

2012 Final

Former Utica Mine Camp Site

Remedial Investigation

and

Site Cleanup Report

WHPacific

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Anchorage, Alaska 99503

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LIST of ACRONYMS and ABBREVIATIONS

AAC	Alaska Administrative Code
ADEC	Alaska Department of Environmental Conservation
AOC	Area of Concern
bgs	Below Ground Surface
BTEX	benzene, toluene, ethylbenzene, and xylenes
CFR	code of federal regulations
COC	contaminant of concern
COPC	contaminant of potential concern
CY	Cubic Yard
DRO	Diesel Range Organic Compounds
EPA	Environmental Protection Agency
ESA	Environmental Site Assessment
GPS	Global Positioning System
GRO	Gasoline Range Organic Compounds
mg/kg	Milligrams per kilogram
mil	millimeter
MS/MSD	matrix spike and matrix spike duplicate
MTGW	18 AAC 75 Method Two Migration to Groundwater Cleanup Level
NRC	NANA Regional Corporation
PAH	Polycyclic Aromatic Hydrocarbon
PID	Photo Ionization Detector
POL	Petroleum, Oil, and Lubricants
ppm	Parts per million
RRO	Residual Range Organic Compounds
SSHSP	Site-specific health and safety plan
WHPacific	WHPacific, Inc.
TP	Test Pit
TPECI	Travis/Peterson Environmental Consulting, Inc.
USGS	United States Geological Survey
VOC	Volatile organic compounds
XRF	X-ray fluorescence

Introduction

Sivunig, Inc. was tasked by NANA Regional Corporation (NRC) to provide environmental services at the Utica Mine Camp Site, south of Deering, Alaska. Under an existing master services agreement Sivunig based the field investigation and remedial efforts within the legal framework of 18 Alaska Administrative Code (AAC) 70, 75, and 80. Effective October 1, 2012 WHPacific, Inc. announced the consolidation of Sivunig, Inc. into the overall WHPacific operations. The environmental team members on the Utica project have not changed. The team members seamlessly retained their specific certifications such as OSHA Hazwoper and Alaska Department of Environmental Conservation (ADEC) qualified samplers. The purpose of this report is to document the 2012 field efforts and sampling results, particularly in relation to the ADEC approved work plan (Sivunig, 2012) for these activities.

Project Objectives

Objectives of the 2012 field work were to provide a comprehensive characterization of the contamination at the mine camp site and conduct limited removal activities. Tasks to meet these objectives were as follows:

- characterize the extent of contamination in the soils at eight different previously identified areas of concern (AOCs) through field screening and the collection of analytical samples
- characterize possible contamination in the soil and water at a suspected settling pond
- collect samples from undisturbed areas adjacent to the mine site to establish the natural background levels of metals
- construct a land farm on site for the remediation of hydrocarbon contaminated soils
- segregate soils with high metal concentrations into super sacks, regardless of high POL concentrations
- monitor AOCs with Areas of Potential Effect (archaeological) during investigation (AOCs 3, 5, 6, 7, 9, 10)

Information gained from these tasks will assist NRC with determining the remedial actions necessary in order to achieve site closure. Information will provide an environmental baseline and be useful for future land use decisions.

Remedial actions planned included moving metals contaminated soils from stockpiles into supersacks and constructing a landfarm for POL contaminated soils. Remedial efforts were limited due to mobilization constraints; efforts focused on conducting site characterization.

History

The Utica Mine Site operated on the Inmachuk drainage from 1903 into the 1980s. The collective area was a placer gold mine with at least four dredges identified and evidence of hydraulic operations. The Utica Mine Camp Site included facilities for equipment maintenance shop, power generation, storage, and personnel housing and cooking.

Dredge tailings, the mineral and gravel materials which are displaced by dredge activities, are considered to remain intact in their naturally occurring physical state (pebbles, cobbles, granulation, etc.) without alteration to their mineral state beyond physical weathering. The majority of the mine camp site is believed to be built on leveled dredge tailings. Assay wastes, defined as crushed and concentrated mineral materials, are believed at this time to have only been disposed of in the immediate vicinity of AOC 2 – the former gold house.

The former Utica Mine Camp Site was determined by the Alaska Department of Environmental Conservation Contaminated Sites Department (ADEC - CS) in 2005 to meet the site and owner eligibility criteria for both the federal and State of Alaska definitions of a brownfield: thus making the site eligible for federal brownfield funding.

In 2005 the ADEC–CS contracted SLR Alaska (SLR) to perform a Phase I Environmental Site Assessment (ESA) to identify areas of concern (AOCs). The ESA concluded that petroleum and heavy metals were present in surface soils as well as potential presence of mercury in surface and ground water (SLR, 2007). The site reconnaissance was limited; the interior of buildings 7, 16, 19, and 21 as well as the north and south dumps were identified as impacted by petroleum and heavy metals. Additionally, ground under other buildings were suspected of petroleum contamination (not specifically identified by building number) and other areas in camp (not specifically identified) devoid of vegetation or composed of piles of soil fines were noted as locations with potential contamination.

Following the ESA by SLR, Travis/Peterson Environmental Consultants, Inc. (TPECI) performed a limited site characterization and vehicle fluids removal in 2007 (TPECI, 2007). TPECI conducted a series of activities from 2008 to 2010 (TPECI, 2008 2009, and 2011), including various remedial actions and additional investigation and characterizations. From these past efforts a list of the identified AOCs with their associated COPCs were developed (Table 1).

Table 1 Identified AOCs and COPCs

AOC	Location	COPC
1	Power House	DRO
2	Gold House	DRO, lead, arsenic, chromium, selenium, silver, and mercury in the tailings piles
3	Machinist Shop	GRO, BTEX/VOC, DRO, RRO, arsenic, cadmium, chromium, mercury, and lead in the Machinist Shop footprint along with chromium to the west of the shop
4	South Dump	DRO, RRO
5	Bunkhouse	Chromium and mercury near northeast corner
6	Carpenter Shed	Mercury in soil within building footprint
7	Inmachuk River	Metals in sediment but not in surface water
8	Soil Stockpiles	DRO, metals
9	Pond	POL, BTEX, PAH, metals
10	Background	Metals

Archaeological Monitoring

The known use of the area by humans extends beyond one hundred years, with little archaeological, cultural, or historical surveying or documentation known and some local concerns expressed at community meetings. Consequently, an Archaeological Monitoring Plan was developed and followed for ground disturbing work. As detailed in the Archaeological Monitoring Report (Appendix A), monitoring was specifically conducted at AOCs 3, 5, 6, 7, 9, and 10. This consisted of the archaeologist being present when test pits were hand dug and soil from these pits being hand screened for artifacts. None were encountered.

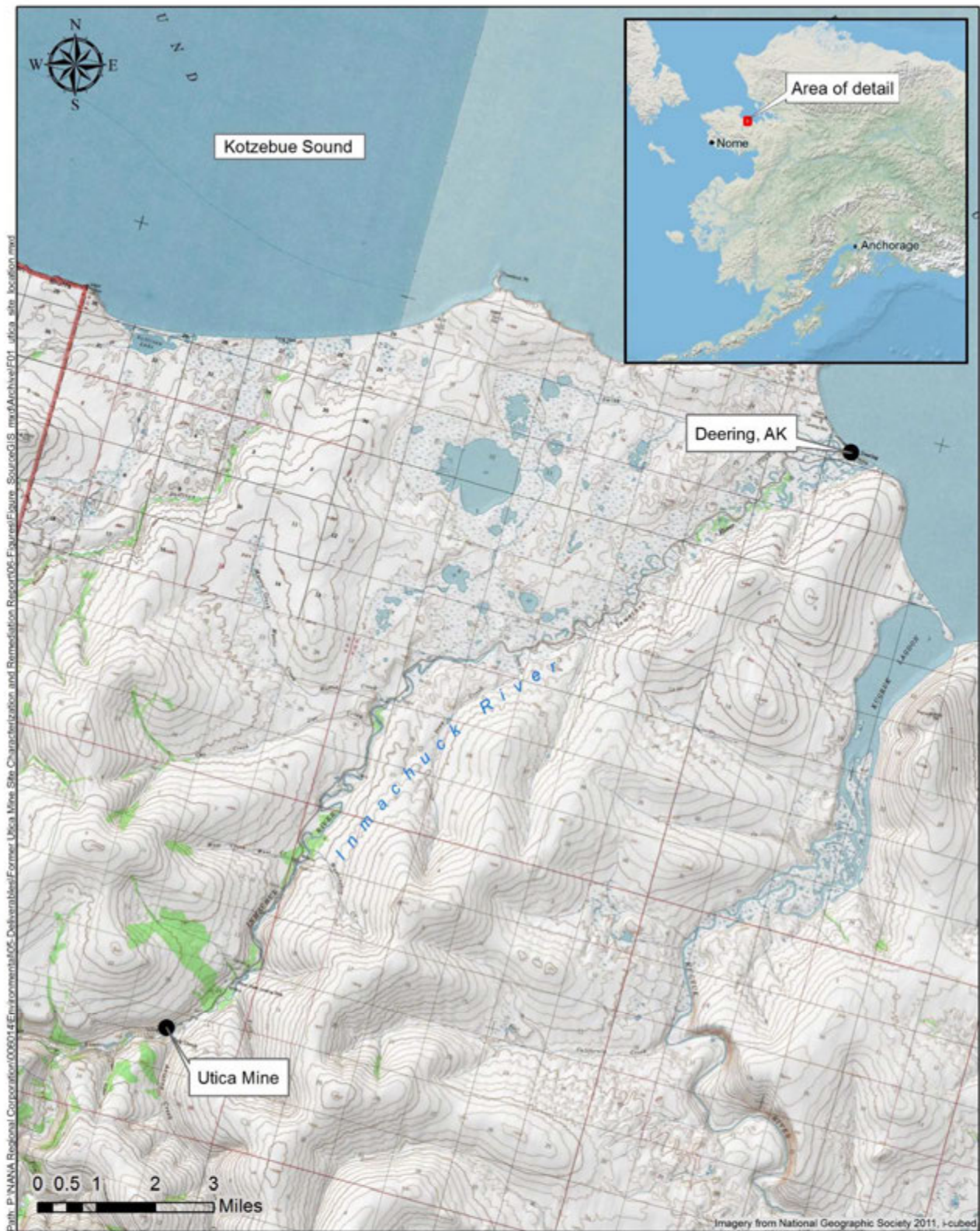
Site Location

The former mine camp site is located approximately 18 road miles southwest of Deering, Alaska (Figure 1). The site is located on the west side of the Inmachuk River which flows to the north into Kotzebue Sound. The legal description is: Township 006 North, Range 021 East, Section 24, Kateel River Meridian at approximate latitude 65°53'59.74"N and longitude 163°00'34.91"W.

Current Owner

The site is owned by NANA Regional Corporation, and currently administered by:

NANA Regional Corporation
Natural Resources Department
909 West 9th Avenue
Anchorage, AK 99501



Utica Mine Site Vicinity Map
2012 Former Utica Mine
Charaterization and Remediation Report
 November, 2012

Figure
01
 Vicinity

Cleanup Criteria

In 2011 the ADEC and NRC agreed to implement the most stringent clean up levels, generally the Under 40 Inch Zone - Migration to Groundwater (MTGW) pathway from the ADEC 18 AAC 75.341 Tables B1 and B2 for contamination in soils and 18 AAC 75.345 Table C for ground water and surface water contamination (Table 2). Surface water is additionally regulated under 18AAC 70. NRC is proposing an alternative site specific soil cleanup level based on background arsenic that has no anthropogenic source. ADEC tentatively approved a “to be considered background level” per email correspondence with NRC (Appendix F).

Table 2 Method Two - Soil and Water Clean Up Levels

COPC	Under 40 Inch Zone			Water Cleanup Level mg/L	Laboratory Method
	Ingestion mg/Kg	Inhalation mg/Kg	Migration to Ground Water mg/Kg		
GRO	1,400	1,400	300	2.2	AK 101
DRO	10,250	12,500	250	1.5	AK 102
RRO	10,000	22,000	11,000	1.1	AK 103
VOC/BTEX	variable				EPA 8260
Arsenic	4.5	nd	3.9	0.010	EPA 6020
Barium	20,300	nd	1,100	2.0	EPA 6020
Cadmium	79	nd	5	0.005	EPA 6020
Chromium	300	nd	25	0.10	EPA 6020
Lead	400	nd	400	0.015	EPA 6020
Mercury	30	18	1.4	0.002	EPA 7470
Selenium	510	nd	3.4	0.05	EPA 6020
Silver	510	nd	11.2	0.10	EPA 6020

nd = not defined on Table B-1 Method Two.

2012 Activities

Work was conducted in accordance with the 2012 Former Utica Mine Camp Site Characterization and Remediation Work Plan, including the Site Specific Health and Safety Plan (SSHSP) (Sivuniq, 2012), except deviations noted in each AOC section in this report. Table 3 below summarizes the planned tasks; locations are shown on Figure 2.

Table 3 Task Summary of the Former Utica Mine Site

Location	Sample Analyses	Task Summary
General	None	<ul style="list-style-type: none"> • Mobilize to site • Initial site reconnaissance: inspect AOCs and equipment • Site survey, establish site control, define sample areas • Set up staging and decontamination areas
Site Characterization of Previously Identified Areas of Concern		
AOC 1 Power House	GRO, DRO, RRO, BTEX	<ul style="list-style-type: none"> • Soil sample collection to delineate extent of contamination remaining at previous excavation • Complete excavation and stockpile soil • Backfill excavation with clean fill
AOC 2 Gold House	GRO, DRO, RRO, BTEX, Metals	<ul style="list-style-type: none"> • Screen soil at building footprint to delineate extent of contamination • Excavate and stockpile contaminated soil • Collect confirmation samples from bottom of excavation and sidewalls • Backfill excavation with clean fill
AOC 3 Machinist Shop	GRO, DRO, RRO, BTEX/VOC, PAH, Metals	<ul style="list-style-type: none"> • Earthen floor sample collection • Institutional controls: permanently close building interior • Soil sample collection outside structure to delineate extent of contamination • Collect samples from over pack drums containing liquid waste • Prepare drums for off-site transport
AOC 4 South Dump	GRO, DRO, RRO, BTEX	<ul style="list-style-type: none"> • Soil sample collection in south dump site surface soil footprint
AOC 5 Bunkhouse	Metals	<ul style="list-style-type: none"> • Soil sample collection to delineate metals contamination near bunkhouse 10
AOC 6 Carpenter Shed	Metals	<ul style="list-style-type: none"> • Soil sample collection in footprint of the former shed location and to the northwest of the building to delineate contamination
AOC 7 Inmachuk River Bank	GRO, DRO, RRO, BTEX, PAH, Metals	<ul style="list-style-type: none"> • Characterize surface soils and sediment to the west of the river bank to evaluate potential contaminant migration into Inmachuk River

AOC 8 Soil Stockpiles	GRO, DRO, RRO, BTEX, PAH, metals	<ul style="list-style-type: none"> Collect samples from five stockpiles to determine whether soils can be used as “clean” backfill or should be moved to land farm, or staged for disposal.
Site Characterization of New Areas of Concern		
AOC 9 Possible Settling Pond	GRO, DRO, RRO, BTEX, PAH, Metals	<ul style="list-style-type: none"> Collect soil samples around perimeter, surface water and sediment samples at center to characterize water and sediment
Baseline Monitoring		
Area 10 Background Metals	Metals	<ul style="list-style-type: none"> Collect samples from areas upstream of Site with similar elevation and geology to assess naturally occurring background concentrations of metals
Site Remediation Activities		
Land Farm	N/A	<ul style="list-style-type: none"> Construct land farm for on-site remediation of POL contaminated soils Transport previously stockpiled POL soils to land farm
General	None	<ul style="list-style-type: none"> Demobilize personnel, equipment, and materials



First Site Reconnaissance

WHPacific conducted an initial site reconnaissance on June 28, 2012 to determine the current state of the site. A photographic and global positioning system (GPS) survey was completed of the various AOCs (Appendix B). The site consisted of eighteen buildings in various states of dilapidation situated along a loop off the main road up the Inmachuck River. The site slopes gently to the south-southeast towards the river. The area of the site was approximately 7.5 acres, much of which appeared to be former tailings piles graded to provide leveled areas for buildings and mining activities.



View of the Utica Mine Camp Site looking north July 12, 2012

Specific confirmation was made of location and conditions of the former machinist shop, bunkhouses, dump areas, monofill, and mine support buildings. The state of the stockpile covers was confirmed. The presence of the powerhouse excavation was confirmed. The photographic survey documented several drum containers, batteries, and equipment abandoned at the site. A later review of the survey in Anchorage, showed abandoned 72 pound mercury flasks.

Second Site Reconnaissance

On July 12, 2012 WHPacific performed a second site reconnaissance. Objectives were to confirm the contents of the mercury flasks, collect background samples, determine the best access to the site, and best location for the field team encampment. A concurrent effort was undertaken in Deering to interview local residents about the past history of the Utica Mine Camp Site; a community information meeting concerning the Utica work plans was also conducted.

The condition of the AOC 9 potential settling pond was photographed to determine the sampling methods required. The mercury containers were found to be empty. The airstrip approximately one half mile north of the Utica Mine Camp Site was found to be usable for small aircraft. The road to Deering was passable for four wheeler all-terrain vehicles. However, a washout was discovered to be impassable for road vehicles.



The washout on the Deering to Utica road view looking south on 9/2012

The background samples of AOC 10 were collected on July 12, 2012 and transported to the laboratory for the analyses of natural metal constituents. The results are discussed in the AOC 10 section of this report.

September Field Work

WHPacific mobilized six field scientists and an NRC representative to the Utica Mine Camp Site on September 8, 2012. The field crew encampment was set up near the airstrip to keep living and cooking areas separate from the work site. At the work site, a staging area for equipment and supplies was set up in Building #1. Site controls and restrictions were established through communication with the community and warning tape where appropriate. Bear guards were on duty 24 hours a day.

Upon arrival at the site, the field team performed a video survey at the time of initial entry for the purpose of documenting the site conditions "As Found".

The ten AOCs are addressed in numerical order in this report. However, during the actual field effort the AOCs were addressed in the following order: AOC 8, 1, 4, 3, 5, 6, 7, 3, and 2. The logistics of crew availability, delivery of the laboratory samples to turn around results for on-site use, and transportation of personnel and samples were the primary reasons for the order of work. Each section briefly describes the condition of the AOC when WHPacific arrived to perform field work, details the characterization work performed, documents remedial efforts performed, discusses any deviations from the work plan, and summarizes work remaining and future actions. Tables, figures, and passages of the text may not include all non-detected values. The complete laboratory reports are located in Appendix C.

Field screening for metals, especially mercury (Hg), was conducted at several AOCs according to the work plan. Part of the goal of this screening technique was to examine the usefulness of this tool in future remediation efforts. The results of the field screening compared to the laboratory results for Hg across all AOCs are shown in Table 4 and discussed below.

The concentration of Hg in soils was too low for detection at most sites. The gold house, machinist shop, Inmachuk River, and stockpiles had Hg concentrations high enough for detection by the Niton XRF. There was low direct correlation between small concentrations of Hg found through laboratory analysis, and the concentrations detected by the Niton XRF. While the highest field and lab results were detected at the gold house, the lower detected concentrations do not correlate consistently. This is likely due to the sensitivity of the instrument to the uniformity of the material being analyzed. Soil samples, even between similarly disturbed and proximal locations, have a high degree of variability. Overall, the Niton XRF would be useful for situations in which there are large concentrations of Hg in the samples. Definite quantitation of the concentration of Hg is not attainable through field analysis.

Table 4 Niton XRF and Laboratory Range of Results for Hg by AOC

Site	Laboratory Range, mg/Kg	Niton XRF Range, ppm
AOC1 Power House	0.0344-0.124	None
AOC2 Gold House	0.0594-84.3	<LOD-161.73
AOC3 Machinist Shop	0.045-1.37	<LOD-29.07
AOC5 Bunkhouse	0.0411-0.197	<LOD
AOC6 Carpenter Shed	0.0191-0.0808	<LOD
AOC7 Inmachuk River	0.0295-0.305	<LOD-9.07
AOC8 Stockpiles	0.0258-2.97	<LOD-7.07
AOC 9 Settling Pond	0.0198-0.863	None
AOC 10 Background	0.0197-0.0445	None

Table 5 summarizes the samples collected for laboratory analysis during the field efforts and the specific analyses requested. The location of each sample and their results are discussed for each AOC in the following sections.

Table 5 Utica Mine Site Analytic Samples Collected and Requested Analyses

SAMPLE ID		LAB SAMPLE ID	Collected Date & Time	AK 101	AK 102	AK 103	SW 8260B	8270D SIMS	SW 6020	SW 7471B
AOC 1	1209UTIO101	112438 4001	09/11/20 12 11:59	x	x	x	x		x	
	1209UTIO101MS	112438 4002	09/11/20 12 11:59	x	x	x	x		x	
	1209UTIO101MSD	112438 4003	09/11/20 12 11:59	x	x	x	x		x	
	1209UTIO102	112438 4004	09/11/20 12 11:53	x	x	x	x		x	
	1209UTIO103	112438 4005	09/11/20 12 11:51	x	x	x	x		x	
	1209UTIO104	112438 4006	09/11/20 12 11:45	x	x	x	x		x	
	1209UTIO105 Duplicate of 1209UTIO104	112438 4007	09/11/20 12 11:46	x	x	x	x		x	
	1209UTIO106	112438 4008	09/11/20 12 17:17	x	x	x	x		x	
	1209UTIO107	112438 4009	09/11/20 12 17:15	x	x	x	x		x	
	1209UTIO108	112438 4010	09/11/20 12 17:13	x	x	x	x		x	
1209UTIO109	112438 4011	09/11/20 12 17:11	x	x	x	x		x		
AOC 2	1209UTIO201-0	112459 6001	09/20/20 12 11:30						x	
	1209UTIO201-1	112459 6002	09/20/20 12 12:55						x	
	1209UTIO201-2	112459 6003	09/20/20 12 13:02						x	
	1209UTIO202-0	112459 6004	09/20/20 12 11:25						x	
	1209UTIO202-OMS	112459 6005	09/20/20 12 11:25						x	
	1209UTIO202-OMSD	112459 6006	09/20/20 12 11:25						x	
	1209UTIO202-1	112459 6007	09/20/20 12 13:22						x	
	1209UTIO202-2	112459 6008	09/20/20 12 13:29						x	

SAMPLE ID	LAB SAMPLE ID	Collected Date & Time	AK 101	AK 102	AK 103	SW 8260B	8270D SIMS	SW 6020	SW 7471B
1209UTI0203-1	112459 6009	09/20/20 12 14:52						x	
1209UTI0203-2	112459 6010	09/20/20 12 15:02						x	
1209UTI0204-0	112459 6011	09/20/20 12 11:40						x	
1209UTI0204-1	112459 6012	09/20/20 12 15:10						x	
1209UTI0204-2	112459 6013	09/20/20 12 15:19						x	
1209UTI0204-2MS	112459 6014	09/20/20 12 15:19						x	
1209UTI0204-2MSD	112459 6015	09/20/20 12 15:19						x	
1209UTI0205-0	112459 6016	09/20/20 12 11:45						x	
1209UTI0205-1	112459 6017	09/20/20 12 15:10						x	
1209UTI0205-2	112459 6018	09/20/20 12 15:15						x	
1209UTI0206-0	112459 6019	09/20/20 12 11:52						x	
1209UTI0206-1	112459 6020	09/20/20 12 15:04						x	
1209UTI0206-2	112459 6021	09/20/20 12 15:12						x	
1209UTI0207-0	112459 6022	09/20/20 12 12:06						x	
1209UTI0207-1	112459 6023	09/20/20 12 15:22						x	
1209UTI0207-2	112459 6024	09/20/20 12 15:29						x	
1209UTI0208-0	112459 6025	09/20/20 12 12:15						x	
1209UTI0208-2	112459 6026	09/20/20 12 14:51						x	
1209UTI0209-0	112459 6027	09/20/20 12 12:12						x	
1209UTI0209-1	112459 6028	09/20/20 12 12:19						x	
1209UTI0209-2	112459 6029	09/20/20 12 12:27						x	

SAMPLE ID	LAB SAMPLE ID	Collected Date & Time	AK 101	AK 102	AK 103	SW 8260B	8270D SIMS	SW 6020	SW 7471B
	1209UTI0210-0	112459 6030	09/20/20 12 11:39					x	
	1209UTI0210-1	112459 6031	09/20/20 12 12:37					x	
	1209UTI0210-2	112459 6032	09/20/20 12 14:42					x	
AOC 3	1209UTI0301	112459 7001	09/19/20 12 14:43	x	x	x	x	x	
	1209UTI0302	112459 7002	09/19/20 12 14:46	x	x	x	x	x	
	1209UTI0302MS	112459 7003	09/19/20 12 14:46	x	x	x	x	x	
	1209UTI0302MSD	112459 7004	09/19/20 12 14:46	x	x	x	x	x	
	1209UTI0303	112459 7005	09/19/20 12 14:51	x	x	x	x	x	
	1209UTI0304	112459 7006	09/19/20 12 14:54	x	x	x	x	x	
	1209UTI0305	112459 7007	09/19/20 12 14:58	x	x	x	x	x	
	1209UTI0306	112459 7008	09/19/20 12 15:01	x	x	x	x	x	
	1209UTI0307	112459 7009	09/19/20 12 15:10	x	x	x	x	x	
	1209UTI0308	112459 7010	09/19/20 12 15:12	x	x	x	x	x	
	1209UTI0309	112459 7011	09/19/20 12 15:16	x	x	x	x	x	
	1209UTI0310	112459 7012	09/19/20 12 15:18	x	x	x	x	x	
	1209UTI0311	112459 7013	09/19/20 12 15:22	x	x	x	x	x	
	1209UTI0312	112459 7014	09/19/20 12 15:25	x	x	x	x	x	
	1209UTI0313	112459 7015	09/19/20 12 15:26	x	x	x	x	x	
	1209UTI0314	112459 7016	09/19/20 12 15:32	x	x	x	x	x	
1209UTI0315-3	112443 6001	09/16/20 12 15:55	x	x	x	x	x		
1209UTI0316-3	112443 6002	09/16/20 12 16:00	x	x	x	x	x		

SAMPLE ID	LAB SAMPLE ID	Collected Date & Time	AK 101	AK 102	AK 103	SW 8260B	8270D SIMS	SW 6020	SW 7471B
1209UTI0317-3	112443 6003	09/16/20 12 16:05	x	x	x	x		x	
1209UTI0318-3	112443 6004	09/16/20 12 16:15	x	x	x	x		x	
1209UTI0319-2	112443 6005	09/16/20 12 16:14	x	x	x	x		x	
1209UTI0319-3	112443 6006	09/16/20 12 16:12	x	x	x	x		x	
1209UTI0320-0	112443 6007	09/16/20 12 16:54	x	x	x	x		x	
1209UTI0320-1	112443 6008	09/16/20 12 16:50	x	x	x	x		x	
1209UTI0320-2	112443 6009	09/16/20 12 16:47	x	x	x	x		x	
1209UTI0320-3	112443 6010	09/16/20 12 16:44	x	x	x	x		x	
1209UTI0321-3	112443 6011	09/16/20 12 16:32	x	x	x	x		x	
1209UTI0321-3MS	112443 6012	09/16/20 12 16:32	x	x	x	x		x	
1209UTI0321-3MSD	112443 6013	09/16/20 12 16:32	x	x	x	x		x	
1209UTI0322-3 Duplicate of 1209UTI0321	112443 6014	09/16/20 12 16:31	x	x	x	x		x	
1209UTI0323 Duplicate of 1209UTI0313	112459 7017	09/19/20 12 15:27	x	x	x	x		x	
AOC 4	1209UTI401	112443 7001	09/11/20 12 16:55	x	x	x	x		
	1209UTI402	112443 7002	09/11/20 12 17:00	x	x	x	x		
	1209UTI403	112443 7003	09/11/20 12 17:06	x	x	x	x		
	1209UTI404	112443 7004	09/11/20 12 17:25	x	x	x	x		
	1209UTI405	112443 7005	09/11/20 12 17:40	x	x	x	x		
	1209UTI406	112443 7006	09/11/20 12 16:20	x	x	x	x		

SAMPLE ID	LAB SAMPLE ID	Collected Date & Time	AK 101	AK 102	AK 103	SW 8260B	8270D SIMS	SW 6020	SW 7471B
	1209UTI407	112443 7007	09/11/20 12 16:25	x	x	x	x		
	1209UTI408	112443 7008	09/11/20 12 16:30	x	x	x	x		
	1209UTI409	112443 7009	09/11/20 12 16:40	x	x	x	x		
	1209UTI410	112443 7010	09/11/20 12 16:45	x	x	x	x		
	1209UTI411 Duplicate of 1209UTI410	112443 7011	09/11/20 12 16:46	x	x	x	x		
AOC 5	1209UTI0501-1	112443 7012	09/14/20 12 12:31					x	
	1209UTI0501-2	112443 7013	09/14/20 12 12:29					x	
	1209UTI0502-1	112443 7014	09/14/20 12 12:36					x	
	1209UTI0502-2	112443 7015	09/14/20 12 12:34					x	
	1209UTI0503-1	112443 7016	09/14/20 12 12:39					x	
	1209UTI0503-2	112443 7017	09/14/20 12 12:37					x	
	1209UTI0504-1 Duplicate of 1209UTI0503-1	112443 7018	09/14/20 12 12:40					x	
AOC 6	1209UTI0601-1	112443 7019	09/14/20 12 12:58					x	
	1209UTI0601-2	112443 7020	09/14/20 12 12:54					x	
	1209UTI0602-1	112443 7021	09/14/20 12 13:01					x	
	1209UTI0602-2	112443 7022	09/14/20 12 13:00					x	
	1209UTI0603-1	112443 7023	09/14/20 12 13:06					x	
	1209UTI0603-2	112443 7024	09/14/20 12 13:04					x	
	1209UTI0604-1	112443 7025	09/14/20 12 12:47					x	

SAMPLE ID	LAB SAMPLE ID	Collected Date & Time	AK 101	AK 102	AK 103	SW 8260B	8270D SIMS	SW 6020	SW 7471B
1209UTI0604-2	112443 7026	09/14/20 12 12:45						x	
1209UTI0605-1 Duplicate of 1209UTI0603-1	112443 7027	09/14/20 12 13:07						x	
AOC 7	1209UTI0701	112443 6015	09/16/20 12 11:57	x	x	x	x		x
	1209UTI0702	112443 6016	09/16/20 12 12:02	x	x	x	x		x
	1209UTI0702MS	112443 6017	09/16/20 12 12:02	x	x	x	x		x
	1209UTI0702MSD	112443 6018	09/16/20 12 12:02	x	x	x	x		x
	1209UTI0703	112443 6019	09/16/20 12 12:09	x	x	x	x		x
	1209UTI0704	112443 6020	09/16/20 12 12:14	x	x	x	x		x
	1209UTI0705	112443 6021	09/16/20 12 12:25	x	x	x	x		x
	1209UTI0706	112443 6022	09/16/20 12 11:59	x	x	x	x		x
	1209UTI0707	112443 6023	09/16/20 12 12:05	x	x	x	x		x
	1209UTI0708	112443 6024	09/16/20 12 12:12	x	x	x	x		x
	1209UTI0709	112443 6025	09/16/20 12 12:15	x	x	x	x		x
	1209UTI0710	112443 6026	09/16/20 12 12:21	x	x	x	x		x
	1209UTI0711	112443 6027	09/16/20 12 12:31	x	x	x	x		x
	1209UTI0712	112443 6028	09/16/20 12 13:02	x	x	x	x		x
	1209UTI0713	112443 6029	09/16/20 12 13:08	x	x	x	x		x
1209UTI0714	112443 6030	09/16/20 12 12:39	x	x	x	x		x	
1209UTI0715	112443 6031	09/16/20 12 12:45	x	x	x	x		x	

SAMPLE ID	LAB SAMPLE ID	Collected Date & Time	AK 101	AK 102	AK 103	SW 8260B	8270D SIMS	SW 6020	SW 7471B
1209UTI0716 Duplicate of 1209UTI0709	112443 6032	09/16/20 12 12:15	x	x	x	x		x	
1209UTI0717 Duplicate of 1209UTI07014	112443 6033	09/16/20 12 12:40	x	x	x	x		x	
AOC 8 Stockpiles	1209UTI0801	112431 0001	09/09/20 12 15:38	x	x	x	x		x
	1209UTI0802	112431 0002	09/09/20 12 15:39	x	x	x	x		x
	1209UTI0803	112431 0003	09/09/20 12 15:40	x	x	x	x		x
	1209UTI0804	112431 0004	09/09/20 12 15:43	x	x	x	x		x
	1209UTI0804MS	112431 0005	09/09/20 12 15:43	x	x	x	x		x
	1209UTI0804MSD	112431 0006	09/09/20 12 15:43	x	x	x	x		x
	1209UTI0805	112431 0007	09/09/20 12 15:06	x	x	x	x		x
	1209UTI0806	112431 0008	09/09/20 12 15:07	x	x	x	x		x
	1209UTI0807	112431 0009	09/09/20 12 15:15	x	x	x	x		x
	1209UTI0808	112431 0010	09/09/20 12 15:16	x	x	x	x		x
	1209UTI0809	112431 0011	09/09/20 12 14:58	x	x	x	x		x
	1209UTI0810	112431 0012	09/09/20 12 14:53	x	x	x	x		x
	1209UTI0811	112431 0013	09/09/20 12 14:58	x	x	x	x		x
	1209UTI0812	112431 0014	09/09/20 12 14:56	x	x	x	x		x
	1209UTI0813	112431 0015	09/09/20 12 15:03	x	x	x	x		x
1209UTI0814	112431 0016	09/09/20 12 16:15	x	x	x	x		x	
1209UTI0815	112431 0017	09/09/20 12 16:12	x	x	x	x		x	

SAMPLE ID	LAB SAMPLE ID	Collected Date & Time	AK 101	AK 102	AK 103	SW 8260B	8270D SIMS	SW 6020	SW 7471B
	1209UTI0816	112431 0018	09/09/20 12 16:10	x	x	x	x		x
	1209UTI0817	112431 0019	09/09/20 12 16:25	x	x	x	x		x
	1209UTI0817MS	112431 0020	09/09/20 12 16:25	x	x	x	x		x
	1209UTI0817MSD	112431 0021	09/09/20 12 16:25	x	x	x	x		x
	1209UTI0818	112431 0022	09/09/20 12 16:16	x	x	x	x		x
	1209UTI0819	112431 0023	09/09/20 12 16:18	x	x	x	x		x
	1209UTI0820	112431 0024	09/09/20 12 15:23	x	x	x	x		x
	1209UTI0821	112431 0025	09/09/20 12 15:34	x	x	x	x		x
	1209UTI0822	112431 0026	09/09/20 12 15:29	x	x	x	x		x
	1209UTI0823	112431 0027	09/09/20 12 15:03	x	x	x	x		x
AOC9	1209UTIP00901SD	112431 0028	09/09/20 12 15:45	x	x	x	x	x	x
	1209UTIP00902SD	112431 0029	09/09/20 12 16:00	x	x	x	x	x	x
	1209UTIP00903SD	112431 0030	09/09/20 12 16:05	x	x	x	x	x	x
	1209UTIP00904SD	112431 0031	09/09/20 12 16:10	x	x	x	x	x	x
	1209UTIP0B0901SD	112431 0032	09/10/20 12 18:10	x	x	x	x	x	x
	1209UTIP0B0902SD	112431 0033	09/10/20 12 18:20	x	x	x	x	x	x
	1209UTIP00901SW	112438 4013	09/10/20 12 12:51	x	x	x	x	x	x
	1209UTIP00902SW	112438 4014	09/10/20 12 13:40	x	x	x	x	x	x
	1209UTIP00903SW	112438 4015	09/10/20 12 16:50	x	x	x	x	x	x
	1209UTIP00904SW	112438 4016	09/10/20 12 17:15	x	x	x	x	x	x
1209UTIRI0901SW	112438 4017	09/11/20 12 10:15						x	

SAMPLE ID	LAB SAMPLE ID	Collected Date & Time	AK 101	AK 102	AK 103	SW 8260B	8270D SIMS	SW 6020	SW 7471B
1209UTIRI0902SW	112438 4018	09/11/20 12 10:30						x	
AOC 10	0712UTI01	112299 0001	07/12/20 12 11:05					x	x
	0712UTI02	112299 0002	07/12/20 12 11:30					x	x
	0712UTI03	112299 0003	07/12/20 12 11:40					x	x
	0712UTI04	112299 0004	07/12/20 12 12:30					x	x
	0712UTI05	112299 0005	07/12/20 12 13:05					x	x
	0712UTI05MS	112299 0006	07/12/20 12 13:05					x	x
	0712UTI05MSD	112299 0007	07/12/20 12 13:05					x	x
	0712UTI06	112299 0008	07/12/20 12 13:40					x	x
	0712UTI07	112299 0009	07/12/20 12 13:55					x	x
	0712UTI08	112299 0010	07/12/20 12 14:15					x	x
	0712UTI09	112299 0011	7/12/201 2 12:30					x	x

"x" denotes sample collected for analyses in 2012

AOC 1 - Former Power House

The Former Power House (Building #21) was previously demolished and its footprint excavated to approximately 6 feet below ground surface (bgs) by TPECI in 2008 and 2009. The extent of the site characterization and the remedial efforts by TPECI was incomplete with analytical sample results of 453 and 297 mg/kg of diesel range organics (DRO) identified on the western edge of the building's footprint (Figure 3).

WHPacific was tasked to complete the site characterization and remedial effort. The effort was separated into four phases:

- field screening the surface of the sidewalls and floor of the TPECI excavation,
- field screening four test pits at step out locations of the western edge of the footprint,
- advancing excavation, if required, to obtain clean margins, and
- collecting confirmation samples for closure.

Field Effort

During the first site reconnaissance, WHPacific noted that the excavation had either been partially backfilled or the walls had undergone extensive collapse.

On September 11, 2012 WHPacific conducted field screenings with a photoionization detector (PID) of the floor and sidewalls of the former powerhouse previously excavated by TPECI. The results of 30 screening samples ranged from 0.1 to 56.5 parts per million (ppm). The highest value was identified in a localized area of the floor near the southeast wall.

Four test pits were dug to a target depth of 6 feet bgs with an excavator along the northwest wall of the TPECI excavation. The sample locations were a step out to the northwest of the previous TPECI sample locations to further define the extent of contamination. Once the excavator reached the target depth, field screening samples from side walls at approximate depths of 3 feet and 6 feet (the bottom of the excavation) were collected directly from the excavator bucket. The screening sample results were below 1.1 ppm. Four primary samples, a field duplicate sample, and a matrix spike and matrix spike duplicate (MS/MSD) pair were collected for laboratory analyses of GRO, DRO, RRO, BTEX, and metals.

Samples were identified as 1209UTI0101 through 1209UTI0105. The burden from each test pit was replaced in the excavation.

An excavation of the floor near the corner of the southeast wall was advanced guided by the highest PID field screenings (Figure 3 brown polygon). Approximately 5 cubic yards (CY) of soil were removed and stockpiled at the south east edge of the excavation on a 20 mil woven liner to meet the specifications of 18 AAC 75.370. Margins of this excavation, referred to as the “2012 Sivuniq/WHPacific excavation” on Figure 3, were field screened with PID results of 0 to 0.4 ppm. Three confirmation samples were collected from the excavation floor and walls, 1209UTI0106 through 1209UTI0108. One sample was collected from the stockpile, 1209UTI0109. The four samples were included with the test pit samples for laboratory analyses of GRO, DRO, BTEX and metals.

Further work on this AOC had to be postponed due to malfunctioning equipment. The stockpiled soil was covered securely with a 6 mil reinforced polyethylene top cover. Soils will be land farmed in a future field season. The excavation was secured with steel fence posts, orange safety fencing, and caution tape to restrict access until further remedial action can be accomplished.



AOC 1 excavation fencing, looking north, as left by the WHPacific Field Crew on 9/23/2012

Laboratory Analyses Results

Results from the analytical samples collected at AOC 1 are summarized in Table 6 and Figure 3. Results that exceeded clean up levels are highlighted in yellow. Sample results indicate that one of the four test

pits near the road had levels of DRO above the ADEC cleanup level of 250 mg/kg (269 mg/kg, sample location #0104). Although the ADEC guidance requires the use of the higher result of the primary and duplicate samples, it is noted that the duplicate sample (#0105) for measuring field precision at that test pit had a lower DRO result (200 mg/kg), with an acceptable level of precision of 29% relative difference.

The test pits were originally intended to characterize and refine any further contamination extent (based on previous TPECI work), while the floor and wall samples were intended to confirm existing excavation extents were ready for backfill and closure. Field screening revealed one hot spot on the floor, which was excavated, and subsequent field screening of the excavation indicated the area was ready for confirmation sampling. These sample results were above DRO clean up level of 250 mg/kg (#0106 = 350 and #0107 = 333 mg/kg; Figure 3) despite their low field screening results.

The laboratory samples had measurable concentrations of one or more metals. However, the analysis results indicate that the concentrations of all metal COCs were either below the most conservative ADEC Method Two cleanup level or are comparable to or less than the background levels proposed to the ADEC by NRC as a result of the 2012 AOC 10 background study.

Table 6 AOC 1 Utica Mine Site Former Power House Analytical Results

ANALYTE	Units	METHOD	ADEC Cleanup Level	1209 UTI 0101	1209 UTI 0102	1209 UTI 0103	1209 UTI 0104	1209 UTI0105 Duplicate of 1209 UTI0104	Duplicate Pair RPD	1209 UTI 0106	1209 UTI 0107	1209 UTI 0108	1209 UTI 0109 Stockpile 7
Gasoline Range Organics	mg/Kg	AK101	300	ND	ND	ND	ND	ND	NC	ND	ND	ND	1.7 J
Diesel Range Organics	mg/Kg	AK102	250	39.4	89.4	23.1	269	200	29	350	333	13.7 J	1000
Residual Range Organics	mg/Kg	AK103	11000	188	511	146	233	163	35	414	252	52.1	462
Benzene	mg/Kg	SW8260B	0.025	ND	ND	ND	ND	ND	NC	ND	ND	ND	ND
Ethylbenzene	mg/Kg	SW8260B	6.9	ND	ND	ND	ND	ND	NC	ND	ND	ND	ND
o-Xylene	mg/Kg	SW8260B	63 (total)	ND	ND	ND	ND	ND	NC	ND	ND	ND	ND
P & M - Xylene	mg/Kg	SW8260B		ND	ND	ND	ND	ND	NC	ND	ND	ND	ND
Toluene	mg/Kg	SW8260B	6.5	ND	ND	ND	0.0395 J	0.0267 J	36	ND	ND	ND	ND
Arsenic	mg/Kg	SW6020	3.9	29.4	19.5	23.3	29.8	18.8	45	22.6	21.6	25.1	12.6
Barium	mg/Kg	SW6020	1100	33.2	48.7	50.9	62.4	35.3	55	60.1	29.4	32.8	43.9
Cadmium	mg/Kg	SW6020	5	0.285	0.282	0.351	0.419	0.346	19	0.425	0.297	0.262	0.198 J
Chromium	mg/Kg	SW6020	25	6.55	9.81	8.75	8.79	8.29	6	12.4	8.23	8.05	8.36
Lead	mg/Kg	SW6020	400	15.9	10.4	16.1	43.2	24.1	57	13.5	9.28	10	9.99
Mercury	mg/Kg	SW6020	1.4	0.124	0.0427 J	0.0941	0.0773	0.0836	8	0.0344 J	0.0409	0.0437	0.0424 J
Selenium	mg/Kg	SW6020	3.4	0.377 J	0.446 J	0.55 J	0.468 J	0.55	16	0.646	0.499 J	1.31	0.424 J
Silver	mg/Kg	SW6020	11.2	0.0535 J	0.0434 J	0.0536 J	0.0411 J	0.0466 J	13	0.0574 J	0.043 J	0.0546 J	0.0346 J

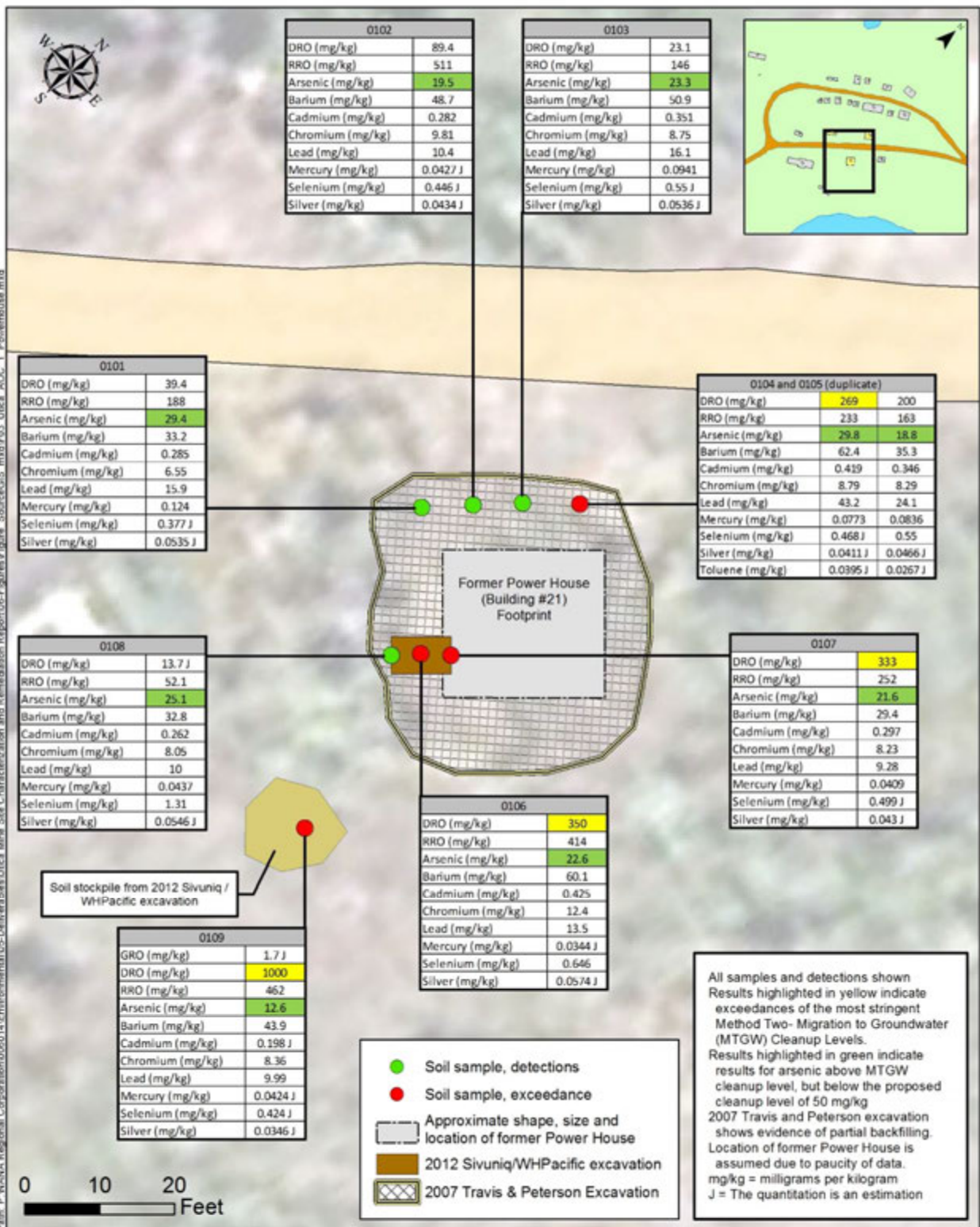
NC= Not calculated, ND = not detected, J=estimated concentration, RPD = relative percent difference

RPDs are calculated between the primary and duplicate analyses presented in the preceding columns; QA failures are highlighted in green

Yellow shaded cells indicate the exceedance of ADEC clean up levels.

ADEC Table B1. Method Two - Soil Cleanup Level, Migration to Groundwater

Path: P:\NANA_Regional_Corporation\00014\Environmental\05-Deliverables\Utica Mine Site Characterization and Remediation Report\06-Figures\Figures-SourceOS - muf\F03_Utica_AOC_1_Powerhouse.mxd



**Power House (AOC 1) Analytical Samples
2012 Former Utica Mine
Characterization and Remediation Report
April, 2013**

Figure
03
Power House
AOC 1

Deviations from the Work Plan

The lack of operational heavy equipment curtailed field efforts to complete the proposed remedial action at AOC 1.

Discussion

The levels of contamination remaining at the AOC 1 Former Power House excavation are above the most stringent levels of ADEC soil cleanup where ground water may be impacted. During 2012 site operations it was noted the nature of the soils at the Utica site are of sorted mine tailings and ground water was not encountered at the excavation depth of 8 feet bgs.

The method two cleanup level for under 40 inch zone ingestion pathway may be protective of site workers with a DRO cleanup level of 10,250 mg/Kg. The contamination is in a localized area over 8 feet bgs and less than 5 x 10 foot surface area. WHPacific estimates an approximate volume of 2 cubic yards of contaminated soil. Once the excavation is backfilled, there will be minimal contact pathway with buried contaminated soil remaining in place below the 10,250 mg/kg level.

Remaining Work

Work left to complete includes further excavation of the AOC 1 site hotspots already identified or no additional excavation if the cleanup level is changed to 10,250 mg/kg. Confirmation sample collection for closure will be required before backfill is completed. If soil is removed it will require internment in a land farm constructed with lined berms, bottom liner, and cover. Soil will need to be transported to the land farm and spread in six inch lifts (in accordance with the DEC approved work plan for 2012). The land farmed soil will require periodic tilling and testing for contaminant reduction. Final closure request will be made once analyses prove the soil remediated.

AOC 2- Former Gold House

The Former Gold House (Building #17) was demolished and the remains were burned in 2008 or 2009. When WHPacific examined AOC 2 in June of 2012 there was a pile of disturbed soil of unknown origin that was intermixed with burned wooden building remnants, machinery consistent with small mill operations, and three mercury flasks.



Westward facing view of AOC 2 on 7/12/2012

Past efforts to characterize the metals contamination at AOC 2 were not successful in delineating the vertical and horizontal extent of contamination and resulting in miscellaneous data gaps. WHPacific personnel mobilized with an X-ray Fluorescence (XRF) metal specific field detector to build a correlation with laboratory analyses. The objective to fill the data gaps was accomplished on September 19, 2012

Field Work

WHPacific used a Niton brand XRF detector to perform 104 field screenings of the surface soils focusing on the area of disturbed soil at AOC 2. Locations were determined with a precision GPS unit and presented in Figure 4.

Analytical soil samples were collected at levels from surface to two feet bgs in ten test pits advanced by hand (surface=0, 1' bgs, and 2' bgs). The collected samples (25 primary; table 5) were submitted for laboratory analysis of metals (arsenic, barium, cadmium, chromium, lead, mercury, selenium and silver). Three duplicate samples and one MS/MSD sample were collected for data quality purposes.



View looking north of AOC 2 on 9/19/2012.

The empty mercury flasks were containerized in plastic tubs for transport offsite. To limit the spread of contaminated soils due to wind-blown dust or water infiltration, the area of disturbed soil was covered with 6 mil reinforced polyethylene liner material pending analytical results and possible removal action.

Bevill Amendment

The contaminated soils from this AOC were exempted by the Environmental Protection Agency (EPA) in 2011 under the Bevill Amendment 40 CFR 261.4 (b)(7) from designation as RCRA hazardous waste due to their direct association with the mining, beneficiation, and/or processing of ores. The Bevill amendment is not an exemption of ADEC remedial requirements. The documentation for the EPA exemption is provided in Appendix E.

Laboratory Analyses Results

The results from the 28 analytical samples taken from AOC 2 are summarized in Table 7. The detectable concentrations are depicted on Figure 5.

Concentrations of arsenic ranged from 10.8 to 228 mg/Kg in the Gold House samples and exceeded the ADEC method two migration to ground water cleanup level of 3.9 mg/Kg.

Mercury was detected in seven of the ten test pits at concentrations above the most stringent ADEC method two migration to ground water cleanup level of 1.4 mg/kg. Test Pits 03, 04, 05, and 07 had concentrations exceeding the cleanup level of mercury at the deepest depth sampled. Two of these

Test Pits (04 and 07), were located in the debris pile of soil near the road at the east side of AOC 2. TPECI documents do not identify this piled soil and it was not documented as a stockpile. Test Pit 01 is approximately 17 feet uphill and to the north of the area of disturbed soil and the burnt remains of the former Gold House, suggesting contamination was not limited to the building's footprint. One possibility is that Gold House waste products could have been graded into the surrounding area when they had accumulated into a stockpile so large that it hindered operations.

The ADEC lead cleanup level of 400mg/kg was exceeded from soils in Test Pit 08, where detected levels were 2980 mg/kg. The remaining samples yielded results with detectable levels of lead below the cleanup levels.

All samples exhibited detectable levels of chromium, while Test Pit 01 had the highest chromium result of 26.9 mg/kg, exceeding the ADEC method two migration to ground water cleanup level of 25 mg/kg.

Table 7 AOC 2 Utica Mine Site Former Gold House Analytical Samples

ANALYTE	Arsenic	Barium	Cadmium	Chromium	Lead	Mercury	Selenium	Silver
Units	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg
ANALYTICAL METHOD	SW6020	SW6020	SW6020	SW6020	SW6020	SW6020	SW6020	SW6020
ADEC Cleanup level (mg/Kg)	3.9	1100	5	25	400	1.4	3.4	11.2
Sample ID								
1209UTI0201-0	27.3	75.8 J	0.256	14.2 J	97.4	2.77	0.536 J	0.0664 J
1209UTI0201-1	15.1	142 J	0.107 J	20 J	24	0.842	0.654 J	0.0665 J
1209UTI0201-2	10.8	189 J	ND	26.9 J	14.4	0.398	0.72	0.0774 J
1209UTI0202-0	58.9	44.2	0.368	13.1	36.9	4.97	0.388 J	0.0745 J
1209UTI0202-1	21.4	23.5 J	0.22	8.03 J	8.15	0.152	0.361 J	ND
1209UTI0202-2	13.4	18.3 J	0.201	6.23 J	8.67	0.279	0.215 J	ND
1209UTI0203-1	189	43	0.407	13.2	391	84.3	0.601	0.911
1209UTI0203-2	42.3	44	0.264	8.54	56.8	27.8	0.179 J	0.113
1209UTI0204-0	50.4	57.5	0.385	15.1	252	11.6	0.515	0.499
1209UTI0204-1	55.7	54.2	0.556	10.6	272	22.8	0.601	0.666
1209UTI0204-2	40.8	31.7	0.365	8.15	130	9.76	0.501 J	0.253
1209UTI0205-0	67.9	49.9	0.331	13.4	253	32.7	0.659	0.562
1209UTI0205-1	18.8	43.8	0.338	11.9	17.2	1.36	0.281 J	0.0431 J

ANALYTE	Arsenic	Barium	Cadmium	Chromium	Lead	Mercury	Selenium	Silver
1209UTI0205-2	23.1	35	0.208	9.09	15.5	2.85	0.349 J	0.0425 J
1209UTI0206-0	18.6	76.8	0.571	20.2	65.7	0.575	0.548 J	0.0619 J
1209UTI0206-1	21.2	79.5	0.56	13.1	79.9	0.531	0.45 J	0.0402 J
1209UTI0206-2	31.4	99.5	0.353	8.41	50.9	0.696	0.411 J	ND
1209UTI0207-0	100	44.3	0.801	10.4	175	64.7	0.557 J	0.676
1209UTI0207-1	27	40.7	0.292	11.7	14.2	2.5	0.439 J	0.0397 J
1209UTI0207-2	40.2	47.6	0.226	9.58	25.7	5.4	0.416 J	0.0673 J
1209UTI0208-0	228	75.3	0.64	19.9	2980	42	1.09	6.36
1209UTI0208-2	60	27.3	1	10.5	74.4	0.857	0.497 J	0.0903 J
1209UTI0209-0	19.7	32.5	0.288	8.26	70.8	0.419	0.47 J	0.0669 J
1209UTI0209-1	13.1	37.2	0.15 J	9.8	6.65	0.0708	0.524	ND
1209UTI0209-2	31.6	66.5	0.294	10.9	12.4	0.0594	0.492 J	0.0435 J
1209UTI0210-0	25.8	43.6	0.412	11.2	47.6	1.22	0.436 J	0.0826 J
1209UTI0210-1	15.9	63.2	0.246	7.84	16.5	0.144	0.259 J	ND
1209UTI0210-2	20.9	29.1	0.356	8.59	10.6	0.0971	0.574	ND

The sample ID suffix "-0, -1, and -2" indicates sample collected at surface, one foot deep, and two feet deep.

Yellow shaded cells indicate the exceedance of ADEC clean up levels.

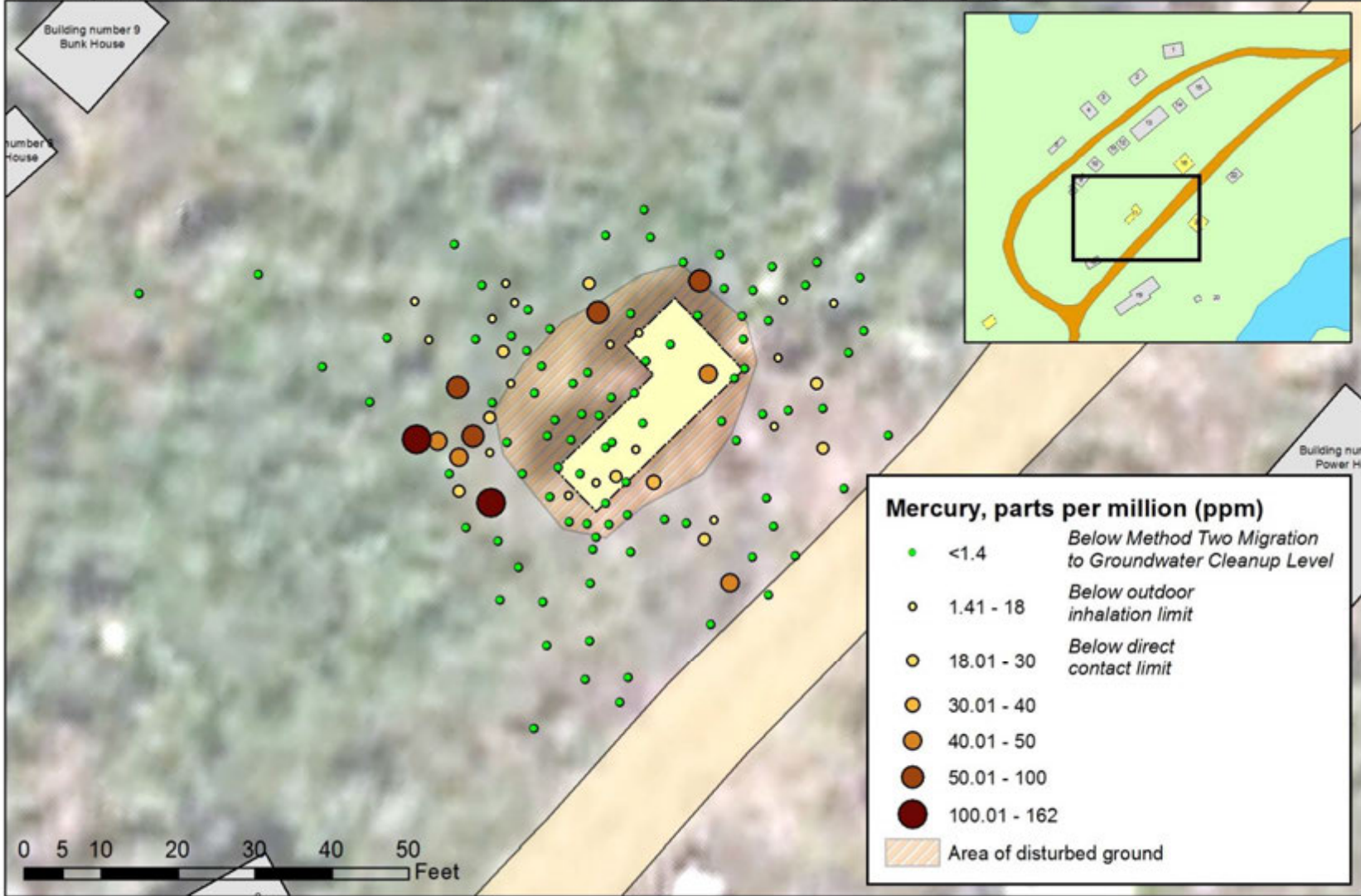
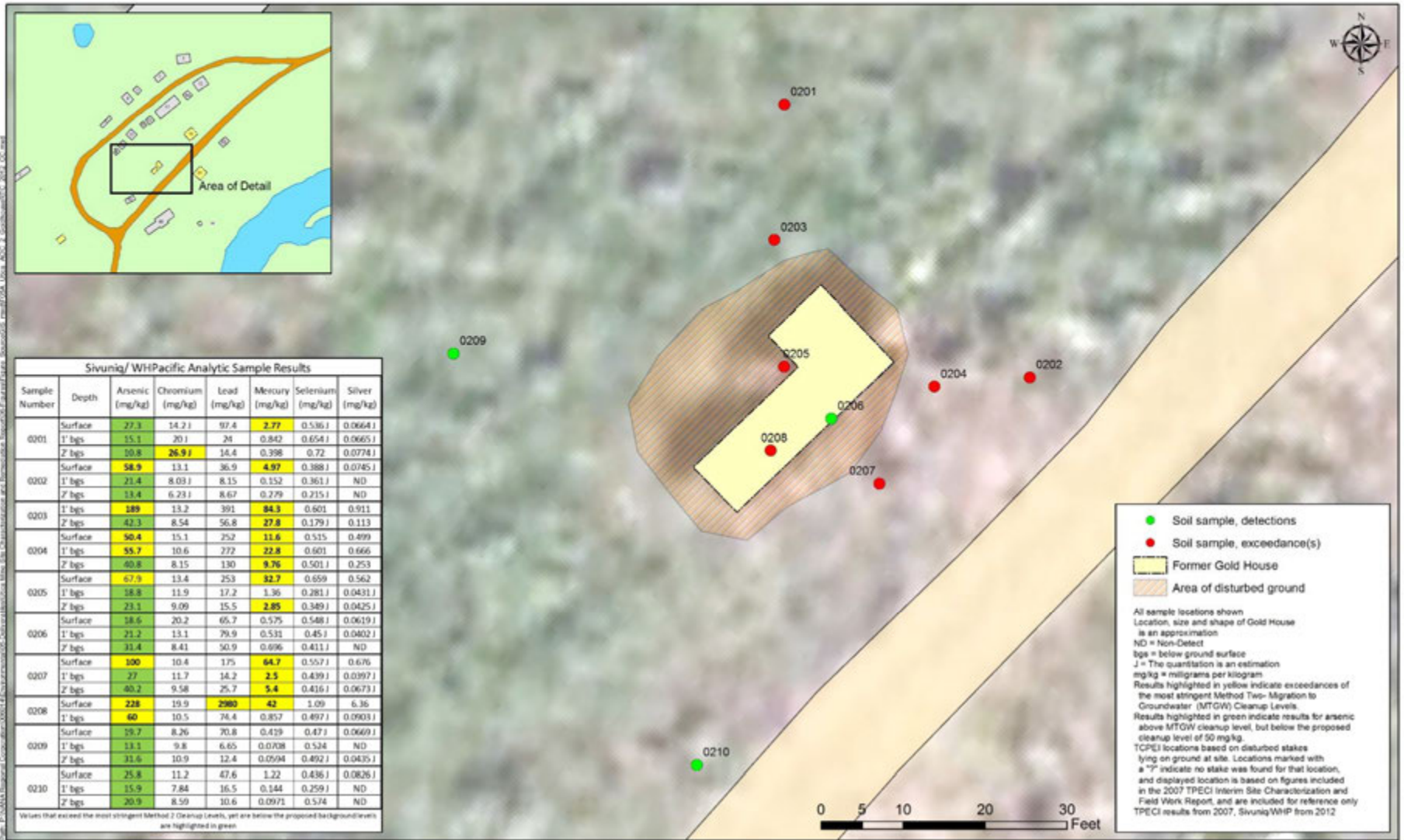


Figure
04
 Gold House
 AOC 2
 March 13

Gold House (AOC 2) Field Screening Results (Surface Soils)
 2012 Former Utica Mine
 Characterization and Remediation Report
 April, 2013



Deviations from the Work Plan

The lack of suitable heavy equipment hindered both the characterization effort and made the containerization of the large volumes of soils which had already been characterized as contaminated above cleanup levels impractical.

Discussion

The Former Gold House was located across the Utica Mine Camp Site road from AOC 1, the Former Power House. The grade of the location and the soils were consistent with AOC 1. Groundwater below AOC 2 would be expected to be similar to AOC 1, greater than eight feet deep.

The extent of elevated levels of arsenic and lead at the Former Gold House were generally within the area of mercury contamination. Both the 2012 and the historical analyses results have indicated that there are few locations where another metal exceedance was observed and mercury was not. Therefore, eliminating the exposure risk for mercury would likely simultaneously eliminate the majority of the potential risks associated with other metal contaminant exceedances.

When compared with the historical mercury concentrations, presented in the 2012 Sivunig Utica Work Plan Figure 5, the extent of contamination at AOC 2 remains undetermined in the northern and eastern directions. However, field screening and analytical results indicate the vertical mercury concentrations decrease with depth potentially indicating a surface release with little downward progression.

Remaining Work

Remaining work at the Gold House is contingent upon pending decisions. A remedial excavation of soils with chromium, mercury and lead content would be a volume estimated at greater than 300 CY.

AOC 3- Machinist Shop

The 2005 SLR Phase 1 identified four locations where petroleum contamination was evident. The 2011 site characterization by TPECI included the analyses of residual range hydrocarbons from floor soil samples of the Machinist Shop. Further analyses were not completed. WHPacific was tasked to complete a site investigation of the AOC 3 Machinist shop floor and surrounding area with preference towards the Inmachuck River to determine the presence of offsite migration.

The Machinist Shop has a packed earth floor throughout most of the structure. Wooden floors are limited to an attached small parts room on the northwestern end of the building and against the eastern wall of the Machinist Shop main room. Inside the Machinist shop, WHPacific found several areas of surface staining on the earthen portions of the floor. Machinery and tools including a parts washer, oxygen generator, a large press and a large metal lathe were found inside. A structural assessment of the building has not been completed. The roof is in poor condition and the windows are missing glass yet the structure actively sheds precipitation.

Field Work

On September 16, 2012 seven test pits were advanced by hand to collect samples of the interior floor for field screening. Archaeological monitoring was conducted at this site during excavation. A PID was used to perform the field screenings at one foot intervals between the surface and three feet bgs. The field screening readings ranged from 0.3 to 24.5 ppm. Samples were collected from the highest PID reading for further laboratory analyses (24 primary for AOC 3; table 5). Two duplicate samples and two MS/MSD samples were collected from AOC 3 for data quality purposes. The Machinist Shop laboratory samples were analyzed for GRO, DRO, RRO, BTEX and metals content.

Test Pit 20 was excavated immediately in front of the parts washer. Analytical soil samples were collected at the surface and at one, two and three feet bgs. The sample analyses of Test Pit 20 included the POL and metals analyses with the addition of a full list of volatile compounds (VOC) representative of solvent use, samples 1209UTI0320-0 to 1209UTI0320-23.

On September 19, 2012 outside of the Machinist Shop, WHPacific advanced 14 test pits by hand to the depth of two feet bgs. Samples were collected and field screened and analytic samples were collected from the highest PID result. One MS/MSD sample and one duplicate sample were collected from the

soils surrounding the Machinist Shop for data quality purposes. The samples were submitted to a laboratory for DRO, GRO, BTEX, and metals analysis

Machinist shop test pits inside and outside were backfilled with the soils removed from each test pit once sample collection was completed and their locations were recorded with a precision GPS unit.

On September 9, 2012 eleven drums previously identified by the TPECI investigation were found at the south end of the Machinist shop. Three of the drums contained enough non-aqueous liquid product to collect samples. Samples were submitted to a laboratory for oil burn specification analysis



View looking north of AOC 3 on 9/19/2012.

Laboratory Analyses Results

The analytical sample results from AOC 3 are summarized in Table 8 and Figures 6 and 7. The exterior of the Machinist Shop had one result above the ADEC DRO cleanup level (250 mg/kg), 1640 mg/kg at 2 feet bgs in Test Pit 13. Test Pits 12 and 14, which are on either side of Test Pit 13, had analytical sample results of 108 and 31.2 mg/kg DRO, respectively.

Concentrations of VOCs at the location of the parts washer, Test Pit 20, were below ADEC clean up levels. However, Test Pit 20 did have a cadmium result of 8.45 mg/kg at the surface, exceeding the ADEC cleanup level of 5 mg/kg. The sample results from the interior floor of the building indicate areas of DRO and RRO contamination above ADEC cleanup levels, with results that ranged from non-detect to 17,300 mg/kg DRO and 38,700 mg/kg RRO.

One area of the inside floor, Test Pit 21 (near the northeastern wall), had a surface soil sample result of benzene at 0.083 mg/kg which is above the ADEC cleanup level of 0.025 mg/kg.

The duplicate comparisons had acceptable precision for DRO and RRO concentrations. The VOC and metals analyses precision was not an effective comparison as many of the concentrations were at or near the quantitation limits where the difference between small concentrations is magnified.

Table 8 AOC 3 Utica Mine Site Machinist Shop Analytical Results

EXTERIOR																
ANALYTE	ADEC Cleanup Level	1209 UTI 0301	1209 UTI 0302	1209 UTI 0303	1209 UTI 0304	1209 UTI 0305	1209 UTI 0306	1209 UTI 0307	1209 UTI 0308	1209 UTI 0309	1209 UTI 0310	1209 UTI 0311	1209 UTI 0312	1209 UTI 0313	1209UTI 0323 (dup of 0313)	RPD
Gasoline Range Organics	300	2.56 J	ND	2.4 J	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NC
Diesel Range Organics	250	7.72 J	7.49 J	76.5	ND	99.6	105	ND	10.5 J	17.2 J	ND	10.7 J	108	1640J	1510J	8
Residual Range Organics	11000	59.3	37.4	104	34.2	269	160	41.6	69.5	128	26.4	84.8	1170	343	398	15
Benzene	0.025	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NC
Ethyl-benzene	6.9	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NC
o-Xylene	63 (total)	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NC
P & M - Xylene		ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NC
Toluene	6.5	ND	0.0253 J	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NC
Arsenic	3.9	22.1	21	23.9	19.2	29.7	21	29.3	36	20.7	18.8	23.6	15.3	19	37	64
Barium	1100	41.7	29	34.5	34.5	40	56.1	68.6	62.3	35	33.4	37.7	34.6	16.5	27.2	45
Cadmium	5	0.255	0.209	0.252	0.239	0.357	0.319	0.331	0.42	0.27	0.2 J	0.234	0.521	0.218	0.279	25
Chromium	25	8.71	6.6	7.58	7.88	10.8	10	8.19	11.6	7.82	5.95	7.69	9.3	4.8	7.76	47
Lead	400	8.01	7.71	12.4	7.71	12.2	11.2	9.25	17.1	115	6.38	8.08	12	76.1	17.4	126
Mercury	1.4	0.0637	0.0628	0.0701	0.0502	0.0908	0.076	0.045	0.0634	0.0601	0.0193 J	0.0533	0.125	0.0523	0.0807	43
Selenium	3.4	0.395 J	0.45 J	0.521	0.349 J	0.446 J	0.625	0.484 J	0.623	0.39 J	0.388 J	0.557	0.479 J	0.308	1.01	107
Silver	11.2	0.0407 J	0.0482 J	0.0325 J	ND	0.0337 J	0.0395 J	0.0374 J	0.0412 J	0.0341 J	ND	0.0791 J	0.0366 J	ND	0.0607J	ND

INTERIOR

ANALYTE	ADEC Cleanup Level	1209	1209	1209	1209	1209	1209	1209	1209	1209	1209	1209	1209	1209	1209 UTI0322-3 Duplicate of 1209 UTI0321-3	RPD
		UTI 0314	UTI 0315-3	UTI 0316-3	UTI 0317-3	UTI 0318-3	UTI 0319-2	UTI 0319-3	UTI 0320-0	UTI 0320-1	UTI 0320-2	UTI 0320-3	UTI 0321-3			
GRO	300	ND	ND	ND	30.6 J	2.2 J	ND	ND	ND	ND	3.13	ND	ND	ND	NC	
DRO	250	31.2 J	52.7	1890	3470	69.4	21.6 J	51.5	17300 J	51.2	190	1040 J	288	248	15	
RRO	11000	248	377	5000 J	179	93.3	161	308	38700 J	123	662	3330 J	1080	1120	4	
1,1,1,2-Tetrachloroethane									ND	ND	ND	ND				
1,1,1-Trichloroethane									ND	ND	ND	ND				
1,1,2,2-Tetrachloroethane									ND	ND	ND	ND				
1,1,2-Trichloroethane									ND	ND	ND	ND				
1,1-Dichloroethane									ND	ND	ND	ND				
1,1-Dichloroethene									ND	ND	ND	ND				
1,1-Dichloropropene									ND	ND	ND	ND				
1,2,3-Trichlorobenzene									ND	ND	ND	ND				

ANALYTE	ADEC Cleanup Level	1209	1209	1209	1209	1209	1209	1209	1209	1209	1209	1209	1209	1209	1209UT10322-3 Duplicate of 1209UT10321-3	RPD
		UTI 0314	UTI 0315-3	UTI 0316-3	UTI 0317-3	UTI 0318-3	UTI 0319-2	UTI 0319-3	UTI 0320-0	UTI 0320-1	UTI 0320-2	UTI 0320-3	UTI 0321-3			
1,2,3-Trichloropropane									ND	ND	ND	ND				
1,2,4-Trichlorobenzene									ND	ND	ND	ND				
1,2,4-Trimethylbenzene									ND	ND	ND	ND				
1,2-Dibromo-3-chloropropane									ND	ND	ND	ND				
1,2-Dibromoethane									ND	ND	ND	ND				
1,2-Dichlorobenzene									ND	ND	ND	ND				
1,2-Dichloroethane									ND	ND	ND	ND				
1,2-Dichloropropane									ND	ND	ND	ND				
1,3,5-Trimethylbenzene									0.018 J	ND	0.0129 J	ND				
1,3-Dichlorobenzene									ND	ND	ND	ND				
1,3-Dichloropropane									ND	ND	ND	ND				
1,4-Dichlorobenzene									ND	ND	ND	ND				

ANALYTE	ADEC Cleanup Level	1209 UTI 0314	1209 UTI 0315-3	1209 UTI 0316-3	1209 UTI 0317-3	1209 UTI 0318-3	1209 UTI 0319-2	1209 UTI 0319-3	1209 UTI 0320-0	1209 UTI 0320-1	1209 UTI 0320-2	1209 UTI 0320-3	1209 UTI 0321-3	1209UTI0322-3 Duplicate of 1209UTI0321-3	RPD
2,2-Dichloropropane									ND	ND	ND	ND			
2-Butanone (MEK)									ND	ND	ND	ND			
2-Chlorotoluene									ND	ND	ND	ND			
2-Hexanone									ND	ND	ND	ND			
4-Chlorotoluene									ND	ND	ND	ND			
4-Isopropyltoluene									ND	ND	ND	ND			
4-Methyl-2-pentanone (MIBK)									ND	ND	ND	ND			
Benzene	0.025	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.083	ND	NC
Bromobenzene									ND	ND	ND	ND			
Bromochloromethane									ND	ND	ND	ND			
Bromodichloromethane									ND	ND	ND	ND			
Bromoform									ND	ND	ND	ND			

ANALYTE	ADEC Cleanup Level	1209	1209	1209	1209	1209	1209	1209	1209	1209	1209	1209	1209	1209	1209UT10322-3 Duplicate of 1209UT10321-3	RPD
		UTI 0314	UTI 0315-3	UTI 0316-3	UTI 0317-3	UTI 0318-3	UTI 0319-2	UTI 0319-3	UTI 0320-0	UTI 0320-1	UTI 0320-2	UTI 0320-3	UTI 0321-3			
Bromomethane									ND	ND	ND	ND				
Carbon disulfide									ND	ND	ND	ND				
Carbon tetrachloride									ND	ND	ND	ND				
Chlorobenzene									ND	ND	ND	ND				
Chloroethane									ND	ND	ND	ND				
Chloroform									ND	ND	ND	ND				
Chloromethane									ND	ND	ND	ND				
cis-1,2-Dichloroethene									ND	ND	ND	ND				
cis-1,3-Dichloropropene									ND	ND	ND	ND				
Dibromochloromethane									ND	ND	ND	ND				
Dibromomethane									ND	ND	ND	ND				
Dichlorodifluoromethane									ND	ND	ND	ND				

ANALYTE	ADEC Cleanup Level	1209	1209	1209	1209	1209	1209	1209	1209	1209	1209	1209	1209	1209	1209UTI0322-3 Duplicate of 1209UTI0321-3	RPD
		UTI 0314	UTI 0315-3	UTI 0316-3	UTI 0317-3	UTI 0318-3	UTI 0319-2	UTI 0319-3	UTI 0320-0	UTI 0320-1	UTI 0320-2	UTI 0320-3	UTI 0321-3			
Ethylbenzene	6.9	ND	0.0149 J	ND	ND	ND	ND	0.0376 J	ND	ND	ND	ND	ND	0.217	0.0262 J	157
Hexachlorobutadiene									ND	ND	ND	ND				
Isopropylbenzene (Cumene)									ND	ND	ND	ND				
Methylene chloride									ND	ND	ND	ND				
Methyl-t-butyl ether									ND	ND	ND	ND				
Naphthalene									ND	ND	ND	ND				
n-Butylbenzene									ND	ND	ND	ND				
n-Propylbenzene									0.0187 J	ND	ND	ND				
o-Xylene	63 (total)	ND	ND	ND	ND	ND	ND	0.0811	ND	ND	ND	ND	0.106	0.0514	69	
P & M -Xylene		ND	ND	ND	ND	ND	ND	0.0984 J	ND	ND	ND	ND	0.0711 J	0.0631 J	12	
sec-Butylbenzene									ND	ND	ND	ND				
Styrene									ND	ND	ND	0.0163 J				

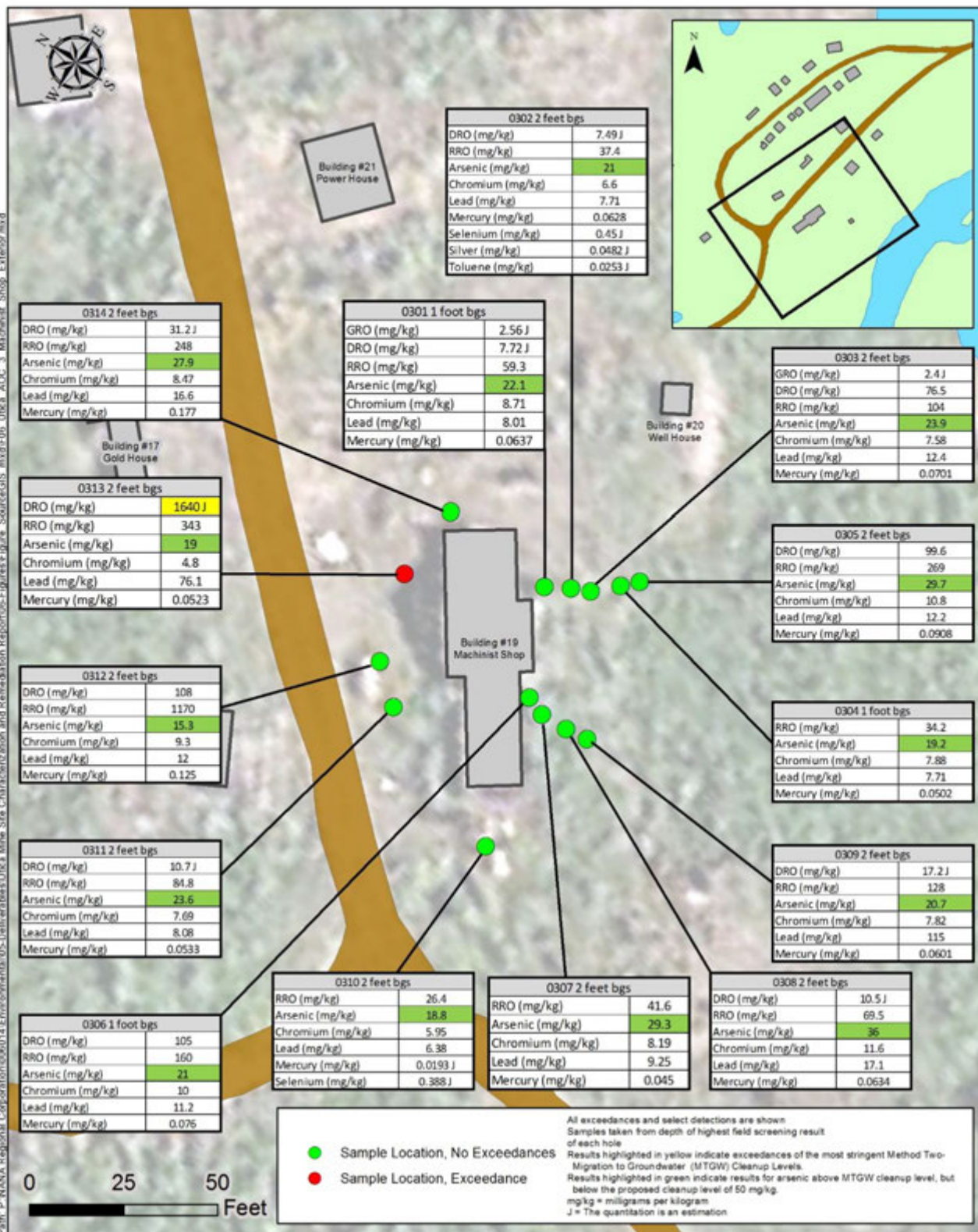
ANALYTE	ADEC Cleanup Level	1209	1209	1209	1209	1209	1209	1209	1209	1209	1209	1209	1209	1209	1209UT10322-3 Duplicate of 1209UT10321-3	RPD
		UT1 0314	UT1 0315-3	UT1 0316-3	UT1 0317-3	UT1 0318-3	UT1 0319-2	UT1 0319-3	UT1 0320-0	UT1 0320-1	UT1 0320-2	UT1 0320-3	UT1 0321-3			
tert-Butylbenzene									ND	ND	ND	ND				
Tetrachloroethene									ND	ND	ND	ND				
Toluene	6.5	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.04 J	ND	NC
trans-1,2-Dichloroethene									ND	ND	ND	ND				
trans-1,3-Dichloropropene									ND	ND	ND	ND				
Trichloroethene									ND	ND	ND	ND				
Trichlorofluoromethane									ND	ND	ND	ND				
Vinyl chloride									ND	ND	ND	ND				
Xylenes (total)	63								ND	ND	ND	ND				
Arsenic	3.9	27.9	25.5	22.9	20.7	21.5	23.5	19.9	22.7	22.7	24.5	27.1	25.6	35.8	33	
Barium	1100	24.3	45.3	55.5	38.6	47.8	51.3	57.3	112	40.5	32.7	44.4	32.1	34.9	8	
Cadmium	5	0.242	0.608	0.594	0.339	0.353	0.31	0.268	8.45	0.35	0.33	4.04	0.381	0.347	9	

ANALYTE	ADEC Cleanup Level	1209 UTI 0314	1209 UTI 0315-3	1209 UTI 0316-3	1209 UTI 0317-3	1209 UTI 0318-3	1209 UTI 0319-2	1209 UTI 0319-3	1209 UTI 0320-0	1209 UTI 0320-1	1209 UTI 0320-2	1209 UTI 0320-3	1209 UTI 0321-3	1209UTI0322-3 Duplicate of 1209UTI0321-3	RPD
Chromium	25	8.47	16.5	41.8	11.5	7.8	9.84	10.1	24	8.45	7.11	9.19	9.86	8.3	17
Lead	400	16.6	49	28.9	11.8	10.6	8.62	9.16	226	10.7	10.2	11.2	12.3	14.3	15
Mercury	1.4	0.177	0.52	0.227	0.0952	0.0671	0.103	0.125	1.37	0.104	0.118	0.073	0.123	0.14	13
Selenium	3.4	0.465 J	0.459 J	0.418 J	0.28 J	0.374 J	0.449 J	0.395 J	0.31 J	0.464 J	0.681	0.434 J	0.451 J	0.395 J	13
Silver	11.2	0.0517 J	ND	ND	ND	ND	ND	ND	0.0498 J	ND	ND	ND	ND	0.0333 J	NC

Yellow shaded cells indicate the exceedance of ADEC clean up levels

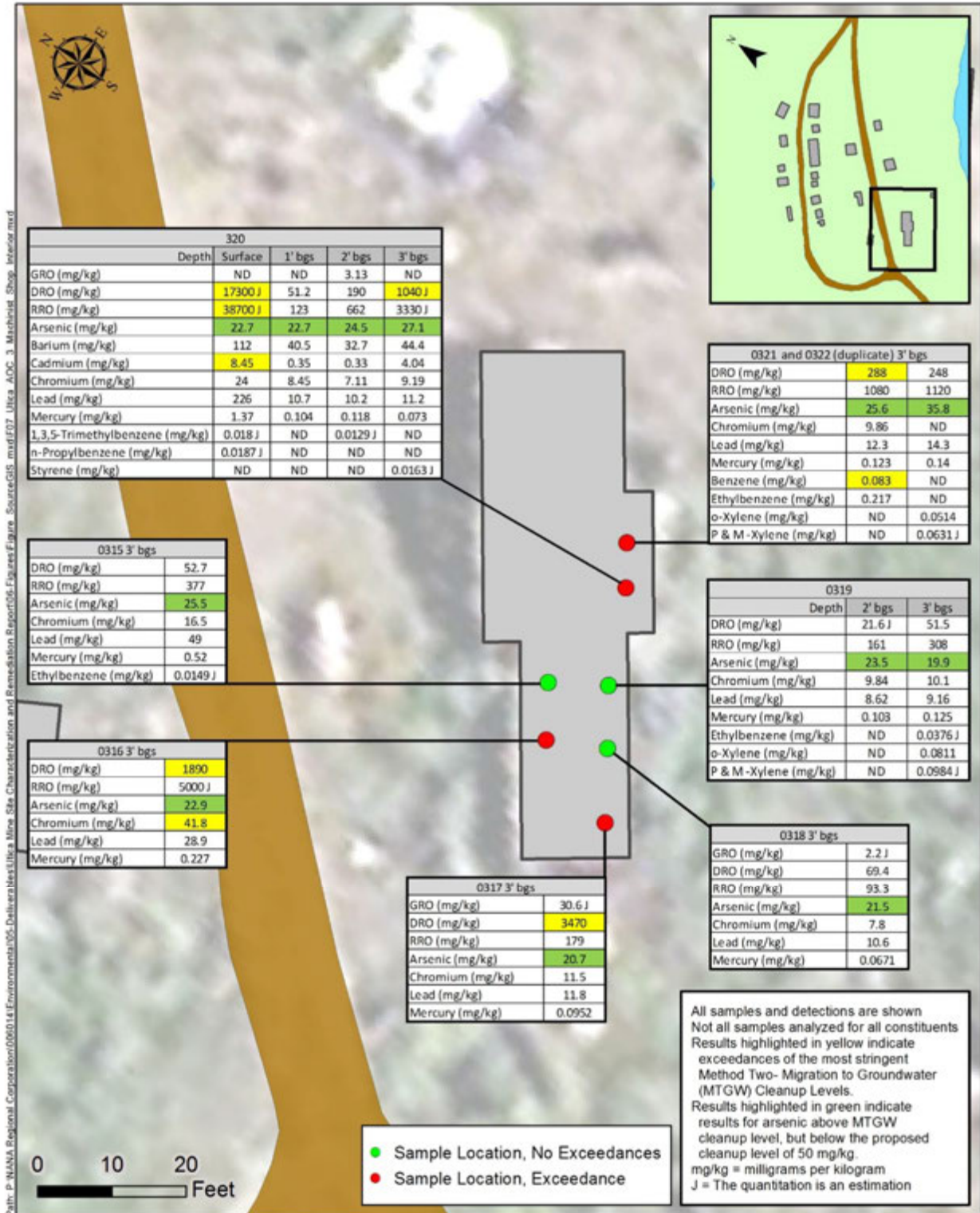
RPDs are calculated between the primary and duplicate analyses presented in the preceding columns; QA failures are highlighted in green

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**Machinist Shop (AOC 3) Exterior Samples
2012 Former Utica Mine
Characterization and Remediation Report
April, 2013**

**Figure
06
Machinist
Shop
AOC 3**



Deviations from the Work Plan

The lack of appropriate equipment for the transportation of drums precluded moving them offsite. The drums were placed on a 20 mil liner and covered with 6 mil plastic sheeting to minimize stormwater impact. Field screening of the soils under the drums was not completed as they are stored in the same location as found. The soils will be screened once the drums are moved offsite.

Discussion

The 2012 sample results of the Machinist shop interior confirm high levels of surface contamination. Specifically, the surface location of the parts washer was contaminated above the maximum allowable concentration of the ADEC Method two for both DRO and RRO at 12,500 and 22,000 mg/Kg, respectively.

Contamination of DRO at three feet bgs was confirmed at four locations inside the Machinist Shop. However, the exterior DRO concentrations at 1 to 2 feet bgs confirmed that off-site migration was not occurring from the contaminated soils within the Machinist Shop interior.

The Test Pit 13 outside of the Machinist shop was bracketed by samples that were below the ADEC DRO clean up limits. This was a localized volume of contamination and could be included in a future field remediation effort.

Remaining Work

Work remaining at AOC 3 consists of three main task categories:

- drum removal
 - Empty drum disposal can be made at the local land fill in Deering, AK.
 - Drums with contents that passed the oil burn specifications can be reused for heat recovery.
- Excavation and transportation of soils at Test Pit 13 to the landfarm for remediation.
- Restricting access of the public to the contamination remaining inside the Machinist Shop.

AOC 4- South Dump Site

On September 11, 2012 the South Dump Site was observed to have numerous automotive and heavy machine parts on site and adjacent to the area. The South Dump Site exists on a hill sloping towards the river, with an area of graded fill material on top and a sparsely vegetated steep slope terminating in a heavily vegetated area that appears to be seasonally covered in shallow surface water. The exact location of the former POL Shed (Building #7) footprint could not be identified as much of the area near the former location was disturbed by previous site activities.

Field Activities

The AOC 4 test pit locations were chosen where POL stains were evident. Five locations were chosen along the top and slope of the hill, and an additional five locations along the toe of the slope to characterize any potential down-slope transport of hydrocarbons. An additional test pit location, 0411, was identified to further characterize the extent of any potential contamination. The eleven test pits were advanced with hand shovels to a depth of two feet bgs. The soils were a heavy cobble from the surface to 2 feet bgs. The effort to collect a representative sample required the field team to sort a large volume of cobble to obtain sufficient fines. The removed soils from each test pit were field screened using a PID. The field screening results ranged from 0.2 to 7.0 ppm. The two highest field screening results were associated with soils directly beneath visible surface stains. The Test Pit 0411 soil had a PID result of 0.3 ppm, an analytical sample was not collected from this location. All other test pit locations had analytical samples collected (10 primary; table 5) from fines extending through their entire depths for GRO, BTEX, DRO and RRO analysis. One MS/MSD sample and one duplicate sample was collected from AOC 4 for data quality purposes. After the samples had been collected the test pits were backfilled with the removed soils. Sample locations were recorded with a precision GPS unit.

Laboratory Analyses Results

Test pit data is summarized in Table 9 and detectable concentrations are shown on Figure 8. The two test pit samples (1209UTI401 and 1209UTI402) adjacent to the former location of the POL shed had DRO results in exceedance of the 18 AAC 75 ADEC Method Two migration to ground water cleanup level and are highlighted in yellow. There were no further exceedances of the ADEC cleanup levels at AOC 4.

Deviations from the Work Plan

The extra test pit was dug to the south of the South Dump site to characterize the extent of contamination. The field team was required to modify sample collection of heavily cobbled soils by sorting out fines from a larger volume of material collected from the entire depth of the test pit.

Discussion

The South Dump Site, AOC 4, was found to have a minor DRO impact of soils in an area near the location of a former POL shed. There were no further concentrations of POL or BTEX constituents at or near the most stringent ADEC migration to ground water limits. Ground water was not encountered in the test pit excavations.

Remaining Work

The area appears to be sorted tailings graded level. AOC 4 is considered a potential location for a land farm. The site is accessible and requires no further preparation such as clearing and grubbing of plants or the removal of automobiles as nearby candidate sites require.

Table 9 AOC 4 Utica Mine Site South Dump Site Analytical Results

ANALYTE	Units	ADEC Cleanup Level	1209 UTI401	1209 UTI402	1209 UTI403	1209 UTI404	1209 UTI405	1209 UTI406	1209 UTI407	1209 UTI408	1209 UTI409	1209 UTI410	1209 UTI411 Duplicate of 1209 UTI410	RPD
Gasoline Range Organics	mg/kg	100	7.39	9.49	14.6	16.4	8.39	6.29	27.5	7.68	17.7	10.2	14.7	36
Diesel Range Organics	mg/Kg	250	1200	2130	ND	20.7 J	ND	ND	8.09 J	ND	54.7 J	17.8 J	31.1 J	54
Residual Range Organics	mg/Kg	11000	771	6450	ND	166	ND	30.9	52.3	25.5	578	145	300	70
Benzene	mg/Kg	0.025	ND	ND	0.0153 J	ND	ND	ND	ND	ND	ND	ND	ND	NC
Ethylbenzene	mg/Kg	6.9	ND	ND	0.0365 J	ND	ND	ND	ND	ND	ND	ND	ND	NC
o-Xylene	mg/Kg	63 (total)	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NC
P & M -Xylene	mg/Kg		ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NC
Toluene	mg/Kg	6.5	ND	ND	0.0978	0.0336 J	0.0137 J	ND	ND	ND	ND	ND	0.0422 J	NC

Yellow shaded cells indicate the exceedance of ADEC clean up levels

RPDs are calculated between the primary and duplicate analyses presented in the preceding columns; QA failures are highlighted in green

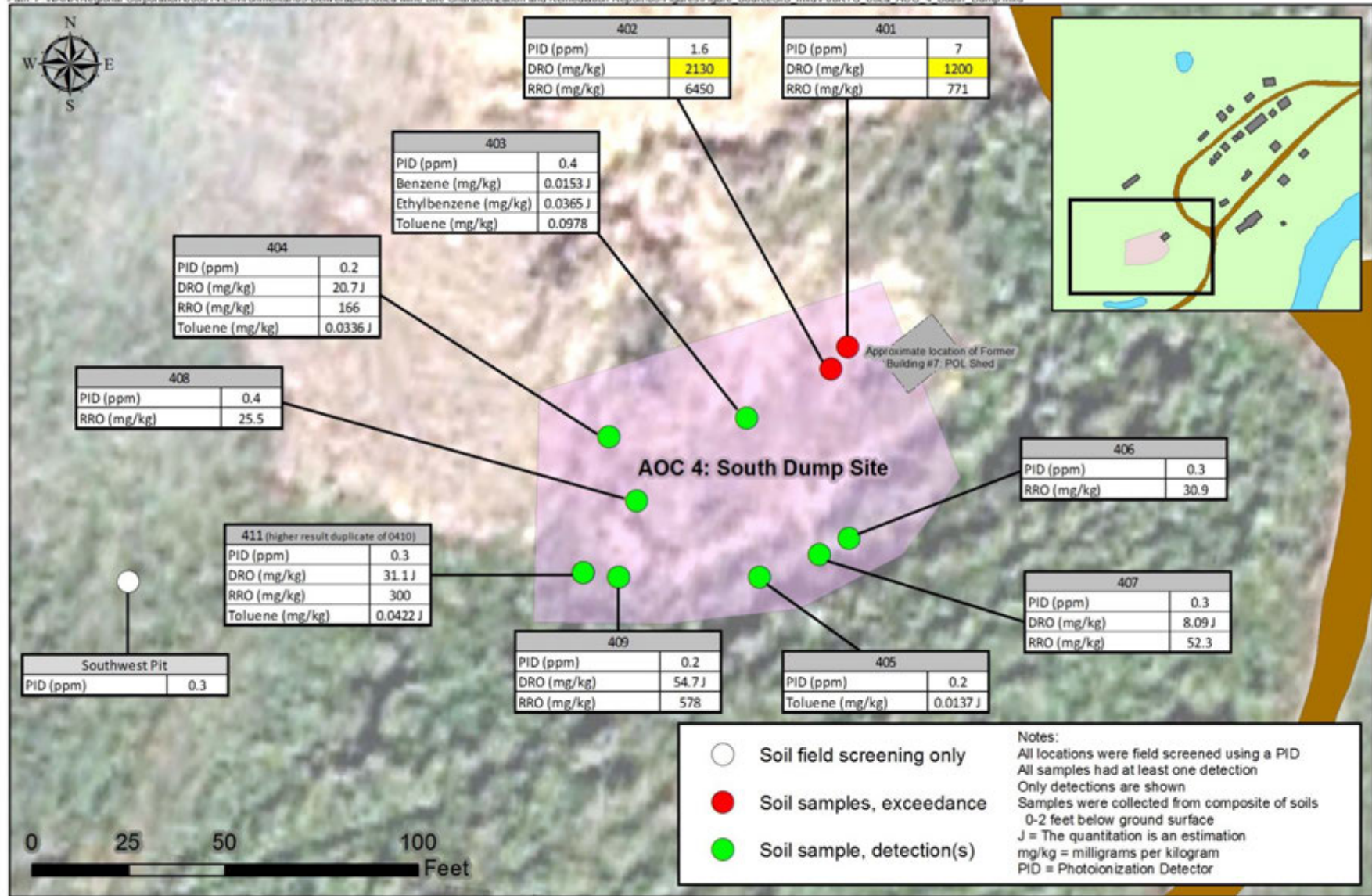


Figure 08
South Dump AOC 4

South Dump (AOC 4) Samples
 2012 Former Utica Mine
 Characterization and Remediation Report
 April, 2013



AOC 5- Bunkhouse

Buildings in the upper loop of the Utica Mine road were primarily living quarters and food preparation facilities. The AOC 5 Bunkhouse (Building #10) is a wooden structure located in this area. During the TPECI 2007 site investigation three transects across the mine Site were completed (A, B, C). Transect A identified chromium concentrations at the north east corner of this bunkhouse.

Field Activities

On September 14, 2012 three test pits were advanced by hand shovel. Archaeological monitoring was conducted at this site during excavation. The surface to a depth of approximately 6 inches was a root mat. Analytical samples (6 primary; table 5) were collected for metals at the one and two feet bgs levels, below the vegetation, of each test pit. One duplicate sample was collected at the Bunkhouse for data quality purposes.

Once sampling activities were completed, the test pits were backfilled with the removed soils and the locations of test pits collected using a precision GPS unit.

Laboratory Analyses Results

The analytical sample results from AOC 5 are summarized in Table 10. Detectable concentrations are plotted on Figure 9. The arsenic concentrations in the samples of AOC 5 were between 8.8 and 28.8 mg/Kg, above the ADEC method two migration to ground water cleanup level of 3.9mg/Kg. However, these values are comparable to the natural conditions found at the Utica Mine Camp Site and surrounding area.

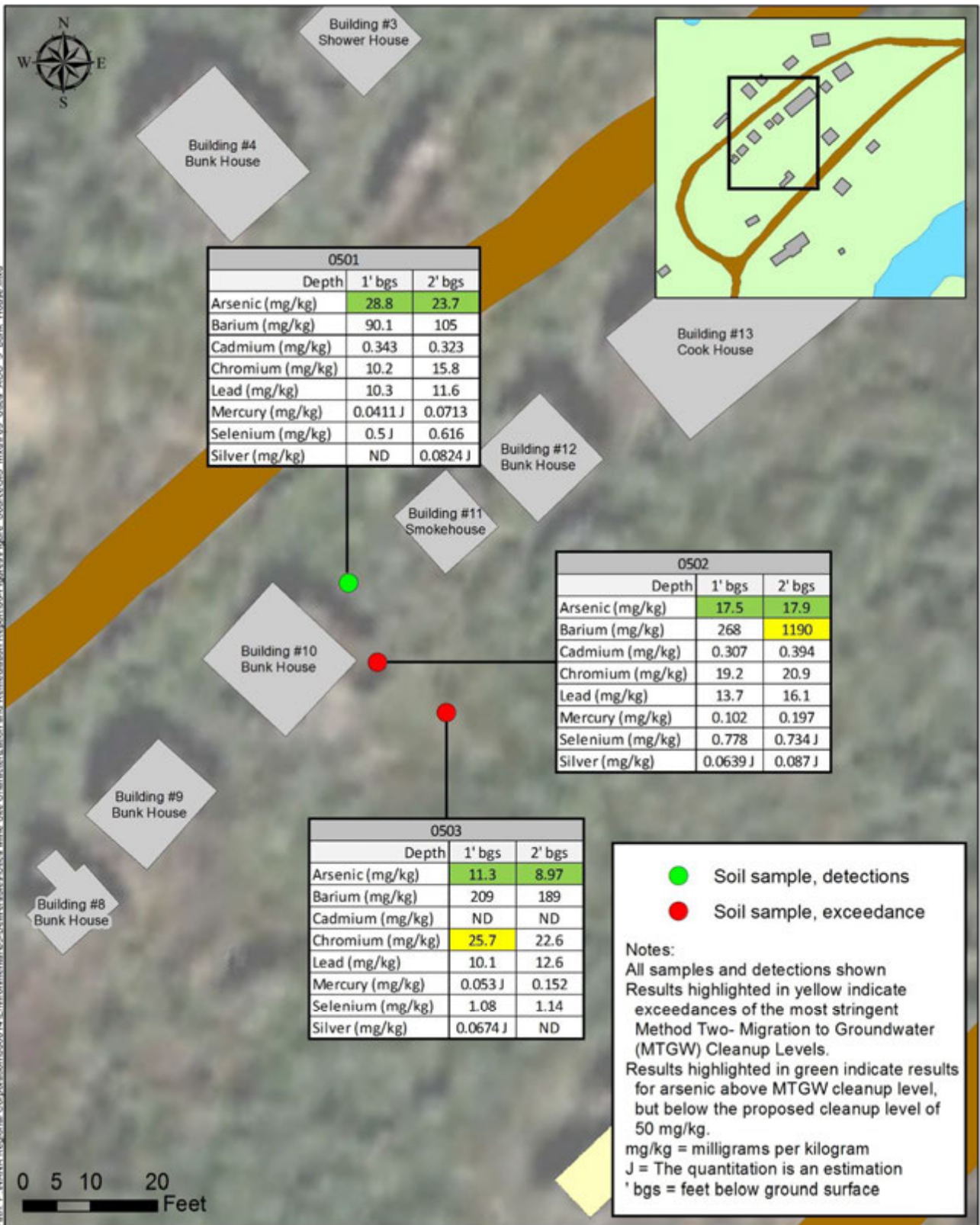
Test Pit 02 analytical results of barium at 1190 mg/kg at the depth of 2 feet bgs, exceed the cleanup level of 1100 mg/kg. In Test Pit 03, a result of 25.7 mg/kg of chromium was detected at 1 foot bgs, exceeding the cleanup level of 25 mg/kg. The field duplicate study provided an acceptable level of precision as did the MS/MSD comparisons. However, the accuracy of the matrix spikes for both barium and chromium were biased high by approximately 10% suggesting the true concentrations of barium and chromium are lower than the laboratory reported values.

Table 10 AOC 5 Bunkhouse Analytical Results

ANALYTE	Units	ADEC Cleanup Level	1209 UTI0501-1	1209 UTI0501-2	1209 UTI502-1	1209 UTI502-2	1209 UTI503-1	1209 UTI504-1 Duplicate of 1209 UTI503-1	RPD	1209 UTI503-2
Arsenic	mg/Kg	3.9	28.8	23.7	17.5	17.9	11.3	8.8	25	8.97
Barium	mg/Kg	1100	90.1	105	268	1190	209	173	19	189
Cadmium	mg/Kg	5	0.343	0.323	0.307	0.394	ND	ND	NC	ND
Chromium	mg/Kg	25	10.2	15.8	19.2	20.9	25.7	22.5	13	22.6
Lead	mg/Kg	400	10.3	11.6	13.7	16.1	10.1	9.13	10	12.6
Mercury	mg/Kg	1.4	0.0411 J	0.0713	0.102	0.197	0.053 J	0.0694 J	27	0.152
Selenium	mg/Kg	3.4	0.5 J	0.616	0.778	0.734 J	1.08	0.782 J	32	1.14
Silver	mg/Kg	11.2	ND	0.0824 J	0.0639 J	0.087 J	0.0674 J	0.0601 J	11	ND

Yellow shaded cells indicate the exceedance of ADEC clean up levels

RPDs are calculated between the primary and duplicate analyses presented in the preceding columns; QA failures are highlighted in green.



Deviations from the Work Plan

The Bunkhouse test pits were field screened for metals on September 22, 2012. Not on September 14 when the analytical samples were taken from multiple depths.

An archeological screen and review of the Bunkhouse soils was completed to determine possible cultural sensitivities. The results from this activity are included in the Archeological section.

Discussion

The chromium metal concentrations of the soils at the Bunkhouse are comparable to the natural background of the Utica area described in section AOC 10. No further action relative to chromium was considered.

The barium concentration at two feet bgs was not within the range of the AOC 10 background study barium levels and could be related to the human activities at the site. Barium is a prevalent chemical associated with many consumer goods, housing materials, and industrial uses.

Remaining Work

No further action is proposed for the AOC 5 Bunkhouse.

AOC 6 - Former Carpenter Shed

During the TPECI 2007 site investigation three transects across the mine site were completed (A, B, C). Transect B identified mercury concentrations upslope of the former carpenter shed (AOC 6). When WHPacific arrived on site, the footprint of the former carpenter shed was partially covered by stockpiles 2 and 3, which TPECI had deposited at this location.

Field Activities

On September 14, 2012 WHPacific and a contracted local equipment operator removed stockpile 2 from the building footprint. The moved soils were placed on top of a 20 mil liner, for storage, at the north end of stockpile 3. The soils were covered with a 6 mil reinforced polyethylene liner and secured.

Four test pits were advanced by hand with shovels to two feet bgs. Two test pits were in the former building footprint, and two upslope to the northwest. Removed soils were placed on a 20 mil plastic liner to minimize the spread of possible contaminants while samples were taken. Archaeological monitoring was conducted at this site during excavation. Soil samples were taken from one and two feet bgs in the four test pits (8 primary; table 5). A field duplicate sample was collected. However, these samples were batched with the AOC 5 Bunkhouse samples where the MS/MSD sample pair sufficed to measure the accuracy and precision of both AOCs. The removed soils were backfilled from their respective test pits when sample collection had concluded.

Laboratory Analyses Results

A summary of the analytical sample results for AOC 6 is provided in Table 11 with detectable results plotted in Figure 10.

The sample taken from 1 foot bgs in test pit 4 had an elevated concentration of chromium at 29.1 mg/Kg, slightly above the ADEC migration to groundwater limit of 25 mg/Kg. However, the MS/MSD pair (associated with AOC 5) with this sample batch were shown to have a high bias with true concentrations of chromium less than the laboratory result reported; the result was also comparable to background concentrations.

While detectable amounts of mercury (approximately 0.019 to 0.08 mg/kg) were found in all soil samples, none were above the ADEC migration to ground water cleanup level of 1.4 mg/kg. The sample

taken from 1 foot bgs in test pit 3 had an elevated concentration of arsenic at 77.2 mg/kg. This level was higher than found in AOC 10 background study however still comparable to local levels.

Deviation from Work Plan

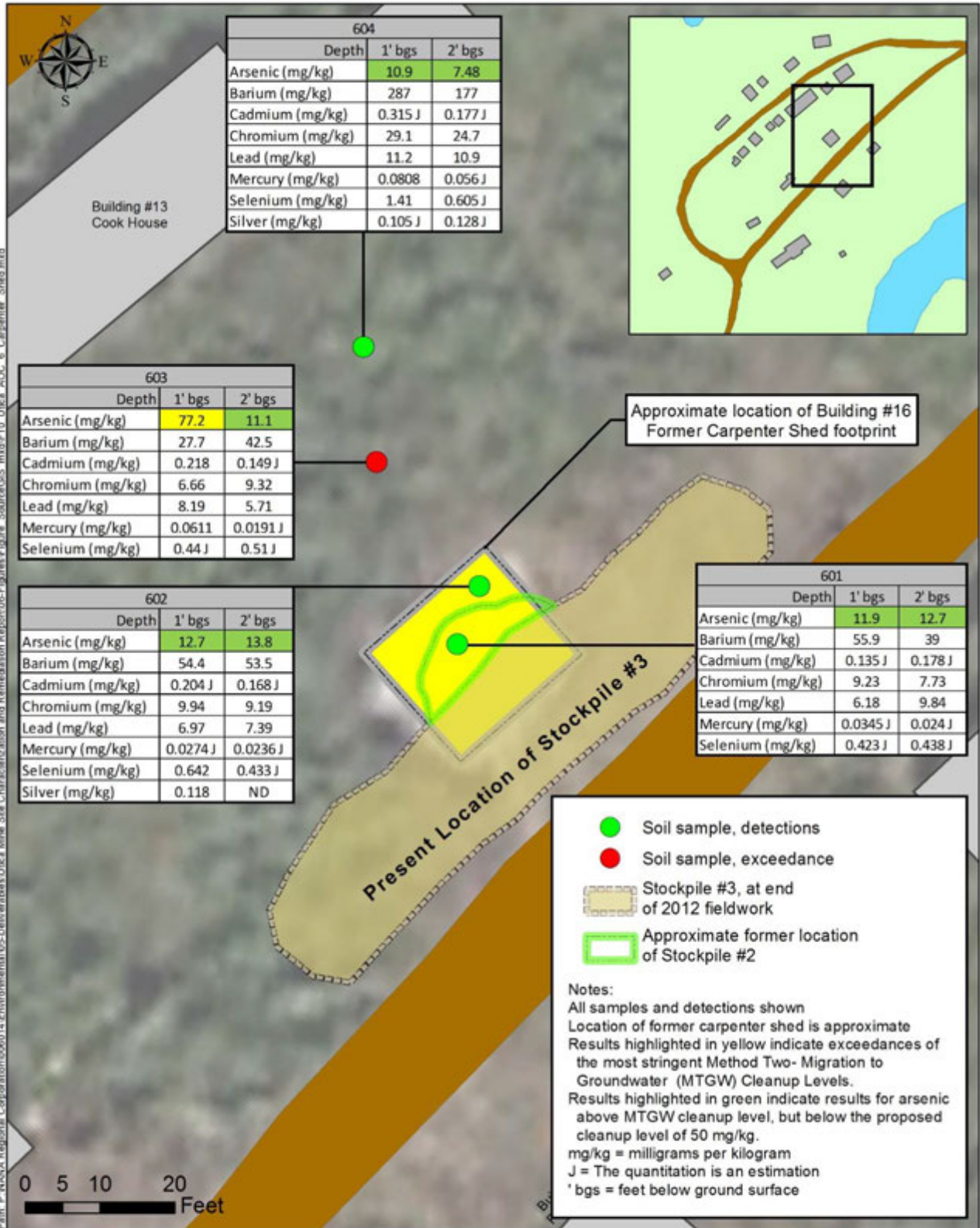
There were no deviations from the work plan at AOC 6.

Table 11 AOC 6 Utica Mine Camp Site Former Carpenter Shed Analytical Results

ANALYTE	Units	ADEC Cleanup Level	1209 UTI601-1	1209 UTI601-2	1209 UTI602-1	1209 UTI602-2	120 9UTI603-1	1209 UTI605-1 Duplicate of 1209 UTI603-1	RPD	1209 UTI603-2	1209 UTI604-1	1209 UTI604-2
Arsenic	mg/Kg	3.9	11.9	12.7	12.7	13.8	77.2	20.4	116	11.1	10.9	7.48
Barium	mg/Kg	1100	55.9	39	54.4	53.5	27.7	35.8	26	42.5	287	177
Cadmium	mg/Kg	5	0.135 J	0.178 J	0.204 J	0.168 J	0.218	0.21	4	0.149 J	0.315 J	0.177 J
Chromium	mg/Kg	25	9.23	7.73	9.94	9.19	6.66	6.52	2	9.32	29.1	24.7
Lead	mg/Kg	400	6.18	9.84	6.97	7.39	8.19	8.94	9	5.71	11.2	10.9
Mercury	mg/Kg	1.4	0.0345 J	0.024 J	0.0274 J	0.0236 J	0.0611	0.0296 J	69	0.0191 J	0.0808	0.056 J
Selenium	mg/Kg	3.4	0.423 J	0.438 J	0.642	0.433 J	0.44 J	0.479 J	8	0.51 J	1.41	0.605 J
Silver	mg/Kg	11.2	ND	ND	0.118	ND	ND	ND	NC	ND	0.105 J	0.128 J

Yellow shaded cells indicate the exceedance of ADEC clean up levels

RPDs are calculated between the primary and duplicate analyses presented in the preceding columns; QA failures are highlighted in green



Discussion

Samples collected at AOC 6 were found to be representative of the natural metals concentrations in the Utica Mine Site area (AOC 10, table 15). Arsenic was slightly higher than the ADEC most stringent cleanup level. However, arsenic levels hundreds of times higher have been found in nearby natural samples. It is difficult to determine the extent and influence of anthropogenic disturbance, undisturbed, and natural disturbance (from erosion and other hydrologic activity) on the natural soils at the Utica Mine Site because of the long history and many types of mining that have taken place in the area. All of these disturbance mechanisms breakdown surface material and concentrate or dilute minerals and metals. However, as noted in the site history section earlier in this report, we believe the Utica Mine Camp Site (including AOC 6) is primarily composed of dredge tailings that were leveled for building the camp.

Remaining Work

The sample results did not confirm the TPECI findings. We propose that they did provide a comparison with the background samples of AOC 10 and that no non-background contaminants are present. No further action is proposed for AOC 6.

AOC 7- Inmachuck River Bank and Down-Slope Sampling

The area between the main road through the site and the river has a natural gentle slope, similar to the rest of the river valley. The area directly to the southeast of the camp buildings is a pad made from what appears to be repurposed dredge tailings. The natural grade is covered by low lying bushes, mosses, and lichens typical of the region. Some areas of bare ground are apparent where vegetation has failed to colonize former tailings and rocky areas. The Inmachuck riverbank is composed of sand and gravel.

Field Activities

On September 12, 2012 WHPacific advanced fifteen test pits by hand with shovels to 2 feet bgs. Archaeological monitoring was conducted at this site during excavation. Field screenings were conducted with a PID at two depths for each pit, generally at one and two feet bgs. Test Pit 07 was placed in the ephemeral watercourse of AOC 9, where the suspected Settling Pond outflow joins the Inmachuck River. Soil samples were collected for analysis of GRO, DRO, RRO, BTEX, and metal constituents from the depth at each pit which yielded the highest PID results (15 primary, 2 duplicates, 1 MS/MSD; table 5). The test pits were backfilled with the removed soil, and where applicable, any vegetative mat present was replaced at the surface to minimize impact. The test pit locations were recorded with a precision GPS unit for later mapping.

Laboratory Analyses Results

Table 12 shows a summary of the analytical sample results for AOC 7. Detectable concentrations are plotted on Figure 11. There were no concentrations of GRO, DRO, RRO, BTEX, or metals above ADEC established cleanup levels with the exception of arsenic. NRC is currently proposing an alternative cleanup level for this COC due to elevated background concentrations. ADEC tentatively approved a “to be considered background level” per email correspondence with NRC (Appendix F).

Discussion

The Inmachuck Riverbank samples were collected from locations characterized as [dredge?] tailings graded level and now overgrown with vegetation. The location is minimally impacted by industrial activity other than abandoned metal debris. The sample results indicate there were no measureable POL impacts to the area. The metals results were comparable to the background characterization performed at AOC 10.

Results of no detectable POL concentrations down gradient of the AOC 3 Machinist Shop and the AOC 1 Former Power House suggest there is no active pathway of POL contamination.

Deviations from the Work Plan

There were no deviations from the work plan.

Remaining Work

The sample results indicate the surface soils and sediment west of the riverbank do not harbor contaminants migrating into the Inmachuk River. No non-background contaminants are present. No further action is proposed for the AOC 7 Inmachuck Riverbank

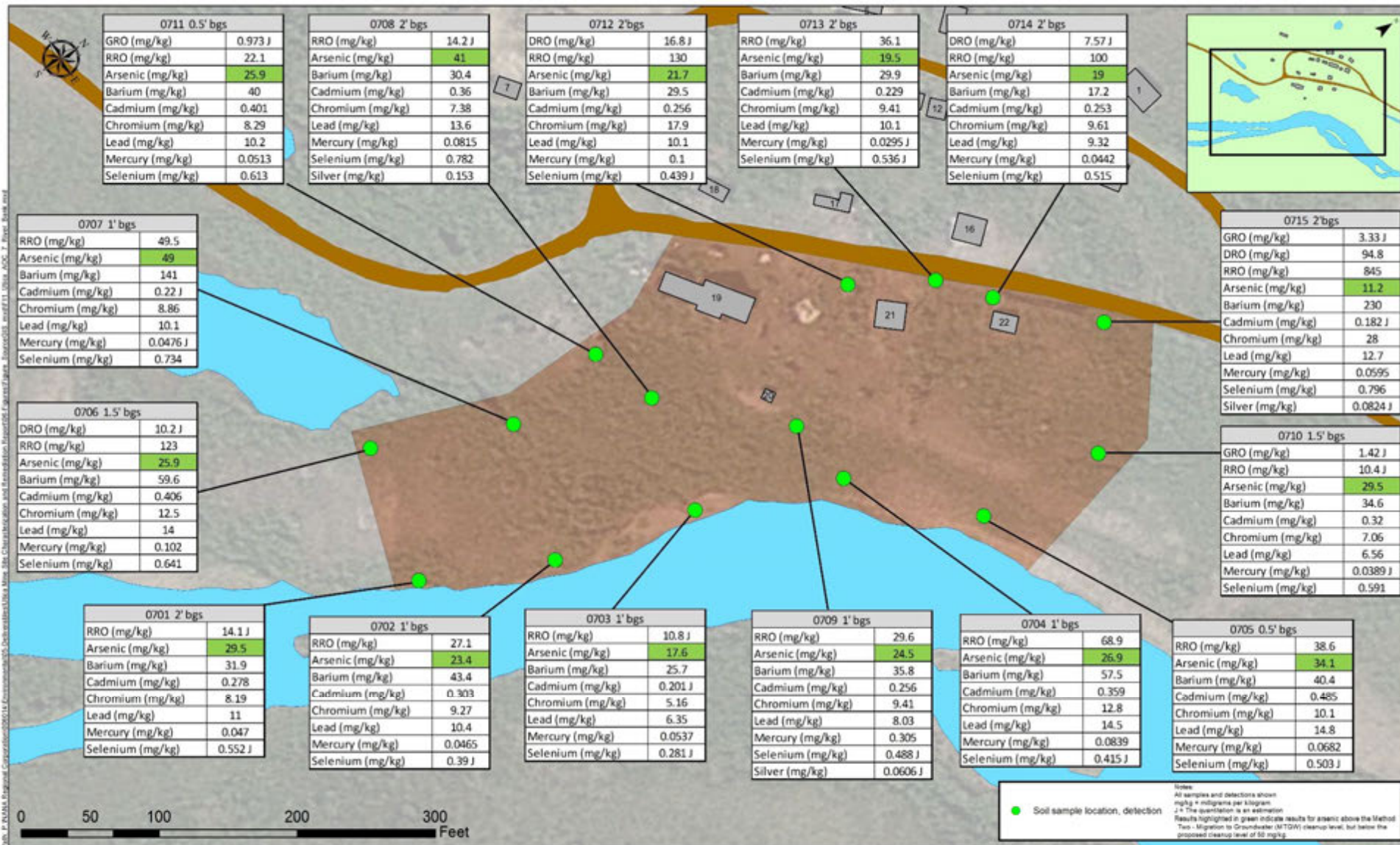
Table 12 AOC 7 Utica Mine Site Inmachuck Riverbank Analytical Results

ANALYTE	1209 UTI 0701	1209 UTI 0702	1209 UTI 0703	1209 UTI 0704	1209 UTI 0705	1209 UTI 0706	1209 UTI 0707	1209 UTI 0708	1209 UTI 0709	1209 UTI0716 Dup. of 0709	RPD
Gasoline Range Organics	ND	ND	ND	ND	ND	ND	ND	ND	ND	2.07 J	ND
Diesel Range Organics	ND	ND	ND	ND	ND	10.2 J	ND	ND	ND	ND	NC
Residual Range Organics	14.1 J	27.1	10.8 J	68.9	38.6	123	49.5	14.2 J	29.6	44.2	40
Benzene	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NC
Ethyl- benzene	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NC
o-Xylene	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NC
P & M - Xylene	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NC
Toluene	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NC
Arsenic	29.5	23.4	17.6	26.9	34.1	25.9	49	41	24.5	29.2	18
Barium	31.9	43.4	25.7	57.5	40.4	59.6	141	30.4	35.8	40.9	13
Cadmium	0.278	0.303	0.201 J	0.359	0.485	0.406	0.22 J	0.36	0.256	0.315	21
Chromium	8.19	9.27	5.16	12.8	10.1	12.5	8.86	7.38	9.41	10	6
Lead	11	10.4	6.35	14.5	14.8	14	10.1	13.6	8.03	12.3	42
Mercury	0.047	0.0465	0.0537	0.0839	0.0682	0.102	0.0476 J	0.0815	0.305	0.0679	127
Selenium	0.552 J	0.39 J	0.281 J	0.415 J	0.503 J	0.641	0.734	0.782	0.488 J	0.685	34
Silver	ND	ND	ND	ND	ND	ND	ND	0.153	0.0606 J	ND	NC

ANALYTE	1209 UTI0710	1209 UTI0711	1209 UTI0712	1209 UTI0713	1209 UTI0714	1209UTI0717 Duplicate of 1209UTI0714	RPD	1209 UTI0715
Gasoline Range Organics	1.42 J	0.973 J	ND	ND	ND	1.38 J	NC	3.33 J
Diesel Range Organics	ND	ND	16.8 J	ND	7.57 J	9.78 J	25	94.8
Residual Range Organics	10.4 J	22.1	130	36.1	100	109	9	845
Benzene	ND	ND	ND	ND	ND	0.00603 J	NC	ND
Ethylbenzene	ND	ND	ND	ND	ND	0.0188 J	NC	ND
o-Xylene	ND	ND	ND	ND	ND	ND	NC	ND
P & M - Xylene	ND	ND	ND	ND	ND	ND	NC	ND
Toluene	ND	ND	ND	ND	ND	ND	NC	ND
Arsenic	29.5	25.9	21.7	19.5	19	23.4	21	11.2
Barium	34.6	40	29.5	29.9	17.2	20.6	18	230
Cadmium	0.32	0.401	0.256	0.229	0.253	0.265	5	0.182 J
Chromium	7.06	8.29	17.9	9.41	9.61	7.51	25	28
Lead	6.56	10.2	10.1	10.1	9.32	9.38	1	12.7
Mercury	0.0389 J	0.0513	0.1	0.0295 J	0.0442	0.0425	4	0.0595
Selenium	0.591	0.613	0.439 J	0.536 J	0.515	0.505 J	2	0.796
Silver	ND	ND	ND	ND	ND	0.0427 J	NC	0.0824 J

Yellow shaded cells indicate the exceedance of ADEC clean up levels

RPDs are calculated between the primary and duplicate analyses presented in the preceding columns; QA failures are highlighted in green



AOC 8- Soil Stockpiles

The AOC 8 Soil Stockpiles were given the highest priority as WHPacific arrived at the Former Utica Mine Camp Site. Samples were collected and analyzed with a fast turnaround time to base the decision for materials to be land farmed or packaged and transported off site for disposal.

WHPacific noted several stockpiles on site during the first June site visit, and continued to use the stockpile numbers established by TPECI in Figure 2 of the 2010 Site Characterization Work Plan. The soil stockpiles were not covered when WHPacific arrived on site. Grasses and small bushes were growing out of most stockpiles. A thin plastic material used for bottom liners was disintegrating when found. It was apparent that the same liner bottom material had been used as stockpile covers. The material had been shredded by winds and scattered across the site. Approximately five contractor bags of plastic liner were recovered over the two weeks WHPacific was on site and disposed of in the local landfill at Deering.

The following provides a summary of the stockpiles present when WHPacific arrived:

- Stockpile 1: Approximately 10 CY; located between the Former Power Shed and the Machinist Shop.
- Stockpile 2: Approximately 25 CY; formerly located on the building footprint of the Former Carpenter Shed (moved to the current location at the north end of stockpile 3 by WHPacific in the course of AOC 6 fieldwork).
- Stockpile 3: Approximately 300 CY; partially covering the Former Carpenter Shed footprint to the northwest of the main road through the site.
- Stockpiles 4 and 5: Approximately 40 CY total. While TPECI describes these as two separate features, WHPacific found them as one continuous mass of what appears to have possibly been 4 semi-distinct stockpiles before erosion or some other unknown process conjoined them. WHPacific will consider them to be one mass of soil for sampling and treatment purposes, but continue to use the descriptor "Stockpiles 4 and 5" to preserve continuity.
- Stockpile 6: Approximately 5 CY; located between Stockpile 1 and the Machinist Shop.

Stockpile 7 was created as a result of the AOC 1 excavation performed by WHPacific.

Field Work

On September 9, 2012 WHPacific used hand shovels to collect samples approximately one foot into several locations on each stockpile. Field screenings using a PID were conducted, and a total of 23 analytical samples, including one MS/MSD and one duplicate sample were collected. The location of each sample was recorded using a precision GPS unit.

Laboratory Analyses Results

Table 13 summarizes analytical sample results for AOC 8. DRO concentrations above the ADEC migration to ground water cleanup level of 250 mg/kg were detected in every stockpile except 4 and 5. GRO and RRO were not detected above the ADEC cleanup level of 300 and 11,000 mg/kg, respectively. Trace amount of BTEX constituents were found in Stockpiles 2, 4, 5, and 6. Metals were found in concentrations below ADEC cleanup levels in all stockpiles, except Stockpiles 4, 5, and 6 where mercury was found at 1.43, 1.75, and 2.97 mg/kg respectively. The ADEC method two migration to ground water cleanup level for mercury is 1.4 mg/kg.

One sample from Stockpiles 5 yielded an arsenic concentration of 373 mg/kg, exceeding the proposed site specific cleanup level of 50 mg/kg for this constituent. NRC is currently proposing an alternative cleanup level for this COC due to elevated background concentrations. ADEC tentatively approved a “to be considered background level” per email correspondence with NRC (Appendix F).

Table 13 AOC 8 Utica Mine Site Stockpile Analytical Results

Location	Sample Number	As	Ba	Cd	Cr	Pb	Hg	Se	Ag
Stockpile 1	1209UTI00801	18.2	30.3	0.351	6.79	18.8	0.16	0.457J	0.0567J
	1209UTI00802	26.5	84.7	0.459	8.93	14.3	0.0999	0.779	0.0477J
	1209UTI00803	34.4	59.7	0.365	9.67	16.3	0.0623	0.642	0.0547J
	1209UTI00804	14.3	44.3	0.200J	10.9	7.05	0.0258J	0.414J	0.0474J
Stockpile 2	1209UTI00805	40.6	44.1	0.41	8.46	203	0.258	0.463J	0.171
	1209UTI00806	19.3	42.7	0.365	8.26	243	0.345	0.487J	0.0326J
	1209UTI00807	22.6	72.7	0.682	9.9	144	0.0981	0.516	0.0768
	1209UTI00808	15.9	20.5	0.346	7.59	12.8	0.0535	0.366J	0.0399J
Stockpile 3	1209UTI00809	20.8	41.4	0.396	8.02	28.4	0.224	0.557	0.0650U
	1209UTI00810	25.7	39.5	0.386	9.52	19.7	0.0809	0.404J	0.0587J
	1209UTI00811	21.1	44.9	0.408	11.4	20.3	0.171	0.420J	0.0400J
	1209UTI00812	29.9	26.8	0.337	7.41	25.6	0.146	0.517	0.0871J
	1209UTI00813	22.9	35	0.31	8.02	46.8	0.095	0.541	0.0777J
	1209UTI00823	43	23.7	0.269	5.18	12.6	0.0544	0.367J	0.0624U
Stockpile 4	1209UTI00814	16.3	34.2	0.333	7.17	15.3	1.43	0.339J	0.0318J
	1209UTI00815	25.7	38.9	0.392	7.79	19.5	0.0736	0.509	0.0474J
	1209UTI00816	24.9	36	0.362	8.84	22.7	0.0601	0.475J	0.0458J
Stockpile 5	1209UTI00817	16.4	36.4	0.261	7.04	26.9	0.071	0.370J	0.0354J
	1209UTI00818	373	40.9	0.375	8.89	16.4	0.0712	0.594	0.0490J
	1209UTI00819	14.1	28	0.203J	6.04	12.4	1.75	0.287J	0.0650U
Stockpile 6	1209UTI00820	18.4	24.2	0.367	10.5	17.2	2.97	0.276J	0.0666U
	1209UTI00821	21.7	29.8	0.419	14.1	18.9	0.129	0.442J	0.0403J
	1209UTI00822	24.7	20.9	0.301	5.77	9.79	0.0808	0.0894	0.0320J

Yellow shaded cells indicate the exceedance of ADEC clean up levels

Remediation Efforts

Stockpile 6 and its bottom liner were placed in six Super Sack™ brand 1 CY bags for transportation offsite to a facility licensed to receive materials contaminated with metals. Approximately half of the soils in Stockpiles 4 and 5 were placed into the last 14 Super Sacks™. Additional remedial efforts were hampered by supplies and weather. The filled Super Sacks™ and the remaining stockpiles (including the remainders of Stockpiles 4 and 5) were covered with 6 mil reinforced polyethylene liner material, which was weighed down with large rocks and heavy metal debris to prevent wind from blowing the covers away.

Deviations from the Work Plan

Heavy equipment availability prohibited WHPacific from transporting any soils for disposal.

Discussion

The AOC 8 stockpiles are characterized, staged, and ready to be either transported for disposal or moved to a landfarm for remedial action. The AOC 4 South Dump Site is a potential location to build a landfarm as the site is accessible, clear of debris, obstructions and vegetation.

Remaining Work

The remainder of stockpiles 4 and 5 will need to be placed in Super Sacks for transport. Stockpiles 4, 5, and 6 packaged in Super Sacks will then need to be transported as metals (arsenic and mercury) contaminated soil to a facility out of state. Stockpiles 1, 2, and 3 require land farming to remediate the DRO concentrations.

AOC 9- Possible Settling Pond

WHPacific noted the light blue color of the suspected settling pond discussed in the SLR ESA (SLR, 2007) during the June 2012 site visit. When WHPacific returned in September, the water level was higher and the pond showed coloration more typical of the other ponds in the area.

Field Work

On September 9, 2012 WHPacific advanced four test pits by hand in the soils surrounding the pond to a depth of one foot bgs where water saturation began. Archaeological monitoring was conducted at this site during excavation. Samples were field screened by PID. An analytical sample was collected at one foot bgs in each of the test pits (4 primary; table 5), and the pits were backfilled using the removed soils. A field duplicate and MS/MSD pair were not included.

WHPacific deployed two small inflatable rafts to collect water and sediment samples from the pond surface and bottom respectively. Field parameters and water samples were collected from just below the surface of the water at four different locations in the pond. A spring loaded Ekman dredge was deployed from the rafts at each sampling location to collect bottom sediment samples. However, the copious pond flora fouled the dredge jaws, keeping the jaws from completely closing and allowing sediments to drain from the dredge as it was being pulled to the surface. Sediment samples were collected from the shallower west end of the pond where WHPacific field scientists could wade and collect samples by hand shovel. A field duplicate and MS/MSD were not included.

Laboratory Analyses Results

Sample results are summarized in Table 14 and plotted on Figure 11. There were no detectable concentrations of POL products, VOC or PAH constituents in the sediments and water of the AOC 9 pond. Metal concentrations were below the ADEC cleanup levels for soils, except arsenic. Arsenic concentrations of the shore sediment and pond bottoms were above the ADEC soil action limit of 3.9 mg/kg. Arsenic levels were comparable to the natural level found from the AOC 10 background studies. DRO, arsenic and barium were the only COPC detected in the pond water at levels above the Table C ground water criteria.

Table 14 AOC 9 Possible Settling Pond Analytical Results

SHORE AND POND BOTTOM

ANALYTE	1209UTIP00901S D	1209UTIP00902S D	1209UTIP00903S D	1209UTIP00904S D	1209UTIP0B0901S D	1209UTIP0B0902S D
Gasoline Range Organics	ND	ND	ND	ND	1.47 J	ND
Diesel Range Organics	12 J	9.85 J	ND	ND	42.2 J	ND
Residual Range Organics	131	123	23.7	97.5	441	337
Benzene	ND	ND	ND	ND	ND	ND
Ethylbenzene	ND	ND	ND	ND	ND	ND
o-Xylene	ND	ND	ND	ND	ND	ND
P & M -Xylene	ND	ND	ND	ND	ND	ND
Toluene	ND	ND	ND	ND	ND	ND
1-Methylnaphthalene	ND	ND	ND	ND	ND	ND
2-Methylnaphthalene	ND	ND	ND	ND	ND	ND
Acenaphthene	ND	ND	ND	ND	ND	ND
Acenaphthylene	ND	ND	ND	ND	ND	ND
Anthracene	ND	0.00371 J	ND	ND	ND	ND
Benzo(a)Anthracene	ND	0.017	ND	ND	ND	ND
Benzo[a]pyrene	ND	0.0143	ND	ND	ND	ND
Benzo[b]Fluoranthene	ND	0.0176	ND	ND	ND	ND
Benzo[g,h,i]perylene	ND	0.00746	ND	ND	ND	ND
Benzo[k]fluoranthene	ND	ND	ND	ND	ND	ND
Chrysene	ND	0.0154	ND	ND	ND	ND

ANALYTE	1209UTIP00901S D	1209UTIP00902S D	1209UTIP00903S D	1209UTIP00904S D	1209UTIP0B0901S D	1209UTIP0B0902S D
Dibenzo[a,h]anthracene	ND	ND	ND	ND	ND	ND
Fluoranthene	0.00255 J	0.0309	ND	ND	ND	ND
Fluorene	ND	ND	ND	ND	ND	ND
Indeno[1,2,3-c,d]pyrene	ND	0.00663 J	ND	ND	ND	ND
Naphthalene	ND	ND	ND	ND	ND	ND
Phenanthrene	ND	0.0134	ND	ND	ND	ND
Pyrene	ND	0.0388	ND	ND	ND	ND
Arsenic	27.1	25.6	28	30.8	38.2	95.3
Barium	57.3	49.4	28.8	49.9	61	79.6
Cadmium	0.393	0.373	0.303	0.433	0.489	0.564
Chromium	12.5	9.73	5	11.8	11.6	12.8
Lead	18.7	12.8	18	17.8	16.6	19.4
Mercury	0.0704	0.0532 J	0.0198 J	0.0588	0.0718	0.0863 J
Selenium	0.756	0.624 J	0.658	0.418 J	0.716 J	0.482 J
Silver	0.0614 J	0.0491 J	0.0579 J	0.0617 J	0.0741 J	0.095 J

Yellow shaded cells indicate the exceedance of ADEC clean up level

SURFACE WATER

ANALYTE	1209UTIP00901S W	1209UTIP00902S W	1209UTIP00903S W	1209UTIP00904S W	1209UTIRI0901S W	1209UTIRI0902S W
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Gasoline Range Organics	ND	ND	ND	ND		
Diesel Range Organics	0.185 J	0.18 J	0.183 J	0.198 J		
Residual Range Organics	ND	ND	ND	ND		
Benzene	ND	ND	ND	ND		
Ethylbenzene	ND	ND	ND	ND		
Toluene	ND	ND	ND	ND		
o-Xylene	ND	ND	ND	ND		
P & M -Xylene	ND	ND	ND	ND		

1-Methylnaphthalene	ND	ND	ND	ND		
2-Methylnaphthalene	ND	ND	ND	ND		
Acenaphthene	ND	ND	ND	ND		
Acenaphthylene	ND	ND	ND	ND		
Anthracene	ND	ND	ND	ND		
Benzo(a)Anthracene	ND	ND	ND	ND		
Benzo[a]pyrene	ND	ND	ND	ND		
Benzo[b]Fluoranthene	ND	ND	ND	ND		
Benzo[g,h,i]perylene	ND	ND	ND	ND		
Benzo[k]fluoranthene	ND	ND	ND	ND		
Chrysene	ND	ND	ND	ND		

ANALYTE	1209UTIP00901S W	1209UTIP00902S W	1209UTIP00903S W	1209UTIP00904S W	1209UTIRI0901S W	1209UTIRI0902S W
Dibenzo[a,h]anthracene	ND	ND	ND	ND		
Fluoranthene	ND	ND	ND	ND		
Fluorene	ND	ND	ND	ND		
Indeno[1,2,3-c,d]pyrene	ND	ND	ND	ND		
Naphthalene	ND	ND	ND	ND		
Phenanthrene	ND	ND	ND	ND		
Pyrene	ND	ND	ND	ND		

Arsenic	6.07	4.74 J	4.25 J	4.02 J	ND	ND
Barium	50.3	45.5	39.9	41.6	16.2	16.6
Cadmium	ND	ND	ND	ND	ND	ND
Chromium	ND	ND	ND	ND	ND	ND
Lead	ND	ND	ND	ND	ND	ND
Mercury	ND	ND	ND	ND	ND	ND
Selenium	ND	ND	ND	ND	ND	ND
Silver	ND	ND	ND	ND	ND	ND

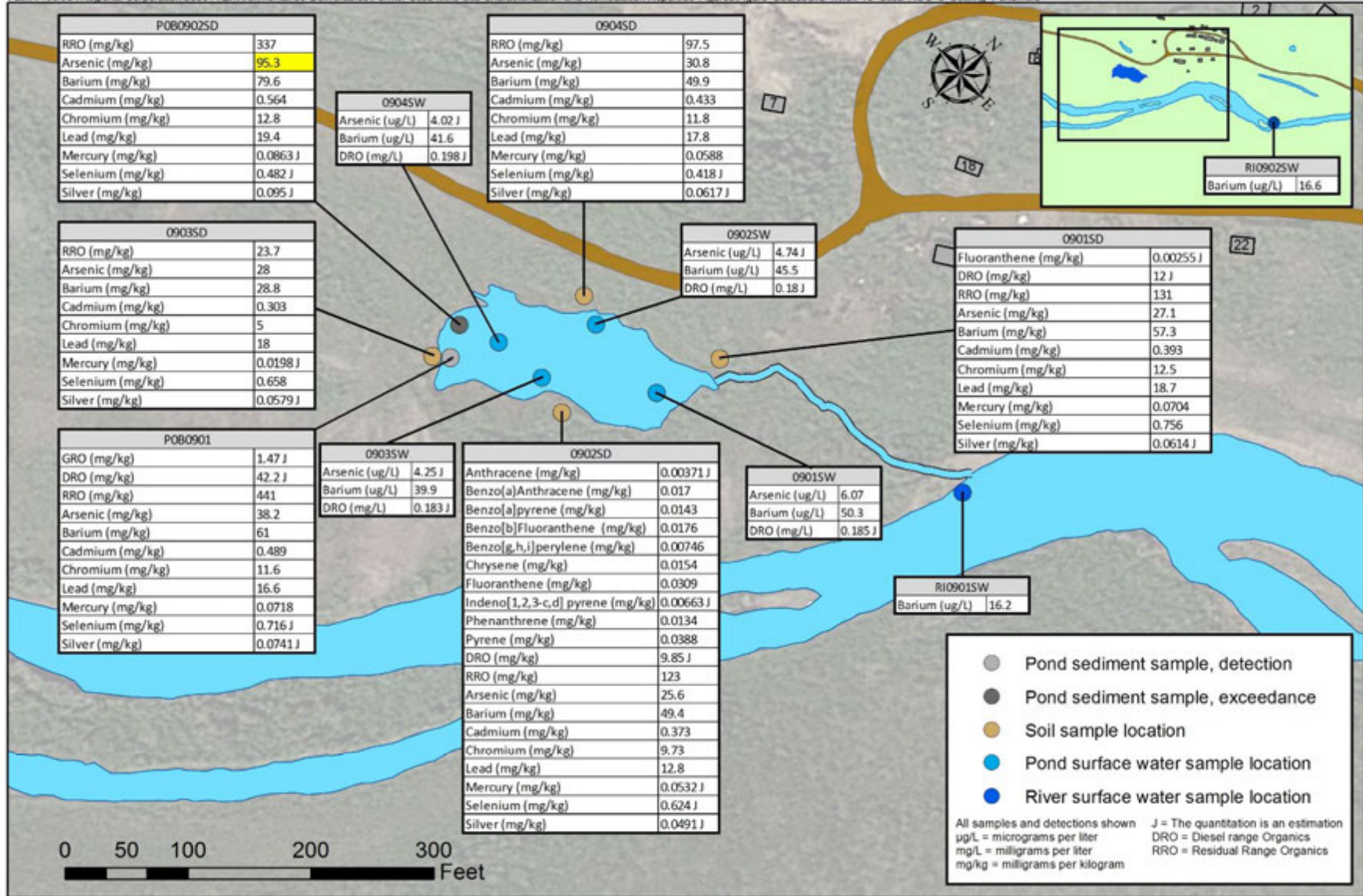


Figure 13
Settling Pond
AOC 9

Settling Pond (AOC 9) Samples
2012 Former Utica Mine
Characterization and Remediation Report
November, 2012



Deviation from Work Plan

There were two deviations from the work plan at AOC 9; one was the omission of collecting field duplicate and MS/MSD samples. Field screening was also omitted due to field oversight. However, all samples from the pond were submitted to the lab; field screening was not driving their collection locations.

Discussion

The analytical results indicate the settling pond is comparable to the surrounding conditions of the site. POL contamination in shore sediment and the water column was not present. Metals analyses of the near shore sediment and water column were consistent with concentrations found at the rest of the site.

Remaining Work

The analytical results have provided a characterization of the potential settling pond as being below the state regulatory limits. No further action is proposed for the AOC 9.

AOC 10 Background Metals

Levels of arsenic above the ADEC cleanup level of 3.9 mg/kg, designated for sites receiving less than 40 inches of precipitation per year, were detected throughout the site during previous investigations, prompting WHPacific to believe that significantly higher concentrations of non-anthropogenic sources of arsenic may naturally exist at the site.

Field Work

The AOC 10 – Background Metals sampling work plan was separately approved by ADEC on June 28, 2012. On the second site reconnaissance eight test pits were advanced by hand at undisturbed areas uphill from the mining site, on July 12th. The selected sample collection areas had a similar geology and elevation to the mining site. Archaeological monitoring was conducted at this AOC during excavation. Nine samples were submitted for analysis (table 5).

Laboratory Analyses Results

The results from these samples show arsenic levels ranging from 5.86 to 17.1 mg/kg, demonstrating naturally elevated arsenic levels in the local soils. Locations and a summary of metals detections are presented in Table 15 and Figure 12.

Discussion

Further research into the geology of the Former Utica Mine Camp Site and general area has led to the following description and history.

Geologic Setting

The bulk of the bedrock in the region is mapped by the USGS (Till and others, 2010) as unit DOx, the “mixed unit” of the Nome Complex. These rocks are interlayered carbonaceous schist, biotite schist and marble units which have undergone greenschist facies metamorphism during the Mesozoic. In the Inmachuk River area, these rocks are overlain in places by younger basalt flows (QTV) which flowed north from the Umuruk Lake volcanic center between 2 and 5 million years ago.

Most of the Inmachuk River valley was placer mined intermittently from near Deering, south to the confluence of Hannum Creek. Placer tailings and pond remnants occur throughout the valley. Fluvial

benches were also mined up to 20-30 feet above stream level and beneath the capping basaltic volcanics.

Geochemistry of Bedrock

The source of the placer gold in the Fairhaven District appears to have come mainly from eroded quartz-arsenopyrite-gold veins within the carbonaceous schists of unit DOx. This unit is exposed throughout the headwaters of the Inmachuk and Kugruk Rivers. Gold and arsenic are liberated during the weathering and transport of the bedrock. Soil and rock sampling (>3000 samples) in this unit indicates that mean background values are expected to be roughly 25 ppm As in unmineralized bedrock and in areas of naturally occurring mineralization values are expected to be >150-2000 ppm As.

In addition, there are several zones in the headwaters of the Inmachuk River where highly elevated Pb, Zn and Ag occur in the soil and water. These zones trend northwest, across the Harry and Hannum Creek areas. Similar zones occur throughout the Kugruk River valley and some have been explored by core drilling.

NRC is proposing an alternative site specific soil cleanup level based on background arsenic that has no anthropogenic source. ADEC tentatively approved a “to be considered background level” per email correspondence with NRC (Appendix F). ADEC has not yet defined nor approved of the site-specific cleanup/background level proposed (40-50 mg/kg).

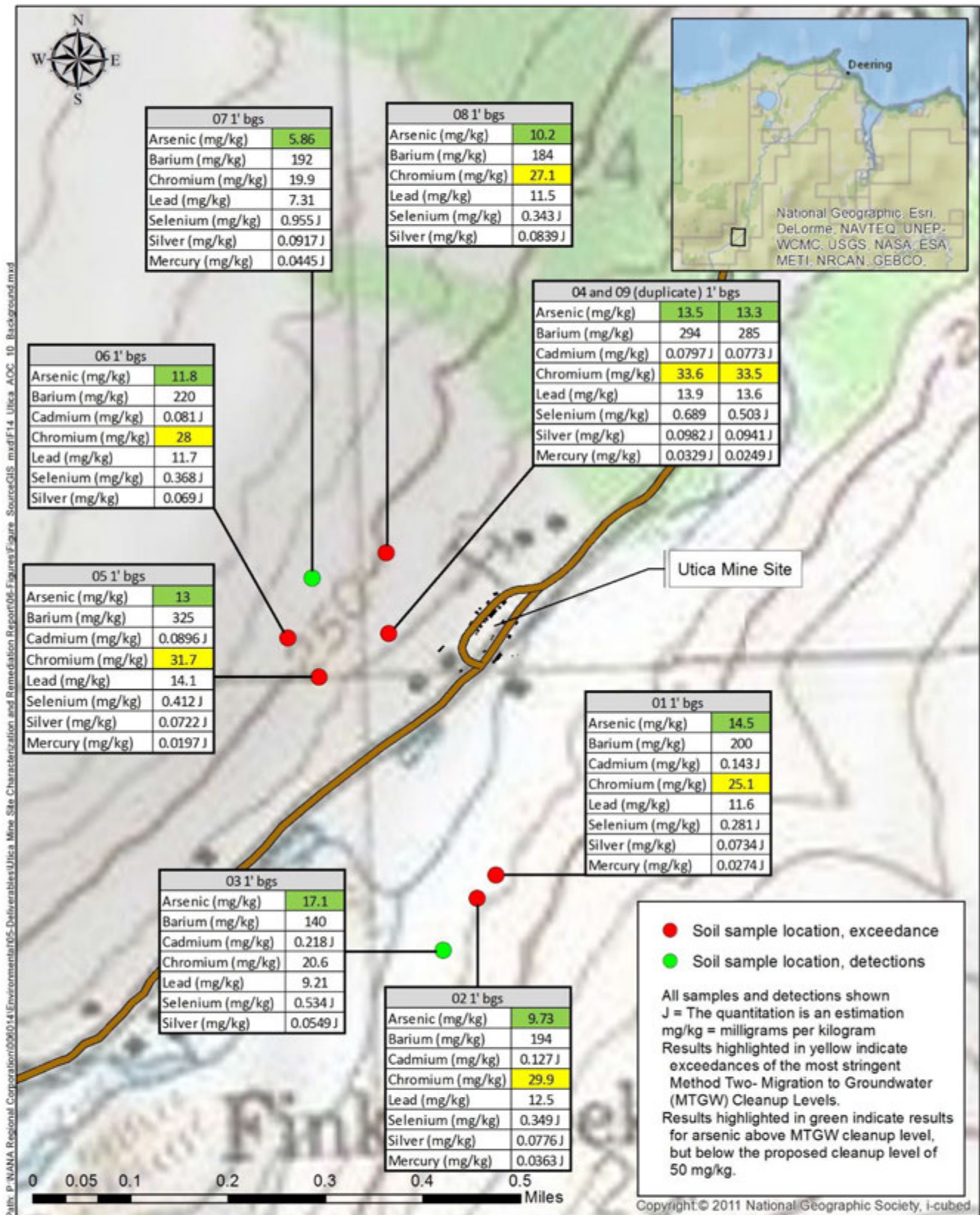
Deviation from Work Plan

The WHPacific field crew noted the sample collection locations stated in the work plan were in a heavy equipment and motor vehicle laydown yard. To avoid potential contamination the WHPacific field crew stepped out and away from the obvious signs of disturbance.

Table 15 AOC 10 Background Analytical Results

ANALYTE	Units	ADEC Cleanup level	0712 UTI01	071 UTI02	0712 UTI03	0712 UTI04	0712 UTI05	0712 UTI06	0712 UTI07	0712 UTI08	0712 UTI09
Arsenic	mg/Kg	3.9	14.5	9.73	17.1	13.5	13	11.8	5.86	10.2	13.3
Barium	mg/Kg	1100	200	194	140	294	325	220	192	184	285
Cadmium	mg/Kg	5	0.143 J	0.127 J	0.218 J	0.0797 J	0.0896 J	0.081 J	ND	ND	0.0773 J
Chromium	mg/Kg	25	25.1	29.9	20.6	33.6	31.7	28	19.9	27.1	33.5
Lead	mg/Kg	400	11.6	12.5	9.21	13.9	14.1	11.7	7.31	11.5	13.6
Selenium	mg/Kg	3.4	0.281 J	0.349 J	0.534 J	0.689	0.412 J	0.368 J	0.955 J	0.343 J	0.503 J
Silver	mg/Kg	11.2	0.0734 J	0.0776 J	0.0549 J	0.0982 J	0.0722 J	0.069 J	0.0917 J	0.0839 J	0.0941 J
Mercury	mg/kg *	1.4	0.0274 J	0.0363 J	ND	0.0329 J	0.0197 J	ND	0.0445 J	ND	0.0249 J

Yellow shaded cells indicate the exceedance of ADEC clean up levels



Conclusions and Recommendations

The completion of this work leaves the site well characterized. The remaining work described for each AOC above generally falls into three categories of action: no further action proposed, establish cleanup levels, and establish cleanup methods. The recommended next steps for this project are to write a comprehensive letter for each of these categories and submit them to DEC for concurrence. Each letter should include the historic sample locations and results and supporting discussion of why the action is proposed for each AOC.

In the interim and until further remediation action is taken at the site, an annual site visit and public meeting should be conducted (in Deering) and road repairs need to be implemented. After the road is repaired and the course of action is agreed upon, the reclamation can be implemented and the site can move into a reuse phase.

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Appendix A

Archeology Submittal

Appendix B

Photo Log

Appendix C

Laboratory Reports

Appendix D

Field Log

Appendix E

Bevill Amendment

Appendix F

Correspondence