---	93	54-133%	---	---	

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503-718-2323
ORELAP ID: **OR100062**

ANALYTICAL REPORT

Alpine Environmental Consultants	Project: **Medford Water River Zone Reservior Prop**	
12210 Antioch Road	Project Number: **[none]**	**Report ID:**
White City, OR 97503	Project Manager: **Jonathan Williams**	**A5H0920 - 08 29 25 0839**

QUALITY CONTROL (QC) SAMPLE RESULTS

Organochlorine Pesticides by EPA 8081B

Analyte	Result	Detection Limit	Reporting Limit	Units	Dilution	Spike Amount	Source Result	% REC	% REC Limits	RPD	RPD Limit	Notes
Batch 25H0343 - EPA 3546								Soil				
LCS (25H0343-BS1)			Prepared: 08/12/25 07:46 Analyzed: 08/12/25 19:40									
trans-Chlordane	0.0488	---	0.00100	mg/kg wet	1	0.0500	---	98	53-135%	---	---	
4,4'-DDD	0.0558	---	0.00100	mg/kg wet	1	0.0500	---	112	56-139%	---	---	
4,4'-DDE	0.0502	---	0.00100	mg/kg wet	1	0.0500	---	100	56-134%	---	---	
4,4'-DDT	0.0579	---	0.00100	mg/kg wet	1	0.0500	---	116	50-141%	---	---	
Dieldrin	0.0496	---	0.00100	mg/kg wet	1	0.0500	---	99	56-136%	---	---	
Endosulfan I	0.0485	---	0.00100	mg/kg wet	1	0.0500	---	97	53-132%	---	---	
Endosulfan II	0.0518	---	0.00100	mg/kg wet	1	0.0500	---	104	53-134%	---	---	
Endosulfan sulfate	0.0530	---	0.00100	mg/kg wet	1	0.0500	---	106	55-136%	---	---	
Endrin	0.0518	---	0.00100	mg/kg wet	1	0.0500	---	104	57-140%	---	---	
Endrin aldehyde	0.0494	---	0.00100	mg/kg wet	1	0.0500	---	99	35-137%	---	---	
Endrin ketone	0.0552	---	0.00100	mg/kg wet	1	0.0500	---	110	55-136%	---	---	
Heptachlor	0.0464	---	0.00100	mg/kg wet	1	0.0500	---	93	47-136%	---	---	
Heptachlor epoxide	0.0480	---	0.00100	mg/kg wet	1	0.0500	---	96	52-136%	---	---	
Methoxychlor	0.0598	---	0.00300	mg/kg wet	1	0.0500	---	120	52-143%	---	---	
Surr: 2,4,5,6-TCMX (Surr)			*Recovery: 88 %*		*Limits: 42-129 %*			*Dilution: 1x*				
Decachlorobiphenyl (Surr)			*118 %*		*55-130 %*			*"*				
Duplicate (25H0343-DUP1)			Prepared: 08/12/25 07:46 Analyzed: 08/12/25 22:54									**PRO**
QC Source Sample: Foothill-3.0-4.0 (A5H0920-04)												
EPA 8081B												
Aldrin	ND	---	0.000914	mg/kg dry	1	---	ND	---	---	---	30%	
alpha-BHC	ND	---	0.000914	mg/kg dry	1	---	ND	---	---	---	30%	
beta-BHC	ND	---	0.000914	mg/kg dry	1	---	ND	---	---	---	30%	
delta-BHC	ND	---	0.000914	mg/kg dry	1	---	ND	---	---	---	30%	
gamma-BHC (Lindane)	ND	---	0.000914	mg/kg dry	1	---	ND	---	---	---	30%	
cis-Chlordane	ND	---	0.000914	mg/kg dry	1	---	ND	---	---	---	30%	
trans-Chlordane	ND	---	0.000914	mg/kg dry	1	---	ND	---	---	---	30%	
4,4'-DDD	ND	---	0.000914	mg/kg dry	1	---	ND	---	---	---	30%	
4,4'-DDE	**0.00271**	---	0.000914	mg/kg dry	1	---	0.00245	---	---	10	30%	
4,4'-DDT	ND	---	0.000914	mg/kg dry	1	---	0.000473	---	---	***	**30%**	
Dieldrin	ND	---	0.000914	mg/kg dry	1	---	ND	---	---	---	30%	
Endosulfan I	ND	---	0.000914	mg/kg dry	1	---	ND	---	---	---	30%	
Endosulfan II	ND	---	0.000914	mg/kg dry	1	---	ND	---	---	---	30%	
Endosulfan sulfate	ND	---	0.000914	mg/kg dry	1	---	ND	---	---	---	30%	

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ORELAP ID: **OR100062**

Alpine Environmental Consultants	Project: **Medford Water River Zone Reservior Prop**	
12210 Antioch Road	Project Number: **[none]**	**Report ID:**
White City, OR 97503	Project Manager: **Jonathan Williams**	**A5H0920 - 08 29 25 0839**

QUALITY CONTROL (QC) SAMPLE RESULTS

Organochlorine Pesticides by EPA 8081B

Analyte	Result	Detection Limit	Reporting Limit	Units	Dilution	Spike Amount	Source Result	% REC	% REC Limits	RPD	RPD Limit	Notes
Batch 25H0343 - EPA 3546							**Soil**					
Duplicate (25H0343-DUP1)			Prepared: 08/12/25 07:46		Analyzed: 08/12/25 22:54							**PRO**
QC Source Sample: Foothill-3.0-4.0 (A5H0920-04)												
Endrin	ND	---	0.000914	mg/kg dry	1	---	ND	---	---	---	30%	
Endrin aldehyde	ND	---	0.000914	mg/kg dry	1	---	ND	---	---	---	30%	
Endrin ketone	ND	---	0.000914	mg/kg dry	1	---	ND	---	---	---	30%	
Heptachlor	ND	---	0.000914	mg/kg dry	1	---	ND	---	---	---	30%	
Heptachlor epoxide	ND	---	0.000914	mg/kg dry	1	---	ND	---	---	---	30%	
Methoxychlor	ND	---	0.00274	mg/kg dry	1	---	ND	---	---	---	30%	
Chlordane (Technical)	ND	---	0.0274	mg/kg dry	1	---	ND	---	---	---	30%	
Toxaphene (Total)	ND	---	0.0274	mg/kg dry	1	---	ND	---	---	---	30%	
Surr: 2,4,5,6-TCMX (Surr)			*Recovery: 85 %*		*Limits: 42-129 %*				*Dilution: 1x*			
Decachlorobiphenyl (Surr)			*112 %*		*55-130 %*				*"*			
Matrix Spike (25H0343-MS1)			Prepared: 08/12/25 07:46		Analyzed: 08/12/25 23:43							**PRO**
QC Source Sample: Foothill-5.0-6.0 (A5H0920-08)												
EPA 8081B												
Aldrin	0.0368	---	0.000926	mg/kg dry	1	0.0463	ND	80	45-136%	---	---	
alpha-BHC	0.0400	---	0.000926	mg/kg dry	1	0.0463	ND	86	45-137%	---	---	
beta-BHC	0.0349	---	0.000926	mg/kg dry	1	0.0463	ND	75	50-136%	---	---	
delta-BHC	0.0396	---	0.000926	mg/kg dry	1	0.0463	ND	86	47-139%	---	---	
gamma-BHC (Lindane)	0.0396	---	0.000926	mg/kg dry	1	0.0463	ND	85	49-135%	---	---	
cis-Chlordane	0.0396	---	0.000926	mg/kg dry	1	0.0463	ND	85	54-133%	---	---	
trans-Chlordane	0.0411	---	0.000926	mg/kg dry	1	0.0463	ND	89	53-135%	---	---	
4,4'-DDD	0.0447	---	0.000926	mg/kg dry	1	0.0463	ND	97	56-139%	---	---	
4,4'-DDE	0.0468	---	0.000926	mg/kg dry	1	0.0463	0.00255	96	56-134%	---	---	
4,4'-DDT	0.0411	---	0.000926	mg/kg dry	1	0.0463	ND	89	50-141%	---	---	
Dieldrin	0.0404	---	0.000926	mg/kg dry	1	0.0463	ND	87	56-136%	---	---	
Endosulfan I	0.0381	---	0.000926	mg/kg dry	1	0.0463	ND	82	53-132%	---	---	
Endosulfan II	0.0378	---	0.000926	mg/kg dry	1	0.0463	ND	82	53-134%	---	---	
Endosulfan sulfate	0.0416	---	0.000926	mg/kg dry	1	0.0463	ND	90	55-136%	---	---	
Endrin	0.0313	---	0.000926	mg/kg dry	1	0.0463	ND	68	57-140%	---	---	
Endrin aldehyde	0.0315	---	0.000926	mg/kg dry	1	0.0463	ND	68	35-137%	---	---	
Endrin ketone	0.0417	---	0.000926	mg/kg dry	1	0.0463	ND	90	55-136%	---	---	
Heptachlor	0.0378	---	0.000926	mg/kg dry	1	0.0463	ND	82	47-136%	---	---	
Heptachlor epoxide	0.0396	---	0.000926	mg/kg dry	1	0.0463	ND	85	52-136%	---	---	

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ORELAP ID: **OR100062**

ANALYTICAL REPORT

Alpine Environmental Consultants	Project: **Medford Water River Zone Reservior Prop**	
12210 Antioch Road	Project Number: **[none]**	**Report ID:**
White City, OR 97503	Project Manager: **Jonathan Williams**	**A5H0920 - 08 29 25 0839**

QUALITY CONTROL (QC) SAMPLE RESULTS

Organochlorine Pesticides by EPA 8081B

Analyte	Result	Detection Limit	Reporting Limit	Units	Dilution	Spike Amount	Source Result	% REC	% REC Limits	RPD	RPD Limit	Notes
Batch 25H0343 - EPA 3546							**Soil**					
Matrix Spike (25H0343-MS1)			Prepared: 08/12/25 07:46		Analyzed: 08/12/25 23:43							**PRO**
QC Source Sample: Foothill-5.0-6.0 (A5H0920-08)												
Methoxychlor	0.0283	---	0.00278	mg/kg dry	1	0.0463	ND	61	52-143%	---	---	
Surr: 2,4,5,6-TCMX (Surr)			*Recovery: 84 %*		*Limits: 42-129 %*		*Dilution: 1x*					
Decachlorobiphenyl (Surr)			*106 %*		*55-130 %*		*"*					

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ANALYTICAL REPORT

Alpine Environmental Consultants	Project: **Medford Water River Zone Reservior Prop**	
12210 Antioch Road	Project Number: **[none]**	**Report ID:**
White City, OR 97503	Project Manager: **Jonathan Williams**	**A5H0920 - 08 29 25 0839**

QUALITY CONTROL (QC) SAMPLE RESULTS

TCLP Metals by EPA 6020B (ICPMS)

Analyte	Result	Detection Limit	Reporting Limit	Units	Dilution	Spike Amount	Source Result	% REC	% REC Limits	RPD	RPD Limit	Notes
Batch 25H0361 - EPA 1311/3015A							**Soil**					
Blank (25H0361-BLK1)			Prepared: 08/12/25 11:02		Analyzed: 08/12/25 14:10							
1311/6020B												
Lead	ND	---	0.0500	mg/L	10	---	---	---	---	---	---	TCLP
LCS (25H0361-BS1)			Prepared: 08/12/25 11:02		Analyzed: 08/12/25 14:15							
1311/6020B												
Lead	5.50	---	0.0500	mg/L	10	5.00	---	110	80-120%	---	---	TCLP
Duplicate (25H0361-DUP1)			Prepared: 08/12/25 11:02		Analyzed: 08/12/25 15:59							
QC Source Sample: Non-SDG (A5H1082-09)												
Lead	**0.384**	---	0.0500	mg/L	10	---	0.380	---	---	0.9	20%	
Matrix Spike (25H0361-MS1)			Prepared: 08/12/25 11:02		Analyzed: 08/12/25 16:15							
QC Source Sample: Non-SDG (A5H1082-09)												
1311/6020B												
Lead	5.63	---	0.0500	mg/L	10	5.00	0.380	105	50-150%	---	---	

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ORELAP ID: OR100062

ANALYTICAL REPORT

Alpine Environmental Consultants	Project: Medford Water River Zone Reservior Prop	
12210 Antioch Road	Project Number: [none]	Report ID:
White City, OR 97503	Project Manager: Jonathan Williams	A5H0920 - 08 29 25 0839

QUALITY CONTROL (QC) SAMPLE RESULTS

Percent Dry Weight

Analyte	Result	Detection Limit	Reporting Limit	Units	Dilution	Spike Amount	Source Result	% REC	% REC Limits	RPD	RPD Limit	Notes
Batch 25H0523 - Dry Weight Prep (EPA 8000D)								Soil				
Duplicate (25H0523-DUP1)			Prepared: 08/15/25 10:33		Analyzed: 08/18/25 05:40							
QC Source Sample: Non-SDG (A5H1113-01)												
% Solids	**95.5**	---	1.00	%	1	---	95.1	---	---	0.4	10%	
Duplicate (25H0523-DUP2)			Prepared: 08/15/25 10:33		Analyzed: 08/18/25 05:40							
QC Source Sample: Non-SDG (A5H1168-01)												
% Solids	**56.0**	---	1.00	%	1	---	59.1	---	---	5	10%	
Duplicate (25H0523-DUP3)			Prepared: 08/15/25 14:54		Analyzed: 08/18/25 05:40							
QC Source Sample: Non-SDG (A5H1276-01)												
% Solids	**88.7**	---	1.00	%	1	---	88.9	---	---	0.1	10%	
Duplicate (25H0523-DUP4)			Prepared: 08/15/25 14:54		Analyzed: 08/18/25 05:40							**COMP, DCNT**
QC Source Sample: Non-SDG (A5H1235-06RE1)												
% Solids	**65.9**	---	1.00	%	1	---	64.2	---	---	3	10%	
Duplicate (25H0523-DUP5)			Prepared: 08/15/25 14:54		Analyzed: 08/18/25 05:40							
QC Source Sample: Non-SDG (A5H1225-01)												
% Solids	**90.7**	---	1.00	%	1	---	90.9	---	---	0.2	10%	
Duplicate (25H0523-DUP6)			Prepared: 08/15/25 14:54		Analyzed: 08/18/25 05:40							
QC Source Sample: Non-SDG (A5H1208-01)												
% Solids	**74.2**	---	1.00	%	1	---	76.7	---	---	3	10%	
Duplicate (25H0523-DUP7)			Prepared: 08/15/25 19:10		Analyzed: 08/18/25 05:40							
QC Source Sample: Non-SDG (A5H1268-01)												
% Solids	**92.6**	---	1.00	%	1	---	90.8	---	---	2	10%	
Duplicate (25H0523-DUP8)			Prepared: 08/15/25 19:10		Analyzed: 08/18/25 05:40							
QC Source Sample: Non-SDG (A5H1277-01)												
% Solids	**73.7**	---	1.00	%	1	---	73.2	---	---	0.7	10%	

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Darwin Thomas, Business Development Director

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Apex Laboratories, LLC
6700 S.W. Sandburg Street
Tigard, OR 97223
503-718-2323
ORELAP ID: **OR100062**

ANALYTICAL REPORT

Alpine Environmental Consultants	Project: **Medford Water River Zone Reservior Prop**	
12210 Antioch Road	Project Number: **[none]**	**Report ID:**
White City, OR 97503	Project Manager: **Jonathan Williams**	**A5H0920 - 08 29 25 0839**

QUALITY CONTROL (QC) SAMPLE RESULTS

Percent Dry Weight

Analyte	Result	Detection Limit	Reporting Limit	Units	Dilution	Spike Amount	Source Result	% REC	% REC Limits	RPD	RPD Limit	Notes
Batch 25H0523 - Dry Weight Prep (EPA 8000D)							**Soil**					
Duplicate (25H0523-DUP9)			Prepared: 08/15/25 19:10		Analyzed: 08/18/25 05:40							
QC Source Sample: Non-SDG (A5H1290-02)												
% Solids	**78.1**	---	1.00	%	1	---	78.5	---	---	0.4	10%	

No Client related Batch QC samples analyzed for this batch. See notes page for more information.

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SAMPLE PREPARATION INFORMATION

Organochlorine Pesticides by EPA 8081B

Prep: EPA 3546

Lab Number	Matrix	Method	Sampled	Prepared	Sample Initial/Final	Default Initial/Final	RL Prep Factor
Batch: 25H0343							
A5H0920-04	Soil	EPA 8081B	07/30/25 10:00	08/12/25 07:46	11.21g/5mL	10g/5mL	0.89
A5H0920-06	Soil	EPA 8081B	07/30/25 11:00	08/12/25 07:46	11.11g/5mL	10g/5mL	0.90
A5H0920-08	Soil	EPA 8081B	07/30/25 12:00	08/12/25 07:46	11.12g/5mL	10g/5mL	0.90

TCLP Metals by EPA 6020B (ICPMS)

Prep: EPA 1311/3015A

Lab Number	Matrix	Method	Sampled	Prepared	Sample Initial/Final	Default Initial/Final	RL Prep Factor
Batch: 25H0361							
A5H0920-02	Soil	1311/6020B	07/30/25 09:00	08/12/25 11:02	10mL/50mL	10mL/50mL	1.00

Percent Dry Weight

Prep: Dry Weight Prep (EPA 8000D)

Lab Number	Matrix	Method	Sampled	Prepared	Sample Initial/Final	Default Initial/Final	RL Prep Factor
Batch: 25H0523							
A5H0920-04	Soil	EPA 8000D	07/30/25 10:00	08/15/25 10:33	1g	1g	1.00
A5H0920-06	Soil	EPA 8000D	07/30/25 11:00	08/15/25 10:33	1g	1g	1.00
A5H0920-08	Soil	EPA 8000D	07/30/25 12:00	08/15/25 10:33	1g	1g	1.00

TCLP Extraction by EPA 1311

Prep: EPA 1311 (TCLP)

Lab Number	Matrix	Method	Sampled	Prepared	Sample Initial/Final	Default Initial/Final	RL Prep Factor
Batch: 25H0314							
A5H0920-02	Soil	EPA 1311	07/30/25 09:00	08/11/25 15:01	100g/2001g	100g/2000g	NA

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White City, OR 97503	Project Manager:	**Jonathan Williams**	**A5H0920 - 08 29 25 0839**

QUALIFIER DEFINITIONS

Client Sample and Quality Control (QC) Sample Qualifier Definitions:

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COMP	Analyzed sample is a composite of discrete samples that was performed in the laboratory.
DCNT	Sample decanted due to the presence of sediment in water samples, or water in sediment or soil samples. (Note: Decanted aqueous sample bottles are not solvent rinsed.)
H-01	Analyzed outside the recommended holding time.
PRO	Sample has undergone sample processing prior to extraction and analysis.
TCLP	This batch QC sample was prepared with TCLP or SPLP fluid from preparation batch 25H0314.

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REPORTING NOTES AND CONVENTIONS:

Abbreviations:

DET Analyte DETECTED at or above the detection or reporting limit.

ND Analyte NOT DETECTED at or above the detection or reporting limit.

NR Result Not Reported

RPD Relative Percent Difference. RPDs for Matrix Spikes and Matrix Spike Duplicates are based on concentration, not recovery.

Detection Limits: Limit of Detection (LOD)

Validated Limits of Detection (LODs) are normally set at a level of one half the validated Limit of Quantitation (LOQ).
If no value is listed ('-----'), then the data has not been evaluated below the Reporting Limit.

Reporting Limits: Limit of Quantitation (LOQ)

Validated Limits of Quantitation (LOQs) are reported as the Reporting Limits for all analyses where the LOQ, MRL, PQL or CRL are requested. The LOQ represents a level at or above the low point of the calibration curve, that has been validated according to Apex Laboratories' comprehensive LOQ policies and procedures.

Reporting and Detection Limits: Default Limits

Default Reporting and Detection Limits are based on 100% dry weight with the minimum dilution for the analysis. Reporting and Detection Limits are raised due to moisture content, additional dilutions required for analysis, matrix interferences and in other cases, as necessary.

Reporting Conventions:

Basis: Results for soil samples are generally reported on a 100% dry weight basis.
The Result Basis is listed following the units as " dry", " wet", or " " (blank) designation.

" dry" Sample results and Reporting Limits are reported on a dry weight basis. (i.e. "ug/kg dry")
See Percent Solids section for details of dry weight analysis.

" wet" Sample results and Reporting Limits for this analysis are normally dry weight corrected, but have not been modified in this case.

" " Results without 'wet' or 'dry' designation are not normally dry weight corrected. These results are considered 'As Received'.

Results for Volatiles analyses on soils and sediments that are reported on a “dry weight” basis include the water miscible solvent (WMS) correction referenced in the EPA 8000 Method guidance documents. Solid and Liquid samples reported on an “As Received” basis do not have the WMS correction applied, as dry weight was not performed.

QC Source:

In cases where there is insufficient sample provided for Sample Duplicates and/or Matrix Spikes, a Lab Control Sample Duplicate (LCS Dup) may be analyzed to demonstrate accuracy and precision of the extraction batch.
Non-Client Batch QC Samples (Duplicates and Matrix Spike/Duplicates) may not be included in this report. Please request a Full QC report if this data is required.

Miscellaneous Notes:

" --- " QC results are not applicable. For example, % Recoveries for Blanks and Duplicates, % RPD for Blanks, Blank Spikes and Matrix Spikes, etc.

" *** " Used to indicate a possible discrepancy with the Sample and Sample Duplicate results when the %RPD is not available. In this case, either the Sample or the Sample Duplicate has a reportable result for this analyte, while the other is Non Detect (ND).

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12210 Antioch Road	Project Number:	**[none]**	**Report ID:**
White City, OR 97503	Project Manager:	**Jonathan Williams**	**A5H0920 - 08 29 25 0839**

REPORTING NOTES AND CONVENTIONS (Cont.):

Blanks:

Standard practice is to evaluate the results from Blank QC Samples down to a level equal to one half of the Reporting Limit (RL).
Blank results for gravimetric analyses are evaluated to the Reporting Level, not to half of the Reporting Level.
-For Blank hits falling between ½ the RL and the RL (J flagged hits), the associated sample and QC data will receive a 'B-02' qualifier.
-For Blank hits above the RL, the associated sample and QC data will receive a 'B' qualifier, per Apex Laboratories' Blank Policy.
For further details, please request a copy of this document.
-Sample results flagged with a 'B' or 'B-02' qualifier are potentially biased high if the sample results are less than ten times the level found in the blank for inorganic analyses, or less than five times the level found in the blank for organic analyses.
'B' and 'B-02' qualifications are only applied to sample results detected above the Reporting Level, if results are not reported to the MDL.

Preparation Notes:

Mixed Matrix Samples:

Water Samples:

Water samples containing significant amounts of sediment are decanted or separated prior to extraction, and only the water portion analyzed, unless otherwise directed by the client.

Soil and Sediment Samples:

Soil and Sediment samples containing significant amounts of water are decanted prior to extraction, and only the solid portion analyzed, unless otherwise directed by the client.

Sampling and Preservation Notes:

Certain regulatory programs, such as National Pollutant Discharge Elimination System (NPDES), require that activities such as sample filtration (for dissolved metals, orthophosphate, hexavalent chromium, etc.) and testing of short hold analytes (pH, Dissolved Oxygen, etc.) be performed in the field (on-site) within a short time window. In addition, sample matrix spikes are required for some analyses, and sufficient volume must be provided, and billable site specific QC requested, if this is required. All regulatory permits should be reviewed to ensure that these requirements are being met.

Data users should be aware of which regulations pertain to the samples they submit for testing. If related sample collection activities are not approved for a particular regulatory program, results should be considered estimates. Apex Laboratories will qualify these analytes according to the most stringent requirements, however results for samples that are for non-regulatory purposes may be acceptable.

Samples that have been filtered and preserved at Apex Laboratories per client request are listed in the preparation section of the report with the date and time of filtration listed.

Apex Laboratories maintains detailed records on sample receipt, including client label verification, cooler temperature, sample preservation, hold time compliance and field filtration. Data is qualified as necessary, and the lack of qualification indicates compliance with required parameters.

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ANALYTICAL REPORT

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Decanted Samples:

Soils/Sediments:
Unless TCLP analysis is required or there is notification otherwise for a specific project, all Soil and Sediments containing excess water are decanted prior to analysis in order to provide the most representative sample for analysis.

Water Samples:
Water samples containing solids and sediment may need to be decanted in order to eliminate these particulates from the water extractions. In the case of organics extractions, a solvent rinse of the container will not be performed.

Volatiles Soils (5035s)
Samples that are field preserved by 5035 for volatiles are dry weight corrected using the same dry weight corretion as for normal analyses. In the case of decanted samples, the dry weight may be performed on a decanted sample, while the aliquot for 5035 may not have been treated the same way. If this is a concern, please submit separate containers for dry weight analysis for volatiles can be provided.

All samples decanted in the laboratory are noted in this report with the DCNT qualifier indicating the sample was decanted.

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LABORATORY ACCREDITATION INFORMATION

ORELAP Certification ID: OR100062 (Primary Accreditation) - EPA ID: OR01039

All methods and analytes reported from work performed at Apex Laboratories are included on Apex Laboratories' ORELAP Scope of Certification, with the exception of any analyte(s) listed below:

Apex Laboratories

Matrix	Analysis	TNI_ID	Analyte	TNI_ID	Accreditation

All reported analytes are included in Apex Laboratories' current ORELAP scope.

Secondary Accreditations

Apex Laboratories also maintains reciprocal accreditation with non-TNI states (Washington DOE), as well as other state specific accreditations not listed here.

Subcontract Laboratory Accreditations

Subcontracted data falls outside of Apex Laboratories' Scope of Accreditation.
Please see the Subcontract Laboratory report for full details, or contact your Project Manager for more information.

Field Testing Parameters

Results for Field Tested data are provded by the client or sampler, and fall outside of Apex Laboratories' Scope of Accreditation.

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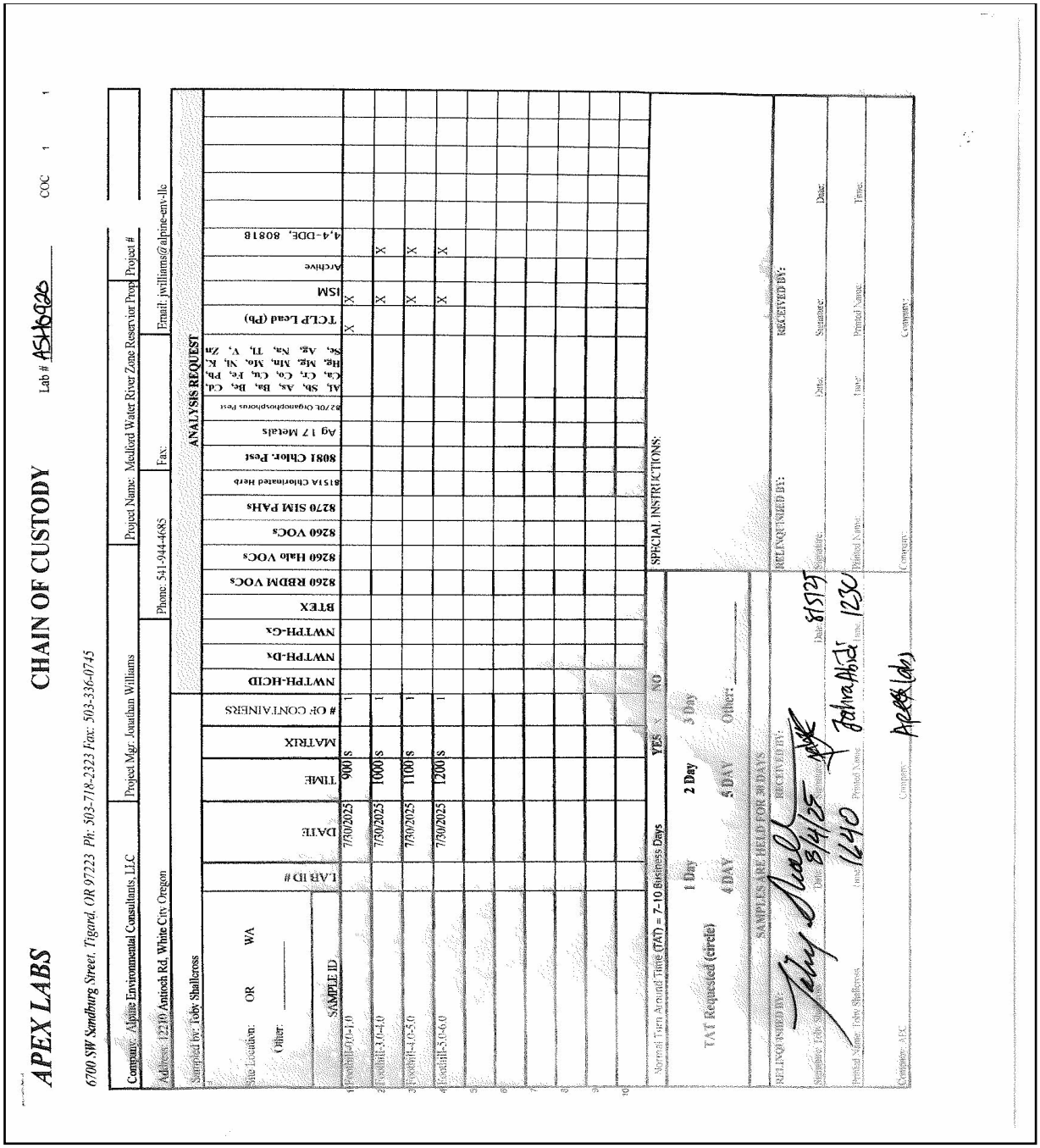

APEX LABS — CHAIN OF CUSTODY — Lab # A5H0920 — COC 1 of 1

6700 SW Sandburg Street, Tigard, OR 97223 Ph: 503-718-2323 Fax: 503-336-0745

Company: Alpine Environmental Consultants, LLC — Project Mgr: Jonathan Williams — Project Name: Medford Water River Zone Reservior Prop — Project #

Address: 12210 Antioch Rd, White City, Oregon — Phone: 541-944-4685 — Fax: — Email: jwilliams@alpine-env-llc

Sampled by: Toby Shallcross

Site Location: OR WA Other: _____

ANALYSIS REQUEST

SAMPLE ID	LAB ID #	DATE	TIME	MATRIX	# OF CONTAINERS	NWTPH-HCID	NWTPH-Dx	NWTPH-Gx	BTEX	8260 RBDM VOCs	8260 Halo VOCs	8260 VOCs	8270 SIM PAHs	8151A Chlorinated Herb	8081 Chlor. Pest	Ag 17 Metals	8270C Organophosphorus Pest	Al, Sb, As, Ba, Be, Cd, Ca, Cr, Co, Cu, Fe, Pb, Hg, Mg, Mn, Mo, Ni, K, Se, Ag, Na, Tl, V, Zn	TCLP Lead (Pb)	ISM	Archive	4,4-DDE, 80818
1 Foothill-0.0-1.0		7/30/2025	900	S	1														X		
2 Foothill-3.0-4.0		7/30/2025	1000	S	1														X	X	X
3 Foothill-4.0-5.0		7/30/2025	1100	S	1														X	X	X
4 Foothill-5.0-6.0		7/30/2025	1200	S	1														X	X	X
5																					
6																					
7																					
8																					
9																					
10																					

SPECIAL INSTRUCTIONS:

Normal Turn Around Time (TAT) = 7-10 Business Days — YES X — NO

TAT Requested (circle): 1 Day — 2 Day — 3 Day — 4 DAY — 5 DAY — Other: _____

SAMPLES ARE HELD FOR 30 DAYS

RELINQUISHED BY: Toby Shallcross — Date: 8/4/25 — Time: 1240 — Signature — Printed Name — Company: APEX

RECEIVED BY: Joshua Abst — Date: 8/5/25 — Time: 1230 — Signature — Printed Name — Company: Apex (dw)

RELINQUISHED BY: — Date: — Time: — Signature — Printed Name — Company:

RECEIVED BY: — Date: — Time: — Signature — Printed Name — Company:

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APEX LABORATORIES

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APEX LABS COOLER RECEIPT FORM

Client: Alpine Environmental Consultants Element WO#: A5H0920

Project/Project #: Medford Water River Zone Reservior Prop

Delivery Info:

Date/time received: 8/15/25 @ 1230 By: ZA

Delivered by: Apex__Client__ESS__FedEx✓UPS__Radio__Morgan__SDS__Evergreen__Other__

From USDA Regulated Origin? Yes ____ No ✓

Cooler Inspection Date/time inspected: 8/15/25 @ 1230 By: ZA

Chain of Custody included? Yes ✓ No ____

Signed/dated by client? Yes ✓ No ____

Contains USDA Reg. Soils? Yes ____ No ✓ Unsure (email RegSoils) ____

	Cooler #1	Cooler #2	Cooler #3	Cooler #4	Cooler #5	Cooler #6	Cooler #7
Temperature (°C)	0.6						
Custody seals? (Y/N)	N						
Received on ice? (Y/N)	Y						
Temp. blanks? (Y/N)	N						
Ice type: (Gel/Real/Other)	Real						
Condition (In/Out):	In						

Cooler out of temp? (Y(N)) Possible reason why: ____

Green dots applied to out of temperature samples? Yes/(No)

Out of temperature samples form initiated? Yes/(No)

Sample Inspection: Date/time inspected: 8/15/25 @ 16:26 By: KAM

All samples intact? Yes ✓ No ___ Comments: ____

Bottle labels/COCs agree? Yes ✓ No ___ Comments: ____

COC/container discrepancies form initiated? Yes ___ No ✓

Containers/volumes received appropriate for analysis? Yes ✓ No ___ Comments: ____

Do VOA vials have visible headspace? Yes ___ No ___ NA ✓

Comments ____

Water samples: pH checked: Yes___No___NA ✓ pH appropriate? Yes___No___NA ✓ pH ID: ____

Comments: ____

#3917 6379 3415

Labeled by: KAM Witness: ✓ Cooler Inspected by: KAM

Form Y-003 R-02

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