Chilkoot Lumber Company:
PCB Remedial Action Closure Report

Prepared for:

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1.0 Introduction

This PCB Remedial Action Closure Report provides the information requested to satisfy EPA and ADEC requirements for closure of the Chilkoot Lumber Company site for PCB concerns. The document is organized chronologically and is intended to address all requirements required by EPA.

The remedial action began in June 2008 when Chilkat Environmental submitted an inventory of PCB equipment to EPA during an effort to dismantle the mill site and recycle the metal. During the summer of 2008 all transformers and PCB oil was removed from the site and shipped to Waste Management Inc. for proper disposal.

Following the removal action in 2008 the contractor requested an extension on October 16, 2008 for completion of this report by July 30, 2009 due to the extended timeframe needed to receive the required certificates of disposal. During the summer of 2009 Chilkat Environmental conducted verification sampling as required by EPA to confirm that the remedial action for PCB's was complete.

2.0 Project Background

The Chilkoot Lumber Company operated many transformers until 1991 when the mill, hog fuel powerhouse and generator that once powered the town of Haines were closed. The mill historically generated enough power for Haines and as a result presented many more transformers then comparable mill sites. A total of 34 unused transformers were at the site for the transformer investigation in June of 2008. Many were in their original positions while some had been centralized during prior dismantling efforts. Prior to handling of transformers Chilkat Environmental contacted EPA and reviewed regulatory letters provided to the owner suggesting methods to reach compliance.

EPA sent a letter dated November 2, 2000 to provide Notice of Non-Compliance pursuant to a 1999 EPA site visit. Violations documented by Montel Livingston, Region 10 Solid Waste and Toxics Unit, in the letter include; lack of proper labeling, absence of records and monitoring, improper storage, need for waste generator ID number, leaking transformers (clean-up required within 48 hours), lack of notification for handling and PCB transformers not registered with the fire department. (*Attachment A*)

The owner submitted the July 2000 Access Consulting Group's Haines Sawmill Clean-up Plan to the EPA. In response, Montel Livingston responded with a letter February 23, 2001. This letter allowed the owner until June 29, 2001 to remove all PCB waste and transformers from the site. (*Attachment B*)

On August 21 of 2007 the EPA conducted another site visit and requested information from the owner pursuant to the items for completion by June 29, 2001 listed in the

abovementioned letter. On February 15, 2008 the EPA sent another letter requesting actions by the owner. (*Attachment C*)

Upon commencement of the 2008 clean-up Chilkat Environmental contacted EPA to discuss methods to reach compliance. Scott E. Downey, Manager of Region 10 Pesticides and Toxics Unit responded with a draft letter dated 6.26.08 and a final letter dated 7.08.08. *(Attachment D)* Another letter was received from EPA confirming extension of deadline to July 2009 to remove all PCB waste and transformers from the site and reach compliance. Selected text from EPA requirements is included below as Exhibit 1.

Exhibit 1: Excerpts from 7.08.08 EPA letter

1. *The complete characterization of the Chilkoot Lumber Company Site located in Haines, Alaska in accordance with 40 CFR Part 761, Subpart N: Site Characterization Sampling for PCB remediation Waste under 40 CFR § 761.61(a)(2).*
   Section 8.0 Verification sampling

2. *The removal of all PCB waste from the Chilkoot Lumber Company Site located in Haines, Alaska to 25ppm PCBs or to a more stringent concentration of PCBs as require by the Alaska Department of Environmental Conservation (ADEC). This is too include all areas where PCB articles, PCB contaminated electrical equipment, PCB hydraulic equipment, PCB used oil, as well as PCB transformers have been stored at the Chilkoot Lumber Company Site in Haines, Alaska.*
   Section 6.0 Management of Transformers

3. *The removal of all PCB waste to less than 25 ppm PCBs in accordance with 40 CFR § 761.61(a)(4)(i)(B)(1) or to a more stringent PCB concentration as required by ADEC.*
   Section 6.0 Management of Transformers

4. *The sampling of the PCB contaminated electrical equipment, hydraulic equipment, equipment containing used oil, transformers, as well as waste from the Chilkoot Lumber Company located in Haines, Alaska prior to storage under 40 CFR § 761.65(c)(9). Sampling of PCB contaminated electrical equipment, transformers, as well as waste in accordance with 40 CFR §§ 761.61(a)(6)(i)-(ii).*
   Section 4.0 PCB Analyses of Dielectric Oil in Electrical Equipment

5. *The disposal of used oil containing PCBs $\geq$ 2 ppm and $\leq$ 49 ppm in accordance with 40 CFR§ 761.20(e). The submission of required documentation for this used oil to EPA.*
   Section 4.0 PCB Analyses of Used Oil for Disposal

6. *The disposal/incineration of all PCB remediation waste, from the Chilkoot Lumber Company located in Haines, Alaska, with a PCB concentration of < 50 ppm in accordance with 40 CFR § 761.61(a)(2)(i) and 40 CFR § 761.61(a)(5)(v)(A), in a state regulated municipal waste landfill, a RCRA Subtitle C landfill, a non-hazardous non-municipal waste landfill subject to the requirements of 40 CFR § 257.5 through 257.30, or in a chemical waste landfill or at an incinerator approved by the EPA to accept PCB waste subject to the Toxic Substances Control Act (TSCA).*
   Section 7.0 Certificates of Disposal

7. *The disposal/incineration of all PCB remediation waste, from the Chilkoot Lumber Company Site located in Haines, Alaska, with a PCB concentration of ≥ 50 ppm in accordance with 40 CFR § 761.61(a)(2)(ii), in a state regulated hazardous waste landfill permitted by EPA under section 3004 of RCRA, or permitted by a state under section 3006 of RCRA, or in a chemical waste landfill or at an incinerator approved by the EPA to accept PCB waste subject to the Toxic Substances Control Act (TSCA).*
   Section 7.0 Certificates of Disposal

8. *The disposal/incineration of all PCB bulk product waste from the Chilkoot Lumber Company Site located in Haines, Alaska in accordance with 40 CFR §§ 761.62(a)(1) - (7).*
   Section 7.0 Certificates of Disposal

9. *The disposal of PCB hydraulic machines in accordance with 40 CFR § 761.60(b)(3).*
   Section 7.0 Certificates of Disposal

10. *The removal of PCB contaminated articles which is sent for scrap metal recovery ovens or smelter in accordance with 40 CFR § 761.72. Removal of PCB containing liquids in accordance with 40 CFR §§ 761.50(a)-(e).*
   Section 6.0 Management of Transformers

11. *Provide copies of Certificates of Disposal for the disposal of the PCB wastes.*
   Section 7.0 Certificates of Disposal

12. *Provide copies of Certificates of Destruction for the incineration of the PCB wastes.*
   Section 7.0 Certificates of Disposal

13. *The identification on all appropriate facility drawings from the Chilkoot Lumber Company Site located in Haines, Alaska of the existence of TSCA regulated PCB waste and contamination, if any, that is left in place at the Chilkoot Lumber Company Site located in Haines, Alaska. This identification should indicate the need for additional precautions during future modification, renovation, or demolition of the facility.*
   Section 9.0 Summary of Verification Sampling

14. *Perform the required PCB verification sampling in accordance with 40 CFR §§ 761.61(a)(6)(i)-(ii).*
   Section 8.0 Verification sampling

15. *Perform the required PCB verification sampling analysis using PCB Methods 3500B/3540C or Method 3500B/3550B and the chemical analyses by EPA Method 8082 in accordance with 40 CFR § 761.61(a)(5)(iv) and 40 CFR § 761.292 (Subpart O).*
   Section 8.0 Verification sampling

16. *Dispose of PCBs in high efficiency boilers as required in accordance with 40 CFR§ 761.50(d)(2) and 40 CFR§ 761.71.*
   Section 7.0 Certificates of Disposal

17. *Dispose of metal surfaces that have been in contact with PCBs(e.g. painted metal) through the use of thermal decontamination in accordance with 40 CFR §§ 761.50(b)(4)(ii) and 761.79(c)(6)(See 40 CFR§ 761.62(a)(6).*
    Section 6.0 Management of Transformers

18. *Retain the records required under 40 CFR §§ 761.125(e)(5)(i)-(iv) and 40 CFR §§ 761.61(a)(3) - (a)(5).*
    Section 2.0 Project Background

19. *Store PCB remediation waste if required, at the clean-up site or site of generation for up to 180 days in accordance with 40 CFR §§ 761.65(c)(9)(i-iii). Store the PCB contaminated electrical equipment, PCB containing hydraulic equipment, and transformers for disposal in accordance with 40 CFR § 761.65 and 40 CFR § 761.50(c).*
    Section 6.0 Management of Transformers

20. *Remove the PCB remediation waste from all temporary storage areas have been in storage under 40 CFR §§ 761.65(c)(9)(i)-(iii).*
    Section 6.0 Management of Transformers

21. *Prepare and provide a copy of storage records as required by 40 CFR § 761.180.*
    Section 2.0 Project Background

22. *Chilkoot Lumber Company and Chilkat Environmental LLC, will provide to EPA Region 10 and ADEC a final report documenting the completion of the above items. This report will be provided no later October 15, 2008, for the removal of all PCB articles, PCB contaminated electrical equipment, PCB containing hydraulic equipment, PCB Transformers, all PCB used oil (≥ 2ppm and ≤ 49 ppm PCBs), as well as completion of PCB remediation. This report will also include:*

    a. *The results of the removal of all PCBs to less than 25 ppm PCBs or to a more stringent level of PCBs are required by the ADEC under the AAC.*

    b. *The results of the testing and QA/QC data for all PCBs at the Chilkoot Lumber Company Site located in Haines, Alaska.*

    c. *Information on additional pre- and post-cleanup sampling as well as the estimated cost of the cleanup by man-hours and dollars in accordance with 40 CFR §§ 761.61(a)(6)(i)-(ii) and 40 CFR § 761.61(a)(9) and 40 CFR §§ 761.125(c)(5)(i-ix). Although not required for compliance with the PCB Spill Cleanup Policy at 40 CFR § 761.125 (c)(5), this information should also be maintained by the Alaska Department of Environmental Conservation (ADEC) and Chilkat Environmental LLC.*

Prior to handling of transformers Chilkat Environmental coordinated with the owner to receive his TSCA identification number (AKW000202895) *(Attachment E*) as requested in the February 15, 2008 letter from the EPA. Also pursuant to this letter, PCB transformers were registered with the EPA on July 18, 2008. Registration includes 3 transformers and 3 capacitors > 500 ppm. *(Attachment F)* Registration was delayed by need for resampling of some transformers that did not have sufficient Quality Assurance / Quality Control (QA/QC) data for registration and regulatory compliance. Records have been maintained on the electrical equipment through disposal as required by *40 CFR §§ 761.125(e)(5)(i)-(iv) and 40 CFR §§ 761.61(a)(3) - (a)(5).* No storage records as required by *40 CFR § 761.180* had been maintained prior to June 2008.

3.0 PCB Equipment Inventory

In June of 2008 Chilkat Environmental and Larry Beck identified 34 transformers at the site. Each was documented and a photolog sent to EPA for discussion of management. Refer to Photos 1 through 8 below.

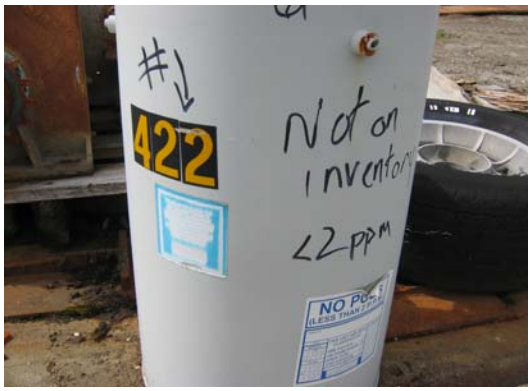


Photo 1: Transformer added to inventory #422

Photo 2: Transformers 526, 527, 528 on the Transformer Pad

Photo 3: Transformer 523, 524, 525 on Pad and 529 in tote formerly located in the chip blower

Photo 4: Transformer #725100 located near diesel shed

Photo 5: Transformers 511, 512, and 513 in Main Enclosure; four other transformers 507, 508, 509 and 510 are also located here

Photo 6: Two of the three transformers located on the office pad

Photo 7: Transformers 501, 502, 503, 504, 505, and 506 mounted on the Overhang

Photo 8: Connex Trailer containing Transformers 515, 516, 517, 518, 519, 520, 521, and 522 along with one tote full of soil and two 5 gallon bucks of oil from 529

4.0 PCB Analysis of Dielectric Oil in Electrical Equipment

In 1997, Alaska Department of Environmental Conservation (ADEC) Contaminated Site Manager, Anne Marie Palmieri helped facilitate sampling for PCB's in transformers at the site. The owner hired a qualified professional, Lance Pape PhD, to conduct the sampling. Analyses were performed by Jaco Analytical. (*Attachment G)* This data has been determined sufficient for regulatory decision-making by Project Manager, Mr. Duncan from EPA and the current ADEC Contaminated Site Manager, Bruce Wanstall.

Additional data was collected in 1999 but Chilkat Environmental was not able to locate QA/QC data from the laboratory. This information, showing four additional transformers, reported in the 2000 Access Consulting Phase 1 Site Assessment, presented three transformers as <10 ppm. These results did not provide sufficient data resolution for management. All four transformers were re-sampled by Chilkat Environmental using SW846 Method 8082. Sampling of PCB contaminated electrical equipment, transformers, as well as waste conducted by Chilkat Environmental was conducted in accordance with *40 CFR §§ 761.61(a)(6)(i)-(ii).* Information on transformer sampling is included as Table 1.

The four transformers noted as not having QA/QC data were re-sampled by Chilkat Environmental. Samples were received by Test America July 9, 2008. Results for the three transformers previously documented as <10 ppm were all Non-Detect. The result for transformer 7525100 was 581 ppm compared to the previously reported concentration of 510 ppm. *(Attachment H)*

Additional sampling was completed to characterize 4 capacitors and 6 insulators discovered during the project that were not documented in the June 2008 inventory. Three identical capacitors were found to contain pure PCB. *(Attachment I)* These were overpacked with the fourth capacitor. (*Photo 9 and 10*) The fourth capacitor was found to contain mostly water. Analyses were performed on the fourth capacitor by SW 846 Method 8082 and did not meet QA/QC requirements because of temperature outside limits and sample media as mostly water and not free product. (*Attachment J*) Further testing of the media as water instead of oil using Method 8082 was considered, however management of the four capacitors as >500 ppm was determined sufficient for regulatory management and disposal.

One of six fluid filled insulators *(Photo 11)* was sampled using SW846 Method 8082 for a result of 70.7 ppm. (*Attachment J*) Name plates on the insulators read; General Electric, labeled Cat. 3b 681 G4. Type 1: Class A69. Instruction Manual GEH-440. The fluid filled insulators were removed from Transformers 501, 502 and 503.

Transformer	PCB in ppm	Manufacturer	S/N
501	9	GE	B315921
502	12	GE	No Plate
503	63	GE	B315920
504	18	Kuhlman	66234
505	28	Kuhlman	66233
506	6	Kuhlman	66235
507	ND	AC	1505012
508	ND	AC	1505013
509	ND	AC	1505011
510	ND	GE	F241075
511	ND	GE	F243513
512	ND	GE	F243512
513	9	Westinghouse	5442709
514	1	GE	K451432K71
515	ND	GE	1685723
516	53 SC	GE	B147414-A
517	ND	GE	3115002
518	591 SC	GE	8036912
519	612	GE	7525101
520	150	GE	8174727
521	2	GE	8811099
522	1	GE	8558929
523	ND	AC	1507260
524	ND	AC	1505014
525	ND	AC	1507259
526	4	Kuhlman	16500
527	261	Kuhlman	16499
528	8	Kuhlman	16501
529	218	GE	B768244
None**	510	GE	7525100
None**	<10	Westinghouse	3263053
None**	<10	Westinghouse	3263054
None**	<10	Westinghouse	3263450
422***	<2		

Table 1: Transformer Sampling Information Published in Access Report from 2000.

**No QA/QC data

***ppm amount from label on transformer

Photo 9: Capacitors

Photo 10: Capacitors in overpack

Photo 11: Two of 6 insulators overpacked for disposal

5.0 PCB Analysis of Used Oil for Disposal

Additional site characterization was conducted during the summer of 2008 upon the request of Mr. Duncan to determine if other oils on the site contained PCB's in accordance with *40 CFR§ 761.20(e).* To accomplish this, Mr. Duncan recommended that a representative composite sampling effort was needed before management of used oil, as waste oil under RCRA, for management by ADEC could be permitted.

Chilkat Environmental coordinated with Mr. Duncan to determine eight distinct types of oil to define strata for composite samples. These include; (C-1) hydraulic boxes, (C-2) gear boxes, (C-3) used oil, (C-4) 4 gallons labeled "insulating oil", (C-5) cooling oil tank from steam power generator, (C-6) oils still in vehicles, (C-7) two wet magnetic switches, and (C-8) wet circuit switches. All results using SW 846 Method 8082 were Non-Detect

with acceptable PQL. See Attachment K. Fifty milliliters were extracted from each source and was homogenized in a 1000mL graduated cylinder. The composite was then poured into a 100mL sample container. Sampling equipment was decontaminated between strata and rinsed with solvent between discrete sources within composites. Until composite results were received the fluids were removed and placed in labeled containers next to their sources.

In response to the Non-Detect in all composites Chilkat Environmental removed an estimated 6,200 gallons of waste oil from the site for use at the Bigfoot Auto used oil burner with approval from ADEC.

6.0 Management of Transformers

To determine management of transformers Chilkat Environmental worked closely with EPA and ADEC. Non-detect transformers were pumped, drained in an inverted position and disposed of as scrap metal. Refer to Table 3 for recycled transformers that were Non-Detect for PCB. The Non-Detect oil was accepted by Bigfoot Auto Service for their used oil burner. All PCB waste was removed from the site above 1ppm which is a more stringent standard from ADEC than the 25 ppm required by *40 CFR § 761.61(a)(4)(i)(B)(1).* This more stringent standard of 1 ppm was requested by ADEC pursuant to *AAC 18 74.341(b) Table b1.*

Transformers found to contain from 1 to 50 ppm were drained into appropriately labeled new or reconditioned 55 gallon drums and rinsed for transformer disposal as scrap metal in accordance with *40 CFR § 761.72 and 40 CFR §§ 761.50(a)-(e)* for Removal of PCB containing liquids.

Refer to Table 4 for decontaminated and recycled transformers. Drainage and rinsing occurred in the dip tank basin which is below grade and provided containment and gravity feed. The basin slowly began to fill with groundwater and rain during project activity. Containment was maintained by punching a hole in the basin with an excavator and installing a sump pump. This kept the work area dry. Two layers of 10 mil polyethylene were used to contain potential splashes or spills. An I-beam was placed across the basin to support the plastic containment. (*Photo 12*) No spills occurred.

Transformers were rinsed three times, each time using 10% of the unit volume in #1 Diesel as the solvent. (*Photo 13*) Decontamination rinsate was labeled and disposed of as <50 ppm without further testing. Following the triple rinse they were tilted and drained for 15 hours before being scrapped. No metal surfaces other than actual electrical equipment was found to have been in contact with PCBs and therefore thermal decontamination requirements of *40 CFR §§ 761.50(b)(4)(ii) and 761.79(c)(6)(See 40 CFR§ 761.62(a)(6)* did not apply to known waste at the site.

Transformer	PCB Level	S/N	Weight Pounds	Capacity Gallons
507	ND	1505012	3500	100
508	ND	1505013	3500	100
509	ND	1505011	3500	100
510	ND	F241075	1045	40
511	ND	F243513	1045	40
512	ND	F243512	1045	40
523	ND	1507260	3500	100
524	ND	1505014	3500	100
525	ND	1507259	3500	100
515	ND	1685723	200	10
517	ND	3115002	500	30
None	ND	3263053	1000	40
None	ND	3263054	1000	40
None	ND	3263450	1000	40
422***	<2			

Table 2: Recycled transformers that were Non-Detect for PCB.
*** represents a newer transformer that was found out of service and returned to AP&T as the owner.

Transformer	PCB Level	S/N	Weight Pounds	Capacity Gallons
501	9	B315921	15700	820
502	12	No Plate	15700	820
526	4	16500	6050	235
528	8	16501	6050	235
504	18	66234	4175	116
505	28	66233	4175	116
506	6	66235	4175	116
513	9	5442709	500	20
514	1	K451432K71	530	30
521	2	8811099	2400	75
522	1	8558929	2400	75

Table 3: 1 ppm to 50 ppm Transformers Drained and Rinsed. Dielectric oil and rinsate disposed with Waste Management Inc.

Transformers > 50 ppm were pumped into drums, tilted and drained for 15 hours, resealed, placed in totes and wrapped in polyethylene for shipment to Waste Management Inc. Capacitors and insulators were overpacked and shipped for disposal without draining. Refer to Table 4 for a list of these items.

Transformer	PCB Level	S/N	Weight Pounds	Capacity Gallons
518	591	8036912	2100	72
519	612	7525101	2100	72
527	261	16499	6050	235
None	581	7525100	2100	72
503	63	B315920	15700	820
529	218	B768244	850	35
516	53	5442709	500	30
520	150	8174727	2400	75
Capacitors	Line Material Industries. McGraw-Edison Company. Capacitor with internal discharge resistors: Labeled low-temp. All three overpacked together with the unmarked capacitor.			
1	100%	C267018	100	4
2	100%	C267014	100	4
3	100%	C266915	100	4
unmarked	unknown	unmarked	25	.25
Insulators	All six General Electric insulators labeled Cat. 3b 681 G4. Type 1. Class A69. Instruction Manual GEH-440 and removed from Transformers 501, 502 and 503			
I-501 (pair)		1306909 & 1312096	55 pounds each	2
I- 502 (pair)		1235105 & 1240814	55 pounds each	2
I- 503 (pair)	70.7	1247698 & unlabeled	55 pounds each	2

Table 4: Transformers >50 ppm were drained and shipped for disposal with dielectric oil and rinsate. Capacitors and insulators were shipped for disposal in overpacks without draining.

The six transformers on the powerhouse overhang were drained in place. (*Photos 15, 16 and 17*) After draining they were removed from position using a crane (*Photo 18*) and delivered to the transformer pad for further management.

All other transformers were drained from the transformer pad into drums in the lined containment basin or manually pumped while on the pad. Two transformers, 527 and 503, were too large to fit in totes but were sealed with silicon and shrink wrapped. Additionally, the expansion tank for transformer 503 was packed into a tote. Refer to Photos 19 and 20 demonstrating transformers >50 ppm drained and prepared for shipment.

Two 85 gallon overpacks of PCB contaminated solid waste were generated during project activity. These include used absorbents, gloves, splash suits, plastic sheeting, buckets, hoses and plumbing. Additional PCB waste generated includes one overpack containing a drum of gasoline contaminated with 5.87 ppm PCB.

To support the owner in his effort to remove the PCB contaminated waste from the site for proper shipping and disposal, bid requests were sent to four vendors including a complete inventory of materials discussed in this document. Vendors include; Waste Management Inc., Veolia Environmental, Clean Harbors and Transformer Technologies. Waste Management Inc. was selected and all waste shipped off site by 11/07/2009. During project activities PCB waste was stored on site in accordance with *40 CFR §§ 761.65(c)(9)(i-iii)* and transformers stored for disposal in accordance with *40 CFR § 761.65 and 40 CFR § 761.50(c).* All PCB remediation waste has been removed from all temporary storage areas and disposed of dispelling need for continued storage under *40 CFR §§ 761.65(c)(9)(i)-(iii).*

Photo 12: Transformer draining and rinsing using lined containment basin from former dip tank

Photo 13: Diesel solvent system including tank, 120V pump and delivery nozzle

Photo 14: Photo demonstrating 15 hour drain of tilted transformers with plastic liners to protect from rain

Photo 15: Transformer drainage system and containment berm

Photo 16: Redundant valve and leak proof drainage system for Transformers 504, 505, and 506.

Photo 17: Redundant valves and leak proof drainage for transformers 501, 502 and 503

Photo 18: Removal of the last of 6 transformers from the powerhouse overhang. Transformers were drained in place before removal

Photo 19: Transformer 503 drained and temporarily stored for shipment

Photo 20: Transformers 518, 519, 527, 7525100, 529, 516, 520 and expansion tank for 503 drained and temporarily stored for shipment

Photo 21: Inside of 40 foot container used for shipping dielectric oil and rinsate

Photo 22: Inside of 20 foot container used to ship PCB waste and over 50ppm dielectric oil. A second layer of drums was added along with wood framing to hold drums in place.

Photo 23: Inside of second 40 foot container used to ship transformers and overpacks

7.0 Certificates of Disposal

All transformers > 50 ppm were shipped for disposal by Waste Management Inc. All dielectric oil with detectable PCB > .1 ppm was containerized and shipped for disposal. All rinsate of <50 ppm transformers was shipped for disposal without testing and processed as <50 ppm. Disposal of <50ppm fluids was in accordance with *40 CFR § 761.61(a)(2)(i) and 40 CFR § 761.61(a)(5)(v)(A),* through Waste Management Inc's Chemical Waste landfill which accepts PCB waste subject to TSCA. Disposal of >50ppm fluids was in accordance with *40 CFR § 761.61(a)(2)(ii)* at an incinerator approved by the EPA to accept PCB waste subject to the TSCA.

Refer Tables 5 through 8 below which cross reference inventory with Certificates of Disposal. The Certificates are included as Attachment L. Certificates of disposal for one drum of PCB contaminated gasoline, 17 drums of PCB contaminated rinsate, and estimated 30 gallons of 53 ppm dielectric oil from transformer #516 which was shipped with fluid inside an overpack have been accepted by Waste Management Inc. but are yet to be disposed of. See Attachment L for letters regarding these items. The certificate of disposal for the shell of transformer #516 was received.

Transformer	S/N	Weight	Capacity Gallons	Disposal Method	PCB	Aroclor	Lab/Report #	Profile #	COD Date
501	B315921	15700	820	Fluid Shipped/Shell Onsite	9	1260	JACO #E7103104	Fluid OR300449	1/30/2009
502	No Plate	15700	820	Fluid Shipped/Shell Onsite	12	1260	JACO #E7103104	Fluid OR300449	1/30/2009
526	16500	6050	235	Fluid Shipped/Shell Onsite	4	1260	JACO #E7103104	Fluid OR300449	1/30/2009
528	16501	6050	235	Fluid Shipped/Shell Onsite	8	1260	JACO #E7103104	Fluid OR300449	1/30/2009
504	66234	4175	116	Fluid Shipped/Shell Onsite	18	1260	JACO #E7103104	Fluid OR300449	1/30/2009
505	66233	4175	116	Fluid Shipped/Shell Onsite	28	1260	JACO #E7103104	Fluid OR300449	1/30/2009
506	66235	4175	116	Fluid Shipped/Shell Onsite	6	1260	JACO #E7103104	Fluid OR300449	1/30/2009
513	5442709	500	20	Fluid Shipped/Shell Onsite	9	1242/1260	JACO #E7103104	Fluid OR300449	1/30/2009
514	K451432K71	530	30	Fluid Shipped/Shell Onsite	1	1260	JACO #E7103104	Fluid OR300449	1/30/2009
521	8811099	2400	75	Fluid Shipped/Shell Onsite	2	1262	JACO #E7103104	Fluid OR300449	1/30/2009
522	8558929	2400	75	Fluid Shipped/Shell Onsite	1	1262	JACO #E7103104	Fluid OR300449	1/30/2009

Table 5: Certificates of Disposal for Fluid from Transformers >1ppm and < 50 ppm. Transformer shells were rinsed and shipped as scrap for recycling

Transformer	S/N	Weight	Capacity Gallons	Disposal Method	PCB Level	Aroclor	Lab/Report #	Profile #	COD Date
518	8036912	2100	72	Fluid/Shell Shipped	591 SC	1260	JACO #E7103104	Shell OR300430 Fluid OR300428	Shell 1/6/2009 Fluid 1/22/2009
519	7525101	2100	72	Fluid/Shell Shipped	612	1260	JACO #E7103104	Shell OR300430 Fluid OR300428	Shell 1/6/2009 Fluid 1/22/2009
527	16499	6050	235	Fluid/Shell Shipped	261	1260	JACO #E7103104	Shell OR300430 Fluid OR300428	Shell 1/6/2009 Fluid 1/22/2009
None	7525100	2100	72	Fluid/Shell Shipped	581	1260	Test America #BRG0110	Shell OR300430 Fluid OR300428	Shell 1/6/2009 Fluid 1/22/2009
503	B315920	15700	820	Fluid/Shell Shipped	63	1242/1254/1260	JACO #E7103104	Shell OR300430 Fluid OR300428	Shell 1/6/2009 Fluid 1/22/2009
529	B768244	850	35	Fluid/Shell Shipped	218	1254/1260	JACO #E7103104	Shell OR300430 Fluid OR300428	Shell 1/6/2009 Fluid 1/22/2009
516	5442709	500	30	Fluid/Shell Shipped	53	1260	JACO #E7103104	Shell OR300430 Fluid shipped in transformer	Shell 6/8/2009 No COD received for fluid
520	8174727	2400	75	Fluid/Shell Shipped	150	1254/1260	JACO #E7103104	Shell OR300430 Fluid OR300428	Shell 1/6/2009 Fluid 1/22/2009

Table 6: Certificates of Disposal for fluid and shells from Transformers >50ppm

Transformer	S/N	Weight	Capacity Gallons	Disposal Method	PCB Level	Aroclor	Lab/Report #	Profile #	COD Date
CAPACITORS									
1	C267018	100	4	Shipped	100%	1242	Test America #BRG0170	Fluid/Shell OR300430	12/23/2008
2	C267014	100	4	Shipped	100%	1242	Assumed the same	Fluid/Shell OR300430	12/23/2008
3	C266915	100	4	Shipped	100%	1242	Assumed the same	Fluid/Shell OR300430	12/23/2008
INSULATORS									
Insulators 501	1306909 & 1312096	110	2	Shipped	70.7	1260	Assumed the same	Fluid/Insulator OR300430	12/23/2008
Insulators 502	1235105 & 1240814	110	2	Shipped	70.7	1260	Assumed the same	Fluid/Insulator OR300430	12/23/2008
Insulators 503	1247698 & Unlabeled	110	2	Shipped	70.7	1260	Test America #BRG0331	Fluid/Insulator OR300430	12/23/2008

Table 7: Certificates of Disposal for Capacitors and Insulators. These were shipped in overpacks containing their fluids

Other Items		Quantity	Disposal Method	Profile #	COD Date
PCB Solids		1 Drum	Shipped	OR300429	12/23/2008
PCB Pumps		1 Drum	Shipped	OR300446	1/6/2009
PCB Plumbing and Solid Waste		1 Drum	Shipped	OR300446	1/6/2009
PCB Contaminated Gas		1Drum	Shipped	OR300436	Refer to Attachment M for letter from Waste Management Inc. No COD received
PCB contaminated Rinsate		17 Drums	Shipped	OR301056	Refer to Attachment M for letter from Waste Management Inc. No COD received

Table 8: Certificates of Disposal for Other PCB waste

8.0 Verification Sampling

A teleconference was held 4.30.09 for Chilkat Environmental, EPA and ADEC to discuss verification sampling requirements for the Chilkoot Lumber Company as required by *40 CFR §§ 761.61(a)(6)(i)-(ii).* The discussion led to a sampling plan that was conducted 5.07.09.

Verification sampling is intended to satisfy characterization requirements of *40 CFR Part 761 Subpart N: Site Characterization Sampling for PCB remediation Waste under 40 CFR § 761.61(a)(2).* Verification sampling analysis relied on PCB Methods 3500B/3540C and analyses by EPA Method 8082 in accordance with *40 CFR § 761.61(a)(5)(iv) and 40 CFR § 761.292 (Subpart O).*

The sampling plan required analyses of soil and concrete at the last known locations of transformers documented in the Inventory of Transformers at the Chilkoot Lumber Company in Haines Alaska submitted 6.26.08. Concrete was sampled following an approved procedure from Region 1 of the EPA titled, "Standard Operating Procedure for Sampling Porous Materials for PCB's", Revision 2 dated 4.10.08. Additional sampling was conducted 5.29.09 and 6.10.09 to follow up composite samples with discrete samples.

8.1 Verification Sampling Site Selection

Sampling locations for the 5.07.09 event included one soil composite and two porous material composites. The soil composite included soil sampled from under the connex used to store transformers, the transformer overhang on the former powerhouse building and the transformer shed adjacent to the generator building. Samples were distributed exactly where transformers were located. Composites were collected from 100 square foot grids of the transformer pad for C-1 and 10 square foot grids for the remaining samples. See photos below of soil composite sampling locations for sample C-3 and field duplicate C-3a.


Photo 24 and 25: Location of soil composite sample at former location of connex that stored transformers. Sample C-3 and composite duplicate-3a


Photo 26 and 27: Location of soil composite sample at former location of transformer overhang. Sample C-3 and composite duplicate-3a.


Photo 28 and 29: Location of soil composite sample at former transformer shed (#510) adjacent to generator building. Sample C-3 and field duplicate-3a.

Two porous material composites were collected to characterize concrete at locations used to store transformers. C-1 was collected from the transformer pad which stored many transformers and was used for draining and rinsing transformers summer of 2008 by Chilkat Environmental. The pad was approximately 100' by 12' and was divided into 10 grid sections with each grid having a 20 ml sample taken from throughout the grid.

C-2 and field duplicate C-2a was collected from 3 locations including; the main transformer enclosure featuring #513, outside the main enclosure at site of former #514 and the small concrete pad adjacent to transformer pad that featured former #529. Each sampling location was representatively sampled in the upper ½ inches for a total of 40mL per composite source.


Photo 30 and 31: Location of C-1 porous material sample at transformer pad.


Photo 32 and 33: Location of porous material sample at main transformer enclosure featuring #513 and six non-detect transformers. Sample C-2 and field duplicate C-2a.


Photo 34 and 35: Location of porous material sample at small concrete pad adjacent to transformer pad that featured former #529. Sample C-2 and field duplicate C-2a.

Photo 36 and 37: Location of porous material sample outside main transformer enclosure that featured former #514. Sample C-2 and field duplicate C-2a.

8.2 Results of May 7, 2009 Verification Sampling Event

Samples were collected May 7, 2009 and received by Test America in Bothell, WA on May 11. The laboratory report was produced May 26 as Work Order BSE 0106 and Project Number 88087500. Laboratory report included as Attachment M.

Results for C-1 representing the transformer pad were non-detect for PCB.

Results for C-2 were just above the Method Reporting Limit (MRL) of 26.4 ppb at 31.7 ppb for Aroclor 1260. The transformers formerly stored at the sampled locations include; Transformer #513 tested as 9 ppm Aroclor 1260 at the site of the main enclosure, Transformer #514 tested as 1 ppm of Aroclor 1260 from outside the main enclosure and Transformer #529 tested as 218 ppm for Aroclor 1260 at the small concrete pad adjacent to transformer pad.

Results for C-3 were above the MRL of 29.3 ppb at 84.1ppb for Aroclor 1242. Transformer #503 on the overhang was tested as 63 ppm Aroclor 1242. Subsequent sampling was conducted at the location of #503 beneath the powerhouse overhang to discreetly sample the composite source suspected of elevating the sample above the MRL.

The quality and representativeness of the data was measured by collection of field duplicates for each media. This includes C-2a for porous material and C-3a for soil. Results for C-2a were 27.6 ppb and C-3a was 62.6 ppb. These results are very similar to their field duplicate counterparts of 31.7 and 84.1 respectively.

8.3 Results of May 29, 2009 Verification Sampling Event

Chilkat Environmental re-sampled the site of the transformer overhang to verify that the suspected site was below clean-up levels. Three samples were collected in addition to a field duplicate. Samples were received by Friedman and Bruya of Seattle, WA on June 1 and laboratory report produced June 11. The laboratory report 906002 in included as Attachment N. All results were non-detect.

8.4 Results of June 10, 2009 Verification Sampling Event

Chilkat Environmental re-sampled the other 2 sources of composite C-3 to verify that upon discrete testing they were below clean-up levels. Samples were received by Friedman and Bruya of Seattle, WA on June 11 and laboratory report 906112 produced June 19. *(Attachment O)* All results were non-detect.

9.0 Summary of Verification Sampling

A designation of clean-up complete is recommended for PCB concerns at the Chilkoot Lumber Company site. The clean-up level for PCB in soil under Alaska Department of Environmental Conservation 18 AAC 75 is 1.0 ppm. The highest level detected in a composite sample at the remediated site was 84.1 ppb or 0.0841 ppm. Chilkat Environmental is confident that PCB concerns at the site have been addressed by the removal of transformers and electrical equipment during the summer of 2008.

10.0 Project Costs

This project has been entirely funded by Ed Lapeyri, current owner of the former Chilkoot Lumber Company site. All transformers and PCB containing electrical equipment discussed in this report were present on the property when the mill was purchased by Mr. Lapeyri on 11/07/1986 from Alaska Resources Corporation (ARC). During the first year of ownership the mill was upgraded, painted and cleaned with the first logs milled in November 1987. The mill operated for 3 years and closed in 1991. No income has been earned from Chilkoot Lumber Company since that time.

The mill was originally constructed and operated by John Schnabel in 1968. Prior to purchase of the mill by Ed Lapeyri it was owned by Pacific Forest Products in the early 1980's until it went bankrupt and the mill was repossessed by ARC. It was during Pacific Forest Products ownership that the hog fuel power plant construction began. After ownership transferred to Ed Lapeyri, Onsite Energy became a 50% partner in the power plant facility, with Ed Lapeyri as the silent owner of the other 50%. The power plant was completed and began its operation under management by Onsite Energy. Onsite Energy was in charge of the power plant and back-up diesel generators that supplied the power for the mill. The power plant continued to operate after Onsite Energy's portion of ownership was purchased by Ed Lapeyri prior to closure of the mill. The power plant also supplied power to the City of Haines during portions of its operation.

The majority of transformers by size and quantity were associated with the hog fuel power plant, managed by Onsite Energy. When the property was purchased from the State of Alaska in 1986 no TSCA documentation was provided and Mr. Lapeyri was not informed of the liability involved in management of the PCB equipment. The transformers and equipment at the mill remained unregistered and not properly documented until summer of 2008 when Chilkat Environmentalactivities began.

This project cost $211,000.00 in 2008 to accomplish removal of all transformers, draining, rinsing, containment of fluids, and free product testing. Shipping and disposal of the waste cost an additional $70,000.00 in 2009 and final verification sampling and preparation of this report cost an estimated $9,000.00.

In accordance with *40 CFR §§ 761.61(a)(6)(i)-(ii) and 40 CFR § 761.61(a)(9) and 40 CFR §§ 761.125(c)(5)(i-ix)* the cost of this project was calculated as $290,000.00 with 1200 employee hours.

11.0 PCB Remedial Action Closure Report Summary

All PCB waste above 1 ppm has been removed from the Chilkoot Lumber Company site and no additional precautions during future modification, renovation, or demolition of the facility is recommended. Further management of remedial action at the mill is ongoing to address petroleum contamination and other concerns. Please consider this closure request and contact us if any more information is needed.

Attachments

Attachment A:
EPA Letter 11.2.00

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

November 2, 2000

Reply To
Attn Of: WCM-128

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

NOTICE OF NONCOMPLIANCE
LETTER OF ADVISEMENT

Ed Lapeyri, President
Haines Sawmill
P.O. Box 1469
Haines, Alaska 99827

Dear Mr. Lapeyri:

This concerns the July 16, 1999, Environmental Protection Agency (EPA) inspection which was conducted at the Haines Sawmill a.k.a. Chilkoot Lumber Company in Haines, Alaska. The inspection was conducted by Andrew Hess of the Office of Environmental Assessment, to determine compliance with the federal PCB (polychlorinated biphenyl) regulations which were promulgated pursuant to the Toxic Substances Control Act (TSCA).

We have reviewed the inspection report and during the inspection, the following violations of the PCB regulations were documented.

REGULATION - MARKING

40 C.F.R. § 761.40 requires that PCB Transformers, Large PCB Capacitors, PCB Containers, and storage areas used to store PCBs and PCB Items be marked in accordance with 40 C.F.R. § 761.45 unless the Item or Container is too small to accommodate the 6 X 6 inch PCB label.

VIOLATIONS ONE AND TWO

Haines Sawmill failed to mark two (2) PCB Transformers in the sawmill in accordance with 40 C.F.R. § 761.45. This constitutes violations of 40 C.F.R. § 761.40.

REGULATION - RECORDS & MONITORING

40 C.F.R. § 761.180(a) provides that, beginning July 2, 1978, each owner or operator of a facility using or storing at one time at least 45 kilograms (99.4 pounds) of PCBs contained in PCB Container(s), or one or more PCB Transformers, or 50 or more PCB Large High or Low Voltage Capacitors, shall develop and maintain records on the disposition of the PCBs and PCB Items. The records shall form the basis of an annual

document prepared for each facility by July 1, covering the previous calendar year. The following information for each facility shall be included in the annual document:

1) The dates when PCBs and PCB Items are removed from service, are placed into storage for disposal, and are placed into transport for disposal. The quantities of the PCBs and PCB Items shall be indicated using the following breakdown:

   I) Total weight in kilograms of any PCBs and PCB Items in PCB Containers, including the identification of container contents such as liquids and capacitors;
   ii) Total number of PCB Transformers and total weight in kilograms of any PCBs contained in the transformers; and
   iii) Total number of PCB Large High or Low Voltage Capacitors.

2) For PCBs and PCB Items removed from service, the location of the initial disposal or storage facility and the name of the owner or operator of the facility.

3) Total quantities of PCBs and PCB Items remaining in service at the end of the calendar year, using the following breakdown:

   I) Total weight in kilograms of any PCBs and PCB Items in PCB Containers, including the identification of container contents such as liquids and capacitors;
   ii) Total number of PCB Transformers and total weight in kilograms of any PCBs contained in the transformers; and
   iii) Total number of PCB Large High or Low Voltage Capacitors.

VIOLATIONS THREE THROUGH SIX

Haines Sawmill failed to prepare annual document logs for calendar years 1995, 1996, 1997 and 1998 in accordance with 40 C.F.R. § 761.180(a). This constitutes several violations.

REGULATION - STORAGE

40 C.F.R. § 761.65(b) requires that any facility used for the storage of PCBs and PCB Items designated for disposal meet the following criteria:

1) Adequate roof and walls to prevent rain water from reaching the stored PCBs and PCB Items;
2) An adequate floor which has continuous curbing with a minimum six inch high curb. The floor and curbing must provide a containment volume equal to at least two times the internal volume of the largest PCB Article or PCB Container stored therein or 25 percent of the total internal volume of all PCB Articles or PCB Containers stored therein, whichever is greater;
3) No drain valves, floor drains, expansion joints, sewer lines, or other openings that would permit liquids to flow from the curbed area;

4) Floors and curbing constructed of continuous smooth and impervious materials, such as Portland cement concrete or steel, to prevent or minimize penetration of PCBs; and
5) A site that is not located below the 100-year flood water elevation.

VIOLATION SEVEN

Haines Sawmill failed to properly store transformers in the mill area for disposal. This constitutes a violation of 40 C.F.R. § 761.65(b).

REGULATION - STORAGE

40 C.F.R. § 761.65(c)(5) requires that all PCB Articles and Containers in storage be checked for leaks at least once every 30 days. Any leaking PCB Articles or Containers and their contents shall be transferred immediately to properly marked non-leaking containers. Any spilled or leaked materials shall be immediately cleaned up and the PCB contaminated materials shall be disposed of in accordance with § 761.60(a)(4). Spilled or leaked material constitutes the disposal of PCBs (40 C.F.R. § 761.60(d)).

VIOLATIONS EIGHT

Haines Sawmill failed to inspect the transformers in the mill area every 30 days, as required by 40 C.F.R. § 761.65(c)(5). This constitutes a violation.

REGULATION - STORAGE

40 C.F.R. § 761.65(c)(8) requires that PCB Articles and Containers be dated on the article or container when they are placed in storage.

VIOLATION NINE

Haines Sawmill failed to date the transformers stored for disposal in the mill area as required by 40 C.F.R. § 761.65(c)(8).

REGULATION - NOTIFICATION

40 C.F.R. § 761.205(a)(2) provides that all generators (other than generators exempt from notification under paragraph (c)(1) of this section), commercial storer, transporters, and disposers of PCB waste who first engage in PCB waste handling activities after February 5, 1990, shall notify EPA of their PCB waste activities by filing EPA Form 7710-53 with EPA prior to engaging in PCB waste handling activities.

VIOLATION TEN

Haines Sawmill failed to notify EPA of its waste handling activity. This constitutes a violation of 40 C.F.R. § 761.205(a)(2).

REGULATION - LEAKING

If the area is determined to be contaminated, initiation of cleanup of the contamination should occur immediately pursuant to the Spill Cleanup Policy, as identified in 40 C.F.R. part 761, subpart G. 40 C.F.R. § 761.50(a)(4) requires that spills and other uncontrolled discharges of PCB concentrations of 50 ppm or greater constitute a disposal of PCBs.

VIOLATION ELEVEN THROUGH FIFTEEN

The transformers (Serial Numbers B147414-A, 7525100, 7525101, 8036912, and 8174727B) were leaking. This constitutes a violation of 40 C.F.R. § 761.30(a)(1)(x) that requires the cleanup of any leaking material and the proper disposal according to the disposal requirements of subpart G.

REGULATION - FAILURE TO NOTIFY EPA

Any generator, commercial storer, transporter, or disposer of PCB waste who is required to have an EPA ID number must notify EPA of his/her PCB waste handling activities, using the notification procedures and form described in 40 C.F.R. § 761.205. This constitutes a violation of 40 C.F.R. § 761.202.

VIOLATION SIXTEEN

The Haines Sawmill has not received an identification number from EPA nor notified EPA of the PCB waste activity.

REGULATION - REGISTER WITH FIRE RESPONSE

The company must register PCB transformers in writing with fire response personnel with primary jurisdiction within 30 days of discovery as identified in 40 C.F.R. § 761.30(a)(xv)(E).

VIOLATION SEVENTEEN

The two PCB transformers were not registered with the Haines fire department in violation of 40 C.F.R. § 761.30(a)(xv)(E).

This letter constitutes formal notification of the violations of the federal PCB regulations which was documented by the inspection. To ensure future compliance with the federal PCB regulations, you should immediately take the following steps, if not already done so:

(1) Provide the out of service dates, manifests and certificates of disposal/destruction date for the transformers in the mill area as required by 40 C.F.R. § 761.65 and 40 C.F.R. § 761.218.

(2) If possible, provide the annual document logs for 1995, 1996, 1997 and 1998 as required by 40 C.F.R. § 761.180(a).

(3) If possible provide monthly inspection reports for the PCB transformers in the mill area as required by 40 C.F.R. § 761.65(c)(8).

(4) Place the transformers, being stored for disposal, in a proper storage for disposal area.

(5) Leaking PCB and PCB-contaminated transformers require clean-up action within 48 hours

Within fifteen (15) days of receipt of this letter, please advise EPA of the corrective actions your facility has taken or will take to promptly bring your facility into compliance with the PCB regulations, and respond to the advisory items 1 through 5 above.

You should be advised that TSCA authorizes penalties up to $ 27,500 per day for each violation. Criminal penalties are authorized for knowing and willful violations of the law. Correcting the conditions noted in this letter may prevent future violations. However, it will not provide protection from Agency enforcement action for those violations that have already occurred. Nothing in this letter should be construed to waive or limit any remedy available to EPA by virtue of conditions at your facility or the acts or omissions of your company. We may notify EPA's Region 10 Office of Regional Counsel of this case for possible enforcement action if the PCB and PCB-contaminated items are not properly disposed of.

Please understand that the aforementioned steps are being recommended to avoid risk to human health and the environment. Your company bears the ultimate responsibility for taking all steps necessary to comply with the law.

If you have any questions, please contact Daniel Duncan, Regional PCB Program Manager, Office of Waste and Chemicals Management, WCM-128, EPA Region 10, 1200 Sixth Avenue, Seattle, Washington 98101; Telephone (206) 553-6693.

Sincerely,

Montel Livingston

Montel Livingston, Manager
Solid Waste and Toxics Unit

cc: Anne Marie Palmieri, ADEC

Attachment B:
EPA Letter 2.23.01

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

February 23, 2001

Reply To
Attn Of: WCM-128

Mr. Larry Beck, General Manager
Chilkoot Lumber Company, Inc.
P.O. Box 1469
Haines, Alaska 99827

Re: Polychlorinated Bi-Phenyl (PCB) Remediation at
Chilkoot Lumber Company, Inc.
Haines Sawmill, Haines, Alaska
Self-Implementing Remediation Under 40 CFR § 761.61(a)

Dear Mr. Beck:

This letter is in response to your January 25, 2001, letter regarding the PCB remediation at the Chilkoot Lumber Company Haines Sawmill located in Haines, Alaska. We have reviewed the Access Consulting Group Haines Sawmill Cleanup Plan: Final Report, which was submitted to address the remediation of the polychlorinated bi-phenyl (PCB) waste, including a potentially contaminated storage area and soils at the Chilkoot Lumber Company Haines Sawmill Site.

We have reviewed your January 25, 2001 Haines Sawmill Cleanup Plan, for Polychlorinated Bi-Phenyl (PCB) sampling, cleanup and removal of PCB contamination which resulted from releases of Toxic Substances Control Act (TSCA) regulated PCBs at the Chilkoot Lumber Company which has been identified as a possible location for PCB contaminated soils. We also understand that three PCB transformers and five PCB-contaminated transformers will be stored for reuse indefinitely at the Haines Sawmill Site in accordance with 40 CFR §761.35(c)(1). You should note that you must store the PCB Transformers and PCB-contaminated transformers in a unit that meets the requirements of 40 CFR § 761.65(b).

In addition, the PCB transformers stored for reuse must be registered with the EPA, National Program Chemicals Division, Office of Pollution Prevention and Toxics (7404), Ariel Rios Building, 1200 Pennsylvania Avenue, NW, Washington, D.C. 20460, under the requirements of 40 CFR § 761.30(a)(1)(vi)(A). A copy of the PCB Transformer Registration form (EPA Form 7720-12) is included for your information and use.

Your proposed PCB cleanup plan for the Haines Sawmill Site, as described in your January 25, 2001 letter, is acceptable to EPA Region 10. As stated in your plan, Chilkoot Lumber Company will perform the actions listed below and our acceptance of the PCB cleanup proposal is conditional upon your agreement to the following:

1. Chilkoot Lumber Company, will complete the following by June 29, 2001:

   a. The complete remediation of PCB remediation waste at the Chilkoot Lumber Company Haines Sawmill Site in accordance with 40 CFR § 761.61(a).

   b. Utilize decontamination solvents, as applicable, in accordance with 40 CFR § 761.79(c).

   c. The removal of all PCB remediation waste from the Chilkoot Lumber Company Haines Sawmill Site to include PCB contaminated soils.

   d. The disposal/incineration of all PCB remediation waste, from the Chilkoot Lumber Company Haines Sawmill Site with a PCB concentration of < 50 ppm in accordance with 40 CFR § 761.61(a)(2)(i) and 40 CFR § 761.61(a)(5)(v)(A), in a state regulated municipal waste landfill, a RCRA Subtitle C landfill, a non-hazardous non-municipal waste landfill subject to the requirements of 40 CFR §§ 257.5 through 257.30, or in a chemical waste landfill or at an incinerator approved by the EPA to accept PCB waste subject to the Toxic Substances Control Act (TSCA).

   e. The disposal/incineration of all PCB remediation waste, from the Chilkoot Lumber Company Haines Sawmill Site with a PCB concentration of ≥ 50 ppm in accordance with 40 CFR § 761.61(a)(2)(ii), in a state regulated hazardous waste landfill permitted by EPA under section 3004 of RCRA, or permitted by a state under section 3006 of RCRA, or in a chemical waste landfill or at an incinerator approved by the EPA to accept PCB waste subject to the Toxic Substances Control Act (TSCA).

   f. The notification of continued use of porous surfaces contaminated with PCBs regulated for disposal by spills of liquid PCBs in accordance with 40 CFR §§ 761.30(p)(1) - (2). The removal of a porous surface contaminated with PCBs from its location or current use is prohibited except for removal for disposal of PCBs in accordance with 40 CFR § 761.61 or 40 CFR § 761.79 for surfaces contaminated by spills or 40 CFR § 761.62 for manufactured porous surfaces.

   g. The disposal/incineration of all PCB bulk product waste from the Chilkoot Lumber Company Haines Sawmill Site in accordance with 40 CFR §§ 761.62(a)(1) - (7).

h. Provide copies of Certificates of Disposal for the disposal of the PCB wastes.

i. Provide copies of Certificates of Destruction for the incineration of the PCB wastes.

j. The identification on all appropriate facility drawings the location of PCBs remediated at the Chilkoot Lumber Company Haines Sawmill Site.

k. Perform the required PCB verification sampling in accordance with 40 CFR §§ 761.61(a)(6)(i)-(ii).

l. Perform the required PCB verification sampling analysis using PCB Methods 3500B/3540C or Method 3500B/3500B and the chemical analyses by EPA Method 8082 in accordance with 40 CFR § 761.61(a)(5)(iv) and 40 CFR § 761.292 (Subpart O).

m. Retain the records required under 40 CFR §§ 761.125(e)(5)(i)-(iv) and 40 CFR §§ 761.61(a)(3) - (a)(5).

n. Request alternative decontamination or sampling approval as applicable in accordance with 40 CFR § 761.79(h).

o. Provide a copy of the PCB Remediation characterization plan in accordance with 40 CFR Part 761, Subpart N: Site Characterization Sampling for PCB remediation Waste under 40 CFR § 761.61(a)(2) to EPA Region 10 no later than June 29, 2001.

2. Chilkoot Lumber Company will provide to EPA Region 10 and the Alaska Department of Environmental Conservation (ADEC) a final report documenting the completion of the above items. This report will be provided no later than July 31, 2001 for the PCB remediation. This report will also include:

a. The results of all PCB sampling and disposal. This will include the characterization as well as verification sampling required under 40 CFR § 761.61(a). If alternative PCB sampling is required, the basis of that determination will be provided to EPA for review and approval under 40 CFR § 761.79(h).

b. The results of the removal of all PCB contamination to less than 1 ppm PCBs.

c. Information on additional pre- and post-cleanup sampling as well as the estimated cost of the cleanup by man-hours and dollars in accordance with 40 CFR §§ 761.61(a)(6)(i)-(ii) and 40 CFR § 761.61(a)(9) and 40 CFR §§ 761.125(c)(5)(i-ix). Although not required for compliance with the PCB Spill Cleanup Policy at 40 CFR § 761.125 (c)(5), this information should also be maintained by Chilkoot Lumber Company as well as the Alaska Department of Environmental Conservation (ADEC).

d. Information on the quantity and the concentration of the PCBs (including Aroclors) removed from the Chilkoot Lumber Company Haines Sawmill Site.

e. Information regarding the specific PCB remediation methods including the specific solvents under 40 CFR § 761.79(d) used to remediate the PCBs at the Chilkoot Lumber Company Haines Sawmill Site.

This determination by EPA does not obviate Chilkoot Lumber Company from the responsibility to comply with requirements of other federal laws and applicable Washington State requirements under the Alaska Administrative Code (AAC) for Polychlorinated Bi-Phenyls (PCBs) nor does EPA waive any requirements to cleanup more widespread contamination from the Chilkoot Lumber Company Haines Sawmill Site.

If any additional information is required, please contact Daniel Duncan, Regional PCB Program Manager, Office of Waste & Chemicals Management, 1200 Sixth Avenue (WCM-128), Seattle, Washington 98101. He can be reached at (206) 553-6693. In addition, if you have any PCB sampling questions, please contact Dr. Bruce Woods of our Office of Environmental Assessment on (206) 553-1193.

Sincerely,

Montel Livingston

Montel Livingston, Manager
Solid Waste and Toxics Unit

Enclosure

cc: Ms. Anne-Marie Palmieri, ADEC

Attachment C:
EPA Letter 2.15.08

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

Reply To
Attn Of: OCE-084, Suite 900

FEB 15 2008

CERTIFIED MAIL: RETURN RECEIPT REQUESTED

LETTER OF ADVISEMENT

Mr. Ed Laperyi, President
Chilkoot Lumber Company
P.O. Box 1469
Haines, Alaska 99827

Re: PCB Inspection Report Review- Extension Approval

Dear Mr. Laperyi:

This letter is in regards to the United States Environmental Protection Agency, Region 10 (EPA) August 21, 2007, inspection conducted at the Alaska Department of Environmental Conservation (ADEC) request, at the Chilkoot Lumber Company, Inc., aka Haines Sawmill, located in Haines, Alaska. We have reviewed your January 24, 2008, extension request and our previous July 16, 1999, EPA inspection as well as the 2002 Access Consulting Group PCB Electrical Equipment and PCB Transformer Inventory. The August 21, 2007, EPA inspection was conducted by Mr. Bruce Long of our Office of Compliance and Enforcement to determine compliance of your facility with the Polychlorinated Bi-Phenyl (PCB) regulations at 40 CFR Part 761, promulgated under the Toxic Substances Control Act (TSCA).

In order to complete our review of the August 21, 2007, inspection report and the information that you provided on September 6, 2007, we request that you provide the following information by April 30, 2008:

1) An EPA TSCA PCB identification number notification noting the current facility location at Mile Post 5 on Lutak Highway, Haines, Alaska as required under 40 CFR § 761.208.

2) Copies of inspection records for 2005, 2006, and 2007 (through August 21, 2007) at the current location for the PCB General Electric & Transformers with Serial Numbers (S/Ns) 8036912, 7525101, and 7525100 as required under 40 CFR § 761.30.

3) Copies of the PCB Transformer Registrations for the three PCB Transformers that were present at the location at the time of the EPA Inspection: GE Serial Numbers/Plant Numbers: 8036912/518; 7525101/519; 7525100/None; as required under 40 CFR § 761.30.

4) Copies of the manifests for the PCB Electrical Equipment and PCB Transformers located at the Chilkoot Lumber Company at the time of the August 21, 2007, inspection as well as the certificates of disposal/destruction for these manifests.

5) Copies of the Annual Document Log/Record for the Chilkoot Lumber Company for calendar years 2004, 2005, and 2006 as required by 40 CFR § 761.180(b). This includes the documentation for the PCB Transformers, PCB Electrical Equipment and all other PCB articles. Provide all documentation required under 40 CFR § 761.35 for PCB Transformers and Electrical Equipment place in storage for reuse.

6) Provide documentation including photographs of proper storage of PCBs as required under 40 CFR § 761.65(b), required marking under 40 CFR § 761.40 with an M_L label for all PCB Transformers, as well as the required dating of the PCB Transformers, PCB Contaminated Electrical Equipment, and all PCB Articles placed into storage for disposal.

7) Provide documentation including photographs for the proper storage for disposal of PCB Transformers and PCB Electrical Equipment under 40 CFR § 761.65(b). Provide the out-of-service dates for all PCB Transformers and PCB Electrical Equipment that had been removed from service prior to August 21, 2007 as required under 40 CFR § 761.65(a).

8) The documentation of the PCB concentration in the used oil that was stored in containers marked "Used Oil" at the time of the EPA inspection as required under 40 CFR § 761.20(e). Analytical data on the PCB concentration in the Powerhouse drains as required under 40 CFR § 761.60.

If any additional information is required please contact Daniel Duncan, Regional PCB Program Coordinator at (206) 553-6693, or duncan.daniel@epa.gov, if you have any questions.

Sincerely,

Scott E. Downey

Scott E. Downey, Manager
Pesticides and Toxics Unit

cc: Bruce Wanstall, ADEC

CHILKOOT LUMBER COMPANY, INC.
PO BOX 1469
HAINES, AK 99827

File copy

April 24, 2008

Mr. Scott Downey, Manager Pesticides and Toxic Unit
US Environmental Protection Agency, Region 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101

Re: PCB Inspection Report Review

Dear Mr. Downey:

In reply to your request for information regarding the PCB transformers stored for reuse at the Chilkoot Lumber Co, we find it very difficult to respond in a manner that makes much sense.

Chilkoot Lumber Co has no EPA TSCA PCB identification. Please forward necessary application.

CLC has never formalized an inspection procedure, although personnel have inspected all the transformers several times a year for leaks or other possibly endangering occurrences.

We have no known registrations for these transformers.

Enclosed is a listing of transformers on site, showing their location on the CLC property as well as the PCB concentration in parts per million.

We don't have any more known PCB Electrical equipment present on site.

Chilkoot Lumber at the recommendation of Mr. Bruce Long, EPA Inspector from Oregon Operations Office, moved the two PCB Transformers, GE #'s 8036912 and 7525101 into a steel shipping container # 4815431, (see enclosed pictures), marked with the correct labels. GE Transformer, # 7525100, is still in its transformer enclosure adjacent to the diesel shed and will be placed into the container along with GE transformer # B768244 which was moved from the chip blow house at the onset of winter snowfall and placed into plastic containers for protection.

The used oil was tested for PCB contamination, by Carson Dorn, Inc. in conjunction with SPECTRA Laboratories of Tacoma WA. The Case Narrative, the analysis report, and a spread sheet prepared by Carson Dorn's Steve Haavig are enclosed for your inspection. The one power house drain which was accessible during Mr. Haavig's sampling visit was tested; ice from ground runoff was covering any others. The drain tested was within 15-

20 feet of GE transformer # B147414-A and would have caught any run off from that transformer. The other drain is adjacent to the main transformer enclosure which contains only transformers with non-detect for PCB readings.

At this time Chilkoot Lumber is talking with three firms for the salvage rights for removal of the remaining mill buildings and scrap equipment. The removal of all the transformers using approved procedures is a requirement for any contract that may be signed. We have high hopes that this summer will see the end of any PCB concerns at this sight. Thank you for your patience in this matter.

Yours truly,

Ed Lapeyri, President

Enclosures:

Table 1 Inventory of Electrical Transformers

TRANSFORMER MANUFACTURER	TRANSFORMER SERIAL NUMBER	TRANSFORMER COMPANY NUMBER	PRESENT LOCATION	PCB CONCENTRATION (PARTS PER MILLION)
General Electric	B315921	501	Power house overhang (area 14)	9
General Electric	NO PLATE	502	Power house overhang (area 14)	12
General Electric	B315920	503	Power house overhang (area 14)	63
General Electric	66234	504	Power house overhang (area 14)	18
General Electric	66233	505	Power house overhang (area 14)	28
General Electric	66235	506	Power house overhang (area 14)	6
AC	1505012	507	Main enclosure (area 8)	ND
AC	1505013	508	Main enclosure (area 8)	ND
AC	1505011	509	Main enclosure (area 8)	ND
General Electric	F241075	510	Main enclosure (area 8)	ND
General Electric	F243513	511	Main enclosure (area 8)	ND
General Electric	F243512	512	Main enclosure (area 8)	ND
Westinghouse	5442709	513	Main enclosure, on floor (area 8)	9
General Electric	K451432K71	514	On floor outside enclosure (area 10)	1
General Electric	1685723	515	Van	ND
General Electric	B147414-A	516	Van	53 SC
General Electric	3115002	517	Van	ND
General Electric	8036912	518	Van	591 SC
General Electric	7525101	519	Van	612
General Electric	8174727	520	Van	150
General Electric	8811099	521	Van	2
General Electric	8558929	522	Van	1
AC	1507260	523	Concrete Pad	ND
AC	1505014	524	Concrete Pad	ND
AC	1507259	525	Concrete Pad	ND
Kuhlman	16500	526	Concrete Pad	4
Kuhlman	16499	527	Concrete Pad	261
Kuhlman	16501	528	Concrete Pad	8
General Electric *	B768244	529	outside van in Plastic Cont.	218
General Electric *	7525100	None	Shed by diesel plant (area 9)	510
Westinghouse *	3263053	None	Office pad mount (area 11)	<10
Westinghouse *	3263054	None	Office pad mount (area 11)	<10
Westinghouse *	3263450	None	Office pad mount (area 11)	<10

Notes: *ND = none detected, SC = Standard Check. Bold indicates transformers that exceed US EPA criteria.*

** Transformer analytical results provided by ASL Laboratories. All remaining transformers tested by Jaco Analytical.*

Attachment D:
EPA Letters 6.26.08 and 7.8.08

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

DRAFT

Reply To
Attn Of: OCE-084, Suite 900

Mr. Ed Laperyi, President
Chilkoot Lumber Company
P.O. Box 1496
Haines, Alaska 99

Mr. Elijah Donat, MS PHP
Chilkat Environmental LLC
P.O.Box 865
Haines, Alaska 99827

Re: PCB Remediation Approval/Inventory Review

Dear Messrs. Laperyi and Donat:

The Environmental Protection Agency, Region 10 (EPA) has reviewed your June 26, 2008, Polychlorinated Bi-Phenyl (PCB) Electrical Equipment and Transformer Inventory and Remediation Cleanup Workplan for sampling, cleanup, and removal of PCB contamination which resulted from releases of Toxic Substances Control Act (TSCA) regulated PCBs at the Chilkoot Lumber Company Site located in Haines, Alaska. Your proposed PCB Cleanup plan as described in your June 26, 2008, submittal is acceptable to EPA. Please see our enclosed approval.

In order to complete our review of your June 26, 208 PCB Electrical Equipment/Transformer inventory the EPA requests that you provide QA/QC data for the PCB concentrations cited in your June 26, 2008, PCB Electrical Equipment/Transformer Inventory.

The Chilkoot Lumber Company is responsible for complying with requirements of other federal laws and applicable requirements under the Alaska Administrative Code (AAC). If you have any questions, please contact Mr. Daniel Duncan, Regional PCB Program Coordinator, at (206) 553-6693, or by e-mail duncan.daniel@epa.gov. If you have any questions on PCB sampling methods, please contact Mr. Don Matheny, Quality Assurance Team, Office of Environmental Assessment at (206) 553-2599, or any questions on PCB analytical methods, please contact Mr. Steve Reimer, at the EPA Manchester Laboratory at (360) 871-8718.

Sincerely,

Scott E. Downey, Manager
Pesticides and Toxics Unit

Encl: as

cc: Mr. Bruce Wanstall- ADEC: Contaminated Sites

Chilkoot Lumber Company – Haines, Alaska: PCB Cleanup Workplan Approval PCB Electrical Equipment & Transformer Inventory Review: June 2008.

As stated in your plan, the Chilkoot Lumber Company and Chilkat Environmental LLC., have agreed to perform the following actions:

1. The Chilkoot Lumber Company Chilkat Environmental LLC will complete the following by August 31, 2008:

a. The complete characterization of the Chilkoot Lumber Company Site located in Haines, Alaska in accordance with 40 CFR Part 761, Subpart N: Site Characterization Sampling for PCB remediation Waste under 40 CFR § 761.61(a)(2).

b. The removal of all PCB waste from the Chilkoot Lumber Company Site located in Haines, Alaska to 25ppm PCBs or to a more stringent concentration of PCBs as require by the Alaska Department of Environmental Conservation (ADEC). This is too include all areas where PCB articles, PCB contaminated electrical equipment, PCB hydraulic equipment, PCB used oil, as well as PCB transformers have been stored at the Chilkoot Lumber Company Site in Haines, Alaska.

c. The removal of all PCB waste to less than 25 ppm PCBs in accordance with 40 CFR § 761.61(a)(4)(i)(B)(*1*) or to a more stringent PCB concentration as required by ADEC.

d. The sampling of the PCB contaminated electrical equipment, hydraulic equipment, equipment containing used oil, transformers, as well as waste from the Chilkoot Lumber Company located in Haines, Alaska prior to storage under 40 CFR § 761.65(c)(9). Sampling of PCB contaminated electrical equipment, transformers, as well as waste in accordance with 40 CFR §§ 761.61(a)(6)(i)-(ii).

e. The disposal of used oil containing PCBs $\geq$ 2 ppm and $\leq$ 49 ppm in accordance with 40 CFR§ 761.20(e). The submission of required documentation for this used oil to EPA.

f. The disposal/incineration of all PCB remediation waste, from the Chilkoot Lumber Company located in Haines, Alaska, with a PCB concentration of < 50 ppm in accordance with 40 CFR § 761.61(a)(2)(i) and 40 CFR § 761.61(a)(5)(v)(A), in a state regulated municipal waste landfill, a RCRA Subtitle C landfill, a non-hazardous non-municipal waste landfill subject to the requirements of 40 CFR § 257.5 through 257.30, or in a chemical waste landfill or at an incinerator approved by the EPA to accept PCB waste subject to the Toxic Substances Control Act (TSCA).

g. The disposal/incineration of all PCB remediation waste, from the Chilkoot Lumber Company Site located in Haines, Alaska, with a PCB concentration of $\geq$ 50 ppm in accordance with 40 CFR § 761.61(a)(2)(ii), in a state regulated hazardous waste landfill permitted by EPA under section 3004 of RCRA, or permitted by a state under section 3006 of RCRA, or in a chemical waste landfill or at an incinerator approved by the EPA to accept PCB waste subject to the Toxic Substances Control Act (TSCA).

h. The disposal/incineration of all PCB bulk product waste from the Chilkoot Lumber Company Site located in Haines, Alaska in accordance with 40 CFR §§ 761.62(a)(1) - (7).

i. The disposal of PCB hydraulic machines in accordance with 40 CFR § 761.60(b)(3).

j. The removal of PCB contaminated articles which is sent for scrap metal recovery ovens or smelter in accordance with 40 CFR § 761.72. Removal of PCB containing liquids in accordance with 40 CFR §§ 761.50(a)-(e).

k. Provide copies of Certificates of Disposal for the disposal of the PCB wastes.

l. Provide copies of Certificates of Destruction for the incineration of the PCB wastes.

m. The identification on all appropriate facility drawings from the Chilkoot Lumber Company Site located in Haines, Alaska of the existence of TSCA regulated PCB waste and contamination, if any, that is left in place at the Chilkoot Lumber Company Site located in Haines, Alaska. This identification should indicate the need for additional precautions during future modification, renovation, or demolition of the facility.

n. Perform the required PCB verification sampling in accordance with 40 CFR §§ 761.61(a)(6)(i)-(ii).

o. Perform the required PCB verification sampling analysis using PCB Methods 3500B/3540C or Method 3500B/3550B and the chemical analyses by EPA Method 8082 in accordance with 40 CFR § 761.61(a)(5)(iv) and 40 CFR § 761.292 (Subpart O).

p. Dispose of PCBs in high efficiency boilers as required in accordance with 40 CFR§ 761.50(d)(2) and 40 CFR§ 761.71.

q. Dispose of metal surfaces that have been in contact with PCBs(e.g. painted metal) through the use of thermal decontamination in accordance with 40 CFR §§ 761.50(b)(4)(ii) and 761.79(c)(6)(See 40 CFR§ 761.62(a)(6).

r. Retain the records required under 40 CFR §§ 761.125(e)(5)(i)-(iv) and 40 CFR §§ 761.61(a)(3) - (a)(5).

s. Store PCB remediation waste if required, at the clean-up site or site of generation for up to 180 days in accordance with 40 CFR §§ 761.65(c)(9)(i-iii). Store the PCB contaminated electrical equipment, PCB containing hydraulic equipment, and transformers for disposal in accordance with 40 CFR § 761.65 and 40 CFR § 761.50(c).

t. Remove the PCB remediation waste from all temporary storage areas have been in storage under 40 CFR §§ 761.65(c)(9)(i)-(iii).

u. Prepare and provide a copy of storage records as required by 40 CFR § 761.180.

2. Chilkoot Lumber Company and Chilkat Environmental LLC., will provide to EPA Region 10 and ADEC a final report documenting the completion of the above items. This report will be provided no later October 15, 2008, for the removal of all PCB articles, PCB contaminated electrical equipment, PCB containing hydraulic equipment, PCB Transformers, all PCB used oil ($\geq$ 2ppm and $\leq$ 49 ppm PCBs), as well as completion of PCB remediation. This report will also include:

   a. The results of the removal of all PCBs to less than 25 ppm PCBs or to a more stringent level of PCBs are required by the ADEC under the AAC.

   b. The results of the testing and QA/QC data for all PCBs at the Chilkoot Lumber Company Site located in Haines, Alaska.

   c. Information on additional pre- and post-cleanup sampling as well as the estimated cost of the cleanup by man-hours and dollars in accordance with 40 CFR §§ 761.61(a)(6)(i)-(ii) and 40 CFR § 761.61(a)(9) and 40 CFR §§ 761.125(c)(5)(i-ix). Although not required for compliance with the PCB Spill Cleanup Policy at 40 CFR § 761.125 (c)(5), this information should also be maintained by the Alaska Department of Environmental Conservation (ADEC) and Chlikat Environmental LLC.

If you have any questions on PCB sampling methods, please contact Mr. Don Matheny, Quality Assurance Team, Office of Environmental Assessment at (206) 553-2599 or Mr. Steve Reimer of our Manchester Laboratory at (360) 87-871X.

Sincerely,

Scott E. Downey, Manager
Pesticides and Toxics Unit

Encls: as

cc: Mr. Bruce Wanstall- ADEC Contaminated Sites

L:\Pesticides and Toxics\Dan Duncan\Chilkoot Lumber Haines Alaska Remediation Approval June 2008.doc

CONCURRENCES			
Initials:			
Name:	Daniel Duncan	Scott Downey	Cliff Villa (ORC)
Date:			

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

8 JUL 2008

Reply To: OCE-084

Mr. Ed Laperyi, President
Chilkoot Lumber Company
P.O. Box 1496
Haines, Alaska 99827

Mr. Elijah Donat, MS PHP
Chilkat Environmental LLC.
P.O. Box 865
Haines, Alaska 99827

Re: PCB Remediation Approval/Inventory Review

Dear Messrs. Laperyi and Donat:

The Environmental Protection Agency, Region 10 (EPA) has reviewed your June 26, 2008, Polychlorinated Bi-Phenyl (PCB) Electrical Equipment and Transformer Inventory and Remediation Cleanup Workplan for sampling, cleanup, and removal of PCB contamination which resulted from releases of Toxic Substances Control Act (TSCA) regulated PCBs at the Chilkoot Lumber Company Site located in Haines, Alaska. Your proposed PCB Cleanup plan as described in your June 26, 2008, submittal is acceptable to EPA. Please see our enclosed approval.

In order to complete our review of your June 26, 2008 PCB Electrical Equipment/ Transformer inventory the EPA requests that you provide QA/QC data for the PCB concentrations cited in your PCB Electrical Equipment/Transformer Inventory.

The Chilkoot Lumber Company is responsible for complying with requirements of other federal laws and applicable requirements under the Alaska Administrative Code (AAC). If you have any questions, please contact Mr. Daniel Duncan, Regional PCB Program Coordinator, at (206) 553-6693, or by e-mail duncan.daniel@epa.gov. If you have any questions on PCB sampling methods, please contact Mr. Don Matheny, Quality Assurance Team, Office of Environmental Assessment, at (206) 553-2599, or any questions on PCB analytical methods, please contact Mr. Steve Reimer at the EPA Manchester Laboratory at (360) 871-8718.

Sincerely,

Scott E Downey

Scott E. Downey, Manager
Pesticides and Toxics Unit

Enclosure

cc: Bruce Wanstall, ADEC

Chilkoot Lumber Company – Haines, Alaska: PCB Cleanup Workplan Approval PCB Electrical Equipment & Transformer Inventory Review: June 2008.

1. Consistent with your plan, the Chilkoot Lumber Company and Chilkat Environmental LLC will complete the following by **August 31, 2008**:

a. The complete characterization of the Chilkoot Lumber Company Site located in Haines, Alaska in accordance with 40 CFR Part 761, Subpart N: Site Characterization Sampling for PCB remediation Waste under 40 CFR § 761.61(a)(2).

b. The removal of all PCB waste from the Chilkoot Lumber Company Site located in Haines, Alaska to 25ppm PCBs or to a more stringent concentration of PCBs as required by the Alaska Department of Environmental Conservation (ADEC). This shall include all areas where PCB articles, PCB contaminated electrical equipment, PCB hydraulic equipment, PCB used oil, as well as PCB transformers have been stored at the Chilkoot Lumber Company Site in Haines, Alaska.

c. The removal of all PCB waste to less than 25 ppm PCBs in accordance with 40 CFR § 761.61(a)(4)(i)(B)(*1*) or to a more stringent PCB concentration as required by ADEC.

d. The sampling of the PCB contaminated electrical equipment, hydraulic equipment, equipment containing used oil, transformers, as well as waste from the Chilkoot Lumber Company located in Haines, Alaska prior to storage under 40 CFR § 761.65(c)(9). Sampling of PCB contaminated electrical equipment, transformers, as well as waste in accordance with 40 CFR §§ 761.61(a)(6)(i)-(ii).

e. The disposal of used oil containing PCBs $\geq$ 2 ppm and $\leq$ 49 ppm in accordance with 40 CFR§ 761.20(e). The submission of required documentation for this used oil to EPA.

f. The disposal/incineration of all PCB remediation waste, from the Chilkoot Lumber Company located in Haines, Alaska, with a PCB concentration of < 50 ppm in accordance with 40 CFR § 761.61(a)(2)(i) and 40 CFR § 761.61(a)(5)(v)(A), in a state regulated municipal waste landfill, a RCRA Subtitle C landfill, a non-hazardous non-municipal waste landfill subject to the requirements of 40 CFR § 257.5 through 257.30, or in a chemical waste landfill or at an incinerator approved by the EPA to accept PCB waste subject to the Toxic Substances Control Act (TSCA).

g. The disposal/incineration of all PCB remediation waste, from the Chilkoot Lumber Company Site located in Haines, Alaska, with a PCB concentration of $\geq$ 50 ppm in accordance with 40 CFR § 761.61(a)(2)(ii), in a state

regulated hazardous waste landfill permitted by EPA under section 3004 of RCRA, or permitted by a state under section 3006 of RCRA, or in a chemical waste landfill or at an incinerator approved by the EPA to accept PCB waste subject to the Toxic Substances Control Act (TSCA).

h. The disposal/incineration of all PCB bulk product waste from the Chilkoot Lumber Company Site located in Haines, Alaska in accordance with 40 CFR §§ 761.62(a)(1) - (7).

i. The disposal of PCB hydraulic machines in accordance with 40 CFR § 761.60(b)(3).

j. The removal of PCB contaminated articles which is sent for scrap metal recovery ovens or smelter in accordance with 40 CFR § 761.72. Removal of PCB containing liquids in accordance with 40 CFR §§ 761.50(a)-(e).

k. Provide copies of Certificates of Disposal for the disposal of the PCB wastes.

l. Provide copies of Certificates of Destruction for the incineration of the PCB wastes.

m. The identification on all appropriate facility drawings from the Chilkoot Lumber Company Site located in Haines, Alaska of the existence of TSCA regulated PCB waste and contamination, if any, that is left in place at the Chilkoot Lumber Company Site located in Haines, Alaska. This identification should indicate the need for additional precautions during future modification, renovation, or demolition of the facility.

n. Perform the required PCB verification sampling in accordance with 40 CFR §§ 761.61(a)(6)(i)-(ii).

o. Perform the required PCB verification sampling analysis using PCB Methods 3500B/3540C or Method 3500B/3550B and the chemical analyses by EPA Method 8082 in accordance with 40 CFR § 761.61(a)(5)(iv) and 40 CFR § 761.292 (Subpart O).

p. Dispose of PCBs in high efficiency boilers as required in accordance with 40 CFR§ 761.50(d)(2) and 40 CFR§ 761.71.

q. Dispose of metal surfaces that have been in contact with PCBs(e.g. painted metal) through the use of thermal decontamination in accordance with 40 CFR §§ 761.50(b)(4)(ii) and 761.79(c)(6)(See 40 CFR§ 761.62(a)(6).

r. Retain the records required under 40 CFR §§ 761.125(e)(5)(i)-(iv) and 40 CFR §§ 761.61(a)(3) - (a)(5).

s. Store PCB remediation waste if required, at the clean-up site or site of generation for up to 180 days in accordance with 40 CFR §§ 761.65(c)(9)(i-iii). Store the PCB contaminated electrical equipment, PCB containing hydraulic equipment, and transformers for disposal in accordance with 40 CFR § 761.65 and 40 CFR § 761.50(c).

t. Remove the PCB remediation waste from all temporary storage areas have been in storage under 40 CFR §§ 761.65(c)(9)(i)-(iii).

u. Prepare and provide a copy of storage records as required by 40 CFR § 761.180.

2. In addition to the above, Chilkoot Lumber Company and Chilkat Environmental LLC will provide to EPA Region 10 and ADEC a final report documenting the completion of the above items. This report will be provided no later **October 15, 2008**, for the removal of all PCB articles, PCB contaminated electrical equipment, PCB containing hydraulic equipment, PCB Transformers, all PCB used oil ($\geq$ 2ppm and $\leq$ 49 ppm PCBs), as well as completion of PCB remediation. This report will also include:

   a. The results of the removal of all PCBs to less than 25 ppm PCBs or to a more stringent level of PCBs are required by the ADEC under the AAC.

   b. The results of the testing and QA/QC data for all PCBs at the Chilkoot Lumber Company Site located in Haines, Alaska.

   c. Information on additional pre- and post-cleanup sampling as well as the estimated cost of the cleanup by man-hours and dollars in accordance with 40 CFR §§ 761.61(a)(6)(i)-(ii) and 40 CFR § 761.61(a)(9) and 40 CFR §§ 761.125(c)(5)(i-ix). Although not required for compliance with the PCB Spill Cleanup Policy at 40 CFR § 761.125 (c)(5), this information should also be maintained by the Alaska Department of Environmental Conservation (ADEC) and Chlikat Environmental LLC.

Attachment E:
TSCA Waste Generator Identification Number

ELIJAH DONAT
PO BOX 1469
HAINES ALASKA
UNITED STATES 99827

June 25, 2008

Subject: Notification of PCB Activity

Thank you for filing the Notification of PCB Activity form for the facility

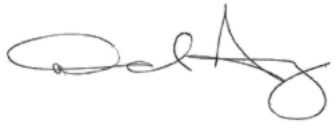
Received: June 25 2008
TSCA ID Number: AKW000202895
Handler Name: CHILKOOT LUMBER CO INC
Location Address: 5 MILE LUTAK HWY
HAINES ALASKA
UNITED STATES 99827

The Corrective Action Programs Branch (CAPB) of EPA's Office of Solid Waste is issuing the above TSCA identification number to the listed facility. This number may only be used for PCB-related activities and may not be used for any other regulated hazardous waste activities.

If you have also applied for a Regulated (Hazardous) Waste EPA ID number under RCRA, you may request a consolidation of your RCRA identification number and TSCA identification number upon receipt of your RCRA EPA ID number. To do so, CAPB would require confirmation of the RCRA identification number that has been assigned to you facility. A copy of the RCRA ID Assignment Form (8700-12A(6-90)) for your facility would be an example of acceptable documentation.

If you have any questions regarding the PCB waste handlers database, please contact Molly Finn at (703) 347-8785.

Sincerely,



Dave Hockey, Chief
Corrective Action Programs Branch

Attachment F:
PCB Equipment Registration

USEPA | United States **Environmental Protection Agency** Washington, DC 20460 | Form Approved OMB No. 2070-0112

PCB TRANSFORMER REGISTRATION

Return To:
Fibers & Organics Branch (7404T)
Office of Pollution Prevention & Toxics
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., N.W.
Washington, DC 20460-0001

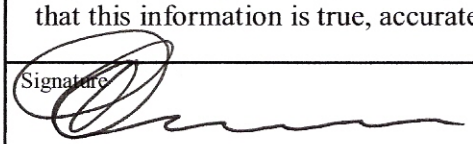
For Official Use Only

1. Company Name	Address	Contact Name & Phone #
Chilkoot Lbr. Co. Inc	P.O. Box 1469 Haines, AK. 99827	Ed Lapeyri 907-766-3111 ext 228

2. a. Location of PCB Transformer(s) - Location #1	2. a. Location of PCB Transformer(s) - Location #2
Chilkoot Lumber Company Lutak Rd. Haines, AK. 99827	
b. No. of Transformers and wt. (kg): 6 and 756kg	b. No. of Transformers and wt. (kg):
c. Any transformers containing flammable dielectric fluid: **Yes** or (**No**)	c. Any transformers containing flammable dielectric fluid: **Yes** or **No**
2. a. Location of PCB Transformer(s) - Location #3	**2. a. Location of PCB Transformer(s) - Location #4**
b. No. of Transformers and wt. (kg):	b. No. of Transformers and wt. (kg):
c. Any transformers containing flammable dielectric fluid: **Yes** or **No**	c. Any transformers containing flammable dielectric fluid: **Yes** or **No**

7. Certification

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate, and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as a company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.

Signature	Name and Official Title (Type of Print)	Date Signed
	President Ed Lapeyri	7-18-08

Paperwork Reduction Act Notice

The annual public reporting burden for this collection of information is estimated to average 0.57 hours per response. This estimate includes time for reading instructions, searching existing data sources, gathering and maintaining the needed data, and completing and reviewing collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, Collections Strategy Division, U.S. Environmental Protection Agency (mail code 2822), 1200 Pennsylvania Ave., N.W., Washington, D.C. 20460-0001. Include the OMB number identified above in any correspondence. Do not send the completed form to this address. The actual information or form should be submitted in accordance with the instructions accompanying the form, or as specified in the corresponding regulations.

Attachment G:
Jaco Analytical Report 10.31.97

Jaco Analytical Laboratory

James A. Bennett, President
1-800-521-0539

Fax Transmittal

To: Larry	**From:** Tina
Fax: 907-766-3332	**Pages:** 2
Phone:	**Date:** 7/1/2008
Re:	**CC:**

☐ **Urgent** ☐ **For Review** ☐ **Please Comment** ☐ **Please Reply** ☐ **Please Recycle**

• **Comments:**

JACO Analytical Batch QC Report

7/1/2008

JACO ANALYTICAL LABORATORY

QA/QC REPORT

Chilkoot Lumber Company
P.O. Box 1469
Haines, AK 99827
Attn: Larry Beck

Samples received Oct. 31, 1997
Report # : E7103104
Sample #'s 501 - 529

Laboratory Standard Upper Control Limit		**47.5 ppm**	**115%**
Lab Control Standard 1a	50ppm / 1254	**55.3**	110.6%
Lab Control Standard 1b	50ppm / 1260	**49.2**	98.4%
Lab Control Standard 2a	50ppm / 1242	**46.4**	92.8%
Lab Control Standard 2b	50ppm / 1260	**50.5**	101.0%
Laboratory Standard Lower Control Limit		**42.5 ppm**	**85%**

Sample #	**OE7103848** Spiked with 20ppm standard	
Spike	**30.60**	**27.10**
Sample	**10.20**	**9.60**
QC #		1
Analyst		Glenda Nelson

JACO ANALYTICAL, Inc. PCB TEST REPORT 11/04/97

924
CHILKOOT LUMBER COMPANY
P.O. BOX 1469
HAINES, AK 99827
Attn: LARRY BECK

JACO ANALYTICAL, Inc.
103 12th Ave SW
EPHRATA, WA 98823
Glenda Nelson, Chemist

Lab Report #: E7103104

Below is a listing of the samples received on 10/31/97 together with the laboratory results on their respective PCB content. Please contact the lab at 509-754-5725 if you have any questions regarding these sample results.

UTILITY SERIAL NO.	COMPANY #	MISC.	AROCLOR	PPM	JAL #
	501		1260	9	OE7104496
	502		1260	12	OE7104499
	503	PCL	1242/54/60	63	OE7104500
	504		1260	18	OE7104501
	505		1260	28	OE7104502
	506		1260	6	OE7104503
	507			ND	OE7104504
	508			ND	OE7104505
	509			ND	OE7104506
	510			ND	OE7104507
	511			ND	OE7104508
	512			ND	OE7104509
	513		1242/60	9	OE7104510
	514		1260	1	OE7104511
	515			ND	OE7104512
	516		1260	53 SC	OE7104513
	517			ND	OE7104514
	518		1260	591 SC	OE7104515
	519		1260	612	OE7104516
	520		1254/60	150	OE7104517

 Glenda Nelson

JACO ANALYTICAL, Inc. PCB TEST REPORT 11/04/97

UTILITY SERIAL NO.	COMPANY #	MISC.	AROCLOR	PPM	JAL #
	521		1262	2	OE710451
	522		1262	1	OE710451
	523			ND	OE710452
	524			ND	OE7104521
	525			ND	OE7104522
	526		1260	4	OE710452
	527		1260	261	OE7 04524
	528		1260	8	OE7104525
	529		1254/60	218	OE7104526

Lab Report #:E7103104 Page 2 Number of samples: 29

Glenda Nelson

JAKO ANALYTICAL LAB

PACKING LIST

NATIONAL CHEM LAB
PH. 509-754-5725
103 12TH AVE., SW.
EPHRATA, WA 98823

☐ PACKING LIST

49

SHIP TO: Larry Beck 907-766-3111
Chilkoot Lumber Co.
PO Box 1469
Haines, AK 99827

BILL TO: Same

PURCHASE ORDER NO.	DATE SHIPPED	SHIPPED VIA	NCL NO.	SALESPERSON
		USPS		

✓	QUANTITY SHIPPED	QUANTITY BACK ORDERED	ITEM NO.	DESCRIPTION
	30		JAL201	Sampling Kit

Samples - $40.00 5 day turnaround -

" Thank You "

CARTONS	TOTAL WEIGHT	ORDER COMPLETE	BALANCE TO FOLLOW	PACKED BY	CHECKED BY

RECEIVED IN GOOD ORDER BY:
X

PLEASE NOTIFY US IMMEDIATELY
IF ERROR IS FOUND IN SHIPMENT

ITEM	ORDER	SHIP	DESCRIPTION	PRICE	AMOUNT

PAID
CHECK NO. 4179
AMOUNT
DATE 11-11-97

JACO ANALYTICAL INC

PCB Tests

Attachment H:
Test America Report 7.9.08

TestAmerica
THE LEADER IN ENVIRONMENTAL TESTING

SEATTLE, WA 11720 NORTH CREEK PKWY N, SUITE 400
BOTHELL, WA 98011-8244
PH: (425) 420.9200 FAX: (425) 420.9210

July 11, 2008

William Prisciandaro
Chilkat Environmental
223 Oldhart Rd
Haines, AK 99827

RE: Chilkoot Lumber Company

Enclosed are the results of analyses for samples received by the laboratory on 07/09/08 15:10. The following list is a summary of the Work Orders contained in this report, generated on 07/11/08 15:57.

If you have any questions concerning this report, please feel free to contact me.

Work Order	Project	ProjectNumber
BRG0110	Chilkoot Lumber Company	88087500

TestAmerica Seattle

Curtis D. Armstrong, Project Manager

TestAmerica
THE LEADER IN ENVIRONMENTAL TESTING

SEATTLE, WA 11720 NORTH CREEK PKWY N, SUITE 400
BOTHELL, WA 98011-8244
PH: (425) 420.9200 FAX: (425) 420.9210

Chilkat Environmental	Project Name:	**Chilkoot Lumber Company**	
223 Oldhart Rd	Project Number:	88087500	Report Created:
Haines, AK 99827	Project Manager:	William Prisciandaro	07/11/08 15:57

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
3263450	BRG0110-01	Other wet	07/01/08 14:12	07/09/08 15:10
3263054	BRG0110-02	Other wet	07/01/08 14:10	07/09/08 15:10
3263053	BRG0110-03	Other wet	07/01/08 14:06	07/09/08 15:10
7525100	BRG0110-04	Other wet	07/05/08 14:58	07/09/08 15:10

TestAmerica Seattle

Curtis D. Armstrong, Project Manager

TestAmerica
THE LEADER IN ENVIRONMENTAL TESTING

SEATTLE, WA 11720 NORTH CREEK PKWY N, SUITE 400
BOTHELL, WA 98011-8244
PH: (425) 420.9200 FAX: (425) 420.9210

Chilkat Environmental	Project Name:	**Chilkoot Lumber Company**	
223 Oldhart Rd	Project Number:	88087500	Report Created:
Haines, AK 99827	Project Manager:	William Prisciandaro	07/11/08 15:57

Polychlorinated Biphenyls in Oil by EPA Method 8082

TestAmerica Seattle

Analyte	Method	Result	MDL*	MRL	Units	Dil	Batch	Prepared	Analyzed	Notes
BRG0110-01 (3263450)		**Other wet**			**Sampled: 07/01/08 14:12**					
Aroclor 1016	EPA 8082	ND	-----	10.0	mg/kg	10x	8G09051	07/09/08 16:35	07/11/08 12:41	
Aroclor 1221	"	ND	-----	10.0	"	"	"	"	"	
Aroclor 1232	"	ND	-----	10.0	"	"	"	"	"	
Aroclor 1242	"	ND	-----	10.0	"	"	"	"	"	
Aroclor 1248	"	ND	-----	10.0	"	"	"	"	"	
Aroclor 1254	"	ND	-----	10.0	"	"	"	"	"	
Aroclor 1260	"	ND	-----	10.0	"	"	"	"	"	
Aroclor 1262	"	ND	-----	10.0	"	"	"	"	"	
Aroclor 1268	"	ND	-----	10.0	"	"	"	"	"	
Surrogate(s): *TCX*		*71.4%*			*40 - 130 %*	"			"	
Decachlorobiphenyl		*84.0%*			*40 - 130 %*	"			"	
BRG0110-02 (3263054)		**Other wet**			**Sampled: 07/01/08 14:10**					**RL1**
Aroclor 1016	EPA 8082	ND	-----	10.0	mg/kg	10x	8G09051	07/09/08 16:35	07/11/08 12:59	
Aroclor 1221	"	ND	-----	10.0	"	"	"	"	"	
Aroclor 1232	"	ND	-----	10.0	"	"	"	"	"	
Aroclor 1242	"	ND	-----	10.0	"	"	"	"	"	
Aroclor 1248	"	ND	-----	10.0	"	"	"	"	"	
Aroclor 1254	"	ND	-----	10.0	"	"	"	"	"	
Aroclor 1260	"	ND	-----	10.0	"	"	"	"	"	
Aroclor 1262	"	ND	-----	10.0	"	"	"	"	"	
Aroclor 1268	"	ND	-----	10.0	"	"	"	"	"	
Surrogate(s): *TCX*		*67.7%*			*40 - 130 %*	"			"	
Decachlorobiphenyl		*82.2%*			*40 - 130 %*	"			"	
BRG0110-03 (3263053)		**Other wet**			**Sampled: 07/01/08 14:06**					**RL1**
Aroclor 1016	EPA 8082	ND	-----	10.0	mg/kg	10x	8G09051	07/09/08 16:35	07/11/08 13:17	
Aroclor 1221	"	ND	-----	10.0	"	"	"	"	"	
Aroclor 1232	"	ND	-----	10.0	"	"	"	"	"	
Aroclor 1242	"	ND	-----	10.0	"	"	"	"	"	
Aroclor 1248	"	ND	-----	10.0	"	"	"	"	"	
Aroclor 1254	"	ND	-----	10.0	"	"	"	"	"	
Aroclor 1260	"	ND	-----	10.0	"	"	"	"	"	
Aroclor 1262	"	ND	-----	10.0	"	"	"	"	"	
Aroclor 1268	"	ND	-----	10.0	"	"	"	"	"	
Surrogate(s): *TCX*		*75.3%*			*40 - 130 %*	"			"	
Decachlorobiphenyl		*80.0%*			*40 - 130 %*	"			"	

TestAmerica Seattle

Curtis D. Armstrong, Project Manager

TestAmerica
THE LEADER IN ENVIRONMENTAL TESTING

SEATTLE, WA 11720 NORTH CREEK PKWY N, SUITE 400
BOTHELL, WA 98011-8244
PH: (425) 420.9200 FAX: (425) 420.9210

Chilkat Environmental	Project Name:	**Chilkoot Lumber Company**	
223 Oldhart Rd	Project Number:	88087500	Report Created:
Haines, AK 99827	Project Manager:	William Prisciandaro	07/11/08 15:57

Polychlorinated Biphenyls in Oil by EPA Method 8082

TestAmerica Seattle

Analyte	Method	Result	MDL*	MRL	Units	Dil	Batch	Prepared	Analyzed	Notes
BRG0110-04 (7525100)		**Other wet**			**Sampled: 07/05/08 14:58**					
Aroclor 1016	EPA 8082	ND	-----	100	mg/kg	100x	8G09051	07/09/08 16:35	07/11/08 14:06	
Aroclor 1221	"	ND	-----	100	"	"	"	"	"	
Aroclor 1232	"	ND	-----	100	"	"	"	"	"	
Aroclor 1242	"	ND	-----	100	"	"	"	"	"	
Aroclor 1248	"	ND	-----	100	"	"	"	"	"	
Aroclor 1254	"	ND	-----	100	"	"	"	"	"	
Aroclor 1260	"	**581**	-----	100	"	"	"	"	"	
Aroclor 1262	"	ND	-----	100	"	"	"	"	"	
Aroclor 1268	"	ND	-----	100	"	"	"	"	"	
Surrogate(s): TCX			*99.0%*		*40 - 130 %*	"			"	
Decachlorobiphenyl			*230%*		*40 - 130 %*	"			"	***Z3***

TestAmerica Seattle

Curtis D. Armstrong, Project Manager

TestAmerica
THE LEADER IN ENVIRONMENTAL TESTING

SEATTLE, WA 11720 NORTH CREEK PKWY N, SUITE 400
BOTHELL, WA 98011-8244
PH: (425) 420.9200 FAX: (425) 420.9210

Chilkat Environmental	Project Name:	**Chilkoot Lumber Company**	
223 Oldhart Rd	Project Number:	88087500	Report Created:
Haines, AK 99827	Project Manager:	William Prisciandaro	07/11/08 15:57

Polychlorinated Biphenyls in Oil by EPA Method 8082 - Laboratory Quality Control Results

TestAmerica Seattle

QC Batch: 8G09051 **Other wet Preparation Method: EPA 3580A**

Analyte	Method	Result	MDL*	MRL	Units	Dil	Source Result	Spike Amt	% REC	(Limits)	% RPD	(Limits)	Analyzed	Notes
Blank (8G09051-BLK1)							**Extracted: 07/09/08 16:35**							
Aroclor 1016	EPA 8082	ND	---	1.00	mg/kg	1x	--	--	--	--	--	--	07/11/08 11:48	
Aroclor 1221	"	ND	---	1.00	"	"	--	--	--	--	--	--	"	
Aroclor 1232	"	ND	---	1.00	"	"	--	--	--	--	--	--	"	
Aroclor 1242	"	ND	---	1.00	"	"	--	--	--	--	--	--	"	
Aroclor 1248	"	ND	---	1.00	"	"	--	--	--	--	--	--	"	
Aroclor 1254	"	ND	---	1.00	"	"	--	--	--	--	--	--	"	
Aroclor 1260	"	ND	---	1.00	"	"	--	--	--	--	--	--	"	
Aroclor 1262	"	ND	---	1.00	"	"	--	--	--	--	--	--	"	
Aroclor 1268	"	ND	---	1.00	"	"	--	--	--	--	--	--	"	
Surrogate(s): TCX		*Recovery: 96.1%*			*Limits: 40-130%*	"							*07/11/08 11:48*	
Decachlorobiphenyl		*81.9%*			*40-130%*	"							"	
LCS (8G09051-BS1)							**Extracted: 07/09/08 16:35**							
Aroclor 1016	EPA 8082	5.18	---	1.00	mg/kg	1x	--	5.00	104%	(30-132)	--	--	07/11/08 12:06	
Aroclor 1260	"	5.19	---	1.00	"	"	--	"	104%	"	--	--	"	
Surrogate(s): TCX		*Recovery: 102%*			*Limits: 40-130%*	"							*07/11/08 12:06*	
Decachlorobiphenyl		*85.3%*			*40-130%*	"							"	
LCS Dup (8G09051-BSD1)							**Extracted: 07/09/08 16:35**							
Aroclor 1016	EPA 8082	5.09	---	1.00	mg/kg	1x	--	5.00	102%	(30-132)	1.76%	(19)	07/11/08 12:24	
Aroclor 1260	"	5.18	---	1.00	"	"	--	"	104%	"	0.125%	"	"	
Surrogate(s): TCX		*Recovery: 102%*			*Limits: 40-130%*	"							*07/11/08 12:24*	
Decachlorobiphenyl		*88.5%*			*40-130%*	"							"	

TestAmerica Seattle

Curtis D. Armstrong, Project Manager

TestAmerica
THE LEADER IN ENVIRONMENTAL TESTING

SEATTLE, WA 11720 NORTH CREEK PKWY N, SUITE 400
BOTHELL, WA 98011-8244
PH: (425) 420.9200 FAX: (425) 420.9210

Chilkat Environmental	Project Name:	**Chilkoot Lumber Company**	
223 Oldhart Rd	Project Number:	88087500	Report Created:
Haines, AK 99827	Project Manager:	William Prisciandaro	07/11/08 15:57

Notes and Definitions

Report Specific Notes:

RL1 - Reporting limit raised due to sample matrix effects.

Z3 - The sample required a dilution due to the nature of the sample matrix. Because of this dilution, the surrogate spike concentration in the sample was reduced to a level where the recovery calculation does not provide useful information.

Laboratory Reporting Conventions:

DET - Analyte DETECTED at or above the Reporting Limit. Qualitative Analyses only.

ND - Analyte NOT DETECTED at or above the reporting limit (MDL or MRL, as appropriate).

NR/NA - Not Reported / Not Available

dry - Sample results reported on a Dry Weight Basis. Results and Reporting Limits have been corrected for Percent Dry Weight.

wet - Sample results and reporting limits reported on a Wet Weight Basis (as received). Results with neither 'wet' nor 'dry' are reported on a Wet Weight Basis.

RPD - RELATIVE PERCENT DIFFERENCE (RPDs calculated using Results, not Percent Recoveries).

MRL - METHOD REPORTING LIMIT. Reporting Level at, or above, the lowest level standard of the Calibration Table.

MDL* - METHOD DETECTION LIMIT. Reporting Level at, or above, the statistically derived limit based on 40CFR, Part 136, Appendix B. *MDLs are listed on the report only if the data has been evaluated below the MRL. Results between the MDL and MRL are reported as Estimated Results.

Dil - Dilutions are calculated based on deviations from the standard dilution performed for an analysis, and may not represent the dilution found on the analytical raw data.

Reporting Limits - Reporting limits (MDLs and MRLs) are adjusted based on variations in sample preparation amounts, analytical dilutions and percent solids, where applicable.

Electronic Signature - Electronic Signature added in accordance with TestAmerica's *Electronic Reporting and Electronic Signatures Policy.* Application of electronic signature indicates that the report has been reviewed and approved for release by the laboratory. Electronic signature is intended to be the legally binding equivalent of a traditionally handwritten signature.

TestAmerica Seattle

Curtis D. Armstrong, Project Manager

Attachment I:
Test America Report 7.16.08

TestAmerica
THE LEADER IN ENVIRONMENTAL TESTING

SEATTLE, WA 11720 NORTH CREEK PKWY N, SUITE 400
BOTHELL, WA 98011-8244
PH: (425) 420.9200 FAX: (425) 420.9210

July 16, 2008

William Prisciandaro
Chilkat Environmental
223 Oldhart Rd
Haines, AK 99827

RE: Chilkoot Lumber Company

Enclosed are the results of analyses for samples received by the laboratory on 07/14/08 17:15. The following list is a summary of the Work Orders contained in this report, generated on 07/16/08 13:34.

If you have any questions concerning this report, please feel free to contact me.

Work Order	Project	ProjectNumber
BRG0170	Chilkoot Lumber Company	88087500

TestAmerica Seattle

Curtis D. Armstrong, Project Manager

TestAmerica
THE LEADER IN ENVIRONMENTAL TESTING

SEATTLE, WA 11720 NORTH CREEK PKWY N, SUITE 400
BOTHELL, WA 98011-8244
PH: (425) 420.9200 FAX: (425) 420.9210

Chilkat Environmental	Project Name:	**Chilkoot Lumber Company**	
223 Oldhart Rd	Project Number:	88087500	Report Created:
Haines, AK 99827	Project Manager:	William Prisciandaro	07/16/08 13:34

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
Capacitor	BRG0170-01	Other wet	07/11/08 12:20	07/14/08 17:15
Car Diesel	BRG0170-02	Other wet	07/11/08 17:30	07/14/08 17:15
Oil Tank	BRG0170-03	Other wet	07/11/08 18:00	07/14/08 17:15

TestAmerica Seattle

Curtis D. Armstrong, Project Manager

TestAmerica
THE LEADER IN ENVIRONMENTAL TESTING

SEATTLE, WA 11720 NORTH CREEK PKWY N, SUITE 400
BOTHELL, WA 98011-8244
PH: (425) 420.9200 FAX: (425) 420.9210

Chilkat Environmental	Project Name:	**Chilkoot Lumber Company**	
223 Oldhart Rd	Project Number:	88087500	Report Created:
Haines, AK 99827	Project Manager:	William Prisciandaro	07/16/08 13:34

Polychlorinated Biphenyls in Oil by EPA Method 8082

TestAmerica Seattle

Analyte	Method	Result	MDL*	MRL	Units	Dil	Batch	Prepared	Analyzed	Notes
BRG0170-01 (Capacitor)		**Other wet**			**Sampled: 07/11/08 12:20**					
Aroclor 1016	EPA 8082	ND	-----	10000	mg/kg	10000x	8G14054	07/14/08 18:32	07/15/08 16:17	
Aroclor 1221	"	ND	-----	10000	"	"	"	"	"	
Aroclor 1232	"	ND	-----	10000	"	"	"	"	"	
Aroclor 1248	"	ND	-----	10000	"	"	"	"	"	
Aroclor 1254	"	ND	-----	10000	"	"	"	"	"	
Aroclor 1260	"	ND	-----	10000	"	"	"	"	"	
Aroclor 1262	"	ND	-----	10000	"	"	"	"	"	
Aroclor 1268	"	ND	-----	10000	"	"	"	"	"	
Surrogate(s): TCX			*NR*		*40 - 130 %*	"			"	***Z3***
Decachlorobiphenyl			*NR*		*40 - 130 %*	"			"	***Z3***
BRG0170-01RE1 (Capacitor)		**Other wet**			**Sampled: 07/11/08 12:20**					
Aroclor 1242	EPA 8082	**1590000**	-----	500000	mg/kg	500000x	8G14054	07/14/08 18:32	07/15/08 17:04	**A-01**
Surrogate(s): TCX			*NR*		*40 - 130 %*	"			"	***Z3***
Decachlorobiphenyl			*NR*		*40 - 130 %*	"			"	***Z3***
BRG0170-02 (Car Diesel)		**Other wet**			**Sampled: 07/11/08 17:30**					**RL1**
Aroclor 1016	EPA 8082	ND	-----	100	mg/kg	100x	8G14054	07/14/08 18:32	07/15/08 15:42	
Aroclor 1221	"	ND	-----	100	"	"	"	"	"	
Aroclor 1232	"	ND	-----	100	"	"	"	"	"	
Aroclor 1242	"	ND	-----	100	"	"	"	"	"	
Aroclor 1248	"	ND	-----	100	"	"	"	"	"	
Aroclor 1254	"	ND	-----	100	"	"	"	"	"	
Aroclor 1260	"	ND	-----	100	"	"	"	"	"	
Aroclor 1262	"	ND	-----	100	"	"	"	"	"	
Aroclor 1268	"	ND	-----	100	"	"	"	"	"	
Surrogate(s): TCX			*136%*		*40 - 130 %*	"			"	***Z3***
Decachlorobiphenyl			*108%*		*40 - 130 %*	"			"	
BRG0170-03 (Oil Tank)		**Other wet**			**Sampled: 07/11/08 18:00**					**RL1**
Aroclor 1016	EPA 8082	ND	-----	100	mg/kg	100x	8G14054	07/14/08 18:32	07/15/08 15:59	
Aroclor 1221	"	ND	-----	100	"	"	"	"	"	
Aroclor 1232	"	ND	-----	100	"	"	"	"	"	
Aroclor 1242	"	ND	-----	100	"	"	"	"	"	
Aroclor 1248	"	ND	-----	100	"	"	"	"	"	
Aroclor 1254	"	ND	-----	100	"	"	"	"	"	
Aroclor 1260	"	ND	-----	100	"	"	"	"	"	
Aroclor 1262	"	ND	-----	100	"	"	"	"	"	
Aroclor 1268	"	ND	-----	100	"	"	"	"	"	
Surrogate(s): TCX			*119%*		*40 - 130 %*	"			"	

TestAmerica Seattle

Curtis D. Armstrong, Project Manager

TestAmerica
THE LEADER IN ENVIRONMENTAL TESTING

SEATTLE, WA 11720 NORTH CREEK PKWY N, SUITE 400
BOTHELL, WA 98011-8244
PH: (425) 420.9200 FAX: (425) 420.9210

Chilkat Environmental	Project Name:	**Chilkoot Lumber Company**	
223 Oldhart Rd	Project Number:	88087500	Report Created:
Haines, AK 99827	Project Manager:	William Prisciandaro	07/16/08 13:34

Polychlorinated Biphenyls in Oil by EPA Method 8082

TestAmerica Seattle

Analyte	Method	Result	MDL*	MRL	Units	Dil	Batch	Prepared	Analyzed	Notes
BRG0170-03 (Oil Tank)		**Other wet**			**Sampled: 07/11/08 18:00**					**RL1**
Decachlorobiphenyl		*110%*			*40 - 130 %*	*100x*			*07/15/08 15:59*	

TestAmerica Seattle

Curtis D. Armstrong, Project Manager

TestAmerica
THE LEADER IN ENVIRONMENTAL TESTING

SEATTLE, WA 11720 NORTH CREEK PKWY N, SUITE 400
BOTHELL, WA 98011-8244
PH: (425) 420.9200 FAX: (425) 420.9210

Chilkat Environmental	Project Name:	**Chilkoot Lumber Company**	
223 Oldhart Rd	Project Number:	88087500	Report Created:
Haines, AK 99827	Project Manager:	William Prisciandaro	07/16/08 13:34

Polychlorinated Biphenyls in Oil by EPA Method 8082 - Laboratory Quality Control Results

TestAmerica Seattle

QC Batch: 8G14054 **Other wet Preparation Method: EPA 3580A**

Analyte	Method	Result	MDL*	MRL	Units	Dil	Source Result	Spike Amt	% REC	(Limits)	% RPD	(Limits)	Analyzed	Notes
Blank (8G14054-BLK1)							**Extracted: 07/14/08 18:32**							
Aroclor 1016	EPA 8082	ND	---	1.00	mg/kg	1x	--	--	--	--	--	--	07/15/08 10:41	
Aroclor 1221	"	ND	---	1.00	"	"	--	--	--	--	--	--	"	
Aroclor 1232	"	ND	---	1.00	"	"	--	--	--	--	--	--	"	
Aroclor 1242	"	ND	---	1.00	"	"	--	--	--	--	--	--	"	
Aroclor 1248	"	ND	---	1.00	"	"	--	--	--	--	--	--	"	
Aroclor 1254	"	ND	---	1.00	"	"	--	--	--	--	--	--	"	
Aroclor 1260	"	ND	---	1.00	"	"	--	--	--	--	--	--	"	
Aroclor 1262	"	ND	---	1.00	"	"	--	--	--	--	--	--	"	
Aroclor 1268	"	ND	---	1.00	"	"	--	--	--	--	--	--	"	
Surrogate(s): TCX		*Recovery: 91.0%*			*Limits: 40-130%*	"							*07/15/08 10:41*	
Decachlorobiphenyl		*82.8%*			*40-130%*	"							"	
LCS (8G14054-BS1)							**Extracted: 07/14/08 18:32**							
Aroclor 1016	EPA 8082	4.78	---	1.00	mg/kg	1x	--	5.00	95.5%	(30-132)	--	--	07/15/08 17:22	
Aroclor 1260	"	4.74	---	1.00	"	"	--	"	94.7%	"	--	--	"	
Surrogate(s): TCX		*Recovery: 103%*			*Limits: 40-130%*	"							*07/15/08 17:22*	
Decachlorobiphenyl		*86.6%*			*40-130%*	"							"	
LCS Dup (8G14054-BSD1)							**Extracted: 07/14/08 18:32**							
Aroclor 1016	EPA 8082	4.96	---	1.00	mg/kg	1x	--	5.00	99.1%	(30-132)	3.70%	(19)	07/15/08 17:40	
Aroclor 1260	"	4.99	---	1.00	"	"	--	"	99.7%	"	5.17%	"	"	
Surrogate(s): TCX		*Recovery: 103%*			*Limits: 40-130%*	"							*07/15/08 17:40*	
Decachlorobiphenyl		*90.7%*			*40-130%*	"							"	

TestAmerica Seattle

Curtis D. Armstrong, Project Manager

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BOTHELL, WA 98011-8244
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Chilkat Environmental	Project Name:	**Chilkoot Lumber Company**	
223 Oldhart Rd	Project Number:	88087500	Report Created:
Haines, AK 99827	Project Manager:	William Prisciandaro	07/16/08 13:34

Notes and Definitions

Report Specific Notes:

A-01	-	Due to extreme level of dilution required sample results should be considered an estimate.
RL1	-	Reporting limit raised due to sample matrix effects.
Z3	-	The sample required a dilution due to the nature of the sample matrix. Because of this dilution, the surrogate spike concentration in the sample was reduced to a level where the recovery calculation does not provide useful information.

Laboratory Reporting Conventions:

DET	-	Analyte DETECTED at or above the Reporting Limit. Qualitative Analyses only.
ND	-	Analyte NOT DETECTED at or above the reporting limit (MDL or MRL, as appropriate).
NR/NA	-	Not Reported / Not Available
dry	-	Sample results reported on a Dry Weight Basis. Results and Reporting Limits have been corrected for Percent Dry Weight.
wet	-	Sample results and reporting limits reported on a Wet Weight Basis (as received). Results with neither 'wet' nor 'dry' are reported on a Wet Weight Basis.
RPD	-	RELATIVE PERCENT DIFFERENCE (RPDs calculated using Results, not Percent Recoveries).
MRL	-	METHOD REPORTING LIMIT. Reporting Level at, or above, the lowest level standard of the Calibration Table.
MDL*	-	METHOD DETECTION LIMIT. Reporting Level at, or above, the statistically derived limit based on 40CFR, Part 136, Appendix B. *MDLs are listed on the report only if the data has been evaluated below the MRL. Results between the MDL and MRL are reported as Estimated Results.
Dil	-	Dilutions are calculated based on deviations from the standard dilution performed for an analysis, and may not represent the dilution found on the analytical raw data.
Reporting Limits	-	Reporting limits (MDLs and MRLs) are adjusted based on variations in sample preparation amounts, analytical dilutions and percent solids, where applicable.
Electronic Signature	-	Electronic Signature added in accordance with TestAmerica's *Electronic Reporting and Electronic Signatures Policy.* Application of electronic signature indicates that the report has been reviewed and approved for release by the laboratory. Electronic signature is intended to be the legally binding equivalent of a traditionally handwritten signature.

TestAmerica Seattle

Curtis D. Armstrong, Project Manager

Seattle
11720 North Creek Parkway N
Suite 400
Bothell, WA 98011
phone 425.420.9200 fax 425.420.9210

Chain of Custody Record

TestAmerica
THE LEADER IN ENVIRONMENTAL TESTING

TestAmerica Laboratories, Inc.

Client Contact	Project Manager: William Priscandaro	Site Contact:	Date: 7/11/08	COC No:
Your Company Name here: Chilkat Environmental	Tel/Fax: 907 766 3897	Lab Contact:	Carrier:	1 of 1 COCs
Address: PO Box 865	Analysis Turnaround Time			Job No.: BRG0170
City/State/Zip: Haines AK 99827	Calendar (C) or Work Days (W): C			
(xxx) xxx-xxxx Phone: 907 766 3897	TAT if different from Below			SDG No.
(xxx) xxx-xxxx FAX: 530 466 3102	☐ 2 weeks			
Project Name: Chilkoot Lumber Company	☐ 1 week			
Site:	☐ 2 days			
PO#	☒ 1 day			

Sample Identification	Sample Date	Sample Time	Sample Type	Matrix	# of Cont.		Sample Specific Notes:	
Capacitor	7/11/08	12:20pm		Oil	1	SW 846 Method 8082	Oil Composite	01
Car Diesel	7/11/08	5:30pm		Oil	1	SW 846 Method 8082	Diesel Composite	02
Oil Tank	7/11/08	6:00pm		Oil	1	SW 846 Method 8082	Oil Composite	03

Preservation Used: 1= Ice, 2= HCl; 3= H2SO4; 4=HNO3; 5=NaOH; 6= Other _____

Possible Hazard Identification
☐ Non-Hazard ☐ Flammable ☐ Skin Irritant Poison B ☐ Unknown ☐

Sample Disposal (A fee may be assessed if samples are retained longer than 1 month)
☐ Return To Client ☒ Disposal By Lab ☐ Archive For _____ Months

Special Instructions/QC Requirements & Comments: Please have 1 day turnaround and provide all QA/QC Data!
Email results to williamp@chilkatenvironmental.com

Relinquished by:	Company:	Date/Time:	Received by:	Company:	Date/Time:
William Priscandaro	Chilkat Environmental	7/11/08 6:15pm	28.8°C w/cs	TA-SEA	7/14/08 1715
Relinquished by:	Company:	Date/Time:	Received by:	Company:	Date/Time:
Relinquished by:	Company:	Date/Time:	Received by:	Company:	Date/Time:

TAT: _____ Paperwork to PM – Date:_____ Time:_____ Non-Conformances?

Page Time & Initials:_____ Circle (Y) or N

(If Y, see other side)

TEST AMERICA SAMPLE RECEIPT CHECKLIST

Received By: (applies to temp at receipt)
Date: 7/14/08
Time: 1715
Initials: F.L.

Logged-in By:
Date: 7/14/08
Time: 1812
Initials: BO

Unpacked/Labeled By:
Date: 7/14/08
Time: 1820
Initials: BO

Cooler ID: 346

Work Order No. BRG0170
Client: _____
Project: _____

Container Type:
X Cooler
____ Box
____ None/Other _____

COC Seals:
X Ship Container
____ On Bottles
____ None
William Priscilla Sign By
7/11/08 Date

Packing Material:
X Bubble Bags ____ Styrofoam
____ Foam Packs
X None/Other Newspaper

Refrigerant:
____ Gel Ice Pack _____
____ Loose Ice _____
X None/Other _____

Received Via: Bill#
____ Fed Ex ____ Client
____ UPS X TA Courier
____ DHL ____ Mid Valley
____ Senvoy ____ TDP
X GS ____ Other_____

Cooler Temperature (*IR*): 28.8 °C Plastic Glass (Frozen filters, Tedlars and aqueous Metals exempt)
(circle one)

Temperature Blank? _____°C or NA

Trip Blank? Y or N or (NA)

BP, OPLC,ARCO-Temperature monitoring every 15 minutes:
(initial/date/time):_____
Comments:_____

Sample Containers:		ID			ID
Intact?	(Y) or N	_____	Metals Preserved?	Y or N or (NA)	_____
Provided by TA?	Y or (N)	_____	Client QAPP Preserved?	Y or N or (NA)	_____
Correct Type?	(Y) or N	_____	Adequate Volume? (for tests requested)	(Y) or N	_____
#Containers match COC?	(Y) or N	_____	Water VOAs: Headspace?	Y or N or (NA)	_____
IDs/time/date match COC?	(Y) or N	_____	Comments:		
Hold Times in hold?	(Y) or N	_____			

PROJECT MANAGEMENT

Is the Chain of Custody complete? Y or N If N, circle the items that were incomplete

Comments,Problems_____

_____

_____

_____

Total access set up? Y or N
Has client been contacted regarding non-conformances? Y or N If Y, ____/____ (Date Time)

PM Initials: _____ Date: _____ Time: _____

(rev 4. 01/24/07)

NOTIFICATION OF DISCREPANCY

DATE: 7/14/18	*TIME:* 1715	*PM:* C.A.	*SC INITIALS:* FL.

Rush/Short Hold? ☒ *Yes* ☐ *No*	

☐ **Project Not Set Up in ELM** ☐ **New Client** ☐ **COC Received ON HOLD**
☐ **Analysis Requested on COC – Not Listed for Project in ELM**

☐ **PM To Add Analysis:** _____
☐ **Clarification of Analysis:** _____
☐ **Hold Time Expired: (Analysis)** _____
☐ **Turnaround Time Not Checked:** _____
☐ **Did Not Receive Sample(s) Listed on COC:** _____
_____
☐ **Received Extra Sample(s) Not Listed on COC:** _____
_____
☐ **Sample Description(s) or Date/Time Sampled Do Not Match COC:**
_____
_____
_____

☐ **Improper Preservative For method:** _____
☐ **Sample Received Broken:** _____
☐ **Insufficient Sample Volume:** _____
☐ **Sample preserved upon receipt:** _____
_____
☒ **Temperature Outside recommended range (4°C±2°C):** 28.8°C
☐ **Received on-ice within 4 hours of collection, temperature between ambient to 2°C acceptable.**
☐ **Other:**
_____
_____
_____
_____

PROJECT MANAGER RESOLUTION:	(Date & Time when returned to SC)
Approval By:	**Date:** **Time:**

Attachment J:
Test America Report 7.25.08

TestAmerica
THE LEADER IN ENVIRONMENTAL TESTING

SEATTLE, WA 11720 NORTH CREEK PKWY N, SUITE 400
BOTHELL, WA 98011-8244
PH: (425) 420.9200 FAX: (425) 420.9210

July 29, 2008

William Prisciandaro
Chilkat Environmental
223 Oldhart Rd
Haines, AK 99827

RE: Chilkoot Lumber Company

Enclosed are the results of analyses for samples received by the laboratory on 07/25/08 11:00. The following list is a summary of the Work Orders contained in this report, generated on 07/29/08 15:44.

If you have any questions concerning this report, please feel free to contact me.

Work Order	Project	ProjectNumber
BRG0331	Chilkoot Lumber Company	88087500

TestAmerica Seattle

Curtis D. Armstrong, Project Manager

TestAmerica
THE LEADER IN ENVIRONMENTAL TESTING

SEATTLE, WA 11720 NORTH CREEK PKWY N, SUITE 400
BOTHELL, WA 98011-8244
PH: (425) 420.9200 FAX: (425) 420.9210

Chilkat Environmental	Project Name:	**Chilkoot Lumber Company**	
223 Oldhart Rd	Project Number:	88087500	Report Created:
Haines, AK 99827	Project Manager:	William Prisciandaro	07/29/08 15:44

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
S-1	BRG0331-01	Soil	07/21/08 16:30	07/25/08 11:00
I-1	BRG0331-02	Other wet	07/23/08 08:00	07/25/08 11:00
Small Capacitor	BRG0331-03	Other wet	07/16/08 17:30	07/25/08 11:00

TestAmerica Seattle

Curtis D. Armstrong, Project Manager

SEATTLE, WA 11720 NORTH CREEK PKWY N, SUITE 400
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Chilkat Environmental	Project Name:	**Chilkoot Lumber Company**	
223 Oldhart Rd	Project Number:	88087500	Report Created:
Haines, AK 99827	Project Manager:	William Prisciandaro	07/29/08 15:44

Analytical Case Narrative

TestAmerica - Seattle, WA

BRG0331

SAMPLE RECEIPT

The samples were received 07/25/08 by TestAmerica - Seattle. The temperature of the samples at the time of receipt was 19.8 degrees Celsius.

PREPARATIONS AND ANALYSIS

Polychlorinated Biphenyls in Oil by EPA Method 8082

Sample BRG0331-03 (Small Capaciter) was not analyzed due to the solubility of the sample. Due to the low oil content of the sample a one liter sample volume would be required for analysis.

No additional anomalies, discrepancies, or issues were associated with sample preparation, analysis and quality control other than those already qualified in the data and described in the Notes and Definitions page at the end of the report.

TestAmerica Seattle

Curtis D. Armstrong, Project Manager

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Chilkat Environmental	Project Name:	**Chilkoot Lumber Company**	
223 Oldhart Rd	Project Number:	88087500	Report Created:
Haines, AK 99827	Project Manager:	William Prisciandaro	07/29/08 15:44

General Chemistry Parameters

TestAmerica Nashville

Analyte	Method	Result	MDL*	MRL	Units	Dil	Batch	Prepared	Analyzed	Notes
BRG0331-01 (S-1)		**Soil**					**Sampled: 07/21/08 16:30**			
% Dry Solids	SW-846	**85.8**	-----	0.500	%	1x	8074198	07/28/08 08:10	07/29/08 09:23	

TestAmerica Seattle

Curtis D. Armstrong, Project Manager

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Chilkat Environmental	Project Name:	**Chilkoot Lumber Company**	
223 Oldhart Rd	Project Number:	88087500	Report Created:
Haines, AK 99827	Project Manager:	William Prisciandaro	07/29/08 15:44

Polychlorinated Biphenyls by EPA Method 8082

TestAmerica Nashville

Analyte	Method	Result	MDL*	MRL	Units	Dil	Batch	Prepared	Analyzed	Notes
BRG0331-01RE1 (S-1)		**Soil**			**Sampled: 07/21/08 16:30**					
PCB-1016	SW846 8082	ND	-----	0.0332	mg/kg	1x	8074123	07/26/08 11:15	07/29/08 08:34	
PCB-1221	"	ND	-----	0.0332	"	"	"	"	"	
PCB-1232	"	ND	-----	0.0332	"	"	"	"	"	
PCB-1242	"	ND	-----	0.0332	"	"	"	"	"	
PCB-1248	"	ND	-----	0.0332	"	"	"	"	"	
PCB-1254	"	ND	-----	0.0332	"	"	"	"	"	
PCB-1260	"	**0.708**	-----	0.0332	"	"	"	"	"	
Surrogate(s): *Tetrachloro-meta-xylene*			*64%*		*15 - 150 %*	"			"	
Decachlorobiphenyl			*94%*		*10 - 150 %*	"			"	

TestAmerica Seattle

Curtis D. Armstrong, Project Manager

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Chilkat Environmental	Project Name:	**Chilkoot Lumber Company**	
223 Oldhart Rd	Project Number:	88087500	Report Created:
Haines, AK 99827	Project Manager:	William Prisciandaro	07/29/08 15:44

Polychlorinated Biphenyls in Oil by EPA Method 8082

TestAmerica Nashville

Analyte	Method	Result	MDL*	MRL	Units	Dil	Batch	Prepared	Analyzed	Notes
BRG0331-02 (I-1)		**Other wet**			**Sampled: 07/23/08 08:00**					
PCB-1016	SW846 8082	ND	-----	0.135	mg/kg	4x	8074124	07/26/08 10:55	07/28/08 15:36	
PCB-1221	"	ND	-----	0.135	"	"	"	"	"	
PCB-1232	"	ND	-----	0.135	"	"	"	"	"	
PCB-1242	"	ND	-----	0.135	"	"	"	"	"	
PCB-1248	"	ND	-----	0.135	"	"	"	"	"	
PCB-1254	"	ND	-----	0.135	"	"	"	"	"	
PCB-1260	"	**70.7**	-----	0.135	"	"	"	"	"	
Surrogate(s): Tetrachloro-meta-xylene			*72%*		*15 - 150 %*	*"*			*"*	
Decachlorobiphenyl			*104%*		*10 - 146 %*	*"*			*"*	

TestAmerica Seattle

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Chilkat Environmental	Project Name:	**Chilkoot Lumber Company**	
223 Oldhart Rd	Project Number:	88087500	Report Created:
Haines, AK 99827	Project Manager:	William Prisciandaro	07/29/08 15:44

General Chemistry Parameters - Laboratory Quality Control Results

TestAmerica Nashville

QC Batch: 8074198 **Soil Preparation Method: % Solids**

Analyte	Method	Result	MDL*	MRL	Units	Dil	Source Result	Spike Amt	% REC	(Limits)	% RPD	(Limits)	Analyzed	Notes
Duplicate (8074198-DUP1)				**QC Source: BRG0331-01**				**Extracted: 07/28/08 08:10**						
% Dry Solids	SW-846	72.3	---	0.500	%	1x	85.8	--	--	--	17%	(20)	07/29/08 09:23	

TestAmerica Seattle

Curtis D. Armstrong, Project Manager

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Chilkat Environmental	Project Name:	**Chilkoot Lumber Company**	
223 Oldhart Rd	Project Number:	88087500	Report Created:
Haines, AK 99827	Project Manager:	William Prisciandaro	07/29/08 15:44

Polychlorinated Biphenyls by EPA Method 8082 - Laboratory Quality Control Results

TestAmerica Nashville

QC Batch: 8074123 **Soil Preparation Method: EPA 3550B**

Analyte	Method	Result	MDL*	MRL	Units	Dil	Source Result	Spike Amt	% REC	(Limits)	% RPD	(Limits)	Analyzed	Notes
Blank (8074123-BLK1)									**Extracted: 07/26/08 11:15**					
PCB-1016	SW846 8082	ND	---	0.0333	mg/kg	1x	--	--	--	--	--	--	07/28/08 12:12	
PCB-1221	"	ND	---	0.0333	"	"	--	--	--	--	--	--	"	
PCB-1232	"	ND	---	0.0333	"	"	--	--	--	--	--	--	"	
PCB-1242	"	ND	---	0.0333	"	"	--	--	--	--	--	--	"	
PCB-1248	"	ND	---	0.0333	"	"	--	--	--	--	--	--	"	
PCB-1254	"	ND	---	0.0333	"	"	--	--	--	--	--	--	"	
PCB-1260	"	ND	---	0.0333	"	"	--	--	--	--	--	--	"	
Surrogate(s): Tetrachloro-meta-xylene		*Recovery: 96%*			*Limits: 15-150%*	"							*07/28/08 12:12*	
Decachlorobiphenyl		*128%*			*10-150%*	"							"	
LCS (8074123-BS1)									**Extracted: 07/26/08 11:15**					
PCB-1016	SW846 8082	0.151	---	0.0333	mg/kg	1x	--	0.167	91%	(53-150)	--	--	07/28/08 12:33	
PCB-1260	"	0.172	---	0.0333	"	"	--	"	103%	(51-141)	--	--	"	
Surrogate(s): Tetrachloro-meta-xylene		*Recovery: 74%*			*Limits: 15-150%*	"							*07/28/08 12:33*	
Decachlorobiphenyl		*126%*			*10-150%*	"							"	
Matrix Spike (8074123-MS1)					**QC Source: NRG2420-01**				**Extracted: 07/26/08 11:15**					
PCB-1016 [2C]	SW846 8082	0.226	---	0.0333	mg/kg	1x	ND	0.167	136%	(16-182)	--	--	07/28/08 12:53	
PCB-1260	"	0.126	---	0.0333	"	"	ND	"	75%	(32-146)	--	--	"	
Surrogate(s): Tetrachloro-meta-xylene		*Recovery: 70%*			*Limits: 15-150%*	"							*07/28/08 12:53*	
Decachlorobiphenyl		*108%*			*10-150%*	"							"	
Matrix Spike Dup (8074123-MSD1)					**QC Source: NRG2420-01**				**Extracted: 07/26/08 11:15**					
PCB-1016 [2C]	SW846 8082	0.147	---	0.0333	mg/kg	1x	ND	0.167	88%	(16-182)	42%	(50)	07/28/08 13:14	
PCB-1260	"	0.124	---	0.0333	"	"	ND	"	74%	(32-146)	2%	"	"	
Surrogate(s): Tetrachloro-meta-xylene		*Recovery: 70%*			*Limits: 15-150%*	"							*07/28/08 13:14*	
Decachlorobiphenyl		*98%*			*10-150%*	"							"	

TestAmerica Seattle

Curtis D. Armstrong, Project Manager

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Chilkat Environmental	Project Name:	**Chilkoot Lumber Company**	
223 Oldhart Rd	Project Number:	88087500	Report Created:
Haines, AK 99827	Project Manager:	William Prisciandaro	07/29/08 15:44

Polychlorinated Biphenyls in Oil by EPA Method 8082 - Laboratory Quality Control Results

TestAmerica Nashville

QC Batch: 8074124 **Oil Preparation Method: EPA 3580A**

Analyte	Method	Result	MDL*	MRL	Units	Dil	Source Result	Spike Amt	% REC	(Limits)	% RPD	(Limits)	Analyzed	Notes
Blank (8074124-BLK1)							**Extracted: 07/26/08 10:55**							
PCB-1016	SW846 8082	ND	---	0.0333	mg/kg	1x	--	--	--	--	--	--	07/28/08 14:15	
PCB-1221	"	ND	---	0.0333	"	"	--	--	--	--	--	--	"	
PCB-1232	"	ND	---	0.0333	"	"	--	--	--	--	--	--	"	
PCB-1242	"	ND	---	0.0333	"	"	--	--	--	--	--	--	"	
PCB-1248	"	ND	---	0.0333	"	"	--	--	--	--	--	--	"	
PCB-1254	"	ND	---	0.0333	"	"	--	--	--	--	--	--	"	
PCB-1260	"	ND	---	0.0333	"	"	--	--	--	--	--	--	"	
Surrogate(s): Tetrachloro-meta-xylene		*Recovery: 106%*			*Limits: 15-150%*	"							*07/28/08 14:15*	
Decachlorobiphenyl		*122%*			*10-146%*	"							"	
LCS (8074124-BS1)							**Extracted: 07/26/08 10:55**							
PCB-1016	SW846 8082	4.91	---	0.0333	mg/kg	1x	--	5.00	98%	(53-150)	--	--	07/28/08 14:35	
PCB-1260	"	5.20	---	0.0333	"	"	--	"	104%	(51-141)	--	--	"	MNR1
Surrogate(s): Tetrachloro-meta-xylene		*Recovery: 106%*			*Limits: 15-150%*	"							*07/28/08 14:35*	
Decachlorobiphenyl		*126%*			*10-146%*	"							"	

TestAmerica Seattle

Curtis D. Armstrong, Project Manager

TestAmerica
THE LEADER IN ENVIRONMENTAL TESTING

SEATTLE, WA 11720 NORTH CREEK PKWY N, SUITE 400
BOTHELL, WA 98011-8244
PH: (425) 420.9200 FAX: (425) 420.9210

Chilkat Environmental	Project Name:	**Chilkoot Lumber Company**	
223 Oldhart Rd	Project Number:	88087500	Report Created:
Haines, AK 99827	Project Manager:	William Prisciandaro	07/29/08 15:44

Notes and Definitions

Report Specific Notes:

MNR1 - There was no MS/MSD analyzed with this batch due to insufficient sample volume. See Blank Spike.

Laboratory Reporting Conventions:

DET - Analyte DETECTED at or above the Reporting Limit. Qualitative Analyses only.

ND - Analyte NOT DETECTED at or above the reporting limit (MDL or MRL, as appropriate).

NR/NA - Not Reported / Not Available

dry - Sample results reported on a Dry Weight Basis. Results and Reporting Limits have been corrected for Percent Dry Weight.

wet - Sample results and reporting limits reported on a Wet Weight Basis (as received). Results with neither 'wet' nor 'dry' are reported on a Wet Weight Basis.

RPD - RELATIVE PERCENT DIFFERENCE (RPDs calculated using Results, not Percent Recoveries).

MRL - METHOD REPORTING LIMIT. Reporting Level at, or above, the lowest level standard of the Calibration Table.

MDL* - METHOD DETECTION LIMIT. Reporting Level at, or above, the statistically derived limit based on 40CFR, Part 136, Appendix B. *MDLs are listed on the report only if the data has been evaluated below the MRL. Results between the MDL and MRL are reported as Estimated Results.

Dil - Dilutions are calculated based on deviations from the standard dilution performed for an analysis, and may not represent the dilution found on the analytical raw data.

Reporting Limits - Reporting limits (MDLs and MRLs) are adjusted based on variations in sample preparation amounts, analytical dilutions and percent solids, where applicable.

Electronic Signature - Electronic Signature added in accordance with TestAmerica's *Electronic Reporting and Electronic Signatures Policy.* Application of electronic signature indicates that the report has been reviewed and approved for release by the laboratory. Electronic signature is intended to be the legally binding equivalent of a traditionally handwritten signature.

TestAmerica Seattle

Curtis D. Armstrong, Project Manager

Seattle
11720 North Creek Parkway N
Suite 400
Bothell, WA 98011
phone 425.420.9200 fax 425.420.9210

Chain of Custody Record

TestAmerica
THE LEADER IN ENVIRONMENTAL TESTING

TestAmerica Laboratories, Inc.

Client Contact	Project Manager:	Site Contact:	Date:	COC No:
Your Company Name here: Chilkat Environmental	Tel/Fax:	Lab Contact:	Carrier:	1 of 1 COCs
Address: PO Box 865	Analysis Turnaround Time			Job No.
City/State/Zip: Haines AK 99827	Calendar (C) or Work Days (W) W			
(xxx) xxx-xxxx Phone: 907 766 3897	TAT if different from Below ____			SDG No.
(xxx) xxx-xxxx FAX	☐ 2 weeks			BRG0331
Project Name: Chilkoot Lumber Company	☐ 1 week			
Site:	☐ 2 days			
PO#	☒ 1 day			

Sample Identification	Sample Date	Sample Time	Sample Type	Matrix	# of Cont.		Sample Specific Notes:
S-1	7/21/08	430pm		Soil	1	SW 846 Method 8082	01
I-1	7/23/08	8:00am		oil	1	SW 846 Method 8082	02
Small Capacitor	7/16/08	5:30pm		oil/water	1	SW 846 Method 8082	water + oil from capacitor 03

Preservation Used: 1= Ice, 2= HCl; 3= H2SO4; 4=HNO3; 5=NaOH; 6= Other ____

Possible Hazard Identification
☐ Non-Hazard ☐ Flammable ☐ Skin Irritant Poison B ☐ Unknown ☐

Sample Disposal (A fee may be assessed if samples are retained longer than 1 month)
☐ Return To Client ☒ Disposal By Lab ☐ Archive For ____ Months

Special Instructions/QC Requirements & Comments:
Please Provide all QA/QC Data Thanks

Relinquished by:	Company:	Date/Time:	Received by:	Company:	Date/Time:
William Prisciandaro	Chilkat Environmental			TA-SEA	7/25/08 1000
Relinquished by:	Company:	Date/Time:	Received by:	Company:	Date/Time:
Relinquished by:	Company:	Date/Time:	Received by:	Company:	Date/Time:

11:00

C lab 11.0 19.8°

TAT: _____ Paperwork to PM – Date:_____ Time:_____ Non-Conformances?

Page Time & Initials:_____ Circle Y or N

(If Y, see other side)

TEST AMERICA SAMPLE RECEIPT CHECKLIST

Received By: (applies to temp at receipt)
Date: 7/25/08
Time: 1000
Initials: FL

Logged-in By:
Date: 7/25
Time: 1115
Initials: CW

Unpacked/Labeled By:
Date: 7/26
Time: 11:20
Initials: CW

Cooler ID: 383

Work Order No. 8RC0331
Client: _____
Project: _____

Container Type:
Y Cooler
____ Box
____ None/Other _____

COC Seals:
X Ship Container
____ On Bottles
____ None
____ Sign By
____ Date

Packing Material:
____ Bubble Bags ____ Styrofoam
____ Foam Packs
X None/Other Newspaper

Refrigerant:
____ Gel Ice Pack _____
____ Loose Ice _____
X None/Other _____

Received Via: Bill#
____ Fed Ex ____ Client
____ UPS X TA Courier
____ DHL ____ Mid Valley
____ Senvoy ____ TDP
X GS ____ Other_____

Cooler Temperature (*IR*): 19.8 °C Plastic Glass (Frozen filters, Tedlars and aqueous Metals exempt)
(circle one)

Temperature Blank? _____°C or NA Trip Blank? Y or N or NA

BP, OPLC,ARCO-Temperature monitoring every 15 minutes:
(initial/date/time):_____
Comments:_____

Sample Containers:		ID			ID
Intact?	Y or N	_____	Metals Preserved?	Y or N or NA	_____
Provided by TA?	Y or N	_____	Client QAPP Preserved?	Y or N or NA	_____
Correct Type?	Y or N	_____	Adequate Volume? (for tests requested)	Y or N	_____
#Containers match COC?	Y or N	_____	Water VOAs: Headspace?	Y or N or NA	_____
IDs/time/date match COC?	Y or N	_____	Comments:		
Hold Times in hold?	Y or N	_____			

PROJECT MANAGEMENT

Is the Chain of Custody complete? Y or N If N, circle the items that were incomplete

Comments,Problems_____

Total access set up? Y or N
Has client been contacted regarding non-conformances? Y or N If Y, ____/____ Date Time

PM Initials: _____ Date: _____ Time: _____

(rev 4, 01/24/07)

NOTIFICATION OF DISCREPANCY

DATE: 7/25/04 *TIME:* 1000 *PM:* CA *SC INITIALS:* FL	
Rush/Short Hold? ☒ *Yes* ☐ *No*	

☐ **Project Not Set Up in ELM** ☐ **New Client** ☐ **COC Received ON HOLD**
☐ **Analysis Requested on COC – Not Listed for Project in ELM**

☐ **PM To Add Analysis:** _____
☐ **Clarification of Analysis:** _____
☐ **Hold Time Expired: (Analysis)** _____
☐ **Turnaround Time Not Checked:** _____
☐ **Did Not Receive Sample(s) Listed on COC:** _____
_____
☐ **Received Extra Sample(s) Not Listed on COC:** _____
_____
☐ **Sample Description(s) or Date/Time Sampled Do Not Match COC:**
_____
_____
_____

☐ **Improper Preservative For method:** _____
☐ **Sample Received Broken:** _____
☐ **Insufficient Sample Volume:** _____
☐ **Sample preserved upon receipt:** _____
_____
☒ **Temperature Outside recommended range (4°C±2°C):** 19.8°C
☐ **Received on-ice within 4 hours of collection, temperature between ambient to 2°C acceptable.**
☐ **Other:**
_____
_____
_____
_____

PROJECT MANAGER RESOLUTION: (Date & Time when returned to SC)
Approval By: **Date:** **Time:**

(rev 4. 01/24/07)

Attachment K:
Test America Report 7.1.08

TestAmerica
THE LEADER IN ENVIRONMENTAL TESTING

SEATTLE, WA 11720 NORTH CREEK PKWY N, SUITE 400
BOTHELL, WA 98011-8244
PH: (425) 420.9200 FAX: (425) 420.9210
CS Approval Number: UST-067

July 02, 2008

William Prisciandaro
Chilkat Environmental
223 Oldhart Rd
Haines, AK 99827

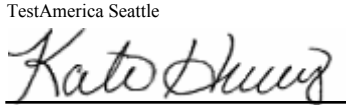
RE: Chilkoot Lumber Company

Enclosed are the results of analyses for samples received by the laboratory on 07/01/08 15:25. The following list is a summary of the Work Orders contained in this report, generated on 07/02/08 15:21.

If you have any questions concerning this report, please feel free to contact me.

Work Order	Project	ProjectNumber
BRG0008	Chilkoot Lumber Company	88087500

TestAmerica Seattle



Kate Haney For Curtis D. Armstrong, Project Manager

TestAmerica
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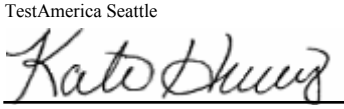
SEATTLE, WA 11720 NORTH CREEK PKWY N, SUITE 400
BOTHELL, WA 98011-8244
PH: (425) 420.9200 FAX: (425) 420.9210
CS Approval Number: UST-067

Chilkat Environmental	Project Name:	**Chilkoot Lumber Company**	
223 Oldhart Rd	Project Number:	88087500	Report Created:
Haines, AK 99827	Project Manager:	William Prisciandaro	07/02/08 15:21

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
C-1	BRG0008-01	Other wet	06/27/08 13:28	07/01/08 15:25
C-2	BRG0008-02	Other wet	06/27/08 13:46	07/01/08 15:25
C-3	BRG0008-03	Other wet	06/27/08 14:12	07/01/08 15:25
C-4	BRG0008-04	Other wet	06/27/08 14:40	07/01/08 15:25
C-5	BRG0008-05	Other wet	06/27/08 14:45	07/01/08 15:25
C-6	BRG0008-06	Other wet	06/28/08 09:07	07/01/08 15:25
C-7	BRG0008-07	Other wet	06/28/08 09:27	07/01/08 15:25
C-8	BRG0008-08	Other wet	06/28/08 13:48	07/01/08 15:25

TestAmerica Seattle



Kate Haney For Curtis D. Armstrong, Project Manager

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Chilkat Environmental	Project Name:	**Chilkoot Lumber Company**	
223 Oldhart Rd	Project Number:	88087500	Report Created:
Haines, AK 99827	Project Manager:	William Prisciandaro	07/02/08 15:21

Analytical Case Narrative

TestAmerica - Seattle, WA

BRG0008

SAMPLE RECEIPT

The samples were received July 1st, 2008 by TestAmerica - Seattle. The temperature of the samples at the time of receipt was 22.3 degrees Celsius. The requested TAT was chaged to 1 day instead of 2 as indicated on the chain of custody document per Chilkat Environmental.

PREPARATIONS AND ANALYSIS

No anomalies were associated with the sample preparation and analysis. All criteria for acceptable QC measurements were met.

TestAmerica Seattle

Kate Haney For Curtis D. Armstrong, Project Manager

TestAmerica
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CS Approval Number: UST-067

Chilkat Environmental	Project Name:	**Chilkoot Lumber Company**	
223 Oldhart Rd	Project Number:	88087500	Report Created:
Haines, AK 99827	Project Manager:	William Prisciandaro	07/02/08 15:21

Polychlorinated Biphenyls in Oil by EPA Method 8082

TestAmerica Seattle

Analyte	Method	Result	MDL*	MRL	Units	Dil	Batch	Prepared	Analyzed	Analyst	Notes
BRG0008-01 (C-1)			**Other wet**				**Sampled: 06/27/08 13:28**				
Aroclor 1016	EPA 8082	ND	-----	1.00	mg/kg	1x	8G01057	07/01/08 16:01	07/02/08 10:55	mam	
Aroclor 1221	"	ND	-----	1.00	"	"	"	"	"	mam	
Aroclor 1232	"	ND	-----	1.00	"	"	"	"	"	mam	
Aroclor 1242	"	ND	-----	1.00	"	"	"	"	"	mam	
Aroclor 1248	"	ND	-----	1.00	"	"	"	"	"	mam	
Aroclor 1254	"	ND	-----	1.00	"	"	"	"	"	mam	
Aroclor 1260	"	ND	-----	1.00	"	"	"	"	"	mam	
Aroclor 1262	"	ND	-----	1.00	"	"	"	"	"	mam	
Aroclor 1268	"	ND	-----	1.00	"	"	"	"	"	mam	
Surrogate(s): *TCX*			*60.3%*		*40 - 130 %*	"			"		
Decachlorobiphenyl			*136%*		*40 - 130 %*	"			"		***Z2***
BRG0008-02 (C-2)			**Other wet**				**Sampled: 06/27/08 13:46**				
Aroclor 1016	EPA 8082	ND	-----	1.00	mg/kg	1x	8G01057	07/01/08 16:01	07/02/08 12:06	mam	
Aroclor 1221	"	ND	-----	1.00	"	"	"	"	"	mam	
Aroclor 1232	"	ND	-----	1.00	"	"	"	"	"	mam	
Aroclor 1242	"	ND	-----	1.00	"	"	"	"	"	mam	
Aroclor 1248	"	ND	-----	1.00	"	"	"	"	"	mam	
Aroclor 1254	"	ND	-----	1.00	"	"	"	"	"	mam	
Aroclor 1260	"	ND	-----	1.00	"	"	"	"	"	mam	
Aroclor 1262	"	ND	-----	1.00	"	"	"	"	"	mam	
Aroclor 1268	"	ND	-----	1.00	"	"	"	"	"	mam	
Surrogate(s): *TCX*			*54.4%*		*40 - 130 %*	"			"		
Decachlorobiphenyl			*92.4%*		*40 - 130 %*	"			"		
BRG0008-03 (C-3)			**Other wet**				**Sampled: 06/27/08 14:12**				
Aroclor 1016	EPA 8082	ND	-----	1.00	mg/kg	1x	8G01057	07/01/08 16:01	07/02/08 12:24	mam	
Aroclor 1221	"	ND	-----	1.00	"	"	"	"	"	mam	
Aroclor 1232	"	ND	-----	1.00	"	"	"	"	"	mam	
Aroclor 1242	"	ND	-----	1.00	"	"	"	"	"	mam	
Aroclor 1248	"	ND	-----	1.00	"	"	"	"	"	mam	
Aroclor 1254	"	ND	-----	1.00	"	"	"	"	"	mam	
Aroclor 1260	"	ND	-----	1.00	"	"	"	"	"	mam	
Aroclor 1262	"	ND	-----	1.00	"	"	"	"	"	mam	
Aroclor 1268	"	ND	-----	1.00	"	"	"	"	"	mam	
Surrogate(s): *TCX*			*80.1%*		*40 - 130 %*	"			"		

TestAmerica Seattle

Kate Haney For Curtis D. Armstrong, Project Manager

TestAmerica
THE LEADER IN ENVIRONMENTAL TESTING

SEATTLE, WA 11720 NORTH CREEK PKWY N, SUITE 400
BOTHELL, WA 98011-8244
PH: (425) 420.9200 FAX: (425) 420.9210
CS Approval Number: UST-067

Chilkat Environmental	Project Name:	**Chilkoot Lumber Company**	
223 Oldhart Rd	Project Number:	88087500	Report Created:
Haines, AK 99827	Project Manager:	William Prisciandaro	07/02/08 15:21

Polychlorinated Biphenyls in Oil by EPA Method 8082

TestAmerica Seattle

Analyte	Method	Result	MDL*	MRL	Units	Dil	Batch	Prepared	Analyzed	Analyst	Notes
BRG0008-03 (C-3)		**Other wet**				**Sampled: 06/27/08 14:12**					
Decachlorobiphenyl		*97.6%*			*40 - 130 %*	*1x*			*07/02/08 12:24*		
BRG0008-04 (C-4)		**Other wet**				**Sampled: 06/27/08 14:40**					
Aroclor 1016	EPA 8082	ND	-----	1.00	mg/kg	1x	8G01057	07/01/08 16:01	07/02/08 11:48	mam	
Aroclor 1221	"	ND	-----	1.00	"	"	"	"	"	mam	
Aroclor 1232	"	ND	-----	1.00	"	"	"	"	"	mam	
Aroclor 1242	"	ND	-----	1.00	"	"	"	"	"	mam	
Aroclor 1248	"	ND	-----	1.00	"	"	"	"	"	mam	
Aroclor 1254	"	ND	-----	1.00	"	"	"	"	"	mam	
Aroclor 1260	"	ND	-----	1.00	"	"	"	"	"	mam	
Aroclor 1262	"	ND	-----	1.00	"	"	"	"	"	mam	
Aroclor 1268	"	ND	-----	1.00	"	"	"	"	"	mam	
Surrogate(s): *TCX*		*65.2%*			*40 - 130 %*	"			"		
Decachlorobiphenyl		*96.5%*			*40 - 130 %*	"			"		
BRG0008-05 (C-5)		**Other wet**				**Sampled: 06/27/08 14:45**					
Aroclor 1016	EPA 8082	ND	-----	1.00	mg/kg	1x	8G01057	07/01/08 16:01	07/02/08 12:41	mam	
Aroclor 1221	"	ND	-----	1.00	"	"	"	"	"	mam	
Aroclor 1232	"	ND	-----	1.00	"	"	"	"	"	mam	
Aroclor 1242	"	ND	-----	1.00	"	"	"	"	"	mam	
Aroclor 1248	"	ND	-----	1.00	"	"	"	"	"	mam	
Aroclor 1254	"	ND	-----	1.00	"	"	"	"	"	mam	
Aroclor 1260	"	ND	-----	1.00	"	"	"	"	"	mam	
Aroclor 1262	"	ND	-----	1.00	"	"	"	"	"	mam	
Aroclor 1268	"	ND	-----	1.00	"	"	"	"	"	mam	
Surrogate(s): *TCX*		*61.4%*			*40 - 130 %*	"			"		
Decachlorobiphenyl		*77.4%*			*40 - 130 %*	"			"		
BRG0008-06 (C-6)		**Other wet**				**Sampled: 06/28/08 09:07**					
Aroclor 1016	EPA 8082	ND	-----	1.00	mg/kg	1x	8G01057	07/01/08 16:01	07/02/08 12:59	mam	
Aroclor 1221	"	ND	-----	1.00	"	"	"	"	"	mam	
Aroclor 1232	"	ND	-----	1.00	"	"	"	"	"	mam	
Aroclor 1242	"	ND	-----	1.00	"	"	"	"	"	mam	
Aroclor 1248	"	ND	-----	1.00	"	"	"	"	"	mam	
Aroclor 1254	"	ND	-----	1.00	"	"	"	"	"	mam	
Aroclor 1260	"	ND	-----	1.00	"	"	"	"	"	mam	

TestAmerica Seattle

Kate Haney For Curtis D. Armstrong, Project Manager

TestAmerica
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SEATTLE, WA 11720 NORTH CREEK PKWY N, SUITE 400
BOTHELL, WA 98011-8244
PH: (425) 420.9200 FAX: (425) 420.9210
CS Approval Number: UST-067

Chilkat Environmental	Project Name:	**Chilkoot Lumber Company**	
223 Oldhart Rd	Project Number:	88087500	Report Created:
Haines, AK 99827	Project Manager:	William Prisciandaro	07/02/08 15:21

Polychlorinated Biphenyls in Oil by EPA Method 8082

TestAmerica Seattle

Analyte	Method	Result	MDL*	MRL	Units	Dil	Batch	Prepared	Analyzed	Analyst	Notes
BRG0008-06 (C-6)			**Other wet**				**Sampled: 06/28/08 09:07**				
Aroclor 1262	EPA 8082	ND	-----	1.00	mg/kg	1x	8G01057	07/01/08 16:01	07/02/08 12:59	mam	
Aroclor 1268	"	ND	-----	1.00	"	"	"	"	"	mam	
Surrogate(s): TCX			*68.4%*		*40 - 130 %*	"			"		
Decachlorobiphenyl			*87.3%*		*40 - 130 %*	"			"		
BRG0008-07 (C-7)			**Other wet**				**Sampled: 06/28/08 09:27**				
Aroclor 1016	EPA 8082	ND	-----	1.00	mg/kg	1x	8G01057	07/01/08 16:01	07/02/08 13:17	mam	
Aroclor 1221	"	ND	-----	1.00	"	"	"	"	"	mam	
Aroclor 1232	"	ND	-----	1.00	"	"	"	"	"	mam	
Aroclor 1242	"	ND	-----	1.00	"	"	"	"	"	mam	
Aroclor 1248	"	ND	-----	1.00	"	"	"	"	"	mam	
Aroclor 1254	"	ND	-----	1.00	"	"	"	"	"	mam	
Aroclor 1260	"	ND	-----	1.00	"	"	"	"	"	mam	
Aroclor 1262	"	ND	-----	1.00	"	"	"	"	"	mam	
Aroclor 1268	"	ND	-----	1.00	"	"	"	"	"	mam	
Surrogate(s): TCX			*51.9%*		*40 - 130 %*	"			"		
Decachlorobiphenyl			*79.0%*		*40 - 130 %*	"			"		
BRG0008-08 (C-8)			**Other wet**				**Sampled: 06/28/08 13:48**				
Aroclor 1016	EPA 8082	ND	-----	1.00	mg/kg	1x	8G01057	07/01/08 16:01	07/02/08 13:34	mam	
Aroclor 1221	"	ND	-----	1.00	"	"	"	"	"	mam	
Aroclor 1232	"	ND	-----	1.00	"	"	"	"	"	mam	
Aroclor 1242	"	ND	-----	1.00	"	"	"	"	"	mam	
Aroclor 1248	"	ND	-----	1.00	"	"	"	"	"	mam	
Aroclor 1254	"	ND	-----	1.00	"	"	"	"	"	mam	
Aroclor 1260	"	ND	-----	1.00	"	"	"	"	"	mam	
Aroclor 1262	"	ND	-----	1.00	"	"	"	"	"	mam	
Aroclor 1268	"	ND	-----	1.00	"	"	"	"	"	mam	
Surrogate(s): TCX			*56.0%*		*40 - 130 %*	"			"		
Decachlorobiphenyl			*76.3%*		*40 - 130 %*	"			"		

TestAmerica Seattle

Kate Haney For Curtis D. Armstrong, Project Manager

TestAmerica
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PH: (425) 420.9200 FAX: (425) 420.9210
CS Approval Number: UST-067

Chilkat Environmental	Project Name:	**Chilkoot Lumber Company**	
223 Oldhart Rd	Project Number:	88087500	Report Created:
Haines, AK 99827	Project Manager:	William Prisciandaro	07/02/08 15:21

Polychlorinated Biphenyls in Oil by EPA Method 8082 - Laboratory Quality Control Results

TestAmerica Seattle

QC Batch: 8G01057 **Other wet Preparation Method: EPA 3580A**

Analyte	Method	Result	MDL*	MRL	Units	Dil	Source Result	Spike Amt	% REC	(Limits)	% RPD	(Limits)	Analyzed	Notes
Blank (8G01057-BLK1)									**Extracted: 07/01/08 16:01**					
Aroclor 1016	EPA 8082	ND	---	1.00	mg/kg	1x	--	--	--	--	--	--	07/02/08 07:41	
Aroclor 1221	"	ND	---	1.00	"	"	--	--	--	--	--	--	"	
Aroclor 1232	"	ND	---	1.00	"	"	--	--	--	--	--	--	"	
Aroclor 1242	"	ND	---	1.00	"	"	--	--	--	--	--	--	"	
Aroclor 1248	"	ND	---	1.00	"	"	--	--	--	--	--	--	"	
Aroclor 1254	"	ND	---	1.00	"	"	--	--	--	--	--	--	"	
Aroclor 1260	"	ND	---	1.00	"	"	--	--	--	--	--	--	"	
Aroclor 1262	"	ND	---	1.00	"	"	--	--	--	--	--	--	"	
Aroclor 1268	"	ND	---	1.00	"	"	--	--	--	--	--	--	"	
Surrogate(s): TCX		*Recovery: 101%*			*Limits: 40-130%*	"							*07/02/08 07:41*	
Decachlorobiphenyl		*116%*			*40-130%*	"							"	
LCS (8G01057-BS1)									**Extracted: 07/01/08 16:01**					
Aroclor 1016	EPA 8082	5.02	---	1.00	mg/kg	1x	--	5.00	100%	(30-132)	--	--	07/02/08 07:58	
Aroclor 1260	"	4.33	---	1.00	"	"	--	"	86.5%	"	--	--	"	
Surrogate(s): TCX		*Recovery: 100%*			*Limits: 40-130%*	"							*07/02/08 07:58*	
Decachlorobiphenyl		*109%*			*40-130%*	"							"	
LCS Dup (8G01057-BSD1)									**Extracted: 07/01/08 16:01**					
Aroclor 1016	EPA 8082	4.85	---	1.00	mg/kg	1x	--	5.00	97.0%	(30-132)	3.44%	(19)	07/02/08 08:16	
Aroclor 1260	"	4.74	---	1.00	"	"	--	"	94.8%	"	9.12%	"	"	
Surrogate(s): TCX		*Recovery: 97.0%*			*Limits: 40-130%*	"							*07/02/08 08:16*	
Decachlorobiphenyl		*114%*			*40-130%*	"							"	

TestAmerica Seattle

Kate Haney For Curtis D. Armstrong, Project Manager

TestAmerica
THE LEADER IN ENVIRONMENTAL TESTING

SEATTLE, WA 11720 NORTH CREEK PKWY N, SUITE 400
BOTHELL, WA 98011-8244
PH: (425) 420.9200 FAX: (425) 420.9210
CS Approval Number: UST-067

Chilkat Environmental	Project Name:	**Chilkoot Lumber Company**	
223 Oldhart Rd	Project Number:	88087500	Report Created:
Haines, AK 99827	Project Manager:	William Prisciandaro	07/02/08 15:21

Notes and Definitions

Report Specific Notes:

Z2 - Surrogate recovery was above the acceptance limits. Data not impacted.

Laboratory Reporting Conventions:

DET - Analyte DETECTED at or above the Reporting Limit. Qualitative Analyses only.

ND - Analyte NOT DETECTED at or above the reporting limit (MDL or MRL, as appropriate).

NR/NA - Not Reported / Not Available

dry - Sample results reported on a Dry Weight Basis. Results and Reporting Limits have been corrected for Percent Dry Weight.

wet - Sample results and reporting limits reported on a Wet Weight Basis (as received). Results with neither 'wet' nor 'dry' are reported on a Wet Weight Basis.

RPD - RELATIVE PERCENT DIFFERENCE (RPDs calculated using Results, not Percent Recoveries).

MRL - METHOD REPORTING LIMIT. Reporting Level at, or above, the lowest level standard of the Calibration Table.

MDL* - METHOD DETECTION LIMIT. Reporting Level at, or above, the statistically derived limit based on 40CFR, Part 136, Appendix B. *MDLs are listed on the report only if the data has been evaluated below the MRL. Results between the MDL and MRL are reported as Estimated Results.

Dil - Dilutions are calculated based on deviations from the standard dilution performed for an analysis, and may not represent the dilution found on the analytical raw data.

Reporting Limits - Reporting limits (MDLs and MRLs) are adjusted based on variations in sample preparation amounts, analytical dilutions and percent solids, where applicable.

Electronic Signature - Electronic Signature added in accordance with TestAmerica's *Electronic Reporting and Electronic Signatures Policy.* Application of electronic signature indicates that the report has been reviewed and approved for release by the laboratory. Electronic signature is intended to be the legally binding equivalent of a traditionally handwritten signature.

TestAmerica Seattle

Kate Haney For Curtis D. Armstrong, Project Manager

TestAmerica

THE LEADER IN ENVIRONMENTAL TESTING

11720 North Creek Pkwy N Suite 400, Bothell, WA 98011-8244 425-420-9200 FAX 420-9210
11922 E. First Ave, Spokane, WA 99206-5302 509-924-9200 FAX 924-9290
9405 SW Nimbus Ave,Beaverton, OR 97008-7145 503-906-9200 FAX 906-9210
2000 W International Airport Rd Ste A10, Anchorage, AK 99502-1119 907-563-9200 FAX 563-9210

CHAIN OF CUSTODY REPORT

Work Order #: BRG0008

CLIENT: Chilkat Environmental

REPORT TO: Chilkat Environmental
ADDRESS: P.O. 865
Haines AK 99827
PHONE: 907 766 3897 FAX: 530 466 3102

INVOICE TO: Chilkat Environmental
PO Box 865
Haines AK 99827

P.O. NUMBER:

PROJECT NAME: Chilkoot Lumber Company
PROJECT NUMBER: 88087500
SAMPLED BY: Elijah Donat

TURNAROUND REQUEST in Business Days *

Organic & Inorganic Analyses: [10] STD. [7] [5] [4] [3] [2] [1] [<1]

Petroleum Hydrocarbon Analyses: [5] STD. [4] [3] [2] [1] [<1]

[OTHER] Specify: 2 days

* Turnaround Requests less than standard may incur Rush Charges.

	CLIENT SAMPLE IDENTIFICATION	SAMPLING DATE/TIME	REQUESTED ANALYSES	PRESERVATIVE	MATRIX (W, S, O)	# OF CONT.	LOCATION/ COMMENTS	TA WO ID
1	C-1	6/27/08 128pm	SW 846 method 8082		O,1	1		01
2	C-2	6/27/08 146pm	SW 846 method 8082		O,1	1		02
3	C-3	6/27/08 2:12pm	SW 846 method 8082		O,1	1		03
4	C-4	6/27/08 240pm	SW 846 method 8082		O,1	1		04
5	C-5	6/27/08 2:45pm	SW 846 method 8082		O,1	1		05
6	C-6	6/28/08 9:07am	SW 846 method 8082		O,1	1		06
7	C-7	6/28/08 9:27am	SW 846 method 8082		O,1	1		07
8	C-8	6/28/08 148pm	SW 846 method 8082		O,1	1		08
9								
10								

RELEASED BY: Elijah Donat DATE: 6/28/08
PRINT NAME: FIRM: Chilkat Environmental TIME: 3:45pm

RECEIVED BY: DATE: 7/1/08
PRINT NAME: Francisco Luna, Jr FIRM: TA-SEA TIME: 1525

RELEASED BY: DATE:
PRINT NAME: FIRM: TIME:

RECEIVED BY: DATE:
PRINT NAME: FIRM: TIME:

ADDITIONAL REMARKS: 2 Day Turnaround + Please Provide all QA QC Data w/cs

TEMP: 22.3 °C

PAGE OF

TAL-1000(0408)

Attachment L:
Certificates of Disposal and Letters from Waste Management Inc.

Transformer 516

CHEMICAL WASTE MANAGEMENT OF THE NW
17629 Cedar Springs Lane
Arlington, OR 97812
(541) 454-2643
(541) 454-3279 Fax

CHILKOOT LUMBER COMPANY
AKW000202895
5 MILE LUTAK HWY
HAINES AK 99827

CERTIFICATE OF DISPOSAL

Chemical Waste Management of the Northwest, Inc., ORD089452353, has received the following waste material and certifies that the material has been landfilled in accordance with 40 CFR part 761 as it pertains to the land disposal of Polychlorinated Biphenyl contaminated materials.

GENERATOR:	CHILKOOT LUMBER COMPANY
MANIFEST #:	001364531JJK
LINE ITEM:	27b.12
PROFILE #:	OR300430
CWM TRACKING ID:	400321-11
RECEIVED DATE:	12/23/08
DISPOSAL METHOD:	LANDFILL

DRUM #(S)		DISPOSAL DATE	DISPOSAL LOCATION
O-2	CARCASS ONLY	6/8/09	LANDFILL 14

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615) I certify that the information contained in or accompanying this document is true, accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate and complete.

Becky Sumner

CWMNW RECORDS DEPARTMENT
Date 6/10/09

Transformer Shells

WASTE MANAGEMENT

CHEMICAL WASTE MANAGEMENT OF THE NW
17629 Cedar Springs Lane
Arlington, OR 97812
(541) 454-2643
(541) 454-3279 Fax

CHILKOOT LUMBER CO
AKW000202895
5 MILE LUTAK HWY
HAINES AK 99827

CERTIFICATE OF DISPOSAL

Chemical Waste Management of the Northwest, Inc., ORD089452353, has received the following waste material and certifies that the material has been landfilled in accordance with 40 CFR part 761 as it pertains to the land disposal of Polychlorinated Biphenyl contaminated materials.

GENERATOR:	CHILKOOT LUMBER CO
MANIFEST #:	001364531JJK
LINE ITEM:	27b.8
PROFILE #:	OR300430
CWM TRACKING ID:	400321-07
RECEIVED DATE:	12/23/08
DISPOSAL METHOD:	LANDFILL

DRUM #(S)	DISPOSAL DATE	DISPOSAL LOCATION
518	1/6/09	LANDFILL 14
519	1/6/09	LANDFILL 14
527	1/6/09	LANDFILL 14
529	1/6/09	LANDFILL 14
516	1/6/09	LANDFILL 14
520	1/6/09	LANDFILL 14
503	1/6/09	LANDFILL 14

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Becky Sumner

CWMNW RECORDS DEPARTMENT
Date 1/13/09

PCB Solids

WASTE MANAGEMENT

CHEMICAL WASTE MANAGEMENT OF THE NW
17629 Cedar Springs Lane
Arlington, OR 97812
(541) 454-2643
(541) 454-3279 Fax

CHILKOOT LUMBER CO
AKW000202895
5 MILE LUTAK HWY
HAINES AK 99827

CERTIFICATE OF DISPOSAL

Chemical Waste Management of the Northwest, Inc., ORD089452353, has received the following waste material and certifies that the material has been landfilled in accordance with 40 CFR part 761 as it pertains to the land disposal of Polychlorinated Biphenyl contaminated materials.

GENERATOR:	CHILKOOT LUMBER CO
MANIFEST #:	001364529JJK
LINE ITEM:	27b.6
PROFILE #:	OR300429
CWM TRACKING ID:	400138-06
RECEIVED DATE:	12/08/08
DISPOSAL METHOD:	LANDFILL

DRUM #(S)	DISPOSAL DATE	DISPOSAL LOCATION
TOTE 1	12/23/08	LANDFILL 14

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Becky Sumner

CWMNW RECORDS DEPARTMENT
Date 1/13/09

PCB Liquid Trailer 1

WASTE MANAGEMENT

CHEMICAL WASTE MANAGEMENT OF THE NW
17629 Cedar Springs Lane
Arlington, OR 97812
(541) 454-2643
(541) 454-3279 Fax

CHILKOOT LUMBER COMPANY
AKW000202895
5 MILE LUTAK HWY
HAINES AK 99827

CERTIFICATE OF DISPOSAL

Chemical Waste Management of the Northwest, Inc., ORD089452353, has received the following waste material:

GENERATOR:	CHILKOOT LUMBER COMPANY
MANIFEST #:	185292a
CWM TRACKING ID:	400794-02
PROFILE#:	OR300449
LINE ITEM:	11.b
QUANTITY:	52 DM
RECEIVED DATE:	01/21/09
DISPOSAL PROCESS(ES):	SOLIDIFICATION FOLLOWED BY LANDFILL
FINAL DISPOSAL LOCATION:	LANDFILL 14
DISPOSAL DATE:	01/30/09

I certify, on behalf of the above listed treatment facility, that to the best of my knowledge, the above-described waste material was managed in compliance with all applicable laws, regulations, permits and licenses on the date listed above.

Julie Mikkola

CWMNW RECORDS DEPARTMENT
Date: 02/13/09

PCB Pumps

WASTE MANAGEMENT

CHEMICAL WASTE MANAGEMENT OF THE NW
17629 Cedar Springs Lane
Arlington, OR 97812
(541) 454-2643
(541) 454-3279 Fax

CHILKOOT LUMBER CO
AKW000202895
5 MILE LUTAK HWY
HAINES AK 99827

CERTIFICATE OF DISPOSAL

Chemical Waste Management of the Northwest, Inc., ORD089452353, has received the following waste material and certifies that the material has been landfilled in accordance with 40 CFR part 761 as it pertains to the land disposal of Polychlorinated Biphenyl contaminated materials.

GENERATOR:	CHILKOOT LUMBER CO
MANIFEST #:	001364531JJK
LINE ITEM:	27b.6
PROFILE #:	OR300446
CWM TRACKING ID:	400321-05
RECEIVED DATE:	12/23/08
DISPOSAL METHOD:	LANDFILL

DRUM #(S)	DISPOSAL DATE	DISPOSAL LOCATION
O-40	1/6/09	LANDFILL 14

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Becky Sumner

CWMNW RECORDS DEPARTMENT
Date 1/13/09

PCB Plumbing + SL

WASTE MANAGEMENT

CHEMICAL WASTE MANAGEMENT OF THE NW
17629 Cedar Springs Lane
Arlington, OR 97812
(541) 454-2643
(541) 454-3279 Fax

CHILKOOT LUMBER CO
AKW000202895
5 MILE LUTAK HWY
HAINES AK 99827

CERTIFICATE OF DISPOSAL

Chemical Waste Management of the Northwest, Inc., ORD089452353, has received the following waste material and certifies that the material has been landfilled in accordance with 40 CFR part 761 as it pertains to the land disposal of Polychlorinated Biphenyl contaminated materials.

GENERATOR:	CHILKOOT LUMBER CO
MANIFEST #:	001364531JJK
LINE ITEM:	27b.7
PROFILE #:	OR300446
CWM TRACKING ID:	400321-06
RECEIVED DATE:	12/23/08
DISPOSAL METHOD:	LANDFILL

DRUM #(S)	DISPOSAL DATE	DISPOSAL LOCATION
O-38	1/6/09	LANDFILL 14

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Becky Sumner

CWMNW RECORDS DEPARTMENT
Date 1/13/09

Capacitors + Insulators

WASTE MANAGEMENT

CHEMICAL WASTE MANAGEMENT OF THE NW
17629 Cedar Springs Lane
Arlington, OR 97812
(541) 454-2643
(541) 454-3279 Fax

CHILKOOT LUMBER CO
AKW000202895
5 MILE LUTAK HWY
HAINES AK 99827

CERTIFICATE OF DISPOSAL

Chemical Waste Management of the Northwest, Inc., ORD089452353, has received the following waste material and certifies that the material has been landfilled in accordance with 40 CFR part 761 as it pertains to the land disposal of Polychlorinated Biphenyl contaminated materials.

GENERATOR:	CHILKOOT LUMBER CO
MANIFEST #:	001364529JJK
LINE ITEM:	27b.5
PROFILE #:	OR300430
CWM TRACKING ID:	400138-05
RECEIVED DATE:	12/08/08
DISPOSAL METHOD:	LANDFILL

DRUM #(S)	DISPOSAL DATE	DISPOSAL LOCATION
O-3	12/23/08	LANDFILL 14
O-5	12/23/08	LANDFILL 14
O-6	12/23/08	LANDFILL 14

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Becky Sumner

CWMNW RECORDS DEPARTMENT
Date 1/13/09

Trailer 2 >50 ppm

WASTE MANAGEMENT

CHEMICAL WASTE MANAGEMENT OF THE NW

17629 Cedar Springs Lane
Arlington, OR 97812
(541) 454-2643
(541) 454-3279 Fax

CHILKOOT LUMBER COMPANY
AKW000202895
5 MILE LUTAK HWY
HAINES AK 99827

CERTIFICATE OF DISPOSAL

Chemical Waste Management of the Northwest, Inc., ORD089452353, has received the following waste material and certifies that the material has been landfilled in accordance with 40 CFR part 761 as it pertains to the land disposal of Polychlorinated Biphenyl contaminated materials.

GENERATOR:	CHILKOOT LUMBER COMPANY
MANIFEST #:	001364529JJK
LINE ITEM:	9b.4
PROFILE #:	OR300428
CWM TRACKING ID:	400138-04
RECEIVED DATE:	12/08/08
DISPOSAL METHOD:	INCINERATION

DRUM #(S)	DISPOSAL DATE	DISPOSAL LOCATION
D48	1/22/09	VEOLIA ES TECHNICAL SOLUTIONS, TXD000838896
D49	1/22/09	VEOLIA ES TECHNICAL SOLUTIONS, TXD000838896
D50	1/22/09	VEOLIA ES TECHNICAL SOLUTIONS, TXD000838896
D51	1/22/09	VEOLIA ES TECHNICAL SOLUTIONS, TXD000838896
D52	1/22/09	VEOLIA ES TECHNICAL SOLUTIONS, TXD000838896
D53	1/22/09	VEOLIA ES TECHNICAL SOLUTIONS, TXD000838896
D54	1/22/09	VEOLIA ES TECHNICAL SOLUTIONS, TXD000838896
D55	1/22/09	VEOLIA ES TECHNICAL SOLUTIONS, TXD000838896
D56	1/22/09	VEOLIA ES TECHNICAL SOLUTIONS, TXD000838896
D57	1/22/09	VEOLIA ES TECHNICAL SOLUTIONS, TXD000838896
D58	1/22/09	VEOLIA ES TECHNICAL SOLUTIONS, TXD000838896
D59	1/22/09	VEOLIA ES TECHNICAL SOLUTIONS, TXD000838896
D60	1/22/09	VEOLIA ES TECHNICAL SOLUTIONS, TXD000838896
D61	1/22/09	VEOLIA ES TECHNICAL SOLUTIONS, TXD000838896
D71	1/22/09	VEOLIA ES TECHNICAL SOLUTIONS, TXD000838896
D72	1/22/09	VEOLIA ES TECHNICAL SOLUTIONS, TXD000838896
D73	1/22/09	VEOLIA ES TECHNICAL SOLUTIONS, TXD000838896
D74	1/22/09	VEOLIA ES TECHNICAL SOLUTIONS, TXD000838896
D75	1/22/09	VEOLIA ES TECHNICAL SOLUTIONS, TXD000838896
D76	1/22/09	VEOLIA ES TECHNICAL SOLUTIONS, TXD000838896
D77	1/22/09	VEOLIA ES TECHNICAL SOLUTIONS, TXD000838896

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Becky Sumner

CWMNW RECORDS DEPARTMENT
Date 4/27/09

Trailer 3 >50 ppm

WASTE MANAGEMENT

CHEMICAL WASTE MANAGEMENT OF THE NW

17629 Cedar Springs Lane
Arlington, OR 97812
(541) 454-2643
(541) 454-3279 Fax

CHILKOOT LUMBER COMPANY
AKW000202895
5 MILE LUTAK HWY
HAINES AK 99827

CERTIFICATE OF DISPOSAL

Chemical Waste Management of the Northwest, Inc., ORD089452353, has received the following waste material and certifies that the material has been landfilled in accordance with 40 CFR part 761 as it pertains to the land disposal of Polychlorinated Biphenyl contaminated materials.

GENERATOR:	CHILKOOT LUMBER COMPANY
MANIFEST #:	001364531JJK
LINE ITEM:	27b.5
PROFILE #:	OR300428
CWM TRACKING ID:	400321-04
RECEIVED DATE:	12/23/08
DISPOSAL METHOD:	INCINERATION

DRUM #(S)	DISPOSAL DATE	DISPOSAL LOCATION
D65	1/22/09	VEOLIA ES TECHNICAL SOLUTIONS, TXD000838896
D66	1/22/09	VEOLIA ES TECHNICAL SOLUTIONS, TXD000838896
D67	1/22/09	VEOLIA ES TECHNICAL SOLUTIONS, TXD000838896
D68	1/22/09	VEOLIA ES TECHNICAL SOLUTIONS, TXD000838896
D69	1/22/09	VEOLIA ES TECHNICAL SOLUTIONS, TXD000838896
D70	1/22/09	VEOLIA ES TECHNICAL SOLUTIONS, TXD000838896

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615) I certify that the information contained in or accompanying this document is true, accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate and complete.

Becky Sumner

CWMNW RECORDS DEPARTMENT
Date 4/27/09

WASTE MANAGEMENT

CHEMICAL WASTE MANAGEMENT OF THE NW
17629 Cedar Springs Lane
Arlington, OR 97812
(541) 454-2643
(541) 454-3279 Fax

CHILKOOT LUMBER CO
AKW000202895
5 MILE LUTAK HWY
HAINES AK 99827

June 26, 2009

CONTACT: Jacklynn

LOAD NUMBER: 401203

MANIFEST NUMBER: 001341924JJK

PROFILE NUMBER: OR301056

This letter is to inform you that the above referenced waste was received at CWMNW on 02/13/09 and placed into our storage area pending shipment to an offsite incinerator. The waste must be shipped to the incinerator no later that 02/13/10. The incinerator then has one year to destroy the waste. Upon completion of this process, we will send a Certificate of Disposal to your facility indicating the waste has been destroyed.

If you have any questions please feel free to contact the records department .

Sincerely,

Becky Sumner

Becky Sumner
Compliance Clerk
CWMNW
Federal EPA ID No.: ORD089452353
Phone No.: 541-454-3243
Fax No.: 541-454-3279
E-mail: bsumner@wm.com

WASTE MANAGEMENT

CHEMICAL WASTE MANAGEMENT OF THE NW
17629 Cedar Springs Lane
Arlington, OR 97812
(541) 454-2643
(541) 454-3279 Fax

CHILKOOT LUMBER CO
AKW000202895
5 MILE LUTAK HWY
HAINES AK 99827

June 29, 2009

CONTACT: Jacklynn Ruggirello

LOAD NUMBER: 400138-07

MANIFEST NUMBER: 001364529JJK

PROFILE NUMBER: OR300436

This letter is to inform you that the above referenced waste was received at CWMNW on 12/08/08 and placed into our storage area pending shipment to an offsite incinerator. The waste must be shipped to the incinerator no later that 12/23/09. The incinerator then has one year to destroy the waste. Upon completion of this process, we will send a Certificate of Disposal to your facility indicating the waste has been destroyed.

If you have any questions please feel free to contact the records department .

Sincerely,

Becky Sumner

Becky Sumner
Compliance Clerk
CWMNW
Federal EPA ID No.: ORD089452353
Phone No.: 541-454-3243
Fax No.: 541-454-3279
E-mail: bsumner@wm.com

Attachment M:
Test America Report 5.26.09

TestAmerica
THE LEADER IN ENVIRONMENTAL TESTING

SEATTLE, WA 11720 NORTH CREEK PKWY N, SUITE 400
BOTHELL, WA 98011-8244
PH: (425) 420.9200 FAX: (425) 420.9210

May 26, 2009

Chilkat Environmental
Chilkat Environmental
P.O. Box 895
Haines, AK 99827

RE: Chilkoot Lumber Company

Enclosed are the results of analyses for samples received by the laboratory on 05/11/09 13:50. The following list is a summary of the Work Orders contained in this report, generated on 05/26/09 18:08.

If you have any questions concerning this report, please feel free to contact me.

Work Order	Project	ProjectNumber
BSE0106	Chilkoot Lumber Company	88087500

TestAmerica Seattle

Curtis D. Armstrong, Project Manager

TestAmerica
THE LEADER IN ENVIRONMENTAL TESTING

SEATTLE, WA 11720 NORTH CREEK PKWY N, SUITE 400
BOTHELL, WA 98011-8244
PH: (425) 420.9200 FAX: (425) 420.9210

Chilkat Environmental	Project Name:	**Chilkoot Lumber Company**	
P.O. Box 895	Project Number:	88087500	Report Created:
Haines, AK 99827	Project Manager:	Chilkat Environmental	05/26/09 18:08

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
C-1	BSE0106-01	Other dry	05/07/09 15:24	05/11/09 13:50
C-2	BSE0106-02	Other dry	05/07/09 15:35	05/11/09 13:50
C-2a	BSE0106-03	Other dry	05/07/09 15:39	05/11/09 13:50
C-3	BSE0106-04	Soil	05/07/09 15:48	05/11/09 13:50
C-3a	BSE0106-05	Soil	05/07/09 15:48	05/11/09 13:50

TestAmerica Seattle

Curtis D. Armstrong, Project Manager

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SEATTLE, WA 11720 NORTH CREEK PKWY N, SUITE 400
BOTHELL, WA 98011-8244
PH: (425) 420.9200 FAX: (425) 420.9210

Chilkat Environmental	Project Name:	**Chilkoot Lumber Company**	
P.O. Box 895	Project Number:	88087500	Report Created:
Haines, AK 99827	Project Manager:	Chilkat Environmental	05/26/09 18:08

Polychlorinated Biphenyls by EPA Method 8082

TestAmerica Seattle

Analyte	Method	Result	MDL*	MRL	Units	Dil	Batch	Prepared	Analyzed	Notes
BSE0106-01 (C-1)		**Other dry**			**Sampled: 05/07/09 15:24**					
Aroclor 1016	EPA 8082	ND	-----	25.9	ug/kg dry	1x	9E13020	05/13/09 11:41	05/19/09 15:40	
Aroclor 1221	"	ND	-----	51.7	"	"	"	"	"	
Aroclor 1232	"	ND	-----	25.9	"	"	"	"	"	
Aroclor 1242	"	ND	-----	25.9	"	"	"	"	"	
Aroclor 1248	"	ND	-----	25.9	"	"	"	"	"	
Aroclor 1254	"	ND	-----	25.9	"	"	"	"	"	
Aroclor 1260	"	ND	-----	25.9	"	"	"	"	"	
Aroclor 1262	"	ND	-----	25.9	"	"	"	"	"	
Aroclor 1268	"	ND	-----	25.9	"	"	"	"	"	
Surrogate(s): TCX		*76.6%*			*53 - 136 %*	"			"	
Decachlorobiphenyl		*90.6%*			*35 - 150 %*	"			"	
BSE0106-02 (C-2)		**Other dry**			**Sampled: 05/07/09 15:35**					
Aroclor 1016	EPA 8082	ND	-----	26.4	ug/kg dry	1x	9E13020	05/13/09 11:41	05/19/09 15:57	
Aroclor 1221	"	ND	-----	52.9	"	"	"	"	"	
Aroclor 1232	"	ND	-----	26.4	"	"	"	"	"	
Aroclor 1242	"	ND	-----	26.4	"	"	"	"	"	
Aroclor 1248	"	ND	-----	26.4	"	"	"	"	"	
Aroclor 1254	"	ND	-----	26.4	"	"	"	"	"	
Aroclor 1260	"	**31.7**	-----	26.4	"	"	"	"	"	
Aroclor 1262	"	ND	-----	26.4	"	"	"	"	"	
Aroclor 1268	"	ND	-----	26.4	"	"	"	"	"	
Surrogate(s): TCX		*66.7%*			*53 - 136 %*	"			"	
Decachlorobiphenyl		*77.7%*			*35 - 150 %*	"			"	
BSE0106-03 (C-2a)		**Other dry**			**Sampled: 05/07/09 15:39**					
Aroclor 1016	EPA 8082	ND	-----	26.0	ug/kg dry	1x	9E13020	05/13/09 11:41	05/19/09 16:13	
Aroclor 1221	"	ND	-----	52.0	"	"	"	"	"	
Aroclor 1232	"	ND	-----	26.0	"	"	"	"	"	
Aroclor 1242	"	ND	-----	26.0	"	"	"	"	"	
Aroclor 1248	"	ND	-----	26.0	"	"	"	"	"	
Aroclor 1254	"	ND	-----	26.0	"	"	"	"	"	
Aroclor 1260	"	**27.6**	-----	26.0	"	"	"	"	"	
Aroclor 1262	"	ND	-----	26.0	"	"	"	"	"	
Aroclor 1268	"	ND	-----	26.0	"	"	"	"	"	
Surrogate(s): TCX		*64.1%*			*53 - 136 %*	"			"	
Decachlorobiphenyl		*73.5%*			*35 - 150 %*	"			"	

TestAmerica Seattle

Curtis D. Armstrong, Project Manager

TestAmerica
THE LEADER IN ENVIRONMENTAL TESTING

SEATTLE, WA 11720 NORTH CREEK PKWY N, SUITE 400
BOTHELL, WA 98011-8244
PH: (425) 420.9200 FAX: (425) 420.9210

Chilkat Environmental	Project Name:	**Chilkoot Lumber Company**	
P.O. Box 895	Project Number:	88087500	Report Created:
Haines, AK 99827	Project Manager:	Chilkat Environmental	05/26/09 18:08

Polychlorinated Biphenyls by EPA Method 8082

TestAmerica Seattle

Analyte	Method	Result	MDL*	MRL	Units	Dil	Batch	Prepared	Analyzed	Notes
BSE0106-04 (C-3)		**Soil**			**Sampled: 05/07/09 15:48**					
Aroclor 1016	EPA 8082	ND	-----	29.3	ug/kg dry	1x	9E13020	05/13/09 11:41	05/19/09 16:29	
Aroclor 1221	"	ND	-----	58.5	"	"	"	"	"	
Aroclor 1232	"	ND	-----	29.3	"	"	"	"	"	
Aroclor 1242	"	**84.1**	-----	29.3	"	"	"	"	"	
Aroclor 1248	"	ND	-----	29.3	"	"	"	"	"	
Aroclor 1254	"	ND	-----	29.3	"	"	"	"	"	
Aroclor 1260	"	ND	-----	29.3	"	"	"	"	"	
Aroclor 1262	"	ND	-----	29.3	"	"	"	"	"	
Aroclor 1268	"	ND	-----	29.3	"	"	"	"	"	
Surrogate(s): TCX		*65.3%*			*53 - 136 %*	"			"	
Decachlorobiphenyl		*67.3%*			*35 - 150 %*	"			"	
BSE0106-05 (C-3a)		**Soil**			**Sampled: 05/07/09 15:48**					
Aroclor 1016	EPA 8082	ND	-----	32.0	ug/kg dry	1x	9E13020	05/13/09 11:41	05/19/09 16:46	
Aroclor 1221	"	ND	-----	63.9	"	"	"	"	"	
Aroclor 1232	"	ND	-----	32.0	"	"	"	"	"	
Aroclor 1242	"	**62.6**	-----	32.0	"	"	"	"	"	
Aroclor 1248	"	ND	-----	32.0	"	"	"	"	"	
Aroclor 1254	"	ND	-----	32.0	"	"	"	"	"	
Aroclor 1260	"	ND	-----	32.0	"	"	"	"	"	
Aroclor 1262	"	ND	-----	32.0	"	"	"	"	"	
Aroclor 1268	"	ND	-----	32.0	"	"	"	"	"	
Surrogate(s): TCX		*57.3%*			*53 - 136 %*	"			"	
Decachlorobiphenyl		*57.1%*			*35 - 150 %*	"			"	

TestAmerica Seattle

Curtis D. Armstrong, Project Manager

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SEATTLE, WA 11720 NORTH CREEK PKWY N, SUITE 400
BOTHELL, WA 98011-8244
PH: (425) 420.9200 FAX: (425) 420.9210

Chilkat Environmental	Project Name:	**Chilkoot Lumber Company**	
P.O. Box 895	Project Number:	88087500	Report Created:
Haines, AK 99827	Project Manager:	Chilkat Environmental	05/26/09 18:08

Physical Parameters by APHA/ASTM/EPA Methods

TestAmerica Seattle

Analyte	Method	Result	MDL*	MRL	Units	Dil	Batch	Prepared	Analyzed	Notes
BSE0106-01 (C-1)		**Other dry**				**Sampled: 05/07/09 15:24**				
Dry Weight	BSOPSPL003R08	**95.4**	-----	1.00	%	1x	9E14030	05/14/09 12:34	05/15/09 00:00	
BSE0106-02 (C-2)		**Other dry**				**Sampled: 05/07/09 15:35**				
Dry Weight	BSOPSPL003R08	**93.6**	-----	1.00	%	1x	9E14030	05/14/09 12:34	05/15/09 00:00	
BSE0106-03 (C-2a)		**Other dry**				**Sampled: 05/07/09 15:39**				
Dry Weight	BSOPSPL003R08	**94.6**	-----	1.00	%	1x	9E14030	05/14/09 12:34	05/15/09 00:00	
BSE0106-04 (C-3)		**Soil**				**Sampled: 05/07/09 15:48**				
Dry Weight	BSOPSPL003R08	**84.9**	-----	1.00	%	1x	9E14030	05/14/09 12:34	05/15/09 00:00	
BSE0106-05 (C-3a)		**Soil**				**Sampled: 05/07/09 15:48**				
Dry Weight	BSOPSPL003R08	**77.7**	-----	1.00	%	1x	9E14030	05/14/09 12:34	05/15/09 00:00	

TestAmerica Seattle

Curtis D. Armstrong, Project Manager

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SEATTLE, WA 11720 NORTH CREEK PKWY N, SUITE 400
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PH: (425) 420.9200 FAX: (425) 420.9210

Chilkat Environmental	Project Name:	**Chilkoot Lumber Company**	
P.O. Box 895	Project Number:	88087500	Report Created:
Haines, AK 99827	Project Manager:	Chilkat Environmental	05/26/09 18:08

Polychlorinated Biphenyls by EPA Method 8082 - Laboratory Quality Control Results

TestAmerica Seattle

QC Batch: 9E13020 **Soil Preparation Method: EPA 3550B**

Analyte	Method	Result	MDL*	MRL	Units	Dil	Source Result	Spike Amt	% REC	(Limits)	% RPD	(Limits)	Analyzed	Notes
Blank (9E13020-BLK1)									**Extracted: 05/13/09 11:41**					
Aroclor 1016	EPA 8082	ND	---	25.0	ug/kg wet	1x	--	--	--	--	--	--	05/19/09 14:35	
Aroclor 1221	"	ND	---	50.0	"	"	--	--	--	--	--	--	"	
Aroclor 1232	"	ND	---	25.0	"	"	--	--	--	--	--	--	"	
Aroclor 1242	"	ND	---	25.0	"	"	--	--	--	--	--	--	"	
Aroclor 1248	"	ND	---	25.0	"	"	--	--	--	--	--	--	"	
Aroclor 1254	"	ND	---	25.0	"	"	--	--	--	--	--	--	"	
Aroclor 1260	"	ND	---	25.0	"	"	--	--	--	--	--	--	"	
Aroclor 1262	"	ND	---	25.0	"	"	--	--	--	--	--	--	"	
Aroclor 1268	"	ND	---	25.0	"	"	--	--	--	--	--	--	"	
Surrogate(s): TCX		*Recovery: 115%*			*Limits: 53-136%*	"							*05/19/09 14:35*	
Decachlorobiphenyl		*128%*			*35-150%*	"							"	
LCS (9E13020-BS1)									**Extracted: 05/13/09 11:41**					
Aroclor 1016	EPA 8082	82.5	---	25.0	ug/kg wet	1x	--	83.3	99.0%	(76-124)	--	--	05/19/09 14:52	
Aroclor 1260	"	84.4	---	25.0	"	"	--	"	101%	(67-124)	--	--	"	
Surrogate(s): TCX		*Recovery: 114%*			*Limits: 53-136%*	"							*05/19/09 14:52*	
Decachlorobiphenyl		*124%*			*35-150%*	"							"	
Matrix Spike (9E13020-MS1)					**QC Source: BSE0112-03**				**Extracted: 05/13/09 11:41**					
Aroclor 1016	EPA 8082	85.9	---	26.5	ug/kg dry	1x	ND	88.2	97.4%	(65-135)	--	--	05/19/09 15:08	
Aroclor 1260	"	91.1	---	26.5	"	"	ND	"	103%	(50-135)	--	--	"	
Surrogate(s): TCX		*Recovery: 115%*			*Limits: 53-136%*	"							*05/19/09 15:08*	
Decachlorobiphenyl		*124%*			*35-150%*	"							"	
Matrix Spike Dup (9E13020-MSD1)					**QC Source: BSE0112-03**				**Extracted: 05/13/09 11:41**					
Aroclor 1016	EPA 8082	87.7	---	26.4	ug/kg dry	1x	ND	87.9	99.7%	(65-135)	2.03%	(31)	05/19/09 15:24	
Aroclor 1260	"	92.0	---	26.4	"	"	ND	"	105%	(50-135)	0.990%	"	"	
Surrogate(s): TCX		*Recovery: 117%*			*Limits: 53-136%*	"							*05/19/09 15:24*	
Decachlorobiphenyl		*127%*			*35-150%*	"							"	

TestAmerica Seattle

Curtis D. Armstrong, Project Manager

TestAmerica
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SEATTLE, WA 11720 NORTH CREEK PKWY N, SUITE 400
BOTHELL, WA 98011-8244
PH: (425) 420.9200 FAX: (425) 420.9210

Chilkat Environmental	Project Name:	**Chilkoot Lumber Company**	
P.O. Box 895	Project Number:	88087500	Report Created:
Haines, AK 99827	Project Manager:	Chilkat Environmental	05/26/09 18:08

Physical Parameters by APHA/ASTM/EPA Methods - Laboratory Quality Control Results

TestAmerica Seattle

QC Batch: 9E14030 **Soil Preparation Method: Dry Weight**

Analyte	Method	Result	MDL*	MRL	Units	Dil	Source Result	Spike Amt	% REC	(Limits)	% RPD	(Limits)	Analyzed	Notes
Blank (9E14030-BLK1)							**Extracted: 05/14/09 12:34**							
Dry Weight	BSOPSPL00 3R08	100	---	1.00	%	1x	--	--	--	--	--	--	05/15/09 00:00	

TestAmerica Seattle

Curtis D. Armstrong, Project Manager

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P.O. Box 895	Project Number:	88087500	Report Created:
Haines, AK 99827	Project Manager:	Chilkat Environmental	05/26/09 18:08

CERTIFICATION SUMMARY

TestAmerica Seattle

Method	Matrix	Nelac	Alaska
BSOPSPL003R08	Other dry		
BSOPSPL003R08	Soil		
EPA 8082	Other dry	X	X
EPA 8082	Soil	X	X

Any abnormalities or departures from sample acceptance policy shall be documented on the 'Sample Receipt and Temperature Log Form' and 'Sample Non-conformance Form' (if applicable) included with this report.

For information concerning certifications of this facility or another TestAmerica facility, please visit our website at www.TestAmericaInc.com

Samples collected by TestAmerica Field Services personnel are noted on the Chain of Custody (COC) .

TestAmerica Seattle

Curtis D. Armstrong, Project Manager

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P.O. Box 895	Project Number:	88087500	Report Created:
Haines, AK 99827	Project Manager:	Chilkat Environmental	05/26/09 18:08

Notes and Definitions

Report Specific Notes:

None

Laboratory Reporting Conventions:

DET	-	Analyte DETECTED at or above the Reporting Limit. Qualitative Analyses only.
ND	-	Analyte NOT DETECTED at or above the reporting limit (MDL or MRL, as appropriate).
NR/NA	-	Not Reported / Not Available
dry	-	Sample results reported on a Dry Weight Basis. Results and Reporting Limits have been corrected for Percent Dry Weight.
wet	-	Sample results and reporting limits reported on a Wet Weight Basis (as received). Results with neither 'wet' nor 'dry' are reported on a Wet Weight Basis.
RPD	-	RELATIVE PERCENT DIFFERENCE (RPDs calculated using Results, not Percent Recoveries).
MRL	-	METHOD REPORTING LIMIT. Reporting Level at, or above, the lowest level standard of the Calibration Table.
MDL*	-	METHOD DETECTION LIMIT. Reporting Level at, or above, the statistically derived limit based on 40CFR, Part 136, Appendix B. *MDLs are listed on the report only if the data has been evaluated below the MRL. Results between the MDL and MRL are reported as Estimated Results.
Dil	-	Dilutions are calculated based on deviations from the standard dilution performed for an analysis, and may not represent the dilution found on the analytical raw data.
Reporting Limits	-	Reporting limits (MDLs and MRLs) are adjusted based on variations in sample preparation amounts, analytical dilutions and percent solids, where applicable.
Electronic Signature	-	Electronic Signature added in accordance with TestAmerica's *Electronic Reporting and Electronic Signatures Policy.* Application of electronic signature indicates that the report has been reviewed and approved for release by the laboratory. Electronic signature is intended to be the legally binding equivalent of a traditionally handwritten signature.

TestAmerica Seattle

Curtis D. Armstrong, Project Manager

TestAmerica

THE LEADER IN ENVIRONMENTAL TESTING

11720 North Creek Pkwy N Suite 400, Bothell, WA 98011-8244 425-420-9200 FAX 420-9210 ☑
11922 E. First Ave, Spokane, WA 99206-5302 509-924-9200 FAX 924-9290
9405 SW Nimbus Ave,Beaverton, OR 97008-7145 503-906-9200 FAX 906-9210
2000 W International Airport Rd Ste A10, Anchorage, AK 99502-1119 907-563-9200 FAX 563-9210

CHAIN OF CUSTODY REPORT

Work Order #: BSEC106

CLIENT: Chilkat Environmental

REPORT TO: PO Box 865
ADDRESS: Haines AK 99827

PHONE: 9077663897 ~~FAX~~ email chilkat@chilkatenvironmental.com

INVOICE TO: Chilkat Environmental
Box 865
Haines AK 99827

P.O. NUMBER:

PROJECT NAME: Chilkoot Lumber Company

PROJECT NUMBER:

SAMPLED BY: Prisciandaro

TURNAROUND REQUEST
in Business Days *

Organic & Inorganic Analyses: 10 STD. | 7 | 5 | 4 | 3 | 2 | 1 | <1

Petroleum Hydrocarbon Analyses: 5 STD. | 4 | 3 | 2 | 1 | <1

OTHER Specify: Standard

* Turnaround Requests less than standard may incur Rush Charges.

	CLIENT SAMPLE IDENTIFICATION	SAMPLING DATE/TIME	PRESERVATIVE	REQUESTED ANALYSES: 8082	MATRIX (W, S, O)	# OF CONT.	LOCATION/ COMMENTS	TA WO ID
1	C-1	5/7/09 1524		X	other	1	Concrete	-01
2	C-2	5/7/09 1535		X	other	1	Concrete	-02
3	C-2a	5/7/09 1539		X	other	1	Concrete	-03
4	C-3	5/7/09 1548		X	S	1		-04
5	C-3a	5/7/09 1548		X	S	1		-05
6								
7								
8								
9								
10								

RELEASED BY: William Prisciandaro	DATE: 5/7/09	RECEIVED BY: Colette Weaver	DATE: 05-11-09
PRINT NAME: Wade R A	FIRM: Chilkat Environmental TIME: 1645	PRINT NAME: Colette Weaver	FIRM: TAL-Seattle TIME: 1350
RELEASED BY:	DATE:	RECEIVED BY:	DATE:
PRINT NAME:	FIRM: TIME:	PRINT NAME:	FIRM: TIME:

ADDITIONAL REMARKS:

TEMP: 2.2C W/ICE

PAGE OF

TAL-1000(0408)

TAT: _____ Paperwork to PM – Date:_____ Time:_____ Non-Conformances?

Page Time & Initials:_____ Circle Y or (N)

(If Y, see other side)

TEST AMERICA SAMPLE RECEIPT CHECKLIST

Received By: (applies to temp at receipt)
Date: 05\1\09
Time: 1350
Initials: CW

Logged-in By:
Date: 05-11-09
Time: 1611
Initials: CW

Unpacked/Labeled By:
Date: 5/12
Time: Cl
Initials: 11:55

Cooler ID: 384

Work Order No. BSE0106
Client: _____
Project: _____

Container Type:
X Cooler
___ Box
___ None/Other _____

COC Seals: ?
X Ship Container ___ Sign By
___ On Bottles 050709 Date
___ None

Packing Material:
X Bubble Bags ___ Styrofoam
___ Foam Packs
X None/(Other) bubble wrap

Refrigerant:
X Gel Ice Pack _____
___ Loose Ice _____
___ None/Other _____

Soil Stir Bars/Encores:
Placed in freezer #46:
Y or N or (NA)
Initial/date/time_____

Received Via: Bill#: 73032536
___ Fed Ex ___ Client
___ UPS ___ TA Courier
___ DHL ___ Mid Valley
___ Senvoy ___ TDP
X GS X Other Sonya Palmer

Cooler Temperature (*IR*): ____°C Plastic Glass (Frozen filters, Tedlars and aqueous Metals exempt)
(circle one)

Temperature Blank? 22 °C or NA comments _____ Trip Blank? Y or N or (NA)

BP, OPLC,ARCO-Temperature monitoring every 15 minutes:
(initial/date/time):_____
Comments:_____

Sample Containers:		ID			ID
Intact?	(Y) or N	_____	Metals Preserved?	Y or N or (NA)	_____
Provided by TA?	(Y) or N	_____	Client QAPP Preserved?	Y or N or (NA)	_____
Correct Type?	(Y) or N	_____	Adequate Volume? (for tests requested)	(Y) or N	_____
#Containers match COC?	(Y) or N	_____	Water VOAs: Headspace?	Y or N or (NA)	_____
IDs/time/date match COC?	(Y) or N	_____	Comments:		
Hold Times in hold?	(Y) or N	_____			

PROJECT MANAGEMENT

Is the Chain of Custody complete? Y or N If N, circle the items that were incomplete

Comments,Problems_____

_____

_____

_____

Total access set up? Y or N
Has client been contacted regarding non-conformances? Y or N If Y, ____/____ Date Time

PM Initials: _____ Date: _____ Time: _____

(rev 5, 03/04/09)

Attachment N:
Friedman and Bruya Report 6.11.09

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

James E. Bruya, Ph.D.
Charlene Morrow, M.S.
Yelena Aravkina, M.S.
Bradley T. Benson, B.S.
Kurt Johnson, B.S.

3012 16th Avenue West
Seattle, WA 98119-2029
TEL: (206) 285-8282
FAX: (206) 283-5044
e-mail: fbi@isomedia.com

June 15, 2009

Elijah Donat, Project Manager
Chilkat Environmental
223 Old Hart St.
Haines, AK 99827

Dear Mr. Donat:

Included is the amended case narrative from the testing from the testing of material submitted on June 1, 2009 from the Chilkoot Lumber Company, F&BI 906002 project. The case narrative has been corrected to the Alaska format.

We apologize for the inconvenience and hope you will call if you should have any questions.

Sincerely,

FRIEDMAN & BRUYA, INC.

Michael Erdahl
Project Manager

Enclosures
NAA0611R.DOC

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

James E. Bruya, Ph.D.
Charlene Morrow, M.S.
Yelena Aravkina, M.S.
Bradley T. Benson, B.S.
Kurt Johnson, B.S.

3012 16th Avenue West
Seattle, WA 98119-2029
TEL: (206) 285-8282
FAX: (206) 283-5044
e-mail: fbi@isomedia.com

June 11, 2009

Elijah Donat, Project Manager
Chilkat Environmental
223 Old Hart St.
Haines, AK 99827

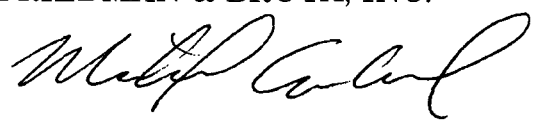
Dear Mr. Donat:

Included are the results from the testing of material submitted on June 1, 2009 from the Chilkoot Lumber Company, F&BI 906002 project. There are 14 pages included in this report. Any samples that may remain are currently scheduled for disposal in 30 days. If you would like us to return your samples or arrange for long term storage at our offices, please contact us as soon as possible.

We appreciate this opportunity to be of service to you and hope you will call if you should have any questions.

Sincerely,

FRIEDMAN & BRUYA, INC.



Michael Erdahl
Project Manager

Enclosures
NAA0611R.DOC

CASE NARRATIVE

This case narrative encompasses samples received on June 1, 2009 by Friedman & Bruya, Inc. (ADEC laboratory approval number UST-007) from the Chilkat Environmental Chilkoot Lumber Company, F&BI 906002 project. The samples were received at 0 °C in good condition and were refrigerated upon receipt. Samples were logged in under the laboratory ID's listed below.

Laboratory ID	Chilkat Environmental	Date Sampled
906002-01	34M-1	05/29/09
906002-02	34M-2	05/29/09
906002-03	34M-3	05/29/09
906002-04	34M-4	05/29/09
906002-05	34M-5	05/29/09
906002-06	34M-6	05/29/09
906002-07	34M-7	05/29/09
906002-08	34M-8	05/29/09
906002-09	34M-9	05/29/09
906002-10	34M-9a	05/29/09
906002-11	34M-10	05/29/09
906002-12	34M-11	05/29/09
906002-13	34M-12	05/29/09
906002-14	34M-13	05/29/09
906002-15	34M-14	05/29/09
906002-16	34M-15	05/29/09
906002-17	34M-16	05/29/09
906002-18	4a	05/29/09
906002-19	4b	05/29/09
906002-20	5	05/29/09
906002-21	6	05/29/09

The samples were analyzed as follows.

DRO/RRO (soil) - Analysis Method AK 102/AK 103, Extraction Method 3550B

All quality control requirements were acceptable.

PCBs (soil) - Analysis Method 8082A, Extraction Method 3550B

All quality control requirements were acceptable.

Date of Report: 06/11/09
Date Received: 06/01/09
Project: Chilkoot Lumber Company, F&BI 906002
Date Extracted: 06/01/09
Date Analyzed: 06/01/09 and 06/02/09

RESULTS FROM THE ANALYSIS OF THE SOIL SAMPLES FOR TOTAL PETROLEUM HYDROCARBONS AS DIESEL USING METHOD AK 102

Results Reported on a Dry Weight Basis
Results Reported as mg/kg (ppm)

Sample ID Laboratory ID	Diesel Range (C_{10}-C_{25})	Surrogate (% Recovery) (Limit 50-150)
34M-1 906002-01	1,200	108
34M-2 906002-02	2,500	79
34M-3 906002-03	1,300	99
34M-5 906002-05	1,600	107
34M-6 906002-06	2,300	105
34M-9 906002-09	2,000	99
34M-9a 906002-10	1,900	101
34M-10 906002-11	2,400	100
34M-11 906002-12	1,500	100
34M-13 906002-14	2,000	87
34M-14 906002-15	2,500	128

Date of Report: 06/11/09
Date Received: 06/01/09
Project: Chilkoot Lumber Company, F&BI 906002
Date Extracted: 06/01/09
Date Analyzed: 06/01/09 and 06/02/09

RESULTS FROM THE ANALYSIS OF THE SOIL SAMPLES FOR TOTAL PETROLEUM HYDROCARBONS AS DIESEL USING METHOD AK 102

Results Reported on a Dry Weight Basis
Results Reported as mg/kg (ppm)

Sample ID Laboratory ID	Diesel Range (C_{10}-C_{25})	Surrogate (% Recovery) (Limit 50-150)
34M-15 906002-16	980	100
Method Blank	<10	92

Date of Report: 06/11/09
Date Received: 06/01/09
Project: Chilkoot Lumber Company, F&BI 906002
Date Extracted: 06/01/09
Date Analyzed: 06/02/09

RESULTS FROM THE ANALYSIS OF THE SOIL SAMPLES FOR TOTAL PETROLEUM HYDROCARBONS AS DIESEL USING METHOD AK 102
Sample Extracts Passed Through a Silica Gel Column Prior to Analysis
Results Reported on a Dry Weight Basis
Results Reported as mg/kg (ppm)

Sample ID Laboratory ID	Diesel Range (C_{10}-C_{25})	Surrogate (% Recovery) (Limit 50-150)
34M-4 906002-04	780	107
34M-7 906002-07	950	109
34M-8 906002-08	270	112
34M-12 906002-13	520	103
34M-16 906002-17	680	112
Method Blank	<10	103

Date of Report: 06/11/09
Date Received: 06/01/09
Project: Chilkoot Lumber Company, F&BI 906002
Date Extracted: 06/01/09
Date Analyzed: 06/04/09 and 06/09/09

RESULTS FROM THE ANALYSIS OF THE SOIL SAMPLES FOR TOTAL PETROLEUM HYDROCARBONS AS MOTOR OIL USING METHOD AK 103

Results Reported on a Dry Weight Basis
Results Reported as mg/kg (ppm)

Sample ID Laboratory ID	Motor Oil Range (C_{25}-C_{36})	Surrogate (% Recovery) (Limit 50-150)
34M-1 d 906002-01 1/10	3,300	83
34M-2 d 906002-02 1/10	7,300	63
34M-3 d 906002-03 1/10	3,900	125
34M-5 d 906002-05 1/10	4,000	81
34M-6 d 906002-06 1/10	7,900	ip
34M-9 d 906002-09 1/10	6,700	95
34M-9a d 906002-10 1/10	5,800	109
34M-10 d 906002-11 1/10	6,700	ip
34M-11 d 906002-12 1/10	5,000	130
34M-13 d 906002-14 1/10	6,100	ip

Date of Report: 06/11/09
Date Received: 06/01/09
Project: Chilkoot Lumber Company, F&BI 906002
Date Extracted: 06/01/09
Date Analyzed: 06/04/09 and 06/09/09

RESULTS FROM THE ANALYSIS OF THE SOIL SAMPLES FOR TOTAL PETROLEUM HYDROCARBONS AS MOTOR OIL USING METHOD AK 103

Results Reported on a Dry Weight Basis
Results Reported as mg/kg (ppm)

Sample ID Laboratory ID	Motor Oil Range (C_{25}-C_{36})	Surrogate (% Recovery) (Limit 50-150)
34M-14 d 906002-15 1/10	7,200	ip
34M-15 d 906002-16 1/10	3,000	ip
Method Blank	<50	104

Date of Report: 06/11/09
Date Received: 06/01/09
Project: Chilkoot Lumber Company, F&BI 906002
Date Extracted: 0601/09
Date Analyzed: 06/02/09 and 06/09/09

RESULTS FROM THE ANALYSIS OF THE SOIL SAMPLES FOR TOTAL PETROLEUM HYDROCARBONS AS MOTOR OIL USING METHOD AK 103
Sample Extracts Passed Through a Silica Gel Column Prior to Analysis
Results Reported on a Dry Weight Basis
Results Reported as mg/kg (ppm)

Sample ID Laboratory ID	Motor Oil Range (C_{25}-C_{36})	Surrogate (% Recovery) (Limit 50-150)
34M-4 d 906002-04 1/10	2,600	104
34M-7 d 906002-07 1/10	3,000	93
34M-8 906002-08	970	140
34M-12 906002-13	1,700	106
34M-16 d 906002-17 1/10	2,400	92
Method Blank	<50	93

Date of Report: 06/11/09
Date Received: 06/01/09
Project: Chilkoot Lumber Company, F&BI 906002
Date Extracted: 06/01/09
Date Analyzed: 06/03/09

RESULTS FROM THE ANALYSIS OF SOIL SAMPLES FOR PCBs REPORTED AS AROCLORS USING EPA METHOD 8082A

Results Reported on a Dry Weight Basis
Results Reported as mg/kg (ppm)

Sample ID Laboratory ID	Aroclor 1221	1232	1016	1242	1248	1254	1260	Surrogate (% Rec.) (Limit 50-150)
4a 906002-18	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	110
4b 906002-19	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	110
5 906002-20	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	104
6 906002-21	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	104
Method Blank	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	105

Date of Report: 06/11/09
Date Received: 06/01/09
Project: Chilkoot Lumber Company, F&BI 906002

QUALITY ASSURANCE RESULTS FROM THE ANALYSIS OF SOIL SAMPLES FOR TOTAL PETROLEUM HYDROCARBONS AS DIESEL USING METHOD AK 102

Laboratory Code: 906002-03 (Matrix Spike)

Analyte	Reporting Units	Spike Level	(Wet wt) Sample Result	Percent Recovery MS	Acceptance Criteria
Diesel	mg/kg (ppm)	500	1,200	117	60-140

Laboratory Code: Laboratory Control Sample

Analyte	Reporting Units	Spike Level	Percent Recovery LCS	Percent Recovery LCSD	Acceptance Criteria	RPD (Limit 20)
Diesel	mg/kg (ppm)	500	104	95	75-125	9

Date of Report: 06/11/09
Date Received: 06/01/09
Project: Chilkoot Lumber Company, F&BI 906002

QUALITY ASSURANCE RESULTS FROM THE ANALYSIS OF SOIL SAMPLES FOR TOTAL PETROLEUM HYDROCARBONS AS DIESEL USING METHOD AK 102

Laboratory Code: 906002-03 (Matrix Spike) Silica Gel

Analyte	Reporting Units	Spike Level	(Wet wt) Sample Result	Percent Recovery MS	Acceptance Criteria
Diesel	mg/kg (ppm)	500	1,900	137	60-140

Laboratory Code: Laboratory Control Sample Silica Gel

Analyte	Reporting Units	Spike Level	Percent Recovery LCS	Percent Recovery LCSD	Acceptance Criteria	RPD (Limit 20)
Diesel	mg/kg (ppm)	500	122	116	75-125	5

Date of Report: 06/11/09
Date Received: 06/01/09
Project: Chilkoot Lumber Company, F&BI 906002

QUALITY ASSURANCE RESULTS FROM THE ANALYSIS OF SOIL SAMPLES FOR TOTAL PETROLEUM HYDROCARBONS AS MOTOR OIL USING METHOD AK 103

Laboratory Code: 906002-03 (Matrix Spike)

Analyte	Reporting Units	Spike Level	(Wet wt) Sample Result	Percent Recovery MS	Acceptance Criteria
Motor Oil	mg/kg (ppm)	500	1,700	41 b	60-140

Laboratory Code: Laboratory Control Sample

Analyte	Reporting Units	Spike Level	Percent Recovery LCS	Percent Recovery LCSD	Acceptance Criteria	RPD (Limit 20)
Motor Oil	mg/kg (ppm)	500	83	81	60-120	2

Date of Report: 06/11/09
Date Received: 06/01/09
Project: Chilkoot Lumber Company, F&BI 906002

QUALITY ASSURANCE RESULTS FROM THE ANALYSIS OF SOIL SAMPLES FOR TOTAL PETROLEUM HYDROCARBONS AS MOTOR OIL USING METHOD AK 103

Laboratory Code: 906002-03 (Matrix Spike) Silica Gel

Analyte	Reporting Units	Spike Level	(Wet wt) Sample Result	Percent Recovery MS	Acceptance Criteria
Motor Oil	mg/kg (ppm)	500	2,700	7 b	60-140

Laboratory Code: Laboratory Control Sample Silica Gel

Analyte	Reporting Units	Spike Level	Percent Recovery LCS	Percent Recovery LCSD	Acceptance Criteria	RPD (Limit 20)
Motor Oil	mg/kg (ppm)	500	114	111	60-120	3

Date of Report: 06/11/09
Date Received: 06/01/09
Project: Chilkoot Lumber Company, F&BI 906002

QUALITY ASSURANCE RESULTS FOR THE ANALYSIS OF SOIL SAMPLES FOR POLYCHLORINATED BIPHENYLS AS AROCLOR 1016/1260 BY EPA METHOD 8082A

Laboratory Code: 906002-21 (Duplicate)

Analyte	Reporting Units	Sample Result	Duplicate Result	RPD (Limit 20)
Aroclor 1016	mg/kg (ppm)	<0.1	<0.1	nm
Aroclor 1260	mg/kg (ppm)	<0.1	<0.1	nm

Laboratory Code: Laboratory Control Sample

Analyte	Reporting Units	Spike Level	% Recovery LCS	% Recovery LCSD	Acceptance Criteria	RPD (Limit 20)
Aroclor 1016	mg/kg (ppm)	0.8	100	113	73-135	12
Aroclor 1260	mg/kg (ppm)	0.8	108	114	72-149	5

Data Qualifiers & Definitions

a - The analyte was detected at a level less than five times the reporting limit. The RPD results may not provide reliable information on the variability of the analysis.

A1 – More than one compound of similar molecule structure was identified with equal probability.

b - The analyte was spiked at a level that was less than five times that present in the sample. Matrix spike recoveries may not be meaningful.

ca - The calibration results for this range fell outside of acceptance criteria. The value reported is an estimate.

c - The presence of the analyte indicated may be due to carryover from previous sample injections.

d - The sample was diluted. Detection limits may be raised due to dilution.

ds - The sample was diluted. Detection limits are raised due to dilution and surrogate recoveries may not be meaningful.

dv - Insufficient sample was available to achieve normal reporting limits and limits are raised accordingly.

fb - The analyte indicated was found in the method blank. The result should be considered an estimate.

fc – The compound is a common laboratory and field contaminant.

hr - The sample and duplicate were reextracted and reanalyzed. RPD results were still outside of control limits. The variability is attributed to sample inhomogeneity.

ht - The sample was extracted outside of holding time. Results should be considered estimates.

ip - Recovery fell outside of normal control limits. Compounds in the sample matrix interfered with the quantitation of the analyte.

j – The result is below normal reporting limits. The value reported is an estimate.

J - The internal standard associated with the analyte is out of control limits. The reported concentration is an estimate.

jl - The analyte result in the laboratory control sample is out of control limits. The reported concentration should be considered an estimate.

jr - The rpd result in laboratory control sample associated with the analyte is out of control limits. The reported concentration should be considered an estimate.

js - The surrogate associated with the analyte is out of control limits. The reported concentration should be considered an estimate.

lc - The presence of the compound indicated is likely due to laboratory contamination.

L - The reported concentration was generated from a library search.

nm - The analyte was not detected in one or more of the duplicate analyses. Therefore, calculation of the RPD is not applicable.

pc – The sample was received in a container not approved by the method. The value reported should be considered an estimate.

pr – The sample was received with incorrect preservation. The value reported should be considered an estimate.

ve - The value reported exceeded the calibration range established for the analyte. The reported concentration should be considered an estimate.

vo - The value reported fell outside the control limits established for this analyte.

x - The pattern of peaks present is not indicative of diesel.

y - The pattern of peaks present is not indicative of motor oil.

Laboratory Data Review Checklist

Completed by:

Title:

Date:

CS Report Name: Chilkoot Lumber Company

Report Date: 06/11/09

Consultant Firm: Chilkat Environmental

Laboratory Name: Friedman and Bruya, Inc.

Laboratory Report Number: 906002

ADEC File Number:

ADEC RecKey Number:

1. Laboratory

   a. Did an ADEC CS approved laboratory receive and perform all of the submitted sample analyses?
   ☒ Yes ☐ No Comments:

   b. If the samples were transferred to another "network" laboratory or sub-contracted to an alternate laboratory, was the laboratory performing the analyses ADEC CS approved?
   ☐ Yes ☐ No Comments: N/A

2. Chain of Custody (COC)

   a. COC information completed, signed, and dated (including released/received by)?
   ☒ Yes ☐ No Comments:

   b. Correct analyses requested?
   ☒ Yes ☐ No Comments:

3. Laboratory Sample Receipt Documentation

a. Sample/cooler temperature documented and within range at receipt (4° ± 2° C)?

☒ Yes ☐ No Comments:

b. Sample preservation acceptable – acidified waters, Methanol preserved VOC soil (GRO, BTEX, Volatile Chlorinated Solvents, etc.)?

☐ Yes ☐ No Comments: N/A

c. Sample condition documented – broken, leaking (Methanol), zero headspace (VOC vials)?

☒ Yes ☐ No Comments:

d. If there were any discrepancies, were they documented? For example, incorrect sample containers/preservation, sample temperature outside of acceptable range, insufficient or missing samples, etc.?

☒ Yes ☐ No Comments:

e. Data quality or usability affected? Explain.

Comments: N/A

4. Case Narrative

a. Present and understandable?

☒ Yes ☐ No Comments:

b. Discrepancies, errors or QC failures identified by the lab?

☒ Yes ☐ No Comments:

c. Were all corrective actions documented?

☒ Yes ☐ No Comments:

d. What is the effect on data quality/usability according to the case narrative?

Comments: N/A

5. Samples Results

a. Correct analyses performed/reported as requested on COC?

☒ Yes ☐ No Comments:

b. All applicable holding times met?

☒ Yes ☐ No Comments:

c. All soils reported on a dry weight basis?

☒ Yes ☐ No Comments:

d. Are the reported PQLs less than the Cleanup Level or the minimum required detection level for the project?

☒ Yes ☐ No Comments:

e. Data quality or usability affected?

Comments: N/A

6. QC Samples

a. Method Blank

i. One method blank reported per matrix, analysis and 20 samples?

☒ Yes ☐ No Comments:

ii. All method blank results less than PQL?

☒ Yes ☐ No Comments:

iii. If above PQL, what samples are affected?

Comments: N/A

iv. Do the affected sample(s) have data flags? If so, are the data flags clearly defined?

☐ Yes ☐ No Comments: N/A

v. Data quality or usability affected? Explain.

Comments: N/A

b. Laboratory Control Sample/Duplicate (LCS/LCSD)

i. Organics – One LCS/LCSD reported per matrix, analysis and 20 samples? (LCS/LCSD required per AK methods, LCS required per SW846)

☒ Yes ☐ No Comments:

ii. Metals/Inorganics – one LCS and one sample duplicate reported per matrix, analysis and 20 samples?

☒ Yes ☐ No Comments:

iii. Accuracy – All percent recoveries (%R) reported and within method or laboratory limits? And project specified DQOs, if applicable. (AK Petroleum methods: AK101 60%-120%, AK102 75%-125%, AK103 60%-120%; all other analyses see the laboratory QC pages)

☒ Yes ☐ No Comments:

iv. Precision – All relative percent differences (RPD) reported and less than method or laboratory limits? And project specified DQOs, if applicable. RPD reported from LCS/LCSD, MS/MSD, and or sample/sample duplicate. (AK Petroleum methods 20%; all other analyses see the laboratory QC pages)

☒ Yes ☐ No Comments:

v. If %R or RPD is outside of acceptable limits, what samples are affected?

Comments: N/A

vi. Do the affected sample(s) have data flags? If so, are the data flags clearly defined?

☐ Yes ☐ No Comments: N/A

vii. Data quality or usability affected? (Use comment box to explain)

Comments: N/A

c. Surrogates – Organics Only

i. Are surrogate recoveries reported for organic analyses – field, QC and laboratory samples?

☒ Yes ☐ No Comments:

ii. Accuracy – All percent recoveries (%R) reported and within method or laboratory limits? And project specified DQOs, if applicable. (AK Petroleum methods 50-150 %R; all other analyses see the laboratory report pages)

☐ Yes ☒ No Comments:

AK103 outside of acceptance criteria due to dilution/matrix effect.

iii. Do the sample results with failed surrogate recoveries have data flags? If so, are the data flags clearly defined?

☒ Yes ☐ No Comments:

iv. Data quality or usability affected? (Use the comment box to explain.)

Comments:

No

d. Trip blank – Volatile analyses only (GRO, BTEX, Volatile Chlorinated Solvents, etc.): Water and Soil

i. One trip blank reported per matrix, analysis and cooler?

☐ Yes ☐ No Comments: N/A

ii. Is the cooler used to transport the trip blank and VOA samples clearly indicated on the COC? (If not, a comment explaining why must be entered below)

☐ Yes ☐ No Comments: N/A

iii. All results less than PQL?

☐ Yes ☐ No Comments: N/A

iv. If above PQL, what samples are affected?

Comments: N/A

v. Data quality or usability affected? Explain.

Comments: N/A

e. Field Duplicate

i. One field duplicate submitted per matrix, analysis and 10 project samples?

☐ Yes ☒ No Comments:

ii. Submitted blind to lab?

☐ Yes ☒ No Comments:

iii. Precision – All relative percent differences (RPD) less than specified DQOs? (Recommended: 30% water, 50% soil)

$$\text{RPD (\%)} = \text{Absolute value of: } \frac{(R_1-R_2)}{((R_1+R_2)/2)} \times 100$$

Where R_1 = Sample Concentration
R_2 = Field Duplicate Concentration

☐ Yes ☐ No Comments: N/A

iv. Data quality or usability affected? (Use the comment box to explain why or why not.)

Comments:

No

f. Decontamination or Equipment Blank (If not applicable, a comment stating why must be entered below.)

☐ Yes ☐ No ☒ Not Applicable

i. All results less than PQL?

☐ Yes ☐ No Comments: N/A

ii. If above PQL, what samples are affected?

Comments: N/A

iii. Data quality or usability affected? Explain.

Comments: N/A

7. Other Data Flags/Qualifiers (ACOE, AFCEE, Lab Specific, etc.)

a. Defined and appropriate?

☒ Yes ☐ No Comments:

Attachment O:
Friedman and Bruya Report 6.19.09

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

James E. Bruya, Ph.D.
Charlene Morrow, M.S.
Yelena Aravkina, M.S.
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Kurt Johnson, B.S.

3012 16th Avenue West
Seattle, WA 98119-2029
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FAX: (206) 283-5044
e-mail: fbi@isomedia.com

June 19, 2009

Elijah Donat, Project Manager
Chilkat Environmental
223 Old Hart St.
Haines, AK 99827

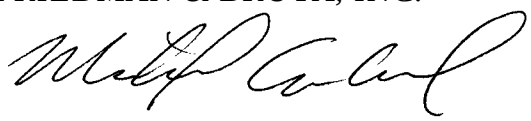
Dear Mr. Donat:

Included are the results from the testing of material submitted on June 11, 2009 from the Chilkoot Lumber Company, F&BI 906112 project. There are 10 pages included in this report. Any samples that may remain are currently scheduled for disposal in 30 days. If you would like us to return your samples or arrange for long term storage at our offices, please contact us as soon as possible.

We appreciate this opportunity to be of service to you and hope you will call if you should have any questions.

Sincerely,

FRIEDMAN & BRUYA, INC.



Michael Erdahl
Project Manager

Enclosures
NAA0619R.DOC

CASE NARRATIVE

This case narrative encompasses samples received on June 11, 2009 by Friedman & Bruya, Inc. (ADEC laboratory approval number UST-007) from the Chilkat Environmental Chilkoot Lumber Company, F&BI 906112 project. The samples were received at 1 °C in good condition and were refrigerated upon receipt. Samples were logged in under the laboratory ID's listed below.

Laboratory ID	Chilkat Environmental	Date Sampled
906112-01	Ash-1	06/10/09
906112-02	Ash-2	06/10/09
906112-03	Ash-3	06/10/09
906112-04	HBox-1	06/10/09
906112-05	Crane-1	06/10/09
906112-06	Crane-2	06/10/09
906112-07	Crane-3	06/10/09
906112-08	Used oil-1	06/10/09
906112-09	AST-1	06/10/09
906112-10	AST-2	06/10/09
906112-11	AST-3	06/10/09
906112-12	AST-3a	06/10/09
906112-13	Tansformer Shed	06/10/09
906112-14	Transformer Connex	06/10/09

Samples Ash-1, Ash-2, and Ash-3 were sent to Pace Analytical for dioxin analysis. The report generated by Pace Analytical will be forwarded to your office upon receipt.

The samples were analyzed as follows.

GRO (soil) - Analysis Method AK 101, Extraction Method 5035

All quality control requirements were acceptable.

DRO/RRO (soil) - Analysis Method AK 102/AK 103, Extraction Method 3550B

All quality control requirements were acceptable.

PCBs (soil) - Analysis Method 8082A, Extraction Method 3550B

All quality control requirements were acceptable.

Date of Report: 06/19/09
Date Received: 06/11/09
Project: Chilkoot Lumber Company, F&BI 906112
Date Extracted: 06/10/09 (field extracted)
Date Analyzed: 06/12/09

RESULTS FROM THE ANALYSIS OF THE SOIL SAMPLES FOR TOTAL PETROLEUM HYDROCARBONS AS GASOLINE USING EPA METHOD AK 101

Results Reported on a Dry Weight Basis
Results Reported as mg/kg (ppm)

Sample ID Laboratory ID	Gasoline Range (C_6-C_{10})	Surrogate (% Recovery) (Limit 50-150)
AST-1 d 906112-09 1/10	1,300	ip
AST-2 d 906112-10 1/10	1,200	ip
AST-3 d 906112-11 1/10	1,100	ip
AST-3a d 906112-12 1/10	740	ip
Method Blank	<2	112

Date of Report: 06/19/09
Date Received: 06/11/09
Project: Chilkoot Lumber Company, F&BI 906112
Date Extracted: 06/15/09
Date Analyzed: 06/15/09, 06/16/09, and 06/17/09

RESULTS FROM THE ANALYSIS OF THE SOIL SAMPLES FOR TOTAL PETROLEUM HYDROCARBONS AS DIESEL USING METHOD AK 102

Results Reported on a Dry Weight Basis
Results Reported as mg/kg (ppm)

Sample ID Laboratory ID	Diesel Range (C_{10}-C_{25})	Surrogate (% Recovery) (Limit 50-150)
HBox-1 d 906112-04 1/20	11,000	149
Crane-1 906112-05	58	81
Crane-2 906112-06	690	96
Crane-3 906112-07	24	90
Used oil-1 d 906112-08 1/10	13,000	122
AST-1 d 906112-09 1/10	5,600	117
AST-2 d 906112-10 1/10	15,000	ip
AST-3 d 906112-11 1/10	16,000	ip
AST-3a d 906112-12 1/10	6,100	120
Method Blank	<10	94

Date of Report: 06/19/09
Date Received: 06/11/09
Project: Chilkoot Lumber Company, F&BI 906112
Date Extracted: 06/15/09
Date Analyzed: 06/15/09 and 06/17/09

RESULTS FROM THE ANALYSIS OF THE SOIL SAMPLES FOR TOTAL PETROLEUM HYDROCARBONS AS MOTOR OIL USING METHOD AK 103

Results Reported on a Dry Weight Basis
Results Reported as mg/kg (ppm)

Sample ID Laboratory ID	Motor Oil Range (C_{25}-C_{36})	Surrogate (% Recovery) (Limit 50-150)
HBox-1 d 906112-04 1/20	26,000	69
Crane-1 906112-05	300	81
Crane-2 906112-06	1,200	ip
Crane-3 906112-07	160	95
Used oil-1 d 906112-08 1/10	15,000	ip
AST-1 906112-09	160	99
AST-2 d 906112-10 1/10	1,600	65
AST-3 d 906112-11 1/10	1,200	53
AST-3a 906112-12	410	63
Method Blank	<50	75

Date of Report: 06/19/09
Date Received: 06/11/09
Project: Chilkoot Lumber Company, F&BI 906112
Date Extracted: 06/12/09
Date Analyzed: 06/12/09

RESULTS FROM THE ANALYSIS OF SOIL SAMPLES FOR PCBs REPORTED AS AROCLORS USING EPA METHOD 8082A

Results Reported on a Dry Weight Basis
Results Reported as mg/kg (ppm)

Sample ID Laboratory ID	Aroclor 1221	1232	1016	1242	1248	1254	1260	Surrogate (% Rec.) (Limit 50-150)
Tansformer Shed 906112-13	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	79
Transformer Connex 906112-14	<0.1	<0.1	<0.1	<0.1	0.2	<0.1	<0.1	94
Method Blank	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	82

Date of Report: 06/19/09
Date Received: 06/11/09
Project: Chilkoot Lumber Company, F&BI 906112

QUALITY ASSURANCE RESULTS FOR THE ANALYSIS OF SOIL SAMPLES FOR TOTAL PETROLEUM HYDROCARBONS AS GASOLINE USING EPA METHOD AK 101

Laboratory Code: Laboratory Control Sample

Analyte	Reporting Units	Spike Level	Percent Recovery LCS	Percent Recovery LCSD	Acceptance Criteria	RPD (Limit 20)
Gasoline	mg/kg (ppm)	20	108	113	60-120	5

Date of Report: 06/19/09
Date Received: 06/11/09
Project: Chilkoot Lumber Company, F&BI 906112

QUALITY ASSURANCE RESULTS FROM THE ANALYSIS OF SOIL SAMPLES FOR TOTAL PETROLEUM HYDROCARBONS AS DIESEL USING METHOD AK 102

Laboratory Code: 906112-06 (Duplicate)

Analyte	Reporting Units	(Dry wt) Sample Result	(Dry wt) Duplicate Result	Relative Percent Difference	Acceptance Criteria
Diesel	mg/kg (ppm)	690	730	6	0-20

Laboratory Code: Laboratory Control Sample

Analyte	Reporting Units	Spike Level	Percent Recovery LCS	Percent Recovery LCSD	Acceptance Criteria	RPD (Limit 20)
Diesel	mg/kg (ppm)	500	99	94	75-125	5

Date of Report: 06/19/09
Date Received: 06/11/09
Project: Chilkoot Lumber Company, F&BI 906112

QUALITY ASSURANCE RESULTS FROM THE ANALYSIS OF SOIL SAMPLES FOR TOTAL PETROLEUM HYDROCARBONS AS MOTOR OIL USING METHOD AK 103

Laboratory Code: 906112-06 (Duplicate)

Analyte	Reporting Units	(Dry wt) Sample Result	(Dry wt) Duplicate Result	Relative Percent Difference	Acceptance Criteria
Motor Oil	mg/kg (ppm)	1,200	1,200	0	0-20

Laboratory Code: Laboratory Control Sample

Analyte	Reporting Units	Spike Level	Percent Recovery LCS	Percent Recovery LCSD	Acceptance Criteria	RPD (Limit 20)
Motor Oil	mg/kg (ppm)	500	102	109	60-120	7

Date of Report: 06/19/09
Date Received: 06/11/09
Project: Chilkoot Lumber Company, F&BI 906112

QUALITY ASSURANCE RESULTS FOR THE ANALYSIS OF SOIL SAMPLES FOR POLYCHLORINATED BIPHENYLS AS AROCLOR 1016/1260 BY EPA METHOD 8082A

Laboratory Code: 906098-01 (Duplicate)

Analyte	Reporting Units	Sample Result	Duplicate Result	RPD (Limit 20)
Aroclor 1016	mg/kg (ppm)	<0.1	<0.1	nm
Aroclor 1260	mg/kg (ppm)	<0.1	<0.1	nm

Laboratory Code: Laboratory Control Sample

Analyte	Reporting Units	Spike Level	% Recovery LCS	% Recovery LCSD	Acceptance Criteria	RPD (Limit 20)
Aroclor 1016	mg/kg (ppm)	0.8	119	105	73-135	13
Aroclor 1260	mg/kg (ppm)	0.8	119	113	72-149	5

Data Qualifiers & Definitions

a - The analyte was detected at a level less than five times the reporting limit. The RPD results may not provide reliable information on the variability of the analysis.

A1 – More than one compound of similar molecule structure was identified with equal probability.

b - The analyte was spiked at a level that was less than five times that present in the sample. Matrix spike recoveries may not be meaningful.

ca - The calibration results for this range fell outside of acceptance criteria. The value reported is an estimate.

c - The presence of the analyte indicated may be due to carryover from previous sample injections.

d - The sample was diluted. Detection limits may be raised due to dilution.

ds - The sample was diluted. Detection limits are raised due to dilution and surrogate recoveries may not be meaningful.

dv - Insufficient sample was available to achieve normal reporting limits and limits are raised accordingly.

fb - The analyte indicated was found in the method blank. The result should be considered an estimate.

fc – The compound is a common laboratory and field contaminant.

hr - The sample and duplicate were reextracted and reanalyzed. RPD results were still outside of control limits. The variability is attributed to sample inhomogeneity.

ht - The sample was extracted outside of holding time. Results should be considered estimates.

ip - Recovery fell outside of normal control limits. Compounds in the sample matrix interfered with the quantitation of the analyte.

j – The result is below normal reporting limits. The value reported is an estimate.

J - The internal standard associated with the analyte is out of control limits. The reported concentration is an estimate.

jl - The analyte result in the laboratory control sample is out of control limits. The reported concentration should be considered an estimate.

jr - The rpd result in laboratory control sample associated with the analyte is out of control limits. The reported concentration should be considered an estimate.

js - The surrogate associated with the analyte is out of control limits. The reported concentration should be considered an estimate.

lc - The presence of the compound indicated is likely due to laboratory contamination.

L - The reported concentration was generated from a library search.

nm - The analyte was not detected in one or more of the duplicate analyses. Therefore, calculation of the RPD is not applicable.

pc – The sample was received in a container not approved by the method. The value reported should be considered an estimate.

pr – The sample was received with incorrect preservation. The value reported should be considered an estimate.

ve - The value reported exceeded the calibration range established for the analyte. The reported concentration should be considered an estimate.

vo - The value reported fell outside the control limits established for this analyte.

x - The pattern of peaks present is not indicative of diesel.

y - The pattern of peaks present is not indicative of motor oil.

906112

SAMPLE CHAIN OF CUSTODY ME 06/11/09

CI3

Page # 1 of 2

Send Report To Chilkat Environmental
Company attn Elijah Donat
Address PO Box 865
City, State, ZIP Haines AK 99827
Phone # 907 766 3897 Fax #

SAMPLERS (signature) Well R

PROJECT NAME/NO.: Chilkoot Lumber Company

PO #

REMARKS

TURNAROUND TIME
- [X] Standard (2 Weeks)
- [ ] RUSH
- Rush charges authorized by:

SAMPLE DISPOSAL
- [X] Dispose after 30 days
- [ ] Return samples
- [ ] Will call with instructions

Sample ID	Lab ID	Date Sampled	Time Sampled	Sample Type	# of containers	TPH-Diesel	TPH-Gasoline	BTEX by 8021B	VOCs by 8260	SVOCs by 8270	HFS	EPA 1613	AK 102/103 DRO/RRO	AK 101 GRO				Notes
Ash-1	01	6/10/09	0915	Soil	1							X						
Ash-2	02	6/10/09	0918	Soil	1							X						
Ash-3	03	6/10/09	0922	Soil	1							X						
HBox-1	04	6/10/09	1015	Soil	1								X					
Crane-1	05	6/10/09	1018	Soil	1								X					
Crane-2	06	6/10/09	1025	Soil	1								X					
Crane-3	07	6/10/09	1032	Soil	1								X					
Used oil-1	08	6/10/09	1158	Soil	1								X					
AST-1	09 A-B	6/10/09	1736	Soil	2								X	X				
AST-2	10 A-B	6/10/09	1755	Soil	2								X	X				

Friedman & Bruya, Inc.
3012 16th Avenue West
Seattle, WA 98119-2029
Ph. (206) 285-8282
Fax (206) 283-5044

	SIGNATURE	PRINT NAME	COMPANY	DATE	TIME
Relinquished by:		William Prisciandaro	Chilkat Environmental	6/10/09	1905
Received by:		Nhan Phan	FEBI	6/11/09	19:41
Relinquished by:					
Received by:			Samples received at	1 °C	

FORMS\COC\COC.DOC

906112

SAMPLE CHAIN OF CUSTODY ME 06/11/09

CI3

Page # 2 of 2

Send Report To Chilkat Environmental
Company Attn Elijah Domat
Address PO Box 865
City, State, ZIP Haines AK 99827
Phone # 907 766 3897 Fax #

SAMPLERS (signature) William Priscendaro

PROJECT NAME/NO.: Chilkoot Lumber Company

PO #:

REMARKS:

TURNAROUND TIME
- [x] Standard (2 Weeks)
- [ ] RUSH
Rush charges authorized by:

SAMPLE DISPOSAL
- [x] Dispose after 30 days
- [ ] Return samples
- [ ] Will call with instructions

Sample ID	Lab ID	Date Sampled	Time Sampled	Sample Type	# of containers	ANALYSES REQUESTED: TPH-Diesel	TPH-Gasoline	BTEX by 8021B	VOCs by 8260	SVOCs by 8270	HFS	AK 101/102 PRO RRS	AK 101 GRO	EPA 8082				Notes
AST-3	11 A-B	6/10/09	1804	Soil	2							X	X					
AST-3a	12 A-B	6/10/09	1804	Soil	2							X	X					
Transformer shed	13	6/10/09	1839	Soil	1									X				
Transformer Conex	14	6/10/09	1843	Soil	1									X				

SIGNATURE	PRINT NAME	COMPANY	DATE	TIME
Relinquished by: William Priscendaro	William Priscendaro	Chilkat Env	6/10/09	1905
Received by: Nhan Pham	Nhan Pham	FE BI	6/11/09	19:41
Relinquished by:				
Received by:		Samples received at 1 °C		

Friedman & Bruya, Inc.
3012 16th Avenue West
Seattle, WA 98119-2029
Ph. (206) 285-8282
Fax (206) 283-5044

Alaska Department of Environmental Conservation • Spill Prevention and Response Division • Contaminated Sites Program

Laboratory Data Review Checklist

Completed by:

Title:

Date:

CS Report Name: Chilkoot Lumber Company

Report Date: 06/19/09

Consultant Firm: Chilkat Environmental

Laboratory Name: Friedman & Bruya, Inc.

Laboratory Report Number: 906112

ADEC File Number:

ADEC RecKey Number:

1. Laboratory

   a. Did an ADEC CS approved laboratory receive and perform all of the submitted sample analyses?

   ☒ Yes ☐ No Comments:

   b. If the samples were transferred to another "network" laboratory or sub-contracted to an alternate laboratory, was the laboratory performing the analyses ADEC CS approved?

   ☒ Yes ☐ No Comments: PACE ANALYTICAL FOR DIOXINS

2. Chain of Custody (COC)

   a. COC information completed, signed, and dated (including released/received by)?

   ☒ Yes ☐ No Comments:

   b. Correct analyses requested?

   ☒ Yes ☐ No Comments:

3. Laboratory Sample Receipt Documentation

a. Sample/cooler temperature documented and within range at receipt (4° ± 2° C)?

☐ Yes ☒ No Comments: SAMPLES ARRIVED AT 1°C.

DATA NOT AFFECTED —

b. Sample preservation acceptable – acidified waters, Methanol preserved VOC soil (GRO, BTEX, Volatile Chlorinated Solvents, etc.)?

☒ Yes ☐ No Comments:

c. Sample condition documented – broken, leaking (Methanol), zero headspace (VOC vials)?

☒ Yes ☐ No Comments:

d. If there were any discrepancies, were they documented? For example, incorrect sample containers/preservation, sample temperature outside of acceptable range, insufficient or missing samples, etc.?

☒ Yes ☐ No Comments:

e. Data quality or usability affected? Explain.

Comments:

NO

4. Case Narrative

a. Present and understandable?

☒ Yes ☐ No Comments:

b. Discrepancies, errors or QC failures identified by the lab?

☒ Yes ☐ No Comments:

c. Were all corrective actions documented?

☒ Yes ☐ No Comments:

d. What is the effect on data quality/usability according to the case narrative?

Comments:

None

5. Samples Results

a. Correct analyses performed/reported as requested on COC?

☒ Yes ☐ No Comments:

b. All applicable holding times met?

☒ Yes ☐ No Comments:

c. All soils reported on a dry weight basis?

☒ Yes ☐ No Comments:

d. Are the reported PQLs less than the Cleanup Level or the minimum required detection level for the project?

☒ Yes ☐ No Comments:

e. Data quality or usability affected?

Comments:

No

6. QC Samples

a. Method Blank

i. One method blank reported per matrix, analysis and 20 samples?

☒ Yes ☐ No Comments:

ii. All method blank results less than PQL?

☒ Yes ☐ No Comments:

iii. If above PQL, what samples are affected?

Comments:

None

iv. Do the affected sample(s) have data flags? If so, are the data flags clearly defined?

☐ Yes ☐ No Comments: N/A

v. Data quality or usability affected? Explain.

Comments:

No

b. Laboratory Control Sample/Duplicate (LCS/LCSD)

i. Organics – One LCS/LCSD reported per matrix, analysis and 20 samples? (LCS/LCSD required per AK methods, LCS required per SW846)

☒ Yes ☐ No Comments:

ii. Metals/Inorganics – one LCS and one sample duplicate reported per matrix, analysis and 20 samples?

☒ Yes ☐ No Comments:

iii. Accuracy – All percent recoveries (%R) reported and within method or laboratory limits? And project specified DQOs, if applicable. (AK Petroleum methods: AK101 60%-120%, AK102 75%-125%, AK103 60%-120%; all other analyses see the laboratory QC pages)

☒ Yes ☐ No Comments:

iv. Precision – All relative percent differences (RPD) reported and less than method or laboratory limits? And project specified DQOs, if applicable. RPD reported from LCS/LCSD, MS/MSD, and or sample/sample duplicate. (AK Petroleum methods 20%; all other analyses see the laboratory QC pages)

☒ Yes ☐ No Comments:

v. If %R or RPD is outside of acceptable limits, what samples are affected?

Comments:

None

vi. Do the affected sample(s) have data flags? If so, are the data flags clearly defined?

☐ Yes ☐ No Comments: N/A

vii. Data quality or usability affected? (Use comment box to explain)
Comments: N/A

c. Surrogates – Organics Only

i. Are surrogate recoveries reported for organic analyses – field, QC and laboratory samples?
☒ Yes ☐ No Comments:

ii. Accuracy – All percent recoveries (%R) reported and within method or laboratory limits? And project specified DQOs, if applicable. (AK Petroleum methods 50-150 %R; all other analyses see the laboratory report pages)
~~☐ Yes~~ ☒ No Comments: Surrogates outside of acceptance criteria for samples that were diluted or contained high concentrations of target material.

iii. Do the sample results with failed surrogate recoveries have data flags? If so, are the data flags clearly defined?
☒ Yes ☐ No Comments:

iv. Data quality or usability affected? (Use the comment box to explain.)
Comments:
No

d. Trip blank – Volatile analyses only (GRO, BTEX, Volatile Chlorinated Solvents, etc.): Water and Soil

i. One trip blank reported per matrix, analysis and cooler?
☐ Yes ☒ No Comments:

ii. Is the cooler used to transport the trip blank and VOA samples clearly indicated on the COC? (If not, a comment explaining why must be entered below)
☐ Yes ☒ No Comments:

iii. All results less than PQL?
☐ Yes ☐ No Comments: N/A

iv. If above PQL, what samples are affected?

Comments: N/A

v. Data quality or usability affected? Explain.

Comments: N/A

e. Field Duplicate — ?

i. One field duplicate submitted per matrix, analysis and 10 project samples?

☒ Yes ☐ No Comments:

ii. Submitted blind to lab?

☒ Yes ☐ No Comments:

iii. Precision – All relative percent differences (RPD) less than specified DQOs? (Recommended: 30% water, 50% soil)

$$\text{RPD (\%)} = \text{Absolute value of: } \frac{(R_1-R_2)}{((R_1+R_2)/2)} \times 100$$

Where R_1 = Sample Concentration
R_2 = Field Duplicate Concentration

☒ Yes ☐ No Comments:

iv. Data quality or usability affected? (Use the comment box to explain why or why not.)

Comments:

No

f. Decontamination or Equipment Blank (If not applicable, a comment stating why must be entered below.)

☐ Yes ☐ No ☒ Not Applicable

i. All results less than PQL?

☐ Yes ☐ No Comments: N/A

ii. If above PQL, what samples are affected?

Comments: N/A

iii. Data quality or usability affected? Explain.

Comments: N/A

7. Other Data Flags/Qualifiers (ACOE, AFCEE, Lab Specific, etc.)

a. Defined and appropriate?

☒ Yes ☐ No Comments: