



November 21, 2025

Project No. M1448.01.001

David Lamadrid

Oregon Department of Environmental Quality

700 NE Multnomah Street, Suite 600

Portland, Oregon 97232

Re: Cleanup Program No. 3389 - The Pickle Factory - Former Transformer Storage and Quench Tank Sampling Report

Dear David Lamadrid:

On October 3, 2025, Maul Foster & Alongi, Inc. (MFA) conducted additional sampling activities at the Pickle Factory located at 866 North Columbia Boulevard in Portland, Oregon (the Site) (Figure 1). The investigation activities were requested in a 2020 letter from the Oregon Department of Environmental Quality (DEQ) (Attachment A). In September 2025, MFA prepared a work plan to address this request¹. DEQ provided comments on the work plan (Attachment A), which were incorporated into the final sampling approach described below.

Background

Property Location, History, and Description

The Site is located at 866 North Columbia Boulevard in Portland, Oregon (see Figure 1) in Section 10, Township 1 North, Range 1 East of the Willamette Meridian. The Site comprises approximately 5.3 acres of industrial land with four buildings and a paved employee parking lot and driveways (see Figure 2). Most tenants participate in creative or office-related work. Other uses include engineering extraction equipment, roofing, cabinet building, woodworking, and glass art.

Site Investigation Activities

The scope of work for the site investigation was developed based on a site visit and communications with the DEQ project manager and included the following activities.

- Collection of surface soil samples at the former transformer storage area
- Collection of slag material sample from the former quench tank

This section presents the scope of work that was conducted in accordance with the work plan.

¹ MFA, 2025. Technical Memorandum, The Pickle Factory – Former Transformer and Quench Tank Sampling Work Plan. Maul Foster & Alongi, Inc., Portland, OR. September 19.

Preparatory Activities

Site Health and Safety Plan. MFA prepared a site-specific HASP for its personnel involved with the project. The HASP was prepared in general accordance with the Occupational Safety and Health Act and the Oregon Administrative Rules. A copy of the HASP was maintained on site for use by MFA staff during the field activities.

Assessment Activities

Former Transformer Storage Area

Historically, transformers were stored in the southeast corner of the Site (Figure 3). The ground surface in this area slopes north to catch basin CB9 and ultimately drains to the Columbia Slough. This area consists of a degraded asphalt surface with an overlying mantle of loose soil and gravel. For this report, this material is referred to as “soil” and is the subject of this assessment, since polychlorinated biphenyls (PCBs) may have adhered to the soil. To assess whether PCBs were released, one composite surface soil sample was collected using a new, nylon-fiber brush to sweep fine soil material from the former transformer storage area directly into the sample container. Material was collected from multiple locations across the area and composited into a single sample. To the extent possible, large gravel and debris were excluded from the sample. The composite sample was submitted to the laboratory and analyzed for PCBs by U.S. Environmental Protection Agency (EPA) Method 8082A.

To assess whether PCBs were released to soil directly underlying the asphalt, five discrete soil samples were collected from potholes, cracks, and other features of degraded asphalt within the area outlined in Figure 3. Soil was collected using stainless steel hand trowels. A photograph log is included in Attachment B. The discrete samples were submitted to the laboratory and analyzed for PCBs by EPA Method 8082A.

Former Quench Tank

The former quench tank is a 4-feet-wide by 8-feet-long rectangular concrete structure located in the southeast corner of the Site (Figures 2 and 3). The approximate thickness of the slag material was estimated to be approximately 1.5 feet during sample collection by advancing a hand auger through the slag until refusal was met (which is presumed to be the concrete bottom of the structure). The approximate depth of the concrete bottom of the quench tank is 10 feet. Using the hand auger, one grab sample was collected from the slag material at the bottom of the quench tank (Attachment B). The sample was submitted to the laboratory and analyzed for diesel- and oil-range petroleum hydrocarbons by Northwest Method NWTPH-Dx, priority pollutant (PP) 13 metals (antimony, arsenic, beryllium, cadmium, chromium, copper, lead, mercury, nickel, selenium, silver, thallium, and zinc) by EPA Method 6020B and 7471B, and the Toxicity Characteristic Leaching Procedure (TCLP) for chromium by EPA Method EPA 1311/6020B.

Analytical Results

Surface soil and slag samples collected from the above activities were submitted to Apex Laboratories, in Tigard, Oregon, for chemical analysis. Copies of the laboratory reports are included in Attachment C. MFA prepared a data validation memorandum (DVM) included in Attachment D. Apex Laboratories flagged several EPA Method 8082A results as estimated due to the presence of multiple PCB Aroclors and/or PCB congeners not defined as Aroclors. The reviewer confirmed with the laboratory that the Aroclors were quantitated based on the closest matching Aroclor; the Aroclor

chromatograms may be impacted by weathering in the samples and/or interference from other PCB Aroclors or congeners. The data are presented in Tables 1 and 2.

The former transformer storage area sample results were compared to DEQ's Lower Columbia Slough Screening Levels as well as applicable DEQ Risk-Based concentrations (RBCs). The former quench tank sample results were compared to DEQ Clean Fill Criteria² and the Maximum Concentration of Contaminants for the Toxicity Characteristic under the Code of Federal Regulations (CFR) 261.24³ to determine handling and disposal options.

The laboratory analytical results are summarized below along with regulatory screening.

Former Transformer Storage Area

- **PCBs.** Aroclors 1254 and 1260 were detected at low-level concentrations, just slightly above the method reporting limit (MRL). DEQ's Lower Columbia Slough Screening Levels for these Aroclors are set right at the MRL and therefore Aroclors 1254 and 1260 slightly exceeded the DEQ Lower Columbia Slough Screening Levels. Total PCBs did not exceed DEQ RBCs for direct contact exposure by occupational, construction, and excavation workers.

Former Quench Tank

- **NWTPH-Dx.** Diesel- and oil-range petroleum hydrocarbons were not detected above the MRLs.
- **Priority Pollutant 13 Metals.** Antimony, chromium, copper, lead, and nickel were detected at concentrations exceeding the DEQ Clean Fill Criteria. Chromium was detected at a concentration with the potential to exhibit the characteristics of a hazardous waste and therefore the quench tank sample was also analyzed for TCLP chromium.
- **TCLP for Chromium.** Chromium did not exceed the EPA Toxicity Characteristic Regulatory Level.

Conclusions and Recommendations

Former Transformer Storage Area. Surface composite and discrete soil samples were collected from the mantle of loose soil overlying the asphalt and the soil directly under the asphalt of the former transformer storage area. Total PCBs did not exceed the RBCs for direct contact exposure by occupational, construction, and excavation workers in the composite or discrete samples across the sampled area.

Aroclors 1254 and 1260 were detected at maximum estimated concentrations of 0.0169 milligrams per kilogram (mg/kg) and 0.0127 mg/kg, respectively, and the screening levels are 0.01 mg/kg. In DEQ's 2020 letter (Attachment A) it states *"On August 27, 2020, DEQ's contractor performed a composite Columbia Slough sediment sampling at outfall 62, where stormwater from your facility discharges. PCB congener laboratory results were 5 mg/kg. This represents a significant increase from 2009 sediment samples (Columbia Slough Sediment Study. 2012, Prepared by DEQ), which PCB congeners were 0.9 mg/kg."*

Comparison between total PCB concentrations derived from Aroclor analysis and those obtained through congener-specific analysis is necessary to provide context between the upland and in-water data sets. While both approaches aim to quantify overall PCB presence, they differ in methodology and scope. Therefore, our comparison between the data sets is considered more qualitative. Regardless, the PCB concentrations detected at the Site do not constitute a significant release and

² <https://www.oregon.gov/deq/Filtered%20Library/IMDcleanfill.pdf>

³ [eCFR :: 40 CFR 261.24 – Toxicity characteristic.](#)

are orders of magnitude less than the concentrations at outfall 62. Therefore, it does not appear there was a release of PCBs from the site to the Columbia Slough.

Former Quench Tank. One grab sample was collected from the slag material inside the former quench tank. Diesel- and oil-range petroleum hydrocarbons were not detected above the MRLs. Five of the analyzed PP13 metals were detected in the slag material at concentrations exceeding the DEQ Clean Fill Criteria.

Recommendations. MFA recommends the following based on the data collected:

- No further assessment is necessary in the former transformer storage area.
- The slag material inside the quench tank does not meet clean fill criteria. It is recommended that the slag material be removed from the quench tank and disposed of at a Subtitle D waste facility.

Sincerely,

Maul Foster & Alongi, Inc.

Merideth D'Andrea, RG
Principal Geologist

Attachments

Limitations

Figures

Tables

A—DEQ Correspondence

B— Photograph Log

C— Laboratory Analytical Data Report

D— Data Validation Memorandum

Limitations

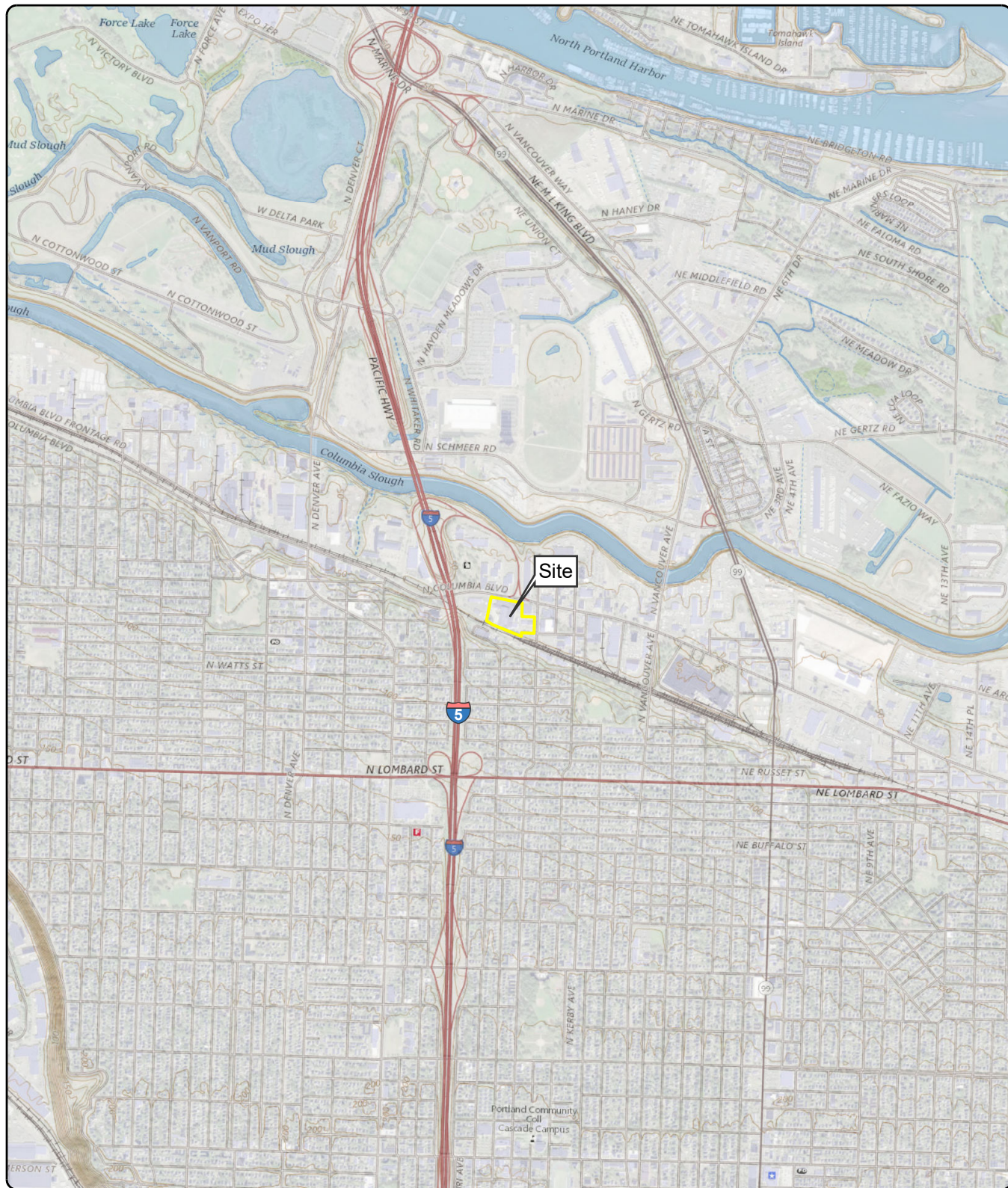
The services undertaken in completing this report were performed consistent with generally accepted professional consulting principles and practices. No other warranty, express or implied, is made. These services were performed consistent with our agreement with our client. This report is solely for the use and information of our client unless otherwise noted. Any reliance on this report by a third party is at such party's sole risk.

Opinions and recommendations contained in this report apply to conditions existing when services were performed and are intended only for the client, purposes, locations, time frames, and project parameters indicated. We are not responsible for the impacts of any changes in environmental standards, practices, or regulations subsequent to performance of services. We do not warrant the accuracy of information supplied by others, or the use of segregated portions of this report.

Figures



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Note
 Site Address: 866 N Columbia Blvd, Portland, Oregon
 US Geological Survey (2020) 7.5-minute
 topographic quadrangle: Portland
 Section 10, Township 1 North, Range 1 East

Data Source
 Property boundary obtained from Multnomah County.



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 p. 971 544 2139 | www.maulfooster.com

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Legend

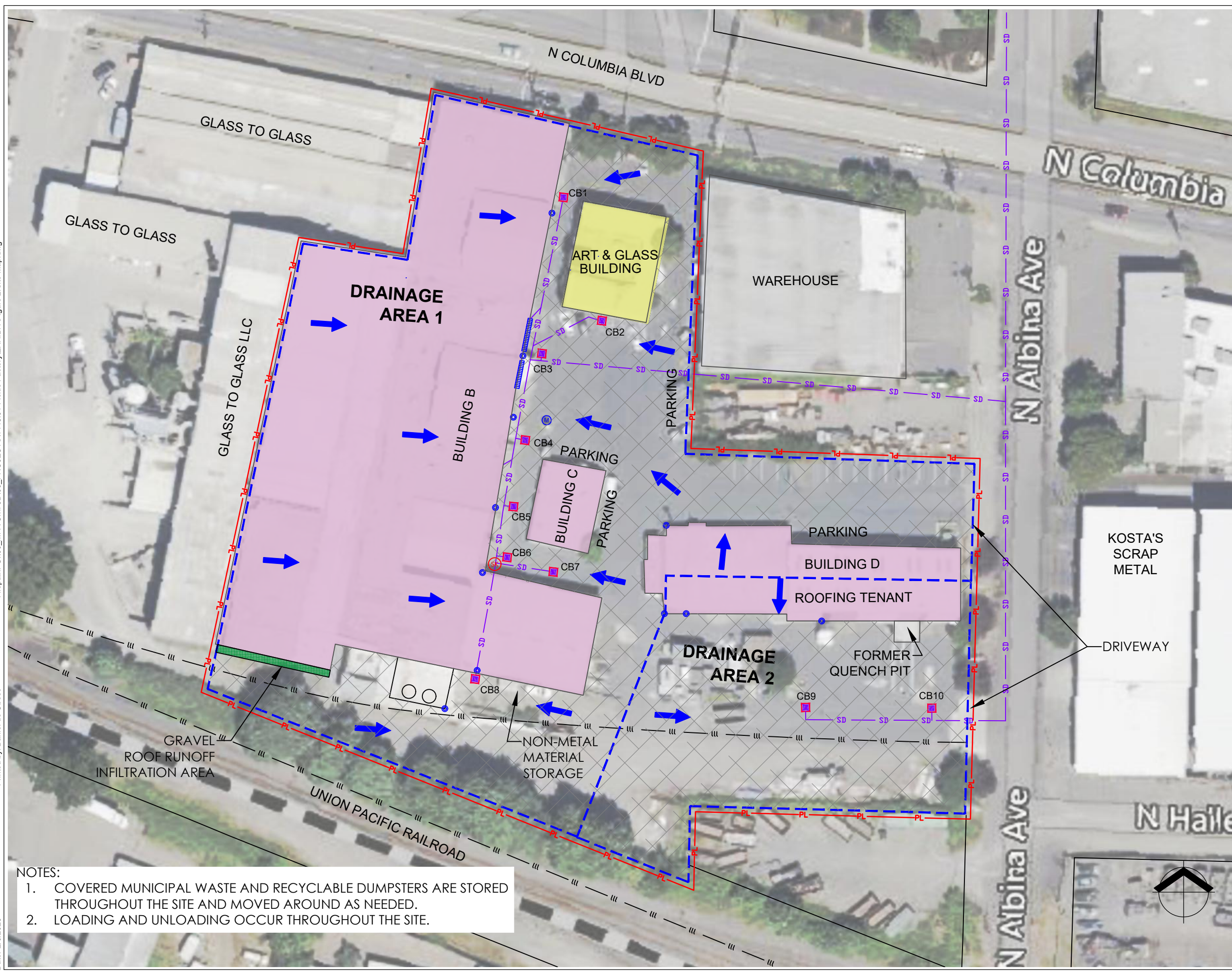
 Site Tax Lot

Figure 1 Site Location

The Pickle Factory, LLC
 Portland, OR

0 1,000 2,000
 Feet



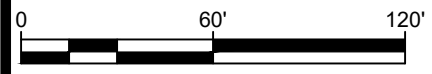


- NOTES:
1. COVERED MUNICIPAL WASTE AND RECYCLABLE DUMPSTERS ARE STORED THROUGHOUT THE SITE AND MOVED AROUND AS NEEDED.
 2. LOADING AND UNLOADING OCCUR THROUGHOUT THE SITE.

This figure prepared as supplemental visual information only and should not be used for construction purposes. Only plan sheets approved, stamped and signed by a registered professional engineer in the state of governing jurisdiction shall be used for construction. Additionally, only plans approved by the applicable governing jurisdiction(s) shall be used for final construction unless otherwise expressly noted in writing by the engineer of record.

LEGEND

- PL — PROPERTY LINE
- - - DRAINAGE AREA BOUNDARY
- SD — STORM PIPE
- SK SPILL KIT
- CATCH BASIN WITH FILTER FABRIC INSERT
- ⊙ DOWNSPOUT
- ➔ FLOW DIRECTION
- Ⓜ MANHOLE
- ASPHALT
- PERVIOUS AREA
- SILICON ROOF COATING
- VINYL ROOF



NOTE: BAR IS ONE INCH ON ORIGINAL DRAWING. IF NOT ONE INCH ON THIS SHEET, ADJUST SCALE ACCORDINGLY.

Figure 2
Site Map

The Pickle Factory
Portland, Oregon

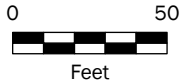


Figure 3
Sample Locations

The Pickle Factory, LLC
866 North Columbia Boulevard
Portland, OR

Legend

- Discrete Slag Sample
- Discrete Soil Sample
- Former Transformer Storage Area
- Property Boundary
- Tax lot



Data Sources
Aerial photograph (2024) obtained from the City of Portland;
tax lot data obtained from Oregon Metro.



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Tables



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Table 1
Soil Analytical Results
The Pickle Factory, Portland, Oregon



Location:	RBC, Soil Ingestion, Dermal Contact, and Inhalation ⁽¹⁾			DEQ, Lower Columbia Slough Screening Levels ⁽²⁾	Former Transformer Storage Area					
Sample Name:					FTSA-01	FTSA-02	FTSA-03	FTSA-04	FTSA-05	FTSA-SS-COMP
Collection Date:	Occupational	Construction Worker	Excavation Worker	Upland Source Control	10/03/2025	10/03/2025	10/03/2025	10/03/2025	10/03/2025	10/03/2025
PCB Aroclors (mg/kg)										
Aroclor 1016	NV	NV	NV	NV	0.0111 U	0.00916 U	0.00964 U	0.00931 U	0.00965 U	0.00926 U
Aroclor 1221	NV	NV	NV	NV	0.0111 U	0.00916 U	0.00964 U	0.00931 U	0.00965 U	0.00926 U
Aroclor 1232	NV	NV	NV	NV	0.0111 U	0.00916 U	0.00964 U	0.00931 U	0.00965 U	0.00926 U
Aroclor 1242	NV	NV	NV	NV	0.0111 U	0.00916 U	0.00964 U	0.00931 U	0.00965 U	0.00926 U
Aroclor 1248	NV	NV	NV	0.01	0.0111 U	0.00916 U	0.00964 U	0.00931 U	0.00965 U	0.00926 U
Aroclor 1254	NV	NV	NV	0.01	0.0149 J	0.0120 J	0.0118 J	0.00931 U	0.0169 J	0.0106 J
Aroclor 1260	NV	NV	NV	0.01	0.0127 J	0.0106 J	0.00964 U	0.00931 U	0.00965 U	0.00926 U
Total PCBs ^(a)	0.59	4.9	140	NV	0.0276 JT	0.0226 JT	0.0118 JT	0.00931 U	0.0169 JT	0.0106 JT
Notes Shading (color key below) indicates values that exceed screening criteria; non-detects (U) were not compared with screening criteria. DEQ, Lower Columbia Slough Screening Levels, Upland Source Control DEQ = Oregon Department of Environmental Quality. J = result is estimated. mg/kg = milligrams per kilogram. NV = no value. PCB = polychlorinated biphenyl. RBC = risk-based concentration. T = result is calculated. U = result is non-detect at the method reporting limit. ^(a) Total PCBs is the sum of all PCB Aroclors. Non-detect results are not included in the sum. When all results are non-detect, the highest reporting limit is presented as the sum.										
References ⁽¹⁾ DEQ. 2023. Table: <i>Risk-Based Concentrations for Individual Chemicals</i> . Oregon Department of Environmental Quality, Environmental Cleanup Program. August. ⁽²⁾ DEQ. 2014. Table: <i>Lower Columbia Slough Screening Levels</i> . Oregon Department of Environmental Quality, Environmental Cleanup Program. June 3.										

Table 2
Slag Analytical Results
The Pickle Factory, Portland, Oregon



Location:	DEQ Upland Clean Fill, Portland Basin ^{(a)(1)}	EPA Toxicity Characteristic Regulatory Level ^(b)	Quench Tank
Sample Name:			QT-SLAG
Collection Date:			10/03/2025
TPH (mg/kg)			
Diesel-range organics	1,100	NV	1.8 UJ
Residual-range hydrocarbons	1,100 ^(c)	NV	100 U
Total Metals (mg/kg)			
Antimony	0.56	NV	0.57
Arsenic	8.8	NV	3.83
Beryllium	2	NV	0.008 J
Cadmium	0.63	NV	0.085
Chromium	76	NV	215
Copper	34	NV	457
Lead	28	NV	45.7
Nickel	47	NV	2,770
Mercury	0.23	NV	0.002 U
Selenium	0.71	NV	0.11 J
Silver	0.82	NV	0.071
Thallium	5.2	NV	0.011 U
Zinc	180	NV	136
TCLP Metals (mg/L)			
Chromium	NV	5.0	0.111
Notes			
Shading (color key below) indicates values that exceed screening criteria; non-detects (U) were not compared with screening criteria.			
DEQ Upland Clean Fill, Portland Basin			
DEQ = Oregon Department of Environmental Quality.			
J = result is estimated.			
mg/kg = milligrams per kilogram.			
mg/L = milligrams per liter.			
NV = no value.			
TCLP = toxicity characteristic leaching procedure.			
TPH = total petroleum hydrocarbons.			
U = result is non-detect at the method detection limit or method reporting limit.			
UJ = result is non-detect with an estimated method detection limit.			
^(a) The Portland Basin geographic area applies to the clean fill criteria for metals only.			
^(b) Toxicity characteristic regulatory limit from Table 1 of U.S. 40 Code of Federal Regulations part 261.24.			
^(c) Value is for generic diesel/heating oil, since a generic residual-range hydrocarbons value is not available.			
Reference			
⁽¹⁾ DEQ. 2019. <i>Clean Fill Determinations</i> , Tables 1 and 2. Oregon Department of Environmental Quality, Materials Management, Portland, Oregon. February.			

Attachment A

DEQ Correspondence



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Oregon

Tina Kotek, Governor

Department of Environmental Quality

Northwest Region

700 NE Multnomah Street, Suite 600

Portland, OR 97232

(503) 229-5263

FAX (503) 229-6945

TTY 711

September 26, 2025

sent via email delivery only

Dylan Farwell, CPM
NAI Elliott
901 NE Glisan Street
Suite 200
Portland, OR 97232

RE: Former Transformer and Quench Tank Sampling Work Plan
CARCO/Pickle Factory
Portland, Oregon
Cleanup Program No. 3389

Dear Dylan Farwell:

This letter provides Oregon Department of Environmental Quality (DEQ) review comments of a Technical Memorandum titled *The Pickle Factory – Former Transformer and Quench Tank Sampling Work Plan* (Work Plan) for The Pickle Factory property located at 866 North Columbia Boulevard in Portland, Oregon (Site). The Work Plan was prepared on your behalf by Maul Foster & Alongi, Inc. (MFA) and dated September 19, 2025. DEQ agrees with the overall approach for additional investigation to further evaluate the former transformer storage area and unused quench tank; however, some modifications to the scope of work are requested as described below.

Former Transformer Storage Area

1. It is uncertain if the existing mantle of sand and gravel over the degraded asphalt surface is representative of the materials that were present in 2020. Additionally, depending on the condition of the degraded asphalt (the photo in Figure 3 shows shallow potholes), a release of transformer oil could potentially have seeped to soil underlying the asphalt. DEQ requests that, in addition to a composite sample of mantle material overlying the degraded asphalt, five discreet soil samples be collected directly below the asphalt within the area shown in Figure 3 for laboratory analysis, focusing on potholes and other areas showing suspect asphalt integrity.
2. Compare total polychlorinated biphenyls (PCBs) concentrations to risk-based concentration (RBC) screening values for direct contact exposure by occupational, construction, and excavation workers.
3. DEQ has not received transformer disposal receipts, as requested in DEQ letters dated November 17, 2020, and February 14, 2024. Please make a concerted effort to find and submit to DEQ the requested documentation.

Quench Tank

4. If the quench tank is not concrete lined, an additional sample of soil below the slag material must be collected for laboratory analyses.
5. Please analyze the sample(s) for priority pollutant 13 metals to evaluate concentrations of copper, nickel, and zinc that could have been present in metal alloys or coatings.

If you have questions or comments about this letter, please contact me by phone at (503) 501-0669 or by e-mail at david.lamadrid@deq.oregon.gov. DEQ looks forward to working with you on this project.

Sincerely,

A handwritten signature in blue ink, appearing to read "David Lamadrid".

David Lamadrid
Project Manager
Northwest Region Cleanup Program

cc: Merideth D'Andrea, MFA
Cleanup File No. 3389



Oregon

Kate Brown, Governor

Department of Environmental Quality

Northwest Region

700 NE Multnomah Street, Suite 600

Portland, OR 97232

(503) 229-5263

FAX (503) 229-6945

TTY 711

November 17, 2020

via electronic mail

DAVID GOLD
THE PICKLE FACTORY LLC
412 NW COUCH ST STE 220
PORTLAND OR 97209

Re: CARCO Varicast Facilities
ECSI File No. 3389

Dear Mr. Gold:

The Department of Environmental Quality has received a request to close the Prospective Purchaser's Agreement from your consultant Maul, Foster, and Alongi. Based on the PPA, you are required to submit a PPA completion letter. MFA is working on its PPA completion letter and DEQ should be able to finish the PPA completion letter after it is submitted, we review it, and perform a public notice. DEQ was copied on a January 30, 2020, Portland Bureau of Environmental Services letter documenting their inspection. After DEQ review, several BES inspection items were identified as additions to PPA reporting requirements and identified additional cleanup items, which are outside the scope of the PPA. While the PPA is on par to completion, there some additional cleanup items to address. Those are as follows:

Additional Cleanup Items:

- Three onsite transformers were decommissioned (with PCB labelling) on October 15, 2019. BES found transformers stored in the SE corner of site in an uncovered location with a potential pathway to catch basins (V9 and V10) with filters (condition unknown) which are directed to N. Albina St. and ultimately the Columbia Slough. According to BES, one of the transformer lids did not appear to be secured. Transformers were removed from the site on February 6, 2020. Transformer disposal report was requested but has not yet been submitted to DEQ. As discussed in a March 5, 2020 email, BES has a partial lab report that indicates transformer showing 10 mg/kg PCB Aroclor 1260 in each of the three transformers. It is unknown how long the transformers were stored in the uncovered location or if fluid remained inside during storage, etc.

On August 27, 2020, DEQ's contractor performed a composite Columbia Slough sediment sampling at outfall 62, where stormwater from your facility discharges. PCB congener laboratory results were 5 mg/kg. This represents a significant increase from 2009 sediment samples ([Columbia Slough Sediment Study. 2012, Prepared by DEQ](#)), which PCB congeners were 0.9 mg/kg. Please indicate how the transformers were disposed and what future sampling will occur to demonstrate there were no PCB releases from stored transformers to the Columbia Slough (wipe sampling, subsurface sampling, depending what the surface is and its condition).

- A slag material is located in the quench tank area in the southeast portion of the property. A photo from the City shows slag in a trench. We know nothing about the depth of this slag in the tank, source of material, whether or not there is any base to the tank (e.g. concrete, asphalt, or just dirt). Further investigation and probably removal of the slag should occur.

Items that can be completed as part of PPA reporting and completion:

- The January 2020 BES inspection photos documented some demo debris (including asphalt, photo attached). Please remember that owner/tenants per the EES Section 3.2, need to notify DEQ in advance if you intend to disturb onsite caps. Please indicate from where demo material came and if improvement work took place in areas with existing site caps and, if so, determine if the caps were adequately replaced.
- Recent roof coating (adjustment to PPA, eventually). DEQ understands you want to adjust the PPA by relying on the newly applied roof coating as a protective measure and removing the downspout filters. That may be acceptable, but DEQ needs to know which roofs will be coated and demonstrate the coating material causes no adverse environmental issues and particularly for the Columbia Slough. Also, you would need to add that change to the CMMP and maintain the coating on the roof.

For the PPA items, we recommend completing that work under the existing PPA agreement. Please note the PPA does not provide a purchaser with liability protection for any new contamination releases that occur after the purchaser acquires the property or if items are not maintained and a release occurs from improper management. DEQ recommends that these newly discovered items be addressed right away. For the newly discovered items, we can either complete that under the existing agreement with your acceptance or we will need to develop a voluntary cleanup agreement that will require your signature. If you have any questions, please call me at (503) 229-5617 or via email at Robert.hood@state.or.us.

Respectfully,



Robert A. Hood, Jr.
Project Manager
NW Region Cleanup and Tanks

Attachments: -Asphalt Debris Photo

cc: -Administrative File
 -MFA-Merideth D'Andrea
 -DEQ-Sarah Miller

(rah:RAH)

Attachment B

Photograph Log



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Photographs

Project Name: The Pickle Factory
Project Number: M1448.01.001
Location: 866 North Columbia Boulevard, Portland, Oregon

Photo No. 1.

Description

Photo showing the former transformer storage area looking north.



Photo No. 2.

Description

Photo showing FTSA-01 sample location. The sample was collected from a pothole in the former transformer storage area.



Photographs

Project Name: The Pickle Factory
Project Number: M1448.01.001
Location: 866 North Columbia Boulevard, Portland, Oregon

Photo No. 3.

Description

Photo showing the interior of the quench tank taken from the south perimeter wall.



Photo No. 4.

Description

Photo showing QT-SLAG hand auger sample location from the southwest corner of the quench tank.



Attachment C

Laboratory Analytical Data Reports



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ANALYTICAL REPORT

Apex Laboratories, LLC

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

Monday, November 3, 2025

Connor Anderson
Maul Foster & Alongi, INC.
3140 NE Broadway Street
Portland, OR 97232

RE: A5J1150 - Pickle Factory - 1448.01.01

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 A5J1150, which was received by the laboratory on 10/3/2025 at 2:12:00PM.

If you have any questions concerning this report or the services we offer, please feel free to contact me by email at: pnerenberg@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	
<u>Acceptable Receipt Temperature is less than, or equal to, 6 degC (not frozen), or received on ice the same day as sampling.</u>	
(See Cooler Receipt Form for details)	
Default Cooler	<u>1.6 degC</u>

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

Philip Nerenberg

Philip Nerenberg, Lab Director

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.



ANALYTICAL REPORT

Apex Laboratories, LLC

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

Maul Foster & Alongi, INC.

3140 NE Broadway Street
Portland, OR 97232

Project: **Pickle Factory**

Project Number: **1448.01.01**

Project Manager: **Connor Anderson**

Report ID:

A5J1150 - 11 03 25 1310

ANALYTICAL REPORT FOR SAMPLES

SAMPLE INFORMATION

Client Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
FTSA-SS-COMP	A5J1150-01	Soil	10/03/25 09:45	10/03/25 14:12
FTSA-01	A5J1150-02	Soil	10/03/25 09:55	10/03/25 14:12
FTSA-02	A5J1150-03	Soil	10/03/25 10:05	10/03/25 14:12
FTSA-03	A5J1150-04	Soil	10/03/25 10:15	10/03/25 14:12
FTSA-04	A5J1150-05	Soil	10/03/25 10:25	10/03/25 14:12
FTSA-05	A5J1150-06	Soil	10/03/25 10:35	10/03/25 14:12
QT-SLAG	A5J1150-07	Solid	10/03/25 11:00	10/03/25 14:12

Apex Laboratories

Philip Nerenberg, Lab Director

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.



ANALYTICAL REPORT

Apex Laboratories, LLC

6700 S.W. Sandburg Street

Tigard, OR 97223

503-718-2323

ORELAP ID: OR100062

Maul Foster & Alongi, INC.

3140 NE Broadway Street

Portland, OR 97232

Project: Pickle Factory

Project Number: 1448.01.01

Project Manager: Connor Anderson

Report ID:

A5J1150 - 11 03 25 1310

ANALYTICAL SAMPLE RESULTS

Polychlorinated Biphenyls by EPA 8082A

Analyte	Sample Result	Detection Limit	Reporting Limit	Units	Dilution	Date Analyzed	Method Ref.	Notes
FTSA-SS-COMP (A5J1150-01RE2)				Matrix: Soil		Batch: 25J0533		C-07
Aroclor 1016	ND	---	9.26	ug/kg dry	1	10/16/25 19:07	EPA 8082A	
Aroclor 1221	ND	---	9.26	ug/kg dry	1	10/16/25 19:07	EPA 8082A	
Aroclor 1232	ND	---	9.26	ug/kg dry	1	10/16/25 19:07	EPA 8082A	
Aroclor 1242	ND	---	9.26	ug/kg dry	1	10/16/25 19:07	EPA 8082A	
Aroclor 1248	ND	---	9.26	ug/kg dry	1	10/16/25 19:07	EPA 8082A	
Aroclor 1254	10.6	---	9.26	ug/kg dry	1	10/16/25 19:07	EPA 8082A	P-12
Aroclor 1260	ND	---	9.26	ug/kg dry	1	10/16/25 19:07	EPA 8082A	
<i>Surrogate: Decachlorobiphenyl (Surr)</i>		<i>Recovery: 92 %</i>		<i>Limits: 60-125 %</i>	<i>1</i>	<i>10/16/25 19:07</i>	<i>EPA 8082A</i>	
FTSA-01 (A5J1150-02RE2)				Matrix: Soil		Batch: 25J0533		C-07
Aroclor 1016	ND	---	11.1	ug/kg dry	1	10/16/25 20:00	EPA 8082A	
Aroclor 1221	ND	---	11.1	ug/kg dry	1	10/16/25 20:00	EPA 8082A	
Aroclor 1232	ND	---	11.1	ug/kg dry	1	10/16/25 20:00	EPA 8082A	
Aroclor 1242	ND	---	11.1	ug/kg dry	1	10/16/25 20:00	EPA 8082A	
Aroclor 1248	ND	---	11.1	ug/kg dry	1	10/16/25 20:00	EPA 8082A	
Aroclor 1254	14.9	---	11.1	ug/kg dry	1	10/16/25 20:00	EPA 8082A	P-12
Aroclor 1260	12.7	---	11.1	ug/kg dry	1	10/16/25 20:00	EPA 8082A	P-12
<i>Surrogate: Decachlorobiphenyl (Surr)</i>		<i>Recovery: 85 %</i>		<i>Limits: 60-125 %</i>	<i>1</i>	<i>10/16/25 20:00</i>	<i>EPA 8082A</i>	
FTSA-02 (A5J1150-03RE2)				Matrix: Soil		Batch: 25J0533		C-07
Aroclor 1016	ND	---	9.16	ug/kg dry	1	10/16/25 20:53	EPA 8082A	
Aroclor 1221	ND	---	9.16	ug/kg dry	1	10/16/25 20:53	EPA 8082A	
Aroclor 1232	ND	---	9.16	ug/kg dry	1	10/16/25 20:53	EPA 8082A	
Aroclor 1242	ND	---	9.16	ug/kg dry	1	10/16/25 20:53	EPA 8082A	
Aroclor 1248	ND	---	9.16	ug/kg dry	1	10/16/25 20:53	EPA 8082A	
Aroclor 1254	12.0	---	9.16	ug/kg dry	1	10/16/25 20:53	EPA 8082A	P-12
Aroclor 1260	10.6	---	9.16	ug/kg dry	1	10/16/25 20:53	EPA 8082A	P-12
<i>Surrogate: Decachlorobiphenyl (Surr)</i>		<i>Recovery: 76 %</i>		<i>Limits: 60-125 %</i>	<i>1</i>	<i>10/16/25 20:53</i>	<i>EPA 8082A</i>	
FTSA-03 (A5J1150-04RE1)				Matrix: Soil		Batch: 25J0533		C-07
Aroclor 1016	ND	---	9.64	ug/kg dry	1	10/16/25 12:24	EPA 8082A	
Aroclor 1221	ND	---	9.64	ug/kg dry	1	10/16/25 12:24	EPA 8082A	
Aroclor 1232	ND	---	9.64	ug/kg dry	1	10/16/25 12:24	EPA 8082A	
Aroclor 1242	ND	---	9.64	ug/kg dry	1	10/16/25 12:24	EPA 8082A	

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ANALYTICAL REPORT

Apex Laboratories, LLC

6700 S.W. Sandburg Street

Tigard, OR 97223

503-718-2323

ORELAP ID: OR100062

Maul Foster & Alongi, INC.

3140 NE Broadway Street

Portland, OR 97232

Project: Pickle Factory

Project Number: 1448.01.01

Project Manager: Connor Anderson

Report ID:

A5J1150 - 11 03 25 1310

ANALYTICAL SAMPLE RESULTS

Polychlorinated Biphenyls by EPA 8082A

Analyte	Sample Result	Detection Limit	Reporting Limit	Units	Dilution	Date Analyzed	Method Ref.	Notes
FTSA-03 (A5J1150-04RE1)				Matrix: Soil		Batch: 25J0533		C-07
Aroclor 1248	ND	---	9.64	ug/kg dry	1	10/16/25 12:24	EPA 8082A	
Aroclor 1254	11.8	---	9.64	ug/kg dry	1	10/16/25 12:24	EPA 8082A	P-12
Aroclor 1260	ND	---	9.64	ug/kg dry	1	10/16/25 12:24	EPA 8082A	
<i>Surrogate: Decachlorobiphenyl (Surr)</i>		<i>Recovery: 88 %</i>		<i>Limits: 60-125 %</i>	<i>1</i>	<i>10/16/25 12:24</i>	<i>EPA 8082A</i>	
FTSA-04 (A5J1150-05RE1)				Matrix: Soil		Batch: 25J0533		C-07
Aroclor 1016	ND	---	9.31	ug/kg dry	1	10/16/25 13:00	EPA 8082A	
Aroclor 1221	ND	---	9.31	ug/kg dry	1	10/16/25 13:00	EPA 8082A	
Aroclor 1232	ND	---	9.31	ug/kg dry	1	10/16/25 13:00	EPA 8082A	
Aroclor 1242	ND	---	9.31	ug/kg dry	1	10/16/25 13:00	EPA 8082A	
Aroclor 1248	ND	---	9.31	ug/kg dry	1	10/16/25 13:00	EPA 8082A	
Aroclor 1254	ND	---	9.31	ug/kg dry	1	10/16/25 13:00	EPA 8082A	
Aroclor 1260	ND	---	9.31	ug/kg dry	1	10/16/25 13:00	EPA 8082A	
<i>Surrogate: Decachlorobiphenyl (Surr)</i>		<i>Recovery: 88 %</i>		<i>Limits: 60-125 %</i>	<i>1</i>	<i>10/16/25 13:00</i>	<i>EPA 8082A</i>	
FTSA-05 (A5J1150-06RE1)				Matrix: Soil		Batch: 25J0533		C-07
Aroclor 1016	ND	---	9.65	ug/kg dry	1	10/16/25 13:35	EPA 8082A	
Aroclor 1221	ND	---	9.65	ug/kg dry	1	10/16/25 13:35	EPA 8082A	
Aroclor 1232	ND	---	9.65	ug/kg dry	1	10/16/25 13:35	EPA 8082A	
Aroclor 1242	ND	---	9.65	ug/kg dry	1	10/16/25 13:35	EPA 8082A	
Aroclor 1248	ND	---	9.65	ug/kg dry	1	10/16/25 13:35	EPA 8082A	
Aroclor 1254	16.9	---	9.65	ug/kg dry	1	10/16/25 13:35	EPA 8082A	P-12
Aroclor 1260	ND	---	9.65	ug/kg dry	1	10/16/25 13:35	EPA 8082A	
<i>Surrogate: Decachlorobiphenyl (Surr)</i>		<i>Recovery: 77 %</i>		<i>Limits: 60-125 %</i>	<i>1</i>	<i>10/16/25 13:35</i>	<i>EPA 8082A</i>	

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503-718-2323
ORELAP ID: OR100062**Maul Foster & Alongi, INC.**3140 NE Broadway Street
Portland, OR 97232Project: **Pickle Factory**Project Number: **1448.01.01**Project Manager: **Connor Anderson****Report ID:****A5J1150 - 11 03 25 1310****ANALYTICAL SAMPLE RESULTS****TCLP Metals by EPA 6020B (ICPMS)**

Analyte	Sample Result	Detection Limit	Reporting Limit	Units	Dilution	Date Analyzed	Method Ref.	Notes
QT-SLAG (A5J1150-07)				Matrix: Solid				
Batch: 25J1018								
Chromium	0.111	---	0.100	mg/L	10	10/29/25 21:59	1311/6020B	

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Project: Pickle Factory

Project Number: 1448.01.01

Project Manager: Connor Anderson

Report ID:

A5J1150 - 11 03 25 1310

ANALYTICAL SAMPLE RESULTS

Percent Dry Weight

Analyte	Sample Result	Detection Limit	Reporting Limit	Units	Dilution	Date Analyzed	Method Ref.	Notes
FTSA-SS-COMP (A5J1150-01)				Matrix: Soil		Batch: 25J0242		
% Solids	93.2	---	1.00	%	1	10/08/25 07:58	EPA 8000D	
FTSA-01 (A5J1150-02)				Matrix: Soil		Batch: 25J0242		
% Solids	81.7	---	1.00	%	1	10/08/25 07:58	EPA 8000D	
FTSA-02 (A5J1150-03)				Matrix: Soil		Batch: 25J0242		
% Solids	93.2	---	1.00	%	1	10/08/25 07:58	EPA 8000D	
FTSA-03 (A5J1150-04)				Matrix: Soil		Batch: 25J0242		
% Solids	92.1	---	1.00	%	1	10/08/25 07:58	EPA 8000D	
FTSA-04 (A5J1150-05)				Matrix: Soil		Batch: 25J0242		
% Solids	90.4	---	1.00	%	1	10/08/25 07:58	EPA 8000D	
FTSA-05 (A5J1150-06)				Matrix: Soil		Batch: 25J0242		
% Solids	88.5	---	1.00	%	1	10/08/25 07:58	EPA 8000D	

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Project Manager: Connor Anderson

Report ID:

A5J1150 - 11 03 25 1310

QUALITY CONTROL (QC) SAMPLE RESULTS

Polychlorinated Biphenyls by EPA 8082A

Analyte	Result	Detection Limit	Reporting Limit	Units	Dilution	Spike Amount	Source Result	% REC	% REC Limits	RPD	RPD Limit	Notes
Batch 25J0533 - EPA 3546						Soil						
Blank (25J0533-BLK1)			Prepared: 10/15/25 09:12 Analyzed: 10/15/25 19:15						C-07			
EPA 8082A												
Aroclor 1016	ND	---	10.0	ug/kg wet	1	---	---	---	---	---	---	
Aroclor 1221	ND	---	10.0	ug/kg wet	1	---	---	---	---	---	---	
Aroclor 1232	ND	---	10.0	ug/kg wet	1	---	---	---	---	---	---	
Aroclor 1242	ND	---	10.0	ug/kg wet	1	---	---	---	---	---	---	
Aroclor 1248	ND	---	10.0	ug/kg wet	1	---	---	---	---	---	---	
Aroclor 1254	ND	---	10.0	ug/kg wet	1	---	---	---	---	---	---	
Aroclor 1260	ND	---	10.0	ug/kg wet	1	---	---	---	---	---	---	
Surr: Decachlorobiphenyl (Surr)		Recovery: 96 %		Limits: 60-125 %		Dilution: 1x						
LCS (25J0533-BS1)			Prepared: 10/15/25 09:12 Analyzed: 10/15/25 19:32						C-07			
EPA 8082A												
Aroclor 1016	205	---	10.0	ug/kg wet	1	250	---	82	47-134%	---	---	
Aroclor 1260	222	---	10.0	ug/kg wet	1	250	---	89	53-140%	---	---	
Surr: Decachlorobiphenyl (Surr)		Recovery: 94 %		Limits: 60-125 %		Dilution: 1x						
Matrix Spike (25J0533-MS1)			Prepared: 10/15/25 09:12 Analyzed: 10/15/25 23:25						C-07			
QC Source Sample: Non-SDG (A5J1146-20)												
EPA 8082A												
Aroclor 1016	209	---	10.6	ug/kg dry	1	266	ND	79	47-134%	---	---	
Aroclor 1260	224	---	10.6	ug/kg dry	1	266	ND	84	53-140%	---	---	
Surr: Decachlorobiphenyl (Surr)		Recovery: 95 %		Limits: 60-125 %		Dilution: 1x						
Matrix Spike Dup (25J0533-MSD1)			Prepared: 10/15/25 09:12 Analyzed: 10/16/25 00:00						C-07			
QC Source Sample: Non-SDG (A5J1146-20)												
Aroclor 1016	204	---	10.2	ug/kg dry	1	256	ND	80	47-134%	3	30%	
Aroclor 1260	219	---	10.2	ug/kg dry	1	256	ND	85	53-140%	2	30%	
Surr: Decachlorobiphenyl (Surr)		Recovery: 95 %		Limits: 60-125 %		Dilution: 1x						

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Project Number: 1448.01.01

Project Manager: Connor Anderson

Report ID:

A5J1150 - 11 03 25 1310

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 25J1018 - EPA 1311/3015A						Soil						
Blank (25J1018-BLK1)			Prepared: 10/29/25 10:18 Analyzed: 10/29/25 21:37									
<u>1311/6020B</u>												
Chromium	ND	---	0.100	mg/L	10	---	---	---	---	---	---	TCLP
LCS (25J1018-BS1)			Prepared: 10/29/25 10:18 Analyzed: 10/29/25 21:54									
<u>1311/6020B</u>												
Chromium	4.97	---	0.100	mg/L	10	5.00	---	99	80-120%	---	---	TCLP
Duplicate (25J1018-DUP1)			Prepared: 10/29/25 10:18 Analyzed: 10/29/25 23:21									
<u>QC Source Sample: Non-SDG (A5J1782-08)</u>												
Chromium	ND	---	0.100	mg/L	10	---	ND	---	---	---	20%	CONT
Matrix Spike (25J1018-MS1)			Prepared: 10/29/25 10:18 Analyzed: 10/29/25 23:26									
<u>QC Source Sample: Non-SDG (A5J1782-08)</u>												
<u>1311/6020B</u>												
Chromium	4.98	---	0.100	mg/L	10	5.00	ND	100	50-150%	---	---	CONT
Matrix Spike (25J1018-MS2)			Prepared: 10/29/25 10:18 Analyzed: 10/29/25 22:21									
<u>QC Source Sample: Non-SDG (A5J1722-01)</u>												
<u>1311/6020B</u>												
Chromium	4.97	---	0.100	mg/L	10	5.00	ND	99	50-150%	---	---	

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Portland, OR 97232Project: Pickle Factory

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Project Manager: Connor Anderson

Report ID:

A5J1150 - 11 03 25 1310

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 25J0242 - Dry Weight Prep (EPA 8000D)						Soil						
Duplicate (25J0242-DUP1)			Prepared: 10/07/25 11:53 Analyzed: 10/08/25 07:58									CONT
<u>QC Source Sample: Non-SDG (A5J1030-01)</u>												
% Solids	95.7	---	1.00	%	1	---	94.4	---	---	1	10%	
Duplicate (25J0242-DUP2)			Prepared: 10/07/25 11:53 Analyzed: 10/08/25 07:58									
<u>QC Source Sample: Non-SDG (A5J1118-01)</u>												
% Solids	90.1	---	1.00	%	1	---	88.7	---	---	2	10%	
Duplicate (25J0242-DUP3)			Prepared: 10/07/25 11:53 Analyzed: 10/08/25 07:58									CONT
<u>QC Source Sample: Non-SDG (A5J1135-01)</u>												
% Solids	90.5	---	1.00	%	1	---	93.4	---	---	3	10%	
Duplicate (25J0242-DUP4)			Prepared: 10/07/25 11:53 Analyzed: 10/08/25 07:58									
<u>QC Source Sample: Non-SDG (A5J1146-16)</u>												
% Solids	88.2	---	1.00	%	1	---	88.3	---	---	0.1	10%	
Duplicate (25J0242-DUP5)			Prepared: 10/07/25 19:11 Analyzed: 10/08/25 07:58									
<u>QC Source Sample: Non-SDG (A5J1223-01)</u>												
% Solids	97.4	---	1.00	%	1	---	97.7	---	---	0.3	10%	

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

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SAMPLE PREPARATION INFORMATION

Polychlorinated Biphenyls by EPA 8082A

Prep: EPA 3546

Lab Number	Matrix	Method	Sampled	Prepared	Sample Initial/Final	Default Initial/Final	RL Prep Factor
<u>Batch: 25J0533</u>							
A5J1150-01RE2	Soil	EPA 8082A	10/03/25 09:45	10/15/25 09:12	11.59g/5mL	10g/5mL	0.86
A5J1150-02RE2	Soil	EPA 8082A	10/03/25 09:55	10/15/25 09:12	11.05g/5mL	10g/5mL	0.91
A5J1150-03RE2	Soil	EPA 8082A	10/03/25 10:05	10/15/25 09:12	11.71g/5mL	10g/5mL	0.85
A5J1150-04RE1	Soil	EPA 8082A	10/03/25 10:15	10/15/25 09:12	11.26g/5mL	10g/5mL	0.89
A5J1150-05RE1	Soil	EPA 8082A	10/03/25 10:25	10/15/25 09:12	11.89g/5mL	10g/5mL	0.84
A5J1150-06RE1	Soil	EPA 8082A	10/03/25 10:35	10/15/25 09:12	11.71g/5mL	10g/5mL	0.85

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
<u>Batch: 25J1018</u>							
A5J1150-07	Solid	1311/6020B	10/03/25 11:00	10/29/25 10:18	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
<u>Batch: 25J0242</u>							
A5J1150-01	Soil	EPA 8000D	10/03/25 09:45	10/07/25 11:53	1g	1g	1.00
A5J1150-02	Soil	EPA 8000D	10/03/25 09:55	10/07/25 11:53	1g	1g	1.00
A5J1150-03	Soil	EPA 8000D	10/03/25 10:05	10/07/25 11:53	1g	1g	1.00
A5J1150-04	Soil	EPA 8000D	10/03/25 10:15	10/07/25 11:53	1g	1g	1.00
A5J1150-05	Soil	EPA 8000D	10/03/25 10:25	10/07/25 11:53	1g	1g	1.00
A5J1150-06	Soil	EPA 8000D	10/03/25 10:35	10/07/25 11:53	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
<u>Batch: 25J0922</u>							
A5J1150-07	Solid	EPA 1311	10/03/25 11:00	10/27/25 15:49	99.9g/1998g	100g/2000g	NA

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Portland, OR 97232

Project: **Pickle Factory**

Project Number: **1448.01.01**

Project Manager: **Connor Anderson**

Report ID:

A5J1150 - 11 03 25 1310

QUALIFIER DEFINITIONS

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

Apex Laboratories

- C-07** Extract has undergone Sulfuric Acid Cleanup by EPA 3665A, Sulfur Cleanup by EPA 3660B, and Florisil Cleanup by EPA 3620B in order to minimize matrix interference.
- CONT** The Sample Container provided for this analysis was not provided by Apex Laboratories, and has not been verified as part of the Apex Quality System.
- P-12** Result estimated due to the presence of multiple PCB Aroclors and/or PCB congeners not defined as Aroclors.
- TCLP** This batch QC sample was prepared with TCLP or SPLP fluid from preparation batch 25J0922.

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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).

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.

Philip Nerenberg, Lab Director



ANALYTICAL REPORT

Apex Laboratories, LLC

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

Maul Foster & Alongi, INC.

3140 NE Broadway Street
Portland, OR 97232

Project: **Pickle Factory**

Project Number: **1448.01.01**

Project Manager: **Connor Anderson**

Report ID:

A5J1150 - 11 03 25 1310

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 $\frac{1}{2}$ 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.

Apex Laboratories

Philip Nerenberg, Lab Director

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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 correction 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.

Apex Laboratories

Philip Nerenberg, Lab Director

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3140 NE Broadway Street
Portland, OR 97232

Project: **Pickle Factory**

Project Number: **1448.01.01**

Project Manager: **Connor Anderson**

Report ID:

A5J1150 - 11 03 25 1310

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
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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 provided by the client or sampler, and fall outside of Apex Laboratories' Scope of Accreditation.

Apex Laboratories

Philip Nerenberg, Lab Director

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ANALYTICAL REPORT

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ORELAP ID: OR100062

Maul Foster & Alongi, INC.

3140 NE Broadway Street

Portland, OR 97232

Project: Pickle FactoryProject Number: 1448.01.01Project Manager: Connor Anderson

Report ID:

A5J1150 - 11 03 25 1310

APEX LABS COOLER RECEIPT FORM

Client: Maul Foster & Alongi Element WO#: A5J1150Project/Project #: Pickle Factory / M1448.01.001Delivery Info:Date/time received: 10/3/25 @ 14:12 By: RAMDelivered by: Apex ☒ Client ☒ ESS ☐ FedEx ☐ UPS ☐ Radio ☐ Morgan ☐ SDS ☐ Evergreen ☐ Other ☐From USDA Regulated Origin? Yes ☐ No ☒Cooler Inspection Date/time inspected: 10/3/25 @ 14:15 By: RAMChain 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)	<u>1.6</u>						
Custody seals? (Y/N)	<u>N</u>						
Received on ice? (Y/N)	<u>Y</u>						
Temp. blanks? (Y/N)	<u>Y</u>						
Ice type: (Gel/Real/Other)	<u>Real</u>						
Condition (In/Out):	<u>IN</u>						

Cooler out of temp? (Y/N) Possible reason why: (N)Green dots applied to out of temperature samples? Yes ☒ No ☐Out of temperature samples form initiated? Yes ☒ No ☐Sample Inspection: Date/time inspected: 10/3/25 @ 16:41 By: RAMAll 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: Labeled by: RAMWitness: KNCooler Inspected by: RAM

Form Y-003 R-02

Apex Laboratories

Philip Nerenberg

Philip Nerenberg, Lab Director

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October 22, 2025

Service Request No:K2510107

Philip Nerenberg
Apex Laboratories
6700 SW Sandburg St.
Tigard, OR 97223

Laboratory Results for: A5J1150

Dear Philip,

Enclosed are the results of the sample(s) submitted to our laboratory October 10, 2025
For your reference, these analyses have been assigned our service request number **K2510107**.

Analyses were performed according to our laboratory's NELAP-approved quality assurance program. The test results meet requirements of the current NELAP standards, where applicable, and except as noted in the laboratory case narrative provided. For a specific list of NELAP-accredited analytes, refer to the certifications section at www.alsglobal.com. All results are intended to be considered in their entirety, and ALS Group USA Corp. dba ALS Environmental (ALS) is not responsible for use of less than the complete report. Results apply only to the items submitted to the laboratory for analysis and individual items (samples) analyzed, as listed in the report.

Please contact me if you have any questions. My extension is 3261. You may also contact me via email at Hayleigh.Smith@alsglobal.com.

Respectfully submitted,

ALS Group USA, Corp. dba ALS Environmental

Hayleigh Smith
Project Manager

ADDRESS 1317 S. 13th Avenue, Kelso, WA 98626
PHONE +1 360 577 7222 | FAX +1 360 636 1068
ALS Group USA, Corp.
dba ALS Environmental



Narrative Documents

ALS Environmental—Kelso Laboratory
1317 South 13th Avenue, Kelso, WA 98626
Phone (360) 577-7222 Fax (360) 425-9096
www.alsglobal.com

Client: Apex Laboratories
Project: A5J1150
Sample Matrix: Soil

Service Request: K2510107
Date Received: 10/10/2025

CASE NARRATIVE

All analyses were performed consistent with the quality assurance program of ALS Environmental. This report contains analytical results for samples for the Tier II level requested by the client.

Sample Receipt:

One soil sample was received for analysis at ALS Environmental on 10/10/2025. Any discrepancies upon initial sample inspection are annotated on the sample receipt and preservation form included within this report. The samples were stored at minimum in accordance with the analytical method requirements.

Semivolatile GC:

Method NWTPH-Dx, 10/16/2025: The lower control criterion was exceeded for o-Terphenyl and n-Triacontane in sample QT-SLAG due to matrix interference. The presence of non-target background components prevented adequate resolution of the surrogate. Accurate quantitation was not possible. No further corrective action was appropriate.

Metals:

No significant anomalies were noted with this analysis.



Approved by _____

Date 10/22/2025

SAMPLE DETECTION SUMMARY

This form includes only detections above the reporting levels. For a full listing of sample results, continue to the Sample Results section of this Report.

CLIENT ID: QT-SLAG			Lab ID: K2510107-001			
Analyte	Results	Flag	MDL	MRL	Units	Method
Antimony	0.57		0.04	0.17	mg/Kg	6020B
Arsenic	3.83		0.05	0.44	mg/Kg	6020B
Beryllium	0.008	J	0.006	0.035	mg/Kg	6020B
Cadmium	0.085		0.006	0.035	mg/Kg	6020B
Chromium	215		0.06	0.70	mg/Kg	6020B
Copper	457		0.11	0.70	mg/Kg	6020B
Lead	45.7		0.01	0.17	mg/Kg	6020B
Nickel	2770		0.7	3.5	mg/Kg	6020B
Residual Range Organics (C25 - C36 RRO)	11	J	3.9	100	mg/Kg	NWTPH-Dx
Selenium	0.11	J	0.10	0.87	mg/Kg	6020B
Silver	0.071		0.006	0.070	mg/Kg	6020B
Solids, Total	99.9				Percent	160.3 Modified
Zinc	136		0.2	1.7	mg/Kg	6020B



Sample Receipt Information

ALS Environmental—Kelso Laboratory
1317 South 13th Avenue, Kelso, WA 98626
Phone (360) 577-7222 Fax (360) 425-9096
www.alsglobal.com

Client: Apex Laboratories
Project: A5J1150

Service Request:K2510107

SAMPLE CROSS-REFERENCE

<u>SAMPLE #</u>	<u>CLIENT SAMPLE ID</u>	<u>DATE</u>	<u>TIME</u>
K2510107-001	QT-SLAG	10/3/2025	1100

SUBCONTRACT ORDER

Apex Laboratories

A5J1150

102510107

SENDING LABORATORY:

Apex Laboratories
6700 S.W. Sandburg Street
Tigard, OR 97223
Phone: (503) 718-2323
Fax: (503) 336-0745
Project Manager: Philip Nerenberg

RECEIVING LABORATORY:

ALS Group USA - Kelso
1317 S 13th Avenue
Kelso, WA 98626
Phone : (360) 577-7222
Fax: (360) 636-1068

Sample Name: QT-SLAG

Sampled: 10/03/25 11:00

(A5J1150-07)

Analysis	Due	Expires	Comments
Hold Sample	10/10/25 17:00	06/28/28 11:00	
Containers Supplied: (B)2 oz Glass Jar			

Standard TAT

Released By	Date	Received By	Date
<i>[Signature]</i>	10/12 10/10/25	<i>Diane Price</i>	10/10/25 1012
Released By	Date	Received By	Date
<i>Diane Price</i>	10/10/25 1210	<i>Vivian Mikel</i>	10/10/25 1210

SUBCONTRACT ORDER

Apex Laboratories

A5J1150

K25 10107

SENDING LABORATORY:

Apex Laboratories
6700 S.W. Sandburg Street
Tigard, OR 97223
Phone: (503) 718-2323
Fax: (503) 336-0745
Project Manager: Philip Nerenberg

RECEIVING LABORATORY:

ALS Group USA - Kelso
1317 S 13th Avenue
Kelso, WA 98626
Phone : (360) 577-7222
Fax: (360) 636-1068

Sample Name: QT-SLAG

Sampled: 10/03/25 11:00

(A5J1150-07)

Analysis	Due	Expires	Comments
Ag (Silver) - 6020B - Total	10/24/25 17:00	04/01/26 11:00	6010 or 6020
As (Arsenic) - 6020B - Total	10/24/25 17:00	04/01/26 11:00	6010 or 6020
Be (Beryllium) - 6020B - Total	10/24/25 17:00	04/01/26 11:00	6010 or 6020
Cd (Cadmium) - 6020B - Total	10/24/25 17:00	04/01/26 11:00	6010 or 6020
Cr (Chromium) - 6020B - Total	10/24/25 17:00	04/01/26 11:00	6010 or 6020
Cu (Copper) - 6020B - Total	10/24/25 17:00	04/01/26 11:00	6010 or 6020
Dry Weight	10/24/25 17:00	10/17/25 11:00	
Hg (Mercury) - 6020B - Total	10/24/25 17:00	10/31/25 11:00	7471
Ni (Nickel) - 6020B - Total	10/24/25 17:00	04/01/26 11:00	6010 or 6020
NWTPH-Dx (Diesel/Oil)	10/24/25 17:00	10/17/25 11:00	
Pb (Lead) - 6020B - Total	10/24/25 17:00	04/01/26 11:00	6010 or 6020
Sb (Antimony) - 6020B - Total	10/24/25 17:00	04/01/26 11:00	6010 or 6020
Se (Selenium) - 6020B - Total	10/24/25 17:00	04/01/26 11:00	6010 or 6020
Tl (Thallium) - 6020B - Total	10/24/25 17:00	04/01/26 11:00	6010 or 6020
Zn (Zinc) - 6020B - Total	10/24/25 17:00	04/01/26 11:00	6010 or 6020
Containers Supplied:			
(B)2 oz Glass Jar			

Released By	Date	Received By	Date
		m. mulder	10/10/25 12:10
Released By	Date	Received By	Date

Cooler Receipt and Preservation Form

PM HS

Client: Adx Service Request K25 10/10/25
 Received: 10/10/25 Opened: 10/10/25 By: NM Unloaded: 10/10/25 By: NM

1. Samples were received via? USPS Fed Ex UPS DHL PDX Courier Hand Delivered
 2. Samples were received in: (circle) Cooler Box Envelope Other NA
 3. Were custody seals on coolers? NA Y N If yes, how many and where? _____
 If present, were custody seals intact? Y N If present, were they signed and dated? Y N

Temp Blank	Sample Temp	IR Gun	Cooler #/COC ID / NA	Out of temp indicate with "X"	PM Notified If out of temp	Tracking Number NA	Filed
<u>✓</u>	<u>2.8</u>	<u>1002</u>					
	<u>4.0</u>	<u>↓</u>					

4. Was a Temperature Blank present in cooler? NA Y N If yes, note the temperature in the appropriate column below:

If no, take the temperature of a representative sample bottle contained within the cooler; note in the column "Sample Temp": NA Y N

5. Were samples received within the method specified temperature ranges? NA Y N

If no, were they received on ice and same day as collected? If not, note the cooler # below and notify the PM. NA Y N

If applicable, tissue samples were received: Frozen Partially Thawed Thawed

6. Packing material: Inserts Baggies Bubble Wrap Gel Packs Wet Ice Dry Ice Sleeves BOX
 7. Were custody papers properly filled out (ink, signed, etc.)? NA Y N
 8. Were samples received in good condition (unbroken) NA Y N
 9. Were all sample labels complete (ie, analysis, preservation, etc.)? NA Y N
 10. Did all sample labels and tags agree with custody papers? NA Y N
 11. Were appropriate bottles/containers and volumes received for the tests indicated? NA Y N
 12. Were the pH-preserved bottles (see SMO GEN SOP) received at the appropriate pH? Indicate in the table below NA Y N
 13. Were VOA vials received without headspace? Indicate in the table below. NA Y N
 14. Was C12/Res negative? NA Y N
 15. Were samples received within method specified time limit? If not, note the error below and notify the PM. NA Y N
 16. Were 100mL sterile microbiology bottles filled exactly to the 100mL mark? NA Y N Underfilled Overfilled

Sample ID on Bottle	Sample ID on COC	Identified by:

Sample ID	Bottle Count Bottle Type	Head- space	Broke	pH	Reagent	Volume added	Reagent Lot Number	Initials	Time

Notes, Discrepancies, Resolutions: _____



Miscellaneous Forms

ALS Environmental—Kelso Laboratory
1317 South 13th Avenue, Kelso, WA 98626
Phone (360) 577-7222 Fax (360) 425-9096
www.alsglobal.com

Inorganic Data Qualifiers

- * The result is an outlier. See case narrative.
- # The control limit criteria is not applicable.
- B The analyte was found in the associated method blank at a level that is significant relative to the sample result as defined by the DOD or NELAC standards.
- E The result is an estimate amount because the value exceeded the instrument calibration range.
- J The result is an estimated value.
- U The analyte was analyzed for, but was not detected ("Non-detect") at or above the MRL/MDL.
DOD-QSM 4.2 definition : Analyte was not detected and is reported as less than the LOD or as defined by the project. The detection limit is adjusted for dilution.
- i The MRL/MDL or LOQ/LOD is elevated due to a matrix interference.
- X See case narrative.
- Q See case narrative. One or more quality control criteria was outside the limits.
- H The holding time for this test is immediately following sample collection. The samples were analyzed as soon as possible after receipt by the laboratory.

Metals Data Qualifiers

- # The control limit criteria is not applicable.
- J The result is an estimated value.
- E The percent difference for the serial dilution was greater than 10%, indicating a possible matrix interference in the sample.
- M The duplicate injection precision was not met.
- N The Matrix Spike sample recovery is not within control limits. See case narrative.
- S The reported value was determined by the Method of Standard Additions (MSA).
- U The analyte was analyzed for, but was not detected ("Non-detect") at or above the MRL/MDL.
DOD-QSM 4.2 definition : Analyte was not detected and is reported as less than the LOD or as defined by the project. The detection limit is adjusted for dilution.
- W The post-digestion spike for furnace AA analysis is out of control limits, while sample absorbance is less than 50% of spike absorbance.
- i The MRL/MDL or LOQ/LOD is elevated due to a matrix interference.
- X See case narrative.
- + The correlation coefficient for the MSA is less than 0.995.
- Q See case narrative. One or more quality control criteria was outside the limits.

Organic Data Qualifiers

- * The result is an outlier. See case narrative.
- # The control limit criteria is not applicable. See case narrative.
- A A tentatively identified compound, a suspected aldol-condensation product.
- B The analyte was found in the associated method blank at a level that is significant relative to the sample result as defined by the DOD or NELAC standards.
- C The analyte was qualitatively confirmed using GC/MS techniques, pattern recognition, or by comparing to historical data.
- D The reported result is from a dilution.
- E The result is an estimated value over the calibration range.
- J The result is an estimated value between the MDL and the MRL.
- N The result is presumptive. The analyte was tentatively identified, but a confirmation analysis was not performed.
- P The GC or HPLC confirmation criteria was exceeded. The relative percent difference is greater than 40% between the two analytical results.
- U The analyte was analyzed for, but was not detected ("Non-detect") at or above the MRL/MDL.
DOD-QSM 4.2 definition : Analyte was not detected and is reported as less than the LOD or as defined by the project. The detection limit is adjusted for dilution.
- i The MRL/MDL or LOQ/LOD is elevated due to a chromatographic interference.
- X See case narrative.
- Q See case narrative. One or more quality control criteria was outside the limits.

Additional Petroleum Hydrocarbon Specific Qualifiers

- F The chromatographic fingerprint of the sample matches the elution pattern of the calibration standard.
- L The chromatographic fingerprint of the sample resembles a petroleum product, but the elution pattern indicates the presence of a greater amount of lighter molecular weight constituents than the calibration standard.
- H The chromatographic fingerprint of the sample resembles a petroleum product, but the elution pattern indicates the presence of a greater amount of heavier molecular weight constituents than the calibration standard.
- O The chromatographic fingerprint of the sample resembles an oil, but does not match the calibration standard.
- Y The chromatographic fingerprint of the sample resembles a petroleum product eluting in approximately the correct carbon range, but the elution pattern does not match the calibration standard.
- Z The chromatographic fingerprint does not resemble a petroleum product.

ALS Group USA Corp. dba ALS Environmental (ALS) - Kelso
State Certifications, Accreditations, and Licenses

Agency	Web Site	Number
Alaska DEH	http://dec.alaska.gov/eh/lab/cs/csapproval.htm	UST-040
Arizona DHS	http://www.azdhs.gov/lab/license/env.htm	AZ0339
Arkansas - DEQ	http://www.adeq.state.ar.us/techsvs/labcert.htm	88-0637
California DHS (ELAP)	http://www.cdph.ca.gov/certlic/labs/Pages/ELAP.aspx	2795
DOD ELAP	http://www.denix.osd.mil/edqw/Accreditation/AccreditedLabs.cfm	L16-58-R4
Florida DOH	http://www.doh.state.fl.us/lab/EnvLabCert/WaterCert.htm	E87412
Hawaii DOH	http://health.hawaii.gov/	-
ISO 17025	http://www.pjllabs.com/	L16-57
Louisiana DEQ	http://www.deq.louisiana.gov/page/la-lab-accreditation	03016
Maine DHS	http://www.maine.gov/dhhs/	WA01276
Minnesota DOH	http://www.health.state.mn.us/accreditation	053-999-457
Nevada DEP	http://ndep.nv.gov/bsdwlabservice.htm	WA01276
New Jersey DEP	http://www.nj.gov/dep/enforcement/oqa.html	WA005
New York - DOH	https://www.wadsworth.org/regulatory/elap	12060
North Carolina DEQ	https://deq.nc.gov/about/divisions/water-resources/water-resources-data/water-sciences-home-page/laboratory-certification-branch/non-field-lab-certification	605
Oklahoma DEQ	http://www.deq.state.ok.us/CSDnew/labcert.htm	9801
Oregon – DEQ (NELAP)	http://public.health.oregon.gov/LaboratoryServices/EnvironmentalLaboratoryAccreditation/Pages/index.aspx	WA100010
South Carolina DHEC	http://www.scdhec.gov/environment/EnvironmentalLabCertification/	61002
Texas CEQ	http://www.tceq.texas.gov/field/qa/env_lab_accreditation.html	T104704427
Washington DOE	http://www.ecy.wa.gov/programs/eap/labs/lab-accreditation.html	C544
Wyoming (EPA Region 8)	https://www.epa.gov/region8-waterops/epa-region-8-certified-drinking-water	-
Kelso Laboratory Website	www.alsglobal.com	NA

Analyses were performed according to our laboratory's NELAP-approved quality assurance program. A complete listing of specific NELAP-certified analytes, can be found in the certification section at www.ALSGlobal.com or at the accreditation bodies web site.

Please refer to the certification and/or accreditation body's web site if samples are submitted for compliance purposes. The states highlighted above, require the analysis be listed on the state certification if used for compliance purposes and if the method/analyte is offered by that state.

Acronyms

ASTM	American Society for Testing and Materials
A2LA	American Association for Laboratory Accreditation
CARB	California Air Resources Board
CAS Number	Chemical Abstract Service registry Number
CFC	Chlorofluorocarbon
CFU	Colony-Forming Unit
DEC	Department of Environmental Conservation
DEQ	Department of Environmental Quality
DHS	Department of Health Services
DOE	Department of Ecology
DOH	Department of Health
EPA	U. S. Environmental Protection Agency
ELAP	Environmental Laboratory Accreditation Program
GC	Gas Chromatography
GC/MS	Gas Chromatography/Mass Spectrometry
LOD	Limit of Detection
LOQ	Limit of Quantitation
LUFT	Leaking Underground Fuel Tank
M	Modified
MCL	Maximum Contaminant Level is the highest permissible concentration of a substance allowed in drinking water as established by the USEPA.
MDL	Method Detection Limit
MPN	Most Probable Number
MRL	Method Reporting Limit
NA	Not Applicable
NC	Not Calculated
NCASI	National Council of the Paper Industry for Air and Stream Improvement
ND	Not Detected
NIOSH	National Institute for Occupational Safety and Health
PQL	Practical Quantitation Limit
RCRA	Resource Conservation and Recovery Act
SIM	Selected Ion Monitoring
TPH	Total Petroleum Hydrocarbons
tr	Trace level is the concentration of an analyte that is less than the PQL but greater than or equal to the MDL.

ALS Group USA, Corp.
dba ALS Environmental

Analyst Summary report

Client: Apex Laboratories
Project: A5J1150/

Service Request: K2510107

Sample Name: QT-SLAG
Lab Code: K2510107-001
Sample Matrix: Soil

Date Collected: 10/3/25
Date Received: 10/10/25

Analysis Method

160.3 Modified
6020B
7471B
NWTTPH-Dx

Extracted/Digested By

APENNING
KLINN
LSWATOSH

Analyzed By

TRICKMAN
JCHAN
KLINN
JDEMERS

Sample Name: QT-SLAG
Lab Code: K2510107-001.R01
Sample Matrix: Soil

Date Collected: 10/3/25
Date Received: 10/10/25

Analysis Method

6020B

Extracted/Digested By

APENNING

Analyzed By

JCHAN



Sample Results

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Semivolatile Organic Compounds by GC

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ALS Group USA, Corp.
dba ALS Environmental

Analytical Report

Client: Apex Laboratories
Project: A5J1150
Sample Matrix: Soil

Service Request: K2510107
Date Collected: 10/03/25 11:00
Date Received: 10/10/25 12:10

Sample Name: QT-SLAG
Lab Code: K2510107-001

Units: mg/Kg
Basis: Dry

Semi-Volatile Petroleum Products by GC/FID

Analysis Method: NWTPH-Dx
Prep Method: EPA 3550B

Analyte Name	Result	MRL	MDL	Dil.	Date Analyzed	Date Extracted	Q
Diesel Range Organics (C12 - C25 DRO)	ND U	25	1.8	1	10/16/25 19:18	10/13/25	
Residual Range Organics (C25 - C36 RRO)	11 J	100	3.9	1	10/16/25 19:18	10/13/25	

Surrogate Name	% Rec	Control Limits	Date Analyzed	Q
o-Terphenyl	36	50 - 150	10/16/25 19:18	*
n-Triacontane	37	50 - 150	10/16/25 19:18	*



Metals

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ALS Group USA, Corp.
dba ALS Environmental

Analytical Report

Client: Apex Laboratories
Project: A5J1150
Sample Matrix: Soil

Sample Name: QT-SLAG
Lab Code: K2510107-001

Service Request: K2510107
Date Collected: 10/03/25 11:00
Date Received: 10/10/25 12:10

Basis: Dry

Total Metals

Analyte Name	Analysis Method	Result	Units	MRL	MDL	Dil.	Date Analyzed	Date Extracted	Q
Antimony	6020B	0.57	mg/Kg	0.17	0.04	10	10/17/25 11:08	10/14/25	
Arsenic	6020B	3.83	mg/Kg	0.44	0.05	10	10/17/25 11:08	10/14/25	
Beryllium	6020B	0.008 J	mg/Kg	0.035	0.006	10	10/17/25 11:08	10/14/25	
Cadmium	6020B	0.085	mg/Kg	0.035	0.006	10	10/17/25 11:08	10/14/25	
Chromium	6020B	215	mg/Kg	0.70	0.06	10	10/17/25 11:08	10/14/25	
Copper	6020B	457	mg/Kg	0.70	0.11	10	10/17/25 11:08	10/14/25	
Lead	6020B	45.7	mg/Kg	0.17	0.01	10	10/17/25 11:08	10/14/25	
Mercury	7471B	ND U	mg/Kg	0.018	0.002	1	10/22/25 10:19	10/21/25	
Nickel	6020B	2770	mg/Kg	3.5	0.7	100	10/20/25 12:36	10/14/25	
Selenium	6020B	0.11 J	mg/Kg	0.87	0.10	10	10/17/25 11:08	10/14/25	
Silver	6020B	0.071	mg/Kg	0.070	0.006	10	10/17/25 11:08	10/14/25	
Thallium	6020B	ND U	mg/Kg	0.035	0.011	10	10/17/25 11:08	10/14/25	
Zinc	6020B	136	mg/Kg	1.7	0.2	10	10/17/25 11:08	10/14/25	



General Chemistry

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Analytical Report

Client: Apex Laboratories
Project: A5J1150
Sample Matrix: Soil

Sample Name: QT-SLAG
Lab Code: K2510107-001

Service Request: K2510107
Date Collected: 10/03/25 11:00
Date Received: 10/10/25 12:10

Basis: As Received

Inorganic Parameters

Analyte Name	Analysis Method	Result	Units	MRL	MDL	Dil.	Date Analyzed	Q
Solids, Total	160.3 Modified	99.9	Percent	-	-	1	10/13/25 08:21	



QC Summary Forms

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Semivolatile Organic Compounds by GC

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ALS Group USA, Corp.
dba ALS Environmental

QA/QC Report

Client: Apex Laboratories
Project: A5J1150
Sample Matrix: Soil

Service Request: K2510107

SURROGATE RECOVERY SUMMARY
Semi-Volatile Petroleum Products by GC/FID

Analysis Method: NWTPH-Dx
Extraction Method: EPA 3550B

Sample Name	Lab Code	n-Triacontane	o-Terphenyl
		50 - 150	50 - 150
QT-SLAG	K2510107-001	37 *	36 *
QT-SLAG DUP	KQ2518056-01	22 *	22 *
Method Blank	KQ2518056-02	79	78
Lab Control Sample	KQ2518056-03	96	99

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QA/QC Report

Client: Apex Laboratories
Project A5J1150
Sample Matrix: Soil

Service Request: K2510107
Date Collected: 10/03/25
Date Received: 10/10/25
Date Analyzed: 10/16/25

Replicate Sample Summary
Semi-Volatile Petroleum Products by GC/FID

Sample Name: QT-SLAG
Lab Code: K2510107-001

Units: mg/Kg
Basis: Dry

Analyte Name	Analysis Method	MRL	MDL	Sample Result	Duplicate Sample KQ2518056-01 Result	Average	RPD	RPD Limit
Diesel Range Organics (C12 - C25 DRO)	NWTPH-Dx	25	1.8	ND U	ND U	NC	NC	40
Residual Range Organics (C25 - C36 RRO)	NWTPH-Dx	100	3.9	11 J	7.5 J	9.03	34	40

Results flagged with an asterisk (*) indicate values outside control criteria.

Results flagged with a pound (#) indicate the control criteria is not applicable.

Percent recoveries and relative percent differences (RPD) are determined by the software using values in the calculation which have not been rounded.

ALS Group USA, Corp.
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Analytical Report

Client: Apex Laboratories
Project: A5J1150
Sample Matrix: Soil

Service Request: K2510107
Date Collected: NA
Date Received: NA

Sample Name: Method Blank
Lab Code: KQ2518056-02

Units: mg/Kg
Basis: Dry

Semi-Volatile Petroleum Products by GC/FID

Analysis Method: NWTPH-Dx
Prep Method: EPA 3550B

Analyte Name	Result	MRL	MDL	Dil.	Date Analyzed	Date Extracted	Q
Diesel Range Organics (C12 - C25 DRO)	1.8 J	25	1.8	1	10/16/25 18:34	10/13/25	
Residual Range Organics (C25 - C36 RRO)	13 J	100	3.9	1	10/16/25 18:34	10/13/25	

Surrogate Name	% Rec	Control Limits	Date Analyzed	Q
o-Terphenyl	78	50 - 150	10/16/25 18:34	
n-Triacontane	79	50 - 150	10/16/25 18:34	

ALS Group USA, Corp.
dba ALS Environmental

QA/QC Report

Client: Apex Laboratories
Project: A5J1150
Sample Matrix: Soil

Service Request: K2510107
Date Analyzed: 10/16/25
Date Extracted: 10/13/25

Lab Control Sample Summary
Semi-Volatile Petroleum Products by GC/FID

Analysis Method: NWTPH-Dx
Prep Method: EPA 3550B

Units: mg/Kg
Basis: Dry
Analysis Lot: 897318

Lab Control Sample
KQ2518056-03

Analyte Name	Result	Spike Amount	% Rec	% Rec Limits
Diesel Range Organics (C12 - C25 DRO)	288	267	108	42-134
Residual Range Organics (C25 - C36 RRO)	126	133	94	48-141



Metals

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Analytical Report

Client: Apex Laboratories
Project: A5J1150
Sample Matrix: Soil

Sample Name: Method Blank
Lab Code: KQ2518048-03

Service Request: K2510107
Date Collected: NA
Date Received: NA

Basis: Dry

Total Metals

Analyte Name	Analysis Method	Result	Units	MRL	MDL	Dil.	Date Analyzed	Date Extracted	Q
Antimony	6020B	ND U	mg/Kg	0.20	0.05	10	10/17/25 09:59	10/14/25	
Arsenic	6020B	ND U	mg/Kg	0.50	0.05	10	10/17/25 09:59	10/14/25	
Beryllium	6020B	ND U	mg/Kg	0.040	0.007	10	10/17/25 09:59	10/14/25	
Cadmium	6020B	ND U	mg/Kg	0.040	0.007	10	10/17/25 09:59	10/14/25	
Chromium	6020B	0.08 J	mg/Kg	0.80	0.07	10	10/17/25 09:59	10/14/25	
Copper	6020B	ND U	mg/Kg	0.80	0.13	10	10/17/25 09:59	10/14/25	
Lead	6020B	ND U	mg/Kg	0.20	0.02	10	10/17/25 09:59	10/14/25	
Nickel	6020B	ND U	mg/Kg	0.40	0.08	10	10/20/25 12:06	10/14/25	
Selenium	6020B	ND U	mg/Kg	1.0	0.1	10	10/17/25 09:59	10/14/25	
Silver	6020B	ND U	mg/Kg	0.080	0.007	10	10/17/25 09:59	10/14/25	
Thallium	6020B	ND U	mg/Kg	0.040	0.013	10	10/17/25 09:59	10/14/25	
Zinc	6020B	ND U	mg/Kg	2.0	0.2	10	10/17/25 09:59	10/14/25	

ALS Group USA, Corp.
dba ALS Environmental

Analytical Report

Client: Apex Laboratories
Project: A5J1150
Sample Matrix: Soil

Sample Name: Method Blank
Lab Code: KQ2518454-01

Service Request: K2510107
Date Collected: NA
Date Received: NA

Basis: Dry

Total Metals

Analyte Name	Analysis Method	Result	Units	MRL	MDL	Dil.	Date Analyzed	Date Extracted	Q
Mercury	7471B	ND U	mg/Kg	0.02	0.002	1	10/22/25 10:05	10/21/25	

ALS Group USA, Corp.
dba ALS Environmental

QA/QC Report

Client: Apex Laboratories
Project: A5J1150
Sample Matrix: Soil

Service Request: K2510107
Date Analyzed: 10/17/25 - 10/20/25

Lab Control Sample Summary
Total Metals

Units:mg/Kg
Basis:Dry

Lab Control Sample
KQ2518048-04

Analyte Name	Analytical Method	Result	Spike Amount	% Rec	% Rec Limits
Antimony	6020B	87.8	100	88	80-120
Arsenic	6020B	91.7	100	92	80-120
Beryllium	6020B	9.08	10.0	91	80-120
Cadmium	6020B	9.08	10.0	91	80-120
Chromium	6020B	37.1	40.0	93	80-120
Copper	6020B	46.3	50.0	93	80-120
Lead	6020B	88.8	100	89	80-120
Nickel	6020B	102	100	102	80-120
Selenium	6020B	95.0	100	95	80-120
Silver	6020B	9.01	10.0	90	80-120
Thallium	6020B	17.4	20.0	87	80-120
Zinc	6020B	90.0	100	90	80-120

Client: Apex Laboratories
Project: A5J1150
Sample Matrix: Soil

Service Request: K2510107
Date Analyzed: 10/22/25

Lab Control Sample Summary
Total Metals

Units:mg/Kg
Basis:Dry

Lab Control Sample
KQ2518454-02

Analyte Name	Analytical Method	Result	Spike Amount	% Rec	% Rec Limits
Mercury	7471B	0.497	0.500	99	80-120

Attachment D

Data Validation Memorandum



MAUL
FOSTER
ALONGI

Data Validation Memorandum

Project No. M1448.01.001 | November 4, 2025 | The Pickle Factory, LLC

Maul Foster & Alongi, Inc. (MFA), conducted an independent Stage 2A review of the quality of analytical results for soil and solid slag samples collected on October 3, 2025, at the Pickle Factory Site located at 866 North Columbia Boulevard in Portland, Oregon.

Apex Laboratories, LLC (Apex) and ALS Group USA, Corp. dba ALS Environmental located in Kelso, Washington (ALS-K), performed the analyses. MFA reviewed Apex report number A5J1150. All analyses for sample QT-SLAG except toxicity characteristic leaching procedure chromium were subcontracted by Apex to ALS-K and the ALS-K report is attached to the Apex report. The analyses performed and the samples analyzed are listed in the following tables. Not all analyses were performed on all samples.

Analysis	Reference
Diesel- and residual-range hydrocarbons	NWTPH-Dx
Percent dry weight/percent solids	EPA 8000D, EPA 160.3
Polychlorinated biphenyls as Aroclors	EPA 8082A
TCLP chromium	EPA 1311/6020B
Total metals (except mercury)	EPA 6020B
Total mercury	EPA 7471B

Notes

EPA = U.S. Environmental Protection Agency.

NWTPH = Northwest Total Petroleum Hydrocarbons.

TCLP = toxicity characteristic leaching procedure.

Samples Analyzed
Report A5J1150
FTSA-SS-COMP
FTSA-01
FTSA-02
FTSA-03
FTSA-04
FTSA-05
QT-SLAG

Data Validation Procedures

Analytical results were evaluated according to applicable sections of U.S. Environmental Protection Agency (EPA) guidelines for data review (EPA 2020a, 2020b) and appropriate laboratory- and method-specific guidelines (ALS-K 2024, Apex 2025, EPA 1986).

Data validation procedures were modified, as appropriate, to accommodate quality control requirements for methods that EPA data review guidelines do not specifically address (e.g., Northwest Total Petroleum Hydrocarbons [NWTPH]-Dx).

EPA Methods 8000D and 160.3 percent dry-weight/solids results reported by the laboratory for dry-weight correction were reviewed for completeness but were not included in Stage 2A data validation.

Based on the data quality assurance/quality control review described herein, the data, with the appropriate final data qualifiers assigned, are considered acceptable for their intended use. Final data qualifiers represent qualifiers originating from the laboratory and accepted by the reviewer, and data qualifiers assigned by the reviewer during validation.

Final data qualifiers:

- J = result is estimated.
- U = result is non-detect at the method detection limit (MDL) or method reporting limit (MRL).
- UJ = result is non-detect with an estimated MDL.

General Qualifications

Apex noted that, to minimize matrix interference, EPA Method 8082A samples and associated batch quality control samples were processed with sulfuric acid cleanup by EPA Method 3665A, sulfur cleanup by EPA Method 3660B, and Florisil cleanup by EPA Method 3620B. No qualification by the reviewer was required.

In report A5J1150, Apex flagged several EPA Method 8082A results as estimated due to the presence of multiple polychlorinated biphenyl (PCB) Aroclors and/or PCB congeners not defined as Aroclors. The reviewer confirmed with the laboratory that the Aroclors were quantitated based on the closest matching Aroclor; the Aroclor chromatograms may be impacted by weathering in the samples and/or interference from other PCB Aroclors or congeners. The reviewer qualified the associated sample results with J, as shown in the following table.

Report	Sample	Analyte	Original Result (ug/kg)	Qualified Result (ug/kg)
A5J1150	FTSA-SS-COMP	Aroclor 1254	10.6	10.6 J
	FTSA-01	Aroclor 1254	14.9	14.9 J
		Aroclor 1260	12.7	12.7 J
	FTSA-02	Aroclor 1254	12.0	12.0 J
		Aroclor 1260	10.6	10.6 J
	FTSA-03	Aroclor 1254	11.8	11.8 J
	FTSA-05	Aroclor 1254	16.9	16.9 J

Notes

J = result is estimated.

ug/kg = micrograms per kilogram.

Sample Conditions

Sample Custody

Sample custody was appropriately documented on the chain-of-custody forms accompanying the reports.

Holding Times

Extractions and analyses were performed within the recommended holding times.

Preservation and Sample Storage

The samples were preserved and stored appropriately.

Reporting Limits

Apex evaluated results to MRLs and ALS-K evaluated results to MDLs. Samples that required dilutions because of high analyte concentrations, matrix interferences, and/or dilutions necessary for preparation and/or analysis were reported with raised MDLs and MRLs.

ALS-K qualified results between the MDL and the MRL with J, as estimated.

Blank Results

Method Blanks

Laboratory method blanks are used to evaluate whether laboratory contamination was introduced during sample preparation and analysis. Laboratory method blank analyses were performed at the required frequencies, in accordance with laboratory- and method-specific requirements.

According to report A5J1150, the NWTPH-Dx laboratory method blank had diesel- and residual-range hydrocarbons detections between the MDL and the MRL, at concentrations of 1.8 milligrams per kilogram (mg/kg) and 13 mg/kg, respectively. The associated sample residual-range hydrocarbons result was less than the concentration detected in the blank; the reviewer raised the sample detection limit to the MRL and qualified with U, as not detected at the MRL. The associated diesel-range hydrocarbons result was non-detect and did not require qualification.

Report	Sample	Analyte	Method Blank Result (mg/kg)	Original Result (mg/kg)	Qualified Result (mg/kg)
A5J1150	QT-SLAG	Residual-range hydrocarbons	13 J	11 J	100 U

Notes

J = result is estimated.

mg/kg = milligrams per kilogram.

U = result is non-detect at method reporting limit.

According to report A5J1150, the EPA Method 6020B laboratory method blank had a chromium detection between the MDL and the MRL, at a concentration of 0.08 mg/kg. The associated sample result was above the MRL and greater than ten times the laboratory method blank concentration did not require qualification.

All remaining laboratory method blank results were non-detect to MDLs or MRLs.

Equipment Rinsate Blanks

Equipment rinsate blanks are used to evaluate the adequacy of the field equipment decontamination process when decontaminated sampling equipment is used to collect samples.

These blanks were not required for this sampling event, as all samples were collected using dedicated or single-use equipment.

Laboratory Control Sample and Laboratory Control Sample Duplicate Results

Laboratory control sample (LCS) and laboratory control sample duplicate (LCSD) results are used to evaluate laboratory precision and accuracy. LCSD were not reported; all LCS were prepared and analyzed at the required frequency, in accordance with laboratory- and method-specific requirements.

All LCS results were within acceptance limits for percent recovery.

Laboratory Duplicate Results

Laboratory duplicate results are used to evaluate laboratory precision and sample homogeneity. All laboratory duplicate samples were prepared and analyzed at the required frequency, in accordance with laboratory- and method-specific requirements.

Laboratory duplicate results greater than five times the MRL were evaluated using laboratory relative percent difference (RPD) control limits. A secondary criterion was used when laboratory duplicate results were non-detect or less than five times the MRL. Results meet the secondary criterion if the absolute difference of the laboratory duplicate sample result and the parent sample result, or the MRL for non-detects, is equal to or less than the MRL value of the parent sample.

All laboratory duplicate results met the acceptance criteria.

Matrix Spike and Matrix Spike Duplicate Results

Matrix spike (MS) and matrix spike duplicate (MSD) results are used to evaluate laboratory precision, accuracy, and the effect of the sample matrix on sample preparation and target analyte recovery. ALS-K did not report MS or MSD for EPA Method 6020B or 7471B and batch accuracy was evaluated based on the LCS results. All MS and MSD samples were prepared and analyzed at the required frequency, in accordance with laboratory- and method-specific requirements.

All MS and MSD results were within acceptance limits for percent recovery and RPD.

Surrogate Results

Surrogate results are used to evaluate laboratory performance of target organic compounds for individual samples.

According to report A5J1150, the NWTPH-Dx o-terphenyl and n-triacontane surrogate results for sample QT-SLAG were below the lower percent recovery acceptance limit of 50 percent, at 36 percent and 37 percent, respectively. In the case narrative, ALS-K noted that the surrogate exceedances were due to matrix interference and that accurate quantitation was not possible due to the presence of non-target background analytes. The reviewer qualified the associated diesel-range hydrocarbons result, as shown in the following table. The residual-range hydrocarbons sample result was qualified in the Method Blanks section above which takes precedence over surrogate exceedances.

Report	Sample	Analyte	Original Result (mg/kg)	Qualified Result (mg/kg)
A5J1150	QT-SLAG	Diesel-range hydrocarbons	1.8 U	1.8 UJ

Notes

mg/kg = milligrams per kilogram.

U = result is non-detect at the method detection limit.

UJ = result is non-detect with an estimated method detection limit.

All remaining surrogate results were within percent recovery acceptance limits.

Field Duplicate Results

Field duplicate results are used to evaluate field precision and sample homogeneity. No field duplicate samples were submitted for analysis.

Data Package

The data package was reviewed for transcription errors, omissions, and anomalies. None were found.

References

- ALS-K. 2024. *Quality Assurance Manual*. Rev. 31.0. ALS Group USA, Corp. dba ALS Environmental: Kelso, WA. August 2.
- Apex. 2025. *Quality Systems Manual*. Rev. 12. Apex Laboratories, LLC: Tigard, OR. June 20.
- EPA. 1986. *Test Methods for Evaluating Solid Waste, Physical/Chemical Methods*. EPA publication SW-846. 3rd ed. U.S. Environmental Protection Agency. Final updates I (1993), II (1995), IIA (1994), IIB (1995), III (1997), IIIA (1999), IIIB (2005), IV (2008), V (2015), VI phase I (2017), VI phase II (2018), VI phase III (2019), VII phase I (2019), and VII phase II (2020).
- EPA. 2020a. *National Functional Guidelines for Inorganic Superfund Methods Data Review*. EPA 542-R-20-006. U.S. Environmental Protection Agency, Office of Superfund Remediation and Technology Innovation: Washington, DC. November.
- EPA. 2020b. *National Functional Guidelines for Organic Superfund Methods Data Review*. EPA 540-R-20-005. U.S. Environmental Protection Agency, Office of Superfund Remediation and Technology Innovation: Washington, DC. November.