

October 15, 2025

File No. 04222021.00

Mr. Anthony Chavez
Mr. Don Hanson
Oregon Department of Environmental Quality

via email: Anthony.CHAVEZ@deq.oregon.gov
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Subject: Work Plan for Soil Delineation and Proposed Remedial Plan
Croman Mill Property (Oregon DEQ ECSI No. 535)
146 Mistletoe Road, Ashland, Oregon

Dear Anthony and Don:

On behalf of Dwain and Bud, LLC, SCS Engineers (SCS) has prepared this work plan detailing soil sampling of the remaining onsite areas and proposed cap as the remedial action for dioxin impacted soils identified on the former Croman Mill located in Ashland, Oregon (Figure 1). The initial site investigation was conducted under an approved Work Plan¹ and preliminary results were presented in a memo dated June 19, 2023². Soils in the area of the former dip tank Decision Unit 01 (DU01) and the two wood burners (DU02 and DU03) are impacted with dioxins and furans at concentrations above the Oregon Department of Environmental Quality (DEQ) residential and occupational risk-based concentrations (RBCs)³.

BACKGROUND

An approved work plan⁴ for interim remedial action and confirmation and delineation soil sampling was implemented in 2024. Soils from the two burner areas (DU02 and DU03) were permitted under a letter authorization for disposal at the Greb Pit in Eagle Point, Oregon. Soil from the dip tank area (DU01) was determined to be an F-listed hazardous waste based on the method of generation (drippings from the anti-stain wood treatment process). However, instead of treating it as a hazardous waste, an application was made to DEQ to re-evaluate the soil and a No Longer Contained-In (NLCI) determination was made, allowing disposal at a Subtitle D Landfill. The local

¹ SCS, 2023a. Revised Site Investigation Work Plan, Croman Mill Property, 146 Mistletoe Road, Ashland, Oregon, Oregon DEQ ECSI No. 535, February 25.

² SCS, 2023b. Memo to Anthony Chavez, Oregon Department of Environmental Quality (DEQ) re: Croman Mill Site, Ashland, Oregon – ECSI #535 Site Investigation Data, June 19.

³ DEQ, 2023. Risk-Based Concentrations for Individual Chemicals, Revision: May 2018 amended June 2023.

⁴ SCS Engineers, 2023c. FINAL Work Plan for Interim Remedial Action/Additional Soil Sampling, Croman Mill Property (Oregon DEQ ECSI No. 535), 146 Mistletoe Road, Ashland, Oregon. November 20.



landfill (Dry Creek Landfill) did not allow disposal of dioxin impacted soil so a permit for the DU01 soil disposal was obtained through Coffin Butte Landfill located near Albany, Oregon.

A total of approximately 880 tons of soil was removed from DU02 and DU03 during February 2024 and deposited at Greb Pit (27-mile trip one way). In April 2024, a total of approximately 895 tons of soil was removed from DU01 and disposed of at Coffin Butte Landfill (235-mile trip one way).

For DU02 and DU03, excavated areas included the original diameter of the burner plus an approximate 25% larger area, to a depth of 1 foot (light colored area shown in Figure 2). Following excavation, soil at the bottom of the excavation was sampled and a soil sample was collected from the surface soils around the perimeter of the excavation to delineate lateral extent. Remediation was proven to be effective at DU02, with dioxin and furan concentrations below residential RBCs. Confirmation and perimeter soil samples from DU03 had dioxin and furan concentrations above the residential and occupational RBCs but below construction and excavation worker RBCs (Table 1).

Additional soil was removed from DU03 during January 2025 from a circle expanded from 100-foot diameter to 150-foot diameter. The excavation was also deepened from 1 foot to 3 foot within the entire 150-foot diameter area. Soil were disposed of at Greb Pit under a renewed permit. After an additional 1,341 tons of soil was removed, confirmation sampling was conducted and analytical results in 2025 indicated similar results to 2024, which were above residential and occupational RBCs but below construction and excavation worker RBCs.

For DU01, the size of the original dip tank area was increased by approximately 25% and that total area removed down to 1 foot in depth. Confirmation samples were collected from the excavation and the perimeter outside the excavation. Perimeter soil samples were collected from the surface in each of the four directions from the rectangular excavation. Analytical results indicated that dioxins and furans in the confirmation and perimeter samples were all above residential and occupational RBCs, although the west side perimeter samples were below the Occupational RBC of 16 picograms per gram (pg/g or parts per trillion). The remaining five samples were above residential and occupational RBCs but below construction and excavation worker RBCs (Table 1).

The project has been paused to assess feasibility of additional soil testing, excavation, and disposal given likely soil quantities and associated costs. Disposal costs for DU01 are especially high due to the distance that soil is transported for disposal. Alternative options for soil disposal were discussed with DEQ.

June 2025 Sampling and Results

An onsite soil disposal cell was proposed as a remedial solution to isolate remaining dioxin-impacted soil. The area proposed for the cell was approximately 600-feet long area under a proposed walking/biking path, located along the eastern property boundary. At the request of DEQ, the soil currently located in the area proposed for a soil disposal cell was sampled down to 10 feet below ground surface (bgs) using a direct push drill rig. Samples were collected from 10 borings, at three depths and three subsamples per boring. These were combined for a single incremental sampling method (ISM) composite sample to characterize the area to be excavated for the soil disposal cell.

In addition, perimeter samples for DU01 and DU03 were sampled, just beyond the next proposed extent of excavation and the surface soil was sampled at approximately 0.5-foot depth. Thirty samples were collected from each side for the former dip tank and either side of the wigwam burner to create one ISM sample per area. Prior to analytical testing, each ISM sample was processed by the laboratory so that a representative sample was used for testing.

In addition, a soil pile from several Southern Oregon University (SOU) construction projects stockpiled near the site entrance was also sampled and analyzed. Again, 30 subsamples were collected from all areas of the pile using a backhoe.

Soil was tested for dioxins/furans by EPA Method 1613, as per the previous samples from the site. Analytical results reported as TCDD equivalents for the most recent samples are listed in Table 1. The proposed soil disposal cell area showed dioxin concentrations above residential and occupational RBCs, although below the construction worker RBC. Since this was the area where dioxin impacted soil was to be placed, these results seem to exclude it from being a viable option.

Perimeter samples from DU01 and DU03 did not show lower concentrations of dioxins when compared to previous sampling events; in some cases they were higher. If dioxin impacts were limited to the wood treatment area (dip tank) or waste disposal areas (e.g., burners), one would expect concentrations to decrease as distance from the suspected source increases. However, in some cases, concentrations increased and in others they decreased. Thus, it appears that the impacted soils may have been spread about the site during previous demolition activities. In the case of DU03, soils appear to have perhaps been pushed away from the source and used as fill in adjacent low areas, e.g., this may be the source of the detected dioxins in the proposed soil disposal cell area along the east property boundary, next to the railroad tracks.

Results from sampling the SOU soil pile indicated dioxin concentrations slightly above the residential RBC but below the occupational RBC. To confirm this result, this pile will be resampled, using 50 subsamples to compose the ISM sample.

Due to these analytical results for both the soil disposal cell area and the perimeter samples from DU01 and DU03, an onsite disposal cell did not appear to be an effective remedial solution; thus, other options were considered for the site.

REMEDIAL ACTION SOLUTIONS

Several different options for remediation of dioxin-impacted soils were considered, including the following:

- No action – cancel project indefinitely
- Remove impacted soils from site
- On-site disposal cell for impacted soils
- Cap impacted soils in place
- Conduct in situ biodegradation of dioxins in impacted soils
- Incineration of impacted soils (on- or off-site)
- Vitrification (solidification) of impacted soils to facilitate disposal
- Chemical treatment of impacted soils

Removal of impacted soils from the site was selected as the easiest option to implement and most effective in reducing human health risk, particularly for residential use. No action is considered a viable option for the property owners if costs exceed available resources. The soil treatment options (biological, chemical, incineration, or solidification) were eliminated from consideration due to the cost of implementation and the delay to future development.

While excavating the impacted soils and disposal at a landfill was initially effective to remediate DU01, additional landfill disposal is not sustainable due to the distance and cost to transport DU01 soils to Coffin Butte Landfill in Albany, Oregon. Initial estimates require at least an additional 2880 tons of soil to be removed from DU01. Based on the most recent sampling, this may be too low. Since future development requires this material to be removed from public access due to potential impacts to human health for residential and occupational users, it was proposed to isolate the material onsite in a disposal cell located in an area where minimal to no future disturbance is expected. Based on June 2025 analytical results, this could be challenging, both in finding an area to isolate the soil and the repeated excavation and testing required to remove impacted soils and confirm removal. This option was eliminated based on uncertain effectiveness, cost, and time to complete.

An alternative remedial action selected was to cap the impacted soil in place. By capping the dioxin impacted soils in place, additional sampling and analysis will be eliminated and a cap over the area would be designed to remove exposure to the impacted soil. This option can be implemented such that it provides protection in a timely and cost-effective manner. The remaining action to be taken is to sample and analyze soils not included in the capped area that have not previously been sampled and analyzed. These areas will need to be “cleared” to confirm that contaminated soil is not present in these areas above relevant RBCs.

PURPOSE AND PROCEDURES

The purpose of this work plan is to establish the procedures and protocol for sampling the remaining areas of the Site to confirm the lateral extent of dioxin-impacted soils. This work plan will also provide a conceptual cap design for covering the dioxin-impacted soils as the remedial solution. Detailed engineering plans for a cap will be provided at a later date.

Decision Units

Sampling for three additional DUs are proposed, although only two of them will need to be sampled, as described below (Figure 2).

DU09 includes the areas west of the impacted soils and has been reported to have been backfilled with four feet of “shale” and 1 foot of concrete to accommodate log trucks and unloading logs. No sampling will occur in this area.

DU10 includes the area north of the impacted soils where a very large pile of bark chips and organic material remains. Sampling will occur around the pile perimeter and throughout the remaining accessible areas. Since this area formerly included the kilns and “wrap” areas, there does not appear to have been a source of dioxins in this area.

DU11 includes the southern portion of the impacted area and includes the former veneer mill. The western portion of DU11 was reportedly excavated down to “granite rock” prior to construction of the veneer building, and therefore there may be limited soil in that area. An attempt will be made to advance 50 borings in this area and areas with shallow bedrock will be marked on a map.

Subsurface conditions of DU09 and DU11 were reported to SCS by personnel that were employed onsite and observed and/or participated in these activities. There is no formal documentation; only firsthand interviews with those involved.

Table 2. Decision Units

Sample Area	Reasoning	Sampling
DU01	Dip Tank	Dioxin impacts (range of 6.94 - 58.93 pg/g)
DU02	North wood burner	Dioxins below residential RBC (1.62 – 3.45 pg/g)
DU03	South Burner	Dioxin impacts (58.18 – 144.82 pg/g)
DU04	Veneer Mill	PAHs (below RBCs) and estimated PCBs on east side of building
DU05	Pond	Estimated TCDD detections (6.82 – 6.91 J pg/g) in sediments Diesel & motor oil in pond water
DU06	Maintenance Shop	North Side: Heavy oil in soil at north end (2200 mg/Kg) East Side: PAHs – benzo(a) pyrene at 160 ug/Kg and other PAHs detected.
DU07	North area	Nothing detected above RBCs.
DU08	Gas station area	Diesel and motor oil detected in GW.
DU09	Soft material removed and replaced with at least 4 feet of "shale" and then covered with 1 foot of concrete. Area used for unloading log trucks, log storage but no buildings or processing.	No sampling
DU10	North area with kilns, paper wrap and north burner (already cleaned up).	50 borings <i>per area</i> : random based on access and coverage across DU. Sample: <ul style="list-style-type: none"> • 0 to 1 foot (under gravel surface) • 1.0' to 2.0' • 2.0' to 3.0'
DU11	Veneer mill (west side) and log storage (east side) – previously excavated down to "granite bedrock" to provide flat area for mill.	Same sampling as above, if accessible. Depth may be limited due to encountering rock.

Soil Sampling

To characterize the remaining large areas to the north and south of the impacted dioxin soils, SCS proposes ISM sampling of DU10 and DU11. The ISM sample will be created from 50 subsamples to be collected over each DU and at three depths down to a total depth of 3 feet. Each will be specially processed by the laboratory to get a representative soil sample for analysis. DUs are depicted in Figure 1 and detailed in Table 2.

Areas covered in piles of material (e.g., rock, concrete, bark) will be sampled around the perimeters of the piles, as access allows. Where refusal is encountered prior to reaching 3 feet bgs, at least two more locations will be attempted prior to claiming refusal. Areas where a 3-foot depth is not reached will be marked on a map.

Samples will be collected from 1 foot depth intervals in each of the decision units so both vertical and lateral extent of dioxin contamination can be determined. A direct push drill rig will be used to obtain 5-foot long core samples in plastic sleeves via 2-inch diameter borings. The drill rig will complete 50 borings within each DU. The core will be opened and a soil sample collected from the following depths:

- 1) Surface to 1 foot
- 2) 1 to 2 feet
- 3) 2 to 3 feet

Aggregate samples taken from each depth will represent a single sample within each DU. Initially, just the surface to 1 foot and 1-to-2-foot soil samples will be analyzed and the 2-to-3-foot soil samples held. If either of the shallower soil samples have detections of dioxins above screening levels, then the deeper soil sample will be analyzed.

CAP Construction

Once the areas to the north and south have been confirmed to have dioxin concentrations below applicable RBCs, the area of impacted soil will be capped. The cap will include removal of vegetation, leveling off the area, removing or breaking up any concrete walls or floors, and placing a geotextile down in sections as it is covered with three feet of clean fill material. Geotextile will be applied according to manufacturer's instructions. Source(s) of clean fill will be tested prior to use. The material will be placed, graded, and then compacted in 1-foot lifts. Standard erosion control measures will be applied to the cap surface to meet construction water quality requirements.

A detailed plan for the cap with specifications will be submitted to DEQ for review and approval prior to installation. Analytical results will also be submitted to DEQ to confirm the lateral extent of the cap.

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REPORTING

Analytical results will be submitted to DEQ, along with a final cap design specification, as a technical memorandum, for review and discussion. All results will be included in a final closure report detailing sampling methods and results, as well as final details of the onsite soil cap, including a surveyed map showing the lateral extent and surface elevations.

SCHEDULE

Soil sampling is currently scheduled for the week of October 27th, with analytical results due in three to four weeks following submittal to the laboratory. A report showing these results, along with the final cap design, will be submitted within 1 month of receiving the analytical results. Barring unexpected results, Croman hopes to construct the cap on impacted area during Spring 2026.

Thank you for your time and assistance with this redevelopment project. If there are any questions, please feel free to contact either Barb (971-284-1297) or Shane (503-867-1780) via email or using the phone numbers provided.

Sincerely,



Barbara E. Lary, RG
Senior Geologist
SCS Engineers



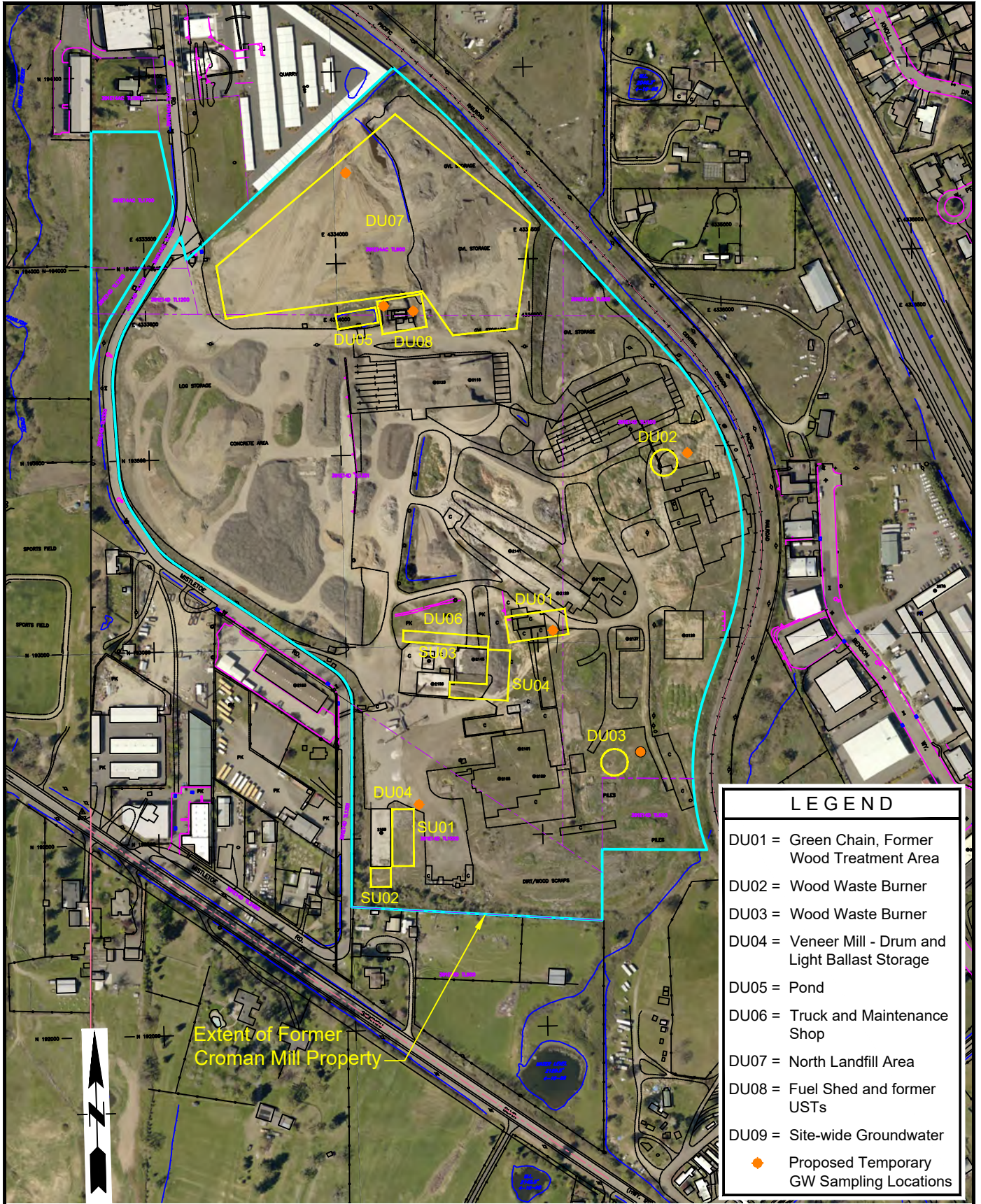
Shane D. Latimer, PhD
VP/Senior Environmental Planner
SCS Engineers

Attachments:

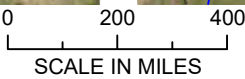
Table 1.	Summary of Soil Analytical Results
Table 2.	Decision Units
Figure 1	Site Plan
Figure 2	Proposed Additional Decision Units

cc: Mike Montero, Montero and Associates
Kory Kaufman, Croman Corporation

Figures



LEGEND	
DU01	Green Chain, Former Wood Treatment Area
DU02	Wood Waste Burner
DU03	Wood Waste Burner
DU04	Veneer Mill - Drum and Light Ballast Storage
DU05	Pond
DU06	Truck and Maintenance Shop
DU07	North Landfill Area
DU08	Fuel Shed and former USTs
DU09	Site-wide Groundwater
●	Proposed Temporary GW Sampling Locations



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PROJECT NO. 04222021.00	DES BY L.E.L.
SCALE AS SHOWN	CHK BY B.L.
CAD FILE FIGURE 4-1	APP BY S.L.

SITE PLAN
CROMAN PROPERTY
 146 MISTLETOE ROAD
 ASHLAND, OREGON 97520

DATE FEBRUARY 2023
FIGURE 1



DU07 - already tested and found to be clean.

DU05 DU08

SOU Soil Pile

DU09

DU10

DU02

DU01

DU06

This is the area to be capped.

DU11

DU03

DU04



Table

Table 1. Summary of Soil Analytical Results
Croman Site, Ashland, Oregon

Sample ID	B02-8	B03-17	DU01-230504-0.5	DU01-230504-0.5 REP1	DU01-230504-0.5 REP2	DU01-240425-1	DU01-240425-1-DUP	DU01-240425-0.5-W	DU01-240425-0.5-E	DU01-240425-0.5-N	DU01-240425-0.5-S	DU01_250 701_0.5 North	DU01_250 701_0.5 South	DU01_250 701_0.5 East	DU01_250 701_0.5 West
Area of the Site	Temporary boring NW of former USTs	Temporary boring near pump	Wood treatment Dip Tank	Wood treatment Dip Tank	Wood treatment Dip Tank	Wood treatment Dip Tank	Wood treatment Dip Tank	Wood treatment Dip Tank	Wood treatment Dip Tank	Wood treatment Dip Tank	Wood treatment Dip Tank	Wood treatment Dip Tank	Wood treatment Dip Tank	Wood treatment Dip Tank	Wood treatment Dip Tank
Reason for Sampling	Original Soil Sampling					Confirmation following excavation		Perimeter sampling following excavation				Perimeter sampling prior to excavation			
NWTPH- Gx, Dx (mg/Kg)															
gasoline (GRO)	5.9 U	6.2 U													
Diesel (DRO)	66	58 U	15 J	16 J	15 J										
heavy oil (RRO)	190	28 J	180	200	190										
RCRA 8 Metals (mg/Kg)															
Silver			0.8 U	0.71 U	0.73										
Arsenic			2.3	2.3	2.2										
Barium			51	56	53										
Cadmium			0.038 J	0.035 J	0.37 U										
Total Chromium			12 B	13 B	11 B										
Lead	2.9	6.9	5.2	4.8	4.2										
Selenium			1.4 U	1.3 U	1.3 U										
Total Mercury			0.036	0.061	0.04										
PAHs (µg/Kg)															
2-Methylnaphthalene	4.4 J	34 U	330 U	320 U	330 U										
Acenaphthene	33 U	34 U	330 U	320 U	330 U										
Acenaphthylene	33 U	34 U	330 U	320 U	330 U										
Benzo[a]anthracene	33 U	34 U	36 J	22 J	32 J										
Benzo[a]pyrene	5.5 J	34 U	90 J	76 J	87 J										
Benzo[b]fluoranthene	9.6 J	34 U	200 J	170 J	200 J										
Benzo[g,h,i]perylene	33 U	34 U	330 U	320 U	330 U										
Benzo[k]fluoranthene	33 U	34 U	330 U	320 U	330 U										
Chrysene	8.2 J	34 U	36 J	320 U	32 J										
Dibenz(a,h)anthracene	33 U	34 U	330 U	320 U	330 U										
Fluoranthene	7.3 J	34 U	330 U	320 U	330 U										
Fluorene	33 U	34 U	330 U	320 U	330 U										
Indeno[1,2,3-cd]pyrene	33 U	34 U	330 U	320 U	330 U										
Naphthalene	5.4 J	11 J	330 U	320 U	330 U										
Phenanthrene	11 J	34 U	330 U	320 U	330 U										
Pyrene	33 U	34 U	29 J	20 J	25 J										
Anthracene	33 U	34 U	330 U	320 U	330 U										
1-Methylnaphthalene	2.7 J	34 U	330 U	320 U	330 U										
PCBs (µg/Kg)															
total PCBs															
SVOCs (µg/Kg)															
Remaining SVOCs			ND	ND	ND										
Pentachlorophenol						1600 U	1600 U	1600 U	1600 U	1600 U	1600 U				
Trichlorophenol						1600 U	1600 U	1600 U	1600 U	1600 U	1600 U				
Dioxins and Furans (pg/g)															
2,3,7,8-TCDD equivalent (2005)			23.60	39.97	20.65	15.53	14.60	6.94	27.58	31.91	27.52	25.35	27.19	29.26	58.93

Samples represent soils that have been removed.
 April 2025 Confirmation Sampling
 June 2025 Perimeter Sampling
 Analyses not performed
Bold indicated above RBC and still present onsite.

Table 1. Summary of Soil Analytical Results
Croman Site, Ashland, Oregon

Sample ID	DU02-230504-0.5	DU02-240225-1	DU02-240225-0.5-W	DU02-240225-0.5-E	DU03-230505-0.5	DU03-230505-0.5-REP1	DU03-230505-0.5-REP2	DU03-240224-1	DU03-240224-0.5-W	DU03-240224-0.5-E	DU03-250130-3'	DU03-250130-W	DU03-250130-E	DU03-250730-0.5 West	DU03-250730-0.5 East
Area of the Site	North Wood Burner	North Wood Burner	North Wood Burner	North Wood Burner	South Wood Burner	South Wood Burner	South Wood Burner	South Wood Burner	South Wood Burner	South Wood Burner	South Wood Burner	West Side of South burner	East side of South burner	West Side of South burner	East side of South burner
Reason for Sampling	Original	Confirmation following excavation	Perimeter sampling following excavation.		Original Soil Sampling			Confirmation following excavation	Perimeter sampling following excavation.		Confirmation at 3' bgs	Perimeter sampling following excavation.		Perimeter sampling prior to excavation.	
NWTPH- Gx, Dx (mg/Kg)															
gasoline (GRO)															
Diesel (DRO)	12 J				35 J	27 J	35 J								
heavy oil (RRO)	110				360	300	360								
RCRA 8 Metals (mg/Kg)															
Silver	0.76 U				0.68 U	0.76 U	0.72 U								
Arsenic	2.9				2.2	2.3	2.3								
Barium	110				75	95	98								
Cadmium	0.058 J				0.047 J	0.046 J	0.059 J								
Total Chromium	22 B				15 B	18 B	18 B								
Lead	11				8.2	7.5	8.7								
Selenium	1.4 U				1.2 U	1.4 U	1.3 U								
Total Mercury	0.039				0.12	0.089	0.097								
PAHs (µg/Kg)															
2-Methylnaphthalene	1.9 J				4.8 J	3.8 J	5.4 J								
Acenaphthene	10 U				9.7 U	9.9 U	10 U								
Acenaphthylene	1.7 J				9.7 U	9.9 U	10 U								
Benzo[a]anthracene	10 U				2.8 J	3.2 J	10 U								
Benzo[a]pyrene	2.6 J				9.7 U	9.9 U	10 U								
Benzo[b]fluoranthene	2.9 J				4.8 J	3.7 J	3.6 J								
Benzo[g,h,i]perylene	2.7 J				2.2 J	2.3 J	10 U								
Benzo[k]fluoranthene	10 U				9.7 U	9.9 U	10 U								
Chrysene	3.2 J				5.6 J	5.6 J	4.5 J								
Dibenz(a,h)anthracene	10 U				9.7 U	9.9 U	10 U								
Fluoranthene	5.8 J				6.5 J	7.7 J	7.7 J								
Fluorene	10 U				2.9 J	2.4 J	2.9 J								
Indeno[1,2,3-cd]pyrene	2.2 J				9.7 U	9.9 U	10 U								
Naphthalene	7.5 J				20	17	22								
Phenanthrene	7.7 J				17	15	17								
Pyrene	4.7 J				4.2 J	6.4 J	6 J								
Anthracene	10 U				2 J	9.9 U	10 U								
1-Methylnaphthalene	1.3 J				3.1 J	2.3 J	3.6 J								
PCBs (µg/Kg)															
total PCBs															
SVOCs (µg/Kg)															
Remaining SVOCs															
Pentachlorophenol		1600 U	1600 U	1600 U				1600 U	1600 U	1600 U					
Trichlorophenol		1600 U	1600 U	1600 U				1600 U	1600 U	1600 U					
Dioxins and Furans (pg/g)															
2,3,7,8-TCDD equivalent (2005)	146.30	2.15 J	1.62J	3.45	122.20	152.50	24.77	74.52	109.39	67.73	92.96	144.82	58.18	79.41	93.73

Samples represent soils that have been removed.
 April 2025 Confirmation Sampling
 June 2025 Perimeter Sampling
 Analyses not performed
Bold indicated above RBC and still present onsite.

Table 1. Summary of Soil Analytical Results
Croman Site, Ashland, Oregon

Sample ID	SOUPile	Soil Disposal Cell 250702	DU04-SU01- 230504-0.5	DU04-SU02- 230504-0.5	DU06-SU03- 230504-0.5	DU06-SU04- 230505-0.5	DU07- 230502- Fill	DU07- 230502- Native	DEQ RBC Screening Level			
									Residential (DC)	Occupational (DC)	Construction Worker (DC)	Excavation Worker (DC)
Area of the Site	Pile of soil from SOU construction	Area proposed for soil cell	Veneer mill - east	Veneer Mill south	Maintenance Shop - north	Maintenance Shop - East	North Landfill Area	North Landfill Area				
Reason for Sampling	Original Soil Sampling											
NWTPH- Gx, Dx (mg/Kg)												
gasoline (GRO)	ND	ND							1200	20000	9700	> Max
Diesel (DRO)	ND	ND	56		280	62	48 U H	49 U H	1100	14000	4600	> Max
heavy oil (RRO)	ND	570	350		2200	360	41 J H	49 U H	1100	14000	4600	> Max
RCRA 8 Metals (mg/Kg)												
Silver					0.72 U	0.67 U	0.75 U	0.73 U	390	5800	1800	49000
Arsenic	3.9				2.2	2.3	4.9	2.3	0.43	1.9	15	420
Barium					57	49	200	81	15,000	220,000	69,000	>Max
Cadmium					0.13 J	0.11 J	0.045 J	0.37 U	78	1100	350	9700
Total Chromium					14 B	21 B	31 B	20 B	---	---	---	---
Lead	16		9.5		20	20	9.4	3.4	400	800	800	800
Selenium					1.3 U	1.2 U	1.3 U	1.3 U	---	---	---	---
Total Mercury				0.05	0.049	0.043	0.057	0.019	23	350	110	2900
PAHs (µg/Kg)												
2-Methylnaphthalene			16		14	8.2 J	1 J	10 U	---	---	---	---
Acenaphthene			6.6 J		2.8 J	6.3 J	9.9 U	10 U	4,700,000	70,000,000	21,000,000	590,000,000
Acenaphthylene			9.9 U		3.3 J	3.3 J	9.9 U	10 U	---	---	---	---
Benzo[a]anthracene			1.8 J		8.5 J	140	2.7 J	10 U	---	---	---	---
Benzo[a]pyrene			9.9 U		8.4 J	160	2.6 J	10 U	110	2100	>Csat	>Csat
Benzo[b]fluoranthene			9.9 U		15	210	4.7 J	10 U	1100	21000	>Csat	>Csat
Benzo[g,h,i]perylene			9.9 U		13	92	2.5 J	10 U	---	---	---	---
Benzo[k]fluoranthene			9.9 U		3.5 J	76	9.9 U	10 U	>Csat	>Csat	>Csat	>Csat
Chrysene			3.7 J		17	170	4 U	10 U	>Csat	>Csat	>Csat	>Csat
Dibenz[a,h]anthracene			9.9 U		10 U	29	9.9 U	10 U	110	2,100	>Csat	>Csat
Fluoranthene			14		17	180	4.5 J	10 U	>Csat	>Csat	>Csat	>Csat
Fluorene			4.5 J		10 U	8.2 J	9.9 U	10 U	>Csat	>Csat	>Csat	>Csat
Indeno[1,2,3-cd]pyrene			9.9 U		8.9 J	97	9.9 U	10 U	1,100	21,000	>Csat	>Csat
Naphthalene			10		8 J	17	1.8 J	1.1 J	5,300	23,000	>Csat	>Csat
Phenanthrene			26		20	78	3.4 J	10 U	---	---	---	---
Pyrene			8.9 J		24	180	3.9 J	10 U	>Csat	>Csat	>Csat	>Csat
Anthracene			9.9 U		8 J	21	9.9 U	10 U	>Csat	>Csat	>Csat	>Max
1-Methylnaphthalene			7.9 J		6.6 J	4 J	0.62 J	10 U	---	---	---	---
PCBs (µg/Kg)												
total PCBs			40 J	92U/64U	91U/64U	90U/63U	87U /61U	92U/65U	230	590	>Csat	>Csat
SVOCs (µg/Kg)												
Remaining SVOCs												
Pentachlorophenol												
Trichlorophenol												
Dioxins and Furans (pg/g)												
2,3,7,8-TCDD equivalent (2005)	6.19	66.04							4.7	16	170	4800

Samples represent soils that have been removed.
 April 2025 Confirmation Sampling
 June 2025 Perimeter Sampling
 Analyses not performed
Bold indicated above RBC and still present onsite.

DC = dermal contact, inhalation, ingestion