YAKUTAT TLINGIT TRIBE TRIBAL RESPONSE PROGRAM 2009

ANKAU SALTCHUCKS SITE INVESTIGATION REPORT

Prepared for the Yakutat Tlingit Tribe

Prepared by RIDOLFI Inc.

Tribal Response Program ANKAU SALTCHUCKS SITE INVESTIGATION REPORT

Prepared for the Yakutat Tlingit Tribe

Prepared by RIDOLFI Inc.

December 2010



EXECUTIVE SUMMARY

This site investigation focused on dioxin contamination in tissue and soil associated with the Ocean Cape Radio Relay Station (OCRRS) located on the Ankau Saltchucks (Figure 1). Dioxins were detected in soil and shellfish tissues samples collected near the YTT Culture Camp and adjacent to the Ankau Bridge. The Culture Camp is a youth summer camp used by the YTT to teach cultural heritage. The camp is located on a former military site adjacent to the Ankau Saltchucks. In 2000, the Tribe stopped using the camp because of concerns about possible exposure of camp participants to this contamination, which the Tribe believes is associated with former military activities at the site (Sensmeier, 2006).

During June 2010, 10 shellfish tissue samples were collected from eight locations within the Ankau Saltchucks. These samples were then analyzed for dioxins and furans. One composite soil sample was collected from within the Culture Camp area adjacent to the Ankau Salthchucks and was analyzed for dioxins and furans and herbicides.

All 17 of the dioxin and furan congeners with toxicity equivalence factors (TEFs) were detected in the soil sample. No herbicides were detected in the sample, and method detection limits were adequately low to determine if any of the herbicides included in the analysis were present above risk-based-concentration (RBC) values for residential soils.

The total dioxin TEQ concentration of 62.6 ng/kg is more than 14 times higher than the RBC value for residential soils. The results of the soil dioxin sampling confirmed previous sample results that indicated elevated dioxin concentrations are present in the vicinity of the Culture Camp.

A dioxin "congener profile" was developed for the soil sample by calculating the relative percentage of each congener contained in the sample. The profile developed for the soil sample was visually compared to a number of dioxin source profiles compiled by the USEPA.

Based on a visual comparison, the soil sample profile most resembled the source profile for pentachlorophenol. The next closest visual match for the soil profile was the source profile for diesel exhaust.

Analysis of the composite soil sample from the Culture Camp area confirmed the results of previous sampling that had identified elevated concentrations of dioxins and furans in site soils. However, it is difficult to draw defensible conclusions based on a single sample; therefore, more extensive soil sampling should be conducted to define the extent of dioxin contamination in and around the Culture Camp.

While a congener profile was developed based on the distribution of dioxin and furan congeners detected in the soil sample, it is unclear how well a single sample may represent a pattern that



can be tied to a specific source. More extensive soil sampling for dioxins and furans would provide a more robust basis for developing a representative dioxin profile. In addition to more extensive soil sampling, further investigation to identify potential dioxin sources should be conducted.

Dioxin and furan congeners were detected in 8 of the 10 shellfish tissue samples. In all tissue samples, most dioxin and furan congeners were either not detected, or were detected just above the analytical detection limits.

Dioxin concentrations in shellfish tissue were calculated using two different methods; first by calculating a toxicity equivalence (TEQ) concentration for each sample assuming a concentration equal to one half the method detection limit for any non-detected congeners, and second by calculating a TEQ assuming a concentration of zero for non-detected congeners.

When total dioxin TEQ concentrations were calculated assuming a concentration equal to one half the method detection limit for non-detected congeners:

- All ten samples exceeded the risk-based concentration (RBC) established by the USEPA.
- All concentrations were similar, with the maximum concentration about twice as high as the minimum concentration.
- There were no obvious correlations between dioxin concentrations and sample location or shellfish species.

When total dioxin TEQ concentrations were calculated, assuming a concentration of zero for non-detected congeners:

- Two samples exceeded the RBC established by USEPA.
- Four samples exceeded a more protective RBC that is more reflective of a subsistence consumption rate.
- Samples in the north and west of the study area typically had higher dioxin concentrations than samples in the south and east.
- The crab sample collected in the northwest portion of the study area had the highest detected dioxin concentration.

The majority of dioxin and furan congeners detected in shellfish tissue samples were present at levels only slightly above current analytical detection limits. To better understand the potential for health risks to shellfish consumers, and to determine if the higher detected concentrations in the northwest portion of the study area may represent dioxin distinct source areas, more extensive shellfish tissue sampling and analysis should be completed.



To help determine whether dioxin concentrations in shellfish in the Ankau Saltchucks represent localized or more regional dioxin sources, areas determined to best represent "natural background" conditions should be selected, and shellfish should be sampled in these unaffected areas.



TABLE OF CONTENTS

| EXE | CUTI | VE SUN | MMARY | i | | | | | |
|-----|-------------------|---|-------------------------------|----|--|--|--|--|--|
| 1.0 | INTRODUCTION | | | | | | | | |
| | 1.1 1.2 | · 1 · · · · · · · · · · · · · · · · · · | | | | | | | |
| 2.0 | STU | DY DES | SCRIPTION AND METHODS | 4 | | | | | |
| | 2.1 2.2 2.3 | Contan | e Locationsninants of Concern | 4 | | | | | |
| | | 2.3.1 2.3.2 | Tissue SamplingSoil Sampling | | | | | | |
| | 2.4 2.5 | AnalysesQuality Assurance / Quality Control (QA/QC) Summary | | | | | | | |
| 3.0 | ANA | LYTICA | AL RESULTS | 8 | | | | | |
| | 3.1 3.2 3.3 | 3.2 Tissue Samples | | | | | | | |
| 4.0 | SUN | MARY | AND RECOMMENDATIONS | 10 | | | | | |
| | 4.1 | Summary and Conclusions of Analytical Results | | | | | | | |
| | | 4.1.1 4.1.2 | Shellfish SamplesSoil Samples | | | | | | |
| | 4.2 | Recom | mendations for Future Work | 12 | | | | | |
| | | 4.2.1 4.2.2 | ShellfishSoils | | | | | | |
| 5.0 | REF | ERENC | CES | 13 | | | | | |



LIST OF FIGURES

Figure 1. Site Location Map

Figure 2. Ankau Saltchucks Sample Results

LIST OF TABLES

Table 1. Sample Identification, Description, Coordinates, and Analyses Performed

Table 2. Tissue and Soil Analytical Results Compared to Screening Levels for Dioxins/Furans

Table 3. Soil Analytical Results Compared to Screening Levels for Herbicides

LIST OF APPENDICES

Appendix A. Completed Field Forms
Appendix B. Data Quality Review Report



ACRONYMS AND ABBREVIATIONS

° C degrees Celsius

ARI Analytical Resources Inc.

AXYS AxYS Analytical Services Ltd.

GPS global positioning system

MDL method detection limit

MRL method reporting limit

ng/kg nanograms per kilogram

OCRRS Ocean Cape Radio Relay Station

PCP pentachlorophenol ppt parts per trillion

QA/QC quality assurance/quality control QAPP Quality Assurance Project Plan

Ridolfi RIDOLFI Inc.

RBC risk-based concentration TEQ Toxicity Equivalence

TEF Toxicity Equivalent Factors
USACE U.S. Army Corps of Engineers

USEPA U.S. Environmental Protection Agency

WHO World Health Organization

YTT Yakutat Tlingit Tribe



1.0 INTRODUCTION

This site investigation report describes the analytical results from the tissue and soil investigation conducted in June 2010 at the Ankau Saltchucks near Yakutat, Alaska (Figure 1). This report has been prepared on behalf of the Yakutat Tlingit Tribe (YTT). All field and analytical methods were conducted in accordance with the YTT Quality Assurance Project Plan (QAPP) (Ridolfi, 2010). The QAPP was submitted to and approved by the United States Environmental Protection Agency (USEPA), a work plan requirement of the Tribal Response Program under YTT's current agreement with USEPA.

1.1 Purpose and Objectives of the Investigation

The site investigation focused on soil and tissue dioxin contamination associated with the Ocean Cape Radio Relay Station (OCRRS) located on the Ankau Saltchucks (Figure 1). Dioxins were detected in soil and shellfish tissues samples collected near the YTT Culture Camp and adjacent to the Ankau Bridge. The Culture Camp is a youth summer camp used by the YTT to teach cultural heritage. The camp is located on a former military site adjacent to the Ankau Saltchucks. In 2000, the Tribe stopped using the camp because of concerns about possible exposure of camp participants to this contamination, which the Tribe believes is associated with former military activities at the site (Sensmeier, 2006). Former military sites were also located upland of the Ankau Bridge. These sites are shown on Figure 2.

At the request of the Yakutat Tlingit Tribe, RIDOLFI Inc. (Ridolfi) compiled and evaluated existing dioxin data collected within the usual and accustomed lands of the Yakutat Tlingit Tribe. The data reviewed for this evaluation were collected for and summarized in reports prepared for the U.S. Army Corps of Engineers (USACE) and the Yakutat Tlingit Tribe related to the former Yakutat Air Force Base and OCRRS facilities.

Information from previous studies demonstrates that dioxin Toxicity Equivalence (TEQ) exceeds recommended screening levels in soils and tissue samples at the OCRRS site. Additionally, the discovery of a drum of Esteron during USACE field activities in 1985 indicates the use of this herbicide for vegetation control at military sites in the past. Use of Esteron is of concern since it is a mixture of 2,4-dichlorophenoxyacetic acid (2,4-D) and 2,4,5-trichlorophenoxyacetic acid (2,4,5-T), the same ingredients contained in the military defoliant Agent Orange. During the manufacturing process, the product became contaminated with the dioxin 2,3,7,8-tetrachlorodibenzo-p-dioxin (2,3,7,8-TCDD). The 2,3,7,8-TCDD congener is the most toxic dioxin congener.

Based on the limited sampling conducted to date, the greatest risk to members of the Yakutat Tlingit Tribe appears to be through the consumption of shellfish, particularly from the area of the Ankau Saltchucks. Shellfish tissue collected from this area ranged from about 10 to more than 100 times higher than human health-based screening levels. In relation to other media



sampled, including soil, sediment, and surface water, the shellfish samples appear to have disproportionately high dioxin concentrations.

As a preliminary method for evaluating the potential for human health risk, sample concentrations were compared to risk-based concentrations (RBCs) developed by the U.S. Environmental Protection Agency. The results of the evaluation are presented in the QAPP (Ridolfi, 2010).

The purpose of this limited investigation is to conduct additional sampling to supplement previous studies. For this reason, we conducted the following sampling activities:

- Soil sampling in the Culture Camp area, with lower analytical detection limits, to determine a source profile for the dioxins and determine if herbicides are also present in the Culture Camp.
- Seafood sampling in other areas within the Ankau Saltchucks, to determine if elevated tissue concentrations are localized or wide-spread.

1.2 Site Description

The city of Yakutat is located on the Gulf of Alaska at the mouth of Monti Bay, approximately 420 miles east-southeast of Anchorage in the northern part of the Alaska Panhandle (Figure 1). The northwest-trending St. Elias Mountains border the Yakutat area to the northeast. The Tongass National Forest, which is under jurisdiction of the U.S. Forest Service, is located to the northeast and east of Yakutat; and the Wrangell-St. Elias National Park, which is under jurisdiction of the National Park Service, is located to the northwest across Yakutat Bay. The city occupies the site of an earlier Eyak and Tlingit permanent village. In the Tlingit language, the name Yakutat (*Yaakwdáat*) means "the place where canoes rest."

The U.S. military has had a presence in the area surrounding the city of Yakutat and on Phipps Peninsula since at least 1929. Army, Navy, and Air Force facilities were constructed during the 20th century. The most important of these facilities are the airfield (also known as the Yakutat Air Force Base or the Yakutat Air Base), the naval facility area, and the Ocean Cape Radio Relay Station (OCRRS) area. Each of these facility areas comprises a number of sites or clusters of sites. In addition, artillery positions and associated control or observation positions were located along the coast of the peninsula. In the course of operating and subsequently closing the facilities, the Army, Navy, and Air Force stored fuels, used and disposed of hazardous materials, and disposed of solid waste, demolished buildings, and other structural debris in open dumps.



The YTT Culture Camp is located approximately 5 miles west of the community of Yakutat on the Phipps Peninsula at the end of Point Carrew Road, along the western edge of the Ankau Saltchucks (Figure 1). Barracks associated with the OCRRS were formerly located at the Culture Camp, but were removed by USACE in as part of the 1984 cleanup of military sites.



2.0 STUDY DESCRIPTION AND METHODS

This section provides a description of the study including sample locations, contaminants of concern, the field methods used, the analyses performed, and the quality of the data. A more detailed description of the study methods can be found in the QAPP prepared by RIDOLFI Inc. (Ridolfi, 2010).

2.1 Sample Locations

Table 1 presents sample identification information and the analyses performed for each sample. Figure 2 shows the areas that were targeted for sample collection. A total of seven (six primary and one field duplicate) composite clam samples were collected. Two composite clam samples were collected in the Culture Camp area, two from clam beds located between the Culture Camp and the Ankau Bridge, and one near the bridge and one at the mouth of the Ankau Saltchucks. Two composites crab samples were also collected from two areas within the Ankau Saltchucks.

In addition to the seafood samples, one soil sample was collected in the Culture Camp area, for dioxin/furan and herbicide analysis.

2.2 Contaminants of Concern

The tissue composite samples were analyzed for dioxins/furans. The soil sample was submitted for dioxin analysis with sufficiently low detection limits to determine a congener profile of the dioxins to assist in identifying the potential source of the dioxin contamination. The soil sample was also submitted for herbicide analysis. All samples were analyzed for the 17 dioxin/furan congeners identified in Table 2 and Table 3. These results were used to calculate the TEQ for each sample.

2.3 Field Methods

This section discusses how the tissue and soil samples were collected and processed.

2.3.1 Tissue Sampling

The shellfish species selected for this study included butter clams and Dungeness crab. The areas sampled were selected in the field by the sampling team. The general locations for sample collection are shown on Figure 2. A global positioning system (GPS) reading was taken and the location served as the center point of the sampling area with a 10-foot radius for collecting butter clams. Samplers wore nitrile gloves and specimens were collected by hand to the extent possible. Samplers minimized the use of metals tools such as rakes and shovels.

After picking or digging, shellfish were rinsed in ambient seawater at the site to remove sand particles and placed in a plastic bag. A sample label was affixed to the bag, and the bag was placed in a cooler with Blue Ice ®, or similar product, until processed. Samplers attempted to



collect specimens of a size typically harvested for subsistence consumption. For each sample, the process of collecting and rinsing was repeated until a minimum of 400 grams (about one pound) was collected. This is equivalent to a 1-quart jar tightly packed or approximately half of a one-gallon resealable plastic bag. A field form for shellfish (Appendix A) was completed for each sample.

Dungeness crabs were collected from two target sample areas within the Ankau Saltchucks. Three individual crabs were collected from each target area, and combined, to represent a single, composite crab sample for that area. A field form for crab (Appendix A) was completed for each sample.

The two composite samples represent a total of six crabs (three crabs per area for two areas). Dungeness crabs were collected using standard commercial crab pots and ancillary gear. The pots were fished from YTT boats. Sample collection equipment was uncontaminated with grease or oil. The pots were baited with fish heads. The bait was placed in small containers inside the trap to disperse the smell of the bait and attract the crabs.

All of the sampled crabs were male with a carapace length greater than 6.25 inches; this is the current legal catch. Individual crabs were photographed, measured, weighed, and examined for any discoloration, abnormalities, or lesions. Only unbroken crabs were retained for analysis. Each crab was killed by a rapid blow to the area on the underside of the carapace below the eyestalks. Each crab was wrapped in decontaminated aluminum foil, bagged in a zip loc bag, labeled, and placed in a cooler with Blue Ice ®, or similar product, until processed.

Clams were shucked and crab muscle was removed in Yakutat, packed in laboratory-supplied jars and sent to the laboratory for homogenization and analysis. Sample processors were nitrile gloves while preparing samples and changed gloves between samples. The area designated for processing was covered with plastic sheeting then aluminum foil. The aluminum foil was replaced between samples. Sample processing implements were decontaminated between each sample and at the end of each day.

Tissues packed in laboratory-supplied 8-oz. glass jars had a minimum of one-half inch head space to allow for expansion if freezing is required. Sample label information on the collection container was transferred to the label on the glass jar. Samples were packed in iced coolers in the field then frozen until the shipment is sent to the laboratory.

2.3.2 Soil Sampling

One soil sample was collected in the Culture Camp area, in an area previously identified as dioxin contaminated.

Within the sample area, a grid was measured and marked. Grid points were marked with temporary survey flags at approximately 1-foot intervals to create a diamond pattern sampling



grid with a total of nine equidistant sub-sampling points. If obstructions (such as trees, roots, stumps, and rocks) were encountered at a particular subsampling point, that subsampling point was relocated from that grid-point to the nearest accessible location.

Each soil sub-sample was collected using a precleaned disposable polypropylene spoon. To collect each sub-sample, the top 1-inch of surface material was scraped to the side. Sample material was then collected from 1 to 3-inches below the new surface.

A portable scale was used to weigh each sub-sample and obtain approximately 120 grams to contribute equal portions to the composite sample. The sub-samples were placed in a disposable Teflon bag where they were homogenized before being transferred to the sample container. Excess sample material was returned to the area where it was collected.

2.4 Analyses

Chemical analysis of tissue and soil samples for dioxins/furans were conducted by AXYS Analytical Services Ltd. (AXYS) in Sydney, British Columbia using EPA Method 1613B. The project reporting limits for dioxin/furan analysis were the laboratory method detection limits (MDL), which are listed for all 17 congeners in Table 2.

Chemical analysis of the soil sample for herbicides was conducted by Analytical Resources Inc. (ARI) of Tukwila, Washington using EPA Method 8151A.

Project screening levels for dioxins in tissue and soil are listed in Table 2 and for herbicides in soil in Table 3.

Once the dioxin data were received from the laboratory and validated (Section 2.5), the Toxicity Equivalence or TEQ was calculated for each sample. Although dioxins and furans are structurally-related, they each have different properties and varying levels of toxicity. In the environment, dioxins are almost always found as mixtures, rather than as single compounds. To determine the toxicity and evaluate the risks of complex mixtures of dioxins and furans, scientists use a shorthand method for comparing the toxicity of different types or mixtures of dioxins to the toxicity of 2,3,7,8- TCDD, the most toxic dioxin compound. This method is called the "Toxicity Equivalence" or TEQ. A total of 17 dioxin and furan compounds have been determined to have similar types of toxic effects, and each of these 17 has been assigned a factor, known as a "Toxicity Equivalence Factor", or TEF, that expresses how toxic it is in comparison to 2,3,7,8-TCDD. For example, a dioxin compound that is only half as toxic as 2,3,7,8- TCDD would have a TEF of 0.5. When dioxin samples are sent to a laboratory for analysis, the concentrations of these 17 dioxins and furans are typically reported.

To calculate a single concentration for a mixture of dioxins and furans, the concentration of each individual compound is multiplied by its TEF to convert the concentration to an equivalent concentration of 2,3,7,8-TCDD. The equivalent concentrations are then summed to represent a



total TEQ concentration for the entire sample. Concentrations of dioxins are typically reported in units of nanograms per kilogram (ng/kg) or as parts per trillion (ppt). The total TEQ values calculated for this project will be calculated using the most recent (2005) TEF values recommended by the World Health Organization (WHO) (Van den Berg et al., 2006).

2.5 Quality Assurance / Quality Control (QA/QC) Summary

The analytical data were reviewed for accuracy, precision, and completeness; and an independent data quality assurance/quality control (QA/QC) review was completed. The data QA/QC report is included as Appendix B. Complete qualified analytical results for this sampling event are presented in Table 2.

All deliverables required by the project are present and data packages are complete. Recommended sample holding times and conditions were met. Method blanks show trace levels of target compounds which resulted in qualification of associated samples. Compound identification and quantitation is acceptable. Raw data show no indications of system anomalies. The laboratory duplicate criteria were met. Overall analytical performance is considered acceptable, and data quality is sufficient for project use.



3.0 ANALYTICAL RESULTS

3.1 Screening Levels and Reporting Limits

For purposes of screening the analytical results, the laboratory data for tissue and soil samples were compared to the risk-based concentrations (RBCs) developed by the U.S. Environmental Protection Agency, Region 3 (USEPA, 2009). The RBC values for fish tissue were developed based on potential risks to a recreational fisher, and therefore may not be adequately protective of subsistence shellfish consumers, who would likely consume more shellfish for a longer period of time. The RBC value is intended to be protective for a person consuming 54 grams of fish and shellfish per day (about seven 8-ounce servings per month) for 30 years. An RBC value based on an average subsistence fisher exposure (assuming one 8-ounce serving per day for an entire lifetime) would be 10 times lower than the USEPA RBC screening value. The RBC value for soils is based on a residential exposure scenario.

Laboratory method reporting limits (MRLs) were targeted to be below these screening levels to the extent possible. Laboratory results indicated as detected are those results that are reported by the laboratory above their MRL, which is the minimum concentration of an analyte that the laboratory can routinely identify and quantify above the method detection limit (MDL). The MDL is statistically derived and represents a "best case" sensitivity. The MDL is lower than the MRL and has inherently higher associated uncertainty. For dioxins/furans that were not detected, one-half the MRL was used as the concentration to compare to screening guidelines.

3.2 Tissue Samples

A total of ten shellfish tissue samples were analyzed for dioxins and furans, including one laboratory duplicate sample and one field duplicate sample. Dioxin TEQ concentrations were calculated in two ways; one by summing the TEQ concentrations only for the detected congeners; and one by summing all the TEQ concentrations, using one half the method detection limit for all non-detected congeners.

For the purpose of evaluating potential human health risks, the USEPA typically recommends using half the detection limit to represent potential exposure concentrations for non-detected chemicals. Dioxin TEQs calculated using this method were compared to the risk-based concentrations (RBCs) for fish tissue developed by USEPA, discussed in above in Section 3.1. The TEQ concentrations for all ten samples exceeded the RBC of 0.021 nanograms per kilogram (ng/kg or "parts per trillion"). Total TEQ concentrations ranged from 0.061 ng/kg to 0.13 ng/kg, with a mean concentration of 0.084 ng/kg, or about four times the RBC value.

It is also useful to evaluate the dioxin TEQs based only on the detected congeners (i.e., assuming that concentrations of non-detected congeners are zero) to determine if there are patterns in the distribution of dioxins in shellfish collected from different areas. Dioxin TEQs



based on only the detected dioxin and furan congeners ranged from zero to 0.078 ng/kg with a mean concentration of 0.012 ng/kg. The highest detected concentrations were found in samples located in the northwest portion of the study area. When the dioxin concentrations were calculated using this approach, two samples exceeded the USEPA RBC value of 0.021 ng/kg, and four samples exceeded a more subsistence-based RBC of 0.0021 ng/kg.

3.3 Soil Samples

One composite soil sample was collected from the Culture Camp area and analyzed for dioxins and furans. All 17 of the dioxin and furan congeners with toxicity equivalence factors were detected in the sample. The total dioxin TEQ concentration calculated for the sample was 62.6 ng/kg or more than 14 times the soil RBC value of 4.3 ng/kg. The soil sample was also analyzed for a variety of herbicides

In an effort to in identify the potential source of dioxins detected at the Culture Camp, a "congener profile" of the soil sample was developed and compared to profiles for common human-caused sources of dioxins compiled by USEPA. Sources of dioxins are broadly classified as combustion and incineration sources or chemical manufacturing and processing sources, and each source typically results in the release of certain mixtures of dioxins and furans. These mixtures can be translated into what are termed 'congener profiles' that represent the distribution of dioxin and furan congeners present in the mixture. A congener profile may serve as a signature of the types of dioxins and furans associated with particular environmental sources of these compounds. Common congener profiles that have been compiled by the USEPA include profiles for municipal, medical, and hazardous waste incineration; cement kilns burning and not burning hazardous waste; industrial oil-fired boilers; industrial coal and wood combustors; unleaded fuel combustion in vehicles; diesel fuel combustion in trucks; secondary aluminum smelters; secondary lead smelters; sewage sludge incineration; bleached chlorine paper pulp; technical pentachlorophenol; and 2,4-D salts and esters (Cleverly et al., 1997).

The congener profile developed for the composite soil sample was compared visually to profiles published by the USEPA.

In addition to dioxins and furans, the soil sample was analyzed for nine herbicides using EPA Method 8151A. No herbicides were detected in the sample, and all method detection limits were well below the USEPA RBC values for residential soils.



4.0 SUMMARY AND RECOMMENDATIONS

4.1 Summary and Conclusions of Analytical Results

During June 2010, 10 shellfish tissue samples collected from eight locations within the Ankau Saltchucks were analyzed for dioxins and furans. One composite soil sample was collected from within the Culture Camp area adjacent to the Ankau Salthchucks, and was analyzed for dioxins and furans and herbicides.

4.1.1 Shellfish Samples

Dioxin and furan congeners were detected in eight of the 10 shellfish tissue samples.

In all tissue samples, most dioxin and furan congeners were either not detected, or were detected just above the analytical detection limits.

Dioxin concentrations in shellfish tissue were calculated using two different methods; first by calculating a toxicity equivalence (TEQ) concentration for each sample assuming a concentration equal to one half the method detection limit for any non-detected congeners, and second by calculating a TEQ assuming a concentration of zero for non-detected congeners.

When total dioxin TEQ concentrations were calculated assuming a concentration equal to one half the method detection limit for non-detected congeners:

- All ten samples exceeded the risk-based concentration (RBC) established by the USEPA.
- All concentrations were similar, with the maximum concentration about twice as high as the minimum concentration.
- There were no obvious correlations between dioxin concentrations and sample location or shellfish species.

When total dioxin TEQ concentrations were calculated, assuming a concentration of zero for non-detected congeners:

Two samples exceeded the RBC established by USEPA.



- Four samples exceeded a more protective RBC, more reflective of a subsistence consumption rate.
- Samples in the north and west of the study area typically had higher dioxin concentrations than samples in the south and east.
- The crab sample collected in the northwest portion of the study area had the highest detected dioxin concentration.

4.1.2 Soil Samples

All 17 of the dioxin and furan congeners with toxicity equivalence factors (TEFs) were present in the soil sample.

No herbicides were detected in the sample, and method detection limits were adequately low to determine if any of the herbicides included in the analysis were present above RBC values for residential soils.

The total dioxin TEQ concentration of 62.6 ng/kg is more than 14 times higher than the RBC value for residential soils.

The results of the soil dioxin sampling confirmed previous sample results that indicated elevated dioxin concentrations are present in the vicinity of the Culture Camp.

A dioxin "congener profile" was developed for the soil sample by calculating the relative percent of each congener contained in the sample.

The profile developed for the soil sample was visually compared to a number of dioxin source profiles compiled by the USEPA.

Based on a visual comparison, the soil sample profile most resembled the source profile for pentachlorophenol. The next closest visual match for the soil profile was the source profile for diesel exhaust.

While the congener profile developed for the soil sample represents the distribution of dioxin and furan congeners detected in soils within an area of the Culture Camp, it is unclear how well a single sample may represent a pattern that can be tied to a specific source. It is possible that the source of dioxins may be pentachlorophenol (PCP), as dioxins are a well-known contaminant of PCP, and PCP has been detected at former military sites surrounding the Ankau



Salthchucks. It is also possible that the source may be related to the combustion of diesel fuel, or from other sources.

4.2 Recommendations for Future Work

Based on the results of the shellfish tissue and soil sampling, the following actions are recommended:

4.2.1 Shellfish

The majority of dioxin and furan congeners detected in shellfish tissue samples were present at levels only slightly above current analytical detection limits. To better understand the potential for health risks to shellfish consumers, and to determine if the higher detected concentrations in the northwest portion of the study area may represent dioxin distinct source areas, more extensive shellfish tissue sampling and analysis should be completed.

To help determine whether dioxin concentrations in shellfish in the Ankau Saltchucks represent localized or more regional dioxin sources, areas determined to best represent "natural background" conditions should be selected, and shellfish samples should be collected in these unaffected areas.

To more accurately assess potential human health risks, actual shellfish harvest and consumption patterns should be evaluated.

4.2.2 Soils

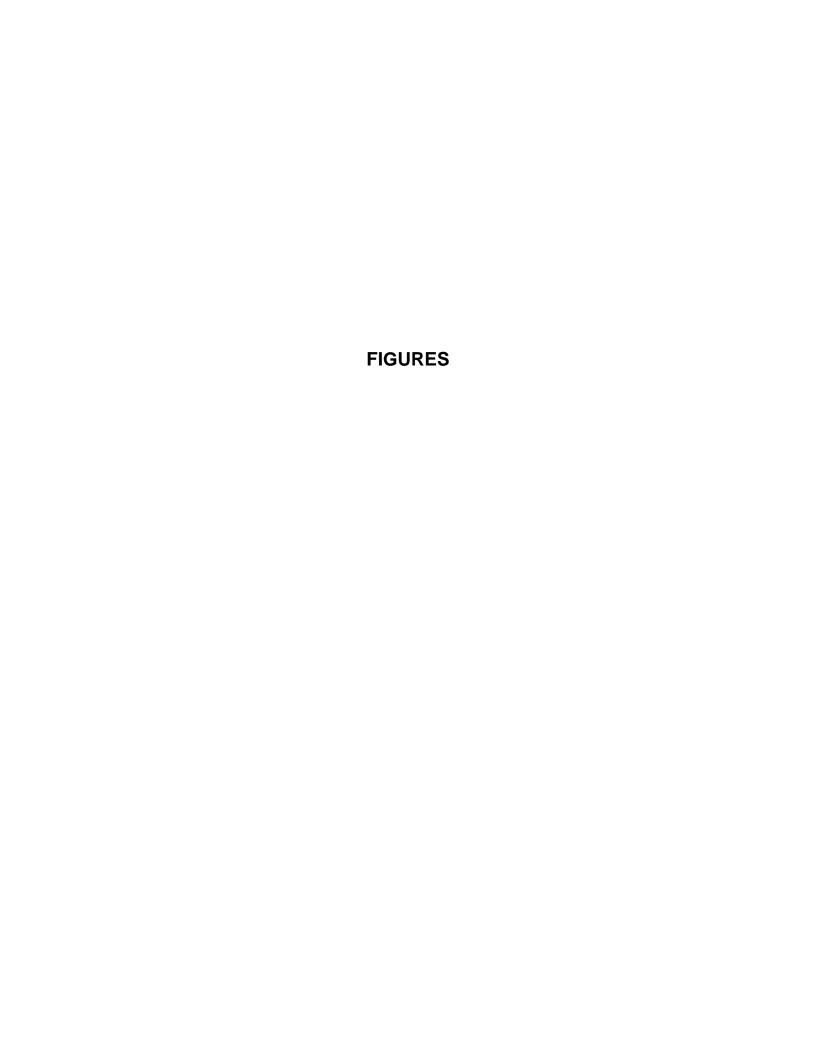
Analysis of the composite soil sample from the Culture Camp area confirmed the results of previous sampling that had identified elevated concentrations of dioxins and furans in site soils. However, it is difficult to draw defensible conclusions based on a single sample. More extensive soil sampling should be conducted to define the extent of dioxin contamination in and around the Culture Camp.

While a congener profile was developed based on the distribution of dioxin and furan congeners detected in the soil sample, it is unclear how well a single sample may represent a pattern that can be tied to a specific source. More extensive soil sampling for dioxins and furans would provide a more robust basis for developing a representative dioxin profile. In addition to more extensive soil sampling, further investigation of potential dioxin sources should be conducted.

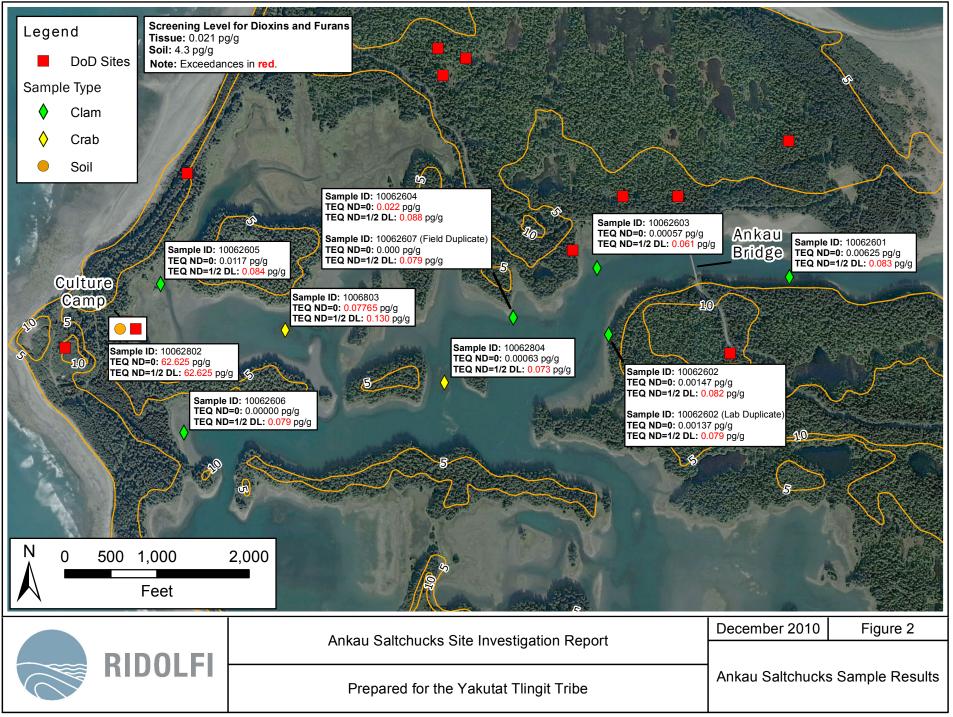


5.0 REFERENCES

- Cleverly, D.; Schaum, J.; Schweer, G.; Becker, J.; Winters, D. 1997. The congener profiles of anthropogenic sources of chlorinated dibenzo-p-dioxins and chlorinated dibenzofurans in the United States. Presentation at Dioxin '97, the 17th International Symposium on Chlorinated Dioxins and Related Compounds, held August 25-29 in Indianapolis, IN, USA. Short paper in, Organohalogen Compounds, Volume 32:430-435.
- RIDOLFI Inc. (Ridolfi). 2010. Yakutat Tlingit Tribe Tribal Response Program 2009 Ankau Site Investigation Quality Assurance Project Plan. March.
- Sensmeier, Violet. 2006. Former Military Sites Questionnaire. Tribal member interviews conducted by V. Sensmeier, Environmental Director, Yakutat Tlingit Tribe.
- U.S. Environmental Protection Agency (USEPA). 2009. Screening Level (RSL) Table for Residential Soil. EPA Region 3. http://www.epa.gov/reg3hwmd/risk/human/rbconcentration_table/Generic_Tables/pdf/ressoil_sl_table_run_APRIL2009.pdf. Accessed June 9, 2009.
- Van den Berg et al. 2006. The 2005 World Health Organization Re-evaluation of Human and Mammalian Toxic Equivalency Factors for Dioxins and Dioxin-like Compounds. Toxicological Sciences 2006 93(2):223-241; doi:10.1093/toxsci/kfl055.







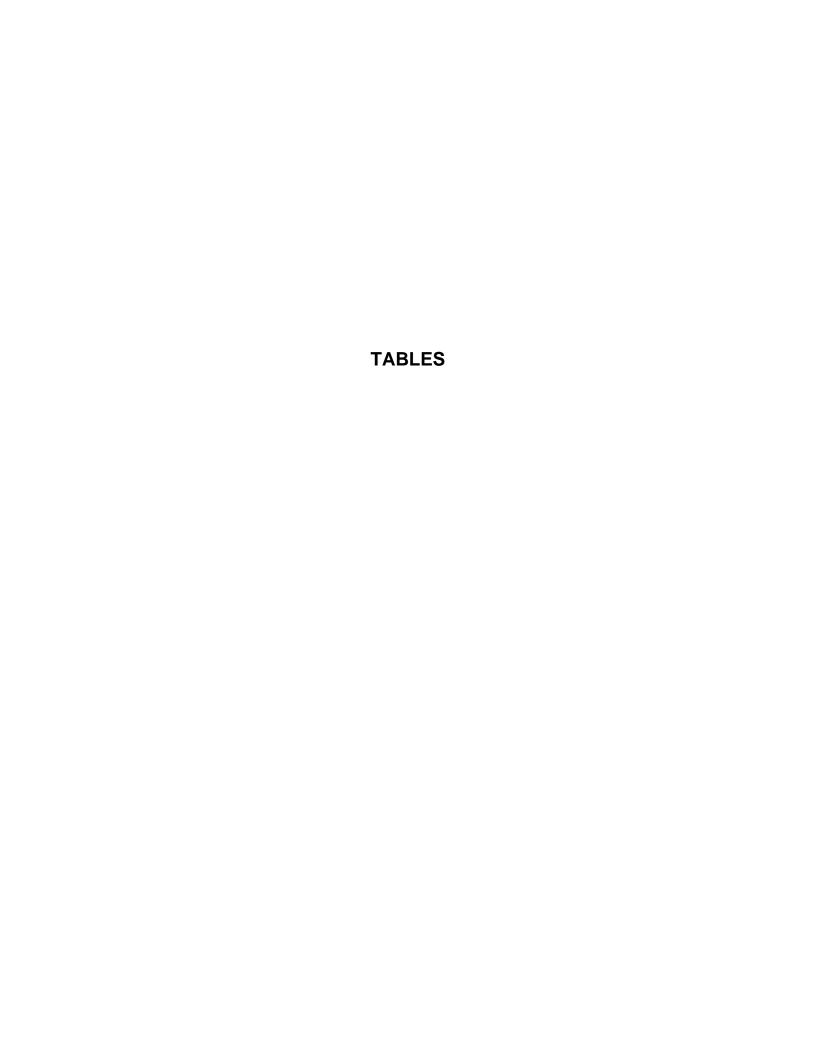




Table 1. Sample Identification, Description, Coordinates, and Analyses Performed

| Sample | | | | | | | | | |
|----------|--------|-----------|-------|----------------|--|--------------|------------|--------|------------|
| Number | Media | Date | Time | Note | Location | Latitude | Longitude | Dioxin | Herbicides |
| 10062601 | tissue | 6/26/2010 | 8:00 | Horse Clam | east of Ankua Bridge | -139.818304° | 59.545496° | Χ | |
| 10062602 | tissue | 6/26/2010 | 8:45 | Butter Clam | southwest of Ankua Bridge, south shore | -139.828518° | 59.543296° | Χ | |
| 10062603 | tissue | 6/26/2010 | 9:15 | Butter Clam | west of Ankua Bridge, northshore | -139.82955° | 59.545248° | Χ | |
| 10062604 | tissue | 6/26/2010 | 9:30 | Butter Clam | southwest of Ankua Bridge, north shore | -139.834167° | 59.543553° | Χ | |
| 10062605 | tissue | 6/26/2010 | 11:00 | Softshell Clam | east of Culture Camp | -139.854866° | 59.543581° | Χ | |
| 10062606 | tissue | 6/26/2010 | 12:00 | Softshell Clam | southeast of Culture Camp | -139.852716° | 59.539245° | Χ | |
| 10062607 | tissue | 6/26/2010 | 9:00 | Butter Clam | field duplicate 10062604 | -139.834167° | 59.543553° | Χ | |
| 10062803 | tissue | 6/28/2010 | 19:30 | Dungeness Crab | Culture Camp | -139.847368° | 59.542548° | Х | |
| 10062804 | tissue | 6/28/2010 | 20:00 | Dungeness Crab | Ankau Bridge | -139.837823° | 59.541437° | Х | |
| 10062802 | soil | 6/28/2010 | 15:00 | Upland soils | Culture Camp | -139.856638° | 59.542276° | Х | Х |



Table 2. Tissue and Soil Analytical Results Compared to Screening Levels for Dioxins and Furans

| Matrix | | ٦ | issue (pg/g) | | | Tis | ssue (pg/g) | | | Ti | ssue (pg/g) | |
|---------------------|-----------------|-----------------|--------------|---------------|---------------|-----|--------------|---------------|---------------|-------|---------------|---------------|
| Screening Level* | | | 0.021 (pg/g) | | | 0. | .021 (pg/g) | | 0.021 (pg/g) | | | |
| | | | | | | | | | | | | |
| Analyte | Sample ID: | | 10062601 | | | • | 10062602 | | 10 | 06260 | 2 (Lab Duplic | ate) |
| | Laboratory ID: | | L14960-1 R | | | L14 | 1960-2 R (A) | | WG3 | 3826- | 103 (DUP L14 | 1960-2) |
| | Date Collected: | | 6/26/2010 | | | (| 6/26/2010 | | | (| 6/26/2010 | |
| | TEF | Concentration | TEQ ND=0 | TEQ ND=1/2 DL | Concentration | | TEQ ND=0 | TEQ ND=1/2 DL | Concentration | | TEQ ND=0 | TEQ ND=1/2 DL |
| 2,3,7,8-TCDD | 1 | 0.0498 u | 0.00000 | 0.025 | 0.0496 | u | 0.00000 | 0.025 | 0.0494 | u | 0.00000 | 0.025 |
| 1,2,3,7,8-PECDD | 1 | 0.0498 u | 0.00000 | 0.025 | 0.0496 | u | 0.00000 | 0.025 | 0.0494 | u | 0.00000 | 0.025 |
| 1,2,3,4,7,8-HXCDD | 0.1 | 0.0498 u | 0.00000 | 0.002 | 0.0496 | u | 0.00000 | 0.002 | 0.0499 | u | 0.00000 | 0.002 |
| 1,2,3,6,7,8-HXCDD | 0.1 | 0.0498 u | 0.00000 | 0.002 | 0.0496 | u | 0.00000 | 0.002 | 0.0499 | u | 0.00000 | 0.002 |
| 1,2,3,7,8,9-HXCDD | 0.1 | 0.054 j | 0.00540 | 0.005 | 0.05 | u | 0.00000 | 0.002 | 0.0499 | u | 0.00000 | 0.002 |
| 1,2,3,4,6,7,8-HPCDD | 0.01 | 0.115 uj | 0.00000 | 0.001 | 0.094 | uj | 0.00000 | 0.000 | 0.127 | j | 0.00127 | 0.001 |
| OCDD | 0.0003 | 0.803 uj | 0.00000 | 0.000 | 0.343 | uj | 0.00000 | 0.000 | 0.23 | j | 0.00007 | 0.000 |
| Furans | | | | | | | | | | | | |
| 2,3,7,8-TCDF | 0.1 | 0.0498 u | 0.00000 | 0.002 | 0.0496 | u | 0.00000 | 0.002 | 0.0494 | u | 0.00000 | 0.002 |
| 1,2,3,7,8-PECDF | 0.03 | 0.0498 u | 0.00000 | 0.001 | 0.0496 | u | 0.00000 | 0.001 | 0.0494 | u | 0.00000 | 0.001 |
| 2,3,4,7,8-PECDF | 0.3 | 0.0498 u | 0.00000 | 0.007 | 0.066 | uj | 0.00000 | 0.010 | 0.0494 | u | 0.00000 | 0.007 |
| 1,2,3,4,7,8-HXCDF | 0.1 | 0.0498 u | 0.00000 | 0.002 | 0.0496 | u | 0.00000 | 0.002 | 0.0494 | u | 0.00000 | 0.002 |
| 1,2,3,6,7,8-HXCDF | 0.1 | 0.0498 u | 0.00000 | 0.002 | 0.0496 | u | 0.00000 | 0.002 | 0.0494 | u | 0.00000 | 0.002 |
| 1,2,3,7,8,9-HXCDF | 0.1 | 0.0498 u | 0.00000 | 0.002 | 0.0496 | u | 0.00000 | 0.002 | 0.0494 | u | 0.00000 | 0.002 |
| 2,3,4,6,7,8-HXCDF | 0.1 | 0.052 uj | 0.00000 | 0.003 | 0.0496 | u | 0.00000 | 0.002 | 0.0494 | u | 0.00000 | 0.002 |
| 1,2,3,4,6,7,8-HPCDF | 0.01 | <i>0.0</i> 85 j | 0.00085 | 0.001 | 0.086 | j | 0.00086 | 0.001 | 0.0494 | u | 0.00000 | 0.000 |
| 1,2,3,4,7,8,9-HPCDF | 0.01 | 0.0719 u | 0.00000 | 0.000 | 0.061 | j | 0.00061 | 0.001 | 0.0494 | u | 0.00000 | 0.000 |
| OCDF | 0.0003 | 0.138 uj | 0.00000 | 0.000 | 0.098 | uj | 0.00000 | 0.000 | 0.088 | j | 0.00003 | 0.000 |
| Total | | | 0.00625 | 0.083 | | | 0.00147 | 0.082 | | | 0.00137 | 0.079 |

*U.S. Environmental Protection Agency, Region 3 (USEPA, 2009)

ID - Identification

pg/g - picogram per gram

TEF - Toxicity Equivalence Factor

TEQ ND=0 - Toxicity Equivalent for non-detects TEF-modified concentration assumed to be a value of zero.

TEQ ND=1/2 DL - Toxicity Equivalent for non-detects TEF-modified concentration assumed to be a value equal to one-half the method detection limit.

Detected concentrations are italicized.

Concentrations appearing in **bold** exceed the screening level.

j = The detected value is an estimated quantity.

u = The compound was not detected above the method reporting limit.

uj = The nondetected value is an estimated quantity.



Table 2. Tissue and Soil Analytical Results

| Matrix | | | - | Tissue (pg/g) | | | Т | issue (pg/g) | | | Ti | ssue (pg/g) | |
|---------------------|-----------------|---------------|----|---------------|---------------|---------------|--------------|--------------|---------------|---------------|-------------|-------------|---------------|
| Screening Level* | | | | 0.021 (pg/g) | | | 0.021 (pg/g) | | | 0 | .021 (pg/g) | | |
| | | | | | | | | | | | | | |
| Analyte | Sample ID: | | | 10062603 | | | | 10062604 | | | | 10062605 | |
| | Laboratory ID: | | | L14960-3 | | | | L14960-4 | | | | L14960-5 | |
| | Date Collected: | | | 6/26/2010 | | | | 6/26/2010 | | | (| 6/26/2010 | |
| | TEF | Concentration | | TEQ ND=0 | TEQ ND=1/2 DL | Concentration | | TEQ ND=0 | TEQ ND=1/2 DL | Concentration | | TEQ ND=0 | TEQ ND=1/2 DL |
| 2,3,7,8-TCDD | 1 | 0.0566 | u | 0.00000 | 0.028 | 0.0457 | u | 0.00000 | 0.023 | 0.0488 | u | 0.00000 | 0.024 |
| 1,2,3,7,8-PECDD | 1 | 0.0337 | u | 0.00000 | 0.017 | 0.0457 | j | 0.00000 | 0.023 | 0.0488 | u | 0.00000 | 0.024 |
| 1,2,3,4,7,8-HXCDD | 0.1 | 0.0424 | u | 0.00000 | 0.002 | 0.093 | j | 0.0093 | 0.009 | 0.0488 | u | 0.00000 | 0.002 |
| 1,2,3,6,7,8-HXCDD | 0.1 | 0.0379 | u | 0.00000 | 0.002 | 0.057 | j | 0.0057 | 0.006 | 0.0488 | u | 0.00000 | 0.002 |
| 1,2,3,7,8,9-HXCDD | 0.1 | 0.0406 | u | 0.00000 | 0.002 | 0.0469 | u | 0.00000 | 0.002 | 0.052 | j | 0.00520 | 0.005 |
| 1,2,3,4,6,7,8-HPCDD | 0.01 | 0.107 | u | 0.00000 | 0.001 | 0.133 | uj | 0.00000 | 0.001 | 0.095 | uj | 0.00000 | 0.000 |
| OCDD | 0.0003 | 0.273 | uj | 0.00000 | 0.000 | 0.361 | uj | 0.00000 | 0.000 | 0.727 | uj | 0.00000 | 0.000 |
| Furans | | | | | | | | | | | | | |
| 2,3,7,8-TCDF | 0.1 | 0.0154 | u | 0.00000 | 0.001 | 0.0457 | u | 0.00000 | 0.002 | 0.0488 | u | 0.00000 | 0.002 |
| 1,2,3,7,8-PECDF | 0.03 | 0.019 | j | 0.00057 | 0.001 | 0.0457 | u | 0.00000 | 0.001 | 0.0488 | u | 0.00000 | 0.001 |
| 2,3,4,7,8-PECDF | 0.3 | 0.0161 | u | 0.00000 | 0.002 | 0.0457 | u | 0.00000 | 0.007 | 0.0488 | u | 0.00000 | 0.007 |
| 1,2,3,4,7,8-HXCDF | 0.1 | 0.0253 | u | 0.00000 | 0.001 | 0.0457 | u | 0.00000 | 0.002 | 0.0488 | u | 0.00000 | 0.002 |
| 1,2,3,6,7,8-HXCDF | 0.1 | 0.0228 | u | 0.00000 | 0.001 | 0.0457 | u | 0.00000 | 0.002 | 0.0488 | u | 0.00000 | 0.002 |
| 1,2,3,7,8,9-HXCDF | 0.1 | 0.0295 | u | 0.00000 | 0.001 | 0.07 | j | 0.007 | 0.007 | 0.0488 | u | 0.00000 | 0.002 |
| 2,3,4,6,7,8-HXCDF | 0.1 | 0.0202 | u | 0.00000 | 0.001 | 0.0457 | u | 0.00000 | 0.002 | 0.065 | j | 0.00650 | 0.007 |
| 1,2,3,4,6,7,8-HPCDF | 0.01 | 0.0466 | u | 0.00000 | 0.000 | 0.0457 | u | 0.00000 | 0.000 | 0.0488 | u | 0.00000 | 0.000 |
| 1,2,3,4,7,8,9-HPCDF | 0.01 | 0.0466 | u | 0.00000 | 0.000 | 0.0457 | u | 0.00000 | 0.000 | 0.0488 | u | 0.00000 | 0.000 |
| OCDF | 0.0003 | 0.0484 | u | 0.00000 | 0.000 | 0.089 | uj | 0.00000 | 0.000 | 0.095 | uj | 0.00000 | 0.000 |
| Total | | | | 0.00057 | 0.061 | | | 0.022 | 0.088 | | | 0.0117 | 0.084 |

*U.S. Environmental Protection Agency, Reg

ID - Identification

pg/g - picogram per gram

TEF - Toxicity Equivalence Factor

TEQ ND=0 - Toxicity Equivalent for non-dete

TEQ ND=1/2 DL - Toxicity Equivalent for nor

Detected concentrations are italicized.

Concentrations appearing in **bold** exceed the

j = The detected value is an estimated quant

u = The compound was not detected above t

uj = The nondetected value is an estimated c



Table 2. Tissue and Soil Analytical Results

| Matrix | | | Tis | ssue (pg/g) | | | Т | issue (pg/g) | | | Tis | sue (pg/g) | |
|---------------------|-----------------|---------------|-----|-------------|---------------|---------------|--------|-----------------|---------------|---------------|-----|------------|---------------|
| Screening Level* | | | 0.0 | 021 (pg/g) | | 0.021 (pg/g) | | | | 0.021 (pg/g) | | | |
| | | | | | | | | | | | | | |
| Analyte | Sample ID: | | 1 | 0062606 | | 1006260 | 7 (Fie | ld Duplicate of | f 10062604) | | 1 | 0062803 | |
| | Laboratory ID: | | L | 14960-6 i | | | | L14960-7 | | | L | 14960-8 | |
| | Date Collected: | | 6 | /26/2010 | | | | 6/26/2010 | | | 6 | /28/2010 | |
| | TEF | Concentration | | TEQ ND=0 | TEQ ND=1/2 DL | Concentration | | TEQ ND=0 | TEQ ND=1/2 DL | Concentration | | TEQ ND=0 | TEQ ND=1/2 DL |
| 2,3,7,8-TCDD | 1 | 0.0497 | u | 0.00000 | 0.025 | 0.0497 | u | 0.00000 | 0.025 | 0.076 | j | 0.076 | 0.076 |
| 1,2,3,7,8-PECDD | 1 | 0.0497 | u | 0.00000 | 0.025 | 0.0497 | u | 0.00000 | 0.025 | 0.0492 | u | 0.00000 | 0.025 |
| 1,2,3,4,7,8-HXCDD | 0.1 | 0.0497 | u | 0.00000 | 0.002 | 0.0497 | u | 0.00000 | 0.002 | 0.0492 | u | 0.00000 | 0.002 |
| 1,2,3,6,7,8-HXCDD | 0.1 | 0.0497 | u | 0.00000 | 0.002 | 0.0497 | u | 0.00000 | 0.002 | 0.0492 | u | 0.00000 | 0.002 |
| 1,2,3,7,8,9-HXCDD | 0.1 | 0.0497 | u | 0.00000 | 0.002 | 0.0497 | u | 0.00000 | 0.002 | 0.0492 | u | 0.00000 | 0.002 |
| 1,2,3,4,6,7,8-HPCDD | 0.01 | 0.098 | uj | 0.00000 | 0.000 | 0.088 | uj | 0.00000 | 0.000 | 0.078 | uj | 0.00000 | 0.000 |
| OCDD | 0.0003 | 0.408 | uj | 0.00000 | 0.000 | 0.507 | uj | 0.00000 | 0.000 | 0.366 | uj | 0.00000 | 0.000 |
| Furans | | | | | | | | | | | | | |
| 2,3,7,8-TCDF | 0.1 | 0.0497 | u | 0.00000 | 0.002 | 0.0497 | u | 0.00000 | 0.002 | 0.0492 | u | 0.00000 | 0.002 |
| 1,2,3,7,8-PECDF | 0.03 | 0.0497 | u | 0.00000 | 0.001 | 0.0497 | u | 0.00000 | 0.001 | 0.055 | j | 0.00165 | 0.002 |
| 2,3,4,7,8-PECDF | 0.3 | 0.0497 | u | 0.00000 | 0.007 | 0.0497 | u | 0.00000 | 0.007 | 0.0492 | u | 0.00000 | 0.007 |
| 1,2,3,4,7,8-HXCDF | 0.1 | 0.0497 | u | 0.00000 | 0.002 | 0.0497 | u | 0.00000 | 0.002 | 0.0492 | u | 0.00000 | 0.002 |
| 1,2,3,6,7,8-HXCDF | 0.1 | 0.0497 | u | 0.00000 | 0.002 | 0.0497 | u | 0.00000 | 0.002 | 0.0492 | u | 0.00000 | 0.002 |
| 1,2,3,7,8,9-HXCDF | 0.1 | 0.0497 | u | 0.00000 | 0.002 | 0.0497 | u | 0.00000 | 0.002 | 0.0492 | u | 0.00000 | 0.002 |
| 2,3,4,6,7,8-HXCDF | 0.1 | 0.0497 | u | 0.00000 | 0.002 | 0.0497 | u | 0.00000 | 0.002 | 0.0492 | u | 0.00000 | 0.002 |
| 1,2,3,4,6,7,8-HPCDF | 0.01 | 0.0497 | u | 0.00000 | 0.000 | 0.0497 | u | 0.00000 | 0.000 | 0.0558 | u | 0.00000 | 0.000 |
| 1,2,3,4,7,8,9-HPCDF | 0.01 | 0.0497 | u | 0.00000 | 0.000 | 0.0497 | u | 0.00000 | 0.000 | 0.0558 | u | 0.00000 | 0.000 |
| OCDF | 0.0003 | 0.0497 | u | 0.00000 | 0.000 | 0.119 | uj | 0.00000 | 0.000 | 0.097 | uj | 0.00000 | 0.000 |
| Total | | | | 0.00000 | 0.079 | | | 0.00000 | 0.079 | | | 0.07765 | 0.130 |

*U.S. Environmental Protection Agency, Reg

ID - Identification

pg/g - picogram per gram

TEF - Toxicity Equivalence Factor

TEQ ND=0 - Toxicity Equivalent for non-dete

TEQ ND=1/2 DL - Toxicity Equivalent for nor

Detected concentrations are italicized.

Concentrations appearing in **bold** exceed the

j = The detected value is an estimated quant

u = The compound was not detected above t

uj = The nondetected value is an estimated c



Table 2. Tissue and Soil Analytical Results

| Matrix | | | Ti | ssue (pg/g) | | | Soil (pg/g) | | | |
|---------------------|-----------------|---------------|----|-------------|---------------|---------------|-------------|---------------|--|--|
| Screening Level* | | | 0 | .021 (pg/g) | | 4.3 | | | | |
| | | | | | | | | | | |
| Analyte | Sample ID: | | | 10062804 | | | 10062802 | | | |
| | Laboratory ID: | | | L14960-9 | | | L14960-10 R | | | |
| | Date Collected: | | (| 6/28/2010 | | | 6/28/2010 | | | |
| | TEF | Concentration | | TEQ ND=0 | TEQ ND=1/2 DL | Concentration | TEQ ND=0 | TEQ ND=1/2 DL | | |
| 2,3,7,8-TCDD | 1 | 0.0462 | u | 0.00000 | 0.023 | 1.01 | 1.01 | 1.01 | | |
| 1,2,3,7,8-PECDD | 1 | 0.0462 | u | 0.00000 | 0.023 | 6.01 | 6.01 | 6.01 | | |
| 1,2,3,4,7,8-HXCDD | 0.1 | 0.0462 | u | 0.00000 | 0.002 | 11.9 | 1.19 | 1.19 | | |
| 1,2,3,6,7,8-HXCDD | 0.1 | 0.0462 | u | 0.00000 | 0.002 | 44.2 | 4.42 | 4.42 | | |
| 1,2,3,7,8,9-HXCDD | 0.1 | 0.0462 | u | 0.00000 | 0.002 | 39.7 | 3.97 | 3.97 | | |
| 1,2,3,4,6,7,8-HPCDD | 0.01 | 0.0462 | u | 0.00000 | 0.000 | 2,970 | 29.7 | 29.7 | | |
| OCDD | 0.0003 | 0.224 | uj | 0.00000 | 0.000 | 33,900 | 10.17 | 10.17 | | |
| Furans | | | | | | | | | | |
| 2,3,7,8-TCDF | 0.1 | 0.0462 | u | 0.00000 | 0.002 | 5.83 | 0.583 | 0.583 | | |
| 1,2,3,7,8-PECDF | 0.03 | 0.0462 | u | 0.00000 | 0.001 | 2.33 | 0.0699 | 0.0699 | | |
| 2,3,4,7,8-PECDF | 0.3 | 0.0462 | u | 0.00000 | 0.007 | 4.03 | 1.209 | 1.209 | | |
| 1,2,3,4,7,8-HXCDF | 0.1 | 0.0462 | u | 0.00000 | 0.002 | 16.7 | 1.67 | 1.67 | | |
| 1,2,3,6,7,8-HXCDF | 0.1 | 0.0462 | u | 0.00000 | 0.002 | 8.15 | 0.815 | 0.815 | | |
| 1,2,3,7,8,9-HXCDF | 0.1 | 0.0462 | u | 0.00000 | 0.002 | 0.404 | j 0.04 | 0.04 | | |
| 2,3,4,6,7,8-HXCDF | 0.1 | 0.0462 | u | 0.00000 | 0.002 | 5.23 | 0.523 | 0.523 | | |
| 1,2,3,4,6,7,8-HPCDF | 0.01 | 0.063 | j | 0.00063 | 0.001 | 106 | 1.06 | 1.06 | | |
| 1,2,3,4,7,8,9-HPCDF | 0.01 | 0.0462 | u | 0.00000 | 0.000 | 10.4 | 0.104 | 0.104 | | |
| OCDF | 0.0003 | 0.0462 | u | 0.00000 | 0.000 | 268 | 0.08 | 0.08 | | |
| Total | | | | 0.00063 | 0.073 | | 62.625 | 62.625 | | |

*U.S. Environmental Protection Agency, Reg

ID - Identification

pg/g - picogram per gram

TEF - Toxicity Equivalence Factor

TEQ ND=0 - Toxicity Equivalent for non-dete

TEQ ND=1/2 DL - Toxicity Equivalent for nor

Detected concentrations are italicized.

Concentrations appearing in **bold** exceed the

j = The detected value is an estimated quant

u = The compound was not detected above t

uj = The nondetected value is an estimated c



Table 3. Soil Analytical Results Compared to Screening Levels for Herbicides

| Sample ID: | | 10062802 | | |
|-----------------|-------------------|-----------|---|-----------|
| Laboratory ID: | | RC99A | | |
| Date Collected: | | 6/28/2010 | | |
| | | | | Screening |
| | | Results | | Levels* |
| Analyte | CAS Number | (µg/kg) | | (mg/kg) |
| Dalapon | 75-99-0 | 38 | u | 1,800 |
| Dicamba | 62610-39-3 | 19 | u | 1,800 |
| MCPA | 94-75-6 | 9,400 | u | - |
| Dichlorprop | 7547-66-2 | 38 | u | - |
| 2,4-D | 94-75-7 | 38 | u | 690 |
| MCPP | 94-65-2 | NA | | - |
| Silvex | 93-72-1 | 9.4 | u | - |
| 2,4,5-T | 93-76-5 | 9.4 | u | 610 |
| 2,4-DB | 94-80-4 | 190 | u | - |
| Dinoseb | 89396-94-1 | 19 | u | 61 |

- * U.S. EPA Regional Screening Levels, December 2009
- not available

NA - not analyzed for

APPENDIX A COMPLETED FIELD FORMS

| Species (Latin or common name): Horse Clam |
|---|
| Sample Number: 10062601 Sampling Date: 6/26/10 |
| Collector Name(s): A James, D. James Start Time: 750 J. Klushkan, K. Foster Stop Time: 800 Am |
| Location/Site: Map Clam 6 Water Body Name: Ankau Saltchuck 1000 east Bridge S, Shore |
| GPS Coordinates: LAT: 59, 32, 730 LONG: 1390 49, 098' |
| Location Marked on Map:(check when completed) |
| Photos: (yes) no) Photo Numbers: 1-3 4(Stanfsh) |
| Count: 7 Collection Method: Shovel to Lossen, Collected with gloved hand, ringed in salt water, 3' dia hole |
| Notes: (unusual odors at collection site, stained soils, discolored animals, abnormalities) |
| |
| Checked by: 1 Joseph Date: 6/29/10 |

| Species (Latin or common name): Butter Clams |
|---|
| Sample Number: 10062602 Sampling Date: 6/26/10 |
| Collector Name(s): AJames, D. James Start Time: 840 J. Klushkan, Ktoster Stop Time: 855 A |
| Location/Site: Man Clam 4 Water Body Name: An Kau Saltchuck 200/5W Bridge, South shore GPS Coordinates: LAT: 59° 32.598′. LONG: 139° 49.711′ |
| Location Marked on Map: (check when completed) |
| Photos: (yes)/no) Photo Numbers: 6-10 (Photo 5 inside pack example) |
| Count: 32 Collection Method: 5 hovel to lossen, Collect w/glovel Navas, Rinsed Saltwater, 2,5 dia hole |
| Notes: (unusual odors at collection site, stained soils, discolored animals, abnormalities) Collected Sufficent number for duplicate Sample Numbered 10082607 |
| Checked by: 4 Jost so Date: 6/28/10 |

| Species (Latin or common name): Butter Clam |
|---|
| Sample Number: 10062603 Sampling Date: 6/26/10 |
| Collector Name(s): A. James Start Time: 9A Stop Time: 915A |
| Location/Site: Map Clam 5 Water Body Name: An Kau Saltchuck 1000 West Bridge, Porthshore GPS Coordinates: LAT: 590 32.715 LONG: 1390 49, 773 |
| Location Marked on Map: (check when completed) |
| Photos: (Fes)/ no) Photo Numbers: //-/2 |
| goved hand, Rinsel saltuater, I dia hole |
| Notes: (unusual odors at collection site, stained soils, discolored animals, abnormalities) |
| |
| Checked by: V Foto Date: 6/28/10 |

| | Species (Latin or common name): Butter Claim |
|----|--|
| | Sample Number: 10062604 Sampling Date: 6/26/10 |
| | Collector Name(s): Prop A James DJames Start Time: 9:0A J Klush Kan, K doster Stop Time: 950A |
| 24 | Location/Site: Map Clam 3 Water Body Name: Ankau Saltchuck |
| 20 | GPS Coordinates: LAT: 590 32.613 GPS location B/x holes LONG: 1390 50.050 GPS location B/x holes |
| | Location Marked on Map:(check when completed) |
| | Photos: (yes) no) Photo Numbers: 13-20 Cincludes panorama of saltchuck |
| | Count: 14 Collection Method: Shovel to lossen, Collected of gloved hand 3 holes - 2 diaeach, 12 circumfo |
| | Notes: (unusual odors at collection site, stained soils, discolored animals, abnormalities) |
| | |
| (| Checked by: A John Date: 6/28/18 |

| Species (Latin or common name): Softshell Clam |
|--|
| Sample Number: 10062605 Sampling Date: 6/26/10 |
| Collector Name(s): A. James D. James Start Time: 1025 JKlushkan, K. Loster Stop Time: 1/A |
| Location/Site: Map Clam 1 Water Body Name: An Kay Saltchuck GOD NE Culture camp GPS Coordinates: LAT: 590 32.6/5 |
| LONG: 139° 5/, 292 Location Marked on Map: (check when completed) |
| Photos: (ves) / no) Photo Numbers: 22-247 (28-28 Clouds) |
| Count: 30 Collection Method: 5 ho vel to loosen, Collectedu/gloves |
| Notes: (unusual odors at collection site, stained soils, discolored animals, abnormalities) |
| |
| Checked by: Late: 6/28/10 |

| Species (Latin or common name): Softshell Clam |
|---|
| Sample Number: 1006260 |
| Collector Name(s): A. James, D. James Start Time: 1/40 A J. Klushkan, K. Foster Stop Time: 1230 |
| Location/Site: Map Clam 2 Water Body Name: Ankau Saltchuck 1300 SE of Culture CAmp GPS Coordinates: LAT: 590 32.355 LONG: 1390 51. 163 |
| Location Marked on Map:(check when completed) |
| Photos (yes) no) Photo Numbers: 24 30 30-3/ |
| Count: 22 Collection Method: Shovel to loosen, Collectedul gloved hands, 10 holes over 25 dia area holes 15-3 |
| Notes: (unusual odors at collection site, stained soils, discolored animals, abnormalities) |
| |
| Checked by: 4 |

Field Record for Crab

| Samp | le Number:_ <u>/</u> | 00628 | 03 | Sampl | ing Date:_ | 6/28/10 |
|---|----------------------|---------------------|-----------------|-------------------------------------|-----------------------|----------------|
| Collec | ctor Name(s):_ | A. Jame D. Jam | | St | tart Time:_top Time:_ | 6 pm 6/26/10 |
| Locatio | on/Site: CU | Huse C | emp | Water Bo | dy Name: | Ankau Saltchuc |
| GPS C | oordinates: | LAT: 59 LONG: 13 | 1°32′ 39° 50 | <i>33.42"W</i> 21 51,43 l |) | * , |
| Location Marked on Map:(check when completed) | | | | | | |
| Photos: | (yes)(no) I | Photo Numbe | rs: gH | e Crobs, | not b | cotesí |
| Collecti | ion Method:_ | Crab | pot | | · a | €/ |
| | 11 | | • | | . 5. | |
| Animal No. | Body Length | Weight | Sex | Damage from Collection? | | Abnormalities |
| 12 | 711 | 216 | M | no | Missin | a I claw |
| 3 | 6" | 1/16 | M | NO | · no | re |
| 4 | 6,5" | 1,51b, | m | MO | Missi | no 1 claw |
| 5 | | | | | | |
| | . 1/ - | 1 0 | | | | |

Field Record for Crab

| Sample | e Number;/ | 00628 | 304 | Samplin | ng Date:_ | 6/24/10 | |
|---|---------------------|-------------------|----------|----------------------------|------------------------|-----------------|-----|
| Collect | or Name(s): | A. Jam. D. Jam | es es | | rt Time:_ p Time:_(| of I CIBI | 2/ |
| Locatio | n/Site: An | Kau Brid | ge | Water Bod | ly Name:_ | Ankau Saltchuck | _ |
| GPS Coordinates: LAT: 59° 32' 28,94"N LONG: 1396 50' 13,40"W | | | | | | | |
| Location Marked on Map:(check when completed) | | | | | | | |
| Photos: (yes)/no) Photo Numbers: | | | | | | | |
| Collection Method: Crab pot | | | | | | | |
| Animal No. | Body Length | Weight | Sex | Damage from Collection? | | Abnormalities | |
| 01 | 6,75 | 1,516. | m | No | missi | no 1 claw | |
| 02 | 6,5" | 1.316 | M | NO | | None | |
| 03 | 6.25" | 1 /b. | M | NO | | vonesmullelan | |
| 04 | YANG OLI WASHINGTON | 10 | | | | | |
| 05 | | | | | | 247 | |
| Checked | l by: | 2 los | | Dat | e:_6 | 120/10 | ea. |

APPENDIX B DATA QUALITY REVIEW REPORT

ANKAU SALTCHUCKS SITE INVESTIGATION DATA VALIDATION QA/QC REVIEW

Polychlorinated dibenzodioxins and dibenzofurans analyses were performed by AXYS Analytical Services, Inc., of Sydney, British Columbia, Canada, and herbicides were performed by Analytical Resources, Inc, Tukwila, Washington, in accordance with Ankau Saltchucks Site Investigation Quality Assurance Project Plan (Ridolfi, 2010).

Nine tissue and one soil sample were analyzed for polychlorinated dibenzodioxins and dibenzofurans, and one soil was also analyzed for herbicides. The laboratories provided U.S. EPA CLP style deliverables for all sample delivery groups.

Samples were analyzed and results reported by the laboratory in batch numbers as summarized below:

RC99:

| Sample | Date Collected | Matrix |
|----------|----------------|--------|
| 10062802 | 6/28/10 | soil |

DPWG34058:

| Sample | Date Collected | Matrix |
|----------|----------------|--------|
| 10062601 | 6/26/10 | tissue |
| 10062602 | 6/26/10 | tissue |
| 10062603 | 6/26/10 | tissue |
| 10062604 | 6/26/10 | tissue |
| 10062605 | 6/26/10 | tissue |
| 10062606 | 6/26/10 | tissue |
| 10062607 | 6/26/10 | tissue |
| 10062802 | 6/28/10 | soil |
| 10062803 | 6/28/10 | tissue |
| 10062804 | 6/28/10 | tissue |

DIOXINS/FURANS - U.S. EPA Method 1613 Revision B.

Sample Holding Times- acceptable

All samples were handled and delivered to the laboratory according to chain-of-custody procedure. Laboratory data deliverables were complete. The cooler temperature upon laboratory receipt was 0 °C and all samples were kept frozen at -20 C until time of extraction. Maximum holding times for extractables were specified as 30 days/1 year (sample/ extract maximum holding times) for both solids and waters, all extraction and

analytical holding times were met since the samples were frozen until being prepared for analysis.

GC Resolution Criteria – acceptable

The separation criteria of \leq 25% valley measurement between compounds 2,3,7,8-TCDF and 2,3,4,7-TCDF was met.

Ongoing Precision and Accuracy – acceptable

Four ongoing precision and accuracy (OPR) samples were analyzed (two tissue and two solid) with the respective matrix batch. Seventeen compounds and sixteen labeled compounds were analyzed and the percent recoveries were within the laboratory established limits.

Blanks – *acceptable*

Four procedural blanks were analyzed for each analytical group. The blanks contained low levels of target compounds, which were compared to the associated laboratory data. The samples were qualified as 'U' for the following compounds for the indicated samples, due to blank contamination:

Sample 10062601 for 1,2,3,4,6,7,8-HPCDD, OCDD, 2,3,4,6,7,8-HXCDF and OCDF.

Sample 10062602 for 1,2,3,4,6,7,8-HPCDD, OCDD, 2,3,4,7,8-PECDF and OCDF.

Sample 10062603 for OCDD and total Hexa-dioxins.

Sample 10062603 L for 1,2,3,4,6,7,8-HPCDD.

Sample 10062604 for 1,2,3,4,6,7,8-HPCDD, OCDD and OCDF.

Sample 10062606 for 1,2,3,4,6,7,8-HPCDD, OCDD and OCDF.

Sample 10062606 i for 1,2,3,4,6,7,8-HPCDD and OCDD.

Sample 10062607 for 1,2,3,4,6,7,8-HPCDD, OCDD and OCDF.

Sample 10062803 for 1,2,3,4,6,7,8-HPCDD, OCDD and OCDF.

Sample 10062804 for OCDD.

Labeled Compound Performance – *acceptable*

Labeled compound performance was reviewed. The labeled compound recoveries and the ion abundance ratios and RRTs were acceptable.

Laboratory Duplicates – *acceptable*

Duplicate analysis was performed on sample 10062602. All compound relative percent differences were less than 35% with the exception of OCDD which was 39.3%. No qualification was made to the data since the matrix was tissue and the concentrations were less than >10x the reporting limit.

Target Compound Identification and Reporting Limits – acceptable

For several samples, a 'K' qualifier was reported by the laboratory which indicates a peak was detected but did not meet the quantification criteria, the result represents the maximum possible concentration. These compounds were additionally qualified as estimated 'J' during data validation to indicate the maximum criteria. Additionally, several compounds were also qualified as 'U' for blank contamination.

HERBICIDES – 8151A

Samples were analyzed for herbicides using EPA method 8151A.

Sample Holding Times- acceptable

The soil extraction was performed within 14 days of collection, and all analyses were performed within 40 days of extraction, per the method.

Blank Contamination – acceptable

Analytical method blanks were analyzed at for each matrix type per SDG. No analyte responses were reported.

Surrogate Recovery- *acceptable*

Surrogate compounds were added to project samples and laboratory quality control samples prior to analysis to assess analytical performance for the samples. All surrogate recoveries are within specification.

Matrix Spike/Matrix Spike Duplicate Recovery – acceptable

A spike pair was not reported with the dataset.

Laboratory Control Sample Recovery – *acceptable*

Laboratory control samples were analyzed per matrix. LCS performance is considered acceptable.

Compound Identification - acceptable

No problems were noted with the result forms.

System Performance: The chromatograms were reviewed for baseline shifts, general instrument response and missed peaks. No anomalies were noted.

Overall Assessment: All deliverables required by the project are present and data packages are complete. Recommended sample holding times and conditions were met. Method blanks show trace levels of target compounds which resulted in qualification of associated samples. Compound identification and quantitation is acceptable. Raw data show no indications of system anomalies. The laboratory duplicate criteria were met. The OPR samples recovered in limits. Overall analytical performance is considered acceptable, and data quality is sufficient for project use.

References:

U.S. Environmental Protection Agency (USEPA). 1996. Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, SW-846.

U.S. Environmental Protection Agency (USEPA). 1999. USEPA Contract Laboratory Program National Functional Guidelines for Organic Data Review. EPA540/R-99/008. October.

U.S. Environmental Protection Agency (USEPA). 2005. USEPA Contract Laboratory Program National Functional Guidelines for Chlorinated Dioxin/Furan Data Review. EPA-540-R-05-001 September