Removal Preliminary Assessment

For The

Big Blue Mill Site

Kernville Ranger District Sequoia National Forest



February 10, 2020

Prepared by: Noelle Graham-Wakoski, P.E. On-Scene Coordinator Pacific Southwest Region USDA Forest Service

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1.0 LOCATION

The Big Blue Mill Site (Site) is a former gold ore processing facility dating back to the 1860s that was associated with the nearby historic Big Blue and Summer group of mines. The Site is located in Section 27, Township 25 South, Range 33 East, Mount Diablo Meridian, on the western bank of the North Fork of the Kern River (River) – a tributary feeding into Lake Isabella within Kern County, California (see Figure 1). The Site is located on both private and national forest system land under the jurisdiction, custody and control of the U.S. Department of Agriculture Forest Service (Forest Service), within the Sequoia National Forest, Kern River Ranger District.

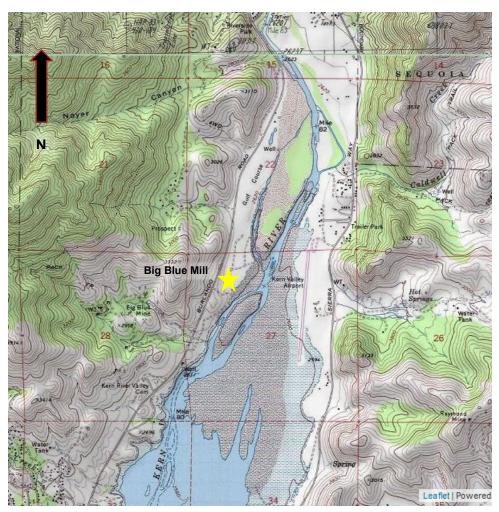


Figure 1: Location of the Big Blue Mill Site on the western bank of the Kern River above Lake Isabella, Kern County

The Site is located approximately 2 miles south of Kernville, California and can be accessed by taking California State Highway 178 east from Bakersfield toward Lake Isabella, California. Then turn left and head north on Highway 155 toward Wofford Heights. Continue north on Highway 495 (Burlando Road) toward Kernville for approximately three miles to the Site on the right side, which is approximately 800 feet east of the road toward the Kern River. The preferred access to the Site within Forest Service land is via the abandoned golf course just south of downtown Kernville. This path entails a one-mile travel on single lane track. The north end of the Site is the northern portion of the mill building foundations and the south end of the Site is just beyond the ragged peak along the shoreline of the Kern River.

2.0 BACKGROUND

2.1 Site History

The Big Blue Mill Site, also referred to as the "Sumner Mill" in some historic reports, is a former gold ore processing facility dating back to the 1860s that was associated with the nearby historic Big Blue and Summer group of mines. The Big Blue and Sumner group of mines are located southwest of the Site (see Figure 1) and were part of the historic Cove Mining District on the west side of the Kern River Valley. The September 15, 1896, Thirteenth Report of the State Mineralogist, for the California State Mining Bureau, indicates that there were multiple mining claims associated with mill site, these being the Big Blue, Commonwealth, Content, Nelly Dent, Nelly Dent Extension, Sumner, and Summer 5 Extensions (Beauregard, Bull Run, Frank, Jeff Davis, Lady Bell, and Urbana). According to the January 1940 "Volume 36 California Journal of Mines and Geology", the gold vein mined by these mines was first discovered in 1860.

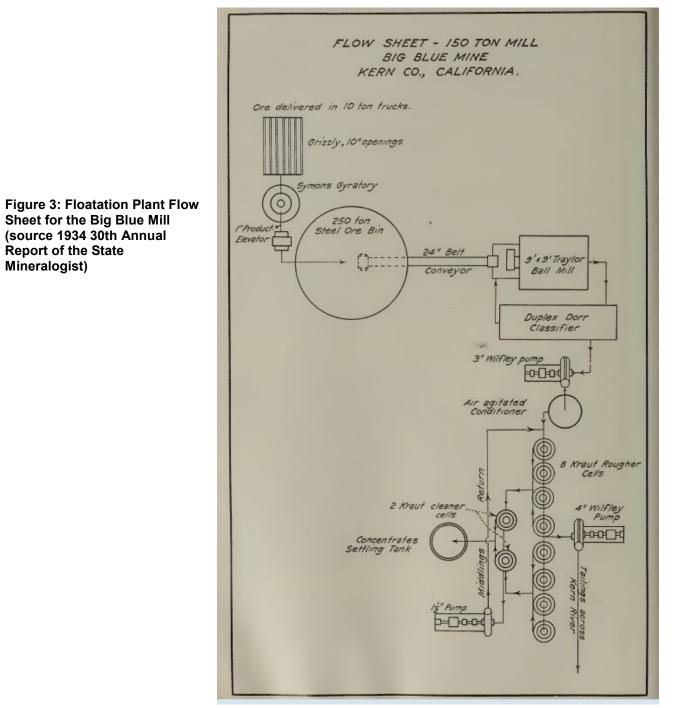
Historic records from the California State Division of Mines indicate that mineral processing operations were conducted at the site dating back to the 1860s. At least four different mineral processing operations occurred at the Site, including: a 16-stamp mill from approximately 1867 through the mid-1870s, an 80-stamp mill from 1875 through 1883, a 10-stamp mill from approximately 1901 through 1932, and floatation plant and ball mill from 1934 – 1943. Records stated that the 80-stamp mill was the largest of its kind at the time.

The 1888 "Eighth Annual Report of the State Mineralogist" described the 80-stamp mill as follows: "It is an eighty-stamp mill. Built in 1874 and 1875 and was run by a 56-inch turbine water wheel. The ore from the mine was dumped from five-ton cars into a 60-ton bin, or bunker, whence it fell and went through a 15 by nine jaw-crusher of peculiar lever construction and thence dropped into small cars running on a tramway the whole length of the building. From these cars it was dumped by hand into the separate hoppers of the automatic feeders, one to each battery of five stamps. From the batteries the pulp went to Hendy concentrators, one to each battery. Later on, two of the Hendy concentrators were replaced by four Frue vanners. Below the concentrators and vanners, there are six pans and three large settlers. Tailings were allowed to run into the river. The whole eighty stamps are said to have been run continuously for some two years, after first starting up in the spring of 1875. After that, the mill ran spasmodically, with more or less stamps at a time, up to the date of its final substantial stoppage in November, 1883."



Figure 2: Big Blue Mill Site on the west bank of the Kern River (date is unknown but thought to be from the 1870s era)

According to several Annual Reports of the State Mineralogist, up until the 1930s, tailings and other materials from the mill operations were dumped into the Kern River and most washed down stream. In the early 1930s, the flotation plant and ball mill was installed at the site (1934 30th Annual Report of the State Mineralogist) from which point tailings from the processing operations were pumped across the Kern River and deposited into a tailings pond. The 1934 30th Annual Report of the State Mineralogist for the California Division of Mines lists the size of the floatation plant at 150 -ton.



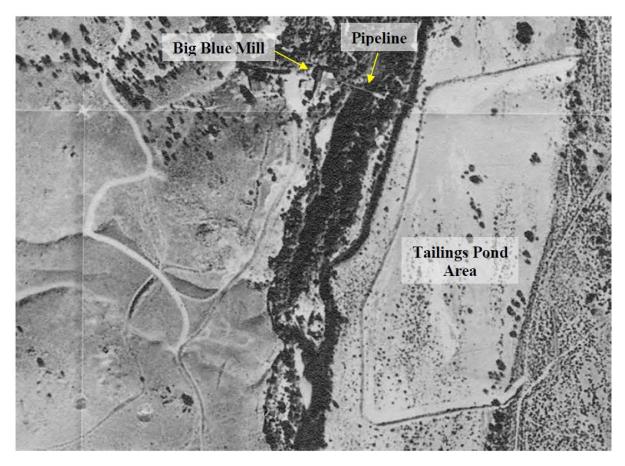


Figure 4: October 20, 1938 Aerial photo showing Big Blue Mill, pipeline, and tailings pond area



Figure 5: Big Blue Mill Circa pre-1940 (source January 1940, Vol 36 California Journal of Mines and Geology)

The Big Blue Mill operated up until 1943 when it was shut down during World War II as a result of Order L 208 of the War Production Board. Order L 208, issued by the War Production Board gave priority to copper mining, which had useful military implications, and labeled gold mines as "nonessential" for purposes of the war effort. As such, Order L-208 prohibited mining of "nonessential" materials. The 1962 report "Mines and Mineral Resources of Kern County, California" by the California Division of Mines and Geology states that Order L208 caused the mine to be shut down permanently.

2.2 Current Land Status

In 1948, US Army Corps of Engineers (USACE) began construction of the Lake Isabella Dam and reservoir project. In 1954, to complete the reservoir project, the USACE acquired all land below elevation 2617 feet. This included Big Blue Mill site which was at a lower elevation than the spillway of Lake Isabella dam. In 1957, the mill was sold at auction, and removed to New Mexico (California Division of Mines and Geology, 1962)

In 1991, in order to ensure ongoing public access to recreational activities along the river, this USACE floodplain land area was exchanged, from the USACE to the USDA Forest Service.

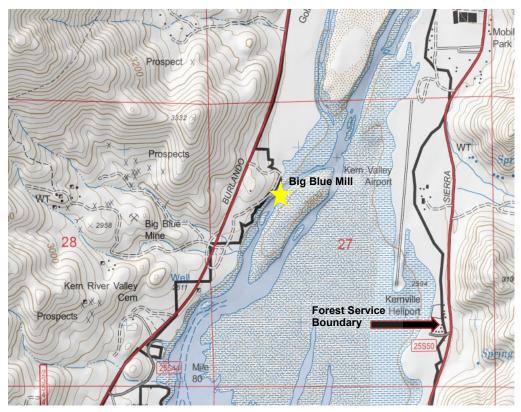


Figure 6: Current Forest Service land boundary

2.3 Current Land Use

The site is immediately adjacent to the Kern River which is a popular recreation area for fishing and water sports. The banks of the Kern River are reportedly popular fishing locations and some of the tailing materials encompass a common fishing platform and are bisected by a user created, well developed 'fishermen's trail' leading up from the south. There are also permitted commercial rafting corridors along the Kern River allowing access whereby recreational rafters may readily climb up on the shoreline in this location. There is an occupied single-family private residence within 100 feet of the Site. The home sits immediately adjacent to the posted private property-National Forest land boundary. There are two other parcels with homes at an approximate distance of 500 feet and 1,000 feet respectively from the Site. It is unknown at this time whether there are children living in these homes. This portion of the River has been determined to be eligible as a Wild & Scenic river byway for permitted, non-permitted and commercial recreational use. The Kern River Valley Chamber of Commerce holds an annual Lake Isabella Fishing Derby for the public every April. This event likely draws huge crowds along the north fork of the Kern River and south/downriver to Lake Isabella.

3.0 PREVIOUS INVESTIGATIONS

No previous investigations have been performed at the location of the former Big Blue Mill. The Forest Service has conducted several investigations of the former tailings pond area which is located across the Kern River from the former mill site (see Figure 4 above). The former tailings pond area is referred to as the "Kern Floodplain Site". Previous investigations associated with the Kern Floodplain Site include the following:

- February 2011, Investigation Results for Suspected Big Blue Mine Tailings between the Kern Valley Airport Campground and the Kern River by Jerome DeGraff, Forest Service
- January 2013, Kern Floodplain Site Sequoia National Forest, Site Inspection Summary Report, Weston Solutions
- October 2016, Final Engineering Evaluation and Cost Analysis, Kern Floodplain Site, ECM Consultants
- May 2018, Potentially Responsible Party Search Final Report, Kern Floodplain Site, ECM Consultants

3.1 Kern Floodplain Site Investigation Summary

The Kern Floodplain Site is the location of the former tailings pond area for the Big Blue Mill. Historic records indicate that tailings from the Big Blue Mill were deposited at the Kern Floodplain Site from approximately 1934 through 1943. The Kern Floodplain site is approximately 4.1 acres in size and is located directly across the Kern River from the Big Blue Mill Site.

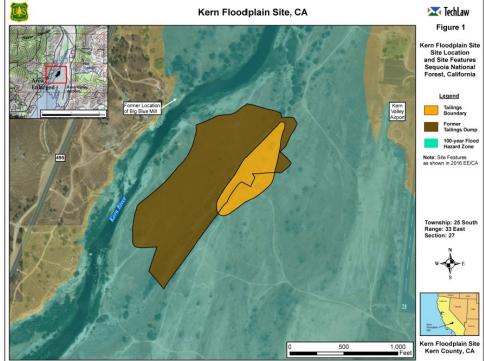


Figure 7: Kern Floodplain Site Tailings Delineation Forest Service site investigation efforts at the Kern Floodplain site found elevated levels of arsenic, cadmium and lead present in the mill tailings. With arsenic concentrations peaking at 4,200 mg/kg, lead at 220 mg/kg and cadmium at 4.7 mg/kg.

Sample Location	Sample Depth	Arsenic (mg/kg)	Cadmium (mg/kg)	Lead (mg/kg)
Trench 1	0.5	640	1.6	0.12
Trench 1	2	1,500	3.3	0.1
Trench 1	1	2,300	4	0.56
Pothole 11	1	1,300	1.6	46
Trench 2	3	120	3.3	15
Trench 2	4	100	4	3.4
Trench 2	1.5	2,800	2.8	61
Trench 2	8	37	0.29	2.6
Trench 2	8	190	0.072	7.4
Trench 2	4	130	3.3	7.2
Trench 2	0.5	160	0.088	14
Trench 3	3	3,900	0.34	190
Trench 3	3	3,700	0.25	180
Trench 3	4	240	0.94	11
Trench 3	7	190	3.5	6.6
Trench 5	4	130	3.3	3.1
Trench 5	4	120	0.22	3.2
Pothole 15	0.5	4.5	0.11	2.7
Pothole 15	3	4.3	0.091	2.2
Pothole 16	0.8	940	3.6	46
Pothole 16	2	6.6	0.079	2.2
Pothole 18	0.8	14	0.14	3
Pothole 18	2.5	4.4	0.091	2.4
Pothole 20	0.25	17	0.46	5.2
Pothole 20	2.5	3.2	0.063	3.3
Pothole 21	1.5	4,200	4.7	220
Pothole 21	4	62	0.16	4.4
Pothole 22	0.5	15	0.26	4.5
Pothole 22	1.5	5.5	0.17	3.4
Pothole 23	0.6	22	0.82	6.2
Pothole 23	3	6.2	0.16	2
Background		5.64	0.15	16.24
TTLC		500	100	1,000

Table 9: Summary of Analytical Results by Sample Location

Notes:

Italicized text denotes concentration exceeds site-specific background. Bold text denotes concentration exceeds the Total Threshold Limit Concentration (TTLC).

Figure 8: Summary of arsenic, lead and cadmium levels present in tailings at the Kern Floodplain Site (source October 2016 Final Engineering Evaluation and Cost Analysis Report, Kern Floodplain Site)

4.0 BIG BLUE MILL SITE INVESTIGATION

On October 17, 2019, an initial site visit was made to the former Big Blue Mill Site to assess whether there was a tailings deposit near the former mill site. The site was chosen because of its historical connection to the tailing materials discovered in 2011 in the floodplain on the east side of the Kern River. Initial screening with a field X Ray Fluorescence (XRF) revealed elevated arsenic and lead levels in deposits along the bank. Arsenic levels ranged from 95

milligrams per kilogram (mg/kg) to 97,592 mg/kg and lead levels ranged from 35 mg/kg to 7,539 mg/kg. Based on these initial results a follow-up assessment was planned to further assess site contamination and potential risks.

The follow-up site assessment was conducted on January 14, 2020 by Forest Service On-Scene Coordinators (OSCs), Rick Weaver and Noelle Graham-Wakoski using two separate field XRF field instruments to better delineate the full range of contaminants at the Site.

During the October 2019 visit, the Big Blue Mill site was accessed by foot from the abandoned golf course on National Forest land north of the private property from Burlando Road. For the January site visit, Forest Service employees were accompanied by a Law Enforcement officer, who had previously contacted the occupant of the northern parcel residence. Permission was granted to the Forest Service to park vehicles along the private driveway and to walk down toward the former mill site from above.

4.1 Current Site Conditions

The only physical evidence remaining at the site of the former mill structures are concrete foundations and dilapidated retaining walls. The area is strewn with driftwood and other river debris and indicates that the site has been subject to periodic flooding.



Figure 9: Concrete foundations that once supported structures and processing equipment at the Big Blue Mill. Photo taken from across the Kern River shows the proximity of nearby residences to the foundations that once supported site structures and processing equipment.

The mill foundation and tailings materials are located within 100 feet of the northern parcel single-story residence that was constructed up to the public/private property boundary in the early 2000s (Figures 9 and 10). Given the large footprint of the former Mill structures, there is the potential that the home foundation is immediately adjacent, if not on top of the footprint of the former mill structures. Two other residential dwellings are located within 500 and 1,000 feet of the site. Trash and other evidence of human visitation to the Site is present throughout the area.



Figure 10: Approximate location of the former mill relative to nearby residences and the Kern Floodplain Site

Fishing is very popular along the Kern River from the shoreline. A well-used 'Fishermen's Trail' exists through the Site and a fishing platform was observed on the heavy metal impacted tailing materials at the shoreline. The west bank of the Kern River near the former site is heavily eroded although pockets of tailing deposits remain. The east side of the river is lined with cottonwoods, locust and willow trees. Along the shoreline there is clear evidence of tailings deposits, likely to be mineral processing wastes from the former mill operations. (Figures 11, 12).



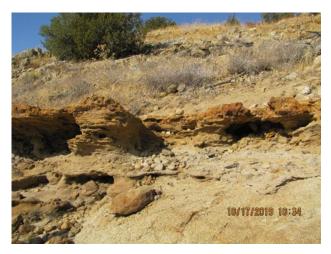


Figure 11: Rust colored tailings and mineral processing deposits along the Kern riverbank below the former mill.





Figure 12: Deposits of very fine white powdery material along the riverbank (left) and brown silty materials below the former mill foundation (right) where elevated arsenic, lead and mercury were found.



Figure 13: Fishing platform on river bank comprised of mill tailing deposits below the former mill site.

4.2 Site Sampling

Field screening was conducted using a Thermo Scientific Niton Model XL3t-600 and an Olympus Delta Model DS-4000 handheld X-Ray Fluorescence analyzer. XRF sampling was performed by Forest Service OSCs along the areas with visible evidence of tailings along the streambank and near foundation of the former mill. A total of 31 locations throughout the former mill site were sampled, including one (1) up gradient location for site background (Figure 14).



Figure 14: January 14, 2020, XRF (sample Locations 429-445 taken by the Thermo Scientific Niton Model XL3t-600 and sample numbers 3-22 by the Olympus Delta XRF Model DS-4000).

Prior to conducting sampling, both XRFs were field calibrated in accordance with manufacturer specifications and checked to ensure they were set to the same analysis mode. XRF readings were taken using a 60 second acquisition time period. Materials in several locations were also analyzed by both instruments in order to assess the variability between the two XRF devices.

Nine (9) soil samples were taken around the site in locations with the highest XRF reading for laboratory confirmation sampling. Samples were drawn using a steel hand shovel and placed into new sample bags and immediately labelled with a sharpie pen with the corresponding XRF instrument auto numbered identifier shot on that sample bag. Full sample description labels were created with sampler name, sample date, sample identifier, and project information following the field visit. Samples were sent to Babcock Laboratories in Riverside, California - a California and National ELAP accredited laboratory for analysis.

4.3 Site Sampling Results

XRF values obtained during this assessment indicate that contamination is present at the Site as a result of historic mineral processing activities. XRF results are provided below in Table 1. Initial screeing results point to arsenic, lead, mercury and zinc initial constituents of concern.

	Mercury, mg/kg Motybdenum, mg/kg Nickel, mg/kg Selenium, mg/kg Silver, mg/kg Zinc, mg/kg	r XRF +/-Var XRF +/-Var XRF +/-Var XRF XRF		4 4 9 9 9 9 9		ND 38 ND 5	117 ND 221 ND 80 311 97	300,000 ND 88 ND 32 40	ND 212 ND 78 311	ND 58 ND 12 88	22 ND 79 ND 10 10 115 28	ND 62 ND 14 70	15 ND 66 ND 13 153 26	ND 50 ND 6 155	410 410 410		25 ND 69 ND 19 194 33		0 31 0 27 0 159 120 10		115 29 3 ND 31 ND 17 219 11 648 35	50 14 2 ND 19 ND 10 131 8 369 20	107 33 3 ND 28 ND 16 210 11 624 33	94 20 3 ND 27 ND 16 226 11 593 31	11 4 1 ND 10 ND 3 11 5 51 7	36 3 1 3 8 29 3 167 5 126 8	ND 4 26 5	0 40 0 25 0 218 119 7	10 ND 3 8 5	132 32 4 ND 36 ND 21 295 13 1,041 47	73 36 3 ND 32 ND 19 299 13 437 33	21 9 2 ND 13 11 6 86 6 239 13	14 6 1 ND 9 1 4 47 5 279 10	12 3 1 32 9 ND 3 15 5 137 8	4 5 1 43 7 7 1 ND 4 89 6	78 41 4 ND 40 ND 23 292 15 296 38	4 1 15 7 1 1 6 4 151 6	7 3 1 ND 4
Summary of XRF Data	Copper, mg/kg Lead, mg/kg	r XRF +/- Var XRF +/- Var		20 20 20 20 20	6 00 21 200 29 VID 24	ND 23 ND 7	870 ND 141 3,356 170 1,183	231 ND 59 3,326 190 ND	5 ND 134 3,144 161	ND 35 723 38	287 ND 57 83 18 ND	ND 39 972 45	334 53 30 420 31 26	34 90 14	22 232 03	0+2'T CC 00/ 00 /NI 07C	289 ND 46 1,592 62 149		92 0 34 12,513 131 ND	ND 36 3,520 65 3,653	ND 49 2,129 55 3,694	ND 32 2,229 41 1,673	ND 45 2,336 57 3,570	ND 44 2,733 62 3,016	11	33 15 4,954 54 2,642	1,857 25 1	168 0 29 6,328 65 ND	ND 16 540 10 607	ND 56 3,761 96 3,896	ND 52 8,257 186 846	ND 22 1,877 29 156	ND 17 1,356 19 220	61 16 910 13 287	68 12 124 4 53	ND 64 2,479 74 ND	78 13 91 3 10	2
Table 1: Su	Cadmium, mg/kg Chromium, mg/kg Cobalt, mg/kg	XRF +/- Var XRF +/- Var	m	117 000	0 01 71 0 01 0 01 0 01 0 01 0 01 0 01 0	326 29 8	ND 176 58 24 2,208	ND 1,270 371	88	279 58 26	331 44	20	78 24 ND	DN	2		40 21 ND		9 11 ND 97 1,331	11 8 ND 49	ND 10 ND 86	14 10 ND 79	6 5 38 27	5 5 8 22	0 6 45 30	334 28 120 37	6 ND	31 11 ND 111 0	43 11 ND 104	11 6 10 35	6 5 ND 26	ND 5 ND 24	6 4 75 20	14 13 ND 131	9 4 43 18	ND 5 67 20		
	Arsenic, mg/kg Antimony, mg/kg Barium, mg/kg	ar XRF +/- Var			3 6 ND 707 ND	6 ND 207 ND	143,314 864 ND 494 ND 1,468	116,272 4,338 455 83	832	-	249 25 ND 401 ND 1,257	3 123 ND 724	8,946 108	953 32		17,033 304	22,579 185		217,719 1,637 695 54 ND 342		172,971 3,667 147 21 ND 321	83,419 1,276 65 15 ND 295	159,533 3,240 139 20 424 113	152,928 2,985 143 20 305 91	10,924 118 5 11 217 119	5,710 62 23 10	184 14 11 370	54,136 371 1,136 41 ND 419	8,774 97 ND 11 ND 364	207,984 4,720 182 22 ND 139	181,752 3,890 122 21 491 108	46,355 581 81 13 363 101	18,749 200 47 11 544 85	9,303 96 33 10 ND 463	133 4 ND 9 270 70	239,639 6,021 727 34 854 86	2,484 24 20 9	15 2 10 9
	Big Blue Mill Ars		Aodel XL3t-600	ilings on top, brown silty at			431 -fine, silty, brown-center of site ⁵ 143,		lumpy, easily breakable		rown	mid bank on South end	440-south end 8,9	441-fine, silty, brown-bank area on south end 95	Ity, brown-below mill foundation,	10101 Ellar 445-crist colored ir liimov herdened-helow		S-4000	3-North White Tailings 217,	4-North White Tailings 103,	5-North White Tailings 172,	6-white Tailings 83,4	7-Sample Bag 159,	8-Sample Bag ³ 152,		10-South White Tailings 5,7		12-Red Conglomerate 54,1	13-Red Conglomerate 8,7	14-South Rocky Point* 207,	q	16-Riverbank, Mill Bldg. 46,3	17-Yellow Chunk 18,7	18-NW Mill Bldg./Riverbank 9,3	19-Floodplain North Side 13	20-East Mill Bldg. Foundation 239,	21-East Mill Bldg. Foundation 2,4	22-Background

Levels of arsenic, lead, mercury, and zinc (CERCLA hazardous substances) greatly exceed site background levels, as shown in Table 2 below and indicates that a release of hazardous substances to the environment has occurred as a result of historic mineral processing operations.

Table 2: Summary of XRF Arsenic, Lead, Mercury, and Zinc Concentrations Compared to Site
Background Levels

	Arsenic (mg/kg)	Lead (mg/kg)	Mercury (mg/kg)	Zinc (mg/kg)
XRF Detection Range	ND - 239,639	ND - 12,513	ND - 3,896	ND - 1,047
Site Background (sample 22)	15	21	8	42
Site Background Exceedance	0x - 15,975.9x	0x - 595.9x	0x - 487x	0x - 24.9x

To assess field instrument consistency, soil sample 8 was analyzed by both XRF devices. The readings of the two machines are compared below in Table 3.

XRF Device	Arsenic mg/kg	Lead mg/kg	Mercury mg/kg	Zinc mg/kg
Olympus Delta Model DS- 4000	152,928	2,733	3,016	593
Thermo Scientific Niton Model XL3t-600	143,314	3,356	1,183	311
Relative percent difference	6.5	20.5	174.6	62.4

Table 3: Field XRF Consistency Samples

The variation between the two separate XRF instruments range from 6.5 percent for arsenic to 174.6 percent for mercury and 62.4 for zinc. While the variance results seems to vary greatly between the two instruments, both results confirm the trend of elevated metals. The low relative percent difference for arsenic between the two instruments demonstrates a higher confidence of an elevated concentrations detected at the Site.

Laboratory results for the ten (10) samples sent off for laboratory analysis are provided in Appendix A. It is believed that the sample preparation method utilized by the laboratory did not provide for a full extraction of the metals from the samples. Resulting in lower reporting and not providing a correct correlation with the XRF data. The laboratory results, summarized in Table 3, do confirm that arsenic, lead and mercury are present in concentrations significantly above background levels and that a release of hazardous substances has occurred as a result of historic mineral processing operations.

 Table 3: Summary of Laboratory Arsenic, Lead, Mercury, and Zinc Concentrations Compared to

 Site Background Levels

	Arsenic (mg/kg)	Lead (mg/kg)	Mercury (mg/kg)	Zinc (mg/kg)
Laboratory Analytical Results	400 - 60,000	50 - 8,300	5 - 1,500	25 - 180
Site Background (sample 22)	15	21	8	42
Site Background Exceedance	26.7x - 4,000x	2.4x - 395.2x	0.6x - 187.5x	0.6x - 4.3x

4.4 Human Health Risk Screening Assessment

Exposure pathways of concern for the Big Blue Mill Site are through inhalation, dermal exposure and ingestion by site visitors. Contamination is present within 100 feet from an occupied residence on private land and within 500 feet and 1,000 feet of two other residences on separate private parcels. Mill waste and tailings are present in powdery surface deposits and soils and there is a high likelihood of transferring contamination to clothing, equipment and vehicles that would result in contaminated material being transported and deposited at off-site locations such as residences and offices. Fishing is very popular along the Kern River from the shoreline. A well-used 'Fishermen's Trail' exists through the Site and a fishing platform was observed on the heavy metal impacted tailing materials at the shoreline (Figure 13). The close proximity of occupied residences to the site and the high recreational usage of the area increase the likelihood of exposure of children to contaminants. Children are considered a sensitive group upon which exposures to heavy metals could interfere with neurological development.

Arsenic, lead, and mercury concentrations at the Site greatly exceed established human health risk screening levels (SLs). Screening levels are concentrations of chemicals in soil intended to be protective of human health and/or the environment under a defined exposure setting (Cox, 2017 Update). They represent heavy metal concentrations thresholds at which people, under varying exposure levels, will not experience adverse health effects during their lifetimes.

The most widely used human health screening values are the Regional Screening Level (RSLs) developed by the US EPA for residential and industrial populations

(https://www.epa.gov/risk/regional-screening-levels-rsls-generic-tables). EPA RSLs are based on a residential exposure frequency of 350 days/year for 26 years and the industrial RSLs assume worker exposure frequency of 225 days/year for 25 years. These residential and industrial exposure frequencies are very conservative for many abandoned mine land (AML) sites. Recreational visitors are the most common group of human receptors to AML sites. This is a broad category that can cover a range of possible recreational activities, including camping, hiking, hunting, biking, ATV riding, horseback riding, etc.

To address recreational visitation at AML sites, the Bureau of Land Management (BLM) developed recreational exposure SLs for metals found in soils at AML sites. BLM's recreational SLs take into account the reduced exposures associated with most recreational activities and are based on a recreational exposure frequency of 14 days/year for 26 years (Cox, September 2017 update).

Although highly conservative for most AML sites, EPA's RSLs provide a useful benchmark in gaining an initial understanding of the magnitude of potential risk and at sites where off-site residents live in immediate proximity of the contamination. In the case of the Big Blue Mill site, residential property is immediately adjacent to the former mill site and an occupied residential home is located within 100 feet of identified site contamination. Two other occupied residences are located within 500 and 1,000 feet of site contamination (see Figures 9, 10 and 14). Given the close proximity of occupied residences to the site, the use of EPA residential RSLs is warranted in assessing potential site risks.

A summary of arsenic, lead, and mercury concentrations compared to EPA residential RSLs and BLM recreational SLs is provided in Table 4 below and a comparison to the laboratory results is provided in Table 5.

Table 4: Summary of XRF Arsenic, Lead, and Mercury Concentrations Compared To Human Health Screening Levels

	Arsenic (mg/kg)	Lead (mg/kg)	Mercury (mg/kg)
XRF Concentration Range	ND - 239,639	ND -12,513	ND - 3,896
EPA Residential RSL ¹	0.68 ²	400	11
EPA Residential RSL Exceedance	0x - 352,410.3x	0x - 31.3x	0x - 354.2x
BLM Recreation SL ³	30.6	800	271
BLM Recreation SL Exceedance	0x - 7,831.3x	0x - 15.6x	0x - 14.4x

¹ (https://www.epa.gov/risk/regional-screening-levels-rsls-generic-tables)

² Arsenic detected in background sample at 15 mg/kg.

³ September 2017 Update, BLM Technical Memorandum: Screening Assessment Approaches for Metals in Soil at BLM HazMat/AML Sites

Table 5: Summary of Laboratory Arsenic, Lead, and Mercury Concentrations Compared To Human Health Screening Levels

	Arsenic (mg/kg)	Lead (mg/kg)	Mercury (mg/kg)
Laboratory Concentration Range	400 - 60,000	50 - 8,300	5 - 1,500
EPA Residential RSL ¹	0.68	400	11
EPA Residential RSL Exceedance	588.2x - 88,235.3x	0.1x - 20.8x	0.5x - 136.4x
BLM Recreation SL ²	30.6	800	271
BLM Recreation SL Exceedance	13.1x - 1,960.8x	0.06x - 10.4x	0.0x - 5.5x

¹ (https://www.epa.gov/risk/regional-screening-levels-rsls-generic-tables)

² September 2017 Update, BLM Technical Memorandum: Screening Assessment Approaches for Metals in Soil at BLM HazMat/AML Sites

Arsenic, lead, and mercury concentrations greatly exceed residential and recreational exposure screening levels. Exceedances of the SLs can be interpreted as follows in order to provide a means for assessing the hazard posed by the presence of heavy metals:

- Less than the criteria: low risk
- 1-10 times the criteria: moderate risk
- 10-100 times the criteria: high risk
- >100 times the criteria: extremely high risk

The range of detected arsenic concentrations indicate the Site poses a potential extremely high risk for arsenic under recreational and residential exposure scenarios. XRF screening found arsenic concentrations in surface materials ranging from 133 to 239,639 mg/kg. Greatly exceeding residential and recreational exposure SLs (Table 4). Laboratory results, provided in Table 5, confirm that arsenic concentrations exceed EPA residential RSLs and BLM recreational SLs and that the Site poses potential extremely high risk for arsenic under recreational and residential exposure routes of concern for arsenic would primarily be through the inhalation, ingestion, and dermal pathways.

XRF lead concentrations ranged from 83 to 12,513 mg/kg, indicating the Site poses a potential high risk for lead under recreational and residential exposure scenarios. Laboratory results, provided in Table 5, confirm that lead concentrations exceed EPA residential RSLs and BLM recreational SLs and that the Site poses a potential exposure high risk to recreational and

residential visitors for lead. The exposure routes of concern for lead would primarily be through the ingestion and inhalation pathways.

XRF mercury concentrations ranged from 26 to 3,896 mg/kg, indicating the Site poses a potential extremely high risk for mercury under the residential exposure scenarios and a high exposure risk under the recreational exposure scenario. Laboratory results, provided in Table 5 confirm that lead concentrations exceed EPA residential RSLs and BLM recreational SLs and that the Site poses a potential extremely high risk for mercury under the residential exposure scenario. The exposure routes of concern for mercury would be the inhalation, ingestion, and dermal pathways.

4.5 Ecological Risk Screening Assessment

To assess potential risks to wildlife posed by contamination present at the site, XRF and laboratory data was compared to EPA Ecological Soil Screening Levels (Eco-SSLs). Eco-SSLs are concentrations of contaminants in soil that are protective of ecological receptors that commonly come into contact with soil or ingest biota that live in or on soil. Although Eco-SSLs were developed specifically to be used during Step 2 of the Superfund ecological risk assessment process (Screening-Level Exposure Estimate and Risk Calculation), they can be used during the site screening process to screen soil contaminants in order to determine if additional ecological site studies are warranted.

Tables 6 and 7 below list the primary constituents of concern from the site XRF and laboratory data which exceed EPA Eco-SSLs.

	Antimony (mg/kg)	Arsenic (mg/kg)	Barium (mg/kg)	Cadmium (mg/kg)	Chromium (mg/kg)	Copper (mg/kg)	Lead (mg/kg)	Selenium (mg/kg)	Silver (mg/kg)	Zinc (mg/kg)
XRF Concentration	ND -	133 -								51 -
Range	1,136	239,639	ND - 937	ND - 334	8 - 289	ND - 78	83 -12,513	ND - 477	ND - 295	1,047
Plant ECO-SSL ¹	NA ²	18	NA ²	32	NA ²	70	120	0.52 ³	560	160
Plant ECO-SSL		6.3x -					0.7x -	0x -		0.3x -
Exceedance		13,313.3x		0x - 10.4x		0x - 1.1x	104.3x	917.3x	0x - 0.5x	6.5x
Soil Invertebrates										
ECO-SSL	78	NA ²	330 ³	140	NA ²	80	1700	4.1	NA ²	120
Soil Invertebrates										
ECO-SSL								0x -		0.4x -
Exceedance	0x - 14.6x	-	0x - 2.8x	0x - 2.4x		0x - 1x	0.0x - 7.4x	116.3x		8.7x
Avian Wildlife ECO-										
SSL	NA ²	43	NA ²	0.77	26 ³	28	11 ³	1.2 ³	4.2	46
Avian Wildlife ECO-		3.1x -		0x -			7.5x -	0x -		1.1x
SSL Exceedance		5,573x		433.7x	0.3x - 11.1x	0x - 2.8x	1,137.5x	397.5x	0x - 70.2x	22.8x-
Mammalian Wildlife										
ECO-SSL	0.27 ³	46	2000	0.36	34 ³	49	56	0.63 ³	14	79
Mammalian Wildlife										
ECO-SSL	0x-	2.9x -		0x -			1.5x -	0x -		0.6x -
Exceedance	4,207.4x	5,209.5x	0x - 0.5x	927.8x	0.2x - 8.5x	0x - 1.6x	223.4x	757.1x	0x - 21.1x	13.3x

Table 6: Summary of XRF Concentrations for Constituents Exceeding Ecological Screening Levels

¹ EPA Ecological Soil Screening Levels (ECO-SSLs) (https://www.epa.gov/chemical-research/interim-ecological-soil-screening-level-documents)

² NA = Not Available

³ECO-SSL Below Site XRF Background Concentrations

	Antimony	Arsenic	Cadmium	Lead	Selenium	Silver	Zinc
	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)
Laboratory							
Concentration		400 -		50 -			
Range	ND - 38	60,000	ND - 334	8,300	ND - 5.5	ND - 82	51 - 1,047
Plant ECO-SSL ¹	NA ²	18	32	120	0.52 ³	560	160
		6.3x -					
Plant ECO-SSL		13,313.3		0.7x -			
Exceedance		Х	0x - 10.4x	104.3x	0x -10.6x	0x - 0.1x	0.3x - 6.5x
Soil Invertebrates							
ECO-SSL	78	NA ²	140	1700	4.1	NA ²	120
Soil Invertebrates							
ECO-SSL				0.0x -			
Exceedance	0x - 14.6x	-	0x - 2.4x	7.4x	0x - 1.3x		0.4x - 8.7x
Avian Wildlife							
ECO-SSL	NA ²	43	0.77	11 ³	1.2 ³	4.2	46
Avian Wildlife							
ECO-SSL		3.1x -	0x -	7.5x -		0x -	1.1x
Exceedance		5,573x	433.7x	1,137.5x	0x - 4.6x	19.5x	22.8x-
Mammalian							
Wildlife ECO-SSL	0.27 ³	46	0.36	56	0.63 ³	14	79
Mammalian							
Wildlife ECO-SSL	0x-	2.9x -	0x -	1.5x -			0.6x -
Exceedance	4,207.4x	5,209.5x	927.8x	223.4x	0x - 8.7x	0x -5.9x	13.3x

 Table 7: Summary of Laboratory for Constituents Exceeding Ecological Screening Levels

¹ EPA Ecological Soil Screening Levels (ECO-SSLs) (https://www.epa.gov/chemical-research/interim-ecological-soilscreening-level-documents)

² NA = Not Available

³ECO-SSL Below Site XRF Background Concentrations

Initial site screening indicates that levels of antimony, arsenic, lead and zinc greatly exceed both site background levels and EPA Eco-SSLs. Mill waste and tailings are present in powdery surface deposits and soils and are readily accessible to wildlife. Some of the contaminated materials are un-vegetated and exposed on the banks of the Kern River and there is evidence of on-going erosion into the river. Additional ecological risk evaluation is warranted in order to fully assess the risks to wildlife posed by the Site.

5.0 CONCLUSIONS AND RECOMMENDATIONS

XRF values obtained during the Removal PA indicate that contamination is present as a result of historic mineral processing activities at the Site. Elevated concentrations of arsenic is present in mill tailings exceed site background levels (up to 13,866x for arsenic, 393x for lead, and 487x for mercury) and indicates that a release of hazardous substances to the environment has occurred. The tailings are susceptible to migration because of water- and wind-borne influences. Mill waste and tailings are present in surface deposits and soils and are susceptible to migration because of water- and wind-borne influences. Some of the contaminated materials are un-vegetated and exposed on the banks of the Kern River and there is evidence of on-going erosion into the river.

Concentrations of arsenic, lead, and mercury in the mill tailings greatly exceed established human health risk screening thresholds for residential and recreational exposure scenarios and indicate that the site poses an exposure hazard to nearby populations. Contamination is present within 100 feet from an adjacent occupied residence on private land and within 500 feet and 1,000 feet of two other residences on separate private parcels. There is evidence of public visitation to the site and the area along the river bank where tailings are present is used by the public for fishing. Mill waste and tailings are present in powdery surface deposits and soils and there is a high likelihood of transferring contamination to clothing, equipment and vehicles that would result in contaminated material being transported and deposited at off-site locations such as residences and offices. Mill tailings are also readily accessible to wildlife.

A full CERCLA Site Inspection (SI) is recommended in order to delineate the full nature and extent of contamination and human health and ecological risks posed by the Site.

Conditions represent a threat of release of CERCLA hazardous substances, threatening to public health, or welfare, or the environment based on the factors set forth in the NCP, 40 CFR § 300.415(b)(2). A Time-Critical Removal Action (TCRA) is recommended to implement institutional controls to restrict all public access to the Site and the area of contamination. It is recommended that these controls include a prohibition on all public entry to the Site. Based on available data, the recommended initial closure area includes former mill area east and northeast of the adjacent private Parcel APN 296-110-11-00-1 and the area between the Kern River and private Parcels APN 296-110-11-00-1 and 296-110-12-00-4 (see Figure 15 below).

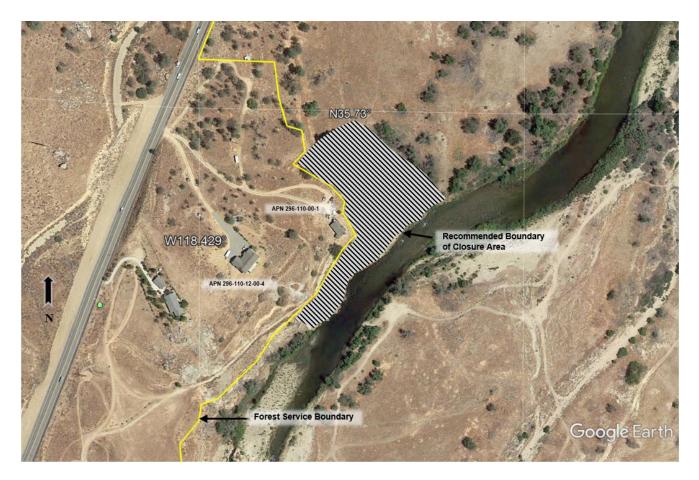


Figure 15: Recommended Closure Area

References Cited

September 15, 1896, Thirteenth Report (Third Biennial) of the State Mineralogist For The Two Years Ending September 15, 1896, California State Mining Bureau

January 1934, Volume 30 California Journal of Mines and Geology Quarterly Chapter of State Mineralogist's Report XXX, State Division of Mines

January 1940, Volume 36 California Journal of Mines and Geology Quarterly Chapter of State Mineralogist's Report XXXVI, State Division of Mines

1962, Mines and Mineral Resources of Kern County, California, California Division of Mines and Geology, County Report 1

October 2004, Technical Note 390, "Risk Management Criteria for Metals at BLM Mining Sites", Karl L. Ford, Ph.D., Bureau of Land Management, National Science and Technology Center

September 2017 Update, BLM Technical Memorandum: Screening Assessment Approaches for Metals in Soil at BLM HazMat/AML Sites

APPENDIX A



Client Name:	USDA Forest Service-Region 5 Office	Analytical Report:	Page 1 of 1	11	
Contact:	Noelle Graham-Wakoski	Project Name:	CAM 17 M	etals - Solid	
,	10845 Rancho Bernardo Rd San Diego, CA 92127	Project Number:	Big Blue M	ill - Sequoia N	١F
Report Date:	29-Jan-2020	Work Order Number:	C0A1592		
		Received on Ice (Y/N):	Yes	Temp:	°C

Attached is the analytical report for the sample(s) received for your project. Below is a list of the individual sample descriptions with the corresponding laboratory number(s). Also, enclosed is a copy of the Chain of Custody document (if received with your sample(s)). Please note any unused portion of the sample(s) may be responsibly discarded after 30 days from the above report date, unless you have requested otherwise.

Thank you for the opportunity to serve your analytical needs. If you have any questions or concerns regarding this report please contact our client service department.

		Sample luenti	incation			
Lab Sample #	<u>Client Sample ID</u>	Matrix	Date Sampled	By	Date Submitted	By
C0A1592-01	444	Solid	01/14/20 00:00	Noelle Graham-Wako	01/15/20 14:04	Noelle Graham-Wak owski
C0A1592-02	R-15	Solid	01/14/20 00:00	Noelle Graham-Wako	01/15/20 14:04	Noelle Graham-Wak owski
C0A1592-03	441	Solid	01/14/20 00:00	Noelle Graham-Wako	01/15/20 14:04	Noelle Graham-Wak owski
C0A1592-04	439	Solid	01/14/20 00:00	Noelle Graham-Wako	01/15/20 14:04	Noelle Graham-Wak owski
C0A1592-05	431	Solid	01/14/20 00:00	Noelle Graham-Wako	01/15/20 14:04	Noelle Graham-Wak owski
C0A1592-06	435	Solid	01/14/20 00:00	Noelle Graham-Wako	01/15/20 14:04	Noelle Graham-Wak owski
C0A1592-07	442	Solid	01/14/20 00:00	Noelle Graham-Wako	01/15/20 14:04	Noelle Graham-Wak owski
C0A1592-08	434	Solid	01/14/20 00:00	Noelle Graham-Wako	01/15/20 14:04	Noelle Graham-Wak owski
C0A1592-09	445	Solid	01/14/20 00:00	Noelle Graham-Wako	01/15/20 14:04	Noelle Graham-Wak owski

Sample Identification

mailing P.O Box 432 Riverside, CA 92502-0432 *location* 6100 Quail Valley Court Riverside, CA 92507-0704 P 951 653 3351 F 951 653 1662 www.babcocklabs.com



Client Name:	USDA Forest Service-Region 5 Office	Analytical Report:	Page 2 of 11
Contact:	Noelle Graham-Wakoski	Project Name:	CAM 17 Metals - Solid
Address:	10845 Rancho Bernardo Rd		
	San Diego, CA 92127	Project Number:	Big Blue Mill - Sequoia I

Work Order Number: C0A1592

Received on Ice (Y/N): Yes Temp: °C

NF

Laboratory Reference Number

C0A1592-01

Sample Description 444		<u>Matrix</u> Solid		npled Date/Time 1/14/20 00:00	Received Date/Time 01/15/20 14:04		
Analyte(s)	Result	RDL	Units	Method	Analysis Date	Analyst	Flag
Metals and Metalloids; EPA SW846	Series						
Antimony	13	1.0	mg/kg	EPA 6020	01/21/20 18:04	MEL	
Arsenic	31000	50	mg/kg	EPA 6020	01/24/20 14:06	MEL	
Barium	36	1.0	mg/kg	EPA 6020	01/21/20 18:04	MEL	
Beryllium	ND	1.0	mg/kg	EPA 6020	01/21/20 18:04	MEL	
Cadmium	3.9	1.0	mg/kg	EPA 6020	01/21/20 18:04	MEL	
Total Chromium	2.4	1.0	mg/kg	EPA 6020	01/21/20 18:04	MEL	
Cobalt	ND	1.0	mg/kg	EPA 6020	01/21/20 18:04	MEL	
Copper	31	1.0	mg/kg	EPA 6020	01/21/20 18:04	MEL	
Lead	1600	100	mg/kg	EPA 6020	01/24/20 14:06	MEL	
Mercury	100	100	mg/kg	EPA 7471A	01/22/20 14:03	KSL	
Molybdenum	ND	5.0	mg/kg	EPA 6020	01/21/20 18:04	MEL	
Nickel	1.1	1.0	mg/kg	EPA 6020	01/21/20 18:04	MEL	
Selenium	ND	5.0	mg/kg	EPA 6020	01/21/20 18:04	MEL	
Silver	33	10	mg/kg	EPA 6020	01/21/20 18:04	MEL	
Thallium	ND	1.0	mg/kg	EPA 6020	01/21/20 18:04	MEL	
Vanadium	7.0	1.0	mg/kg	EPA 6020	01/21/20 18:04	MEL	
Zinc	100	1.0	mg/kg	EPA 6020	01/21/20 18:04	MEL	

location 6100 Quail Valley Court Riverside, CA 92507-0704 P 951 653 3351 F 951 653 1662 www.babcocklabs.com



Client Name:	USDA Forest Service-Region 5 Office	Analytical Report:	Page 3 of 11
Contact:	Noelle Graham-Wakoski	Project Name:	CAM 17 Metals - Solid
Address:	10845 Rancho Bernardo Rd		
	San Diego, CA 92127	Project Number	

Work Order Number: C0A1592

Received on Ice (Y/N): Yes Temp: °C

Laboratory Reference Number

C0A1592-02

Sample Description R-15		<u>Matrix</u> Solid		npled Date/Time 1/14/20 00:00	Received Date/Time 01/15/20 14:04		
Analyte(s)	Result	RDL	Units	Method	Analysis Date	Analyst	Flag
Metals and Metalloids; EPA SW846	Series						
Antimony	11	1.0	mg/kg	EPA 6020	01/21/20 18:06	MEL	
Arsenic	55000	50	mg/kg	EPA 6020	01/24/20 14:08	MEL	
Barium	20	1.0	mg/kg	EPA 6020	01/21/20 18:06	MEL	
Beryllium	ND	1.0	mg/kg	EPA 6020	01/21/20 18:06	MEL	
Cadmium	6.7	1.0	mg/kg	EPA 6020	01/21/20 18:06	MEL	
Total Chromium	1.8	1.0	mg/kg	EPA 6020	01/21/20 18:06	MEL	
Cobalt	ND	1.0	mg/kg	EPA 6020	01/21/20 18:06	MEL	
Copper	39	1.0	mg/kg	EPA 6020	01/21/20 18:06	MEL	
Lead	8300	100	mg/kg	EPA 6020	01/24/20 14:08	MEL	
Mercury	470	250	mg/kg	EPA 7471A	01/22/20 14:05	KSL	
Molybdenum	ND	5.0	mg/kg	EPA 6020	01/21/20 18:06	MEL	
Nickel	1.3	1.0	mg/kg	EPA 6020	01/21/20 18:06	MEL	
Selenium	5.5	5.0	mg/kg	EPA 6020	01/21/20 18:06	MEL	
Silver	82	10	mg/kg	EPA 6020	01/21/20 18:06	MEL	
Thallium	ND	1.0	mg/kg	EPA 6020	01/21/20 18:06	MEL	
Vanadium	2.3	1.0	mg/kg	EPA 6020	01/21/20 18:06	MEL	
Zinc	110	1.0	mg/kg	EPA 6020	01/21/20 18:06	MEL	

location 6100 Quail Valley Court Riverside, CA 92507-0704 P 951 653 3351 F 951 653 1662 www.babcocklabs.com



Client Name:	USDA Forest Service-Region 5 Office	Analytical Report:	Page 4 of 11
Contact:	Noelle Graham-Wakoski	Project Name:	CAM 17 Metals - Solid
	10845 Rancho Bernardo Rd San Diego, CA 92127	Project Number:	Big Blue Mill - Sequoia NF

Work Order Number: C0A1592

Received on Ice (Y/N): Yes Temp: °C

Laboratory Reference Number

C0A1592-03

Sample Description 441		<u>Matrix</u> Solid		npled Date/Time 1/14/20 00:00	Received Date/Time 01/15/20 14:04		
Analyte(s)	Result	RDL	Units	Method	Analysis Date	Analyst	Flag
Metals and Metalloids; EPA SW846 Series							
Antimony	ND	1.0	mg/kg	EPA 6020	01/21/20 18:09	MEL	
Arsenic	400	1.0	mg/kg	EPA 6020	01/21/20 18:09	MEL	
Barium	75	1.0	mg/kg	EPA 6020	01/21/20 18:09	MEL	
Beryllium	ND	1.0	mg/kg	EPA 6020	01/21/20 18:09	MEL	
Cadmium	ND	1.0	mg/kg	EPA 6020	01/21/20 18:09	MEL	
Total Chromium	7.5	1.0	mg/kg	EPA 6020	01/21/20 18:09	MEL	
Cobalt	5.3	1.0	mg/kg	EPA 6020	01/21/20 18:09	MEL	
Copper	8.9	1.0	mg/kg	EPA 6020	01/21/20 18:09	MEL	
Lead	50	2.0	mg/kg	EPA 6020	01/21/20 18:09	MEL	
Mercury	4.6	2.5	mg/kg	EPA 7471A	01/24/20 15:06	KSL	
Molybdenum	ND	5.0	mg/kg	EPA 6020	01/21/20 18:09	MEL	
Nickel	5.1	1.0	mg/kg	EPA 6020	01/21/20 18:09	MEL	
Selenium	ND	5.0	mg/kg	EPA 6020	01/21/20 18:09	MEL	
Silver	ND	10	mg/kg	EPA 6020	01/21/20 18:09	MEL	
Thallium	ND	1.0	mg/kg	EPA 6020	01/21/20 18:09	MEL	
Vanadium	28	1.0	mg/kg	EPA 6020	01/21/20 18:09	MEL	
Zinc	52	1.0	mg/kg	EPA 6020	01/21/20 18:09	MEL	

mailing P.O Box 432 Riverside, CA 92502-0432 *location* 6100 Quail Valley Court Riverside, CA 92507-0704 P 951 653 3351 F 951 653 1662 www.babcocklabs.com



Client Name:	USDA Forest Service-Region 5 Office	Analytical Report:	Page 5 of 11
Contact:	Noelle Graham-Wakoski	Project Name:	CAM 17 Metals - Solid
Address:	10845 Rancho Bernardo Rd	Project Number:	Big Blue Mill - Seguoia NF
	San Diego, CA 92127	Project Number:	

Work Order Number: C0A1592

Received on Ice (Y/N): Yes Temp: °C

Laboratory Reference Number

C0A1592-04

Sample Description 439		<u>Matrix</u> Solid		npled Date/Time 1/14/20 00:00	Received Date/Time 01/15/20 14:04		
Analyte(s)	Result	RDL	Units	Method	Analysis Date	Analyst	Flag
Metals and Metalloids; EPA SW846 Se	eries						
Antimony	2.2	1.0	mg/kg	EPA 6020	01/21/20 18:11	MEL	
Arsenic	7200	5.0	mg/kg	EPA 6020	01/24/20 14:11	MEL	
Barium	39	1.0	mg/kg	EPA 6020	01/21/20 18:11	MEL	
Beryllium	ND	1.0	mg/kg	EPA 6020	01/21/20 18:11	MEL	
Cadmium	ND	1.0	mg/kg	EPA 6020	01/21/20 18:11	MEL	
Total Chromium	3.1	1.0	mg/kg	EPA 6020	01/21/20 18:11	MEL	
Cobalt	1.6	1.0	mg/kg	EPA 6020	01/21/20 18:11	MEL	
Copper	5.1	1.0	mg/kg	EPA 6020	01/21/20 18:11	MEL	
Lead	710	2.0	mg/kg	EPA 6020	01/21/20 18:11	MEL	
Mercury	160	120	mg/kg	EPA 7471A	01/22/20 14:09	KSL	
Molybdenum	ND	5.0	mg/kg	EPA 6020	01/21/20 18:11	MEL	
Nickel	2.1	1.0	mg/kg	EPA 6020	01/21/20 18:11	MEL	
Selenium	ND	5.0	mg/kg	EPA 6020	01/21/20 18:11	MEL	
Silver	10	10	mg/kg	EPA 6020	01/21/20 18:11	MEL	
Thallium	ND	1.0	mg/kg	EPA 6020	01/21/20 18:11	MEL	
Vanadium	13	1.0	mg/kg	EPA 6020	01/21/20 18:11	MEL	
Zinc	25	1.0	mg/kg	EPA 6020	01/21/20 18:11	MEL	

location 6100 Quail Valley Court Riverside, CA 92507-0704 P 951 653 3351 F 951 653 1662 www.babcocklabs.com



Client Name:	USDA Forest Service-Region 5 Office	Analytical Report:	Page 6 of 11
Contact:	Noelle Graham-Wakoski	Project Name:	CAM 17 Metals - Solid
Address:	10845 Rancho Bernardo Rd		
	San Diego, CA 92127	Project Number:	Big Blue Mill - Sequoia NF

Work Order Number: C0A1592

Received on Ice (Y/N): Yes Temp: °C

Laboratory Reference Number

C0A1592-05

Sample Description 431		<u>Matrix</u> Solid		Sampled Date/Time 01/14/20 00:00		Received Date/Time 01/15/20 14:04		
Analyte(s)	Result	RDL	Units	Method	Analysis Date	Analyst	Flag	
Metals and Metalloids; EPA SW846	Series							
Antimony	35	1.0	mg/kg	EPA 6020	01/24/20 13:19	MEL		
Arsenic	60000	50	mg/kg	EPA 6020	01/24/20 14:13	MEL		
Barium	7.8	1.0	mg/kg	EPA 6020	01/21/20 18:14	MEL		
Beryllium	ND	1.0	mg/kg	EPA 6020	01/21/20 18:14	MEL		
Cadmium	4.1	1.0	mg/kg	EPA 6020	01/21/20 18:14	MEL		
Total Chromium	ND	1.0	mg/kg	EPA 6020	01/21/20 18:14	MEL		
Cobalt	ND	1.0	mg/kg	EPA 6020	01/21/20 18:14	MEL		
Copper	3.6	1.0	mg/kg	EPA 6020	01/21/20 18:14	MEL		
Lead	2600	100	mg/kg	EPA 6020	01/24/20 14:13	MEL		
Mercury	1500	250	mg/kg	EPA 7471A	01/22/20 14:11	KSL		
Molybdenum	ND	5.0	mg/kg	EPA 6020	01/21/20 18:14	MEL		
Nickel	ND	1.0	mg/kg	EPA 6020	01/21/20 18:14	MEL		
Selenium	ND	5.0	mg/kg	EPA 6020	01/21/20 18:14	MEL		
Silver	41	10	mg/kg	EPA 6020	01/21/20 18:14	MEL		
Thallium	ND	1.0	mg/kg	EPA 6020	01/21/20 18:14	MEL		
Vanadium	ND	1.0	mg/kg	EPA 6020	01/21/20 18:14	MEL		
Zinc	110	1.0	mg/kg	EPA 6020	01/24/20 13:19	MEL		

location 6100 Quail Valley Court Riverside, CA 92507-0704 P 951 653 3351 F 951 653 1662 www.babcocklabs.com



Client Name:	USDA Forest Service-Region 5 Office	Analytical Report:	Page 7 of 11
Contact:	Noelle Graham-Wakoski	Project Name:	CAM 17 Metals - Solid
Address:	10845 Rancho Bernardo Rd		
	San Diego, CA 92127	Project Number:	Big Blue Mill - Sequoia NF

Work Order Number: C0A1592

Received on Ice (Y/N): Yes Temp: °C

Laboratory Reference Number

C0A1592-06

Sample Description 435		<u>Matrix</u> Solid		npled Date/Time 1/14/20 00:00	Received Date/Time 01/15/20 14:04			
Analyte(s)	Result	RDL	Units	Method	Analysis Date	Analyst	Flag	
Metals and Metalloids; EPA SW846 Se	eries							
Antimony	24	1.0	mg/kg	EPA 6020	01/24/20 13:32	MEL		
Arsenic	53000	100	mg/kg	EPA 6020	01/24/20 16:31	MEL		
Barium	12	1.0	mg/kg	EPA 6020	01/24/20 13:32	MEL		
Beryllium	ND	1.0	mg/kg	EPA 6020	01/24/20 13:32	MEL		
Cadmium	3.5	1.0	mg/kg	EPA 6020	01/24/20 13:32	MEL		
Total Chromium	ND	1.0	mg/kg	EPA 6020	01/24/20 13:32	MEL		
Cobalt	ND	1.0	mg/kg	EPA 6020	01/24/20 13:32	MEL		
Copper	8.0	1.0	mg/kg	EPA 6020	01/24/20 13:32	MEL		
Lead	3200	200	mg/kg	EPA 6020	01/24/20 16:31	MEL		
Mercury	420	250	mg/kg	EPA 7471A	01/22/20 14:13	KSL		
Molybdenum	ND	5.0	mg/kg	EPA 6020	01/24/20 13:32	MEL		
Nickel	ND	1.0	mg/kg	EPA 6020	01/24/20 13:32	MEL		
Selenium	ND	5.0	mg/kg	EPA 6020	01/24/20 13:32	MEL		
Silver	53	10	mg/kg	EPA 6020	01/24/20 13:32	MEL		
Thallium	ND	1.0	mg/kg	EPA 6020	01/24/20 13:32	MEL		
Vanadium	ND	1.0	mg/kg	EPA 6020	01/24/20 13:32	MEL		
Zinc	120	1.0	mg/kg	EPA 6020	01/24/20 13:32	MEL		

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Client Name:	USDA Forest Service-Region 5 Office	Analytical Report:	Page 8 of 11
Contact:	Noelle Graham-Wakoski	Project Name:	CAM 17 Metals - Solid
Address:	10845 Rancho Bernardo Rd		
	San Diego, CA 92127	Project Number:	Big Blue Mill - Sequoia NF

Work Order Number: C0A1592

Received on Ice (Y/N): Yes Temp: °C

Laboratory Reference Number

C0A1592-07

Sample Description 442		<u>Matrix</u> Solid		npled Date/Time 1/14/20 00:00		<u>ved Date/Ti</u> 5/20 14:04	
Analyte(s)	Result	RDL	Units	Method	Analysis Date	Analyst	Flag
Metals and Metalloids; EPA SW846 S	eries						
Antimony	38	1.0	mg/kg	EPA 6020	01/24/20 13:34	MEL	
Arsenic	49000	100	mg/kg	EPA 6020	01/24/20 16:43	MEL	
Barium	32	1.0	mg/kg	EPA 6020	01/24/20 13:34	MEL	
Beryllium	ND	1.0	mg/kg	EPA 6020	01/24/20 13:34	MEL	
Cadmium	5.4	1.0	mg/kg	EPA 6020	01/24/20 13:34	MEL	
Total Chromium	2.5	1.0	mg/kg	EPA 6020	01/24/20 13:34	MEL	
Cobalt	ND	1.0	mg/kg	EPA 6020	01/24/20 13:34	MEL	
Copper	14	1.0	mg/kg	EPA 6020	01/24/20 13:34	MEL	
Lead	2400	200	mg/kg	EPA 6020	01/24/20 16:43	MEL	
Mercury	870	250	mg/kg	EPA 7471A	01/22/20 14:15	KSL	
Molybdenum	ND	5.0	mg/kg	EPA 6020	01/24/20 13:34	MEL	
Nickel	ND	1.0	mg/kg	EPA 6020	01/24/20 13:34	MEL	
Selenium	5.4	5.0	mg/kg	EPA 6020	01/24/20 13:34	MEL	
Silver	69	10	mg/kg	EPA 6020	01/24/20 13:34	MEL	
Thallium	ND	1.0	mg/kg	EPA 6020	01/24/20 13:34	MEL	
Vanadium	4.8	1.0	mg/kg	EPA 6020	01/24/20 13:34	MEL	
Zinc	170	1.0	mg/kg	EPA 6020	01/24/20 13:34	MEL	

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Client Name:	USDA Forest Service-Region 5 Office	Analytical Report:	Page 9 of 11
Contact:	Noelle Graham-Wakoski	Project Name:	CAM 17 Metals - Solid
Address:	10845 Rancho Bernardo Rd		
	San Diego, CA 92127	Project Number:	Big Blue Mill - Sequoia NF

Work Order Number: C0A1592

Received on Ice (Y/N): Yes Temp: °C

Laboratory Reference Number

C0A1592-08

Sample Description 434		<u>Matrix</u> Solid		npled Date/Time 1/14/20 00:00	Received Date/Time 01/15/20 14:04			
Analyte(s)	Result	RDL	Units	Method	Analysis Date	Analyst	Flag	
Metals and Metalloids; EPA SW846	Series							
Antimony	7.3	1.0	mg/kg	EPA 6020	01/24/20 13:36	MEL		
Arsenic	16000	100	mg/kg	EPA 6020	01/24/20 16:45	MEL		
Barium	190	1.0	mg/kg	EPA 6020	01/24/20 13:36	MEL		
Beryllium	ND	1.0	mg/kg	EPA 6020	01/24/20 13:36	MEL		
Cadmium	8.4	1.0	mg/kg	EPA 6020	01/24/20 13:36	MEL		
Total Chromium	1.8	1.0	mg/kg	EPA 6020	01/24/20 13:36	MEL		
Cobalt	ND	1.0	mg/kg	EPA 6020	01/24/20 13:36	MEL		
Copper	13	1.0	mg/kg	EPA 6020	01/24/20 13:36	MEL		
Lead	1300	200	mg/kg	EPA 6020	01/24/20 16:45	MEL		
Mercury	190	50	mg/kg	EPA 7471A	01/24/20 16:24	KSL		
Molybdenum	ND	5.0	mg/kg	EPA 6020	01/24/20 13:36	MEL		
Nickel	3.1	1.0	mg/kg	EPA 6020	01/24/20 13:36	MEL		
Selenium	ND	5.0	mg/kg	EPA 6020	01/24/20 13:36	MEL		
Silver	20	10	mg/kg	EPA 6020	01/24/20 13:36	MEL		
Thallium	ND	1.0	mg/kg	EPA 6020	01/24/20 13:36	MEL		
Vanadium	4.5	1.0	mg/kg	EPA 6020	01/24/20 13:36	MEL		
Zinc	140	1.0	mg/kg	EPA 6020	01/24/20 13:36	MEL		

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Client Name:	USDA Forest Service-Region 5 Office	Analytical Report:	Page 10 of 11
Contact:	Noelle Graham-Wakoski	Project Name:	CAM 17 Metals - Solid
Address:	10845 Rancho Bernardo Rd		
	San Diego, CA 92127	Project Number:	Big Blue Mill - Sequoia NF

Work Order Number: C0A1592

Received on Ice (Y/N): Yes Temp: °C

Laboratory Reference Number

C0A1592-09

Sample Description 445	<u>Matrix</u> Solid		npled Date/Time 1/14/20 00:00	Received Date/Time 01/15/20 14:04			
Analyte(s)	Result	RDL	Units	Method	Analysis Date	Analyst	Flag
Metals and Metalloids; EPA SW846	Series						
Antimony	8.4	1.0	mg/kg	EPA 6020	01/24/20 13:39	MEL	
Arsenic	21000	100	mg/kg	EPA 6020	01/24/20 16:48	MEL	
Barium	270	1.0	mg/kg	EPA 6020	01/24/20 13:39	MEL	
Beryllium	ND	1.0	mg/kg	EPA 6020	01/24/20 13:39	MEL	
Cadmium	12	1.0	mg/kg	EPA 6020	01/24/20 13:39	MEL	
Total Chromium	2.2	1.0	mg/kg	EPA 6020	01/24/20 13:39	MEL	
Cobalt	ND	1.0	mg/kg	EPA 6020	01/24/20 13:39	MEL	
Copper	15	1.0	mg/kg	EPA 6020	01/24/20 13:39	MEL	
Lead	1700	200	mg/kg	EPA 6020	01/24/20 16:48	MEL	
Mercury	240	50	mg/kg	EPA 7471A	01/24/20 16:26	KSL	
Molybdenum	ND	5.0	mg/kg	EPA 6020	01/24/20 13:39	MEL	
Nickel	4.1	1.0	mg/kg	EPA 6020	01/24/20 13:39	MEL	
Selenium	ND	5.0	mg/kg	EPA 6020	01/24/20 13:39	MEL	
Silver	24	10	mg/kg	EPA 6020	01/24/20 13:39	MEL	
Thallium	ND	1.0	mg/kg	EPA 6020	01/24/20 13:39	MEL	
Vanadium	5.9	1.0	mg/kg	EPA 6020	01/24/20 13:39	MEL	
Zinc	180	1.0	mg/kg	EPA 6020	01/24/20 13:39	MEL	

mailing P.O Box 432 Riverside, CA 92502-0432 *location* 6100 Quail Valley Court Riverside, CA 92507-0704 P 951 653 3351 F 951 653 1662 www.babcocklabs.com



 Client Name:
 USDA Forest Service-Region 5 Office
 Analytical Report:
 Page 11 of 11

 Contact:
 Noelle Graham-Wakoski
 Project Name:
 CAM 17 Metals - Solid

 Address:
 10845 Rancho Bernardo Rd
San Diego, CA 92127
 Project Number:
 Big Blue Mill - Sequoia NF

 Report Date:
 29-Jan-2020
 Work Order Number:
 C0A1592

Received on Ice (Y/N): Yes Temp: °C

Notes and Definitions

ND: Analyte NOT DETECTED at or above the Method Detection Limit (if MDL is reported), otherwise at or above the Reportable Detection Limit (RDL)

- NR: Not Reported
- RDL: Reportable Detection Limit
- MDL: Method Detection Limit
- * / ": NELAP does not offer accreditation for this analyte/method/matrix combination

Approval

Enclosed are the analytical results for the submitted sample(s). Babcock Laboratories certify the data presented as part of this report meet the minimum quality standards in the referenced analytical methods. Any exceptions have been noted.

Angela Brown

Angela E. Brown For KayeLani A. Marshall

cc:

e-Short_No Alias.rpt

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Client Name: USDA Forest Service-Region 5 Office Contact: Noelle Graham-Wakoski Address: 10845 Rancho Bernardo Rd				Analytical Report: Project Name:		Page 1 of 1 CAM 17 Metals - Solid				
	, CA 92127	nu				Р	Big Blue Mill - Sequoia NF			
eport Date: 29-Jan-202	20					Work C	Order Number:	C0A1592		
						Received	on Ice (Y/N):	Yes	Temp:	°C
BABCOCK Laboratories, Inc. (In Second of Evolution for two 100 here v Client: US Forest Servic	951) 653-3351 • FAX www.pabcocklabs.cor	Contact: Noelle Gra	ham	1-Wak	oski Fa	x No. 858	& Sample Inf 673-6192	Additional Reportin	g Requests	
Phone No. (858) 735-77		email: Neel(e.gro	ihai	MCUS *72 H	da, 1	10∨ *48 Hour Ri	ush *24 Hour Rush		ts: 🗌 Yes. 🖾 No	
Project Name: Big Blue N Project Location: Seguria		*Lab TAT Approval:	Journe	By:	our nush		Additional Charges Apply	- Charles Free	ts: [] Yes [] No IT: [] Yes [] No ber in Notes) []	
Sampler Informat		# of Containers & Preservatives		Sample Type	Analys	s Requested		Notes		
Name: Noelle Grah Employer: US Forest Signature: AMWA Sample ID	Service 10 Journa Date Time	Unpreserved H2SO4 H2SO4 HCI HNO3 Na255O3 Na255O3 NaOH/Zh Acetate MHaCl PDC	Total # of Containers	Routine Resample Special	CAW IT metals		DW = Dnnkmg Water WW = Waste Water GW = Ground Water S = Source SG = Sludge L = Liquid M = Misceilaneous			
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2	% Cleveland F National For 0845 Ram	cho Bernardo Rd Se	inhi	Pap 921	2-7					
3y signing on behalf of your organization ar	nd relinquishing this chain			Laborator	ies, Inc. Tel	ms and Condition	15.		d	
(For Lab Use Only) Sample	e Integrity Upon Receip	t/Acceptance Criteria				(
Sample(s) Submitted on Ice? Custody Seal(s) Intact? Sample(s) Intact? Femperature:	Yes No NA Yes No NA Yes No C □ Cooler Blant	Deviation/Notes: Ptr			o tem	s. req	COA159 Rc'd: 01/15/2020 JMG			

mailing P.O Box 432 Riverside, CA 92502-0432 location 6100 Quail Valley Court Riverside, CA 92507-0704 P 951 653 3351 F 951 653 1662 www.babcocklabs.com