State of Washington
POLLUTION LIABILITY INSURANCE AGENCY
300 Desmond Drive SE • PO Box 40930 • Olympia, Washington 98504-0930
(360) 407-0520 • (800) 822-3905 • FAX (360) 407-0509
www.plia.wa.gov

April 19, 2021

Gayteway Business Park, LLC
C/O Mr. Chris Gayte
P.O. Box 1727
Bellevue, WA 98009

Re: No Further Action at the Following Site:

- **Facility/Site Name:** Northwest Hardwoods Arlington
- **Facility/Site Address:** 20015 67th Avenue NE, Arlington, WA 98223
- **Facility Site ID:** 36489214
- **PTAP Project No.:** PNW252

Dear Mr. Gayte:

The Washington State Pollution Liability Insurance Agency (PLIA) received your request for an opinion on your independent cleanup of the Northwest Hardwoods Arlington (Site) by Environmental Associates, Inc. (EAI).

This letter provides our opinion. Opinions by the Pollution Liability Insurance Agency (PLIA) are made under the authority of Chapter 70A.330 RCW and the Model Toxics Control Act (MTCA), Chapter 70A.305 RCW.

Issue Presented and Opinion

Is further remedial action necessary to clean up contamination at the Site?

> PLIA has determined that **no further remedial action is necessary** to clean up contamination at the Site.

This opinion is based on an analysis of whether the remedial action meets the substantive requirements of MTCA, Chapter 70A.305 RCW, and its implementing regulations, Chapter 173-340 WAC (collectively "substantive requirements of MTCA"). The analysis is provided below.

Description of the Property and the Site

This opinion applies only to the Site located at 20015 67th Avenue NE, Arlington, WA 98223 and comprises one Snohomish County tax parcel(s) described below and in Enclosure A. This opinion does not apply to any other release(s) that may affect the Site (parcels). Any such releases, if known, are identified separately below.

1. Description of the Property:

The Property includes the following tax parcel in Snohomish County, affected by the Site and addressed by your cleanup (Figs. 1 & 2):

- Tax Parcel No.: 31051400200700

2. Description of the Site:

The parcel makes up the Site, and is defined by the nature and extent of contamination associated with the following release (Figs. 3 through 6):

- Total petroleum hydrocarbons: TPH-d (diesel) and TPH-o (oil) into the soil/vapor.
- Volatile organic compounds; benzene, toluene, ethylbenzene and total xylenes, and naphthalenes into the soil/vapor.

3. Identification of other sites that may affect the Property.

Please note that a parcel of real property can be affected by multiple sites. At this time, we have no information that this Site was affected by other sites.

Enclosure A includes a diagram of the Site, as currently known to PLIA.

Basis of the Opinion

This opinion is based on the information contained in the following documents:

1. Remediation Investigation Summary Report, Gayteway Development (Former Northwest Hardwoods) 20015 – 67th Avenue NE, Arlington, Washington 98223. By Environmental Associates, Inc. of February 26th, 2020.
2. Addendum: PLIA Meeting Follow-up Research Gayteway Development (Former Northwest Hardwoods) 20015 – 67th Avenue NE, Arlington, Washington 98223. By Environmental Associates, Inc. of October 12, 2020.
3. Addendum: Stockpile Soil Removal Gayteway Development (Former Northwest Hardwoods) 20015 – 67th Avenue NE, Arlington, Washington 98223. By Environmental Associates, Inc. of March 3, 2021.

Documents submitted to PLIA are subject to the Public Records Act (Chapter 42.56 RCW). To make a request for public records, please email pliamail@plia.wa.gov.

This opinion is void if any of the information contained in those documents is materially false or misleading.

Analysis of the Cleanup

PLIA has concluded that **no further remedial action** is necessary at the Site. Our conclusion is based on the following analysis:

1. History and Characterization of the Site

The Site is located within the provenance of the Marysville Trough and is mapped to contain recessional outwash, a glacial deposit of moderately to poorly sorted gravel and sand with small amounts of silt and clay. Soil encountered on site was consistent with the mapped geology, in addition to areas of sawdust and wood debris approximately 10'–20' thick primarily along the northeast portions of the western parcel, proximal to the former sawmill (Fig 2). The Site slopes to the north from 140' above sea level to 120' above sea level in the base of the former wood-waste landfill reclamation area. Groundwater is present at the site 35'-50' below ground surface (bgs).

The Site consists of an irregularly shaped parcel covering 54 acres of land. The property is bisected in a western and eastern portion by a railroad corridor and was formerly occupied by a lumber mill (Fig 2). Lumber mill operations and wood-waste landfill began in the 1950s. The majority of the lumber mill associated improvements were previously demolished and removed from 2013–2017. Remaining on Site is a 6,080 square foot single story former truck shop building on the southwest corner of the eastern parcel and an 8,000 square foot covered storage located on the north end of the western parcel. Historically, the property contained a wood-waste landfill eastern parcel that was closed and reclaimed between 1993 and 2003, which was overseen by the Snohomish County Health Department and Washington State Department of Ecology (Ecology). Five underground storage tanks (USTs) were historically associated with the lumber mill. Three of the USTs were removed from the property in 1986, one UST was excavated and repurposed as an aboveground storage tank (AST), the fifth UST, a 10,000 gallon tank, was closed in place by filling with sand and cement slurry.

Petroleum contaminated soil (PCS) above the MTCA Method A cleanup level (CUL) detected at this Site is associated with the historical use of the Site as a lumber mill and associated infrastructure in the vicinity of the former sawmill's exterior operations area. The contamination is associated with numerous conveyors and mechanical components of the mill's operation and maintenance of hydraulic oils,

lubricants, and greases.

Conceptual Site Model (Exposure Pathways)

The Conceptual Site Model summarizes the primary transport mechanisms of potential spills and leaks from their primary sources; their fate and transport and exposure pathways through soil/groundwater/vapor to the receptors that potentially may include humans, aquatic/marine and terrestrial organisms. The primary source of contamination at this Site is from lumber mill activities and associated machinery (Figs. 2 & 3).

i. **Soil Direct Contact Narrative**: PCS was identified at the southern end of the western portion above the MTCA Method A CUL in the vicinity of soil test pits SS1 and SS2(Fig. 3, Table 1). Soil contamination was encountered at approximately 0-14' bgs within the depths (0 to 15' bgs) that humans (utility workers and property developers) may come in contact.

Result: The direct contact exposure pathway was a concern at this Site.

ii. **Groundwater:**

- **Depth to Groundwater**: Environmental Associates, Inc. (EAI) identified groundwater at a depth of 35'-50' bgs.
- **Groundwater Flow**: Groundwater flow is assumed to be to the north-northwest. Groundwater flow from the landfill was reported to be southeasterly.
- **Groundwater Narrative**: Groundwater monitoring data from the landfill cleanup indicated that petroleum contamination was not present at the Site in proximity to the landfill area. Groundwater conditions were not encountered in the UST locations.

Result: The soil to groundwater exposure pathway is not a concern at this Site.

iii. **Vapor Exposure:**

- **Lateral Inclusion Zone**: Building footprints within the lateral inclusion zone of 30' or within a 15' vertical separation distance from the edge of a contaminant source that is above the MTCA Method A unrestricted land use (soil or groundwater) may require vapor assessment or mitigation. The lateral inclusion zones and vertical separations are the areas surrounding a contaminant source through which vapor phase contamination might travel and intrude into buildings (ITRC 2018, EPA 2018, Ecology Draft VI Guidance update 2018).
- **Vapor Narrative**: The future land use of the Site is redevelopment as

industrial sites and splitting the current property into six industrial parcels.

Result: The soil vapor exposure pathway was a concern at this Site.

iv. Surface Water:

- **Distance to Nearest Surface Water**: The Cowlitz River and Lake Sacajawea are located 0.5 miles east and west, respectively (Fig. 1).
- **Surface Water Narrative**: Groundwater data shows that local groundwater has not been contaminated as a result of the PCS.

Result: The surface water exposure pathway is not a concern at this Site.

2. Establishment of Cleanup Standards and Points of Compliance

PLIA has determined the cleanup levels and points of compliance you established for the Property meet the substantive requirements of MTCA.

i. Cleanup Levels (CUL):

Table 1. The proposed soil and groundwater cleanup levels are:

Contaminants of Concern (COCs)	**Method A** Soil Cleanup Level Unrestricted Land Use mg/kg	**Method B** Soil Cleanup Level Unrestricted Land Use mg/kg	**Method A** Groundwater Cleanup Level ug/l
TPH-d	2,000	(Site Specific)	500
TPH-g	30/100*	(Site Specific)	800/1,000*
TPH-o	2,000	(Site Specific)	500
Benzene (carcinogen)	0.03	(Site Specific)	5
Toluene	7	(Site Specific)	1,000
Ethylbenzene	6	(Site Specific)	700
Xylene	9	(Site Specific)	1,000
Total Lead	250	(Site Specific)	15

*When Benzene is not present.

Table 2. The proposed vapor cleanup levels are:

Contaminants of Concern (COCs)	**Method B** Sub-Slab/Soil Gas Screening Levels ug/m^3	**Method B** Indoor/Air Cleanup Levels ug/m^3
Benzene (carcinogen)	10.7	0.321
Toluene	15,600	2,290
Ethylbenzene	15,200	457
Xylene	310	45.7

Total Lead	-	-
Naphthalene (carcinogen) (does not include 1-methyl and 2-methyl naphthalene)	2.45	0.0735
Total Petroleum Hydrocarbon (TPH)	4,700*	140
APH [EC5-8 Aliphatics]	90,000	2,700
APH [EC9-12 Aliphatics]	4,700	140
APH [EC9-10 Aromatics]	6,000	180

* Based on the current attenuation factor of 0.03.

ii. Points of Compliance:

The proposed cleanup levels must be met at the following Points of Compliance (POC):

Soil-Direct Contact: For CULs based on human exposure via direct contact, the standard POC is: "*…throughout the Site from ground surface to 15 feet below the ground surface.*" This is in compliance with WAC 173-340-740(6)(d) and represents a reasonable estimate of the depth of soil that could be excavated and distributed at the soil surface as a result of Site development activities.

Groundwater: For groundwater, the standard POC as established under WAC 173-340-720(8) is: "*…throughout the site from the uppermost level of the saturated zone extending vertically to the lowest most depth which could potentially be affected by the site.*"

Air/Vapor: CULs need to be attained in the ambient air throughout the Site, including indoor air within the lateral and vertical inclusion zone (WAC 173-340-750[6]).

3. Past Remedial Actions at the Site:

PLIA has determined past remedial actions conducted at the Site **have been sufficient** to meet CULs at the POC.

1993-2005: With oversight from the Snohomish County Health Department and Ecology, the wood-waste landfill on the eastern portion was formally closed and reclaimed. Approximately 945 cubic yards of material containing boiler-ash, burnt wood and wood-waste was segregated and removed as hazardous waste. Groundwater monitoring data confirmed that all relevant contaminants of concern were below cleanup levels. The Snohomish County Health Department ceased groundwater monitoring requirements in 2005.

2011: Environ completed a Phase I on the property for Weyerhaeuser. The Phase I indicated the eastern parcel was a former gravel pit in the 1950s and 60s and was later used as a wood-waste landfill. Weyerhaeuser acquired Northwest Hardwoods, the previous lumber business in 1980.

2013: Adapt completed a Phase II site assessment advancing 16 direct push soil borings and four hollow-stem auger borings. These borings targeted the suspected location of former USTs, septic systems and ASTs. Seventeen soil samples and five groundwater samples were collected and analyzed for petroleum hydrocarbons with no detections reported.

The Site was enrolled in Ecology's Voluntary Cleanup Program. Ecology issued an opinion letter stating that the site assessment completed by Adapt was not sufficient to characterize the Site.

2019: Environmental Associates, Inc. (EAI) provided an updated Phase 1 report. EAI completed a geophysical survey using ground penetrating radar and collected soil samples in the vicinity of four geophysical "anomalies" (A1-A4); the closed in place 10,000 gallon UST (UST –SEC, UST1 – N, and UST1-@), the vicinity of the former scale house gasoline USTs (TP1_ and Patch Area (TP2) and an area of suspected soil contamination encountered on Site (SS1 and SS2). Seventeen soil samples were submitted for analysis, lab results indicated detections of concentrations of diesel and heavy oil at SS1 and SS2 above the MTCA method A cleanup limit. Carcinogenic polycyclic aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), metals, and chlorinated volatile organic compounds were non-detect or below MTCA method A CULs. (Tables A1-A5)

EAI oversaw the excavation of a 15' by 40' excavation to the depth of approximately 12' bgs. Six confirmation samples were collected and were reported to be below MTCA Method A CULs. Excavated soil was stockpiled in a paved area on the eastern parcel and covered with plastic sheeting.

4. Selection of Cleanup Action:

PLIA has determined that the cleanup action you <u>selected</u> meets cleanup standards established for the Site and they include:

- Excavation of about 648.85 tons of PCS that was stockpiled on Site and later disposed of off-site to the Cadman Facility in Everett Washington.
- Collected Soil Confirmation Sampling.

5. Cleanup of the Site:

PLIA has determined the cleanup action you <u>performed</u> meets the substantive requirements of MTCA and met CULs at the POC at this Site.

i. Soil:

- **Soil Direct Contact Narrative (Post-Cleanup):** Interim remedial action completed in September 2019 included the excavation of an area approximately 15' wide by 40' long to a depth of 12' bgs. Approximately 648.85 tons of soil were removed during excavation and stockpiled on the eastern parcel and covered with a plastic sheet, soil was later removed to the Cadman Facility in Everett Washington. Post excavation soil confirmation samples indicated that all contaminants of concern were successfully excavated below the MTCA Method A CUL (Fig. 4, Table A6).

Result: The soil direct contact exposure pathway **is no longer a concern** at this Site.

ii. Vapor:

- **Air/Vapor Narrative (Post-Cleanup):** The lateral and vertical extent of PCS detected at the Site were successfully excavated to levels below the MTCA Method A **Unrestricted Land Use** criteria of 2,000 mg/kg for TPH-d.

Result: The soil to air/vapor exposure pathway **is no longer a concern** at this Site.

Limitations of the Opinion

1. Opinion does not settle liability with the state.

Under the MTCA, liable persons are strictly liable, jointly and severally, for all remedial action costs and for all natural resource damages resulting from the release(s) of hazardous substances at the Site. This opinion **does not:**

- Change the boundaries of the Site.
- Resolve or alter a person's liability to the state.
- Protect liable persons from contribution claims by third parties.

To settle liability with the state and obtain protection from contribution claims, a person must enter into a consent decree with the Office of the Attorney General and the Department of Ecology under RCW 70A.305.040 (4).

2. Opinion does not constitute a determination of substantial equivalence.

To recover remedial action costs from other liable persons under the MTCA, one must demonstrate that the action is the substantial equivalent of an Ecology-conducted or Ecology- supervised action. This opinion does not determine whether

the action you performed is equivalent. Courts make that determination (RCW 70A.305.080 and WAC 173-340-545).

3. State is immune from liability.

The state, PLIA, and its officers and employees are immune from all liability, and no cause of action of any nature may arise from any act or omission in providing this opinion.

Termination of Agreement

Thank you for choosing to cleanup your Site under the Petroleum Technical Assistance Program (PTAP). This opinion terminates the PTAP Agreement governing project PNW252, Northwest Hardwoods Arlington.

Contact Information

If you have any questions about this opinion, please contact us by phone at 1-800-822-3905, or by email at kory.neidich@plia.wa.gov.

Sincerely,

DocuSigned by:
Kory Neidich
85041E045F3B4FA...

Kory Neidich
Site Manager

DocuSigned by:
Nnamdi Madakor
C7FB78C712674E5...

State of Washington
Hydrogeologist
293
Licensed Geologist
NNAMDI I. MADAKOR

Nnamdi Madakor, P. HG, P.G.
Technical Programs Manager

Enclosure A: Figure 1: Site Vicinity Map
Figure 2: Property Map
Figure 3: Western Parcel Detail Map
Figure 4: Western Parcel Excavation and Sampling Map
Figure 5: Eastern Parcel Detail Map
Figure 6: Letter from Snohomish County Health Department
Table A1: Soil Sampling Results - Exploration
Table A2: Soil Sampling Results - Carcinogenic PAH's
Table A3: Soil Sampling Results – Other PAH's and Semi-Volatiles
Table A4: Soil Sampling Results – PCB's
Table A5: Soil Sampling Results – Metals
Table A6: Soil Sampling Results – Chlorinated Volatile Organic Compounds
Table A7: Soil Sampling Results – Confirmation Samples

cc: Mr. Robert Roe, EAI (by email)
Ms. Carrie Pederson, PLIA (by email)
Ms. Kristin Evered, PLIA (by email)
Mr. Tyler Betz, PLIA (by email)

Enclosure A:
Northwest Hardwoods Arlington
PTAP Project No. PNW252

Figure 1: Site Vicinity Map

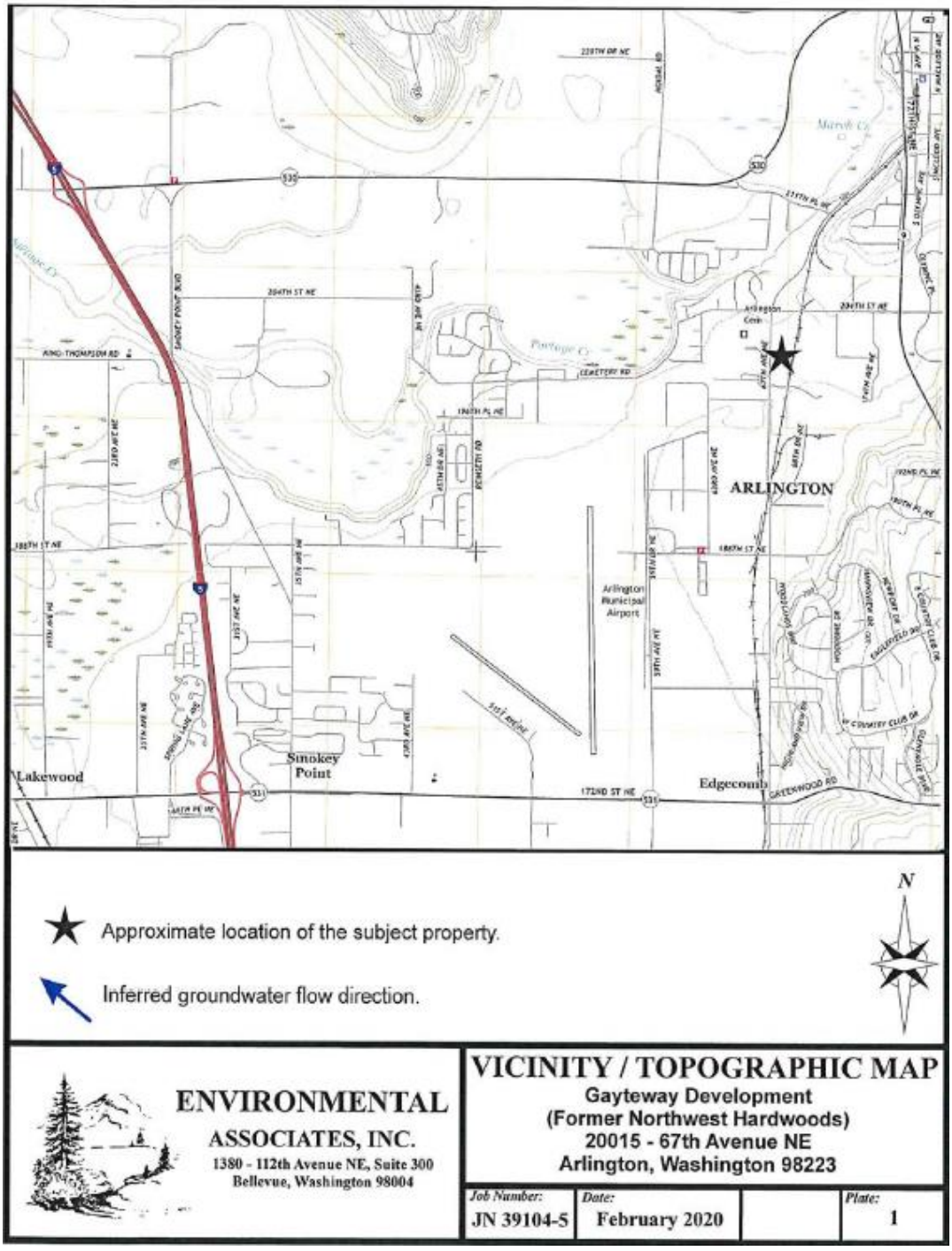
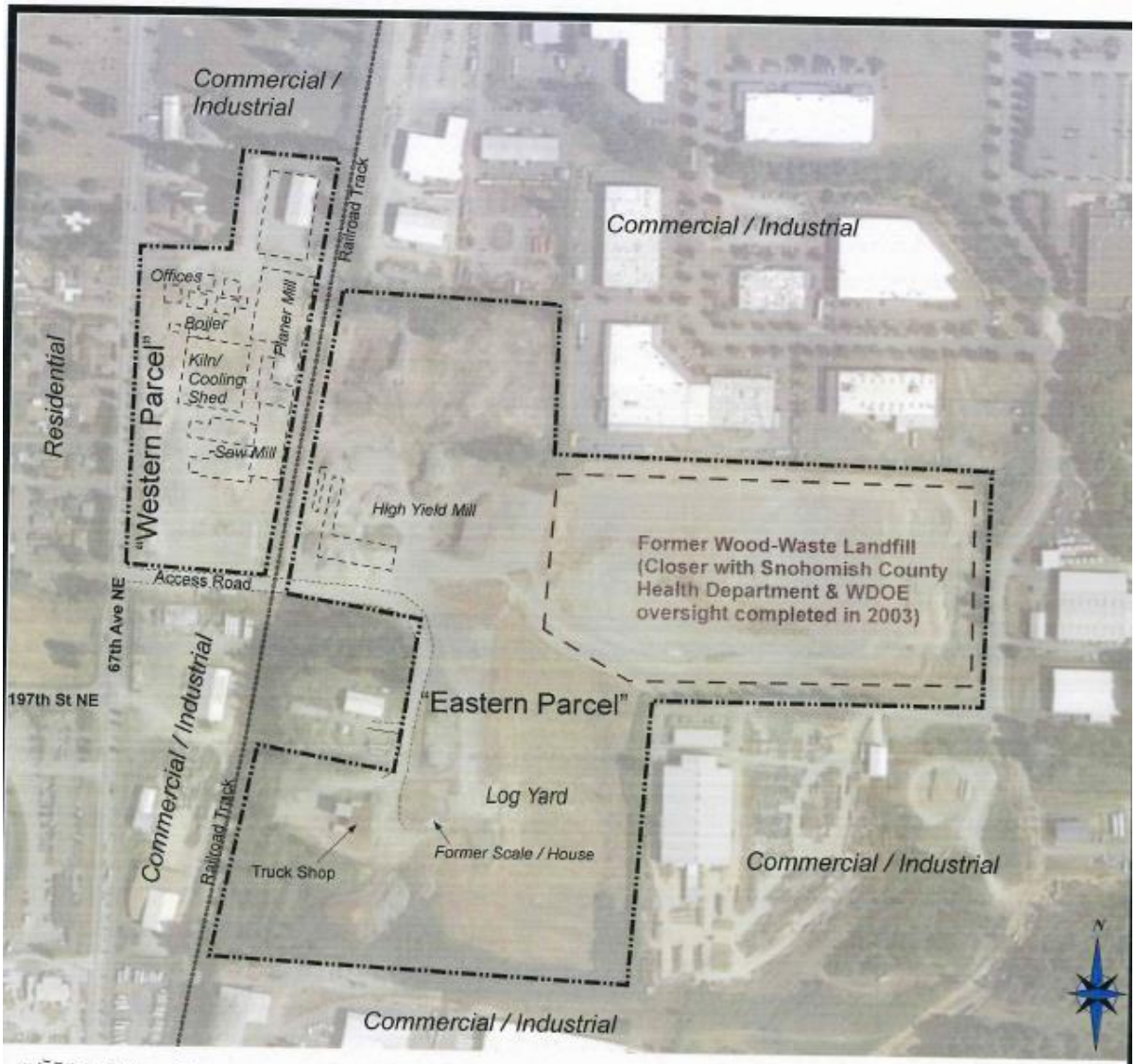


Figure 2: Property Map



ENVIRONMENTAL ASSOCIATES, INC. 1380 112th Avenue N.E., Ste. 300 Bellevue, Washington 98004	**AREA OVERVIEW** Gayteway Development (Former Northwest Hardwoods) 20015 - 67th Avenue NE Arlington, Washington		
Job Number: JN-39104-5	*Date:* February 2020	*Scale:*	*Plate:* 2

Figure 3: Western Parcel Detail Map

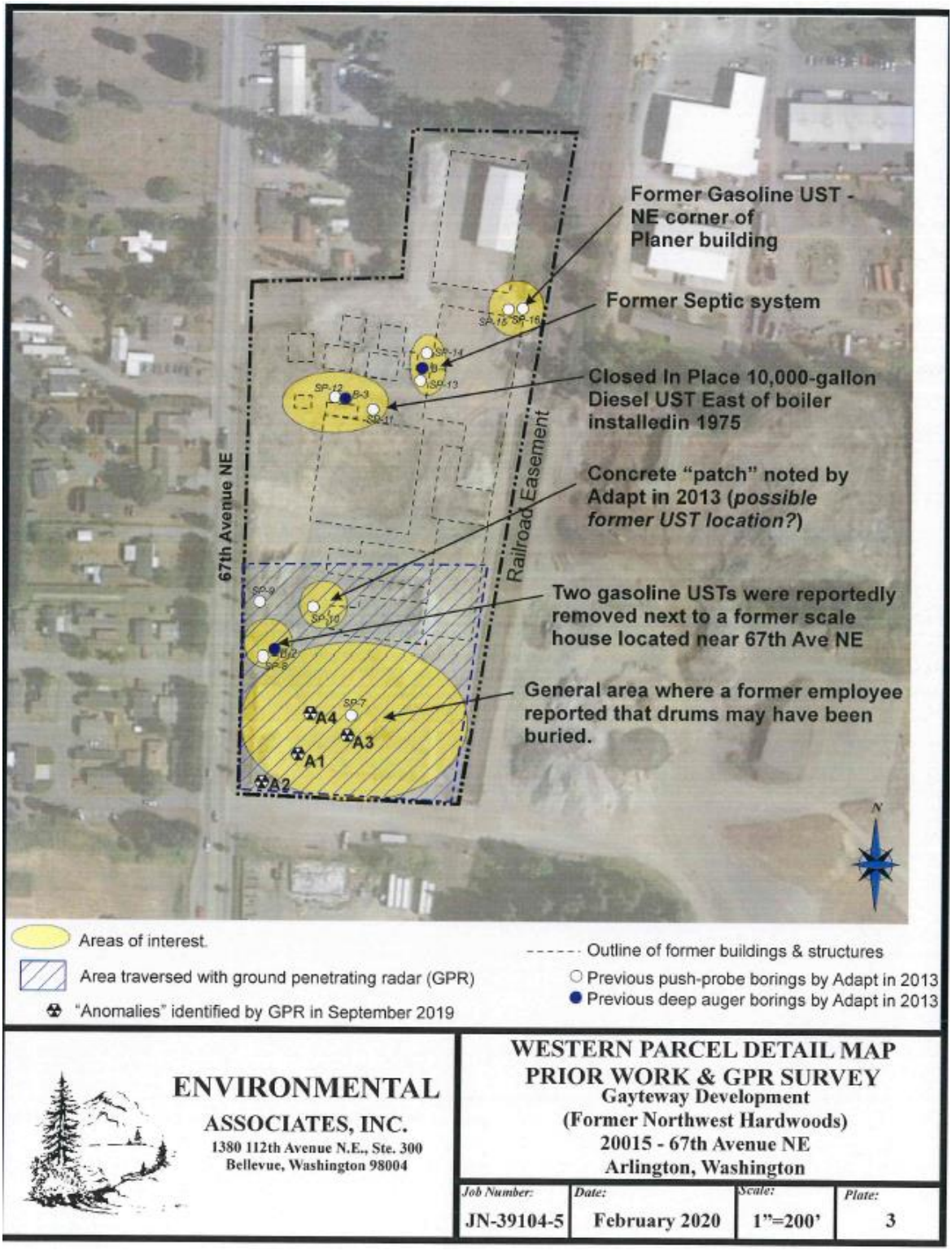


Figure 4: Western Parcel Excavation and Sampling Map

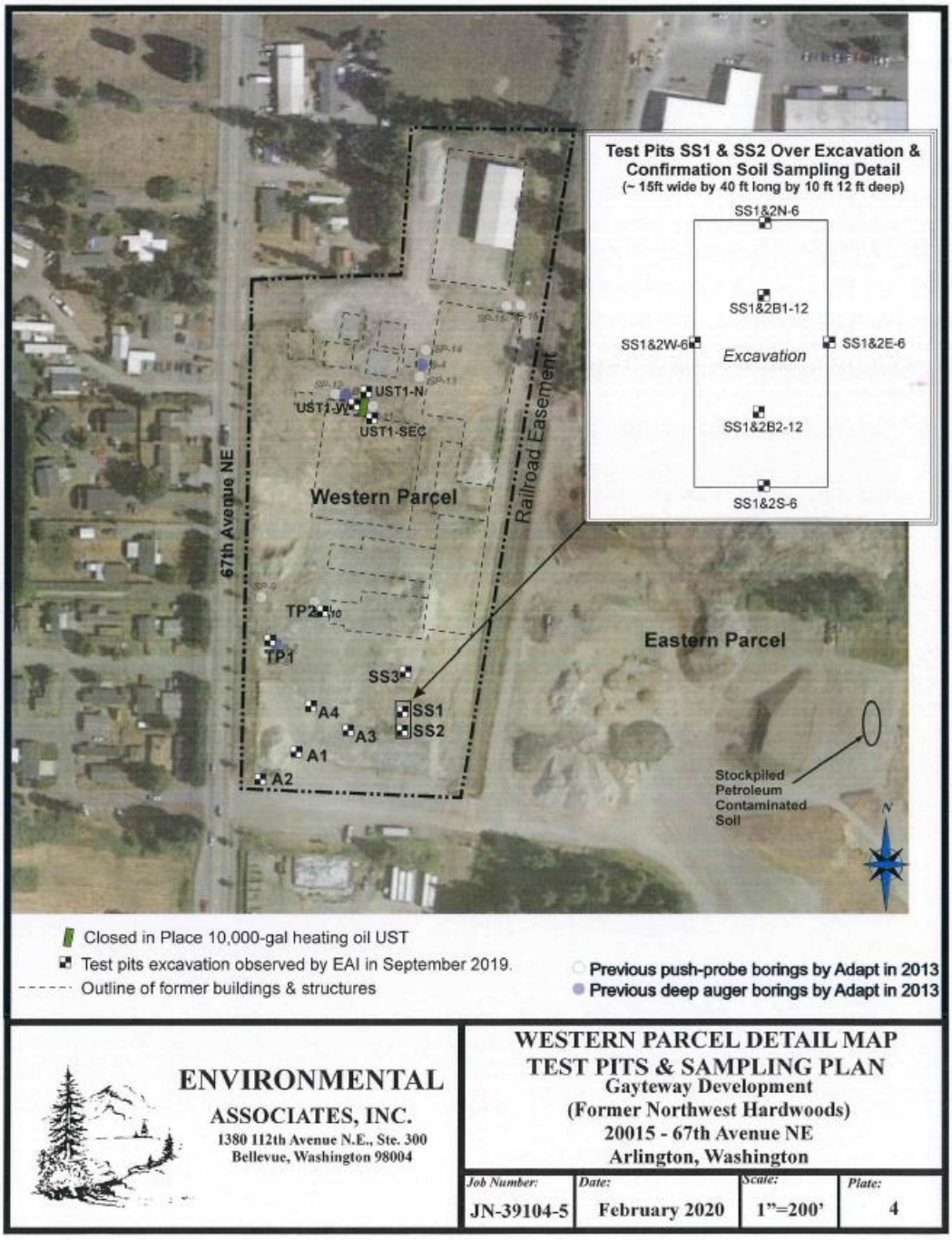


Figure 5: Eastern Parcel Detail Map

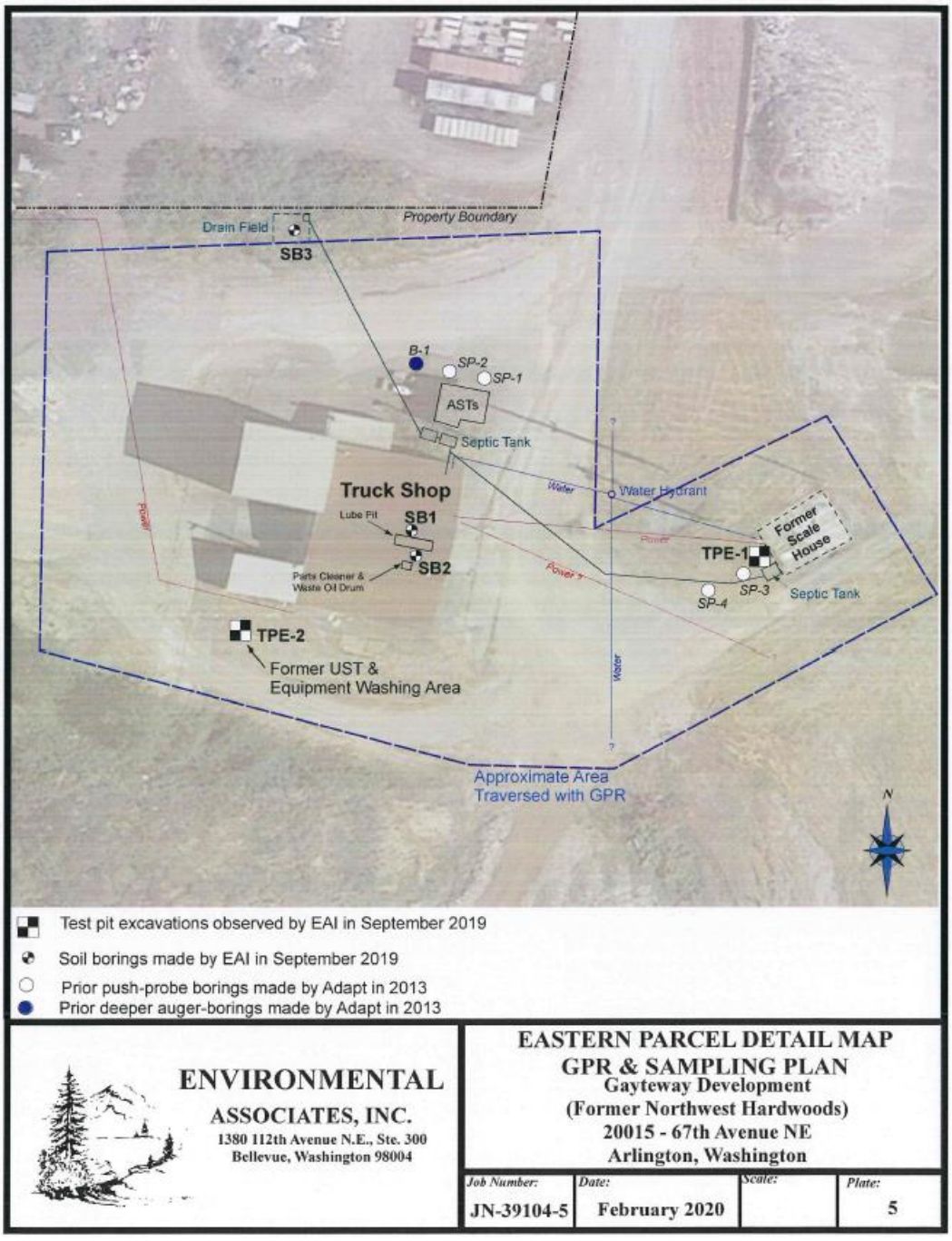


Figure 6: Letter from Snohomish County Health Department

SNOHOMISH HEALTH DISTRICT

ENVIRONMENTAL HEALTH DIVISION
3020 Rucker Avenue, Suite 104
Everett, WA 98201-3900
425.339.5250 FAX: 425.339.5254

Healthy Lifestyles, Healthy Communities

June 18, 2003

B.J. Nersten
Northwest Hardwoods
P. O. Box 7
Arlington, Washington 98223-0007

Subject: Successful Removal of the Northwest Hardwoods Woodwaste Landfill, Located at 20015 67th NE, Arlington, Washington.

Dear Mr. Nersten:

On May 7, 2003 Snohomish Health District received a letter from your office stating that the landfill reclamation project had been completed. The letter stated that all the original landfill material had been excavated and processed. On May 13, 2003 Mike Young and Aran Enger evaluated several soil logs and at that time it appeared that all of the woodwaste material had been removed. Thank you for your work in removing the Northwest Hardwood Woodwaste Landfill. Our records will indicate that your site is a closed landfill that does not contain woodwaste.

If you have any questions please call me at 425.339.5250.

Sincerely,

Aran Enger, R.S.
Environmental Health Specialist

AE:jsf

Table A1: Soil Sampling Results - Exploration

Gayteway, LLC *JN-39104-5*

TABLE 1 - Petroleum & BTEX - Soil Sampling Results
All results and limits in parts per million (ppm)

Sample Name	Location / Comment	Gasoline (TPH)	Diesel (TPH)	Heavy Oil (TPH)	Benzene	Toluene	Ethylbenzene	Total Xylenes
Western Parcel Exploration Samples								
A1-6	GPS Anomaly A1	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
A2-6	GPS Anomaly A2	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
A3-9	GPS Anomaly A3	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
A4-8	GPS Anomaly A4	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
UST1-N-10	Closed-in-place UST	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
UST1-SEC-10	Closed-in-place UST	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
UST1-W-10	Closed-in-place UST	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
TP1-9	Scale House UST Area	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
TP2-8	Former "patch" Area	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
SS1-3	Test Pit SS1 Interim Sample	<5	***5,700***	***13,000***	<0.02	<0.02	<0.02	<0.06
SS1-5	Test Pit SS1 Interim Sample	<5	95	590	<0.02	<0.02	<0.02	<0.06
SS1-7	Test Pit SS1 Interim Sample	<5	170	840	<0.02	<0.02	<0.02	<0.06
SS2-3	Test Pit SS2 Interim Sample	<5	1,900	***10,000***	<0.02	<0.02	<0.02	<0.06
SS2-4	Test Pit SS2 Interim Sample	<5	1,700	***9,500***	<0.02	<0.02	<0.02	<0.06
SS2-10	Test Pit SS2 Interim Sample	<5	330	2,000	<0.02	<0.02	<0.02	<0.06
SS3-6	Test Pit SS3	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
SS3-10	Test Pit SS3	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
Eastern Parcel Exploration Samples								
TPE1-6	Former Scale House Septic Tank	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
TPE2-4	Former UST / Wash Pad Area	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
TPE2-12	Former UST / Wash Pad Area	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
SB1-8	Lube Pit - North Side	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
SB1-16	Lube Pit - North Side	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
SB2-4	Lube Pit - South Side & Parts Washer	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
SB2-12	Lube Pit - South Side & Parts Washer	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
SB2-16	Lube Pit - South Side & Parts Washer	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
SB3-4	Septic Drain Field	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
SB3-12	Septic Drain Field	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
SB3-16	Septic Drain Field	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
Reporting Limit [3]		10	50	100	0.02	0.05	0.05	0.15
WDOE Compliance Levels [4]		**30** [5]	**2000**	**2000**	**0.03**	**7**	**6**	**9**

Notes:
1- "ND" denotes analytes not detected at or above listed Reporting Limit.
2- "---" denotes sample not analyzed for specific analyte.
3- "Reporting Limit" represents the laboratory lower quantitation limit.
4- Method A soil cleanup levels as published in the Model Toxics Control Act (MTCA) 173-340-WAC.
5- The MTCA gasoline TPH cleanup level is 100 ppm for soils with no benzene and less than 20% aromatic hydrocarbons between C8 and C16. Otherwise, the cleanup level is 30 ppm.
6- Samples analyzed for volatile organic compounds (VOCs) by EPA 8260. See attached lab report for a list of all compounds analyzed for along with corresponding laboratory reporting limits.

Bold and Italics denotes concentrations above MTCA Method A soil cleanup levels.

Table A2: Soil Sampling Results – Carcinogenic PAH's

Gayteway, LLC. *JN-39104-5*

TABLE 2 - Carcinogenic PAHs - Soil Sampling Results
All results and limits in parts per million (ppm)

Sample Name	Benzo(a)pyrene	Chrysene	Dibenzo(a,h)anthracene	Indeno(1,2,3,-cd)pyrene	Benzo(k)fluoranthene	Benzo(a)anthracene	Benzo(b)fluoranthene	Total Carcinogenic PAHs[5]
Western Parcel Exploration Samples								
A1-6	0	0	0	0	0	0	0	***0.00***
A2-6	0	0	0	0	0	0	0	***0.00***
A3-9	0	0	0	0	0	0	0	***0.00***
A4-8	0	0	0	0	0	0	0	***0.00***
TP1-9	0	0	0	0	0	0	0	***0.00***
TP2-8	0	0	0	0	0	0	0	***0.00***
SS1-5	0	0	0	0	0	0	0	***0.00***
SS2-3	0	0.02	0	0	0	0	0	***0.0002***
SS3-6	0	0	0	0	0	0	0	***0.00***
Eastern Parcel Exploration Samples								
TPE1-6	0	0	0	0	0	0	0	***0.00***
TPE2-4	0	0	0	0	0	0	0	***0.00***
SB2-4	0	0	0	0	0	0	0	***0.00***
SB2-12	0	0	0	0	0	0	0	***0.00***
SB3-4	0	0	0	0	0	0	0	***0.00***
SB3-12	0	0	0	0	0	0	0	***0.00***
cPAH Toxicity Equivilant Fraction [5]	1.0	0.01	0.1	0.1	0.1	0.1	0.1	
Reporting Limit [3]	0.01	0.01	0.01	0.01	0.01	0.01	0.01	
MTCA-Method-A Residential [4]	---	---	---	---	---	---	---	0.1
MTCA-Method-A Industrial [4]	---	---	---	---	---	---	---	2

Notes:
1- "0" denotes analyte not detected at or above listed Reporting Limit.
2- "NA" denotes sample not analyzed for specific analyte.
3- "Reporting Limit" represents the laboratory lower quantitation limit.
4- Method A soil cleanup level for total carcinogenic PAHs as published in the Model Toxics Control Act (MTCA) 173-340-WAC.
5- Total carcinogenic PAHs are calculated by suming the product of each cPAH mulitplied by its toxicity equivalency fraction per WAC 173-340-708(8).

Bold and Italics denotes concentrations above existing MTCA Method A soil cleanup levels.

Table A3: Soil Sampling Results – Other PAH's and Semi-Volatiles

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TABLE 3 - Other PAHs & Semi-Volatiles- Soil Sampling Results
All results and limits in parts per million (ppm)

Sample Name	Naphthalene	Acenaphthene	Fluorene	Anthracene	Fluoranthene	Pyrene
Western Parcel Exploration Samples						
A1-6	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
A2-6	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
A3-9	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
A4-8	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
TP1-9	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
TP2-8	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
SS1-5	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
SS2-3	<0.01	<0.01	<0.01	<0.01	<0.01	0.014
SS3-6	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
Eastern Parcel Exploration Samples						
TPE1-6	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
TPE2-4	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
SB2-4	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
SB2-12	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
SB3-4	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
SB3-12	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
Reporting Limit [3]	0.01	0.01	0.01	0.01	0.01	0.01
Cleanup Level for Unrestricted Land Use (Method-A)[4]	5	---	---	---	---	---
Cleanup Level - Direct Contact (Method-B)[5]	1600	4800	3200	24000	3200	2400
Cleanup Level - Protection of Groundwater (Method-B)[6]	4.46	105	101	1140	631	655

Notes:
1 - "ND" denotes analyte not detected at or above listed Reporting Limit.
2- "NA" denotes sample not analyzed for specific analyte.
3- "Reporting Limit" represents the laboratory lower quantitation limit.
4- Method A soil cleanup levels for unrestricted land use as published in the Model Toxics Control Act (MTCA) 173-340-WAC, Table 740-1. Amended February 12, 2001.
5- Method-B soil cleanup levels for the "direct contact pathway", as published in Ecology's CLARC version 3.0, August 2001 database.
6- Method-B soil cleanup level for the protection of groundwater based upon the Method-B groundwater cleanup levels. Values as published in Ecology's CLARC version 3.0, August 2001, database.

Bold and Italics denotes concentrations above existing MTCA Method A soil cleanup levels.

Table A4: Soil Sampling Results – PCB's

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TABLE 4 - PCBs - Soil Sampling Results
All results and limits in parts per million (ppm)

Sample	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Arochlor 1260	Arochlor 1262	Total PCBs
Western Parcel Exploration Samples									
SS1-3	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	0.0
SS1-5	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	0.0
SS2-3	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	0.0
SS3-6	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	0.0
Eastern Parcel Exploration Samples									
TPE1-6	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	0.0
TPE2-4	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	0.0
SB2-4	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	0.0
SB2-12	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	0.0
SB3-4	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	0.0
SB3-12	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	0.0
Reporting Limit [3]	0.02	0.02	0.02	0.02	0.02	0.02	0.02	0.02	---
Existing Cleanup Level[4]	---	---	---	---	---	---	---	---	1 (A)

Notes:
1 - "ND" denotes analyte not detected at or above listed Reporting Limit.
2- "NA" denotes sample not analyzed for specific analyte.
3- "Reporting Limit" represents the laboratory lower quantitation limit.
4- Method A soil cleanup level for total PCB mixtures as published in the Model Toxics Control Act (MTCA) 173-340-WAC.

Bold and Italics denotes concentrations above existing MTCA Method A soil cleanup levels.

Table A5: Soil Sampling Results - Metals

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TABLE 5 - RCRA-8 Metals - Soil Sampling Results
All results and limits in parts per million (ppm)

Sample Name	Arsenic	Barium	Cadmium	Chromium	Lead	Mercury	Selenium	Silver
Western Parcel Exploration Samples								
A1-6	3.79	52.1	<1	24.4	3.59	<1	<1	<5
A2-6	3.06	45.4	<1	24.2	3.06	<1	<1	<5
A3-9	3.29	49.7	<1	32.4	3.49	<1	<1	<5
A4-8	3.24	44.0	<1	28.0	2.69	<1	<1	<5
TP1-9	4.12	42.1	<1	40.5	4.36	<1	<1	<5
TP2-8	3.11	68.7	<1	22.9	2.97	<1	<1	<5
SS1-5	3.33	28.9	<1	38.0	3.99	<1	<1	<5
SS2-3	3.93	62.4	<1	25.9	3.08	<1	<1	<5
SS3-6	3.22	45.8	<1	26.6	2.91	<1	<1	<5
Eastern Parcel Exploration Samples								
TPE1-6	<5	46.3	<1	22.7	2.77	<1	<1	<1
TPE2-4	<5	25.4	<1	18.2	4.53	<1	<1	<1
SB2-4	<5	33.5	<1	19.4	2.53	<1	<1	<1
SB2-12	<5	38.3	<1	23.7	4.02	<1	<1	<1
SB3-4	<5	24.7	<1	19.5	2.91	<1	<1	<1
SB3-12	<5	31.4	<1	18.5	2.57	<1	<1	<1
Reporting Limit [3]	1 / 5	1	1	1	1	1	1	1 / 5
Existing Cleanup Level [4]	20 (A)	16,000 (B)	2 (A)	2000 (A) [5]	250 (A)	2 (A)	400 (B)	400 (B)

Notes:
1 - "ND" denotes analyte not detected at or above listed Reporting Limit.
2- "NA" denotes sample not analyzed for specific analyte.
3- "Reporting Limit" represents the laboratory lower quantitation limit.
4- Method A or B cleanup levels as published in the Model Toxics Control Act (MTCA) 173-340-WAC.
5- The Method A target compliance level for for the more common form of chromium (chromium III) is 2,000 ppm.
The target compliance level for the less common chromium VI is 19 ppm. Chromium VI is not generally suspected at this type of facility.

Bold and Italics denotes concentrations above existing MTCA Method A soil cleanup levels.

Table A6: Soil Sampling Results – Chlorinated Volatile Organic Compounds

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TABLE 6 - Chlorinated VOCs - Soil Sampling Results
All results and limits in parts per million (ppm)

Sample Name	Tetrachloroethene (PCE)	Trichloroethene (TCE)	(cis) 1,2 Dichloroethene	(trans) 1,2 Dichloroethene	Vinyl Chloride
Western Parcel Exploration Samples					
A1-6	<0.025	<0.02	<0.05	<0.05	<0.05
A2-6	<0.025	<0.02	<0.05	<0.05	<0.05
A3-9	<0.025	<0.02	<0.05	<0.05	<0.05
A4-8	<0.025	<0.02	<0.05	<0.05	<0.05
TP1-9	<0.025	<0.02	<0.05	<0.05	<0.05
TP2-8	<0.025	<0.02	<0.05	<0.05	<0.05
SS1-5	<0.025	<0.02	<0.05	<0.05	<0.05
SS2-3	<0.025	<0.02	<0.05	<0.05	<0.05
SS3-6	<0.025	<0.02	<0.05	<0.05	<0.05
Eastern Parcel Exploration Samples					
TPE1-6	<0.025	<0.02	<0.05	<0.05	<0.05
TPE2-4	<0.025	<0.02	<0.05	<0.05	<0.05
SB2-4	<0.025	<0.02	<0.05	<0.05	<0.05
SB2-12	<0.025	<0.02	<0.05	<0.05	<0.05
SB3-4	<0.025	<0.02	<0.05	<0.05	<0.05
SB3-12	<0.025	<0.02	<0.05	<0.05	<0.05
Reporting Limit [3]	0.025	0.02	0.05	0.05	0.05
WDOE Compliance Level (Method-A)[4]	**0.05**	**0.03**	---	---	---
WDOE Compliance Level (Method-B - Ingestion)[5]	**476**	**12**	**160**	**1,600**	**0.67**

Notes:
1 - "ND" denotes analyte not detected at or above listed Reporting Limit.
2- "NA" denotes sample not analyzed for specific analyte.
3- "Reporting Limit" represents the laboratory lower quantitation limit.
4- Washington State Department of Ecology (WDOE) Method A target compliance levels for unrestricted land use and protection of groundwater through soil leaching pathway, as published in the WDOE's CLARC database (May 2014).
5- Method-B soil compliance levels for the "direct contact (ingestion) pathway", as published in Ecology's CLARC database. Method-B compliance levels apply where Method-A levels have not been estiablished. Method-B compliance levels for direct contact are not intended to be protective of groundwater resources.

Bold and Italics denotes concentrations above existing MTCA Method A or B soil cleanup levels.

Table A7: Soil Sampling Results – Confirmation Samples

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TABLE 7 - Cleanup Confirmation Soil Sampling Results
All results and limits in parts per million (ppm)

Sample Name	Location / Comment	Gasoline (TPH)	Diesel (TPH)	Heavy Oil (TPH)	Benzene	Toluene	Ethylbenzene	Total Xylenes
SS1&2B1-12	Excavation Base	---	<50	<250	---	---	---	---
SS1&2B2-12	Excavation Base	---	<50	<250	---	---	---	---
SS1&2E-6	East Side Wall	---	<50	<250	---	---	---	---
SS1&2S-6	South Side Wall	---	<50	<250	---	---	---	---
SS1&2N-6	North Side Wall	---	<50	<250	---	---	---	---
SS1&2W-6	West Side Wall	---	<50	<250	---	---	---	---
Reporting Limit [3]		10	50	100	0.02	0.05	0.05	0.15
WDOE Compliance Levels [4]		**30** [5]	**2000**	**2000**	**0.03**	**7**	**6**	**9**

Notes:
1- "ND" denotes analytes not detected at or above listed Reporting Limit.
2- "---" denotes sample not analyzed for specific analyte.
3- "Reporting Limit" represents the laboratory lower quantitation limit.
4- Method A soil cleanup levels as published in the Model Toxics Control Act (MTCA) 173-340-WAC.
5- The MTCA gasoline TPH cleanup level is 100 ppm for soils with no benzene and less than 20% aromatic hydrocarbons between C8 and C16. Otherwise, the cleanup level is 30 ppm.
6- Samples analyzed for volatile organic compounds (VOCs) by EPA 8260. See attached lab report for a list of all compounds analyzed for along with corresponding laboratory reporting limits.

Bold and Italics denotes concentrations above MTCA Method A soil cleanup levels.