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# WASTE DETERMINATION
# AND
# DISPOSAL ASSISTANCE

## Suspected Creosote Contaminated Timber Planks

Port of Portland, Marine Terminal 1
2200 NW Front
Portland, Oregon

May 2, 1995

Prepared for:

Port of Portland
Portland, Oregon

Prepared by:

Hahn and Associates, Inc.
Portland, Oregon

Project #2994

USEPA SF
1286676

POPT1S700165

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**WASTE DETERMINATION**
**AND**
**DISPOSAL ASSISTANCE**

**Suspected Creosote-Contaminated Timber Planks**

**Marine Terminal 1**
**Port of Portland**

# 1.0 INTRODUCTION

## 1.1 Purpose

The environmental management firm of Hahn and Associates, Inc. (HAI) was requested by the Port of Portland (Port) to sample, characterize and evaluate the appropriate disposal options prior to final disposal of four 20-yard drop-boxes of suspected creosote-contaminated timber planks (timber planks) loacted at Marine Terminal 1. This report summarizes work performed under this project, and contains pertinent documentation including a waste stream determination, analytical data, and waste profiles.

## 1.2 Scope of Work

The environmental management activities included the following five tasks:

1) Obtain a sample of the suspected timber planks

2) Characterize the timber planks as either Resource Conservation and Recovery Act (RCRA) hazardous waste or non-hazards waste, based upon the analytical results and knowledge of the waste generation process

3) Obtain approval for acceptance of the timber planks at an appropriate treatment or disposal facility

4) Coordinate the removal of the timber planks from Marine Terminal 1 (T-1) and to the ultimate disposal or treatment facility

5) Provide documentation regarding field activities, waste determination methodology, and treatment or disposal of the timber planks

## 1.3 Background

The timber planks were generated during timber plank removal activities associated with docks located at T-1. According to the Port, the timber planks were suspected to be contaminated with cresols, pentachlorophenol, or other possible hazardous substance.

## 2.0 WASTE DETERMINATIONS

### 2.1 Sampling Activities

On March 3, 1995, Ms. Jennifer Bach, a representative of HAI, obtained a sample of the contaminated timber planks from one of the four drop boxes as a representative sample of all four drop-boxes (sample number 92994-033195-01). According to the Port, the timber planks located in all four drop boxes were generated from the same area of T-1. The sample was submitted to North Creek Analytical Laboratory, Beaverton, Oregon for analyses for the presence of semivolatile hazardous substances reported in parts per million (ppm) using United States Environmental Protection Agency (EPA) Method 2870 (Appendix A).

It was pertinent to determine if the timber plank material exhibited certain semivolatile hazardous substances that exhibit hazardous waste characteristics pursuant to the Code of Federal Regulations, Part 261.20 (40 CFR §261.20).

### 2.2 Waste Stream Determination and Analytical Results

The contaminated timber planks were characterized in the form of a waste stream determination. The determination was documented on a HAI Solid/Hazardous Waste Characterization Worksheet (worksheet) (Appendix B). The worksheet identifies the source of the waste (if known), the sample identification number, and the analyses performed for characterization purposes. The purpose of preparing the worksheet was to identify the timber planks as either hazardous or non-hazardous waste.

Following the preparation of the worksheet and a review of the North Creek Analytical Laboratory report, the contaminated timber planks were not contaminated with hazardous waste characteristic semivolatile hazardous substances.

## 3.0 WASTE DISPOSAL

### 3.1 *Non-Hazardous Waste*

At the direction of the Port, between April 20 and April 25, 1995, McInnis and Sons Company transported the four drop-boxes to Hillsboro Landfill as non-hazardous waste under the approved Hillsboro Landfill permit number 2247.

The Hillsboro Landfill "Generator's Special Waste Profile" permit number 2247 (Appendix C) for timber planks located at T-1, Port of Portland, will stay active until July 18, 1995.

Any questions regarding this information presented in this report are welcome and should be referred to the undersigned project manager. Thank you for the opportunity to be of service to you in this matter.

Hahn and Associates, Inc.

Project Manager

by _____
Jennifer M. Bach
Environmental Scientist

Reviewer

by _____
Gary W. Hahn
President

# APPENDIX A

Hazardous Waste Characterization Worksheet

# SOLID/HAZARDOUS WASTE CHARACTERIZATION WORKSHEET

Facility: Port of Portland Terminal 1
220 NW Front
Portland, Oregon 97209

Project #: 2994
EPA ID #: N/A
Completed by: JMB

The waste is classified as **HAZARDOUS** / **NON-HAZARDOUS** (circle one) based on the following:

1) Describe the waste generation process: Discarded contaminated timber planks from Terminal 1 docks. Generated during timber plank replacement activities

Known substances (Analytical/MSDS) and their concentration: sample #: **(2994-033195-01)**

EPA Method 8270 = ND (see attached lab data)

2) Is this waste a **solid waste**? (40 CFR 261.2 and exclusions 40 CFR 261.4) YES

3) Is this waste a **listed hazardous waste**? NO

F-Listed (40 CFR 261.31): Wastes from non-specific sources NO

K-Listed (40 CFR 261.32): Wastes from specific sources NO

P-Listed (40 CFR 261.33): Discarded commercial chemical product NO

U-Listed (40 CFR 261.33): Discarded commercial chemical product NO

4) Has the waste been excluded under 40 CFR 261.4? YES

5) Is the waste a **characteristic hazardous waste**? NO

Ignitable (40 CFR 261.21) NO (Generator Knowledge)

Corrosive (40 CFR 261.22) NO (Generator Knowledge)

Reactive (40 CFR 261.23) NO (Generator Knowledge)

Toxic (40 CFR 261.24) NO (Generator Knowledge)

6) Is the waste a **state-only hazardous waste**?

Residue containing 3% or greater of any P-listed waste NO

Residue containing 10% or greater of any U-Listed waste NO

7) Is the solid/hazardous waste excluded as a recyclable material (e.g. used oil that is re-refined, scrap metals, used batteries returned to proper facilities) (40 CFR 261.6(a)). NO

EPA or State Waste Codes: NONE

(DOT) Waste Description: Non-RCRA Waste Liquid Material Not Regulated by DOT

Signature: [signature] Date: 4-26-95

POPT1S700171

# 40 CFR 261.4 HAZARDOUS WASTE EXEMPTIONS

**261.4(a) FOLLOWING MATERIALS ARE NOT A SOLID WASTE**

1) Domestic Sewage and waste that passes through a sewer system to a publicly-owned treatment works.
2) Industrial Wastewater point source discharges subject to Clean Water Act (NPDES)
3) Irrigation Return Flows.
4) Special Nuclear Material, source or by-product as defined by the Atomic Energy Act of 1954.
5) In-Situ Mining Materials, not removed from the ground during extraction process.
6) Pulping Liquors, reclaimed in recovery furnace and then reused, unless speculatively accumulated (261.1(c)).
7) Spent Sulfuric Acid used to produce virgin sulfuric acid, unless speculatively accumulated.
8) Secondary materials that are reclaimed for reuse in the production process(es), provided:
   i) only tank storage with closed system piping;
   ii) reclamation does no include combustion (such as boilers, industrial furnace or incinerator);
   iii) materials must be reclaimed within 12 months; and
   iv) reclaimed material is not used to produce a fuel or into products that constitutes disposal.
9) Spent Wood Preserving Solutions or Wastewaters that are reclaimed and reused for their original purpose.
10) Specified EPA K-Wastes and Coke By-Products that are only hazardous for toxicity characteristics, if the materials are recycled to coke ovens, tar recovery process, or mixed with coal tar prior to the tar's sale or refining, provided there is no land disposal of the material between recycling and re-use.

**261.4(b) SOLID WASTES THAT ARE NOT HAZARDOUS WASTES**

1) Household Wastes (residences, hotels/motels, bunkhouse, ranger stations, crew quarters, camp grounds, picnic grounds and day-use recreation areas).
2) Growing/Harvesting Crops and Raising Animal (incl. manure) Materials, used as soil fertilizers.
3) Mining Overburden returned to mine site.
4) Fly and bottom Ash, Slag, and Flue-Gas Emission Control Wastes, generated primarily by coal or fossil fuel combustion, provided that hazardous wastes are not received for combustion.
5) Drilling Fluids, Waters and Other Wastes associated with the exploration, development, or production of crude oil, natural gas or geothermal energy.
6) TC Chromium Wastes, if the waste and chromium used in the process is exclusively (or nearly) trivalent, and it is used in a non-oxidizing environment (specific examples - mostly related to tanning process are in regs.).
7) Ore and Mineral Wastes from extraction, benefication and processing, except for facilities that receive hazardous waste (see regs. for details).
8) Cement Kiln Dust Waste, except for facilities that receive hazardous waste.
9) Discarded Arsenical-Treated Wood or Wood Products (TC D004-D017 only), if the materials are utilized for an intended end use.
10) Petroleum-Contaminated Media and Debris (TC D018-D043 only), that are regulated by 40 CFR 280.
11) Injected Ground Water (TC D018-D043 only) at petroleum extraction, reclimation, storage facility site remediations. (see regs. for details)
12) Used Chlorofloro Carbons (CFC) from totally enclosed heat transfer (refrigeration) equipment (mobile or fixed), if reclaimed for further use.
15) Used Oil Filters, (non-terne plated) if gravity hot-drained. (see regs. for details)

**261.4(c) IN-PROCESS HAZARDOUS WASTES**; e.g. generated in a raw or product process, until it leaves said process or the process has been shut down for 90-days (at which time the 90-day containerized storage clock starts) (see regs. for details)

**261.4(d) ENVIRONMENTAL SAMPLES** (see regs. for details)

**261.4(e) TREATABILITY STUDY SAMPLES** (see regs. for details)

**261.4(f) SAMPLES UNDERGOING TREATABILITY STUDIES AT LABORATORIES AND TESTING FACILITIES** (see regs. for details)

TC = a waste that is hazardous for toxicity characteristic only

## APPENDIX B

North Creek Analytical Laboratory report and
Chain-of-Custody Documentation

NORTH CREEK ANALYTICAL
18939 120th Avenue N.E., Suite 101 • Bothell, WA 98011-9508 (206) 481-9200 • FAX 485-2592
East 11115 Montgomery, Suite B • Spokane, WA 99206-4776 (509) 924-9200 • FAX 924-9290
9405 S.W. Nimbus Avenue • Beaverton, OR 97008-7132 (503) 643-9200 • FAX 644-2202

April 18, 1995

Hahn and Associates, Inc.
434 N.W. 6th Avenue
Suite 203
Portland, OR 97209-3600

Attention: Jennifer Bach

RE: JOB # 2910 AND 2994
P.O.# R000496
PROJECT - POP BLG AND PADCRE

Enclosed are test results for your samples received in this lab on Apr. 03, 1995. For your reference, these analyses have been assigned our NCA # P504017.

Solid samples are reported on a dry weight basis except for Oregon DEQ Fuels Methods and where otherwise noted.

This report will be accompanied by a separate Quality Control Data Report, unless omitted by client request.

Please call if you have any questions.

Respectfully,

Howard Holmes
Project Manager

NORTH CREEK ANALYTICAL
18939 120th Avenue N.E., Suite 101 • Bothell, WA 98011-9508 (206) 481-9200 • FAX 485-2992
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9405 S.W. Nimbus Avenue • Beaverton, OR 97008-7132 (503) 643-9200 • FAX 644-2202

April 18, 1995

Hahn and Associates, Inc.
434 N.W. 6th Avenue
Suite 203
Portland, OR 97209-3600

Attention: Jennifer Bach

Re: Quality Control Data
JOB # 2910 AND 2994
P.O.# R000496
PROJECT - POP BLG AND PADCRE

NCA project number P504017.

Note: Surrogate Recoveries are included in the final report.

QUALITY CONTROL DEFINITIONS

METHOD BLANK RESULTS

The method blank is an analyte-free matrix which is carried through the same analytical process as the samples. It is used to document contamination that may result from the analytical process.

SURROGATE STANDARD

A surrogate standard (i.e., a chemical compound not expected to occur in an environmental sample) is added to each sample, blank, and matrix spike sample just prior to extraction or processing. The recovery of the surrogate standard is used to monitor for unusual matrix effects, gross sample processing errors, etc. Surrogate recovery is evaluated for acceptance by determining whether the measured concentration falls within accepted limits.

NORTH CREEK ANALYTICAL

18939 120th Avenue N.E., Suite 101 • Bothell, WA 98011-9508 (206) 481-9200 • FAX 485-2992
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Accuracy is measured by percent recovery as in:

$$\% \text{ Recovery} = \frac{\text{(Measured Concentration)}}{\text{(Actual Concentration)}} \times 100$$

Precision is measured using duplicate tests by relative percent difference.

$$\text{RPD} = \frac{\text{(Result of Test 1 - Result of Test 2)}}{\text{(Result of Test 1 + Result of Test 2)/2}} \times 100$$

If you should have any questions concerning this report, please contact me.

Sincerely,

Howard Holmes
Project Manager



FROM :NORTH CREEK ANALYTICAL TO : 5032272209 1995,05-02 11:58AM #249 P.03/50

POPT1S700176

NORTH CREEK ANALYTICAL
18939 120th Avenue N.E., Suite 101 • Bothell, WA 98011-9508 (206) 481-9200 • FAX 485-2992
East 11115 Montgomery, Suite B • Spokane, WA 99206-4776 (509) 924-9200 • FAX 924-9290
9405 S.W. Nimbus Avenue • Beaverton, OR 97008-7132 (503) 643-9200 • FAX 644-2202

# TCLP BNAs per EPA 1311, 8270
## Results in mg/L (ppm)

Client: Hahn and Associates, Inc.
Project: POP BLG AND PADCRE

NCA Project #: P504017
Matrix: soil
Sampled: 03/31/95
Received: 04/03/95

| Client ID | Lab ID | Analyte | Results | MRL | Date Prepared | Date Analyzed |
|---|---|---|---|---|---|---|
| 2994-033195-01 *1 | P504017-5 | Cresols(total) | ND | 0.050 | 04/06/95 | 04/13/95 |
| | | 1,4-Dichlorobenzene | ND | 0.10 | | |
| | | 2,4-Dinitrotoluene | ND | 0.050 | | |
| | | Hexachloro-1,3-butadiene | ND | 0.10 | | |
| | | Hexachlorobenzene | ND | 0.050 | | |
| | | Hexachloroethane | ND | 0.10 | | |
| | | Nitrobenzene | ND | 0.050 | | |
| | | Pentachlorophenol | ND | 0.10 | | |
| | | Pyridine | ND | 0.20 | | |
| | | 2,4,5-Trichlorophenol | ND | 0.050 | | |
| | | 2,4,6-Trichlorophenol | ND | 0.050 | | |

MRL Method Reporting Level
ND None Detected at or above the method reporting level
* See Comment Section at end of report

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9405 S.W. Nimbus Avenue • Beaverton, OR 97008-7132 (503) 643-9200 • FAX 644-2202

## SURROGATE RECOVERIES (%)

Client: Hahn and Associates, Inc.
Project: POP BLG AND PADCRE

NCA Number: P504017
Received: 04/03/1995

| Sample Name | Analyte | Result | Control Limits |
|---|---|---|---|
| **TCLP BNAs per EPA 1311, 8270** | | | |
| 2994-033195-01 | 2-Fluorobiphenyl | 114 | 43-116 |
| | 2-Fluorophenol | -- *2 | 21-100 |
| | Nitrobenzene-d5 | 86 | 35-114 |
| | Phenol-d6 | -- *2 | 10-94 |
| | p-Terphenyl-d14 | 49 | 33-141 |
| | 2,4,6-Tribromophenol | -- *2 | 10-123 |

MRL Method Reporting Level
ND None Detected at or above the method reporting level
* See Comment Section at end of report

NORTH CREEK ANALYTICAL
15939 120th Avenue N.E., Suite 101 • Bothell, WA 98011-9508 (206) 481-9200 • FAX 485-2992
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9405 S.W. Nimbus Avenue • Beaverton, OR 97008-7132 (503) 643-9200 • FAX 644-2202

## COMMENTS

| | | | |
|---|---|---|---|
| **Client:** | Hahn and Associates, Inc. | NCA Number: | P504017 |
| **Project:** | POP BLG AND PADCRE | **Received:** | 04/03/1995 |

1. Reporting limit is raised due to matrix interference.

2. Unable to calculate surrogate recovery due to matrix interference.

## APPENDIX C

Hillsboro Landfill Generator's Special Waste Profile
Permit Number 2247

# SANIFILL NORTHWEST

FAXED 4-18-95

## Special Waste Permit Management Decision

APPROVED

Special Waste Permit No.: 2247

Permit Expiration Date: 7-18-95

Generators Name: Port of Portland

Address of Waste Generation: 2200 NW Front

City: Portland State: OR.

General Waste Description: treated wood

Landfill Action: Disposal of the above described special waste is:

Approved ✓ Disapproved ___ for disposal at Hillsboro Landfill

at the disposal rate of $ 57 86 per Ton $ ___ Per trip min/charge.

Waste Acceptance Mgr. Signature: Ellen L. Ries Date: 4-18-95

Precautions, Conditions, or Limitations on Approval: ___

If disapproved, reason for denial of permit: ___

Credit/Billing Information

Accept ___ Reject: ___ By: ___

Comments: bill to Port of Portland

Landfill Account No. POR 004

APR-18-1995 09:13 FROM HILLSBORO LANDFILL TO 22722209 P.02

POPT1S700181

received
APR 18 1995

# SANIFILL NORTHWEST

Northeast Wasco County Landfill, Hillsboro Landfill, Riverbend Landfill

APPROVED

Permit No.: 2247

Approval Expiration: 7-18-95

## Generator's Special Waste Profile Sheet

IMPORTANT: This form must be completed by a Representative of the Waste Generator. The information on this form must be typed or legibly printed in ink and signed by an Authorized Agent of the Generator. Completed form bearing original signature must be provided PRIOR TO DISPOSAL.

## 1.0 Generator Information

1.1 Generator Name: Port of Portland

1.2 Site of Waste Generation: Marine Terminal 1

Facility Address: 2200 NW Front

City: Portland State: OR Zip: 97209

1.3 Technical Contact: Pat Quinn

Title: Environmental & Safety Affairs Manager

1.4 General Site Activity: Break-Bulk Marine Terminal

1.5 Generator's EPA ID No.: N/A

1.6 Facility Phone: (503) 231-5000

1.7 Technical Contact Phone: (503) 240-2014

## 2.0 Waste Description

2.1 General Waste Description: Contaminated Timber Planks

2.2 Process Generating Waste: Activities associated with replacing old planks.

2.3 Is this Waste "Hazardous Waste" as defined by Federal, State or Local Regulations: ___ Yes XX No

2.4 Has this waste ever been "handled" or "Disposed" of as hazardous: ___ Yes XX No

___ Material ___ Waste ___ Disposed of via a "uniform hazardous waste manifest".

If yes, explain: ___

2.4 Waste Generation Rate: ___ Tons ___ Cubic yards ___ Other: 4X 20 Yard Drop Boxes

Per: ___ Day ___ Week ___ Year 2 Other ___ One Time Disposal? ___ Yes ___ No.

2.6 Waste will be transported in: XX Roll Off Boxes ___ Drums (Type/Size): ___

___ Dump Trucks ___ Other: ___

## 3.0 Waste Properties at Room Temperature

3.1 Physical State:

XX Solid ___ Semi Solid

___ Powder ___ Liquid

___ Combination ___ Other: ___

3.2 Odor: XX None ___ Mild ___ Strong

3.3 pH Range: N/A to N/A

3.4 Color(s): Brown/Black

3.5 Percent Solid: 100 %

3.6 Flash Point F°: N/A None ___ <140° F

RETURN APPLICATION TO:
Hillsboro Landfill, Inc.
3205 SE Minter Bridge Rd.
Hillsboro, Oregon 97123

# SANIFILL NORTHWEST

Northern Wasco County Landfill, Hillsboro Landfill, Riverbend Landfill

Permit No.:

Approval Expiration:

## Generator's Special Waste Profile Sheet

IMPORTANT: This form must be completed by a Representative of the Waste Generator. The information on this form must be typed or legibly printed in ink and signed by an Authorized Agent of the Generator. Completed form bearing original signature must be provided PRIOR TO DISPOSAL.

## 1.0 Generator Information

1.1 Generator Name: Port of Portland

1.5 Generator's EPA ID No.: N/A

1.2 Site of Waste Generation: Marine Terminal 1

Facility Address: 2200 NW Front

City: Portland State: OR Zip: 97209

1.6 Facility Phone: (503) 231-5000

1.3 Technical Contact: Pad Quinn

Title: Environmental & Safety Affairs Manager

1.7 Technical Contact Phone: (503) 240-2014

1.4 General Site Activity: Break-Bulk Marine Terminal

## 2.0 Waste Description

2.1 General Waste Description: Contaminated Timber Planks

2.2 Process Generating Waste: Activities associated with replacing old planks.

2.3 Is this Waste "Hazardous Waste" as defined by Federal, State or Local Regulations: ____ Yes XX No

2.4 Has this waste ever been "handled" or "Disposed" of as hazardous ____ Yes XX No

____ Material ____ Waste ____ Disposed of via a "uniform hazardous waste manifest".

If yes, explain: ____

2.4 Waste Generation Rate: ____ Tons ____ Cubic Yards ____ Other: 4X 20 Yard Drop Boxes

Per: ____ Day ____ Week ____ Year Z Other ____ One Time Disposal? ____ Yes ____ No.

2.6 Waste will be transported in: XX Roll Off Boxes ____ Drums (Type/Size): ____

____ Dump Trucks ____ Other: ____

## 3.0 Waste Properties at Room Temperature

3.1 Physical State

XX Solid ____ Semi Solid

____ Powder ____ Liquid

____ Combination: ____ Other: ____

3.2 Odor: XX None ____ Mild ____ Strong

3.3 pH Range: N/A to: N/A

3.4 Color(s): Brown/Black

3.5 Percent Solid: 100 %

3.6 Flash Point F: N/A None ____ <140° F

RETURN APPLICATION TO:
Hillsboro Landfill, Inc.
3205 SE Minter Bridge Rd.
Hillsboro, Oregon 97123

## 4.0 Reactivity

| | | | |
|---|---|---|---|
| ___ Reactive with Water | ___ Alkaline Reactive | ___ Autopolymerizable | ___ Acid Reactive |
| ___ Explosive | ___ Thermally Sensitive | ___ Shock Sensitive | XX None of the Above |

## 5.0 Waste Contents

This Waste Contains:

| | | | |
|---|---|---|---|
| ___ Free Liquids | ___ Dioxins | ___ Pathogens | ___ PCBs |
| ___ Free Cyanide | ___ Organic Solvents | ___ OSHA Substances | |
| ___ Free Sulfide | ___ Used or Waste Oils | ___ Biological Materials | |
| ___ Free Ammonia | ___ Gasoline/Diesel | ___ Radioactive Materials | |
| XX None of the Above | | | |

## 6.0 Transportation

6.1 Proper U.S. DOT Shipping Name Non-RCRA Waste Solid

6.2 U.S. DOT Hazard Class: Material Not Regulated by DOT

XX This Waste is NOT a DOT Hazardous Material

6.3 Transporter Name: McGennis & Sons
Address: Portland-253-1429-Gele

6.4 Technical Contact: Gele
Phone: 253-1429

## 7.0 Attached Information

7.1 ANALYTICAL (check all that apply)

| | | | |
|---|---|---|---|
| ___ THP Gas/Diesel/Oil | ___ BTEX | ___ TPH-HCID | ___ TCLP Metals |
| ___ Semivolatile Organics | ___ Volatile Organics | ___ Herbicides/Pesticides | ___ TCLP Volatiles |

7.2 ___ MSDS ___ Generator Certification XX Other: EPA Method 1311, 8270

## 8.0 Billing Information

8.1 Bill To: Port of Portland
P.O. Box 3529
Portland, Oregon 97208

Attention: ~~Jennifer Altorfer~~ Bob Laughlin
Phone No.: ~~731-7320~~ 978-2412
P.O.#
Do you have an account with us? Yes

## 9.0 Generator Certification

I hereby certify that all information supplied is truly representative of the above mentioned waste. I agree to notify Sanifill Northwest if there is a change in the waste stream information submitted for acceptance. I also authorize Sanifill Northwest to periodically reanalyze the waste, at my expense. I also certify that all samples were collected according to EPA Method SW-846 and the samples were analyzed by a Certified Laboratory and that the appropriate chain of custody was attached. I further certify that the wastes submitted for disposal are not designated as Hazardous Waste by the USEPA or state regulations.

Printed Name: Padraic W. Quinn Company Name: Port of Portland
Signature: Padraic W. Quinn Title: Enviro & Safety Affairs Mgr. Date: 4/18/95