

## **SWMU 7 -- Elemental Phosphorus Production Area**

### **Table of Contents**

|           |                                                    |         |
|-----------|----------------------------------------------------|---------|
| 5.5.7     | SWMU 7 - Elemental Phosphorus Production Area..... | 5.5.7-1 |
| 5.5.7.1   | RFI Investigation.....                             | 5.5.7-1 |
| 5.5.7.2   | RFI Results.....                                   | 5.5.7-2 |
| 5.5.7.2.1 | Elemental Phosphorus .....                         | 5.5.7-3 |
| 5.5.7.2.2 | Radionuclides .....                                | 5.5.7-3 |
| 5.5.7.2.3 | Metals .....                                       | 5.5.7-4 |
| 5.5.7.2.4 | SVOCs .....                                        | 5.5.7-6 |
| 5.5.7.3   | Conclusions/Data Gaps .....                        | 5.5.7-7 |
| 5.5.7.4   | References .....                                   | 5.5.7-8 |

### **List of Tables**

|               |                                                  |
|---------------|--------------------------------------------------|
| Table 5.5.7-1 | Soil Data – General and Site-Specific Parameters |
| Table 5.5.7-2 | Soil Data – Radionuclides                        |
| Table 5.5.7-3 | Soil Data – Metals                               |
| Table 5.5.7-4 | Soil Data – SVOCs                                |

### **List of Figures**

|                 |                                                 |
|-----------------|-------------------------------------------------|
| Figure 5.5.7-1a | SWMU 7 Location                                 |
| Figure 5.5.7-1b | SWMU 7 Monitoring Stations and Sample Locations |
| Figure 5.5.7-2  | SWMU 7 Phosphorus, Elemental (White)            |
| Figure 5.5.7-3  | SWMU 7 Radium 226, Thorium 232 and Uranium 238  |
| Figure 5.5.7-4  | SWMU 7 Arsenic                                  |
| Figure 5.5.7-5  | SWMU 7 Cadmium                                  |
| Figure 5.5.7-6  | SWMU 7 Chromium                                 |
| Figure 5.5.7-7  | SWMU 7 Copper                                   |
| Figure 5.5.7-8  | SWMU 7 Iron                                     |
| Figure 5.5.7-9  | SWMU 7 Lead                                     |
| Figure 5.5.7-10 | SWMU 7 Manganese                                |
| Figure 5.5.7-11 | SWMU 7 Nickel                                   |
| Figure 5.5.7-12 | SWMU 7 Selenium                                 |
| Figure 5.5.7-13 | SWMU 7 Silver                                   |

|                 |                  |
|-----------------|------------------|
| Figure 5.5.7-14 | SWMU 7 Uranium   |
| Figure 5.5.7-15 | SWMU 7 Vanadium  |
| Figure 5.5.7-16 | SWMU 7 Zinc      |
| Figure 5.5.7-17 | SWMU 7 Barium    |
| Figure 5.5.7-18 | SWMU 7 Beryllium |
| Figure 5.5.7-19 | SWMU 7 Cobalt    |
| Figure 5.5.7-20 | SWMU 7 Mercury   |
| Figure 5.5.7-21 | SWMU 7 Thallium  |
| Figure 5.5.7-22 | SWMU 7 Antimony  |
| Figure 5.5.7-23 | SWMU 7 Calcium   |
| Figure 5.5.7-24 | SWMU 7 Magnesium |
| Figure 5.5.7-25 | SWMU 7 Potassium |
| Figure 5.5.7-26 | SWMU 7 Sodium    |

### **List of Appendices**

|                  |             |
|------------------|-------------|
| Appendix 5.5.7-A | Boring Logs |
|------------------|-------------|

### **5.5.7 SWMU 7 - Elemental Phosphorus Production Area**

The location of Solid Waste Management Unit (SWMU) 7 is shown on Figure 5.5.7-1a and SWMU 7 monitoring stations and sample locations are provided on Figure 5.5.7-1b. SWMU 7, the Elemental Phosphorus Production Area, is where elemental phosphorus was produced and/or handled during operations at the Silver Bow Plant and includes the furnace area, slag pits and granulation area, phosphorus processing tanks, concrete silos, P4 Handling area, powerhouse area, roaster area, and phosphoric acid plant. The production area also includes the following SWMUs and Areas of Concern (AOC):

- Clarifier (SWMU 2),
- Crude Phosphorus Burial Area (SWMU 11),
- Sulfuric Acid Tank Area (AOC B)

Information for each of these specific SWMUs also appears in Section 5.5.2 (SWMU 2), 5.5.11 (SWMU 11), and 5.5.29 (AOC B), and will not be repeated here.

The production facility was decontaminated during the demolition activities. Buildings were demolished and sold as scrap metal. Tanks, piping and equipment containing elemental phosphorus were cleaned and recycled, except a few items that were stockpiled. The phosphorus storage tanks were above ground stainless steel tanks that have been cleaned and recycled. The phosphorus process tanks generally had bases recessed four feet into the ground, with the majority of the stainless steel tank above ground. These tanks have also been cleaned and recycled. Foundations have been covered by 3 feet of soil/slag. Concrete silos and the kiln scrubbers remain.

#### **5.5.7.1 RFI Investigation**

Elemental phosphorus was produced and handled in SWMU 7. SWMU 7 was investigated in accordance with the RCRA Facility Investigation Work Plan (RFI) work plan (Barr, 2009). Consistent with investigation activities at other elemental phosphorus production facilities, the purpose of the investigation at the production area was to identify an outer perimeter of the area that is contaminated with elemental phosphorus. Such a horizontal delineation would be necessary in the event capping is required of the elemental phosphorus contaminated area. The Elemental Phosphorus Production Area (SWMU 7) was covered by three to four feet of coarse slag during the Plant demolition activities in the late 1990s.

One soil boring was installed approximately every 200 feet around the perimeter of the production area to a depth of 10 feet into native soil to delineate the horizontal extent of the elemental phosphorus production area (see Figure 5.5.7-1b). Fourteen borings were installed using 5.25-inch diameter hollow stem auger drilling equipment. Soil samples were collected at approximately 2½-foot intervals using split-spoon samplers as described in the Field Sampling Plan of the RFI Work Plan (Barr, 2009). None of the soil cuttings or soil samples smoked and/or ignited, therefore, the investigation area was not expanded. Upon completion of each boring, the boring was backfilled with bentonite chips which were then hydrated. The boring logs are provided in Appendix 5.5.7-A.

One sample was collected from each split spoon for XRF (x-ray fluorescent) analysis and potential laboratory analysis. These samples were analyzed in the field laboratory according to the XRF screening and confirmatory protocols. The sample with the overall highest metals concentrations at each borehole was selected for confirmatory analysis for the metals.

As detailed in the RFI Work Plan, a separate aliquot from each split spoon was placed in a stainless steel bowl and covered with aluminum foil between split spoon samples. Immediately upon collection of the last aliquot, the soils were mixed and a sample was collected for analysis of elemental phosphorus. Although this compositing scheme could allow some elemental phosphorus to oxidize, the overall process would represent the average concentration to which a hypothetical construction worker could be exposed. Construction activity would bring soils to the surface allowing oxidation of elemental phosphorus in the spoil pile and at the trench side walls and floor. Therefore, the compositing program is appropriate to evaluate the exposure concentration for the construction worker scenario.

#### **5.5.7.2 RFI Results**

This section discusses the results of the investigation at the Elemental Phosphorus Production Area. The SWMU sample data and background values (i.e., mean, maximum, and 95% upper confidence limit of the mean) are summarized in Tables 5.5.7-1 through 5.5.7-4. The locations of the samples are shown on Figure 5.5.7-1b. Figures 5.5.7-2 through 5.5.7-26, show the locations, concentrations and depth intervals for the data reported on the tables.

Soil data from SWMU 7 were compared to the background/reference area concentrations. Concentrations above the 95% upper confidence limit of the mean background/reference area concentrations are highlighted on the constituent delineation figures presented in this section. Where

a 95% upper limit could not be calculated, the maximum detected concentration or the maximum detection limit was selected.

Constituent concentrations are described in this report as above background/reference area concentrations if the mean and maximum concentrations of the SWMU data exceed both of the mean and maximum background/reference area values. All data will be retained for evaluation in the human health and ecological risk assessments. The definitive background comparison will be conducted in the risk assessment using a statistical approach consistent with EPA guidance (U.S. EPA 2002).

#### **5.5.7.2.1 Elemental Phosphorus**

Fourteen soil borings (EPP-1 through EPP-14) were installed around the perimeter of the elemental phosphorus production area. None of the soil cuttings or soil samples from this investigation smoked and/or ignited indicating that elemental phosphorus is not present at hazardous waste characteristic concentrations. Fourteen composite soil samples were analyzed for elemental phosphorus. The analytical data is summarized in Table 5.5.7-1 and plotted on Figure 5.5.7-2. Elemental phosphorus was not detected in any of the fourteen soil samples from the perimeter of SWMU 7. The horizontal extent of elemental phosphorus was established by the investigation program. Soil within this area is known to contain elemental phosphorus. As such, corrective measures to manage future construction through this former production area are warranted.

#### **5.5.7.2.2 Radionuclides**

The elemental phosphorus production area is covered by 3 to 4 feet of slag. As such, the area represents the same radionuclide profile as the slag piles (i.e., SWMU 12 and SWMU 13). Slag contains naturally occurring radioactive materials (NORM). The radioactivity is almost exclusively due to trace levels of uranium and its decay products (Lloyd, 1983). Typical radionuclide concentrations for the long lasting radionuclides in slag are as follows:

| <b>Radionuclide</b> | <b>Typical Concentration</b> |
|---------------------|------------------------------|
| Pb-210              | 1 pCi/g                      |
| Ra-226              | 28 pCi/g                     |
| Th-230              | 47 pCi/g                     |
| U234                | 24 pCi/g                     |
| U238                | 24 pCi/g                     |

Radionuclides were evaluated at one location (FS3) within the perimeter of SWMU 7 (see Figure 5.5.7-3). Sample FS3 was collected from a slag covered area near the crude phosphorus burial area and southeast of the clarifier. The radionuclide data are presented in Table 5.5.7-2 and are consistent with slag as the source of the radionuclides (i.e., elevated Uranium-238 and Radium-226).

#### **5.5.7.2.3 Metals**

The analytical laboratory and correlated XRF data were combined to assist the delineation of the hazardous constituents. Hazardous constituent concentrations based on the XRF data were estimated using the linear equations presented in Section 5.4.2 for the respective hazardous constituents. The correlation coefficient ( $R^2$ ) is greater than 0.7 for these hazardous constituents. The metals data are presented in Table 5.5.7-3. The 2009 XRF evaluation provided data for arsenic, cadmium, chromium, lead, manganese, selenium, silver, uranium, vanadium, and zinc.

##### **5.5.7.2.3.1 Group A**

The metals included in Group A are arsenic, cadmium, chromium, and copper. The distribution of these metal constituents is shown on Figures 5.5.7-4 through 5.5.7-7, respectively, and the data are presented on Table 5.5.7-3.

Arsenic and copper concentrations are consistent with background concentrations. Cadmium and chromium are present at concentrations above the background concentrations. However, these constituents were not detected in the majority of the samples. Samples collected at the top of native soils at EPP-10 and EPP-11 had the highest concentrations of cadmium. Cadmium was not detected in the deepest interval sampled below these higher concentrations. Similarly, chromium was reported at higher concentrations in the top of native soils at EPP-9 and EPP-10 and chromium was not detected in the interval below the higher concentrations. The sample from the 4.5- to 6.5-foot interval at EPP-1 reported higher concentrations of cadmium and chromium. Cadmium was not detected in the samples above and below this higher interval.

##### **5.5.7.2.3.2 Group B**

The metals included in Group B are iron, lead, manganese, and nickel. The distribution of these metal constituents is shown on Figures 5.5.7-8 through 5.5.7-11, respectively, and the data are presented on Table 5.5.7-3. The iron, lead, and manganese concentrations are consistent with background concentrations. Nickel is present at concentrations above background. Only one sample (EEP-9 0-2 feet) exceeds the maximum nickel concentration reported in the background data set, and the exceedence is less than a factor of two.

#### **5.5.7.2.3.3 Group C**

The metals included in Group C are selenium, silver, uranium vanadium, and zinc. The distribution of these metal constituents is shown on Figures 5.5.7-12 through 5.5.7-16, respectively, and the data are presented on Table 5.5.7-3. Vanadium concentrations are consistent with background concentrations. The mean concentration across the SWMU data is less than the mean concentration of the background dataset.

Selenium was detected in samples for EPP-1, EPP-9, EPP-11 and EPP-12. The higher concentrations were reported in the top of native soils at EPP-9, EPP-11 and EPP-12. Selenium is not widely distributed across the SWMU as it was detected in only 7 of 60 samples.

Silver is not widely distributed across the SWMU as it was only detected in 6 of 60 samples, but concentrations are above background in samples from EPP-4, EPP-8 and EPP-11.

Uranium was detected in 17 of 60 soil samples at concentrations ranging from 0.02 mg/kg to 20.1 mg/kg. The highest concentration was found in the 5- to 7-foot interval at EPP-11. Uranium was not detected in the interval below this sample.

Zinc is naturally present in native soils across the United States. Zinc was detected in 60 of 60 soil samples at concentrations ranging from 22 mg/kg to 586 mg/kg. Both the maximum and average zinc concentrations are higher than the maximum and average background concentrations, therefore zinc is considered to be above background. Zinc concentrations were above the maximum background concentration at only EPP-1 so the elevated zinc concentrations are not widely distributed around the SWMU.

#### **5.5.7.2.3.4 Group D**

The metals included in Group D are barium, beryllium, cobalt, mercury, and thallium. The distribution of these metal constituents are shown on Figures 5.5.7-17 through 5.5.7-21, respectively, and the data are presented on Table 5.5.7-3.

Barium is naturally present in native soils across the United States. Barium was detected in 15 of 15 soil samples at concentrations ranging from 116 mg/kg to 299 mg/kg. The maximum concentration is only 9 mg/kg higher than the maximum background concentration and was found at EPP-2 between 7-9 feet. There is no discernible spatial distribution of barium concentrations.

Beryllium concentrations are consistent with background concentrations.

Cobalt concentrations are somewhat higher than background as both the mean and maximum concentrations are above the mean and maximum background concentrations. The maximum concentration only exceeds the background maximum by 0.4 mg/kg.

The highest concentration of mercury was found at EPP-10 between 7-8 feet bgs. This sample was obtained from the original ground surface. The boring log indicates there is 7 feet of fill overlying the native soil at this location.

Thallium was detected in 15 of the 15 soil samples ranging in concentrations from 0.18 mg/kg to 4.69 mg/kg. Both the maximum and average thallium concentration are higher than the maximum and average background concentrations, therefore thallium is considered to be above background. The highest concentration was recorded at EPP-1 between 4.5-6.5 feet. Samples from EPP-10 and EPP-11 also contained thallium concentrations above the maximum background concentration.

#### **5.5.7.2.3.5 Metals - Group E**

The metals included in Group E are antimony, calcium, magnesium, potassium, and sodium. The distribution of these metal constituents are shown on Figures 5.5.7-22 through 5.5.7-26, respectively, and the data are presented on Table 5.5.7-3. Antimony concentrations are consistent with background concentrations.

Calcium, magnesium, potassium, and sodium were found at concentrations above the background concentrations. These parameters are not hazardous constituents.

#### **5.5.7.2.3.6 Metals Delineation**

The following metals were identified as above background based on comparison to the background/reference area values: barium, cadmium, calcium, chromium, cobalt, magnesium, mercury, nickel, potassium, selenium, silver, sodium, thallium, uranium, and zinc. Boring EPP-1, EPP-10 and EPP-11 reported the higher metals concentrations than samples from the other borings. The metals concentrations will be evaluated in the risk assessment. The risk assessment will identify which metals, if any, are present at concentrations that warrant corrective measures. The dataset would be reviewed at that time and additional sampling may be necessary to inform the corrective measures study or later during the corrective measures design phase.

#### **5.5.7.2.4 SVOCs**

Boring EPP-14 was installed through a former railroad track area. The boring log for EPP-14 identifies a railroad tie covered by asphalt in the surface interval (*see* Appendix 5.5.7-A). Railroad ties are typically treated with creosote as a wood preservative. The driller augured through the

railroad tie to advance the boring to deeper intervals. The soils in the surface interval contained a faint naphthalene-like odor. The soil sample from the 7-9 foot interval at EPP-14 had a moderate naphthalene-like odor. The soil sample below the 7-9 foot interval did not have a naphthalene-like odor. A sample from the 7-9 foot interval was analyzed for semi volatile organic compounds (SVOCs) to evaluate the naphthalene-like odor.

The SVOC data are summarized in Table 5.5.7-4. The SVOCs detected in the SWMU 7 samples belong to a subgroup of SVOCs known as polynuclear aromatic hydrocarbons (PAHs). These multi-benzene-ringed compounds are present in creosote. The creosoted treated railroad ties are the likely source of the PAHs detected in the soil sample. The PAH concentrations are typical of concentrations associated with railroad tracks and creosote treated ties.

### **5.5.7.3 Conclusions/Data Gaps**

This SWMU encompasses the entire elemental phosphorus production area. Fourteen soil borings were installed around the perimeter of the elemental phosphorus production area. None of the soil cuttings or soil samples from this investigation smoked and/or ignited indicating that elemental phosphorus is not present at hazardous waste characteristic concentrations. In addition, elemental phosphorus was not detected in any of the 14 soil samples from the perimeter of SWMU 7. The horizontal extent of elemental phosphorus was established by the investigation program.

Soil and groundwater inside the defined area are known to contain elemental phosphorus. SWMU 7 includes the clarifier and the crude phosphorus burial area. The clarifier contains approximately 500,000 gallons of crude phosphorus, which contains about 20% elemental phosphorus, and crude phosphorus was buried at the crude phosphorus burial area (SWMU 11). Elemental phosphorus was also detected in groundwater samples collected from wells at the clarifier (see Section 5.5.2). Elemental phosphorus was not found in groundwater samples outside the perimeter of SWMU 7. The horizontal extent of elemental phosphorus was established by the investigation program.

Several metals were found at concentrations above the background concentrations in samples collected from the perimeter borings including barium, cadmium, calcium, chromium, cobalt, magnesium, mercury, nickel, potassium, selenium, silver, sodium, thallium, uranium, and zinc. Higher metals concentrations were typically associated with Borings EPP-1, EPP-10 and EPP-11. However, there is no discernible distribution to the higher metals concentrations.

Boring EPP-14 was advanced through a railroad track area that had creosote treated ties. Soils from this boring had a naphthalene-like odor and the interval with the strongest odor was analyzed for

SVOCs. This sample contained creosote-related PAH compounds as would be associated with railroad track areas.

The elemental phosphorus production area is covered by several feet of slag. Therefore, radionuclides associated with slag are present at concentrations represented by slag. A surface sample collected from within the production area confirmed that elevated concentrations of radium-226 and uranium-238 are present in the production area.

The horizontal extent of elemental phosphorus was established by the investigation program and soils within the perimeter of SWMU 7 contain elemental phosphorus. Corrective measures to manage future construction through this former production area are warranted.

There is sufficient information to conduct the risk assessment for this SWMU. The risk assessment will identify which parameters, if any, are present at concentrations that warrant corrective measures. The dataset would be reviewed at that time and additional sampling may be necessary to inform the corrective measures study or later during the corrective measures design phase.

#### **5.5.7.4 References**

- Barr Engineering Co. 2009. Final Phase I RCRA Facility Investigation Work Plan Corrective Action Order on Consent, Docket No. RCRA-08-2004-0001., Rhodia Silver Bow Plant, Butte, Montana, March 2009.
- Lloyd, L.L. June 1983. Evaluation of Radon Sources and Phosphate Slag in Butte, Montana. Occupational Health Bureau, Montana Department of Health and Environmental Sciences.
- U.S. EPA. 2002. Guidance for Comparing Background and Chemical Concentrations in Soil for CERCLA Sites. U.S. Environmental Protection Agency. EPA 540-R-01-003. OSWER 9285.7-41. September 2002

## Tables

**Table 5.5.7-1**  
**Soil Data - General and Site-Specific Parameters**  
**SWMU 7**  
**Rhodia Silver Bow Plant**  
[concentrations in mg/kg]

| Chemical Name  |                |             |                | Phosphorus,<br>elemental (white) |
|----------------|----------------|-------------|----------------|----------------------------------|
| Location<br>ID | Sample<br>Date | Depth       | Sample<br>Type |                                  |
| EPP-1          | 5/19/2009      | 0 - 11.5 ft | N              | < 0.00047                        |
|                |                |             | FD             | < 0.00047                        |
| EPP-2          | 5/18/2009      | 0 - 11.5 ft | N              | < 0.00047                        |
| EPP-3          | 5/18/2009      | 0 - 12.5 ft | N              | < 0.00047                        |
| EPP-4          | 5/18/2009      | 0 - 22.5 ft | N              | < 0.00047                        |
| EPP-5          | 5/16/2009      | 0 - 16 ft   | N              | < 0.00047                        |
| EPP-6          | 5/16/2009      | 0 - 13 ft   | N              | < 0.00047                        |
| EPP-7          | 5/16/2009      | 0 - 12 ft   | N              | < 0.00047                        |
| EPP-8          | 5/16/2009      | 0 - 11 ft   | N              | < 0.00047                        |
| EPP-9          | 5/17/2009      | 0 - 10 ft   | N              | < 0.00047                        |
| EPP-10         | 5/17/2009      | 0 - 12 ft   | N              | < 0.00047                        |
| EPP-11         | 5/17/2009      | 0 - 12 ft   | N              | < 0.00047                        |
| EPP-12         | 5/17/2009      | 0 - 9.5 ft  | N              | < 0.00047                        |
| EPP-13         | 5/18/2009      | 0 - 10.5 ft | N              | < 0.00047                        |
| EPP-14         | 5/18/2009      | 0 - 11.5 ft | N              | < 0.00047                        |

**Table 5.5.7-2**  
**Soil Data - Radionuclides**  
**SWMU 7**  
**Rhodia Silver Bow Plant**  
[concentrations in pCi/g]

| Chemical Name                                    |             |             | Radium 226                | Thorium 232  | Uranium 238                |
|--------------------------------------------------|-------------|-------------|---------------------------|--------------|----------------------------|
| Background Mean, Exceedances <b>Bold</b>         |             |             | <b>3.6</b>                |              | <b>0.78</b>                |
| Background Maximum, Exceedances <u>Underline</u> |             |             | <u>12</u>                 |              | <u>2.7</u>                 |
| Background 95% UCL, Exceedances <i>Italic</i>    |             |             | <i>5.0</i>                |              | <i>1.6</i>                 |
| Location ID                                      | Sample Date | Sample Type |                           |              |                            |
| FS3                                              | 1/1/1999    | N           | <u><b>17 +/- 0.81</b></u> | 1.3 +/- 0.86 | <u><b>62 +/- 46.00</b></u> |

Table 5.5.7-3  
Soil Data - Metals  
SWMU 7  
Rhodia Silver Bow Plant  
[concentrations in mg/kg]

| Chemical Name<br>Analysis Location               |                |                |                | Antimony<br>Lab | Arsenic<br>Lab | Arsenic<br>Field | Barium<br>Lab | Beryllium<br>Lab | Cadmium<br>Lab | Cadmium<br>Field | Calcium<br>Lab | Chromium<br>Lab | Chromium<br>Field | Cobalt<br>Lab | Copper<br>Lab | Iron<br>Lab | Lead<br>Lab | Lead<br>Field | Magnesium<br>Lab | Manganese<br>Lab | Manganese<br>Field | Mercury<br>Lab |
|--------------------------------------------------|----------------|----------------|----------------|-----------------|----------------|------------------|---------------|------------------|----------------|------------------|----------------|-----------------|-------------------|---------------|---------------|-------------|-------------|---------------|------------------|------------------|--------------------|----------------|
| Background Mean, Exceedances <b>Bold</b>         |                |                |                | 0.50            | 23             | 23               | 150           | 0.51             | 1.6            | 1.6              | 3900           | 11              | 11                | 5.9           | 35            | 19600       | 17          | 17            | 3500             | 540              | 540                | 0.021          |
| Background Maximum, Exceedances <u>Underline</u> |                |                |                | 3.9             | 120            | 120              | <u>290</u>    | 1.3              | <u>8.9</u>     | <u>8.9</u>       | <u>14000</u>   | <u>48</u>       | <u>48</u>         | <u>9.5</u>    | 300           | 35300       | 190         | 190           | <u>5700</u>      | 1100             | 1100               | <u>0.20</u>    |
| Background 95% UCL, Exceedances <i>Italic</i>    |                |                |                | 1.0             | 40             | 40               | 165.1         | 0.546            | 1.057          | 1.057            | 4500           | 12.46           | 12.46             | 6.145         | 63.87         | 20600       | 34.98       | 34.98         | 3700             | 570              | 570                | 0.0381         |
| Location<br>ID                                   | Sample<br>Date | Depth          | Sample<br>Type |                 |                |                  |               |                  |                |                  |                |                 |                   |               |               |             |             |               |                  |                  |                    |                |
| EPP-1                                            | 5/19/2009      | 2 - 4 ft       | N              | --              | --             | 10 J             | --            | --               | --             | < 0.2            | --             | --              | < 2               | --            | --            | --          | --          | 22 J          | --               | --               | 285                | --             |
|                                                  |                |                | FD             | --              | --             | 16 J             | --            | --               | --             | < 0.2            | --             | --              | < 2               | --            | --            | --          | --          | 13 J          | --               | --               | 345                | --             |
| EPP-1                                            | 5/19/2009      | 4.5 - 6.5 ft   | N              | 1.57            | 4.1            | < 18             | 116           | 0.48 J           | 36.6           | 30               | 32700          | 22.8            | < 2               | 3.8           | 15.2          | 20200       | 72          | 87            | 3910             | 201              | 293                | 0.015 J        |
|                                                  |                |                | FD             | 1.41            | 4.5            | 18 J             | 131           | 0.50 J           | 31.3           | 27               | 37600          | 27.8            | < 2               | 4.3           | 14.6          | 19900       | 65.3        | 103           | 3700             | 235              | 248                | 0.013 J        |
| EPP-1                                            | 5/19/2009      | 7 - 9 ft       | N              | --              | --             | 26 J             | --            | --               | --             | < 0.2            | --             | --              | 3 J               | --            | --            | --          | --          | 65            | --               | --               | 315                | --             |
|                                                  |                |                | FD             | --              | --             | 16 J             | --            | --               | --             | < 0.2            | --             | --              | < 2               | --            | --            | --          | --          | 72            | --               | --               | 308                | --             |
| EPP-1                                            | 5/19/2009      | 9.5 - 11.5 ft  | N              | --              | --             | 14 J             | --            | --               | --             | < 0.2            | --             | --              | < 2               | --            | --            | --          | --          | 46            | --               | --               | 195 J              | --             |
|                                                  |                |                | FD             | --              | --             | 14 J             | --            | --               | --             | < 0.2            | --             | --              | < 2               | --            | --            | --          | --          | 43            | --               | --               | 143 J              | --             |
| EPP-2                                            | 5/18/2009      | 2 - 4 ft       | N              | --              | --             | < 11             | --            | --               | --             | < 0.2            | --             | --              | < 2               | --            | --            | --          | --          | 7 J           | --               | --               | 398                | --             |
| EPP-2                                            | 5/18/2009      | 4.5 - 6.5 ft   | N              | --              | --             | 11 J             | --            | --               | --             | < 0.2            | --             | --              | < 2               | --            | --            | --          | --          | 12 J          | --               | --               | 458                | --             |
| EPP-2                                            | 5/18/2009      | 7 - 9 ft       | N              | 0.37            | 5.5            | 13 J             | 299           | 0.64 J           | < 0.2          | < 0.2            | 8640           | 8.7             | < 2               | 9.2 J         | 29            | 21600       | 13.3 J      | 15 J          | 4990 J           | 1070             | 810                | 0.024          |
| EPP-2                                            | 5/18/2009      | 9.5 - 11.5 ft  | N              | --              | --             | 11 J             | --            | --               | --             | < 0.2            | --             | --              | < 2               | --            | --            | --          | --          | 8 J           | --               | --               | 420                | --             |
| EPP-3                                            | 5/18/2009      | 3 - 4 ft       | N              | 0.68            | 15.6           | 18 J             | 138           | 0.46 J           | 1.2            | < 0.2            | 21200          | 11.1            | < 2               | 4.1           | 27            | 14400       | 10.3 J      | 8 J           | 4710             | 290              | 323                | 0.034          |
| EPP-3                                            | 5/18/2009      | 5 - 7 ft       | N              | --              | --             | 9 J              | --            | --               | --             | < 0.2            | --             | --              | < 2               | --            | --            | --          | --          | 8 J           | --               | --               | 285                | --             |
| EPP-3                                            | 5/18/2009      | 8 - 10 ft      | N              | --              | --             | < 12             | --            | --               | --             | < 0.2            | --             | --              | < 2               | --            | --            | --          | --          | 15 J          | --               | --               | 360                | --             |
| EPP-3                                            | 5/18/2009      | 10.5 - 12.5 ft | N              | --              | --             | 12 J             | --            | --               | --             | < 0.2            | --             | --              | < 2               | --            | --            | --          | --          | 9 J           | --               | --               | 368                | --             |
| EPP-4                                            | 5/18/2009      | 13 - 15 ft     | N              | --              | --             | 13 J             | --            | --               | --             | < 0.2            | --             | --              | < 2               | --            | --            | --          | --          | 15 J          | --               | --               | 465                | --             |
| EPP-4                                            | 5/18/2009      | 15.5 - 17.5 ft | N              | 0.51            | 6.4            | 17 J             | 247           | 0.72 J           | < 0.2          | < 0.2            | 5930           | 7.8             | < 2               | 8.8           | 34.6          | 25700       | 23.3        | 22 J          | 6080             | 531              | 518                | 0.018 J        |
| EPP-4                                            | 5/18/2009      | 18 - 20 ft     | N              | --              | --             | < 0.2            | --            | --               | --             | < 2              | --             | --              | 12 J              | --            | --            | --          | --          | < 1           | --               | --               | 735                | --             |
| EPP-4                                            | 5/18/2009      | 20.5 - 22.5 ft | N              | --              | --             | 15 J             | --            | --               | --             | < 0.2            | --             | --              | < 2               | --            | --            | --          | --          | 13 J          | --               | --               | 525                | --             |
| EPP-5                                            | 5/16/2009      | 5 - 6 ft       | N              | --              | --             | 12 J             | --            | --               | --             | < 0.2            | --             | --              | < 2               | --            | --            | --          | --          | 13 J          | --               | --               | 495                | --             |
| EPP-5                                            | 5/16/2009      | 7 - 9 ft       | N              | 0.38            | 5.5            | 14 J             | 178           | 0.67 J           | < 0.2          | < 0.2            | 3770           | 6.8             | < 2               | 9.9           | 28.5          | 23600       | 9.8 J       | 12 J          | 6400             | 522              | 480                | 0.026          |
| EPP-5                                            | 5/16/2009      | 10 - 11 ft     | N              | --              | --             | 12 J             | --            | --               | --             | < 0.2            | --             | --              | < 2               | --            | --            | --          | --          | 12 J          | --               | --               | 450                | --             |
| EPP-5                                            | 5/16/2009      | 12 - 14 ft     | N              | --              | --             | 11 J             | --            | --               | --             | < 0.2            | --             | --              | < 2               | --            | --            | --          | --          | 9 J           | --               | --               | 503                | --             |
| EPP-6                                            | 5/16/2009      | 3 - 5.5 ft     | N              | --              | --             | 13 J             | --            | --               | --             | < 0.2            | --             | --              | < 2               | --            | --            | --          | --          | 8 J           | --               | --               | 473                | --             |
| EPP-6                                            | 5/16/2009      | 5.5 - 8 ft     | N              | 0.29            | 5.6            | 14 J             | 192           | 0.58 J           | < 0.2          | < 0.2            | 5210           | 6.7             | < 2               | 6.9           | 22.2          | 17600       | 7.3 J       | 12 J          | 4610             | 475              | 473                | 0.015 J        |
| EPP-6                                            | 5/16/2009      | 8.5 - 10.5 ft  | N              | --              | --             | 12 J             | --            | --               | --             | < 0.2            | --             | --              | < 2               | --            | --            | --          | --          | 11 J          | --               | --               | 488                | --             |
| EPP-6                                            | 5/16/2009      | 11 - 13 ft     | N              | --              | --             | 10 J             | --            | --               | --             | < 0.2            | --             | --              | < 2               | --            | --            | --          | --          | 18 J          | --               | --               | 555                | --             |
| EPP-7                                            | 5/16/2009      | 2 - 4 ft       | N              | --              | --             | 12 J             | --            | --               | --             | < 0.2            | --             | --              | < 2               | --            | --            | --          | --          | 8 J           | --               | --               | 885                | --             |
| EPP-7                                            | 5/16/2009      | 5 - 7 ft       | N              | --              | --             | 11 J             | --            | --               | --             | < 0.2            | --             | --              | < 2               | --            | --            | --          | --          | 8 J           | --               | --               | 960                | --             |
| EPP-7                                            | 5/16/2009      | 7.5 - 9.5 ft   | N              | --              | --             | 10 J             | --            | --               | --             | < 0.2            | --             | --              | < 2               | --            | --            | --          | --          | 6 J           | --               | --               | 728                | --             |
| EPP-7                                            | 5/16/2009      | 10 - 12 ft     | N              | 0.45            | 3.6            | 13 J             | 270           | 0.34 J           | < 0.2          | < 0.2            | 3230           | 7.2             | < 2               | 5.3           | 13.9          | 18300       | < 3.3       | 10 J          | 2410             | 708              | 960                | 0.014 J        |
| EPP-8                                            | 5/16/2009      | 1 - 3.5 ft     | N              | 0.42            | 19.1           | 23 J             | 163           | 0.52 J           | 0.5 J          | < 0.2            | 22100          | 11.6            | < 2               | 5.1           | 22.1          | 17300       | 9.8 J       | 5 J           | 4000             | 311              | 308                | 0.029          |
| EPP-8                                            | 5/16/2009      | 5 - 6 ft       | N              | --              | --             | 10 J             | --            | --               | --             | < 0.2            | --             | --              | < 2               | --            | --            | --          | --          | 8 J           | --               | --               | 405                | --             |
| EPP-8                                            | 5/16/2009      | 6.5 - 8.5 ft   | N              | --              | --             | 10 J             | --            | --               | --             | < 0.2            | --             | --              | < 2               | --            | --            | --          | --          | 9 J           | --               | --               | 368                | --             |
| EPP-8                                            | 5/16/2009      | 9 - 11 ft      | N              | --              | --             | 12 J             | --            | --               | --             | < 0.2            | --             | --              | < 2               | --            | --            | --          | --          | 7 J           | --               | --               | 450                | --             |
| EPP-9                                            | 5/17/2009      | 0 - 2 ft       | N              | 0.74            | 12.8           | 12 J             | 169           | 0.67 J           | 1.2            | < 0.2            | 19900          | 145             | 237               | 5.4           | 43.3          | 20300       | 9.5 J       | 13 J          | 4000             | 356              | 435                | 0.018 J        |
| EPP-9                                            | 5/17/2009      | 3 - 5 ft       | N              | --              | --             | 13 J             | --            | --               | --             | < 0.2            | --             | --              | < 2               | --            | --            | --          | --          | 10 J          | --               | --               | 435                | --             |
| EPP-9                                            | 5/17/2009      | 5.5 - 7.5 ft   | N              | --              | --             | 14 J             | --            | --               | --             | < 0.2            | --             | --              | < 2               | --            | --            | --          | --          | 9 J           | --               | --               | 503                | --             |
| EPP-9                                            | 5/17/2009      | 8 - 10 ft      | N              | --              | --             | 10 J             | --            | --               | --             | < 0.2            | --             | --              | < 2               | --            | --            | --          | --          | 17 J          | --               | --               | 405                | --             |
| EPP-10                                           | 5/17/2009      | 7 - 8 ft       | N              | 1.21            | 15.9           | 22 J             | 162           | 0.61 J           | 14.6           | 6 J              | 4250           | 7.2             | < 2               | 5.4           | 29.8          | 15500       | 11.5 J      | 8 J           | 3150             | 372              | 390                | 0.645          |
| EPP-10                                           | 5/17/2009      | 9 - 11 ft      | N              | --              | --             | 14 J             | --            | --               | --             | < 0.2            | --             | --              | < 2               | --            | --            | --          | --          | 11 J          | --               | --               | 435                | --             |
| EPP-10                                           | 5/17/2009      | 12 - 14 ft     | N              | --              | --             | 18 J             | --            | --               | --             | < 0.2            | --             | --              | < 2               | --            | --            | --          | --          | 8 J           | --               | --               | 383                | --             |
| EPP-10                                           | 5/17/2009      | 15 - 17 ft     | N              | --              | --             | 12 J             | --            | --               | --             | < 0.2            | --             | --              | < 2               | --            | --            | --          | --          | 13 J          | --               | --               | 255                | --             |
| EPP-11                                           | 5/17/2009      | 2.5 - 4.5 ft   | N              | --              | --             | 24 J             | --            | --               | --             | 32               | --             | --              | < 2               | --            | --            | --          | --          | 17 J          | --               | --               | 315                | --             |
| EPP-11                                           | 5/17/2009      | 5 - 7 ft       | N              | 2.13            | 21.6           | 29 J             | 236           | 0.82 J           | 42.5           | 30               | 71700          | 66.4            | 89                | 4.2           | 43            | 16900       | 31.3        | 32            | 4680             | 283              | 383                | 0.217          |
| EPP-11                                           | 5/17/2009      | 7.5 - 9.5 ft   | N              | --              | --             | 12 J             | --            | --               | --             | < 0.2            | --             | --              | < 2               | --            | --            | --          | --          | 8 J           | --               | --               | 383                | --             |
| EPP-11                                           | 5/17/2009      | 10 - 12 ft     | N              | --              | --             | 12 J             | --            | --               | --             | < 0.2            | --             | --              | < 2               | --            | --            | --          | --          | 14 J          | --               | --               | 368                | --             |
| EPP-12                                           | 5/17/2009      | 0 - 2 ft       | N              | 0.77            | 8              | 18 J             | 171           | 0.65 J           | 5.2            | < 0.2            | 13300          | 10.7            | < 2               | 6.1           | 24.1          | 18300       | 9.4 J       | 10 J          | 4040             | 473              | 488                | 0.032          |
| EPP-12                                           | 5/17/2009      | 2.5 - 4.5 ft   | N              | --              | --             | 14 J             | --            | --               | --             | < 0.2            | --             | --              | < 2               | --            | --            | --          | --          | 7 J           | --               | --               | 450                | --             |
| EPP-12                                           | 5/17/2009      | 5 - 7 ft       | N              | --              | --             | 10 J             | --            | --               | --             | < 0.2            | --             | --              | < 2               | --            | --            | --          | --          | 12 J          | --               | --               | 458                | --             |

Table 5.5.7-3  
Soil Data - Metals  
SWMU 7  
Rhodia Silver Bow Plant  
[concentrations in mg/kg]

| Chemical Name<br>Analysis Location               |                |               |                | Antimony<br>Lab | Arsenic<br>Lab | Arsenic<br>Field | Barium<br>Lab | Beryllium<br>Lab | Cadmium<br>Lab | Cadmium<br>Field | Calcium<br>Lab | Chromium<br>Lab | Chromium<br>Field | Cobalt<br>Lab | Copper<br>Lab | Iron<br>Lab | Lead<br>Lab | Lead<br>Field | Magnesium<br>Lab | Manganese<br>Lab | Manganese<br>Field | Mercury<br>Lab |
|--------------------------------------------------|----------------|---------------|----------------|-----------------|----------------|------------------|---------------|------------------|----------------|------------------|----------------|-----------------|-------------------|---------------|---------------|-------------|-------------|---------------|------------------|------------------|--------------------|----------------|
| Background Mean, Exceedances <b>Bold</b>         |                |               |                | 0.50            | 23             | 23               | 150           | 0.51             | 1.6            | 1.6              | 3900           | 11              | 11                | 5.9           | 35            | 19600       | 17          | 17            | 3500             | 540              | 540                | 0.021          |
| Background Maximum, Exceedances <u>Underline</u> |                |               |                | 3.9             | 120            | 120              | <u>290</u>    | 1.3              | <u>8.9</u>     | <u>8.9</u>       | <u>14000</u>   | <u>48</u>       | <u>48</u>         | <u>9.5</u>    | 300           | 35300       | 190         | 190           | <u>5700</u>      | 1100             | 1100               | <u>0.20</u>    |
| Background 95% UCL, Exceedances <i>Italic</i>    |                |               |                | 1.0             | 40             | 40               | 165.1         | 0.546            | 1.057          | 1.057            | 4500           | 12.46           | 12.46             | 6.145         | 63.87         | 20600       | 34.98       | 34.98         | 3700             | 570              | 570                | 0.0381         |
| Location<br>ID                                   | Sample<br>Date | Depth         | Sample<br>Type |                 |                |                  |               |                  |                |                  |                |                 |                   |               |               |             |             |               |                  |                  |                    |                |
| EPP-12                                           | 5/17/2009      | 7.5 - 9.5 ft  | N              | --              | --             | 12 J             | --            | --               | --             | < 0.2            | --             | --              | < 2               | --            | --            | --          | --          | 10 J          | --               | --               | 353                | --             |
| EPP-13                                           | 5/18/2009      | 2 - 3 ft      | N              | 0.65            | 6.4            | 13 J             | 204           | 0.55 J           | 0.7 J          | < 0.2            | 7240           | 5.7             | < 2               | 7.5           | 17.9          | 18500       | 5.9 J       | 8 J           | 4330             | 553              | 593                | 0.052          |
| EPP-13                                           | 5/18/2009      | 3.5 - 5.5 ft  | N              | --              | --             | 11 J             | --            | --               | --             | < 0.2            | --             | --              | < 2               | --            | --            | --          | --          | 10 J          | --               | --               | 578                | --             |
| EPP-13                                           | 5/18/2009      | 6 - 8 ft      | N              | --              | --             | 13 J             | --            | --               | --             | < 0.2            | --             | --              | < 2               | --            | --            | --          | --          | 8 J           | --               | --               | 585                | --             |
| EPP-13                                           | 5/18/2009      | 8.5 - 10.5 ft | N              | --              | --             | 12 J             | --            | --               | --             | < 0.2            | --             | --              | < 2               | --            | --            | --          | --          | 9 J           | --               | --               | 525                | --             |
| EPP-14                                           | 5/19/2009      | 2 - 4 ft      | N              | 0.88            | 6.4            | 10 J             | 264           | 0.53 J           | < 0.2          | < 0.2            | 6660           | 4.1             | < 2               | 6.9           | 21.1          | 20000       | 4.6 J       | 8 J           | 3520             | 400              | 443                | 0.022          |
| EPP-14                                           | 5/19/2009      | 4.5 - 6.5 ft  | N              | --              | --             | 10 J             | --            | --               | --             | < 0.2            | --             | --              | < 2               | --            | --            | --          | --          | 7 J           | --               | --               | 473                | --             |
| EPP-14                                           | 5/19/2009      | 7 - 9 ft      | N              | --              | --             | 10 J             | --            | --               | --             | < 0.2            | --             | --              | < 2               | --            | --            | --          | --          | 6 J           | --               | --               | 435                | --             |
| EPP-14                                           | 5/19/2009      | 9.5 - 11.5 ft | N              | --              | --             | 11 J             | --            | --               | --             | < 0.2            | --             | --              | < 2               | --            | --            | --          | --          | 4 J           | --               | --               | 548                | --             |

Table 5.5.7-3  
Soil Data - Metals  
SWMU 7  
Rhodia Silver Bow Plant  
[concentrations in mg/kg]

| Chemical Name<br>Analysis Location               |                |                |                | Nickel<br>Lab | Potassium<br>Lab | Selenium<br>Lab | Selenium<br>Field | Silver<br>Lab    | Silver<br>Field  | Sodium<br>Lab | Thallium<br>Lab | Uranium<br>Lab | Uranium<br>Field | Vanadium<br>Lab | Vanadium<br>Field | Zinc<br>Lab  | Zinc<br>Field |
|--------------------------------------------------|----------------|----------------|----------------|---------------|------------------|-----------------|-------------------|------------------|------------------|---------------|-----------------|----------------|------------------|-----------------|-------------------|--------------|---------------|
| Background Mean, Exceedances <b>Bold</b>         |                |                |                | <b>5.3</b>    | <b>3000</b>      | <b>0.41</b>     | <b>0.41</b>       | <b>0.73 (1)</b>  | <b>0.73 (1)</b>  | <b>140</b>    | <b>0.35</b>     | <b>1.8</b>     | <b>1.8</b>       | <b>41</b>       | <b>41</b>         | <b>59</b>    | <b>59</b>     |
| Background Maximum, Exceedances <u>Underline</u> |                |                |                | <u>21</u>     | <u>5300</u>      | <u>0.70</u>     | <u>0.70</u>       | <u>1.7 (1)</u>   | <u>1.7 (1)</u>   | <u>620</u>    | <u>1.0</u>      | <u>4.1</u>     | <u>4.1</u>       | <u>83</u>       | <u>83</u>         | <u>380</u>   | <u>380</u>    |
| Background 95% UCL, Exceedances <i>Italic</i>    |                |                |                | <i>6.0</i>    | <i>3161</i>      | <i>0.47</i>     | <i>0.47</i>       | <i>0.346 (1)</i> | <i>0.346 (1)</i> | <i>220</i>    | <i>0.462</i>    | <i>2.0</i>     | <i>2.0</i>       | <i>43.3</i>     | <i>43.3</i>       | <i>98.46</i> | <i>98.46</i>  |
| Location<br>ID                                   | Sample<br>Date | Depth          | Sample<br>Type |               |                  |                 |                   |                  |                  |               |                 |                |                  |                 |                   |              |               |
| EPP-1                                            | 5/19/2009      | 2 - 4 ft       | N              | --            | --               | --              | < 0.7             | --               | < 1              | --            | --              | --             | <b>2 J</b>       | --              | 17 J              | --           | <b>136</b>    |
|                                                  |                |                | FD             | --            | --               | --              | < 1               | --               | < 2              | --            | --              | --             | < 8              | --              | <b>45 J</b>       | --           | <b>116</b>    |
| EPP-1                                            | 5/19/2009      | 4.5 - 6.5 ft   | N              | 4.6           | <b>3110</b>      | < 0.8           | < 3               | < 0.4            | < 0.4            | <b>302</b>    | <b>4,200 J</b>  | <b>9,710 J</b> | <b>11 J</b>      | <b>66.4</b>     | <b>60 J</b>       | <b>540</b>   | <b>586</b>    |
|                                                  |                |                | FD             | <b>5.9</b>    | <b>3130</b>      | <b>0.9 J</b>    | < 3               | < 0.4            | < 2              | <b>312</b>    | <b>4.69</b>     | <b>7.86</b>    | < 9              | <b>68.5</b>     | 30 J              | <b>466</b>   | <b>571</b>    |
| EPP-1                                            | 5/19/2009      | 7 - 9 ft       | N              | --            | --               | --              | <b>7 J</b>        | --               | < 2              | --            | --              | --             | < 9              | --              | <b>105 J</b>      | --           | <b>143</b>    |
|                                                  |                |                | FD             | --            | --               | --              | <b>10 J</b>       | --               | < 2              | --            | --              | --             | < 9              | --              | <b>45 J</b>       | --           | <b>164</b>    |
| EPP-1                                            | 5/19/2009      | 9.5 - 11.5 ft  | N              | --            | --               | --              | <b>1 J</b>        | --               | < 1              | --            | --              | --             | < 7              | --              | 21 J              | --           | <b>88</b>     |
|                                                  |                |                | FD             | --            | --               | --              | < 0.7             | --               | < 1              | --            | --              | --             | < 7              | --              | < 2               | --           | <b>60</b>     |
| EPP-2                                            | 5/18/2009      | 2 - 4 ft       | N              | --            | --               | --              | < 0.7             | --               | <b>1 J</b>       | --            | --              | --             | < 8              | --              | < 2               | --           | 33 J          |
| EPP-2                                            | 5/18/2009      | 4.5 - 6.5 ft   | N              | --            | --               | --              | < 1               | --               | < 2              | --            | --              | --             | < 9              | --              | 17 J              | --           | 33 J          |
| EPP-2                                            | 5/18/2009      | 7 - 9 ft       | N              | <b>7.5</b>    | <b>4180</b>      | < 0.8           | < 0.7             | < 0.5            | < 1              | <b>647</b>    | <b>0.457</b>    | <b>3.84</b>    | <b>2 J</b>       | <b>45.8</b>     | 30 J              | 53.4         | 41            |
| EPP-2                                            | 5/18/2009      | 9.5 - 11.5 ft  | N              | --            | --               | --              | < 0.7             | --               | < 1              | --            | --              | --             | < 7              | --              | < 12              | --           | 39            |
| EPP-3                                            | 5/18/2009      | 3 - 4 ft       | N              | <b>5.8</b>    | <b>3400</b>      | < 0.8           | < 0.7             | < 0.5            | < 1              | <b>269</b>    | 0.291           | <b>1.9</b>     | < 7              | 34.4            | < 2               | <b>70.8</b>  | <b>75</b>     |
| EPP-3                                            | 5/18/2009      | 5 - 7 ft       | N              | --            | --               | --              | < 0.7             | --               | < 1              | --            | --              | --             | < 6              | --              | < 2               | --           | 36            |
| EPP-3                                            | 5/18/2009      | 8 - 10 ft      | N              | --            | --               | --              | < 0.7             | --               | < 1              | --            | --              | --             | < 7              | --              | 8 J               | --           | 39            |
| EPP-3                                            | 5/18/2009      | 10.5 - 12.5 ft | N              | --            | --               | --              | < 0.7             | --               | < 1              | --            | --              | --             | < 7              | --              | <b>60 J</b>       | --           | 38            |
| EPP-4                                            | 5/18/2009      | 13 - 15 ft     | N              | --            | --               | --              | < 1               | --               | < 1              | --            | --              | --             | < 8              | --              | <b>45 J</b>       | --           | 44            |
| EPP-4                                            | 5/18/2009      | 15.5 - 17.5 ft | N              | <b>7.1</b>    | <b>4910</b>      | < 0.8           | < 1               | < 0.5            | < 1              | <b>897</b>    | <b>0.425</b>    | 1.79           | < 9              | <b>42.6</b>     | <b>45 J</b>       | <b>67.8</b>  | 54            |
| EPP-4                                            | 5/18/2009      | 18 - 20 ft     | N              | --            | --               | --              | < 1               | --               | <b>12 J</b>      | --            | --              | --             | < 8              | --              | 17 J              | --           | 40            |
| EPP-4                                            | 5/18/2009      | 20.5 - 22.5 ft | N              | --            | --               | --              | < 1               | --               | < 1              | --            | --              | --             | < 8              | --              | 26 J              | --           | 54            |
| EPP-5                                            | 5/16/2009      | 5 - 6 ft       | N              | --            | --               | --              | < 1               | --               | < 1              | --            | --              | --             | < 7              | --              | <b>45 J</b>       | --           | 41            |
| EPP-5                                            | 5/16/2009      | 7 - 9 ft       | N              | <b>7.1</b>    | <b>5740</b>      | < 0.9           | < 1               | < 0.5            | < 1              | <b>1940</b>   | <b>0.445</b>    | 1.53           | < 8              | <b>46.2</b>     | < 2               | 57.1         | 41            |
| EPP-5                                            | 5/16/2009      | 10 - 11 ft     | N              | --            | --               | --              | < 1               | --               | < 1              | --            | --              | --             | < 8              | --              | 15 J              | --           | 41            |
| EPP-5                                            | 5/16/2009      | 12 - 14 ft     | N              | --            | --               | --              | < 1               | --               | < 1              | --            | --              | --             | < 8              | --              | 3 J               | --           | 40            |
| EPP-6                                            | 5/16/2009      | 3 - 5.5 ft     | N              | --            | --               | --              | < 0.7             | --               | < 1              | --            | --              | --             | < 7              | --              | < 11              | --           | 44            |
| EPP-6                                            | 5/16/2009      | 5.5 - 8 ft     | N              | 5.3           | <b>4300</b>      | < 0.8           | < 1               | < 0.5            | < 1              | <b>1230</b>   | <b>0.401</b>    | <b>3.06</b>    | < 7              | 33.8            | 8 J               | 44.6         | 45            |
| EPP-6                                            | 5/16/2009      | 8.5 - 10.5 ft  | N              | --            | --               | --              | < 0.7             | --               | < 1              | --            | --              | --             | < 7              | --              | <b>45 J</b>       | --           | 46            |
| EPP-6                                            | 5/16/2009      | 11 - 13 ft     | N              | --            | --               | --              | < 0.7             | --               | < 1              | --            | --              | --             | < 7              | --              | 20 J              | --           | 52            |
| EPP-7                                            | 5/16/2009      | 2 - 4 ft       | N              | --            | --               | --              | < 0.7             | --               | < 1              | --            | --              | --             | < 7              | --              | 27 J              | --           | 28 J          |
| EPP-7                                            | 5/16/2009      | 5 - 7 ft       | N              | --            | --               | --              | < 0.7             | --               | < 1              | --            | --              | --             | < 7              | --              | < 26              | --           | 33 J          |
| EPP-7                                            | 5/16/2009      | 7.5 - 9.5 ft   | N              | --            | --               | --              | < 0.7             | --               | < 1              | --            | --              | --             | < 6              | --              | < 2               | --           | 22 J          |
| EPP-7                                            | 5/16/2009      | 10 - 12 ft     | N              | 3.0 J         | 2370             | < 0.8           | < 0.7             | < 0.4            | < 2              | <b>712</b>    | 0.18            | 1              | < 8              | <b>46.6</b>     | 21 J              | 25.3         | 29 J          |
| EPP-8                                            | 5/16/2009      | 1 - 3.5 ft     | N              | 4.6 J         | <b>3180</b>      | < 0.8           | < 1               | < 0.5            | <b>2 J</b>       | <b>338</b>    | <b>0.393</b>    | <b>3.7</b>     | < 7              | <b>42.2</b>     | 6 J               | <b>61.3</b>  | <b>62</b>     |
| EPP-8                                            | 5/16/2009      | 5 - 6 ft       | N              | --            | --               | --              | < 0.7             | --               | < 1              | --            | --              | --             | < 8              | --              | 8 J               | --           | 38            |
| EPP-8                                            | 5/16/2009      | 6.5 - 8.5 ft   | N              | --            | --               | --              | < 0.7             | --               | < 1              | --            | --              | --             | < 7              | --              | < 2               | --           | 40            |
| EPP-8                                            | 5/16/2009      | 9 - 11 ft      | N              | --            | --               | --              | < 1               | --               | < 1              | --            | --              | --             | < 7              | --              | < 2               | --           | 37            |
| EPP-9                                            | 5/17/2009      | 0 - 2 ft       | N              | <b>35.4</b>   | <b>3770</b>      | <b>3.2</b>      | < 1               | <b>1.4 J</b>     | <b>3 J</b>       | <b>404</b>    | <b>0.799</b>    | <b>14.9</b>    | < 8              | <b>130</b>      | <b>210</b>        | <b>88.4</b>  | <b>88</b>     |
| EPP-9                                            | 5/17/2009      | 3 - 5 ft       | N              | --            | --               | --              | < 1               | --               | < 1              | --            | --              | --             | < 6              | --              | 12 J              | --           | 45            |
| EPP-9                                            | 5/17/2009      | 5.5 - 7.5 ft   | N              | --            | --               | --              | < 0.7             | --               | < 1              | --            | --              | --             | < 7              | --              | < 2               | --           | 41            |
| EPP-9                                            | 5/17/2009      | 8 - 10 ft      | N              | --            | --               | --              | < 0.7             | --               | < 0.4            | --            | --              | --             | < 6              | --              | < 2               | --           | 46            |
| EPP-10                                           | 5/17/2009      | 7 - 8 ft       | N              | <b>6.2</b>    | 2900             | < 0.8           | < 1               | <b>0.5 J</b>     | < 1              | <b>261</b>    | <b>2.87</b>     | 1.39           | < 7              | 33.1            | 30 J              | 57.3         | 58            |
| EPP-10                                           | 5/17/2009      | 9 - 11 ft      | N              | --            | --               | --              | < 1               | --               | < 1              | --            | --              | --             | < 6              | --              | < 2               | --           | 40            |
| EPP-10                                           | 5/17/2009      | 12 - 14 ft     | N              | --            | --               | --              | < 1               | --               | < 1              | --            | --              | --             | < 7              | --              | < 2               | --           | 41            |
| EPP-10                                           | 5/17/2009      | 15 - 17 ft     | N              | --            | --               | --              | < 0.7             | --               | < 1              | --            | --              | --             | < 6              | --              | < 2               | --           | 38            |
| EPP-11                                           | 5/17/2009      | 2.5 - 4.5 ft   | N              | --            | --               | --              | < 0.7             | --               | < 1              | --            | --              | --             | <b>9 J</b>       | --              | < 2               | --           | <b>193</b>    |
| EPP-11                                           | 5/17/2009      | 5 - 7 ft       | N              | <b>19.9</b>   | <b>3550</b>      | <b>3.8</b>      | <b>7 J</b>        | <b>2.0 J</b>     | < 0.4            | <b>676</b>    | <b>1.51</b>     | <b>20.1</b>    | <b>12 J</b>      | <b>114</b>      | <b>105 J</b>      | <b>375</b>   | <b>375</b>    |
| EPP-11                                           | 5/17/2009      | 7.5 - 9.5 ft   | N              | --            | --               | --              | < 1               | --               | < 1              | --            | --              | --             | < 6              | --              | < 2               | --           | 35 J          |
| EPP-11                                           | 5/17/2009      | 10 - 12 ft     | N              | --            | --               | --              | < 0.7             | --               | < 1              | --            | --              | --             | < 5              | --              | < 2               | --           | 42            |
| EPP-12                                           | 5/17/2009      | 0 - 2 ft       | N              | <b>5.7</b>    | <b>3860</b>      | <b>1.2 J</b>    | < 1               | < 0.5            | < 1              | <b>324</b>    | <b>0.706</b>    | <b>2.66</b>    | < 8              | <b>46.5</b>     | 26 J              | <b>76.7</b>  | <b>82</b>     |
| EPP-12                                           | 5/17/2009      | 2.5 - 4.5 ft   | N              | --            | --               | --              | < 0.7             | --               | < 1              | --            | --              | --             | < 7              | --              | < 2               | --           | 43            |
| EPP-12                                           | 5/17/2009      | 5 - 7 ft       | N              | --            | --               | --              | < 0.7             | --               | < 1              | --            | --              | --             | < 6              | --              | < 2               | --           | 38            |

Table 5.5.7-3  
Soil Data - Metals  
SWMU 7  
Rhodia Silver Bow Plant  
[concentrations in mg/kg]

| Chemical Name<br>Analysis Location               |                |               |                | Nickel<br>Lab | Potassium<br>Lab | Selenium<br>Lab | Selenium<br>Field | Silver<br>Lab | Silver<br>Field | Sodium<br>Lab | Thallium<br>Lab | Uranium<br>Lab | Uranium<br>Field | Vanadium<br>Lab | Vanadium<br>Field | Zinc<br>Lab | Zinc<br>Field |
|--------------------------------------------------|----------------|---------------|----------------|---------------|------------------|-----------------|-------------------|---------------|-----------------|---------------|-----------------|----------------|------------------|-----------------|-------------------|-------------|---------------|
| Background Mean, Exceedances <b>Bold</b>         |                |               |                | 5.3           | 3000             | 0.41            | 0.41              | 0.73 (1)      | 0.73 (1)        | 140           | 0.35            | 1.8            | 1.8              | 41              | 41                | 59          | 59            |
| Background Maximum, Exceedances <u>Underline</u> |                |               |                | 21            | 5300             | 0.70            | 0.70              | 1.7 (1)       | 1.7 (1)         | 620           | 1.0             | 4.1            | 4.1              | 83              | 83                | 380         | 380           |
| Background 95% UCL, Exceedances <i>Italic</i>    |                |               |                | 6.0           | 3161             | 0.47            | 0.47              | 0.346 (1)     | 0.346 (1)       | 220           | 0.462           | 2.0            | 2.0              | 43.3            | 43.3              | 98.46       | 98.46         |
| Location<br>ID                                   | Sample<br>Date | Depth         | Sample<br>Type |               |                  |                 |                   |               |                 |               |                 |                |                  |                 |                   |             |               |
| EPP-12                                           | 5/17/2009      | 7.5 - 9.5 ft  | N              | --            | --               | --              | < 1               | --            | < 1             | --            | --              | --             | < 6              | --              | 14 J              | --          | 39            |
| EPP-13                                           | 5/18/2009      | 2 - 3 ft      | N              | 4.4 J         | 4450             | < 0.9           | < 1               | < 0.5         | < 1             | 423           | 0.372           | 2.18           | < 6              | 33.8            | 17 J              | 41          | 54            |
| EPP-13                                           | 5/18/2009      | 3.5 - 5.5 ft  | N              | --            | --               | --              | < 0.7             | --            | < 1             | --            | --              | --             | < 7              | --              | < 17              | --          | 30 J          |
| EPP-13                                           | 5/18/2009      | 6 - 8 ft      | N              | --            | --               | --              | < 1               | --            | < 1             | --            | --              | --             | < 7              | --              | 12 J              | --          | 40            |
| EPP-13                                           | 5/18/2009      | 8.5 - 10.5 ft | N              | --            | --               | --              | < 0.7             | --            | < 1             | --            | --              | --             | < 7              | --              | < 2               | --          | 46            |
| EPP-14                                           | 5/19/2009      | 2 - 4 ft      | N              | 3.5 J         | 3320             | < 0.9           | < 0.7             | < 0.5         | < 1             | 554           | 0.246           | 2.28           | 2 J              | 31.4            | < 2               | 36.8        | 34 J          |
| EPP-14                                           | 5/19/2009      | 4.5 - 6.5 ft  | N              | --            | --               | --              | < 1               | --            | < 1             | --            | --              | --             | < 6              | --              | 30 J              | --          | 41            |
| EPP-14                                           | 5/19/2009      | 7 - 9 ft      | N              | --            | --               | --              | < 1               | --            | < 1             | --            | --              | --             | < 6              | --              | < 2               | --          | 38            |
| EPP-14                                           | 5/19/2009      | 9.5 - 11.5 ft | N              | --            | --               | --              | < 0.7             | --            | < 1             | --            | --              | --             | < 0.02           | --              | < 2               | --          | 34 J          |

Table 5.5.7-4  
Soil Data - SVOCS  
SWMU 7  
Rhodia Silver Bow Plant  
[concentrations in mg/kg]

| Chemical Name  |                |          |                | 1,2,4-<br>Trichlorobenzene | 1,2-<br>Dichlorobenzene | 1,2-<br>Diphenylhydrazine | 1,3-<br>Dichlorobenzene | 1,4-<br>Dichlorobenzene | 2,4,5-<br>Trichlorophenol | 2,4,6-<br>Trichlorophenol | 2,4-<br>Dichlorophenol | 2,4-<br>Dimethylphenol | 2,4-<br>Dinitrophenol | 2,4-<br>Dinitrotoluene | 2,6-<br>Dinitrotoluene | 2-Chloronaphthalene | 2-Chlorophenol |
|----------------|----------------|----------|----------------|----------------------------|-------------------------|---------------------------|-------------------------|-------------------------|---------------------------|---------------------------|------------------------|------------------------|-----------------------|------------------------|------------------------|---------------------|----------------|
| Location<br>ID | Sample<br>Date | Depth    | Sample<br>Type |                            |                         |                           |                         |                         |                           |                           |                        |                        |                       |                        |                        |                     |                |
| EPP-14         | 5/19/2009      | 7 - 9 ft | N              | < 0.011                    | < 0.018                 | < 0.015                   | < 0.019                 | < 0.018                 | < 0.018                   | < 0.015                   | < 0.017                | < 0.016                | < 0.12                | < 0.015                | < 0.016                | < 0.010             | < 0.0099       |

Table 5.5.7-4  
Soil Data - SVOCS  
SWMU 7  
Rhodia Silver Bow Plant  
[concentrations in mg/kg]

| Chemical Name |             |          |             | 2-Methyl-4,6-dinitrophenol | 2-Methylnaphthalene | 2-Nitroaniline | 2-Nitrophenol | 3,3'-Dichlorobenzidine | 3-Nitroaniline | 4-Bromophenyl phenyl ether | 4-Chloro-3-methylphenol | 4-Chloroaniline | 4-Chlorophenyl phenyl ether | 4-Nitroaniline | 4-Nitrophenol | Acenaphthene | Acenaphthylene | Anthracene | Benzidine |
|---------------|-------------|----------|-------------|----------------------------|---------------------|----------------|---------------|------------------------|----------------|----------------------------|-------------------------|-----------------|-----------------------------|----------------|---------------|--------------|----------------|------------|-----------|
| Location ID   | Sample Date | Depth    | Sample Type |                            |                     |                |               |                        |                |                            |                         |                 |                             |                |               |              |                |            |           |
| EPP-14        | 5/19/2009   | 7 - 9 ft | N           | < 0.15                     | 0.062 J             | < 0.017        | < 0.014       | < 0.027                | < 0.18         | < 0.013                    | < 0.017                 | < 0.015         | < 0.016                     | < 0.18         | < 0.15        | 0.23 J       | < 0.016        | 0.25 J     | < 0.42 R  |

Table 5.5.7-4  
Soil Data - SVOCS  
SWMU 7  
Rhodia Silver Bow Plant  
[concentrations in mg/kg]

| Chemical Name  |                |          |                | Benzo(a)<br>anthracene | Benzo(a)<br>pyrene | Benzo(b)<br>fluoranthene | Benzo(g,h,i)<br>perylene | Benzo(k)<br>fluoranthene | Benzoic<br>Acid | Benzyl<br>alcohol | Bis(2-<br>chloroethoxy)methane | Bis(2-<br>chloroethyl)ether | Bis(2-<br>chloroisopropyl)ether | Bis(2-<br>ethylhexyl)phthalate | Butyl benzyl<br>phthalate | Carbazole | Chrysene | Dibenz(a,h)<br>anthracene | Dibenzofuran | Diethyl<br>phthalate |
|----------------|----------------|----------|----------------|------------------------|--------------------|--------------------------|--------------------------|--------------------------|-----------------|-------------------|--------------------------------|-----------------------------|---------------------------------|--------------------------------|---------------------------|-----------|----------|---------------------------|--------------|----------------------|
| Location<br>ID | Sample<br>Date | Depth    | Sample<br>Type |                        |                    |                          |                          |                          |                 |                   |                                |                             |                                 |                                |                           |           |          |                           |              |                      |
| EPP-14         | 5/19/2009      | 7 - 9 ft | N              | 0.16 J                 | 0.077 J            | 0.10 J                   | 0.038 J                  | 0.045 J                  | < 0.14          | < 0.017           | < 0.011                        | < 0.012                     | < 0.015                         | < 0.019                        | < 0.017                   | 0.059 J   | 0.17 J   | < 0.028                   | 0.12 J       | < 0.015              |

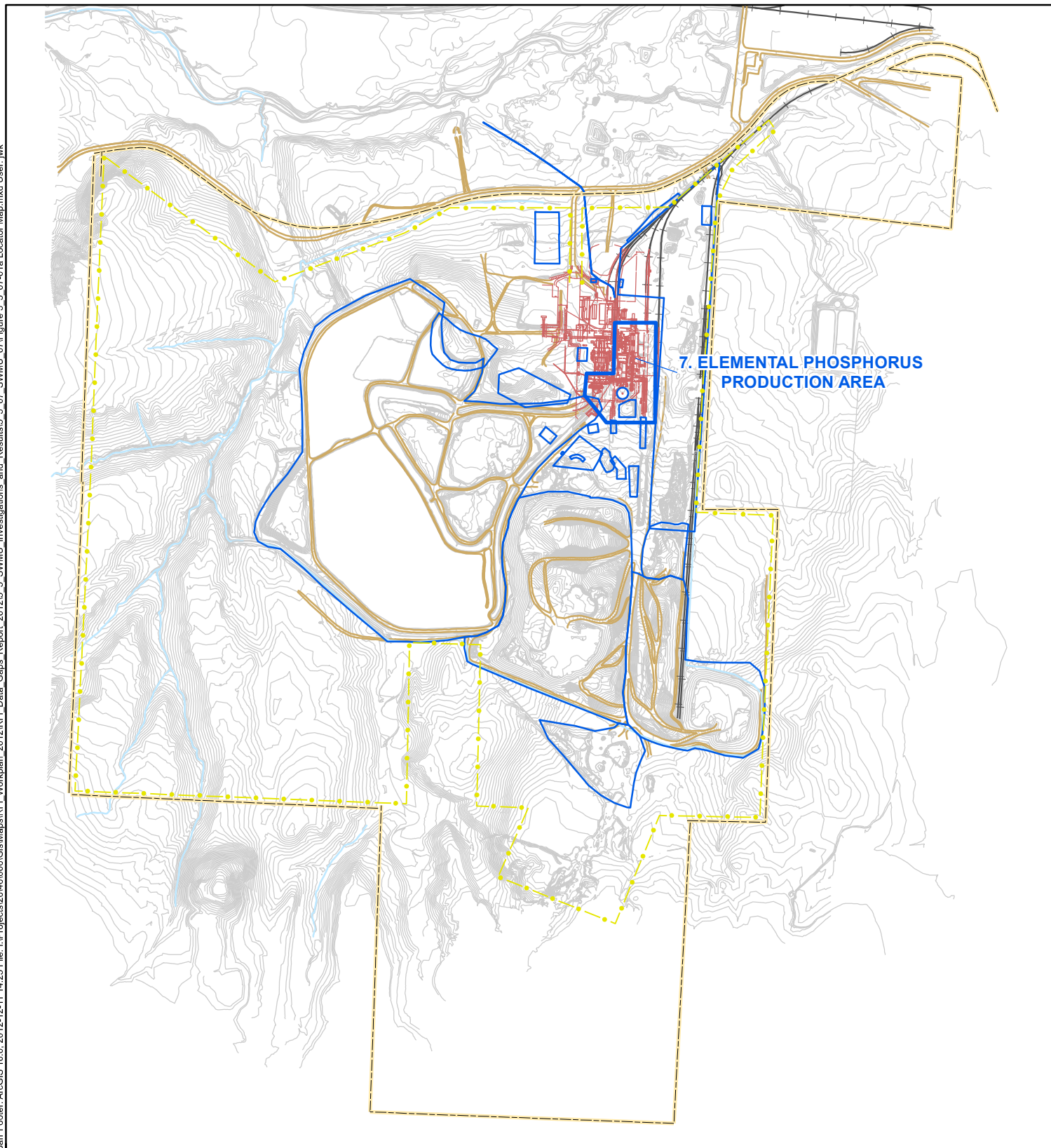
Table 5.5.7-4  
Soil Data - SVOCS  
SWMU 7  
Rhodia Silver Bow Plant  
[concentrations in mg/kg]

| Chemical Name  |                |          |                | Dimethyl<br>phthalate | Di-n-butyl<br>phthalate | Di-n-octyl<br>phthalate | Fluoranthene | Fluorene | Hexachlorobenzene | Hexachlorobutadiene | Hexachlorocyclopentadiene | Hexachloroethane | Indeno(1,2,3-<br>cd)pyrene | Isophorone | Naphthalene | Nitrobenzene | N-Nitrosodimethylamine | N-Nitrosodi-n-<br>propylamine |
|----------------|----------------|----------|----------------|-----------------------|-------------------------|-------------------------|--------------|----------|-------------------|---------------------|---------------------------|------------------|----------------------------|------------|-------------|--------------|------------------------|-------------------------------|
| Location<br>ID | Sample<br>Date | Depth    | Sample<br>Type |                       |                         |                         |              |          |                   |                     |                           |                  |                            |            |             |              |                        |                               |
| EPP-14         | 5/19/2009      | 7 - 9 ft | N              | < 0.017               | < 0.013                 | < 0.024                 | 0.63         | 0.22 J   | < 0.015           | < 0.015             | < 0.013                   | < 0.022          | < 0.039                    | < 0.014    | 0.040 J     | < 0.027      | < 0.026                | < 0.020                       |

Table 5.5.7-4  
Soil Data - SVOCS  
SWMU 7  
Rhodia Silver Bow Plant  
[concentrations in mg/kg]

| Chemical Name |             |          |             | N-Nitrosodiphenylamine | o-Cresol | p-Cresol | Pentachlorophenol | Phenanthrene | Phenol  | Pyrene | Pyridine |
|---------------|-------------|----------|-------------|------------------------|----------|----------|-------------------|--------------|---------|--------|----------|
| Location ID   | Sample Date | Depth    | Sample Type |                        |          |          |                   |              |         |        |          |
| EPP-14        | 5/19/2009   | 7 - 9 ft | N           | < 0.018                | < 0.017  | < 0.017  | < 0.13            | 0.91         | < 0.020 | 0.52   | < 0.020  |

## Figures



- |                                                                                    |                         |                                                                                     |                   |
|------------------------------------------------------------------------------------|-------------------------|-------------------------------------------------------------------------------------|-------------------|
|  | SWMU 7                  |  | Property Boundary |
|  | Other SWMUs             |  | Fence Line        |
|  | Elevation Contour       |                                                                                     |                   |
|  | Drainage                |                                                                                     |                   |
|  | Railroad                |                                                                                     |                   |
|  | Road                    |                                                                                     |                   |
|  | Former Plant Structures |                                                                                     |                   |

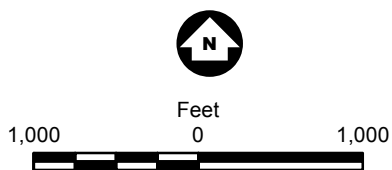
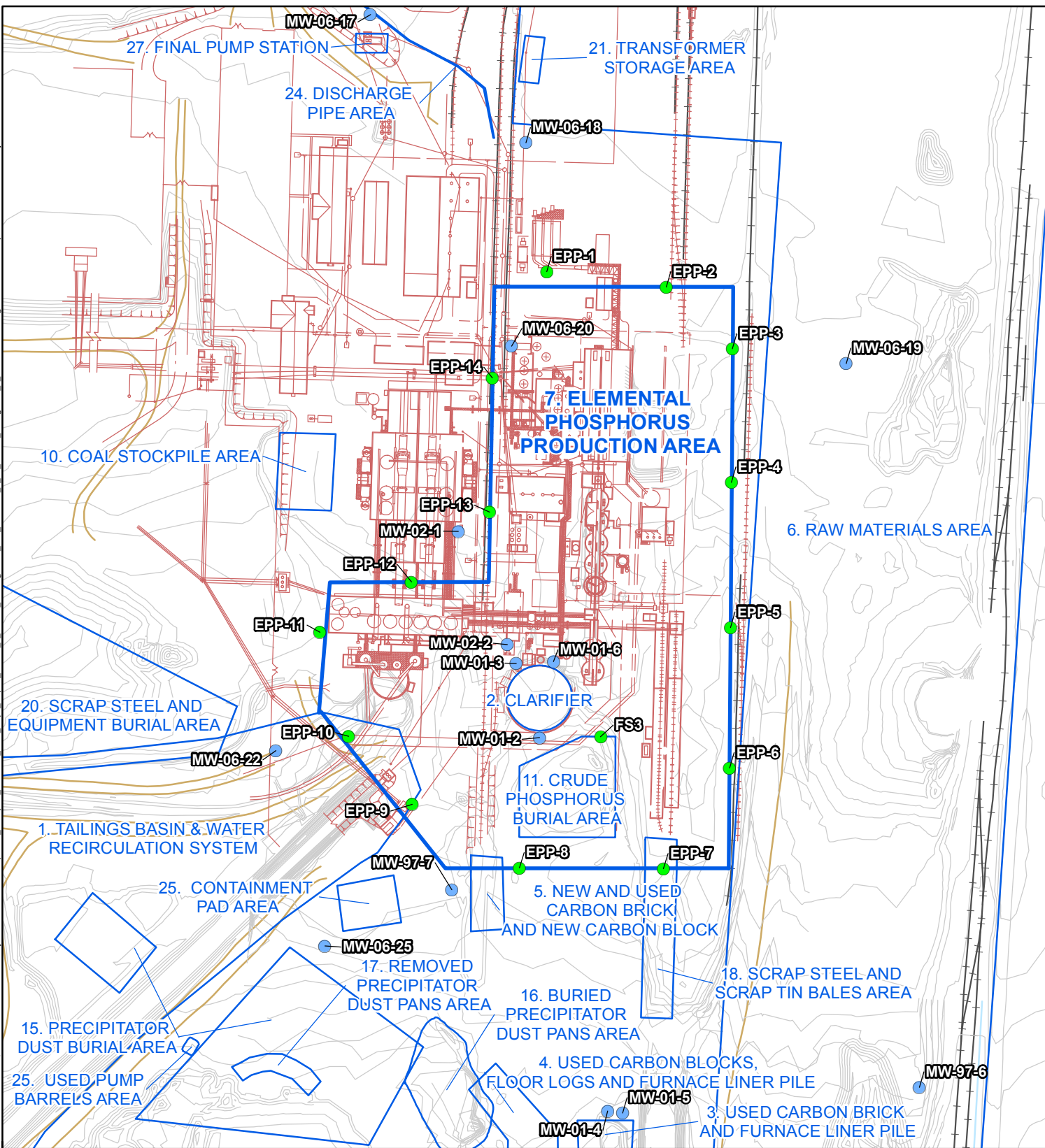


Figure 5.5.7-1a

**SWMU 7 LOCATION**  
Rhodia Silver Bow Plant  
Montana

Bar Footer: ArcGIS 10.0, 2012-12-11 14:27 File: I:\Projects\2646006\GIS\Mapa\RFI\_Workplan\_2012\RFI\_Data\_Gaps\_Report\_2012\5\_SWMU\_Investigations\_and\_Results\5.5.7-1b\_Monitoring\_Stations\_and\_Sample\_Locations.mxd User: jwk



- Monitoring Well
- Soil Sample
- SWMU 7
- Other SWMUs
- Elevation Contour
- Drainage
- Railroad
- Road
- Former Plant Structures

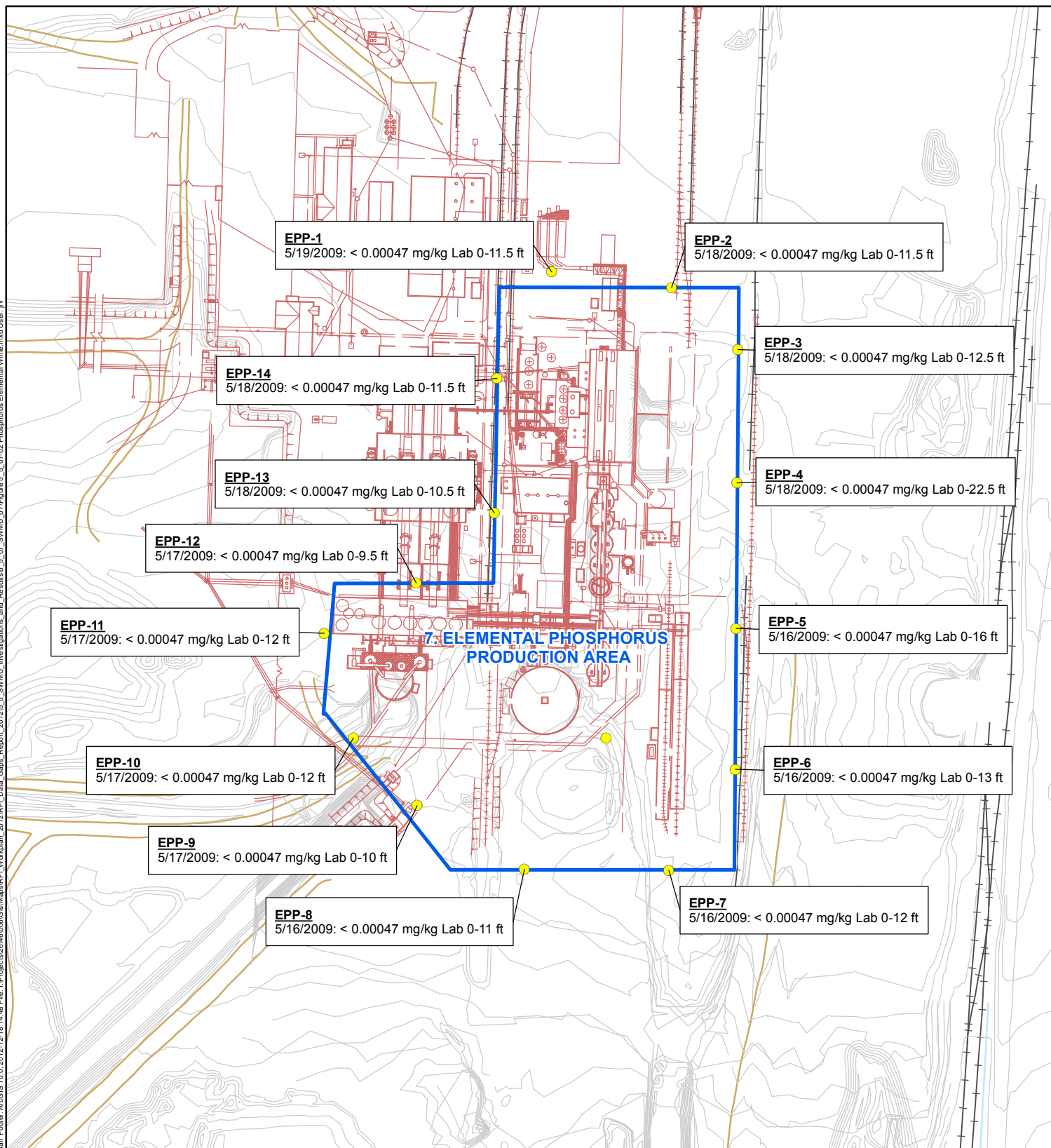


200 Feet 0 200

Figure 5.5.7-1b

SWMU 7  
MONITORING STATIONS  
AND SAMPLE LOCATIONS  
Rhodia Silver Bow Plant  
Montana

Bar Footer ArcGIS 10.0, 2012-12-18 14:48 File: I:\Project\2014\006\GaMa\MapRFI\_Workplan\_2012\FI\_Data\_Gaps\_Report\_2012\5\_SWMU\_investigations\_and\_results\_5\_of\_SWMU\_07\Figure 5.5.7-2 Phosphorus Elemental White.mxd User: jw



● Sample Location

■ SWMU 7

— Elevation Contour

— Drainage

— Railroad

— Road

— Former Plant Structures

**Bold font indicates that sample concentration is greater than the 95% UCL of mean Reference Area Concentration.**

200 0 200  
Feet



Figure 5.5.7-2

SWMU 7  
PHOSPHORUS, ELEMENTAL (WHITE)  
Rhodia Silver Bow Plant  
Montana

Bar Footer ArcGIS 10.0, 2012-12-18 14:48 File: I:\Project\2014\006\GaMa\MapRF\Workplan\_2012\FI Data Caps Report\_2012\5 SWMU Investigations and Results\_5.07\03 Radium 226 Thorium 232 Uranium 238.mxd User: jv

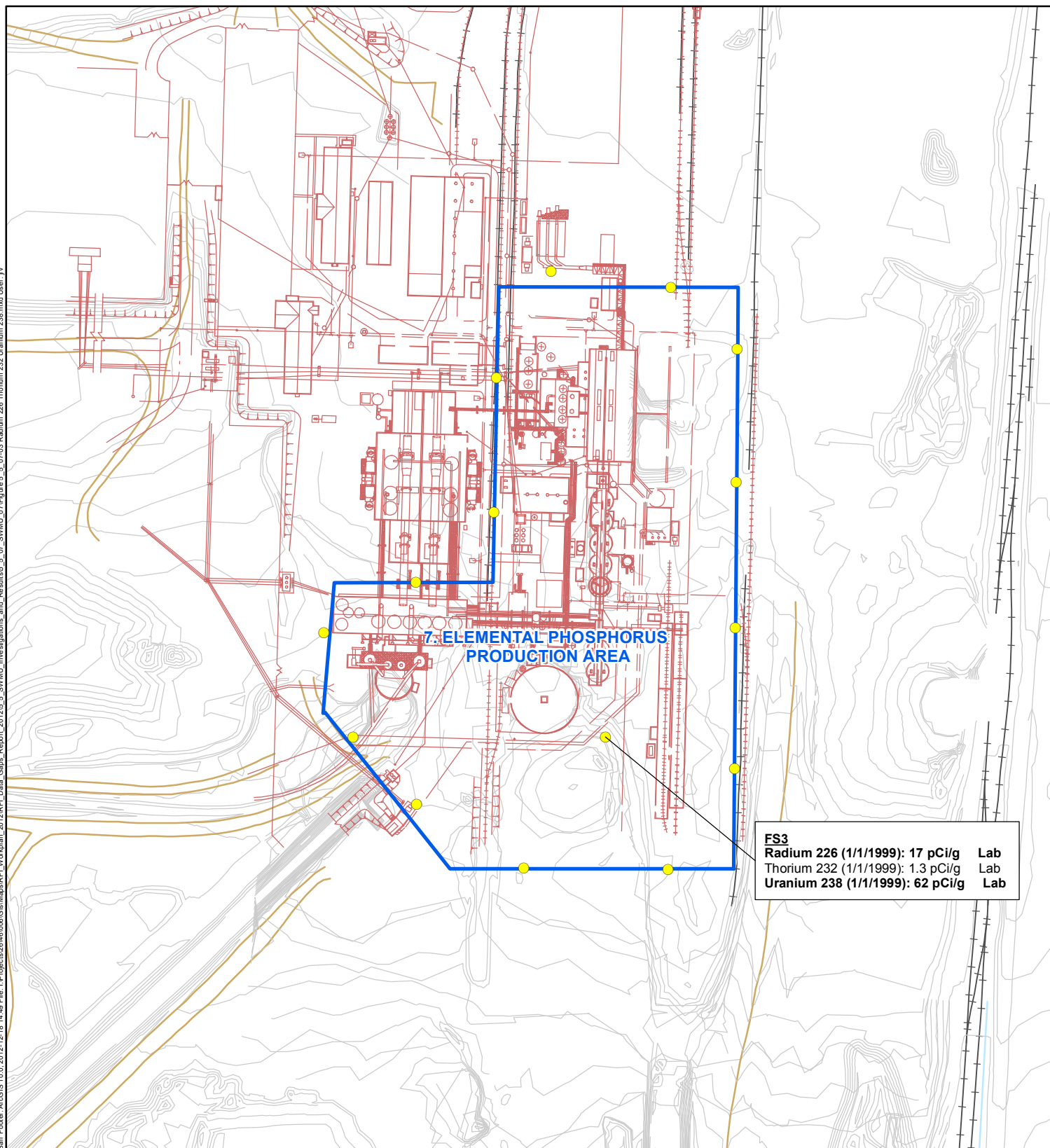


Figure 5.5.7-3

SWMU 7  
RADIUM 226, THORIUM 232,  
AND URANIUM 238  
Rhodia Silver Bow Plant  
Montana

● Sample Location

□ SWMU 7

— Elevation Contour

— Drainage

— Railroad

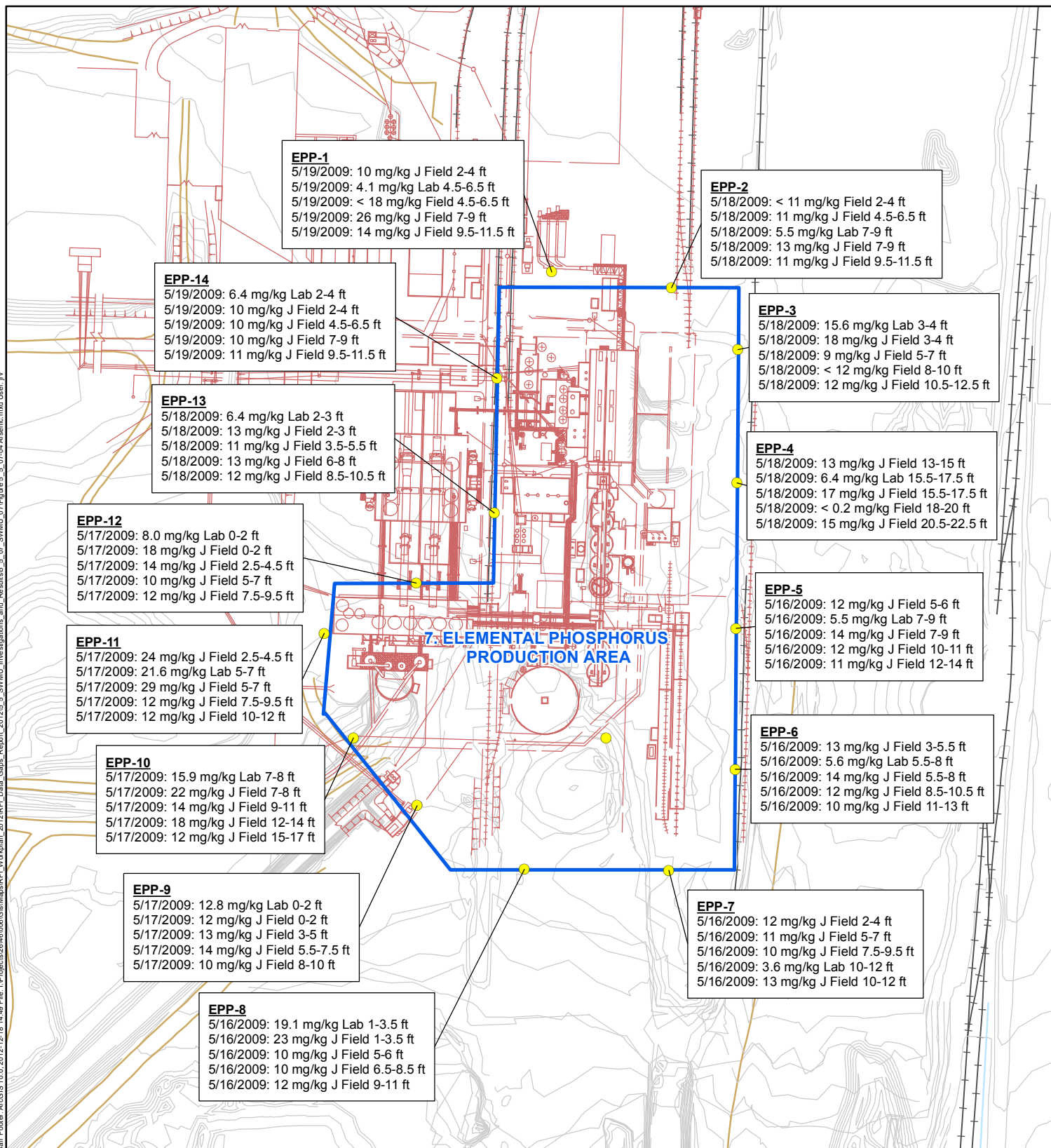
— Road

— Former Plant Structures

**Bold font indicates that sample concentration is greater than the 95% UCL of mean Reference Area Concentration.**

200 0 200  
Feet

Bar Footer ArcGIS 10.0, 2012-12-18 14:48 File: I:\Projects\2014\06\006\GAS\Map\REFI\_Workplan\_2012\FI\_Data\_Gaps\_Report\_2012\5\_SWMU\_Investigations\_and\_Results\_5\_of\_SWMU\_07\Figure 5.5.7-4 Arsenic.mxd User: jv



- Sample Location
- SWMU 7
- Elevation Contour
- Drainage
- Railroad
- Road
- Former Plant Structures

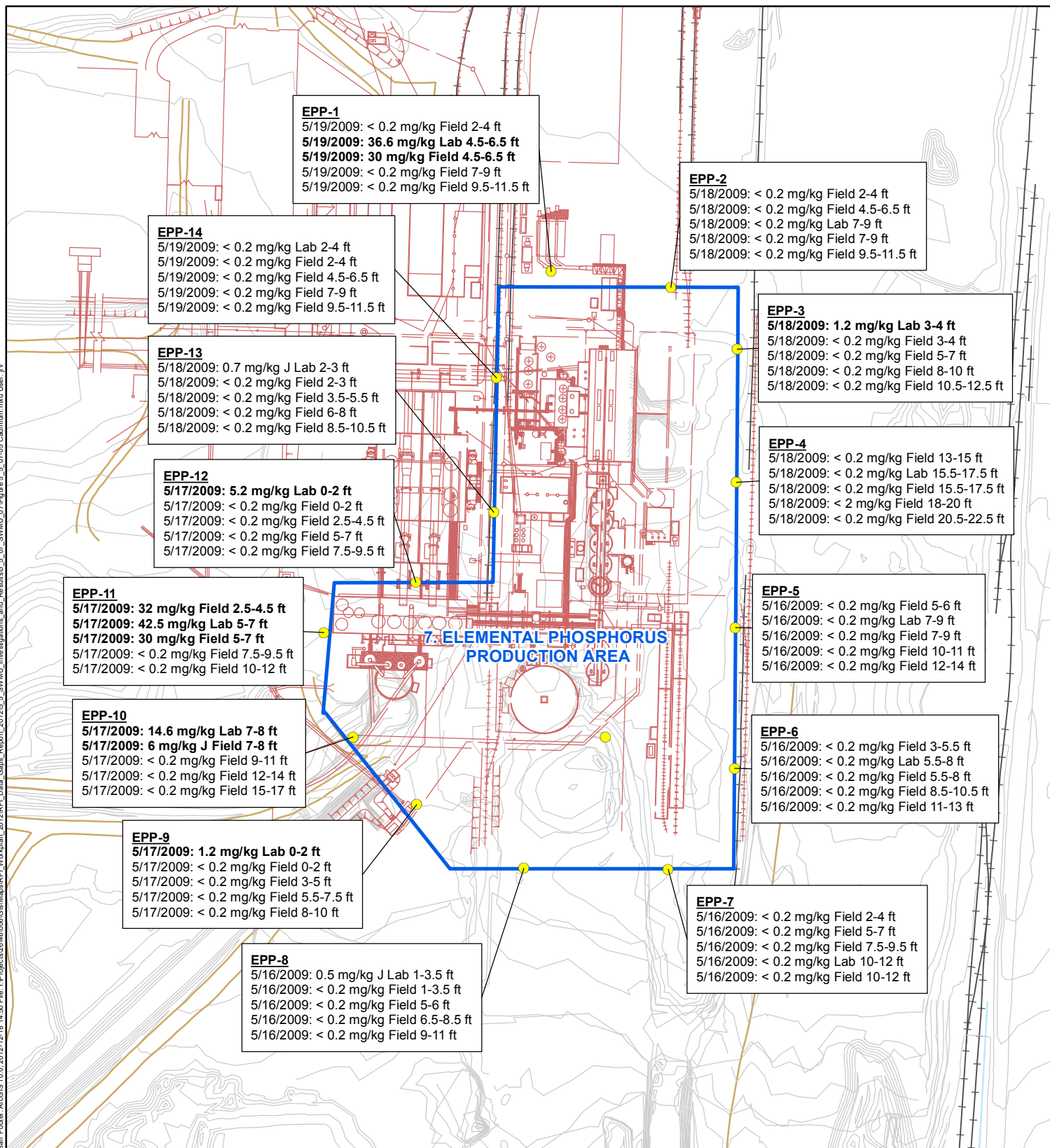
**Bold font indicates that sample concentration is greater than the 95% UCL of mean Reference Area Concentration.**

200 0 200  
Feet



Figure 5.5.7-4

**SWMU 7  
 ARSENIC  
 Rhodia Silver Bow Plant  
 Montana**



● Sample Location

□ SWMU 7

— Elevation Contour

— Drainage

— Railroad

— Road

— Former Plant Structures

**Bold font indicates that sample concentration is greater than the 95% UCL of mean Reference Area Concentration.**

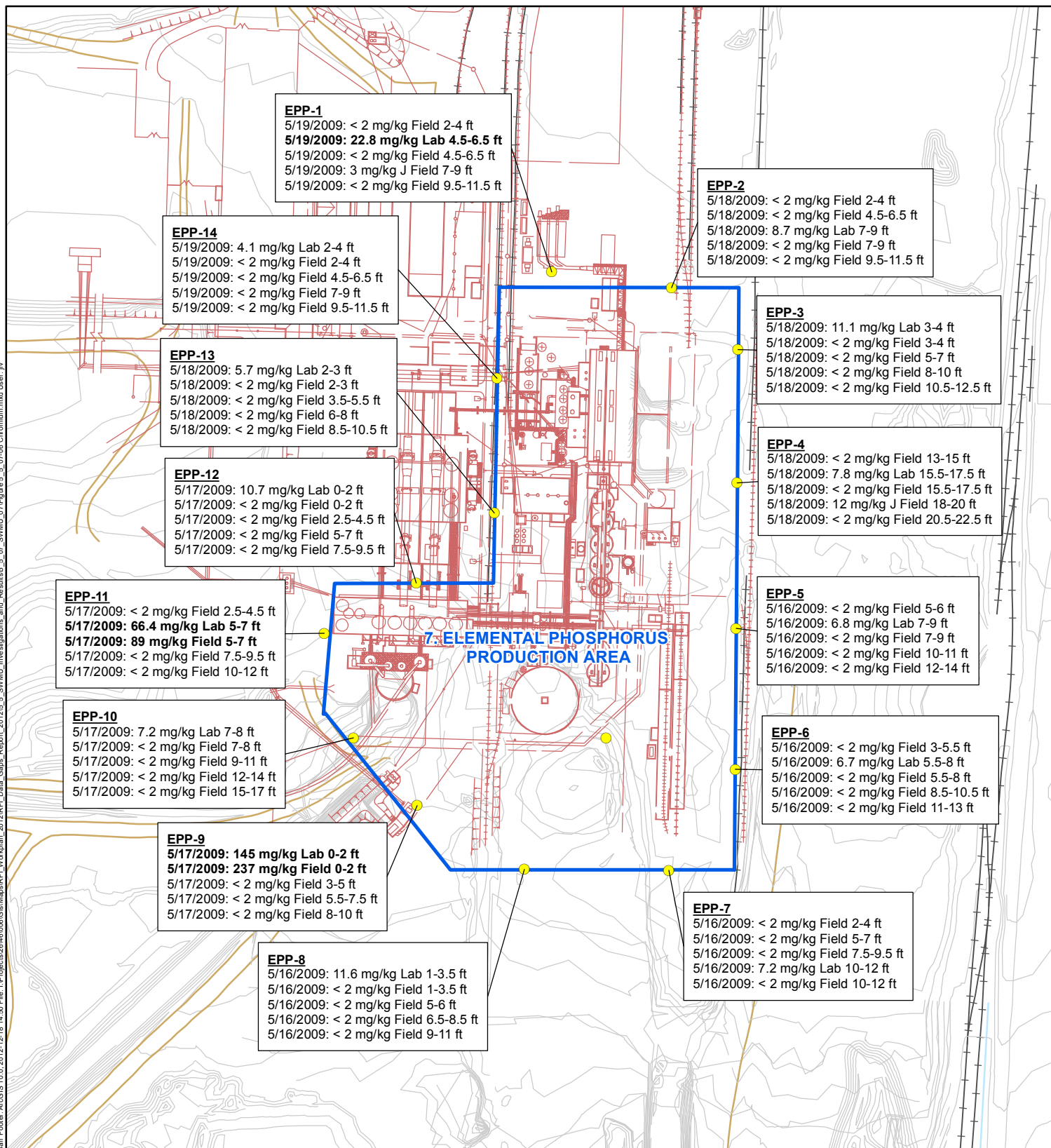
200 0 200  
Feet



Figure 5.5.7-5

**SWMU 7  
CADMIUM  
Rhodia Silver Bow Plant  
Montana**

Bar Footer ArcGIS 10.0, 2012-12-18 14:50 File: I:\Project\2014\006\GIS\MapInfo\Workplan\_2012\Figure 5.5 of SWMU 07\Figure 5.5 of SWMU 07\Figure 5.5 of SWMU 07\Figure 5.5 of SWMU 07\Figure 5.5 of SWMU 07\Figure 5.5 of SWMU 07\Figure 5.5 of SWMU 07\Figure 5.5 of SWMU 07\Figure 5.5 of SWMU 07\Figure 5.5 of SWMU 07



● Sample Location

□ SWMU 7

— Elevation Contour

— Drainage

— Railroad

— Road

— Former Plant Structures

**Bold font indicates that sample concentration is greater than the 95% UCL of mean Reference Area Concentration.**

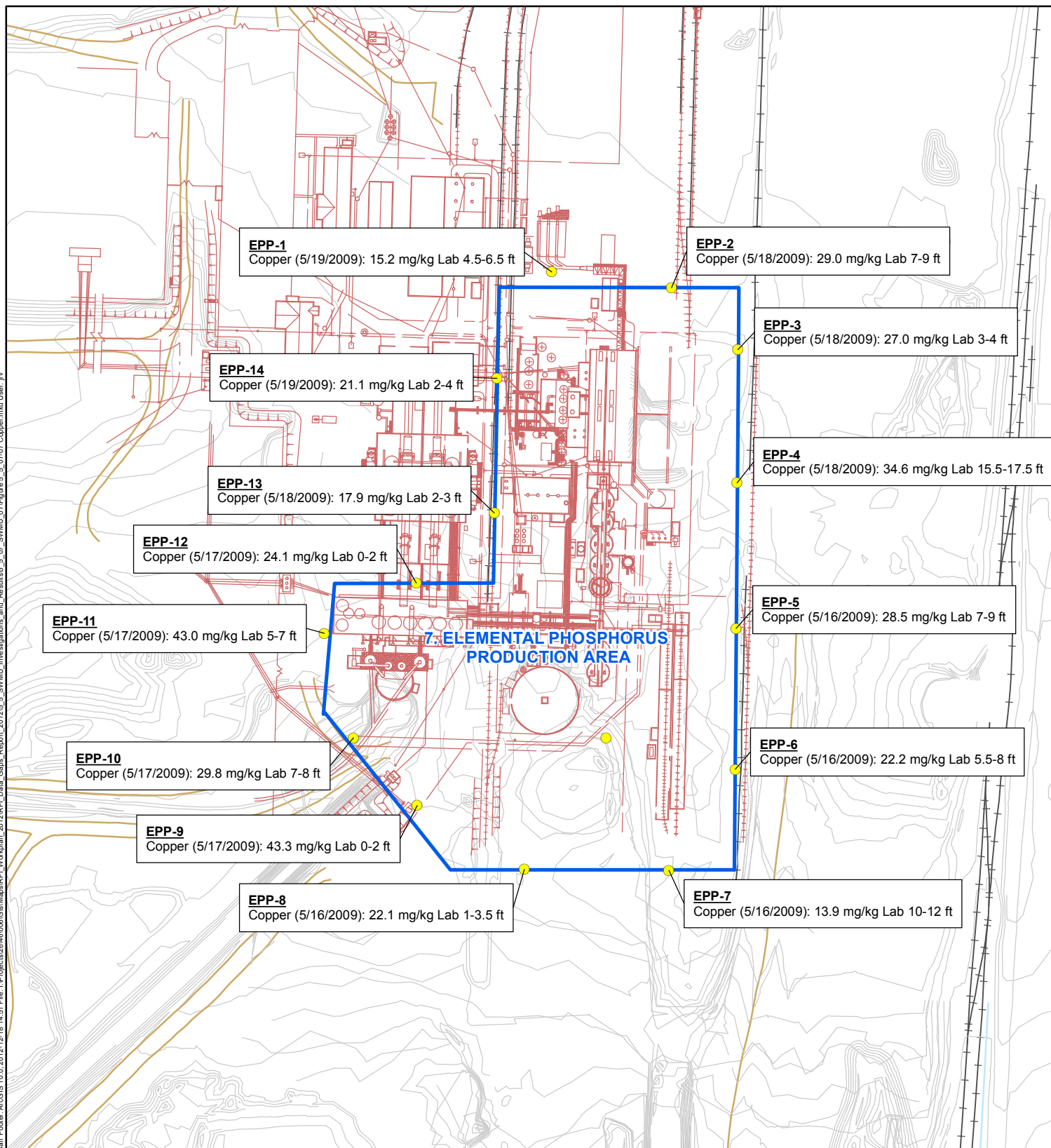
200 0 200  
Feet



Figure 5.5.7-6

**SWMU 7  
CHROMIUM  
Rhodia Silver Bow Plant  
Montana**

Bar Footer ArcGIS 10.0, 2012-12-18 14:51 File: I:\Project\2014\006\GIS\Map\REFI\_Workplan\_2012\FI\_Data\_Gaps\_Report\_2012\5\_SWMU\_Investigations\_and\_Results\_5\_of\_SWMU\_07\Figure 5.5.7-7 Copper.mxd User: jv



● Sample Location

■ SWMU 7

— Elevation Contour

— Drainage

— Railroad

— Road

— Former Plant Structures

**Bold font indicates that sample concentration is greater than the 95% UCL of mean Reference Area Concentration.**

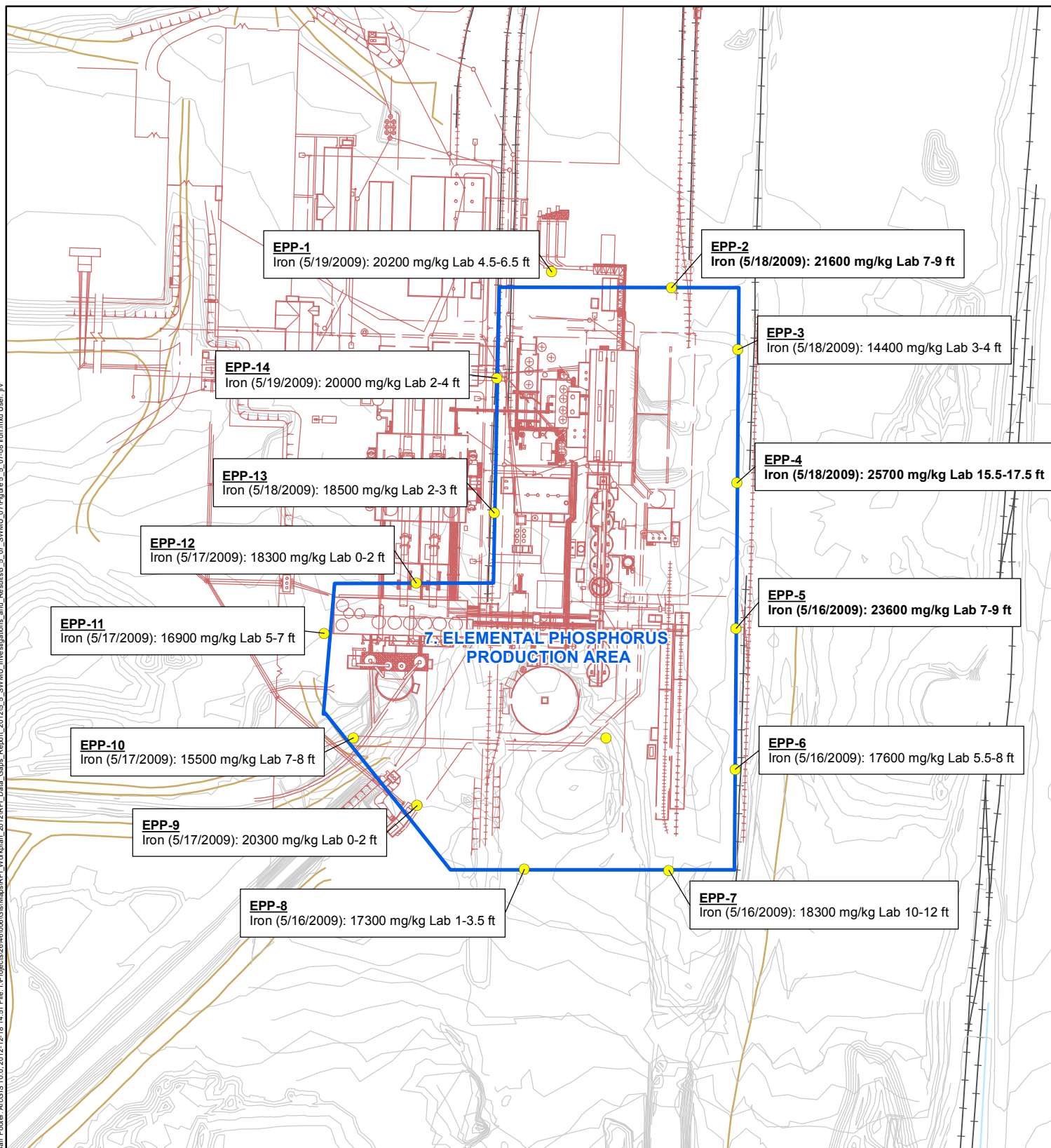
200 0 200  
Feet



Figure 5.5.7-7

SWMU 7  
COPPER  
Rhodia Silver Bow Plant  
Montana

Bar Footer ArcGIS 10.0, 2012-12-18 14:51 File: I:\Project\2014\006\GaMa\MapRF\Workplan\_2012\FI File: I:\Project\2014\006\GaMa\MapRF\Workplan\_2012\FI Figure 5.5.7-8 Iron.mxd User: jv



- Sample Location
- SWMU 7
- Elevation Contour
- Drainage
- Railroad
- Road
- Former Plant Structures

**Bold font indicates that sample concentration is greater than the 95% UCL of mean Reference Area Concentration.**

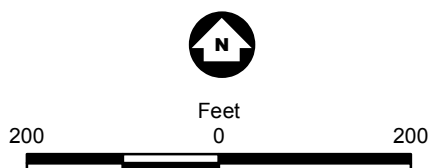
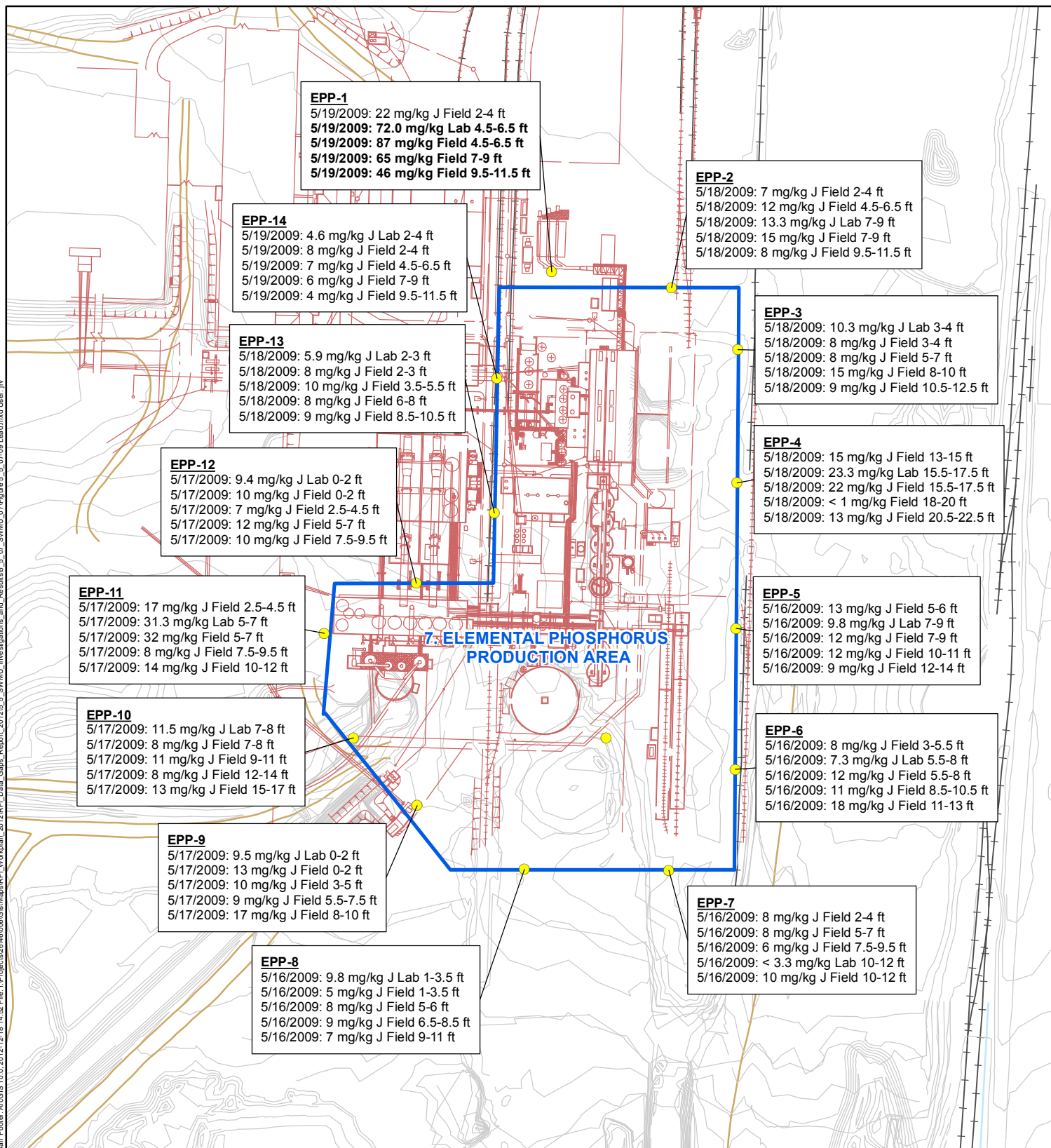


Figure 5.5.7-8

SWMU 7  
IRON  
Rhodia Silver Bow Plant  
Montana

Bar Footer ArcGIS 10.0, 2012-12-18 14:52 File: I:\Project\2014\006\GIS\MapInfo\Workplan\_2012\FI Data Gaps\_Report\_2012\5\_SWMU\_investigations\_and\_results\_5\_of\_SWMU\_07\Figure 5.5.7-9 Lead.mxd User: jrv



● Sample Location

SWMU 7

— Elevation Contour

— Drainage

— Railroad

— Road

— Former Plant Structures

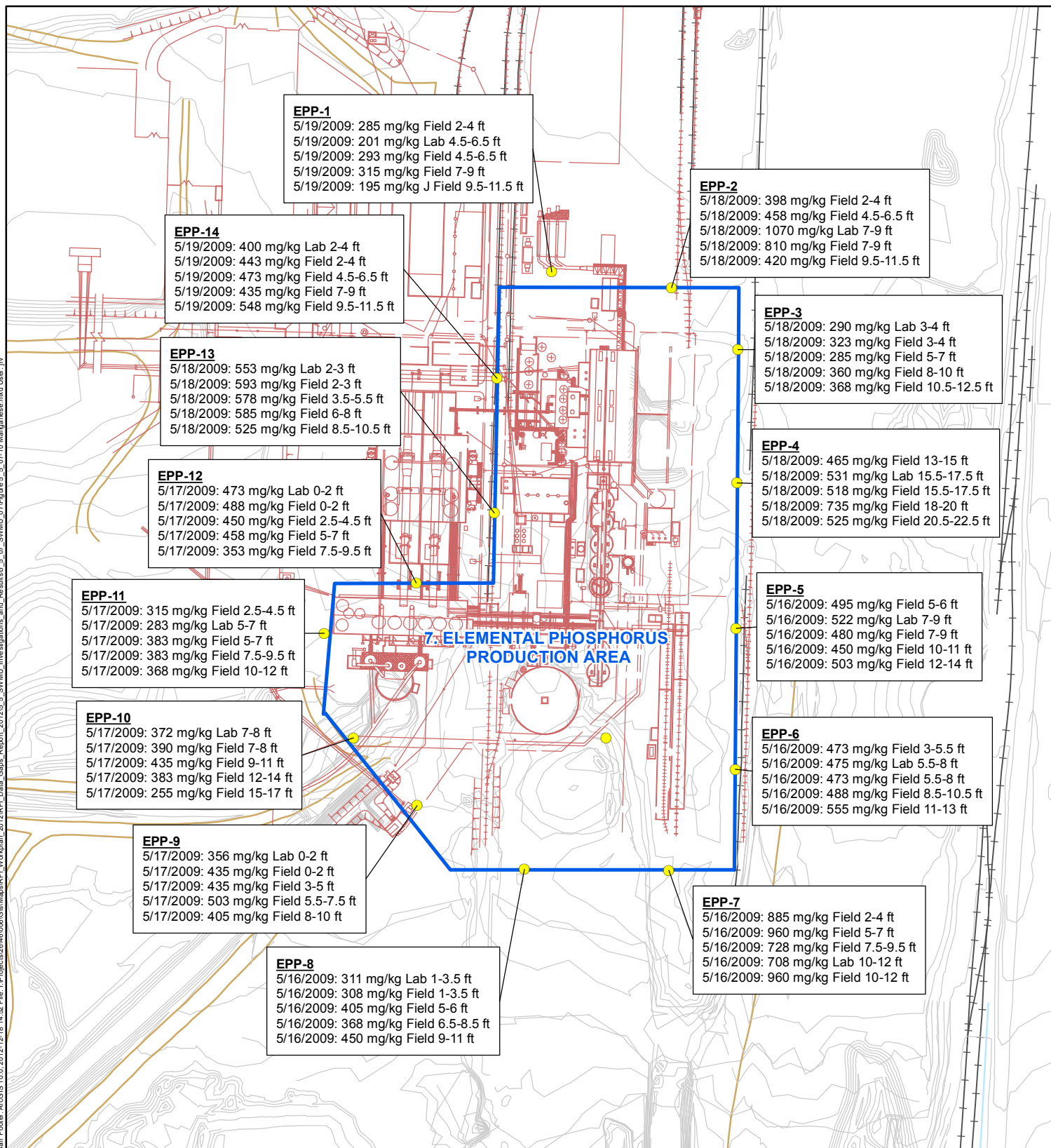
**Bold font indicates that sample concentration is greater than the 95% UCL of mean Reference Area Concentration.**

200 0 200  
Feet

Figure 5.5.7-9

**SWMU 7  
LEAD  
Rhodia Silver Bow Plant  
Montana**

Bar Footer ArcGIS 10.0, 2012-12-18 14:52 File: I:\Project\2014\006\GaMa\MapRFI\_Workplan\_2012\FI\_Data\_Gaps\_Report\_2012\5\_SWMU\_investigations\_and\_results\_5\_of\_SWMU\_07\Figure 5.5.7-10 Manganese.mxd User: jrv



● Sample Location

SWMU 7

— Elevation Contour

— Drainage

— Railroad

— Road

— Former Plant Structures

**Bold font indicates that sample concentration is greater than the 95% UCL of mean Reference Area Concentration.**

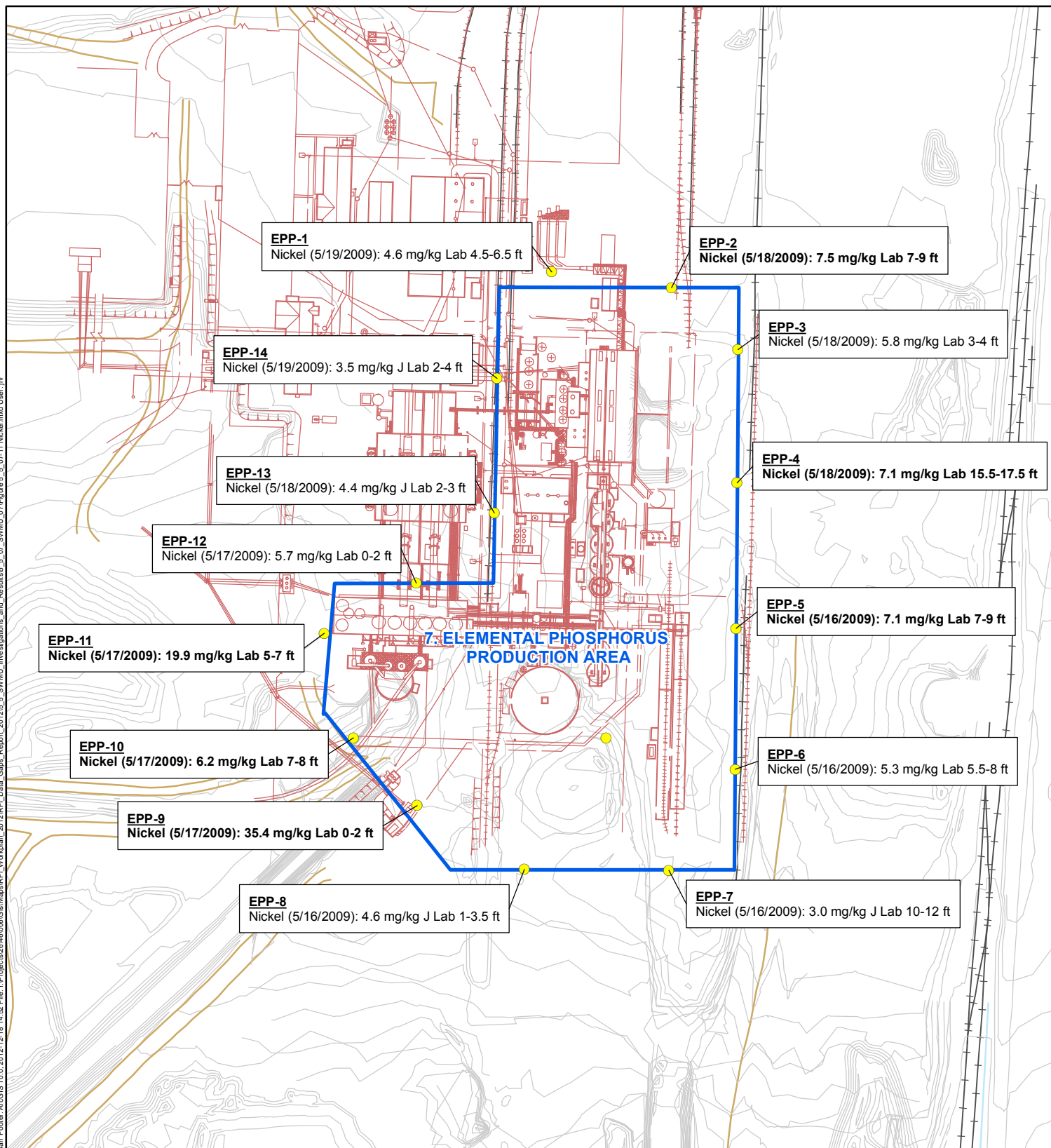
200 0 200  
Feet



Figure 5.5.7-10

**SWMU 7  
MANGANESE  
Rhodia Silver Bow Plant  
Montana**

Bar Footer ArcGIS 10.0, 2012-12-18 14:52 File: I:\Projects\2014\006\GaMa\MapRFI\_Workplan\_2012\5\_SWMU\_07\Figure 5.5.7-11 Nickel.mxd User: jw



- Sample Location
- SWMU 7
- Elevation Contour
- Drainage
- Railroad
- Road
- Former Plant Structures

**Bold font indicates that sample concentration is greater than the 95% UCL of mean Reference Area Concentration.**

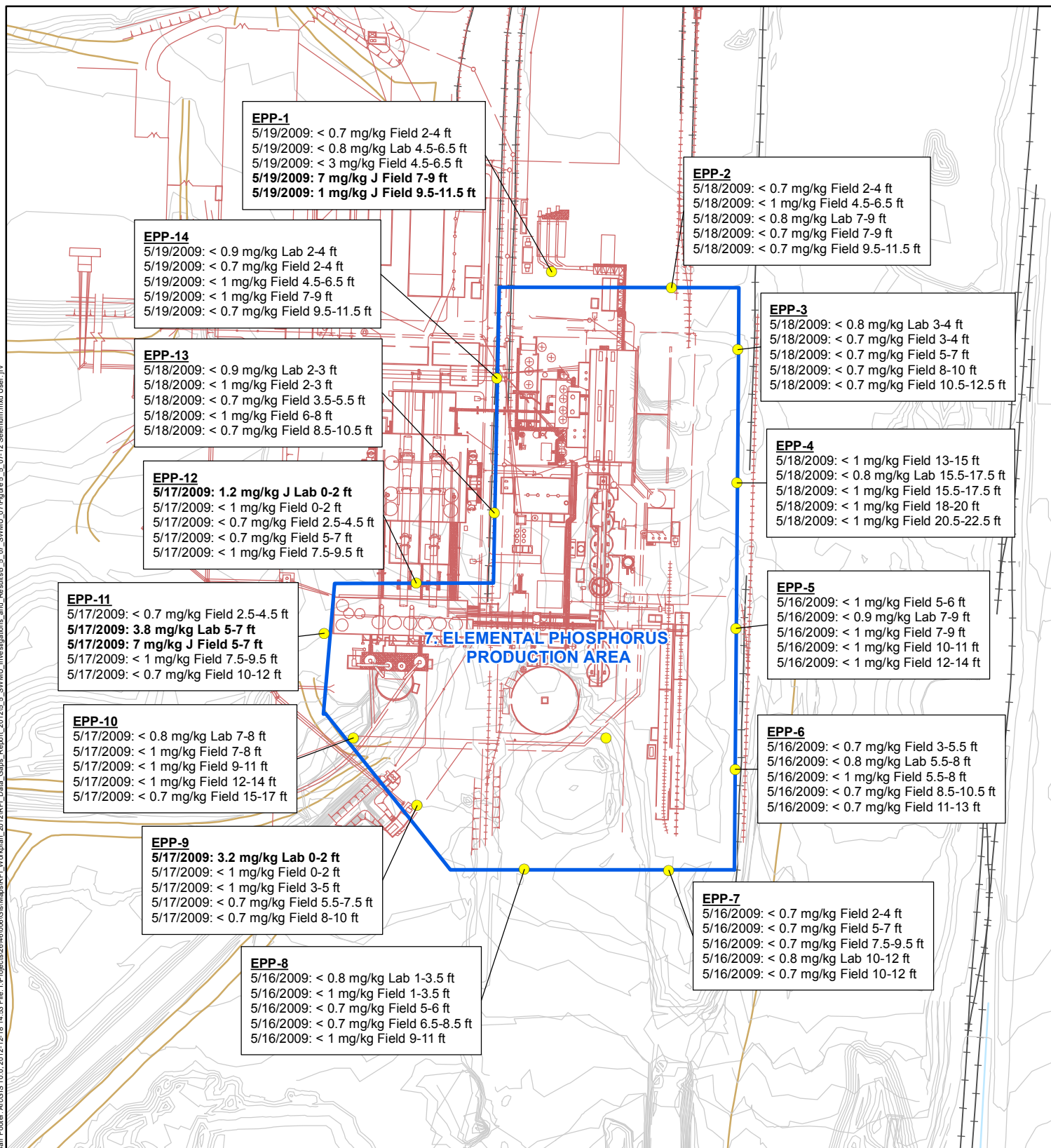
200 0 200  
Feet



Figure 5.5.7-11

**SWMU 7  
NICKEL  
Rhodia Silver Bow Plant  
Montana**

Bar Footer ArcGIS 10.0, 2012-12-18 14:53 File: I:\Project\2014\006\GIS\MapInfo\Workplan\_2012\FI\_Data\_Gaps\_Report\_2012\5\_SWMU\_Investigations\_and\_Results\_5\_of\_SWMU\_07\Figure 5.5.7-12 Selenium.mxd User: jrv



● Sample Location

□ SWMU 7

— Elevation Contour

— Drainage

— Railroad

— Road

— Former Plant Structures

**Bold font indicates that sample concentration is greater than the 95% UCL of mean Reference Area Concentration.**

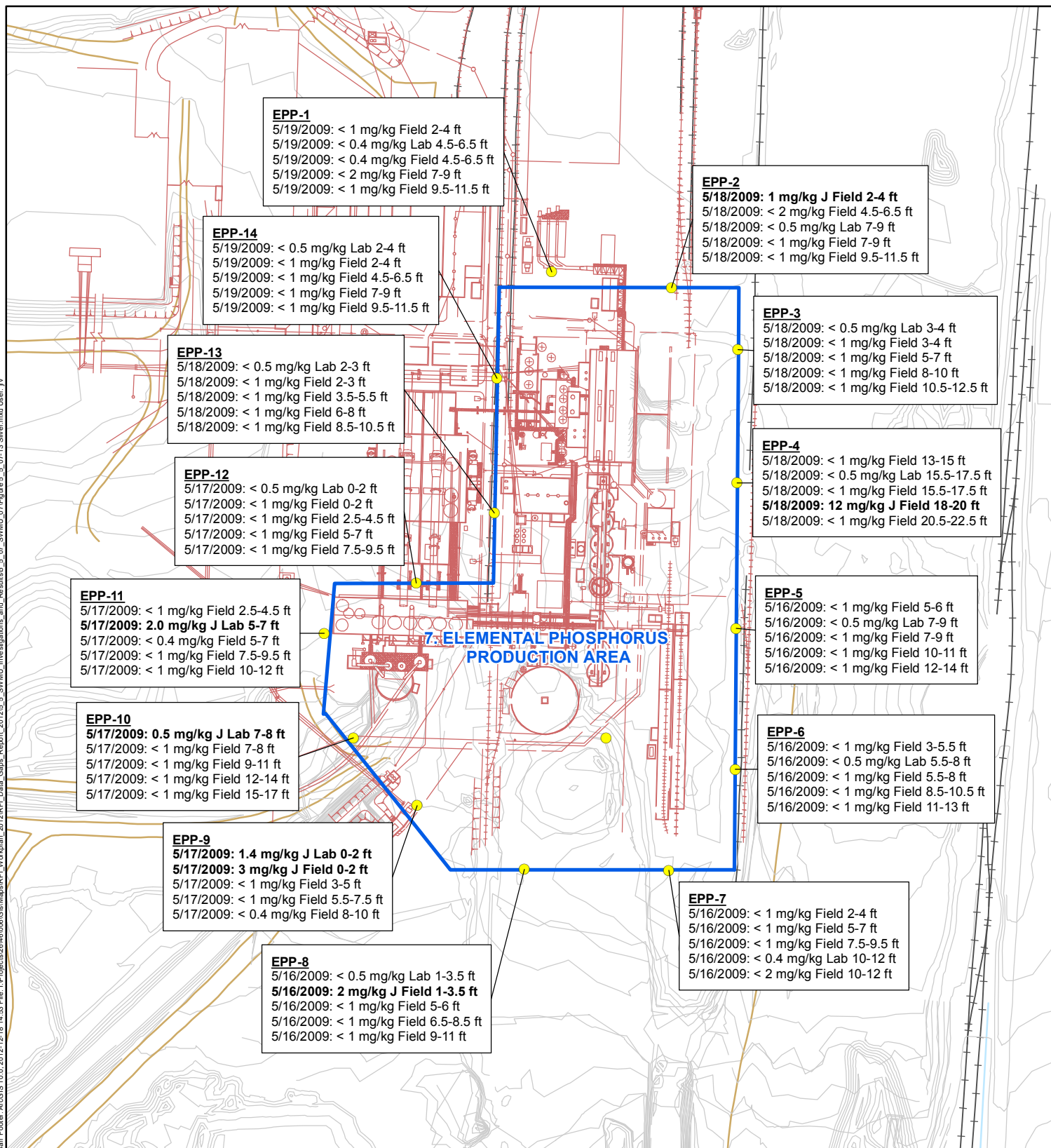
200 0 200  
Feet



Figure 5.5.7-12

**SWMU 7  
SELENIUM  
Rhodia Silver Bow Plant  
Montana**

Bar Footer ArcGIS 10.0, 2012-12-18 14:53 File: I:\Project\2014\006\GIS\MapInfo\Workplan\_2012\FI Data Gaps\_Report\_2012\5\_SWMU\_investigations\_and\_results\_5\_of\_SWMU\_07\Figure 5.5.7-13 Silver.mxd User: jv



● Sample Location

SWMU 7

— Elevation Contour

— Drainage

— Railroad

— Road

— Former Plant Structures

**Bold font indicates that sample concentration is greater than the 95% UCL of mean Reference Area Concentration.**

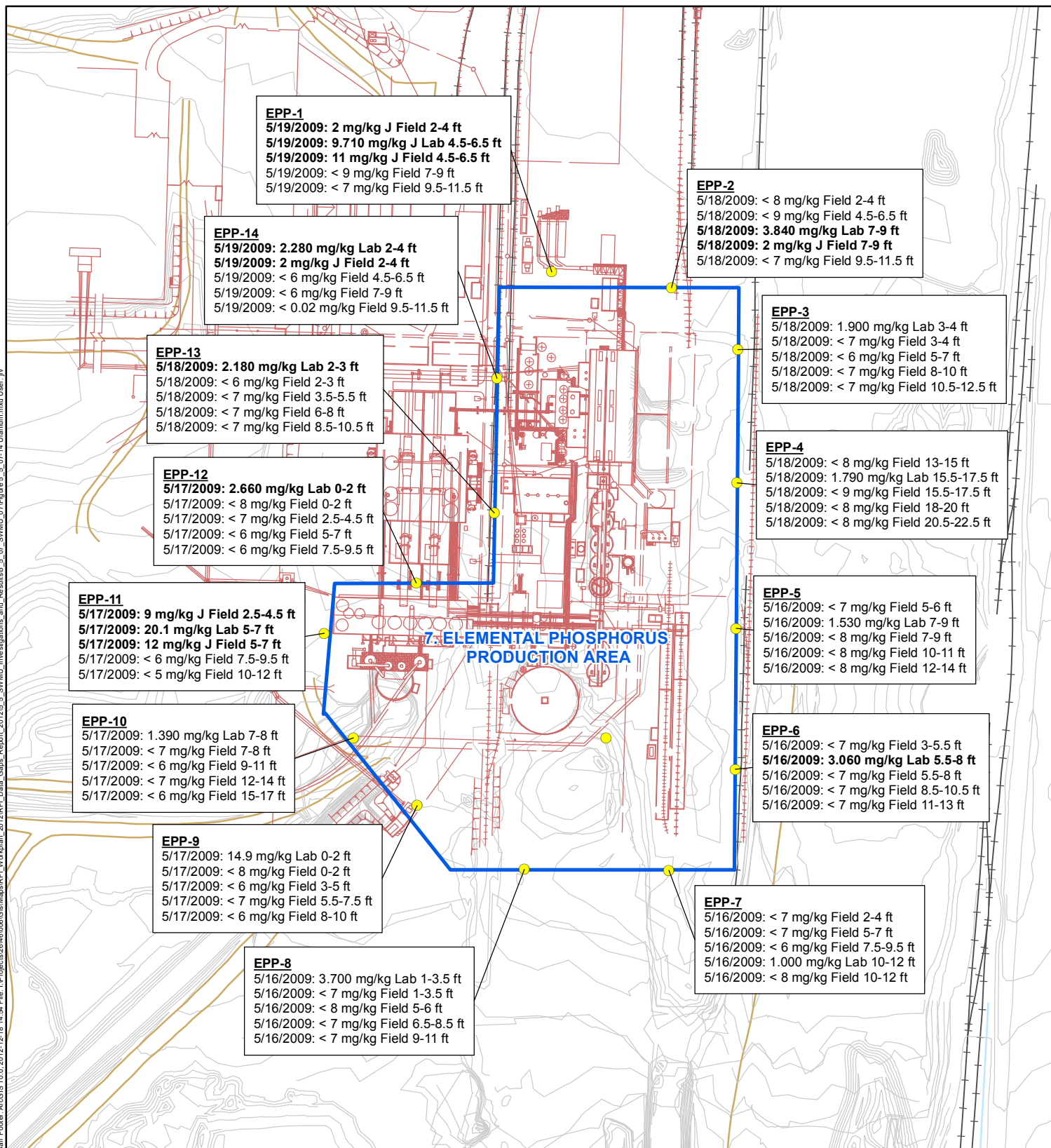
200 0 200  
Feet



Figure 5.5.7-13

SWMU 7  
SILVER  
Rhodia Silver Bow Plant  
Montana

Bar Footer ArcGIS 10.0, 2012-12-18 14:54 File: I:\Project\2014\006\GIS\MapInfo\Workplan\_2012\FI Data Gaps Report\_2012\5\_SWMU\_Investigations\_and\_Results\_5\_of\_SWMU\_07\Figure 5.5.7-14 Uranium.mxd User: jv



● Sample Location

SWMU 7

Elevation Contour

Drainage

Railroad

Road

Former Plant Structures

**Bold font indicates that sample concentration is greater than the 95% UCL of mean Reference Area Concentration.**

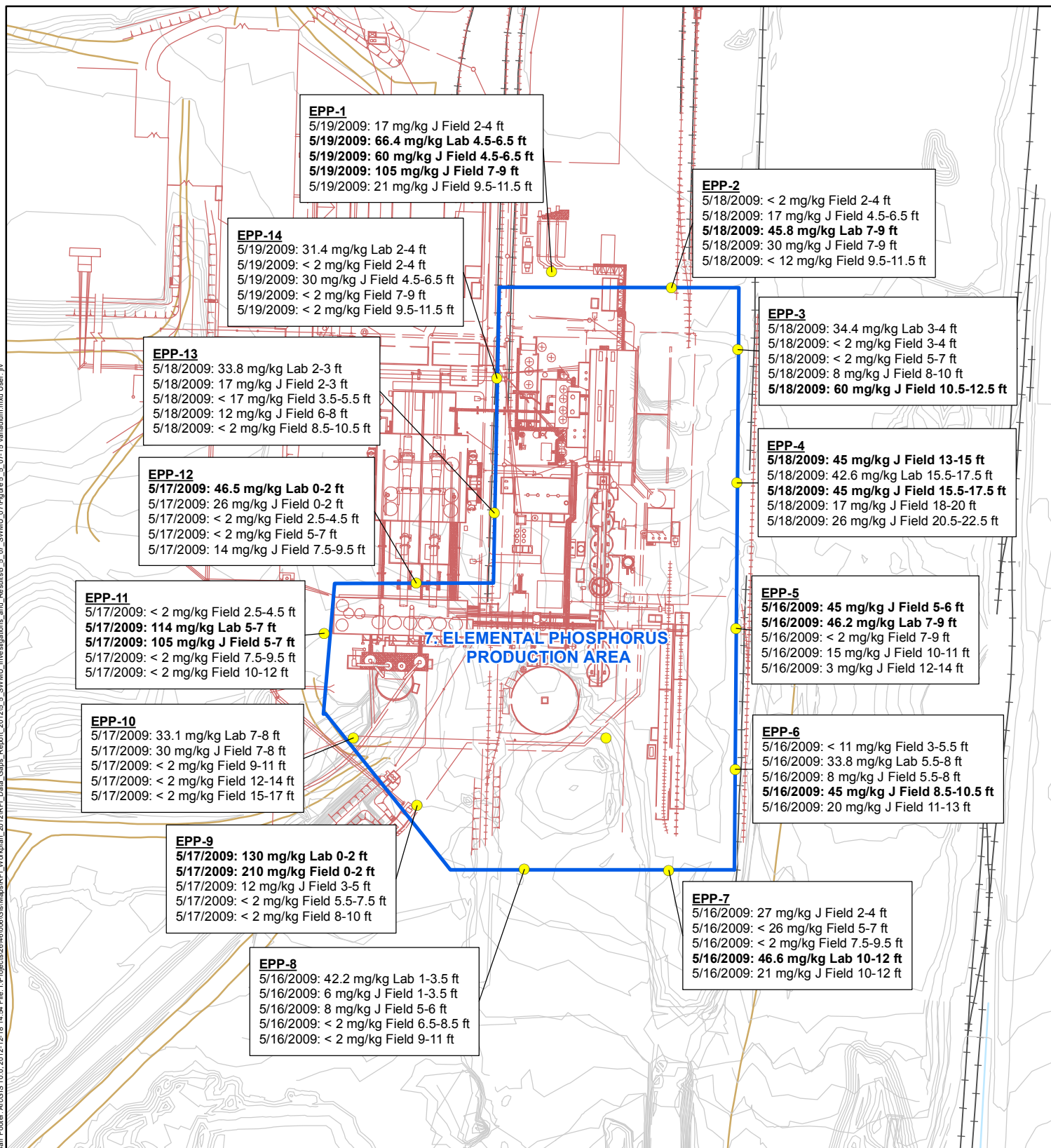
200 0 200  
Feet



Figure 5.5.7-14

SWMU 7  
URANIUM  
Rhodia Silver Bow Plant  
Montana

Bar Footer ArcGIS 10.0, 2012-12-18 14:54 File: I:\Project\2014\006\GAS\Map\REF\Workplan\_2012\Figure 5.5.7-15 Vanadium.mxd User: jv



● Sample Location

SWMU 7

— Elevation Contour

— Drainage

— Railroad

— Road

— Former Plant Structures

**Bold font indicates that sample concentration is greater than the 95% UCL of mean Reference Area Concentration.**

200 0 200  
Feet

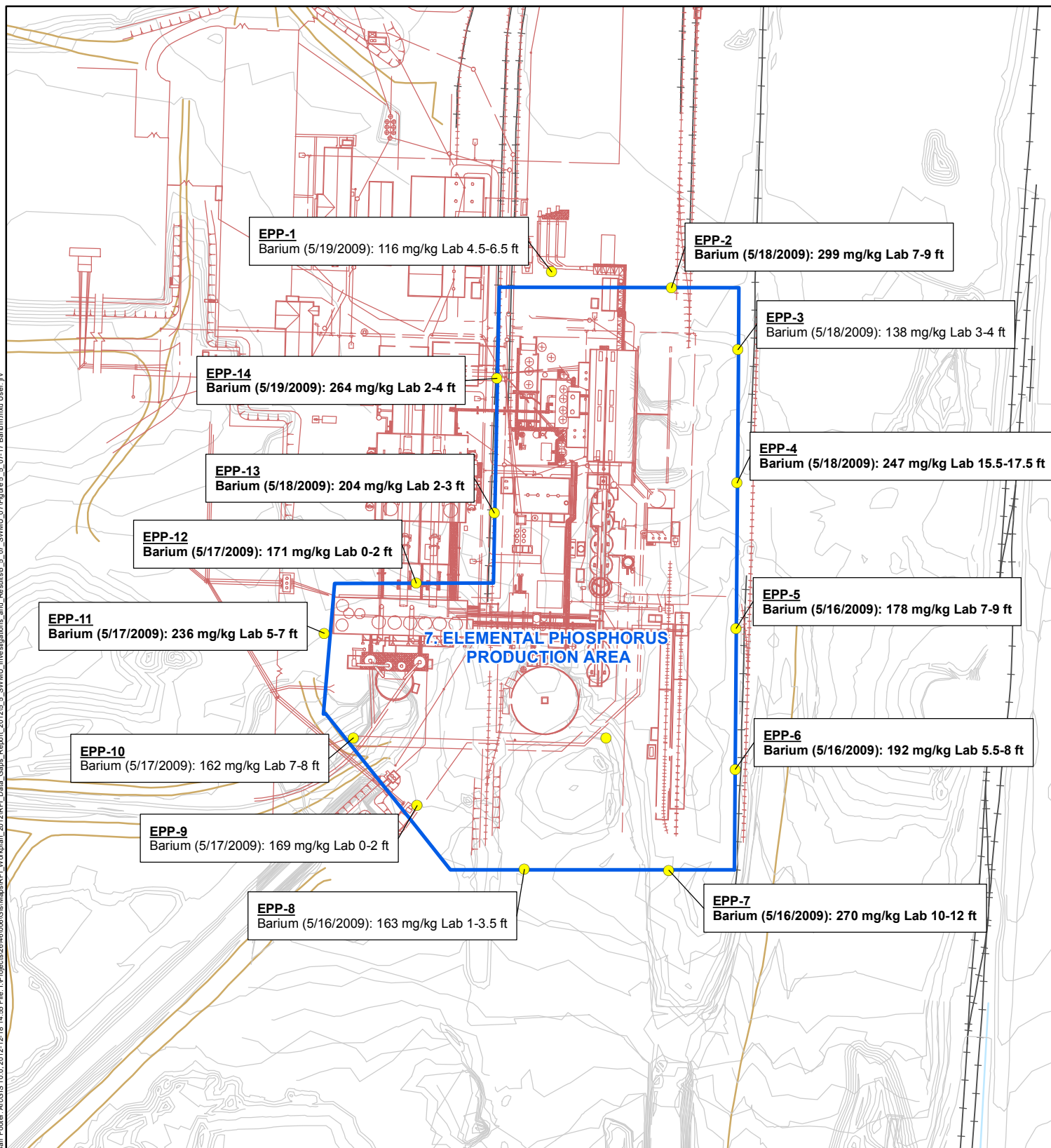


Figure 5.5.7-15

SWMU 7  
VANADIUM  
Rhodia Silver Bow Plant  
Montana



Bar Footer ArcGIS 10.0, 2012-12-18 14:55 File: I:\Project\2014\006\GaMa\MapRF\Workplan\_2012\FI Data Gaps Report 2012-5 SWMU Investigations and Results 5.07-17 Barium User.Fv



● Sample Location

□ SWMU 7

— Elevation Contour

— Drainage

— Railroad

— Road

— Former Plant Structures

**Bold font indicates that sample concentration is greater than the 95% UCL of mean Reference Area Concentration.**

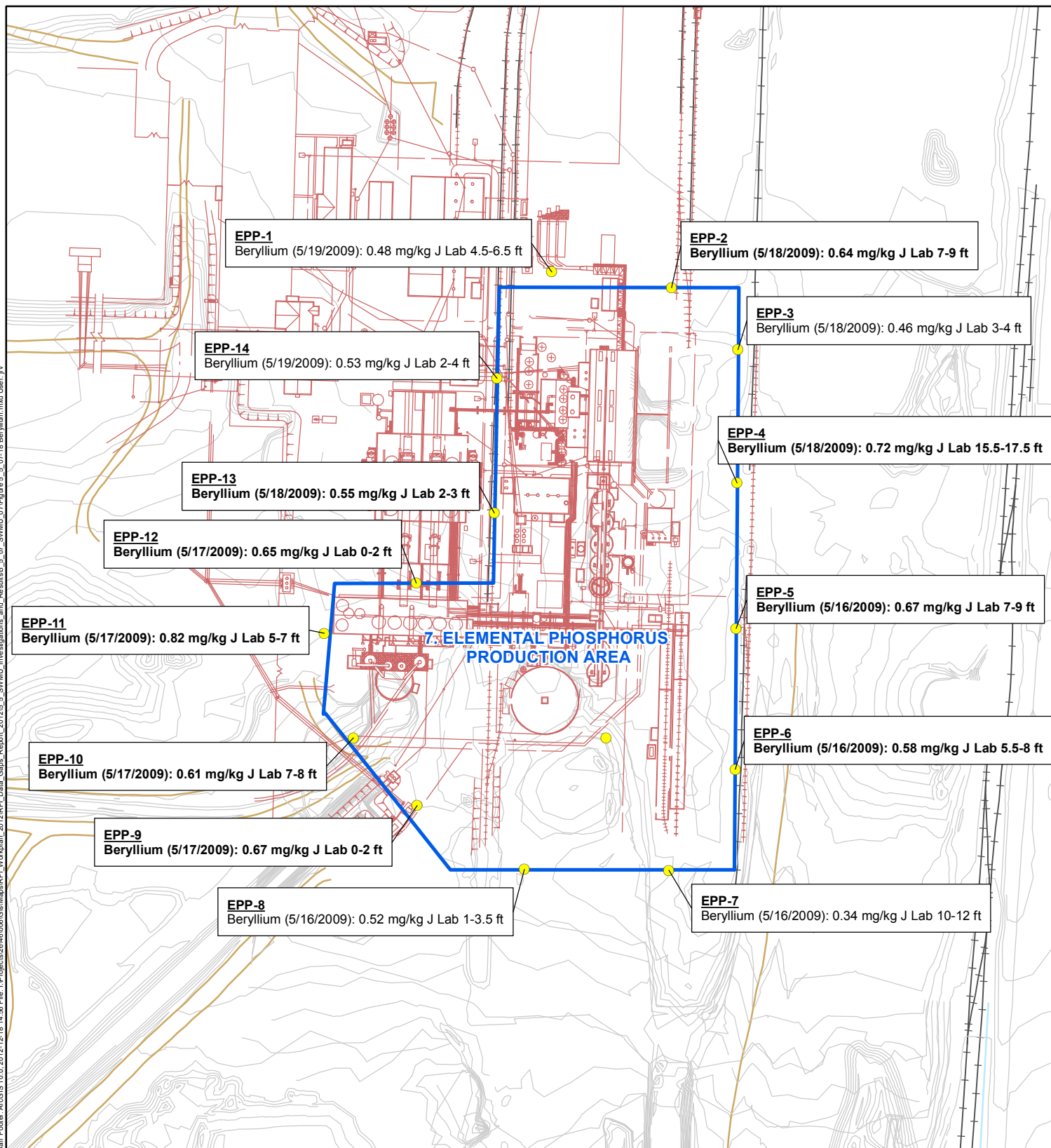
200 0 200  
Feet



Figure 5.5.7-17

SWMU 7  
BARIUM  
Rhodia Silver Bow Plant  
Montana

Bar Footer ArcGIS 10.0, 2012-12-18 14:58 File: I:\Project\2014\006\GaMa\Beryllium\Workplan\_2012\FI Data Gaps Report\_2012\5\_SWMU\_investigations\_and\_results\_5\_of\_5\Figure 5.5.7-18 Beryllium.mxd User: jv



● Sample Location

■ SWMU 7

— Elevation Contour

— Drainage

— Railroad

— Road

— Former Plant Structures

**Bold font indicates that sample concentration is greater than the 95% UCL of mean Reference Area Concentration.**

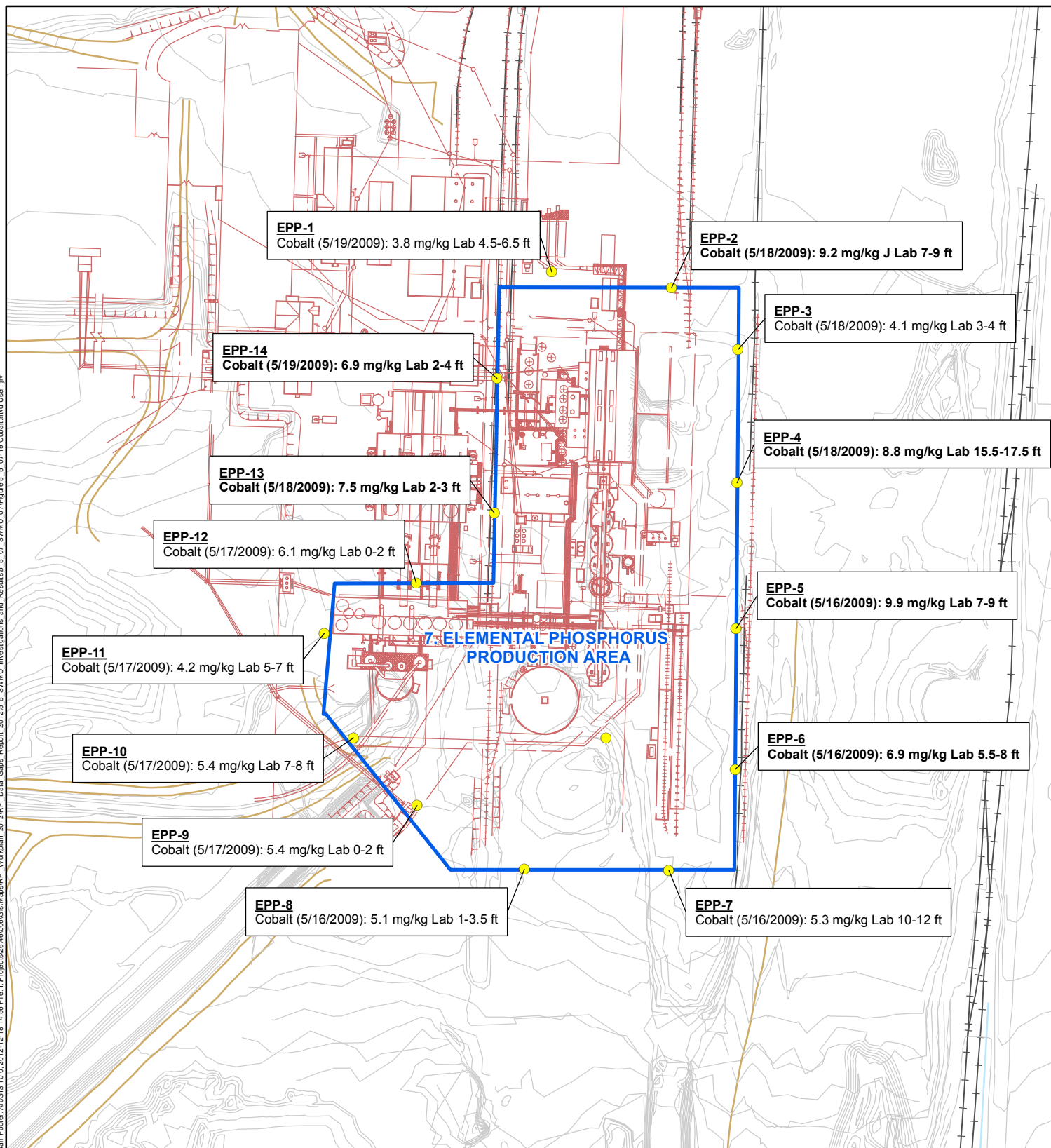
200 0 200  
Feet



Figure 5.5.7-18

**SWMU 7  
BERYLLIUM  
Rhodia Silver Bow Plant  
Montana**

B:\Foster ArcGIS 10.0, 2012-12-18 14:58 File: I:\Project\2014\006\Gis\MapInfo\Workplan\_2012\Figure 5.5.7-19 Cobalt.mxd User: jw



● Sample Location

□ SWMU 7

— Elevation Contour

— Drainage

— Railroad

— Road

— Former Plant Structures

**Bold font indicates that sample concentration is greater than the 95% UCL of mean Reference Area Concentration.**



Feet

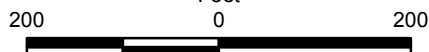
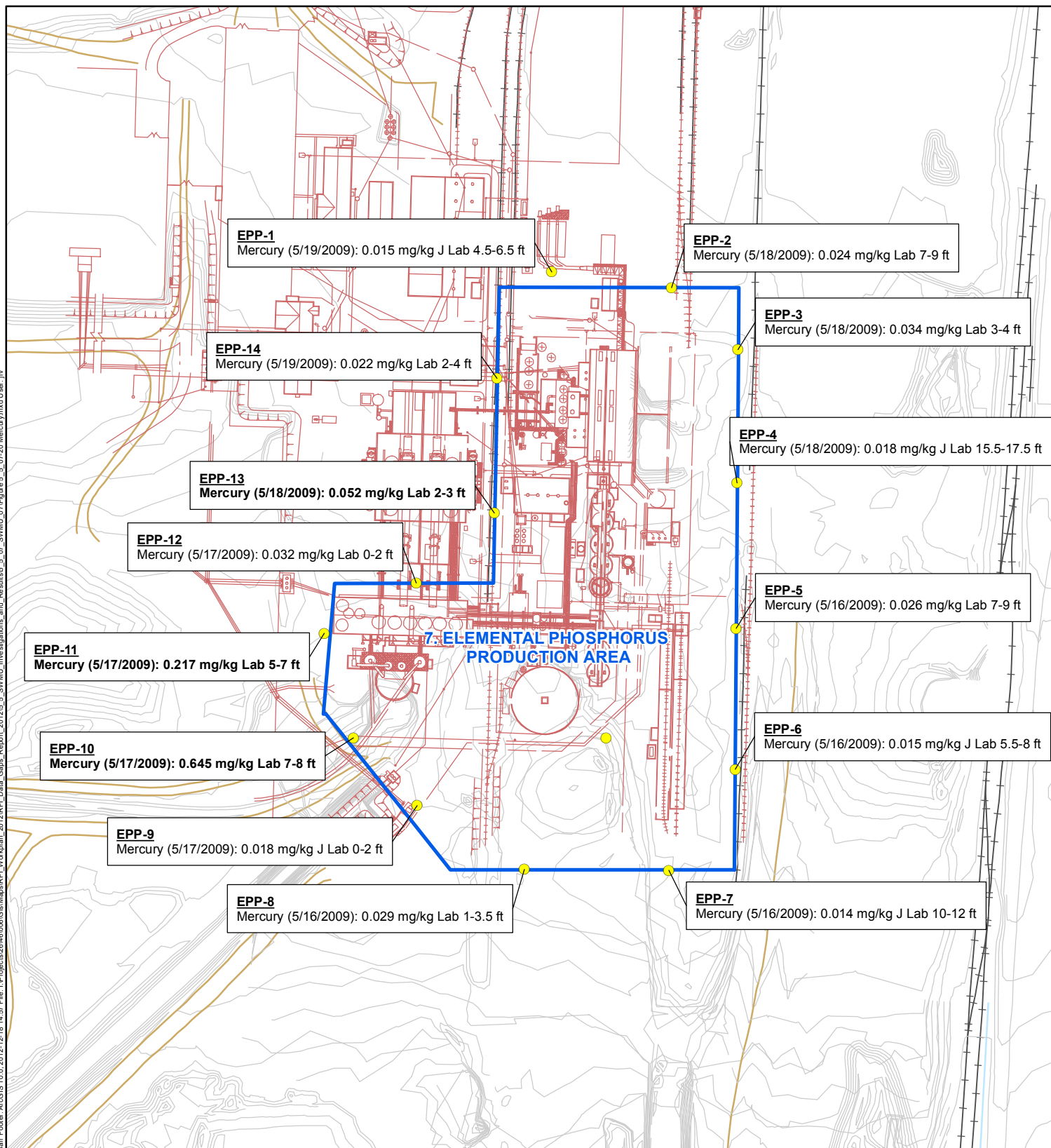


Figure 5.5.7-19

SWMU 7  
COBALT  
Rhodia Silver Bow Plant  
Montana

Bar Footer ArcGIS 10.0, 2012-12-18 14:57 File: I:\Project\2014\006\GaMa\MapRF\Workplan\_2012\FI Data Gaps\_Report\_2012\5\_SWMU\_investigations\_and\_results\_5\_of\_5\_SWMU\_07\Figure 5.5.7-20 Mercury.mxd User: jv



● Sample Location

□ SWMU 7

— Elevation Contour

— Drainage

— Railroad

— Road

— Former Plant Structures

**Bold font indicates that sample concentration is greater than the 95% UCL of mean Reference Area Concentration.**

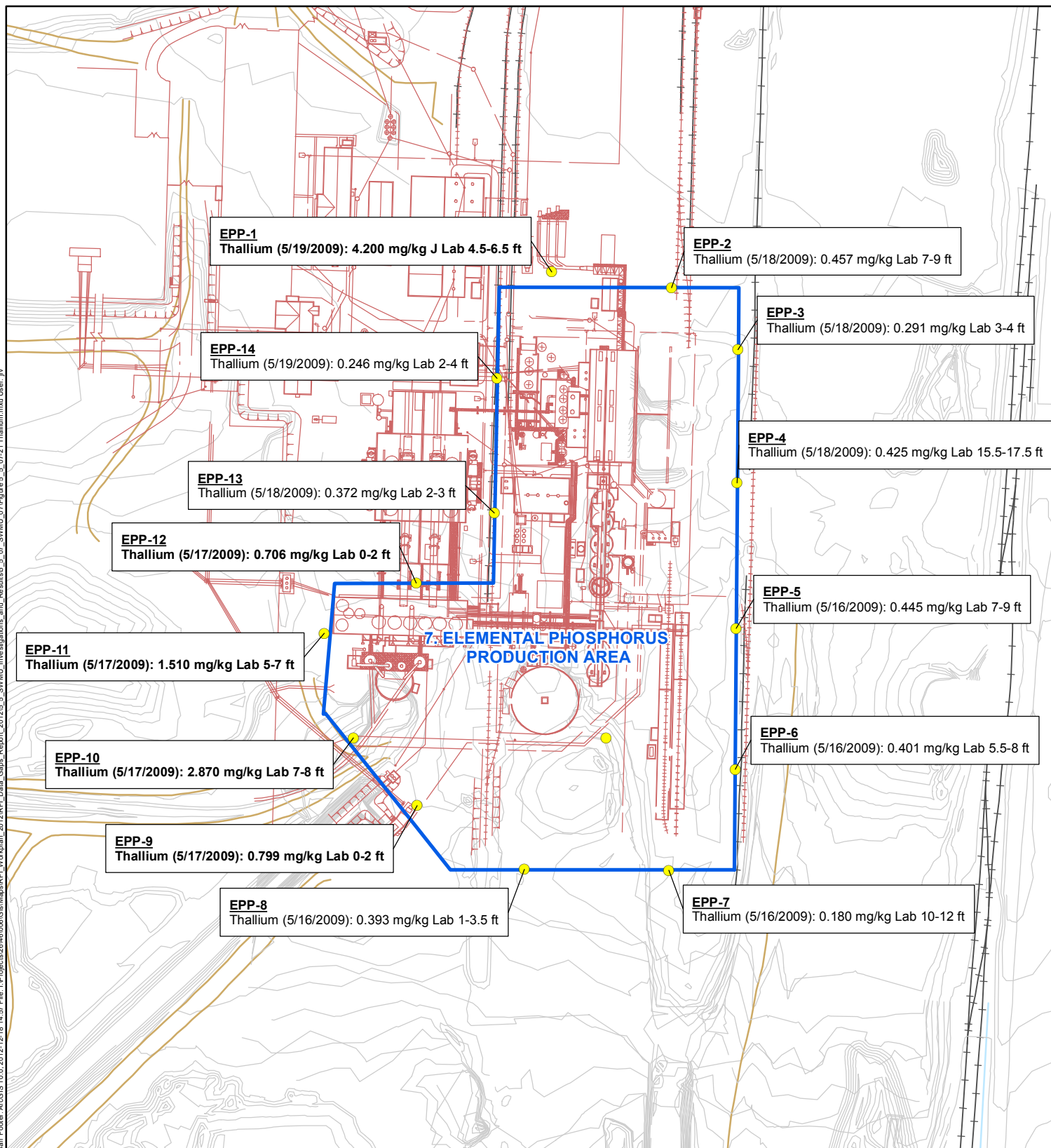
200 0 200  
Feet



Figure 5.5.7-20

**SWMU 7  
MERCURY  
Rhodia Silver Bow Plant  
Montana**

Bar Footer ArcGIS 10.0, 2012-12-18 14:57 File: I:\Project\2014\006\GaMa\MapRFI\_Workplan\_2012\FI Data Gaps\_Report\_2012\5\_SWMU\_07\Figure 5.5\_0721Thallium.mxd User: jv



● Sample Location

□ SWMU 7

— Elevation Contour

— Drainage

— Railroad

— Road

— Former Plant Structures

**Bold font indicates that sample concentration is greater than the 95% UCL of mean Reference Area Concentration.**

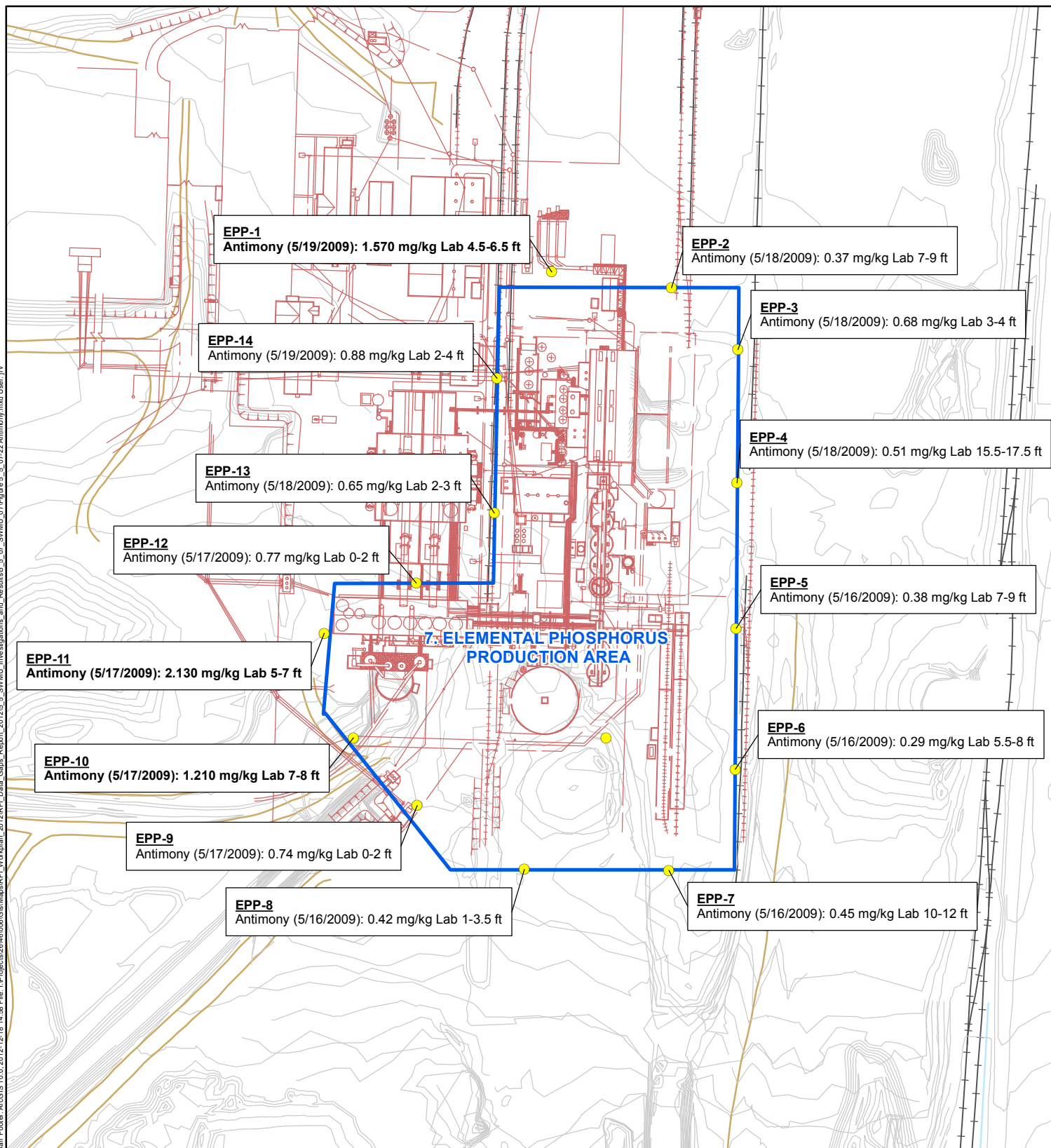
200 0 200  
Feet



Figure 5.5.7-21

**SWMU 7  
THALLIUM  
Rhodia Silver Bow Plant  
Montana**

Bar Footer ArcGIS 10.0, 2012-12-18 14:58 File: I:\Project\2014\006\GIS\Map\RFI\_1\Workplan\_2012\5\_SWMU\_07\Figure 5.5.0722Antimony.mxd User: jrv



● Sample Location

SWMU 7

— Elevation Contour

— Drainage

— Railroad

— Road

— Former Plant Structures

**Bold font indicates that sample concentration is greater than the 95% UCL of mean Reference Area Concentration.**

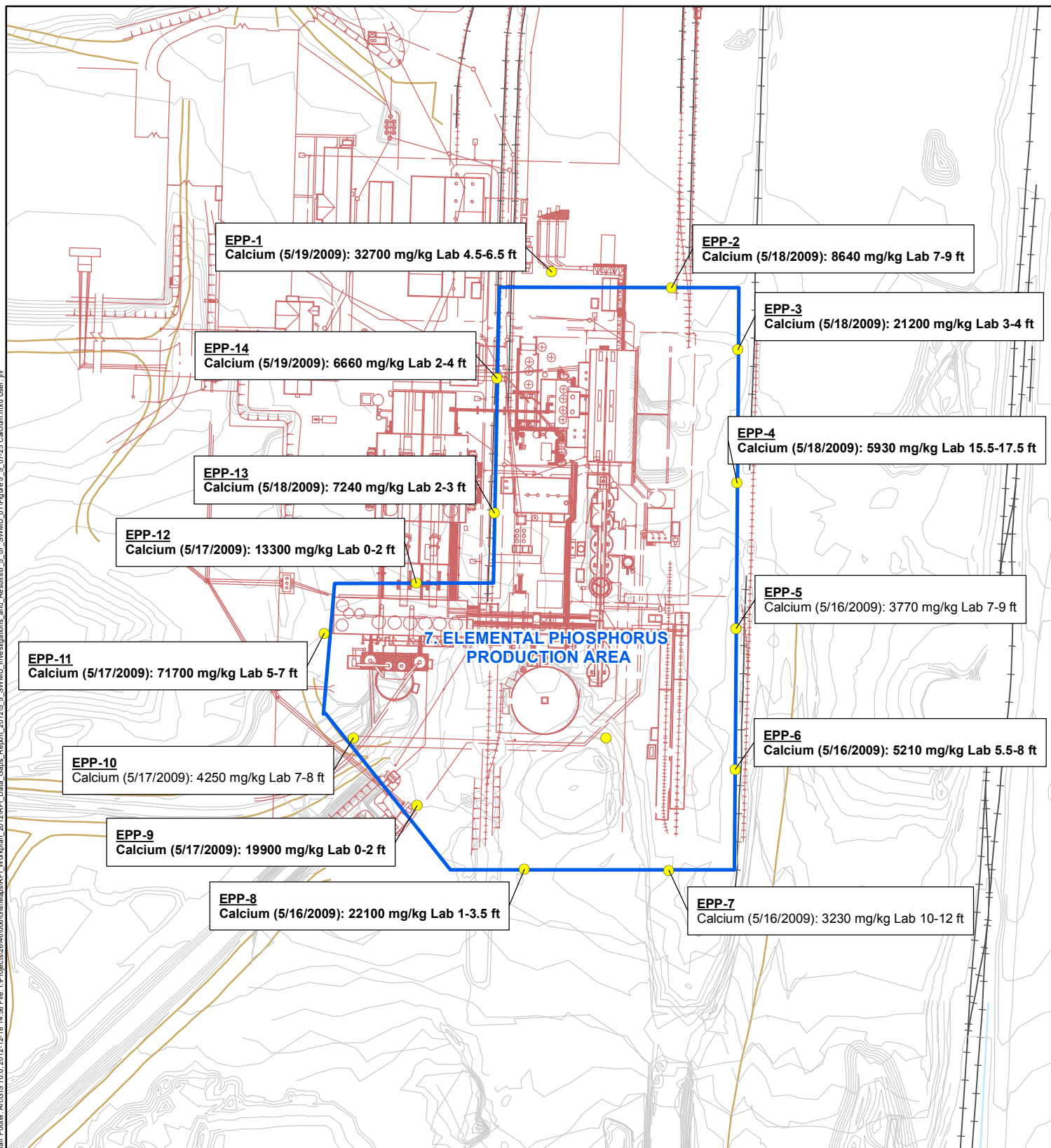
200 0 200  
Feet



Figure 5.5.7-22

**SWMU 7  
ANTIMONY  
Rhodia Silver Bow Plant  
Montana**

Bar Footer ArcGIS 10.0, 2012-12-18 14:58 File: I:\Project\2014\06\000\GIS\MapInfo\Workplan\_2012\FI Data Gaps Report\_2012\5\_SWMU\_07\Figure 5.5.0723 Calcium.mxd User: jv



● Sample Location

□ SWMU 7

— Elevation Contour

— Drainage

— Railroad

— Road

— Former Plant Structures

**Bold font indicates that sample concentration is greater than the 95% UCL of mean Reference Area Concentration.**

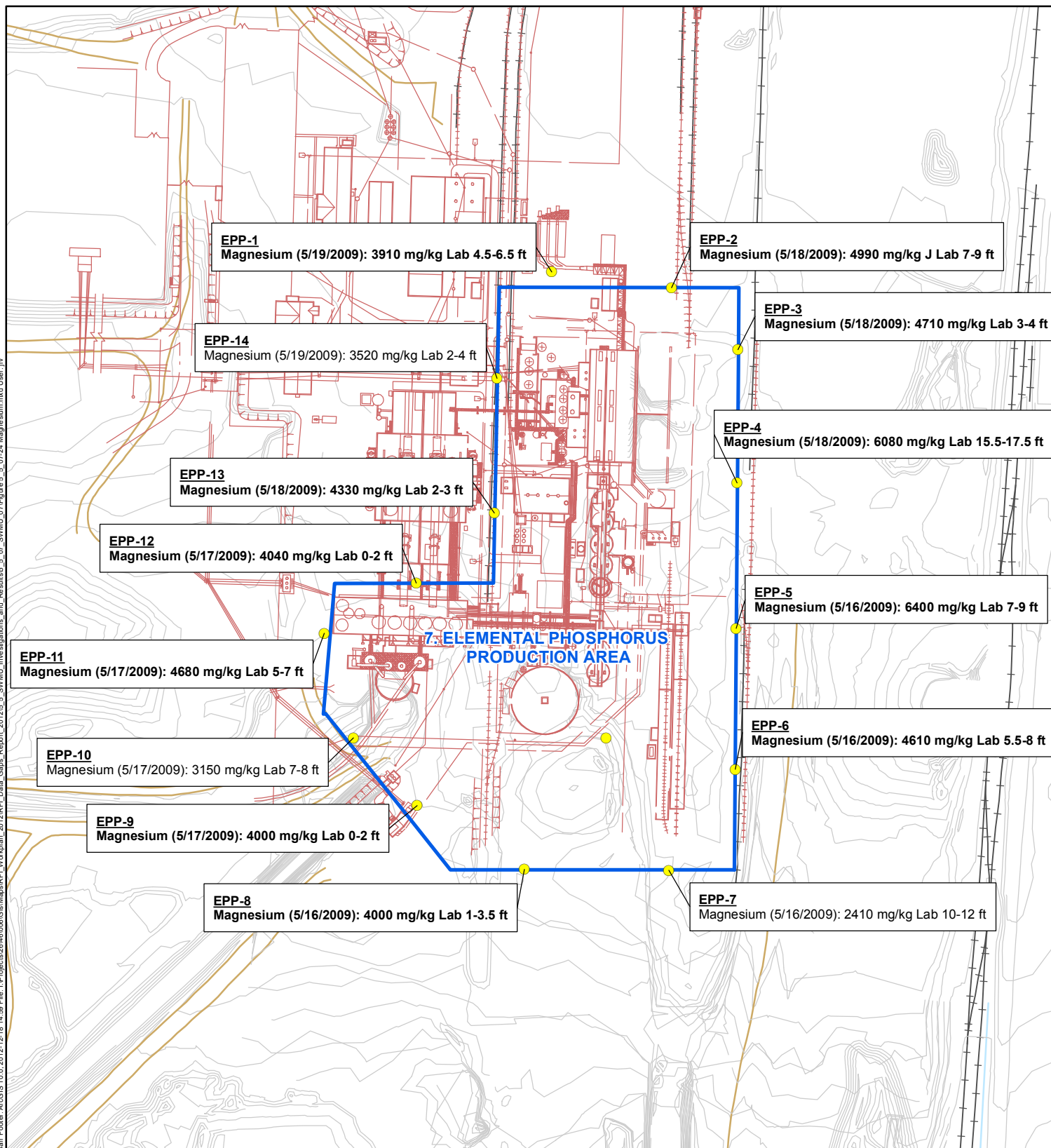
200 0 200  
Feet



Figure 5.5.7-23

**SWMU 7  
CALCIUM  
Rhodia Silver Bow Plant  
Montana**

Bar Footer ArcGIS 10.0, 2012-12-18 14:59 File: I:\Project\2014\006\GIS\Map\RFI\_Workplan\_2012\FI\_Data\_Gaps\_Report\_2012\5\_SWMU\_Investigations\_and\_Results\_5\_of\_5\_SWMU\_07\Figure 5.5.7-24 Magnesium.mxd User: jrv



● Sample Location

■ SWMU 7

— Elevation Contour

— Drainage

— Railroad

— Road

— Former Plant Structures

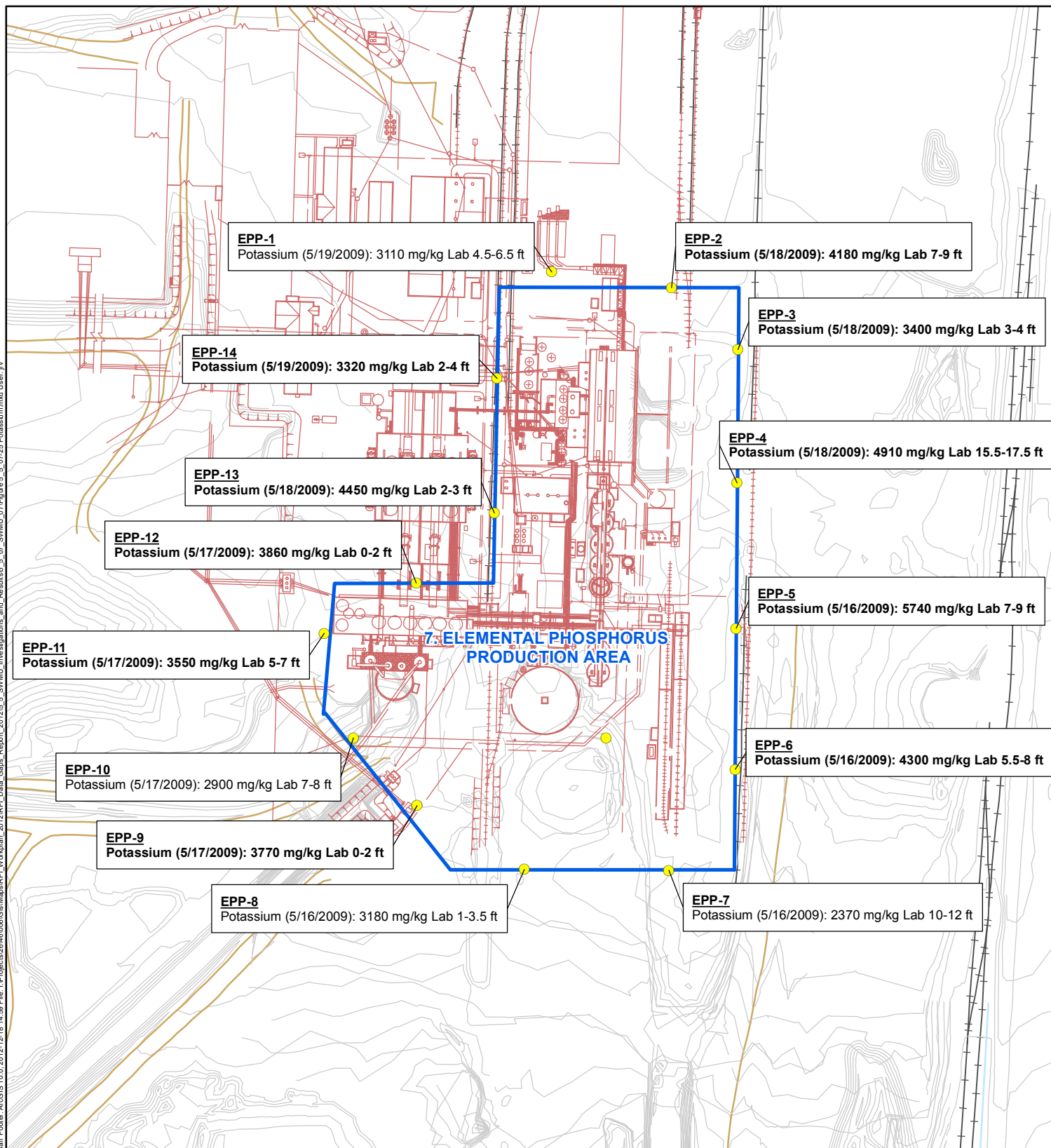
**Bold font indicates that sample concentration is greater than the 95% UCL of mean Reference Area Concentration.**

200 0 200  
Feet

Figure 5.5.7-24

SWMU 7  
MAGNESIUM  
Rhodia Silver Bow Plant  
Montana

Bar Footer ArcGIS 10.0, 2012-12-18 14:59 File: I:\Project\2014\006\GIS\Map\RFI\_Workplan\_2012\FI\_Data\_Gaps\_Report\_2012\5\_SWMU\_Investigations\_and\_Results\_5\_of\_SWMU\_07\Figure 5.5.7-25 Potassium User.Fv



● Sample Location

■ SWMU 7

— Elevation Contour

— Drainage

— Railroad

— Road

— Former Plant Structures

**Bold font indicates that sample concentration is greater than the 95% UCL of mean Reference Area Concentration.**

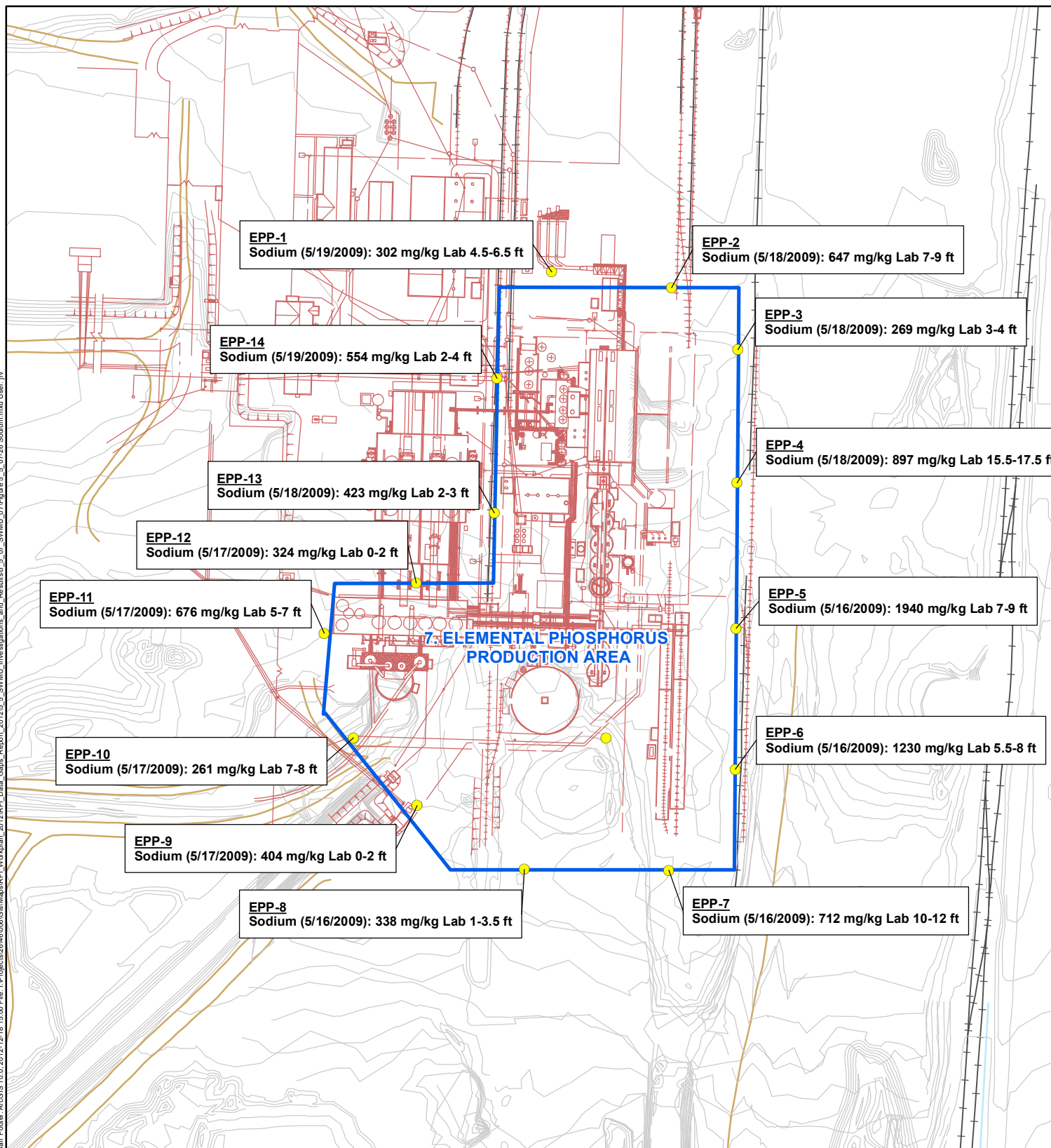
200 0 200  
Feet



Figure 5.5.7-25

SWMU 7  
POTASSIUM,  
Rhodia Silver Bow Plant  
Montana

Bar Footer ArcGIS 10.0, 2012-12-18 15:00 File: I:\Project\2014\006\GaMa\MapRF\Workplan\_2012\FI Data Gaps Report\_2012\5\_SWMU\_07\Figure 5.5.0726 Sodium.mxd User: jrv



● Sample Location

□ SWMU 7

— Elevation Contour

— Drainage

— Railroad

— Road

— Former Plant Structures

**Bold font indicates that sample concentration is greater than the 95% UCL of mean Reference Area Concentration.**

200 0 200  
Feet



Figure 5.5.7-26

SWMU 7  
SODIUM  
Rhodia Silver Bow Plant  
Montana

## **Appendices**

## **Appendix 5.5.7-A**

### **Boring Logs**

# LOG OF Boring EPP-1

SHEET 1 OF 1

Client Rhodia

Drill Contractor O'Keefe

Project Name Rhodia RFI

Drill Method HSA

Number 26/46-006

Drilling Started 5/19/09 Ended 5/19/09

Elevation --

Location Silver Bow, Montana

Logged By MMB/JLS4

Total Depth 11.5

| DEPTH<br>FEET | SAMP. LENGTH<br>& RECOVERY | SAMP. NUMBER | Blows/6 in.     | Discoloration-<br>Odor-<br>Sheen | Moisture | ASTM | LITHOLOGY | DESCRIPTION                                                                                                                                                                                                         | DEPTH<br>FEET |
|---------------|----------------------------|--------------|-----------------|----------------------------------|----------|------|-----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
| 0             |                            |              |                 |                                  |          |      |           | 0-2': Fill, gray coarse slag with some black coke fines.                                                                                                                                                            |               |
| 2             |                            | 1            | 9-9-9-<br>17    | None<br>None<br>None             | Dry      | FILL |           |                                                                                                                                                                                                                     |               |
| 4             |                            | 2            | 10-16-<br>22-61 | None<br>None<br>None             | Dry      | ML   |           | 2-5': Sandy silt, brownish yellow(10 yr 6/6), firm, non-plastic, sand is fine to medium-grained.<br><br>pH of soil in water : 6.98                                                                                  | 2             |
| 6             |                            | 3            | 22-55-<br>21-14 | None<br>None<br>None             | Dry      | FILL |           | 5-6': Fill, black coke fines mixed with gray coarse and granular slag.<br><br>pH of soil in water : 6.87                                                                                                            | 6             |
| 8             |                            | 4            | 9-14-<br>14-21  | None<br>None<br>None             | Dry      | SP   |           | 6-11.5': Silty fine to medium-grained sand, brownish yellow(10 yr 6/6), micaceous.<br><br>7-9': Sand with 15-20% gravel with reddish Fe-oxide staining surrounding gravel pieces.<br><br>pH of soil in water : 6.32 | 8             |
| 10            |                            | 5            | 15-24-<br>23-44 | None<br>None<br>None             | Dry      |      |           | pH of soil in water : 5.95                                                                                                                                                                                          | 10            |
| 12            |                            |              |                 |                                  |          |      |           | End of Boring - 11.5 feet                                                                                                                                                                                           | 12            |
| 14            |                            |              |                 |                                  |          |      |           |                                                                                                                                                                                                                     | 14            |



**Barr Engineering Co.**  
4700 West 77th Street, Suite 200  
Minneapolis, MN 55435-4803  
Telephone: (952) 832-2600  
Fax: (952) 832-2601

Remarks: Collected analytical soil samples at 2-4', 4.5-6.5', 7-9', 9.5-11.5' and composite sample 2-11.5'.  
pH of soil in water samples refrigerated until tests conducted on 5/27/09.

BGS = "below ground surface"  
Additional data may have been collected in the field which is not included on this log.

## LOG OF Boring EPP-2

SHEET 1 OF 1

Client RhodiaDrill Contractor O'KeefeProject Name Rhodia RFIDrill Method HSANumber 26/46-006Drilling Started 5/18/09 Ended 5/18/09Elevation --Location Silver Bow, MontanaLogged By MMB/JLS4Total Depth 11.5

| DEPTH<br>FEET | SAMP. LENGTH<br>& RECOVERY | SAMP. NUMBER | Blows/6 in.      | Discoloration-<br>Odor-<br>Sheen | Moisture | ASTM  | LITHOLOGY | DESCRIPTION                                                                                                                                 | DEPTH<br>FEET |
|---------------|----------------------------|--------------|------------------|----------------------------------|----------|-------|-----------|---------------------------------------------------------------------------------------------------------------------------------------------|---------------|
| 0             |                            |              |                  |                                  |          |       |           | 0-1.5': Fill, mix of granular slag and silica rock fragments, gray to dark brown.                                                           | 0             |
| 2             |                            | 1            | 14-42-<br>103-54 | None<br>None<br>None             | Dry      | FILL  |           | 1.5-2': Gray granular and coarse slag.                                                                                                      | 2             |
| 4             |                            | 2            | 9-16-<br>25-36   | None<br>None<br>None             | Dry      | SP-SM |           | 2-6.5': Sand with silt, brownish yellow(10 yr 6/6), several very coarse-grained sand lenses, ~0.5" thick.<br><br>pH of soil in water : 7.04 | 4             |
| 6             |                            | 3            | 13-32-<br>43-52  | None<br>None<br>None             | Dry      |       |           | pH of soil in water : 7.84                                                                                                                  | 6             |
| 8             |                            | 4            | 21-32-<br>25-26  | None<br>None<br>None             | Dry      | ML    |           | 7-11.5': Silt with sand, brownish yellow(10 yr 6/6).<br>(contact with sand with silt above estimated)<br><br>pH of soil in water : 7.70     | 8             |
| 10            |                            | 5            | 13-21-<br>27-37  | None<br>None<br>None             | Dry      |       |           | pH of soil in water : 7.80                                                                                                                  | 10            |
| 12            |                            |              |                  |                                  |          |       |           | End of Boring - 11.5 feet                                                                                                                   | 12            |
| 14            |                            |              |                  |                                  |          |       |           |                                                                                                                                             | 14            |



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Minneapolis, MN 55435-4803  
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Fax: (952) 832-2601

Remarks: Collected analytical soil samples at 2-4', 4.5-6.5', 7-9', 9.5-11.5' and composite sample 2-11.5'.  
pH of soil in water samples refrigerated until tests conducted on 5/27/09.

BGS = "below ground surface"  
Additional data may have been collected in the field which is not included on this log.

# LOG OF Boring EPP-3

SHEET 1 OF 1

Client Rhodia

Drill Contractor O'Keefe

Project Name Rhodia RFI

Drill Method HSA

Number 26/46-006

Drilling Started 5/18/09 Ended 5/18/09

Elevation --

Location Silver Bow, Montana

Logged By MMB/JLS4

Total Depth 12.5

| DEPTH<br>FEET | SAMP. LENGTH<br>& RECOVERY | SAMP. NUMBER | Blows/6 in.     | Discoloration-<br>Odor-<br>Sheen | Moisture | ASTM     | LITHOLOGY | DESCRIPTION                                                                                                                                                          | DEPTH<br>FEET |
|---------------|----------------------------|--------------|-----------------|----------------------------------|----------|----------|-----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
| 0             |                            |              |                 |                                  |          |          |           | 0-3': Fill, mix of granular slag and silica rock fragments, gray to dark brown.                                                                                      | 0             |
| 2             |                            | 1            | 20-26-<br>22-45 | None<br>None<br>None             | Dry      | FILL     |           |                                                                                                                                                                      | 2             |
| 4             |                            | 2            | 29-22-<br>24-24 | None<br>None<br>None             | Dry      |          |           | 3-8': Silt with sand or sand with silt, brownish yellow to brown(10 yr 6/6), color lighter with depth, sand is fine to medium-grained.<br>pH of soil in water : 7.40 | 4             |
| 6             |                            | 3            | 14-18-<br>24-35 | None<br>None<br>None             | Dry      | ML/SP-SM |           | pH of soil in water : 7.50                                                                                                                                           | 6             |
| 8             |                            | 4            | 16-17-<br>17-19 | None<br>None<br>None             | Dry      |          |           | 8-12.5': Sandy silt, brownish yellow(10 yr 6/6), sand is fine-grained, micaceous.<br>pH of soil in water : 8.17                                                      | 8             |
| 10            |                            |              |                 |                                  |          | ML       |           |                                                                                                                                                                      | 10            |
| 12            |                            | 5            | 12-14-<br>17-26 | None<br>None<br>None             | Dry      |          |           | pH of soil in water : 7.83                                                                                                                                           | 12            |
| 14            |                            |              |                 |                                  |          |          |           | End of Boring - 12.5 feet                                                                                                                                            | 14            |



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4700 West 77th Street, Suite 200  
Minneapolis, MN 55435-4803  
Telephone: (952) 832-2600  
Fax: (952) 832-2601

Remarks: Collected analytical soil samples at 3-4', 5-7', 8-10', 10.5-12.5' and collected composite sample 3-12.5'.  
pH of soil in water samples refrigerated until tests conducted on 5/27/09.

BGS = "below ground surface"  
Additional data may have been collected in the field which is not included on this log.

# LOG OF Boring EPP-4

SHEET 1 OF 1

Client Rhodia

Drill Contractor O'Keefe

Project Name Rhodia RFI

Drill Method HSA

Number 26/46-006

Drilling Started 5/14/09 Ended 5/14/09

Elevation --

Location Silver Bow, Montana

Logged By MMB/JLS4

Total Depth 22.5

| DEPTH<br>FEET | SAMP. LENGTH<br>& RECOVERY | SAMP. NUMBER | Blows/6 in.     | Discoloration-<br>Odor-<br>Sheen | Moisture | ASTM  | LITHOLOGY | DESCRIPTION                                                                                                       | DEPTH<br>FEET |
|---------------|----------------------------|--------------|-----------------|----------------------------------|----------|-------|-----------|-------------------------------------------------------------------------------------------------------------------|---------------|
|               |                            |              |                 |                                  | Moist    | FILL  |           | 0-0.7': Silica rock.                                                                                              |               |
|               |                            | 1            | 17-33-<br>59-49 | None<br>None<br>None             | Dry      |       |           |                                                                                                                   |               |
|               |                            | 2            | 16-14-<br>17-12 | None<br>None<br>None             | Dry      |       |           |                                                                                                                   |               |
| 5             |                            | 3            | 12-14-<br>12-13 | None<br>None<br>None             | Dry      |       |           |                                                                                                                   | 5             |
|               |                            | 4            | 12-9-5-<br>4    | None<br>None<br>None             | Dry      | FILL  |           |                                                                                                                   |               |
| 10            |                            | 5            | 7-6-6-6         |                                  | Dry      |       |           |                                                                                                                   | 10            |
|               |                            | 6            | 11-16-<br>14-18 | None<br>None<br>None             | Dry      | ML    |           | 13-14': Silt with 10-15% fine-grained sand, brown(10 yr 5/3), dense, laminated with silty sand lenses, micaceous. |               |
| 15            |                            | 7            | 11-12-<br>26-32 | None<br>None<br>None             | Dry      | ML-SM |           | 14-16': Laminated silt and silty sand, yellowish brown(10 yr 5/6) 14-16'.                                         | 15            |
|               |                            | 8            | 13-22-<br>26-35 | None<br>None<br>None             | Dry      | ML    |           | 16-18': Silt with 10-15% fine-grained sand, brown(10yr 5/3).                                                      |               |
| 20            |                            | 9            | 14-16-<br>29-39 | None<br>None<br>None             | Dry      | SP    |           | 18-19': Sand, fine to medium-grained, grayish brown, sharp contact with above and below.                          |               |
|               |                            |              |                 |                                  |          | ML    |           | 19-21': Silt, thinly bedded to laminated, with 2-3" thick fine-coarse-grained sand interbeds.                     | 20            |
|               |                            |              |                 |                                  |          | SM    |           | 21-22.5': Silty sand, fine to medium-grained, thinly bedded to laminated, yellowish brown, micaceous.             |               |
|               |                            |              |                 |                                  |          |       |           | End of Boring - 22.5 feet                                                                                         |               |



Barr Engineering Co.  
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Remarks: Collected analytical soil samples at 13-15', 15.5-17.5', 18-20', 20.5-22.5', and composite sample 13-22.5'.

BGS = "below ground surface"  
Additional data may have been collected in the field which is not included on this log.

# LOG OF Boring EPP-5

SHEET 1 OF 1

Client Rhodia

Drill Contractor O'Keefe

Project Name Rhodia RFI

Drill Method HSA

Number 26/46-006

Drilling Started 5/16/09 Ended 5/16/09

Elevation --

Location Silver Bow, Montana

Logged By MMB/JLS4

Total Depth 16.0

| DEPTH<br>FEET | SAMP. LENGTH<br>& RECOVERY | SAMP. NUMBER | Blows/6 in.     | Discoloration-<br>Odor-<br>Sheen | Moisture | ASTM | LITHOLOGY | DESCRIPTION                                                                                                                                    | DEPTH<br>FEET |
|---------------|----------------------------|--------------|-----------------|----------------------------------|----------|------|-----------|------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
|               |                            | 1            | 9-29-<br>76-88  | None<br>None<br>None             | Dry      | FILL |           | 0-1.2': Fill, loose silica.                                                                                                                    |               |
|               |                            | 2            | 33-63-<br>40-44 | None<br>None<br>None             | Dry      | SM   |           | 1.2-3': Fine to coarse sand with 40% fine gravel and 20% fines. Dark yellow-brown.                                                             |               |
|               |                            |              |                 |                                  |          |      |           | 3-4': Silty sand with gray slag cobbles, light yellowish brown(10 yr 6/4).                                                                     |               |
| 5             |                            | 3            | 18-44-<br>39-59 | None<br>None<br>None             | Dry      | FILL |           | 4-5': Fill, heterogenous silty clay with sand with gray slag pieces and thin sandy black and gray lenses.                                      | 5             |
|               |                            |              |                 |                                  |          | CL   |           | 5-6': Sandy clay, micaceous, light yellowish brown sand, fine to coarse-grained, up to 30% sand at 6'.                                         |               |
|               |                            | 4            | 13-14-<br>17-25 | None<br>None<br>None             | Dry      |      |           | 7-16': Sandy silt, sand(15-20%) is fine-grained, micaceous, finely laminated, light yellow brown.<br>(contact with sandy clay above estimated) |               |
| 10            |                            | 5            | 14-22-<br>26-41 | None<br>None<br>None             | Dry      | ML   |           |                                                                                                                                                | 10            |
|               |                            | 6            | 18-26-<br>32-34 | None<br>None<br>None             | Dry      |      |           |                                                                                                                                                |               |
| 15            |                            | 7            | 12-19-<br>29-43 | None<br>None<br>None             | Dry      |      |           |                                                                                                                                                | 15            |
|               |                            |              |                 |                                  |          |      |           | End of Boring - 16 feet                                                                                                                        |               |



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Remarks: Collected analytical soil samples at 5-6', 7-9', 10-11', 12-14' and composite sample 5-14'.

BGS = "below ground surface"  
Additional data may have been collected in the field which is not included on this log.

# LOG OF Boring EPP-6

SHEET 1 OF 1

Client Rhodia

Drill Contractor O'Keefe

Project Name Rhodia RFI

Drill Method HSA

Number 26/46-006

Drilling Started 5/16/09 Ended 5/16/09

Elevation --

Location Silver Bow, Montana

Logged By MMB/JLS4

Total Depth 13.0

| DEPTH<br>FEET | SAMP. LENGTH<br>& RECOVERY | SAMP. NUMBER | Blows/6 in.     | Discoloration-<br>Odor-<br>Sheen | Moisture | ASTM  | LITHOLOGY | DESCRIPTION                                                                                            | DEPTH<br>FEET |
|---------------|----------------------------|--------------|-----------------|----------------------------------|----------|-------|-----------|--------------------------------------------------------------------------------------------------------|---------------|
| 0             |                            |              |                 |                                  |          |       |           | 0-3': Fill; black, slag material and granular tailings, fines, dense below 1', black to reddish brown. | 0             |
| 2             |                            | 1            | 7-40-<br>36-46  | None<br>None<br>None             | Dry      | FILL  |           |                                                                                                        | 2             |
| 4             |                            | 2            | 15-14-<br>14-21 | None<br>None<br>None             | Dry      |       |           | 3-13': Silt, non-plastic, 20% fine-grained sand, micaceous, light yellowish brown(10 yr 6/4).          | 4             |
| 6             |                            | 3            | 12-15-<br>13-21 | None<br>None<br>None             | Dry      | ML    |           | Small white mottling.                                                                                  | 6             |
| 8             |                            | 4            | 16-19-<br>20-28 | None<br>None<br>None             | Dry      |       |           |                                                                                                        | 8             |
| 10            |                            | 5            | 11-16-<br>23-28 | None<br>None<br>None             | Dry      | ML-SM |           | Sand content increases.                                                                                | 10            |
| 12            |                            | 6            | 13-22-<br>28-39 | None<br>None<br>None             | Dry      |       |           |                                                                                                        | 12            |
| 14            |                            |              |                 |                                  |          |       |           | End of Boring - 13 feet                                                                                | 14            |



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Remarks: Collected analytical soil samples at 3-5.5', 5.5-8', 8.5-10.5', 11-13' and composite sample 3-13'.

BGS = "below ground surface"  
Additional data may have been collected in the field which is not included on this log.

# LOG OF Boring EPP-7

SHEET 1 OF 1

Client Rhodia

Drill Contractor O'Keefe

Project Name Rhodia RFI

Drill Method HSA

Number 26/46-006

Drilling Started 5/16/09 Ended 5/16/09

Elevation --

Location Silver Bow, Montana

Logged By MMB/JLS4

Total Depth 12.0

| DEPTH<br>FEET | SAMP. LENGTH<br>& RECOVERY | SAMP. NUMBER | Blows/6 in.     | Discoloration-<br>Odor-<br>Sheen | Moisture | ASTM | LITHOLOGY | DESCRIPTION                                                                                            | DEPTH<br>FEET |
|---------------|----------------------------|--------------|-----------------|----------------------------------|----------|------|-----------|--------------------------------------------------------------------------------------------------------|---------------|
| 0             |                            |              |                 |                                  |          |      |           | 0-2': Fill; black heterogenous, slag and granular coke fines and silica rock cobbles.                  | 0             |
| 2             |                            | 1            | 6-11-<br>17-16  | None<br>None<br>None             | Dry      | FILL |           |                                                                                                        | 2             |
| 4             |                            | 2            | 8-17-<br>31-31  | None<br>None<br>None             | Dry      | SM   |           | 2-7': Silty sand, micaceous, light yellowish brown(10 yr 6/4).                                         | 4             |
| 6             |                            | 3            | 12-22-<br>32-42 | None<br>None<br>None             | Dry      |      |           | 2" coarse sand layer.<br>Color changes to yellowish brown(10 yr 5/6).                                  | 6             |
| 8             |                            | 4            | 21-25-<br>25-36 | None<br>None<br>None             | Dry      | SP   |           | 7.5-11.2': Sand, fine to coarse-grained, yellowish brown.<br>(contact with silty sand above estimated) | 8             |
| 10            |                            | 5            | 22-33-<br>52-87 | None<br>None<br>None             | Dry      |      |           |                                                                                                        | 10            |
| 12            |                            |              |                 |                                  |          | SM   |           | 11.2-12': Silty sand, little mica, yellowish brown with reddish mottling.                              | 12            |
| 14            |                            |              |                 |                                  |          |      |           | End of Boring - 12 feet                                                                                | 14            |



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Remarks: Collected analytical soil samples at 2-4', 5-7', 7.5-9.5', 10-12' and composite sample 2-12'.

BGS = "below ground surface"  
Additional data may have been collected in the field which is not included on this log.

# LOG OF Boring EPP-8

SHEET 1 OF 1

Client Rhodia

Drill Contractor O'Keefe

Project Name Rhodia RFI

Drill Method HSA

Number 26/46-006

Drilling Started 5/16/09 Ended 5/16/09

Elevation --

Location Silver Bow, Montana

Logged By MMB

Total Depth 11.0

| DEPTH<br>FEET | SAMP. LENGTH<br>& RECOVERY | SAMP. NUMBER | Blows/6 in.     | Discoloration-<br>Odor-<br>Sheen | Moisture | ASTM  | LITHOLOGY | DESCRIPTION                                                                                                                                     | DEPTH<br>FEET |
|---------------|----------------------------|--------------|-----------------|----------------------------------|----------|-------|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
|               |                            |              |                 |                                  |          |       |           | 0-1': Black fill with gray slag, loose, G/S/F: 20/60/20                                                                                         |               |
|               |                            | 1            | 10-24-<br>29-14 | None<br>None<br>None             | Dry      | FILL  |           | 1-2': Silty sand with some gravel, very dense, brown(10 yr 4/3).                                                                                |               |
| 2             |                            |              |                 |                                  |          |       |           | 2-6': Silty sand, fine-grained, homogenous, light yellowish brown(10 yr 6/4).                                                                   | 2             |
|               |                            | 2            | 6-9-8-8         | None<br>None<br>None             | Dry      | SM    |           |                                                                                                                                                 |               |
| 4             |                            |              |                 |                                  |          |       |           | Silt content increases, micaceous.                                                                                                              | 4             |
|               |                            | 3            | 6-4-5-<br>14    | None<br>None<br>None             | Dry      | SM-ML |           |                                                                                                                                                 |               |
| 6             |                            |              |                 |                                  |          |       |           | 6-9': Silty with sand(15-20%), sand fine to medium-grained, homogenous, non-plastic, light yellowish brown. (contact with silt above estimated) | 6             |
|               |                            | 4            | 12-20-<br>27-35 | None<br>None<br>None             | Dry      | ML    |           |                                                                                                                                                 |               |
| 8             |                            |              |                 |                                  |          |       |           |                                                                                                                                                 |               |
|               |                            | 5            | 4-20-<br>28-32  | None<br>None<br>None             | Dry      | SM    |           | 9-11': Silty sand, fine to medium-grained, occasional pebbles, homogenous, non-plastic, light yellowish brown.                                  | 10            |
| 10            |                            |              |                 |                                  |          |       |           | End of Boring - 11 feet                                                                                                                         |               |
| 12            |                            |              |                 |                                  |          |       |           |                                                                                                                                                 | 12            |
| 14            |                            |              |                 |                                  |          |       |           |                                                                                                                                                 | 14            |



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Remarks: Collected analytical soil sample at 1-3.5', 3.5-6', 6.5-8.5', 9-11' and composite sample 1-11'.

BGS = "below ground surface"  
Additional data may have been collected in the field which is not included on this log.

# LOG OF Boring EPP-9

SHEET 1 OF 1

Client Rhodia

Drill Contractor O'Keefe

Project Name Rhodia RFI

Drill Method HSA

Number 26/46-006

Drilling Started 5/17/09 Ended 5/17/09

Elevation --

Location Silver Bow, Montana

Logged By JLS4

Total Depth 10.0

| DEPTH<br>FEET | SAMP. LENGTH<br>& RECOVERY | SAMP. NUMBER | Blows/6 in.          | Discoloration-<br>Odor-<br>Sheen | Moisture | ASTM | LITHOLOGY                                                                                                                                             | DESCRIPTION | DEPTH<br>FEET |
|---------------|----------------------------|--------------|----------------------|----------------------------------|----------|------|-------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|---------------|
| 0-2           | 1                          | 6-6-12-4     | None<br>None<br>None | Dry                              | SM       |      | 0-1.5': Reworked soil with black coke fines, brown(10 yr 5/3) with reddish and white mottling.<br><br>1.5-2': Silty sand, yellowish brown(10 yr 5/4). | 0-2         |               |
| 2-4           | 2                          | 6-6-8-17     | None<br>None<br>None | Dry                              | ML       |      | 3-5': Silt with sand, some mica, light yellowish brown(10 yr 6/4) with white mottling and white flecks.<br>(contact with silty sand above estimated)  | 2-4         |               |
| 4-6           | 3                          | 11-17-23-30  | None<br>None<br>None | Dry                              | SP-SM    |      | 5.5-10': Sand with silt, micaceous, light yellowish brown with white flecks.<br>(contact with sand with silt above estimated)                         | 4-6         |               |
| 6-8           | 4                          | 14-29-42-52  | None<br>None<br>None | Dry                              |          |      |                                                                                                                                                       | 6-8         |               |
| 8-10          |                            |              |                      |                                  |          |      | End of Boring - 10 feet                                                                                                                               | 8-10        |               |
| 10-12         |                            |              |                      |                                  |          |      |                                                                                                                                                       | 10-12       |               |
| 12-14         |                            |              |                      |                                  |          |      |                                                                                                                                                       | 12-14       |               |



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Remarks: Collected analytical soil sample at 0-2', 3-5', 5.5-7.5', 8-10' and composite sample 0-10'.

BGS = "below ground surface"  
Additional data may have been collected in the field which is not included on this log.

# LOG OF Boring EPP-10

SHEET 1 OF 1

Client Rhodia

Drill Contractor O'Keefe

Project Name Rhodia RFI

Drill Method HSA

Number 26/46-006

Drilling Started 5/17/09 Ended 5/17/09

Elevation --

Location Silver Bow, Montana

Logged By JLS4

Total Depth 17.0

| DEPTH<br>FEET | SAMP. LENGTH<br>& RECOVERY | SAMP. NUMBER | Blows/6 in.     | Discoloration-<br>Odor-<br>Sheen | Moisture          | ASTM | LITHOLOGY | DESCRIPTION                                                                                                            | DEPTH<br>FEET |
|---------------|----------------------------|--------------|-----------------|----------------------------------|-------------------|------|-----------|------------------------------------------------------------------------------------------------------------------------|---------------|
|               |                            | 1            | 6-7-7-<br>11    | None<br>None<br>None             |                   |      |           | 0-5.7': Black heterogeneous fill, slag cobbles, coke fines, silica gravel, G/S/F: 50/40/10.                            |               |
|               |                            | 2            | 7-8-9-<br>10    | None<br>None<br>None             | Dry               | FILL |           |                                                                                                                        |               |
| 5             |                            | 3            | 10-29-<br>49-26 | None<br>None<br>None             |                   |      |           |                                                                                                                        | 5             |
|               |                            | 4            | 8-8-10-<br>11   | None<br>None<br>None             | Slightly<br>moist |      |           | 5.7-7': Fill - fine grained silty tailing? non plastic, laminated, dark reddish brown (7.5 r 3/2) nonsmoking, no odor. |               |
|               |                            |              |                 |                                  |                   |      |           | 7-17': Sandy silt, fine-grained sand, micaceous, hard, brown(10 yr 4/3), to light yellowish brown(10 yr 5/6).          |               |
| 10            |                            | 5            | 7-10-<br>12-14  | None<br>None<br>None             | Dry               |      |           |                                                                                                                        | 10            |
|               |                            | 6            | 14-20-<br>29-36 | None<br>None<br>None             |                   | ML   |           |                                                                                                                        |               |
| 15            |                            | 7            | 18-30-<br>35-45 | None<br>None<br>None             | Dry               |      |           |                                                                                                                        | 15            |
|               |                            |              |                 |                                  |                   |      |           | End of Boring - 17 feet                                                                                                |               |



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Remarks: Collected analytical soil samples at 7-8', 9-11', 12-14', 15-17' and composite sample 7-17'.

BGS = "below ground surface"  
Additional data may have been collected in the field which is not included on this log.

# LOG OF Boring EPP-11

SHEET 1 OF 1

Client Rhodia

Drill Contractor O'Keefe

Project Name Rhodia RFI

Drill Method HSA

Number 26/46-006

Drilling Started 5/17/09 Ended 5/17/09

Elevation --

Location Silver Bow, Montana

Logged By MMB/JLS4

Total Depth 12.0

| DEPTH<br>FEET | SAMP. LENGTH<br>& RECOVERY | SAMP. NUMBER | Blows/6 in.     | Discoloration-<br>Odor-<br>Sheen | Moisture | ASTM | LITHOLOGY | DESCRIPTION                                                                                                            | DEPTH<br>FEET |
|---------------|----------------------------|--------------|-----------------|----------------------------------|----------|------|-----------|------------------------------------------------------------------------------------------------------------------------|---------------|
| 0             |                            |              |                 |                                  |          |      |           | 0-2': Fill, coarse granular slag, gray to dark brown.                                                                  |               |
| 2             |                            | 1            | 8-12-<br>17-17  | None<br>Faint Sulfur<br>None     | Dry      | FILL |           |                                                                                                                        |               |
| 4             |                            | 2            | 7-8-7-7         | None<br>None<br>None             | Dry      | ML   |           | 2.0-7.0': Silt with fine grained sand, yellowish brown (10 yr 5/4), non-plastic, firm.                                 | 2             |
| 6             |                            | 3            | 10-4-4-<br>6    | None<br>None<br>None             | Dry      |      |           |                                                                                                                        |               |
| 8             |                            | 4            | 13-16-<br>23-32 | None<br>None<br>None             | Dry      | SM   |           | 7.5-9.5': Silty sand, light yellowish brown(10 yr 6/4), non-plastic, firm-hard. (contact with silt above estimated)    | 8             |
| 10            |                            | 5            | 20-25-<br>38-59 | None<br>None<br>None             | Dry      | ML   |           | 10-12': Silt with sand, brownish yellow (10 yr 6/6), non-plastic, firm-hard. (contact with silty sand above estimated) | 10            |
| 12            |                            |              |                 |                                  |          |      |           | End of Boring - 12 feet                                                                                                | 12            |
| 14            |                            |              |                 |                                  |          |      |           |                                                                                                                        | 14            |



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Remarks: Collected analytical soil samples at 2.5-4.5', 5-7', 7.5-9.5', 10-12'.

BGS = "below ground surface"  
Additional data may have been collected in the field which is not included on this log.

# LOG OF Boring EPP-12

SHEET 1 OF 1

Client Rhodia

Drill Contractor O'Keefe

Project Name Rhodia RFI

Drill Method HSA

Number 26/46-006

Drilling Started 5/17/09 Ended 5/17/09

Elevation --

Location Silver Bow, Montana

Logged By MMB/JLS4

Total Depth 9.5

| DEPTH<br>FEET | SAMP. LENGTH<br>& RECOVERY | SAMP. NUMBER | Blows/6 in.     | Discoloration-<br>Odor-<br>Sheen | Moisture | ASTM | LITHOLOGY | DESCRIPTION                                                                                                                | DEPTH<br>FEET |
|---------------|----------------------------|--------------|-----------------|----------------------------------|----------|------|-----------|----------------------------------------------------------------------------------------------------------------------------|---------------|
| 0             |                            |              |                 |                                  |          |      |           | 0-0.3': Fill, black, organic(?).                                                                                           | 0             |
| 2             |                            | 1            | 4-12-<br>19-23  | None<br>None<br>None             | Dry      |      |           | 0.3-7.5': Silt with sand, brownish yellow(10 yr 6/6), non-plastic, firm to hard, micaceous.                                | 2             |
| 4             |                            | 2            | 8-15-<br>22-27  | None<br>None<br>None             | Dry      | ML   |           |                                                                                                                            | 4             |
| 6             |                            | 3            | 15-27-<br>33-38 | None<br>None<br>None             | Dry      |      |           |                                                                                                                            | 6             |
| 8             |                            | 4            | 14-21-<br>31-52 | None<br>None<br>None             | Dry      | SM   |           | 7.5-9.5': Silty sand, yellowish brown(10 yr 5/4) sand is fine to medium-grained, coarsening toward 9.5', hard non-plastic. | 8             |
| 10            |                            |              |                 |                                  |          |      |           | End of Boring - 9.5 feet                                                                                                   | 10            |
| 12            |                            |              |                 |                                  |          |      |           |                                                                                                                            | 12            |
| 14            |                            |              |                 |                                  |          |      |           |                                                                                                                            | 14            |



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Remarks: Collected analytical soil samples at 0-2', 2.5-4.5', 5-7', and 7.5-9.5' and composite sample 0-9.5'.

BGS = "below ground surface"  
Additional data may have been collected in the field which is not included on this log.

# LOG OF Boring EPP-13

SHEET 1 OF 1

Client Rhodia

Drill Contractor O'Keefe

Project Name Rhodia RFI

Drill Method HSA

Number 26/46-006

Drilling Started 5/18/09 Ended 5/18/00

Elevation --

Location Silver Bow, Montana

Logged By MMB/JLS4

Total Depth 10.5

| DEPTH<br>FEET | SAMP. LENGTH<br>& RECOVERY | SAMP. NUMBER | Blows/6 in.     | Discoloration-<br>Odor-<br>Sheen | Moisture | ASTM | LITHOLOGY | DESCRIPTION                                                                                | DEPTH<br>FEET |
|---------------|----------------------------|--------------|-----------------|----------------------------------|----------|------|-----------|--------------------------------------------------------------------------------------------|---------------|
|               |                            |              |                 |                                  |          | FILL |           | 0-1': Fill, railroad tie and granular slag.                                                |               |
| 2             |                            | 1            | 11-16-<br>25-36 |                                  | Dry      |      |           | 2-4': Sandy silt, brownish yellow(10 yr 6/6), firm non-plastic.                            | 2             |
| 4             |                            | 2            | 9-17-<br>26-36  | None<br>None<br>None             | Dry      | ML   |           | 4.5-5.5': Light yellowish brown(10 yr 6/4).                                                | 4             |
| 6             |                            | 3            | 9-21-<br>45-56  | None<br>None<br>None             | Dry      |      |           | 6-8': Silty fine-grained sand, yellowish brown(10 y 5/4), dense, non-plastic, homogeneous. | 6             |
| 8             |                            |              |                 |                                  |          | SM   |           |                                                                                            | 8             |
| 10            |                            | 4            | 19-37-<br>15-63 | None<br>None<br>None             | Dry      |      |           |                                                                                            | 10            |
|               |                            |              |                 |                                  |          |      |           | End of Boring - 10.5 feet                                                                  |               |
| 12            |                            |              |                 |                                  |          |      |           |                                                                                            | 12            |
| 14            |                            |              |                 |                                  |          |      |           |                                                                                            | 14            |



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Remarks: Collected analytical soil samples at 2-3', 3.5-5.5', 6-8', 8.5-10.5' and composite sample 2-10.5'.

BGS = "below ground surface"  
Additional data may have been collected in the field which is not included on this log.

# LOG OF Boring EPP-14

SHEET 1 OF 1

Client Rhodia

Drill Contractor O'Keefe

Project Name Rhodia RFI

Drill Method HSA

Number 26/46-006

Drilling Started 5/19/09 Ended 5/19/09

Elevation --

Location Silver Bow, Montana

Logged By MMB/JLS4

Total Depth 11.5

| DEPTH<br>FEET | SAMP. LENGTH<br>& RECOVERY | SAMP. NUMBER | Blows/6 in.     | Discoloration-<br>Odor-<br>Sheen        | Moisture | ASTM  | LITHOLOGY | DESCRIPTION                                                                                                                                       | DEPTH<br>FEET |
|---------------|----------------------------|--------------|-----------------|-----------------------------------------|----------|-------|-----------|---------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
| 0             |                            | 1            | 50+---          | None<br>Faint<br>naphthalene<br>None    | Dry      | FILL  |           | 0-2': Fill, railroad tie covered by asphalt. Drillers augered through railroad tie.                                                               | 0             |
| 2             |                            | 2            | 15-29-<br>37-50 | None<br>None<br>None                    | Dry      | SM    |           | 2-4.5': Silty fine-grained sand, yellowish brown(10 yr 5/4), firm, non-plastic, with thin, white partings below 3'.<br>pH of soil in water : 8.00 | 2             |
| 4             |                            |              |                 |                                         |          |       |           |                                                                                                                                                   | 4             |
| 6             |                            | 3            | 4-28-<br>38-47  | None<br>None<br>None                    | Dry      | SP-SM |           | 4.5-5.5': Fine-grained sand with silt, yellowish brown, firm, non-plastic, micaceous.<br>pH of soil in water : 7.88                               | 6             |
| 8             |                            | 4            | 20-34-<br>49-69 | None<br>Moderate<br>Naphthalene<br>None | Dry      | ML    |           | 7-11.5': Sandy silt, yellowish brown, sand is fine-grained, non-plastic, homogeneous, hard.<br>pH of soil in water : 7.87                         | 8             |
| 10            |                            | 5            | 21-37-<br>45-49 | None<br>None<br>None                    | Dry      |       |           | pH of soil in water : 7.72                                                                                                                        | 10            |
| 12            |                            |              |                 |                                         |          |       |           | End of Boring - 11.5 feet                                                                                                                         | 12            |
| 14            |                            |              |                 |                                         |          |       |           |                                                                                                                                                   | 14            |



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Remarks: Collected soil analytical samples at 2-4', 4.5-6.5', 7-9', 9.5-11.5' and composite sample 2-11.5'.  
pH of soil in water samples refrigerated until tests conducted on 5/27/09.

BGS = "below ground surface"  
Additional data may have been collected in the field which is not included on this log.