

Memorandum

February 12, 2021

Re:	Opportunistic Soil and Groundwater Results: Carson Cleaners, Inc.
CC:	Clara Chen and Hubert Chen, Tahn Associates, LLC
From:	Stephen Strehl; Halah Voges, PE; and Nathan Soccorsy
То:	Dale Myers, Washington State Department of Ecology

1 Introduction

This memorandum reports the results of select subsurface soil and reconnaissance groundwater testing conducted on behalf of Tahn Associates (Tahn), the current owner of the property located at 4701 Brooklyn Avenue NE in Seattle, Washington (Figure 1). The property was formerly operated as a dry cleaner under the name Carson Cleaners, Inc. (Carson Cleaners).

Chlorinated volatile organic compounds (CVOCs) were discovered during environmental cleanup of the former Chevron gas station (Site ID: 90129). Following the discovery of CVOCs at the former gas station site, the Washington State Department of Ecology (Ecology) issued a letter dated November 7, 2019 (Appendix A) to neighboring property owners, including Tahn, to investigate potential vapor intrusion (VI) risk at their properties.

Concurrent with the VI work, Anchor QEA opportunistically installed a single direct push reconnaissance well in the southeast corner of the former Carson Cleaners parking lot, as shown in Figure 2. During installation, select vadose and saturated soil samples were collected and submitted for chemical analysis, followed by two rounds of groundwater reconnaissance sampling. This memorandum summarizes the field work conducted to install the well, the selection of soil samples for analysis, data quality review of the analytical results, and the results of the soil and groundwater testing.

2 Field Activities

This section describes the well installation process, selection of soil intervals for testing, and groundwater monitoring events.

2.1 Utility Clearance

On July 20, 2020, prior to the well installation, APS Locators, a professional underground utility locator licensed in the state of Washington, used ground-penetrating radar and passive utility-locating devices to check for underground utilities and clear the location for drilling.

Based on the location of identified utilities on site and monitoring wells on adjacent or nearby properties, the proposed boring location was selected on the southeast side of the property in the parking lot (Figure 2).

2.2 Soil Sampling, Monitoring Well Installation, and Development

On July 24, 2020, at the direction of Anchor QEA's field geologist, Holt Services, Inc., advanced a soil boring using a Geoprobe drill rig.

The boring was advanced to 30 feet below ground surface (bgs). Soils collected were visually inspected and field screened with a 11.7 eV lamp photoionization detector (PID) by the Anchor QEA field geologist. Four soil samples were collected from the soil boring based on field screening with a PID; two samples above the groundwater table and two samples below the groundwater table were collected. Samples were collected directly into pre-cleaned, laboratory-provided sample jars using stainless-steel spoons and/or a disposable U.S. Environmental Protection Agency (EPA) Method 5035 syringe (for CVOC analysis). The groundwater monitoring well was installed following the completion of the soil boring.

The observed lithology consists of approximately 13 feet of gravelly sand fill-like material, followed by a layer of poorly graded sand that appeared to be a native contact. Below the poorly graded sand is a silty sand unit extending to 25 feet bgs. Another poorly graded sand layer follows the silty sand, and below the poorly graded sand, a gravelly sand extends to the end of the boring. The observed water level at time of drilling was found at 22 feet bgs in the silty sand unit. A boring log is included in Appendix B. Soil samples were collected from 14.5 feet, 18 feet, 24 feet, and 29 feet bgs. Soil samples were analyzed for the following:

- EPA Method 8260C Northwest Total Petroleum Hydrocarbons Method for Gasoline Range Hydrocarbons (NWTPH-Gx)
- EPA Method 8260C Northwest Total Petroleum Hydrocarbons Method for Diesel Range Hydrocarbons (NWTPH-Dx)
- EPA Method 8260C for Volatile Organic Compounds (VOCs)

Well construction details are described below and a well construction log is presented in Appendix C:

- CC-MW-01 was drilled to a total depth of 30 feet bgs, and groundwater was encountered at approximately 22 feet bgs.
- The well was screened from 20 to 30 feet bgs using 0.75-inch-diameter, 0.010-slot Schedule 40 PVC with a pre-pack screen.
- Ecology Well Tag #BMP001.

The newly installed groundwater monitoring well was developed prior to groundwater sampling by purging groundwater from the well casing using a peristaltic pump. Over three well volumes were

removed until the discharged water was visibly clear. The details of the well development are presented in the field forms in Appendix D.

Soil cuttings from the well installation and water from well development were placed in 55-gallon drums, labeled, and stored on site. Drum disposal is pending. The boring location was measured from existing buildings on site and later mapped onto a georeferenced aerial photograph. The coordinates for the sampling location were queried from this aerial photograph.

2.3 Well Sampling

The groundwater monitoring well was sampled twice after installation, the first event on August 14, 2020, and the second event on November 18, 2020. Prior to groundwater sampling, the water level was measured to the nearest 0.01 foot relative to the top of the casing rim using an electronic water meter. Field records of water level measurements are provided in Appendix D.

Groundwater samples were obtained using a peristaltic pump, pumping at 150 milliliters per minute or less through polyethylene tubing placed within the well casing. Water quality parameters were monitored during purging using a YSI Pro DSS water quality meter connected to a flow-through cell. The following water quality parameters were recorded:

- pH
- Specific conductance (in millisiemens per centimeter [mS/cm])
- Temperature (in degrees Celsius)
- Oxidation reduction potential (ORP) (in millivolts [mV])
- Turbidity (in Nephelometric Turbidity Units [NTU])

Groundwater samples were obtained after ambient groundwater conditions were reached, such that specific conductance and turbidity were stable for three successive readings (i.e., the readings were within +/- 10%). Final water quality parameter readings are included with complete field records of water quality parameters in Appendix D.

Groundwater samples were collected directly into pre-cleaned laboratory-provided bottles after water quality parameters stabilized. The samples were subsequently placed in a cooler on ice and kept under standard chain-of-custody protocols until delivered to the analytical laboratory. All groundwater samples were analyzed for the following:

- EPA Method 8260C for NWTPH-Gx
- EPA Method 8260C for NWTPH-Dx
- EPA Method 8260C for VOCs

Samples were shipped via FedEx overnight under standard chain-of-custody procedures to ALS Environmental in Kelso, Washington.

3 Data Quality Assessment

All soil and groundwater data were validated according to Level 2A (USEPA 2009) guidelines by Anchor QEA. All laboratory quality control sample results were within laboratory control limits. Data qualifiers were applied to the data during final validation as applicable. One trip blank associated with the groundwater sample collected on August 14, 2020, was rejected based on validation results; however, sample data are considered acceptable as reported and usable as qualified. Refer to the three data validation reports included in Appendix F for more information.

4 Analytical Results

This section summarizes the investigation soil and groundwater results. The sampling location is depicted on Figures 2 and 3, and data are presented in Tables 1 and 2. All laboratory reports are included in Appendix E.

4.1 Soil Testing Results

Analytical results are presented in Table 1, and soil concentrations exceeding Model Toxics Control Act (MTCA) Method A Soil Screening Levels are presented in Figure 2. Laboratory data reports are included in Appendix E, and the data validation reports are included in Appendix F. Key findings were as follows:

- Tetrachloroethene (PCE) was detected in all four soil samples at concentrations ranging from 2,300 to 13,000 micrograms per kilogram (µg/kg), all exceeding the MTCA Method A Soil Screening Level for Unrestricted Land Use (50 µg/kg).
- Trichloroethene (TCE) was detected in the soil samples collected below the water table at concentrations of 6.3 µg/kg and 25 µg/kg, respectively, below the MTCA Method A Soil Screening Level for TCE (30 µg/kg).
- No other VOCs were detected above the laboratory reporting limit in any sample.
- Gasoline-range hydrocarbons were detected in the saturated zone at a concentration of 11 milligrams per kilogram (mg/kg) in the sample collected from 29 feet bgs. This result does not exceed the MTCA Method A Soil Screening Level for Unrestricted Land use (30 mg/kg). No other petroleum hydrocarbons were detected above the laboratory reporting limit in any sample.

4.2 Groundwater Testing Results

Analytical results are presented in Table 2 and groundwater concentrations exceeding MTCA Method A Groundwater Screening Levels are presented in Figure 3. Laboratory data reports are included in Appendix E, and the data validation reports are included in Appendix F. Key findings were as follows:

• Gasoline-range hydrocarbons were detected during both monitoring events (August 14 and November 18, 2020) at concentrations of 1.86 and 2.05 milligrams per liter (mg/L),

respectively. Both of these results exceed the MTCA Method A Groundwater Screening Level of 0.8 mg/L. No other petroleum hydrocarbons were detected above the laboratory reporting limit in any sample.

PCE and TCE were detected during both monitoring events (August 14 and November 18, 2020) at concentrations ranging from 2,100 to 2,700 µg/L and 100 to 140 µg/L, respectively. All detections exceed MTCA Method A Groundwater Screening Levels of 5 µg/L for both PCE and TCE. No other VOCs were detected above the laboratory reporting limit in any sample.

5 Reference

EPA (U.S. Environmental Protection Agency), 2009. *Guidance for Labeling Externally Validated Laboratory Analytical Data for Superfund Use*, USEPA Office of Solid Waste and Emergency Response, EPA 540-R-08-005; OSWER 9200.1-85, January 2009.

Tables

Table 1 Soil Testing Results

	Location ID	CC-MW-01	CC-MW-01	CC-MW-01	CC-MW-01	CC-MW-01
	Sample ID	CC-MW-01-124-072420	CC-MW-01-14.5-072420	CC-MW-01-18-072420	CC-MW-01-24-072420	CC-MW-01-29-072420
	Sample Date	7/24/2020 11:30	7/24/2020 10:55	7/24/2020 11:10	7/24/2020 11:25	7/24/2020 11:40
	Depth	24 - 24 ft	14.5 - 14.5 ft	18 - 18 ft	24 - 24 ft	29 - 29 ft
	Sample Type	FD	N	N	N	Ν
	Matrix	SO	SO	SO	SO	SO
	х	-122.3144222	-122.3144222	-122.3144222	-122.3144222	-122.3144222
	Y	47.6632	47.6632	47.6632	47.6632	47.6632
	MTCA Method A Soil					
Chemical	Unrestricted					
Conventional Parameters (%)						
Total Solids		82.5	92.4	85.1	82.1	85
Volatile Organics (µg/kg)						
1,2-Dichloroethene, cis-		5.9 U	5.8 U	5.9 U	6.4 U	6.1 U
1,2-Dichloroethene, trans-		5.9 U	5.8 U	5.9 U	6.4 U	6.1 U
Tetrachloroethene (PCE)	50	4200	2600	2300	3100	13000
Trichloroethene (TCE)	30	6.3	5.8 U	5.9 U	6.4 U	25
Vinyl chloride		5.9 U	5.8 U	5.9 U	6.4 U	6.1 U
Total Petroleum Hydrocarbons (mg/kg)						
Diesel range hydrocarbons	2000	31 U	27 U	30 U	31 U	30 U
Gasoline range hydrocarbons	30	6.7 U	6.4 U	6.8 U	6.9 U	11
Residual range hydrocarbons	2000	130 U	110 U	120 U	130 U	120 U

Notes:

Detected concentration is greater than MTCA Method A Soil Unrestricted screening level

Bold: Detected result

µg/kg: micrograms per kilogram

FD: field duplicate

mg/kg: milligrams per kilogram

MTCA: Model Toxics Control Act

N: normal sample

SO: soil

U: Compound analyzed for, but not detected above detection limit

	Location ID	CC-MW-01	CC-MW-01	CC-MW-01
	Sample ID	CC-MW-01-20200814	CC-MW-01-20201118	CC-MW-1001-20201118
	Sample Date	8/14/2020 15:00	11/18/2020 10:55	11/18/2020 11:00
	Depth			
	Sample Type	N	N	FD
	Matrix	WG	WG	WG
	х	-122.3144222	-122.3144222	-122.3144222
	Y	47.6632	47.6632	47.6632
	MTCA Method A			
Chemical	Groundwater			
Volatile Organics (µg/L)				
1,2-Dichloroethene, cis-		1.3	63	66
1,2-Dichloroethene, trans-		0.50 U	5.0 U	5.0 U
Tetrachloroethene (PCE)	5	2100	2700	2600
Trichloroethene (TCE)	5	100	140	140
Vinyl chloride	0.2	0.50 U	5.0 U	5.0 U
Total Petroleum Hydrocarbons (mg/L)			-	-
Diesel range organics (C12 - C25)	0.5	0.25 U	0.25 U	0.25 U
Gasoline range hydrocarbons	0.8	1.86	2.02	2.05
Residual range organics (C25 - C36)	0.5	0.50 U	0.50 U	0.50 U

Notes:

Detected concentration is greater than MTCA Method A Groundwater screening level

Bold: Detected result

µg/L: micrograms per liter

FD: field duplicate

mg/L: milligrams per liter

MTCA: Model Toxics Control Act

N: normal sample

U: Compound analyzed for, but not detected above detection limit

WG: groundwater

Figures



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Figure 1 **Vicinity Map** Soil and Groundwater Testing Memorandum Carson Cleaners Facility



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Figure 2 Soil Analytical Exceedance Map

Soil and Groundwater Testing Memorandum Carson Cleaners Facility



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Figure 3 Groundwater Analytical Exceedance Map

Soil and Groundwater Testing Memorandum Carson Cleaners Facility Appendix A Ecology Letter (November 2019)



STATE OF WASHINGTON DEPARTMENT OF ECOLOGY

Northwest Regional Office • 3190 160th Ave SE • Bellevue, WA 98008-5452 • 425-649-7000 711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

November 7, 2019

Clara Chen Tahn Associates, LLC 644 164th Place NE Bellevue, WA 98008

Re: Request for Evaluation of Trichloroethylene Risks at the following Site:

- Site Name: Carson Cleaners
- Site Address: 4701 Brooklyn Ave NE, Seattle, WA 98105
- Facility/Site No.: 15518216
- **CSID No.**: 14878

Dear Clara Chen:

Our records indicate that this Site is contaminated with trichloroethylene (TCE), or with tetrachloroethylene (PCE) that can break down into TCE. TCE is a toxic organic chemical that can volatilize from contaminated soil or groundwater and potentially enter nearby buildings as a vapor. The presence of TCE in indoor air can result in health impacts to building occupants, the most urgent of which are to pregnant women. U.S. EPA has concluded that brief exposures to TCE in air may affect women in the first trimester of pregnancy by increasing the risk of heart malformations to a developing fetus.¹

Ecology's Implementation Memo No. 22 titled "Vapor Intrusion (VI) Investigations and Shortterm Trichloroethene (TCE) Toxicity" (attached) provides important information including indoor air action levels² (Section 4 – Table 1) as well as recommendations (Section 5) for determining whether environmental contamination is causing elevated levels of TCE in indoor air.

¹ See U.S. EPA, August 2014, Office of Solid Waste and Emergency Response Memorandum: Compilation of Information Relating to Early/Interim Actions at Superfund Sites and the TCE IRIS Assessment.

² The short-term indoor air action levels are higher than Ecology's long-term indoor air cleanup levels.

Clara Chen November 7, 2019 Page 2

To protect human health, Ecology requests that:

- 1. Within 30 days from the date of this letter, you provide Ecology with any existing information regarding contamination at the site that you have not already submitted.
 - The only data we have received to date has been collected as part of investigations on the adjacent Chevron 90129 site (Facility/Site No. 8196648, CSID No. 10632). This data includes concentrations of chlorinated solvents, including TCE, in groundwater above cleanup levels.
- 2. Within 60 days, you submit a sampling and analysis plan for your vapor intrusion evaluation to Ecology for review. The goal of your evaluation it to determine whether environmental contamination at the site has resulted in TCE concentrations from vapor intrusion above the short-term indoor air action levels.
 - From the most recent data we have received (see figure below), groundwater contamination above the screening levels in Implementation Memo 22 extends down NE 47th Street to at least University Way NE. This puts multiple residential and commercial buildings within the 100 foot lateral screening distance, the area where there is the greatest risk of exposure to chlorinated solvents via vapor intrusion. All of these buildings should be considered in your evaluation.
 - Your evaluation should include a combination of soil vapor, indoor air, and ambient air sampling. General guidance on conducting a vapor intrusion evaluation including these types of samples is available online at: https://fortress.wa.gov/ecy/publications/documents/0909047.pdf.
 - We ask that you coordinate with Tim Bishop and Cheryl Cameron of Chevron Environmental Management Company, the project managers for the adjacent Chevron 90129 site, as you develop your sampling and analysis plan. They are copied on this letter, and may be reached via email at TimBishop@chevron.com and Cheryl.Cameron@chevron.com.
- 3. Within 90 days, you conduct sampling and submit the results of your evaluation to Ecology. Include recommendations on what actions, if any, are necessary to reduce TCE concentrations to below the appropriate short-term indoor air action level.
 - Multiple rounds of sampling may be necessary to complete the short-term TCE investigation. If that is that case, we expect that the first round of sampling will be completed within 90 days, and that a schedule for any additional sampling will be included in the sampling and analysis plan.

Clara Chen November 7, 2019 Page 3

Ecology's Next Steps:

Depending on the site specific circumstances, Ecology may:

- 1. Continue to provide technical assistance as necessary for evaluating and/or remediating short-term TCE risks.
- 2. Notify appropriate local, state or Federal health agencies to discuss possible health risks and any necessary public notifications.
- 3. Identify potentially liable parties and require additional remedial action pursuant to RCW 70.105D, such as: a) issuing an enforcement order, b) pursuing an Ecology conducted cleanup with cost recovery, or c) seeking judicial review.
- 4. Pursue other options necessary to adequately cleanup contamination at the site.

Contact Information

Ecology is committed to working with you to accomplish the prompt and effective actions necessary at the Site. If you have any questions about this request, please contact me at (425) 649-7040 or kim.wooten@ecy.wa.gov.

Sincerely,

Kim Worth

Kim Wooten Toxicologist Toxics Cleanup Program, Northwest Regional Office

Enclosure: Implementation Memo No. 22

By certified mail: 9171 9690 0935 0136 9544 72

cc: Steve Chianglin, Chianglin Law Firm PLLC Allyson Bazan, Assistant Attorney General Dale Myers, Ecology Eric Hetrick, Chevron Environmental Management Company Cheryl Cameron, Chevron Environmental Management Company Tim Bishop, Chevron Environmental Management Company





Vapor Intrusion (VI) Investigations and Short-term Trichloroethene (TCE) Toxicity

Implementation Memorandum No. 22

Date:	October 1, 2019
To:	Interested Persons
From:	Jeff Johnston, Section Manager Information & Policy Section Toxics Cleanup Program
Contact:	Policy & Technical Support Unit, Headquarters, Lacey, WA
Attachments:	A - Response to comments on the November 21, 2018, review draft of this memo.

Accommodation Requests: To request ADA accommodation including materials in a format for the visually impaired, call Ecology at 800-826-7716. Persons with impaired hearing may call Washington Relay Service at 711. Persons with speech disability may call TTY at 877-833-6341.

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Acronyms and Abbreviations

Acronym or	Definitions
Abbreviation	
APU	air purification units
ATSDR	Agency for Toxic Substances and Disease Registry
CLARC	Ecology's Cleanup Levels and Risk Calculation data tables
COPC	contaminant of potential concern
CPF	carcinogenic potency factor
CSM	(vapor intrusion) Conceptual Site Model
DoD	United States Department of Defense
DTSC	California Department of Toxic Substances Control
Ecology	Washington State Department of Ecology
EPA	United States Environmental Protection Agency
HI	non-carcinogenic Hazard Index
HQ	non-carcinogenic Hazard Quotient
HVAC	heating, ventilation, and air conditioning
IRIS	EPA's Integrated Risk Information System
µg/l	micrograms per liter
µg/m³	micrograms per cubic meter
MTCA	Model Toxics Control Act
NAPL	non-aqueous phase liquids
QA	quality assurance
RCW	Revised Code of Washington
RfD	reference dose
RI	Remedial Investigation
RME	reasonable maximum exposure (RME) means the highest exposure
	that can be reasonably expected to occur for a human or other living
	organisms at a site under current and potential future site use
SAP	Sampling and Analysis Plan
SL	screening level
TCE	trichloroethene or trichloroethylene
TCP	Toxics Cleanup Program
Tier I	term used in Ecology's 2009 draft VI guidance to describe VI
	assessments employing subsurface (groundwater and soil gas) VOC
	measurements
Tier II	term used in Ecology's 2009 draft VI guidance to describe VI
	assessments employing indoor air VOC measurements
µg/l	micrograms per liter
µg/m³	micrograms per cubic meter
VI	vapor intrusion
VOC	volatile organic compound
WAC	Washington Administrative Code

1.0 Purpose and Applicability

The purpose of this memorandum is to supplement the 2009 Draft Vapor Intrusion Guidance¹ produced by the Washington State Department of Ecology (Ecology) and provide recommendations pertaining to cleanup sites contaminated with trichloroethene (TCE).

Specifically, this memorandum:

- 1. Provides indoor air Action Levels that are protective of short-term exposures to TCE.
- 2. Provides the default (non-site-specific) subsurface vapor intrusion (VI) screening levels that are protective of the short-term indoor air TCE action levels.
- 3. Identifies options for effectively and rapidly responding to those situations where TCE concentrations caused by VI in indoor air are above action levels.
- 4. Establishes the goal to keep indoor air TCE concentrations (caused by VI) below shortterm action levels at Model Toxics Cleanup Act (MTCA) cleanup sites in Washington state.
- Provides guidance and recommendations for those scenarios where a) VI-caused TCE indoor air concentrations exceed, or may exceed, the short-term action levels, and b) the building being investigated is regularly occupied by female residents or workers of child-bearing age.

Unless otherwise specified, this document applies to any cleanup site where TCE is a subsurface contaminant of concern and a VI pathway is being, or should be, evaluated. This includes sites under direct Ecology oversight; sites where Ecology is responsible for the investigation and cleanup; and sites in the independent cleanup process. Although the memorandum refers in a number of instances to investigation and outreach activities that assume direct Ecology involvement at the site, when this is not the case (as noted in Section 5.2) the parties performing the site investigation and cleanup should independently complete the recommended steps outlined in the memorandum.²

¹ Draft Guidance for Evaluating Soil Vapor Intrusion in Washington State: Investigation and Remedial Action (Ecology 2009): <u>https://fortress.wa.gov/ecy/publications/SummaryPages/0909047.html.</u>

² In later portions of the memorandum, we use the term "responsible party" to refer to the party who is conducting remedial actions at the site. In many cases the responsible party will be a person meeting the statutory definition of a "potentially liable person" (see <u>RCW 70.105D.040</u>).

<u>WAC 173-340-200</u> of the MTCA rule defines the terms "cleanup," cleanup action," "interim action," and "remedial action." Remedial action (or "remedy") means "any action or expenditure consistent with the purposes of [MTCA statute] <u>Chapter 7.0.105D</u> RCW to identify, eliminate, or minimize any threat posed

NOTE: In some buildings, indoor workers are routinely exposed to elevated indoor air concentrations of volatile organic compounds (VOC) as part of a manufacturing or other business-related process. When the same VOCs are also present in subsurface contamination, these scenarios commonly pose difficulties to investigators who are attempting to quantify VI-only contributions to indoor air contamination. Another challenge: as long as manufacturing or other business-related processes result in indoor VOC levels much higher than those potentially caused by VI, the affected receptors will only minimally benefit from actions taken to curtail just the VI contributions.

Implementation Memorandum No. 22 does not provide guidance or recommendations for scenarios where business-related processes persistently contaminate the building's indoor air with TCE, and the resulting TCE concentrations significantly exceed any VI contributions. If this scenario is (or appears to be) present at the site, Ecology should be consulted before proceeding further with the VI evaluation.³

by hazardous substances to human health or the environment including any investigative and monitoring activities with respect to any release or threatened release of a hazardous substance and any health assessments or health effects studies conducted in order to determine the risk or potential risk to human health."

³ See also Ecology's Implementation Memorandum No. 21: *Frequently Asked Questions (FAQs) Regarding Vapor Intrusion (VI) and Ecology's 2009 Draft VI Guidance* (Ecology 2018b), available at: <u>https://fortress.wa.gov/ecy/publications/SummaryPages/1809046.html</u>

2.0 How this Memo is Organized

When TCE is present in soils, groundwater, or soil gas, VI assessments should determine if indoor air concentrations exceed cleanup levels based on chronic exposure. Assessments should also, however, be designed to determine if indoor air concentrations are higher than action levels protective of toxic, non-cancer effects caused by short-term exposures to the chemical. This memorandum provides guidance and recommendations for such short-term exposure scenarios.

Section 3.0 provides background on the 2009 draft vapor intrusion guidance, and the major updates to the document since.

Section 4.0 identifies Ecology's short-term indoor air action levels. It also includes short-term TCE soil gas and groundwater screening levels, which are calculated to be protective of the indoor air action levels.

Section 5.0 discusses VI investigations at TCE sites, and outlines Ecology's expectations regarding assessments of possible short-term, indoor air TCE, action level exceedances.

Section 6.0 outlines Ecology's expectations regarding appropriate responses and response timeframes, when VI-caused indoor air TCE concentrations exceed action levels.

Section 7.0 describes notifications and other outreach-related tasks that responsible parties should perform at TCE sites where VI may be resulting in indoor air concentrations that exceed action levels.

3.0 Background

In 2009, Ecology prepared the draft VI guidance titled <u>Guidance for Evaluating Soil Vapor</u> <u>Intrusion in Washington State: Investigation and Remedial Action</u>. A public comment period in the fall of 2009 provided an opportunity for the public to review and give us feedback on the draft document. Although a number of public comments were received, Ecology did not formally respond to the comments or revise and finalize the draft guidance. Nevertheless, the draft VI guidance has been relied on by Ecology staff, environmental consultants, and others who are responsible for assessing VI and ensuring that indoor receptors are protected from VIrelated air contamination.

Since 2009, parts of the draft guidance have been updated or otherwise superseded by TCP Implementation Memoranda. Specifically:

<u>Updated and revised VI cleanup and screening levels.</u> Tables in Appendix B of the 2009 draft guidance contained VI indoor air cleanup levels and soil gas and groundwater screening levels. In 2009, the indoor air cleanup levels in Appendix B corresponded to standard, WAC 173-340-750 Method B and C air cleanup levels, calculated with reference doses (RfDs) and/or cancer potency factors (CPFs) obtained at that time from IRIS and other Environmental Protection Agency (EPA) toxicity databases. Soil gas and groundwater screening levels were calculated to be protective of these indoor air cleanup levels.

As of 2016, the Appendix B tables in the 2009 draft guidance are outdated and should not be relied upon. The VI indoor air cleanup and groundwater and soil gas screening levels in Ecology's Cleanup Levels and Risk Calculation (CLARC) data tables⁴ replace the 2009 tables and should be used instead. The CLARC table values are based on the most current Method B and C air cleanup levels and, for sub-slab soil gas screening levels, an attenuation factor different (that is, lower) than the value used to generate the Appendix B tables.

 <u>Updated and revised Ecology guidance related to petroleum VI (PVI) screening</u>. TCP Implementation Memorandum No. 14 (Ecology 2016) embodies new EPA recommendations for assessing sites where the only volatile subsurface contaminants of concern are those petroleum hydrocarbons that are associated with a fuel release. Implementation Memo No. 18 (Ecology 2018) also primarily applies to releases of

petroleum-containing fuels. It establishes generic TPH air cleanup levels and

⁴ Available at: <u>https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Contamination-</u> <u>clean-up-tools/CLARC</u> (Ecology 2018a)

corresponding soil gas screening levels. It provides additional guidance for developing PVI sampling plans for Tier I and Tier II, and discusses potential PVI threats to buildings that will be constructed in the future. These memoranda were specifically developed for sites where PVI is a potential concern.

 Developed frequently asked questions (FAQs) on whether specific portions of the 2009 draft VI guidance are still applicable. TCP Implementation Memo No. 21 (Ecology 2018) answers a number of questions regarding technical and policy changes that have occurred since the draft guidance was issued.

Since Ecology's 2009 draft VI guidance was prepared, EPA has concluded that brief exposures to TCE may cause serious health problems.⁵ Short-term inhalation exposures to TCE in indoor air have the potential to cause serious heart defects in a developing fetus. The damage can occur early in a pregnancy, possibly before the pregnancy is recognized.

While much of the draft 2009 guidance document is applicable to sites where TCE vapor intrusion is a possibility, there are several issues that are not considered in the draft guidance but should be evaluated, due to the potential for harm from short-term exposure. These issues are:

- 1. <u>Response speed</u>. Actions to protect a fetus from unacceptable TCE exposures should occur as rapidly as possible after discovering the contamination—that is, within days or weeks, depending on the likelihood and degree of potential exposure.
- 2. <u>Focus on women of childbearing age (which includes pregnant women)</u>. The developing fetus is sensitive to the effects of short-term TCE exposure, and preventing harm to the fetus relies on reducing the mother's exposure.
- 3. <u>Public outreach</u>. Promptly contacting people who live and work near TCE contamination is crucial for three reasons: 1) to identify women of childbearing age; 2) to explain the potential health hazards to building occupants and, 3) if warranted by site-specific conditions, to obtain permission to access buildings for property-specific investigation and exposure-reduction activities. Whenever possible, outreach activities should be conducted in collaboration with public health departments.

This degree of urgency, and the need for more intensive outreach to specific individuals, is not typically required at most MTCA sites. These issues are further discussed in Sections 5 through 7, following the discussion of Ecology's recommended short-term TCE action and screening levels.

⁵ Memorandum: Compilation of Information Relating to Early/Interim Actions at Superfund Sites and the TCE IRIS Assessment (USEPA 2014).

4.0 VI Screening and Action Levels for TCE

4.1. Indoor air action levels for TCE

Indoor air cleanup levels—which are used during Tier I and Tier II vapor intrusion assessments to determine whether further sampling, interim actions, or cleanup actions are indicated—are provided in the CLARC data tables.⁶ These concentrations are the same concentrations as the standard cancer and non-cancer Method B and C air cleanup levels in CLARC's *Air* data tables.

Air cleanup levels for TCE are lower than indoor air action levels for short-term indoor exposures. Cleanup levels apply to long-term (at least one year) average air concentrations for the entire population comprised of all genders and ages. Short-term indoor air action levels, on the other hand, only apply to three-week average concentrations for women of childbearing age. The average indoor air TCE concentration due to VI over **any** three-week interval should not exceed the applicable action level.

VI indoor air cleanup levels for long-term TCE exposures, and action levels for short-term exposures to women of childbearing age, are provided in Table 1 below. The table's Indoor Air Cleanup and Action Levels are compared to average indoor air TCE concentrations that result solely from site-contaminated soil gas (that is, vapor) intrusion. In some cases, this will mean that contributions to indoor air measurements from non-VI sources, such as outdoor or indoor sources, will need to be distinguished from those due solely to subsurface sources.

The short-term Action Levels for TCE in Table 1 are based on values recommended by EPA Region 10 (December 13, 2012, memorandum) and EPA Region 9 (July 9, 2014 memorandum).⁷ Region 10's 2012 memorandum states that, pursuant to an IRIS toxicological review, exposure to TCE can cause fetal cardiac malformations during a 21-day gestation window. To protect against the possibility of this occurring, the average concentration of TCE in residential indoor air should not exceed 2.0 μ g/m³ during any 21-day period of time in a given year. For commercial / industrial settings, where the receptors of concern are workers, indoor air TCE should not exceed 8 μ g/m³. The Region 9 memorandum identifies "accelerated" and "urgent response action levels" for residents and workers. The "accelerated" levels range from 2 to 8 μ g/m³; the "urgent" levels vary from 6 to 24 μ g/m³. The range of levels for both categories accounts for the varied lengths of time that receptors are expected to be exposed.

⁶ Cleanup Levels and Risk Calculation (CLARC). <u>https://fortress.wa.gov/ecy/clarc/CLARCHome.aspx</u>

⁷ For the Region 9 and 10 memoranda, see: <u>https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Vapor-intrusion-overview</u>

Level of Concern	Concentration (µg/m ³)	Risk Basis		
	TCE Indoor Air	⁻ Cleanup Levels		
Chronic (mea	in long-term air c	oncentration for RME receptor)*		
Method B	0.37	Cancer risk 1E-6		
(unrestricted land use)	0.91	Hazard quotient 1		
Method C	6.3	Cancer risk 1E-5		
(industrial land use)	2.0	Hazard quotient 1		
TCE Indoor Air Action Levels				
Short-term (maximum 3-week mean concentration for women of childbearing age)				
Unrestricted (residential)	2.0	Noncarcinogenic effect		
land use	2.0	based on 24 hours/day, 7 days/week		
Workplace scenario	7.5	Noncarcinogenic effect		
(commercial or industrial)	7.5	based on 45-hour work week		

Table 1.	Vapor intrusion	indoor air cleanup	p and action levels for T	CE
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* These values are available in CLARC (Ecology 2018a).

A number of other EPA Regions and states, including Massachusetts, New Jersey, New Hampshire, Minnesota, Ohio, Alaska, and Connecticut, have also adopted short-term TCE levels and recommended responses. These levels and response timeframes vary.

Consistent with EPA Region 10, TCE Action Levels in Table 1 are intended for comparison to the highest VI-caused indoor air levels averaged over any 21-day period. Ecology recognizes, however, that the fetal health effects that potentially arise from a short-term exposure to TCE could possibly result from an exposure to action level concentrations over a period less than three weeks. As of the date of this memo, we do not know how short this period could be, or whether shorter periods would only be harmful if TCE concentrations were significantly higher than Action Levels. Therefore, while this memorandum advocates comparing our Action Levels to measurements (or estimates) of average 21-day concentrations, Ecology also recommends that, if any 24-hour or 8-hour measurements of average indoor air TCE concentrations exceed Table 1's Action Levels (for residents or workers, respectively), prompt action should be taken to either reduce those concentrations, or reduce the degree to which women of childbearing age are exposed. Ecology will revisit this recommendation as more information becomes available about health effects attributable to short-term TCE exposures.

Table 1 is limited to providing a residential short-term TCE indoor air Action Level and a short-term Action Level for commercial/industrial workers. The residential concentration is intended to protect women of childbearing age who reside in the building and are continuously exposed to indoor air contaminated by VI. The commercial/industrial Action Level is protective of women

of childbearing age who work full-time shifts up to 45 hours per week.⁸ However, other women of childbearing age who occupy a building where VI is occurring may also be receptors of concern. For example, visitors to a building, part-time workers in a building, or students within a school building could potentially be exposed to contaminated indoor air over extended periods of time.

Table 1's short-term Action Levels should be used to determine whether prompt and protective actions like interim actions should be implemented (see <u>WAC 173-340-430</u>). **These Action Levels are not MTCA Method B or C air Cleanup Levels**. Furthermore, the MTCA regulations require that cleanup levels be established for one of two specific land uses: *unrestricted* or *industrial* site use.

4.2. VI short-term screening levels for TCE in groundwater and soil gas

CLARC's data tables also provide groundwater and soil gas screening levels that can be used to assess the potential VI threat posed by a subsurface source. As for the VI indoor air cleanup levels, these concentrations are based on chronic exposures. CLARC's groundwater screening levels are intended to be protective of corresponding indoor air cleanup levels, and assume there will be 1,000-times attenuation between groundwater VOC concentrations (in equilibrium with vapor concentrations) and indoor air levels. CLARC's sub-slab soil gas screening levels are also expected to be protective of indoor air cleanup levels. They assume there will be 33-times attenuation between soil gas VOC concentrations just below a building's slab and indoor air levels. (For further discussion on this, see the note box following Table 2 in this section.)

VI groundwater and sub-slab soil gas screening levels protective of short-term TCE indoor air action levels are presented in Table 2 below. These screening levels embody the same attenuation assumptions used to calculate the chronic subsurface screening levels provided in CLARC (as discussed above). In summary:

- The short-term VI screening levels for groundwater and soil gas are higher than CLARC's VI TCE screening levels, which are calculated for chronic indoor exposures.
- For residential buildings, the short-term screening level for groundwater is about twice as high as CLARC's chronic-based non-carcinogenic screening level (8 μg/l versus 3.8 μg/l, respectively), and approximately five times higher than CLARC's carcinogenic screening level (8 μg/l versus 1.6 μg/l).

⁸ The protection this paragraph refers to is the protection of the developing fetus. Exposures to TCE can also, of course, potentially affect the health of women themselves. Indoor "protection" for the women themselves should be assessed using the indoor air cleanup levels in the CLARC data tables, not the short-term action levels.

• Similarly, the short-term screening level for TCE in soil gas is about twice as high as CLARC's chronic-based non-carcinogenic sub-slab screening level (67 μ g/m³ versus 31 μ g/m³), and a little more than five times higher than CLARC's carcinogenic sub-slab screening level (67 μ g/m³ versus 12 μ g/m³).

Short-term TCE Subsurface Screening Levels	Concentration	Basis
	ground	dwater (in µg/l)
residential short-term VI Screening Level for groundwater	8	 TCE as a non-carcinogen receptor of concern: women of childbearing age residential indoor scenarios
non-residential short-term VI Screening Level for groundwater	31 1.	 TCE as a non-carcinogen receptor of concern: women of childbearing age commercial/industrial workplace scenarios
	soil ga	s (in µg/m³)
residential short-term VI Screening Level for sub- slab soil gas	67	 TCE as a non-carcinogen receptor of concern: women of childbearing age residential indoor scenarios
non-residential short-term VI Screening Level for sub- slab soil gas	250	 TCE as a non-carcinogen receptor of concern: women of childbearing age commercial/industrial workplace scenarios

 Table 2.
 Vapor intrusion subsurface screening levels for short-term exposures to TCE

NOTE: The 2009 draft guidance differentiates between the amount of soil gas-to-indoor air attenuation that should be assumed for soil gas VOC concentrations that are located immediately below the building (like sub-slab), versus those concentrations that are at significantly greater distances below ground surface (called "deep"). CLARC's VI data tables also make this distinction. "Deep" soil gas screening levels in CLARC assume 100-times attenuation between soil gas VOC concentrations and indoor air levels.

However, EPA's *Technical Guide for Assessing and Mitigating the Vapor Intrusion Pathway from Subsurface Vapor Sources to Indoor Air* (USEPA June 2015) does not recommend that soil gas levels be assumed to attenuate more than 33 times, regardless of depth. As a result, Ecology is re-evaluating the appropriateness of a deep soil gas VI screening level that assumes more than 33-times attenuation. At the time this memo was published, we are not withdrawing the recommended deep soil gas VI screening levels in CLARC, but:

- 1. These levels should not be used to assess the potential for an indoor air exceedance of the short-term TCE action level, and
- 2. For other assessment purposes (such as assessing the potential for an exceedance of a chronic-based indoor air cleanup level) the requisite 15-foot or greater separation distance should be applied to the depth of the vadose zone between the building foundation (not the ground surface) and the deep soil gas measurement. The short-term TCE Screening Levels identified in Table 2—referred to as "sub-slab" and calculated with an attenuation factor of 0.03—may also be compared to deeper soil gas sample measurements.

5.0 VI Investigation

Ecology's 2009 draft VI Guidance should generally be followed when investigating and addressing TCE vapor intrusion. But as noted in Section 3.0 above, the draft guidance does not discuss short-term inhalation exposures to TCE. The following investigation recommendations refer specifically to sites where TCE is a potential VI concern.

5.1. Identify any site buildings where VI may potentially result in indoor TCE concentrations above the short-term action level.

NOTE: The discussion in Section 5.1 assumes that indoor air sampling for TCE has <u>not</u> been conducted. If indoor air has already been sampled, and indoor TCE concentrations due to VI exceed the applicable short-term action level, appropriate responses are described and discussed in Section 6. If indoor air was sampled and TCE concentration measurements were <u>below</u> the short-term action level, the VI assessment team should determine whether those measurements represent the highest 3-week average indoor TCE concentration. Please see Section 5.4.

Determining which buildings are a potential concern is commonly accomplished by mapping site areas where TCE is, or may be, present in soils or shallow groundwater. Buildings above or close to these areas can then be identified. In parts of the site where soils are contaminated with TCE, soil gas samples are typically collected and analyzed.⁹ Ecology's 2009 VI Guidance, CLARC's VI soil gas Screening Levels, and Table 2's short-term soil gas Screening Levels above, can then be used to determine if VI could potentially result in indoor air cleanup level or action level exceedances (respectively) at nearby buildings.

Regardless of whether the potential subsurface VI source is contaminated soils or shallow groundwater, soil gas samples can be collected below or near a building, and the measured TCE levels can be used to determine the potential for an indoor exceedance of indoor air cleanup levels and/or action levels. However, if TCE concentrations in shallow groundwater are above CLARC's VI Screening Levels, or if significant soil contamination or residual non-aqueous phase liquid (NAPL) is close to a building and likely to contain elevated TCE concentrations, investigators should not delay indoor air sampling (see section 5.3). When these conditions are

⁹ *De minimis* levels of TCE in vadose zone soils (i.e., above the seasonal low water table) are unlikely to pose a VI threat. WAC 173-340-740(3)(b)(iii)(C)(III) defines such levels as concentrations no higher than concentrations "derived for protection of groundwater for drinking water beneficial use under <u>WAC 173-340-747(4)</u>." Concluding that TCE levels in soils are this low requires adequate characterization of vadose zone contamination.

present, the first indoor sampling event(s) should be a site priority and performed immediately, without waiting for a preliminary soil gas investigation.¹⁰

In areas where soils are not contaminated and shallow groundwater is the only potential VI source, the 2009 draft VI guidance, groundwater VI Screening Levels in CLARC, and short-term groundwater Screening Levels in Table 2 can be used to distinguish between buildings where VI could potentially result in exceedances of indoor air cleanup (chronic) or action (short-term) levels, and those where exceedances are highly unlikely.

In addition to the exceedance of subsurface VI screening levels, there may be other building- or site-specific reasons for suspecting that indoor air TCE concentrations could exceed the short-term action level. For instance, at some building locations, contaminated shallow groundwater may be the only potential VI source and TCE concentrations in this groundwater may be below the short-term screening level. However, the short-term groundwater screening levels assume a certain amount of attenuation and dilution of vapor-phase TCE between the groundwater surface and the indoor environment. While these are conservative assumptions for most buildings, they may not be if:

- There are preferential subsurface pathways that may result in higher soil gas VOC levels below the building than the short-term groundwater screening levels assume, or if
- There may be a higher soil gas flowrate into the building than the short-term groundwater (and soil gas) screening levels assume.¹¹

¹⁰ Ecology does not recommend that soil gas sampling be <u>initiated</u> at this point to determine if TCE concentrations exceed short-term soil gas screening levels. This is because it takes time to prepare (and approve) soil gas SAPs; obtain access; schedule and mobilize the related work; and, review the sampling results. Indoor air sampling should not be delayed while these activities are being performed. During or immediately following the first indoor air sampling event, however, it is prudent to obtain soil gas data.

¹¹ The short-term groundwater Screening Levels assume that vapor-phase TCE concentrations will attenuate by a factor of 1000 between soil gas levels immediately above (and in equilibrium with) contaminated groundwater and indoor air. This is generally a conservative assumption, but may overpredict the degree of subsurface attenuation in certain cases. Ecology's 2009 draft VI guidance describes the conditions where this may occur (e.g., sites with a very thin vadose zone (shallow water table); the presence of subsurface conduits capable of transporting elevated soil gas levels to areas directly below the building with minimal attenuation; etc.)

The short-term soil gas Screening Levels assume that vapor-phase TCE concentrations will attenuate by a factor of at least 33 times between soil gas levels immediately below the building and indoor air. Again, this is usually a conservative assumption. However, less attenuation is possible if the building or its foundation allows soil gas to enter interior spaces relatively unimpeded (which may occur, for example, when slab or basement wall penetrations or large cracks provide preferential conduits for entry).

5.2. Notify and involve Ecology

This memorandum presumes that Ecology will be involved throughout the VI evaluation process, including owner/tenant notifications, the initial building visit, indoor air sampling, data analysis, and post-sampling decision-making described in the rest of this section and in Sections 6 and 7. We have therefore identified certain recommended actions and decisions below as being responsibilities of both the party conducting the remedial actions (the responsible party) and Ecology.¹² However, in those cases where the responsible parties are acting independently and choose not to involve Ecology during some or all of these actions and decisions, they should complete the applicable and recommended steps in this memorandum themselves.

Regardless of whether Ecology oversees the site throughout the cleanup process, or whether another party independently conducts the remedial actions:

- 1. Ecology should be contacted as soon as the responsible party determines that women of childbearing age are current building occupants and indoor air sampling is needed to assess the potential for a short-term TCE action level exceedance (see Section 5.3 below).
- 2. If an Ecology staff person has already been assigned to the site, this is the individual who should be notified. Otherwise, the responsible party should contact their local Ecology regional office. They should not wait for Ecology's response before moving to the next steps of the investigation / response process. Find Ecology's contact information at https://ecology.wa.gov/About-us/Get-involved/Report-an-environmental-issue

5.3. Prepare for indoor air sampling

As soon as one or more site buildings have been identified as a location where VI may potentially result in indoor air TCE concentrations above the short-term action level, investigators should quickly plan for the next assessment steps—unless they already know that women of child-bearing age do not regularly occupy the buildings. At this point in the investigation, it is only *potentially possible* that indoor TCE concentrations actually exceed the Action Level, but several actions should occur without delay: notify building owners/tenants, determine if exceedances are occurring, and – if needed – take actions to protect the potential receptors.

1. **Contact building owner and/or tenant.** The owner/tenant of the building should be contacted to determine if women of childbearing age are current occupants, and to schedule a building and property visit. This initial contact should occur soon after the

¹² Please see footnote in Section 1.0 regarding use of the term "responsible party" in this memorandum.

building has been identified as potentially at risk. The owner and tenant(s) of these buildings should be notified that there is the *possibility* that VI-caused indoor air TCE concentrations exceed the acceptable chronic and/or short-term screening/action levels.

- 2. Schedule a building visit. If women of childbearing age are current building occupants, a building visit should be scheduled as soon as possible. During this visit Ecology and the responsible party will need to be prepared to discuss the potential TCE risk, explain how we would like to proceed, and answer exposure-related and other questions.¹³ If the responsible party does not own the building, they should also be prepared at this time to request building access for the purpose of collecting indoor air samples. Interactions with building owners and tenants during the period preceding indoor air sampling are further discussed in Section 7.0 below.
- 3. Prepare and finalize a SAP. Following the visit to the building and property, an indoor air Sampling and Analysis Plan (SAP) should be expeditiously prepared, reviewed, and finalized.¹⁴ The SAP should include a site/building-specific VI conceptual site model (CSM) that serves as the basis for the selection of data quality objectives and sampling design. The VI CSM, as discussed in our draft 2009 VI guidance document and in Section 5.4 of EPA's 2015 *Technical Guide for Assessing and Mitigating the Vapor Intrusion Pathway from Subsurface Vapor Sources to Indoor Air* (USEPA June 2015), is a combination of information, assumptions, and hypotheses that investigators use to support evaluations of the adequacy of available site-specific information, and guide the identification of critical data gaps.
- 4. **Schedule indoor air sampling.** After SAP finalization the first indoor air sampling event should be immediately scheduled. It should not be delayed to coincide with more desirable seasonal or meteorological conditions.¹⁵

¹³ Please see Section 7.1's discussion of VI-related risk communications.

¹⁴ This assumes that: a) an exceedance of the short-term TCE indoor air action level has not yet been measured, and b) the responsible party has decided not to pursue a "preemptive" response action. If an exceedance of the action level has already been measured, no additional pre-mitigation sampling may be needed. See Section 6.0 for a description of appropriate response actions.

Preemptive mitigation is a term often used to describe VI mitigation efforts implemented without (or prior to) confirmation that VI-caused indoor air contamination exceeds acceptable levels. When preemptive mitigation has been chosen as the next step in Section 5.3, indoor air sampling is not typically conducted until after mitigation has been implemented. See Section 7.8 of EPA's OSWER VI guidance document (USEPA June 2015) for additional information about preemptive mitigation.

¹⁵ The SAP should acknowledge the time-related considerations associated with determining if a shortterm action level is being exceeded, and propose the respective timeframes and due dates for obtaining and reviewing data.

5.4. Determine if 3-week average indoor air TCE concentrations exceed the short-term action level.

For those buildings occupied by women of child-bearing age, the VI investigation should provide sufficient information to determine whether 3-week average indoor air TCE concentrations ever exceed the short-term action level. This is unlikely to be evident from a single indoor air sampling event unless that event coincides with a period when maximum VI impacts are occurring. Because VI impacts can vary significantly over time, and because this variability cannot be easily predicted, it is essentially impossible to schedule an indoor sampling event that can be confidently assumed to coincide with, or otherwise represent, the highest 3-week average VI impact on air quality, unless the sampling program is designed to intentionally create nearmaximum VI conditions.¹⁶ Unless TCE concentrations measured during the first sampling event exceed the short-term indoor air action level, often the investigation will require multiple sampling events.

This memorandum does not provide indoor sampling guidance. For recommendations related to sampling methodologies, please refer to:

- Ecology's Implementation Memorandum No. 21 (Ecology 2018)
- Relevant portions of the Tier II discussion in Ecology's 2009 draft VI guidance
- Section 6.4 of EPA's VI guidance (USEPA 2015)
- Recent state guidance documents, such as New Jersey's *VI Technical Guidance* (NJDEP 2018).

When the receptor of concern is a current occupant of the building, and air samples are being analyzed at an off-site laboratory, expedited turn-around times should be requested. For at least

¹⁶ Generally, this is accomplished by inducing significant building depressurization just prior to the sampling event. Various degrees of depressurization, as well as positive pressurization, are typically induced to track indoor air concentration responses. (DOD 2017, McHugh 2017, and Johnson 2016.) The building depressurization methodologies that have utilized a blower-door approach, and have been subsequently described in the literature, can successfully meet project objectives. However, the methodology: a) is likely to be more successful at smaller and simpler buildings (architecturally, and in terms of interior design), and b) should not be <u>assumed</u> to result in higher, VI-caused, indoor air concentrations once significant depressurization has been achieved.

Even when conditions conducive to relatively extreme VI impacts are not intentionally created, they may fortuitously occur during a sampling event. That is, significant building depressurization may be "naturally" occurring during any given sampling event and this degree of depressurization may correspond to *worst case*-type VI-caused indoor air concentrations. At many sites and site buildings this often coincides with periods when indoor air temperatures are much higher than outdoor temperature. Continuously measuring pressure differentials of cross-slab or cross-first floor (for buildings with crawlspaces) throughout the indoor air sampling event can provide measurements that demonstrate the degree of building pressurization relative to the subsurface during the event. These measurements can be recorded regardless of the air sampling methodology used (such as canisters, passive diffusive samplers, or more real-time measuring devices).

the first sampling event, the goal should be to receive the laboratory's sampling data within three business days.

Immediately after the data have been received, they should be initially reviewed by the receiver and shared with other members of the decision-making team (such as the Ecology site manager,¹⁷ if the responsible party's consultant receives the laboratory data). For at least the first indoor air sampling event the goal should be to share these results with the decision-making team within seven days from the time of sample collection. The objective of the decision-making team's review is to then determine, as soon as possible, if: 1) the relevant TCE short-term indoor air Action Levels listed in Table 1 are being exceeded, and 2) VI is the likely cause.

The immediate review, and the decisions arising from that review, will not have the benefit of a sampling-data quality assessment or validation. These activities will typically occur later, when the results of the sampling event are being integrated into some form of VI evaluation report. It is possible, then, that a later assessment of data quality will lead to a conclusion that VI is *not* causing short-term indoor air action level exceedances, and that the earlier determination was incorrect. However, if the receptors of concern are current occupants of the building, the importance of providing timely information to those receptors should outweigh the potential that the information provided might later need to be revised.

It should also be emphasized that this section (Section 5.0) is specifically devoted to recommendations related to the potential for <u>short-term</u> inhalation exposures to TCE. As discussed in Section 4.0, CLARC's VI Indoor Air Cleanup Levels for TCE are lower concentrations than action levels established to be protective of short-term indoor exposures. This is because the Indoor Air Cleanup Levels in CLARC are based on chronic VI-caused exposures. Remedial actions such as VI mitigation may therefore be needed to protect long-term indoor exposures, regardless of whether the short-term indoor air TCE action level is exceeded.

¹⁷ If an Ecology site manager has not been assigned to the project, the results should be sent to the designated Regional contact.
6.0 Responding to Exceedances of the Short-term TCE Indoor Air Action Level

If VI is causing an exceedance of the TCE short-term indoor air action level, <u>prompt</u> action is needed. Such actions should be taken in consultation with the building's owner (and tenant, if applicable). Protecting people inside affected buildings is a high priority and any needed action should not be delayed. If additional, follow-up indoor air or other sampling is scheduled before the selected action is fully implemented, this sampling must be conducted in a manner that does not interfere with efforts to quickly and effectively reduce indoor exposures to TCE.

Systems for mitigating vapor intrusion

VI *mitigation* generally refers to actions whose purpose is to reduce VI-caused indoor air contamination, and these actions often focus on reducing the amount of contaminated soil gas entering the building.¹⁸ Mitigation systems creating **depressurization** of the sub-slab zone or crawlspace will often be the most effective approach for reducing VI impacts (until subsurface cleanup permanently remediates the source of elevated soil gas concentrations). However, these types of mitigation, which are intended to minimize entry of contaminated soil gas into the building, can take weeks to design, construct, and fully implement. Additional time is then needed to demonstrate that target VOC concentrations in indoor air have actually been achieved.

Active VI mitigation systems such as sub-slab and sub-membrane depressurization are often able to reduce VI-caused TCE indoor air contamination to concentrations below the short-term action levels. But before the mitigation system has been successfully implemented, TCE concentrations will, or may, be above these levels. If a woman of childbearing age lives or works in an area of the building where elevated TCE concentrations are present, and does not re-locate, she will continue to be exposed to them. Mitigation should therefore be designed and implemented as quickly as possible,¹⁹ and other actions should be considered that would effectively reduce exposures during the interim.

¹⁸ Subsurface <u>remediation</u>, on the other hand, includes cleanup actions designed to reduce soil gas VOC levels. Although these actions will also reduce VI-caused indoor air contamination, they are not typically referred to as VI "mitigation" unless they can be implemented (and are successful) within a relatively short timeframe.

¹⁹ The mitigator who will likely perform the work should be identified early (e.g., during the investigation's planning phase). His/her availability for constructing the mitigation system, if needed, should also be verified at this early stage.

EPA-recommended actions and MTCA cleanups

Prompt actions to reduce TCE exposures include the recommended responses described in EPA Region 9's 2014 TCE Memorandum under two headings: "Implementation of early or interim measures to mitigate TCE inhalation exposure," and "Tiered response action" (USEPA 2014). Many of the recommendations in these sections of the Memorandum are appropriate to use as a guide for selecting proper response actions in Washington state. However, three of Region 9's recommendations should be clarified in terms of their applicability at MTCA cleanup sites:

1. The recommendation to increase building pressurization/ventilation.

Positively pressurizing the building (with respect to the subsurface) can create a pressure barrier to advective flow of soil gas into the structure and mitigate VI impacts. However, it will not always be possible or sufficiently effective. Likewise, increasing ventilation can dilute VI impacts if the outdoor-to-indoor air exchange rate is increased. But it may not be practicable to increase the ventilation rate enough to reduce indoor air TCE below screening/action levels. Moreover, if the methods to increase the outdoor-to-indoor air exchange rate result in greater building depressurization, VI impacts may actually be exacerbated.

NOTE: At some buildings the owner/tenant may be able to quickly adjust HVAC settings to create these pressure or ventilation rate conditions. However, unless follow-up monitoring of indoor air quality is performed, there is no way to tell if TCE concentrations have been reduced to an acceptable level.

2. The recommendation to seal potential conduits.

It is possible that a single foundation or building feature is primarily responsible for the degree of vapor intrusion, leading to short-term indoor air TCE action level exceedances. For instance, there could be an uncovered earthen floor in part of the building. There could be an uncovered/unsealed basement, or a first floor sump or (disconnected) floor drain. There could be unsealed utility line penetrations at ground level or sub-grade. If the building has a crawlspace, there could be relatively large and unsealed first floor openings around pipes or wiring that run between the two levels. The crawlspace could also be walled-in, preventing any significant sub-floor ventilation and dilution of soil gas emissions.

Often, however, it won't be obvious where the most significant soil gas entry points are located. For this reason, conduit sealing measures are commonly combined with more effective mitigation actions.

In terms of the prompt action needed to respond to TCE action level exceedances, Ecology recommends that sealing efforts be:

- a) Focused on any easily observable and obvious major routes by which soil gas is likely entering the building;
- b) Only undertaken as the initial response if the sealing activity can be completed quickly; and
- c) Promptly followed up with indoor air sampling to verify the sealing's effectiveness.

3. The recommendation to respond differently, based on whether the "urgent" response action level has been exceeded.

The EPA Region 9 Memorandum states that the response to exceeding an "accelerated" action level should be "completed and confirmed within a few weeks." If the higher "urgent" action level is also exceeded, the response time should be reduced to "a few days."

Ecology agrees that, all else being equal, there should be a greater sense of urgency when TCE concentrations are much higher than the short-term action level established for the site and building. It is also true that the types of responses likely to be effective will often partly depend on how high the indoor air TCE concentrations are. But Ecology believes any exceedance of the short-term action level merits prompt action. This means that once an exceedance is apparent, the site team should quickly decide on the preferred response action, and then immediately propose this action to the building's owner/tenant.

If VI is causing an exceedance of the TCE short-term indoor air action level, the action to be taken should be quickly determined in consultation with the building's owner (and, if applicable, the tenant). The goal should be to reduce TCE exposures for women of childbearing age as soon as possible. This may require that a "stop-gap" response be taken right away, while plans for long-term mitigation proceed on a parallel track. Stop-gap responses include actions such as temporarily relocating the receptor, and installing effective indoor air treatment.

Carbon-based indoor air VOC treatment devices (sometimes referred to as air purification units [APUs] or "air cleaners") can be installed relatively quickly. These devices can be used for extended periods, but their typical, or niche, VI application is temporary use. Often they are operated only while a more permanent form of mitigation is being designed/constructed. As discussed in EPA's 2017 *Engineering Issue*, which describes these devices, indoor air treatment can be accomplished with portable air cleaning units or HVAC in-duct systems (USEPA 2017).

The former usually employs a built-in air circulation fan and sorbent bed, with carbon serving as the sorbent.

Indoor air treatment devices may or may not be able to quickly reduce TCE concentrations to acceptable levels within certain airspaces. Regardless of the treatment device selected, it cannot be assumed that the installed units will *sustainably* reduce indoor air TCE to concentrations below the short-term action level. As noted in EPA's 2017 *Engineering Issue*, this must be confirmed with air sampling.²⁰

²⁰ In the EPA 2017 Engineering Issue discussion of treatment systems, Attachment A lists a large number of VOC air cleaners by brand name. In 2014, California's DTSC reported use of Air Rhino and AirMedic Vocarb stand-alone air purifiers. The New Hampshire Department of Environmental Services and Massachusetts Department of Environmental Protection reported use of portable Austin HealthMate units in 2015 and 2016, respectively. (See "TCE Vapor Intrusion Case Study" presented at the 2015 NEWMOA conference, http://www.newmoa.org/events/event.cfm?m=157 and the October 2016 Field Assessment and Support Team (FAST): "An Expedited Approach to the Investigation and Mitigation of the Vapor Intrusion Pathway.").

Ecology does not endorse these particular products. We are including these references only to indicate that the products have been used in at least three states to reduce VI-caused indoor air contamination.

7.0 Working with people who are affected by vapor intrusion

This section, as well as Sections 5.0 and 6.0, discusses interactions with the owners and occupants of buildings where vapor intrusion is, or may be, contaminating indoor air with TCE. In the simplest case, the building is a single-family residence owned by the occupants. The responsible party and Ecology are then interacting primarily with a head of household. But various other scenarios are common, such as:

- a. The building may be a single-family residence that is owned by someone who resides elsewhere.
- b. The building may be occupied by a single business, which also owns the property.
- c. The building may be occupied by a single business, which does not own the property or building.
- d. The building may be occupied by multiple businesses, none, or only one, of which owns the property or building.

In some cases, the property where the building is located will be owned by the responsible party; in other cases, not.

Throughout this memorandum, we've used the term "building owners/tenants" when referring to notifications, access requests, information sharing, and other interactions with the affected public. We use this term for economy and simplicity, but recognize that owners are not always building occupants and receptors, and building occupants are not always owners or tenants. Women of childbearing age who occupy a building could be owners, tenants, employees or other workers, students, or visitors.

For communication purposes, it is helpful for the responsible party and Ecology to have no more than two designated "building contacts." Communications about scheduling building visits, obtaining access, sharing sampling data and data evaluations, and consultations concerning any response actions, can then be limited to a small number of individuals (who may or may not be potential "receptors"). It will be incumbent upon these building contacts to not only disseminate the information they receive from the responsible party and Ecology to (other) building occupants who are potentially being exposed, but to relay those occupants' concerns and questions back to us.

7.1. Outreach before indoor air sampling

As discussed in Section 5.1, any site buildings where VI may potentially result in indoor TCE concentrations above the short-term action level should be identified based on subsurface sampling and other site data. When such a building is identified and women of childbearing age are occupants, the planning, notification, and pre-sampling activities described in Section 5.3 should be performed. This includes a visit to the building itself.

In addition to obtaining the building and receptor-behavior information usually needed to prepare a VI indoor air SAP, during building visits Ecology and the responsible party should:²¹

- 1. Verify whether women of childbearing age regularly occupy the building. If they do (especially for non-residential buildings) the areas where these women spend most of their time, and the hours they are typically present in the building, should be ascertained.
- 2. Determine if women of childbearing age may be occupants in the foreseeable future, even if they're not currently present.
- 3. Discuss site contamination and how vapor intrusion can potentially contaminate indoor air; discuss what we propose to do next and the need for sampling access; answer their questions.

During the building visit, Ecology and the responsible party will need to be prepared for questions the occupants may have regarding potential short-term (and long-term) TCE health effects and how to reduce their exposures. Decisions should be made during the planning period (described in Section 5.3) about how and when this information should be provided, and who should communicate it.

Ecology staff are expected to only answer the most basic health-related VI questions. In general, the public should routinely be referred to local health departments or family physicians for the answers to questions that require toxicological or medical expertise.

Washington's state and local health departments are generally more familiar with local communities and their concerns than Ecology site management staff. Health departments also have more expertise at conveying health-related information. If women of childbearing age are potentially exposed to site-related TCE contamination, it is recommended that site managers and

²¹ As noted in Section 5.2, this memorandum assumes Ecology will be involved throughout the VI evaluation process. When this is not the case, parties performing the site investigation and cleanup should independently complete the recommended steps outlined in this memorandum.

the responsible party rapidly coordinate with state/local health departments. These agencies can better explain potential health hazards to building occupants and/or help gain access to buildings for investigation and remediation if needed. If Ecology has assigned a Community Outreach and Environmental Education Specialist (COEES) to the site, the site manager should additionally confer with this individual during the pre-sampling period.²²

Before any indoor air sampling can occur, the party performing that sampling must obtain the owner's/tenant's consent.²³ Typically during VI investigations, this consent is documented in an "access agreement," which also usually specifies the conditions under which access is granted. Finalizing an access agreement can occasionally be a lengthy process for various reasons. Sometimes it is difficult to make timely contact with the building owner or tenant. Sometimes the owner will elect to get the advice of legal counsel before entering into an agreement. There can be protracted negotiations regarding considerations such as access-related payment, or other site-specific issues. While securing access is normally the duty of the responsible party, Ecology may become involved with disputes or delays when the health threat relates to a short-term exposure to site contamination. The parties must realize that Ecology will make best efforts, including—if needed—exercising its legal authorities, to ensure access agreements are finalized as soon as possible.

7.2. Outreach after indoor air sampling

Indoor air sampling results, together with other lines of evidence, should indicate whether VI is causing an exceedance of the TCE short-term indoor air action level. Once the indoor air sampling data have been received from the laboratory (assuming no "real time" sampling was performed), the responsible party and Ecology should 1) discuss the results, 2) make a preliminary decision as to whether VI is likely to be resulting in a TCE short-term action level exceedance, 3) agree on next steps, and then 4) contact the building owner/tenant.

As discussed in Section 5.4, when women of childbearing age are current occupants of the building, this decision-making and outreach process should begin as soon as the data are initially received, without waiting for data quality assessment. In these cases the goal should be to quickly determine the likelihood of a TCE short-term indoor air action level exceedance and then inform building owners/tenants of the sampling results. Unless owners, tenants, and other

²² Ecology's COEESs are typically not assigned to independent cleanup sites, including those in the Voluntary Cleanup Program (VCP). However, if a COEES has been assigned to a site where VI is causing, or may potentially result in, indoor TCE concentrations above the short-term action level, their assistance can improve communications with the owners, tenants, and occupants of the affected buildings (as well as other members of the concerned public).

²³ With limited exceptions, such as emergency situations.

concerned building occupants would prefer to wait until the quality of sampling data has been rigorously assessed and validated, they should be notified of sampling results soon after the results arrive from the laboratory.²⁴

The responsible party and/or Ecology should tell the building owner/tenant what the sampling results indicate and what (at that time) the next steps should be. During this discussion, it is important to:

- 1. Explain how we have reached our conclusions.
- 2. Honestly differentiate between what is known (e.g., the results from this single sampling event), what we have inferred from the information we have collected, and what is not known, and
- 3. Urge the owner/tenant to share and explain these results-as well as plans for follow-up actions-with concerned building occupants. This includes all women of child-bearing age who live or work in affected portions of the building.

Coordinating with the site's assigned COEES and state/local health departments is critical at this stage and can improve the effectiveness of these communications.

If sampling data indicate that VI is likely to be causing an exceedance of the TCE short-term indoor air action level, and if a woman of childbearing age is a building occupant, the proper response should be quickly determined in consultation with the building's owner (and tenant, if applicable). Section 6.0 of this memo refers to various response actions that may apply. The selected action will depend on a number of building-specific factors, such as how high the indoor air TCE concentrations appear to be, and the preferences of the building's owner/tenant and receptors of concern. Promptly reaching, and carrying out, a mutually acceptable decision may require the involvement of state/local health departments.

If measured levels of indoor air TCE are below the action level, however, the next proposed step may simply be to schedule a re-sampling event for the future.²⁵

²⁴ When the data are shared this quickly, the building occupants should be informed of the possibility that the implications of the sampling results could change following evaluation of the data quality. Should this occur, the owner/tenant would then be immediately notified by the responsible party and/or Ecology.

²⁵ Typically, a sampling report is prepared after the data have been quality assured (QA'ed) and validated. A copy of the report, and a copy of any Ecology response letter(s), should usually be provided to the building owner/tenant.

8.0 References

- CARB. (2018). *Consumers' air cleaner portal* (webpage). Sacramento, CA: California Air Resources Board (CARB). Accessed September 2018: https://www.arb.ca.gov/research/indoor/aircleaners/consumers.htm
- DTSC. (2014). *Health-based indoor air screening criteria for trichloroethylene (TCE)*. (Human Health Risk Assessment (HRRA) Note Number 5). Sacramento, CA: California Department of Toxic Substances Control (DTSC), Office of Human and Ecological Risk (HERO). Retrieved from: <u>https://www.dtsc.ca.gov/assessingrisk/humanrisk2.cfm</u> and <u>https://www.dtsc.ca.gov/AssessingRisk/upload/HHRA_Note5.pdf</u>
- Ecology. (2009 / rev. 2017). Draft: Guidance for evaluating soil vapor intrusion in Washington state: Investigation and remedial action. (Ecology Publication No. 09-09-047).
 Olympia, WA: Department of Ecology, Toxics Cleanup Program. Retrieved from: https://fortress.wa.gov/ecy/publications/SummaryPages/0909047.html
- Ecology. (2013). Model Toxics Control Act regulation and statute: MTCA Cleanup Regulation Chapter 173-340 WAC, Model Toxics Control Act Chapter 70.105D RCW, Uniform Environmental Covenants Act Chapter 64.70 RCW. (Ecology Publication No. 94-06). Olympia, WA: Washington State Department of Ecology, Toxics Cleanup Program. Retrieved from: <u>https://fortress.wa.gov/ecy/publications/summarypages/9406.html</u> and

http://apps.leg.wa.gov/wac/default.aspx?cite=173-340

Ecology. (2016). Updated process for initially assessing the potential for petroleum vapor intrusion: Implementation Memo No. 14. (Ecology Publication No. 16-09-046).
Olympia, WA: Washington State Department of Ecology, Toxics Cleanup Program. Retrieved from: https://fortress.wa.gov/ecy/publications/SummaryPages/1609046.html

 Ecology. (2018a). Cleanup levels and risk calculation (CLARC database). Olympia, WA: Washington State Department of Ecology, Toxics Cleanup Program. Accessed September 2018: <u>https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Contamination-clean-up-tools/CLARC</u> Ecology. (2018b). Frequently asked questions (FAQs) regarding vapor intrusion (VI) and Ecology's 2009 Draft VI Guidance: Implementation Memo No. 21. (Ecology Publication No. 18-09-046). Olympia, WA: Washington State Department of Ecology, Toxics Cleanup Program. Retrieved from: <u>https://fortress.wa.gov/ecy/publications/SummaryPages/1809046.html</u>

- Ecology. (2018c). Petroleum vapor intrusion (PVI): Updated screening levels, cleanup levels, and assessing PVI threats to future buildings: Implementation Memo No. 18. (Ecology Publication No. 17-09-043). Olympia, WA: Washington State Department of Ecology, Toxics Cleanup Program. Retrieved from: https://fortress.wa.gov/ecy/publications/SummaryPages/1709043.html
- Ecology. (2018d). Website. Olympia, WA: Washington State Department of Ecology, Toxics Cleanup Program. Accessed October 2019: <u>https://ecology.wa.gov/</u>
- Hazardous Waste Cleanup—Model Toxics Control Act. WASH. REV. CODE § Chapter 70.105D RCW. (2013). Retrieved from: http://apps.leg.wa.gov/RCW/default.aspx?cite=70.105D

Johnson, P.C., Holton, C., Guo, Y., Dahlen, P., Luo, H., Gorder, K., Dettenmaier, E., and Hinchee, R.E. (2016.) Integrated field-scale, lab-scale, and modeling studies for improving our ability to assess the groundwater to indoor air pathway at chlorinated solvent-impacted groundwater sites. (SERDP Project ER-1686). Rosslyn, VA: Department of Defense, Strategic Environmental Research and Development Program (SERDP). Retrieved from: <u>https://clu-in.org/products/tins/tinsone.cfm?num=12112</u> and <u>https://www.serdp-</u> <u>estcp.org/content/download/39774/382131/file/Final%20Report%20V2%20ER-1686%20July%202016%20FOR%20POSTING.pdf</u>

- McHugh, T., (et al.) (2017). Recent advances in vapor intrusion site investigations. *Journal of Environmental Management*, 204(2), 793–792. Retrieved from:
 https://www.sciencedirect.com/science/article/pii/S0301479717301196?via%3Dihub
- NJDEP. (2018). Site Remediation and Waste Management Program vapor intrusion technical guidance (Version 4.1). Trenton, NJ: State of New Jersey Department of Environmental Protection, Site Remediation and Waste Management Program. Retrieved from: https://www.nj.gov/dep/srp/guidance/vaporintrusion/vig_main.pdf?version_4.1

 USDOD. (2017). Use of building pressure cycling in vapor intrusion assessment. (DoD Vapor Intrusion Handbook Fact Sheet Update No: 004). Washington, D.C.: U.S. Department of Defense, Environment, Safety and Occupational Health Network and Information Exchange. Retrieved from: https://www.denix.osd.mil/irp/vaporintrusion/unassigned/fact-sheet-building-pressure-cycling/ and https://www.denix.osd.mil/ and

https://www.denix.osd.mil/

USEPA. (2012). Memorandum: OEA recommendations regarding trichloroethylene toxicity in human health risk assessments. [Undated memorandum date stamped December 13, 2012]. Seattle, WA: U.S. Environmental Protection Agency, Region 10, Office of Environmental Assessment (OEA). Retrieved from: http://dec.alaska.gov/spar/csp/docs/OEA%20recommendations%20TCE%20dec%202012.
 <u>pdf</u> and https://ecology.wa.gov/DOE/files/33/33a04283-94c4-402d-a6be-220f05f32f7a.pdf

USEPA. (2014). Memorandum: Compilation of information relating to early/interim actions at Superfund sites and the TCE IRIS assessment. [Undated memorandum date stamped August 27, 2014]. Washington, D.C.: U.S. Environmental Protection Agency, Office of Solid Waste and Emergency Response. Retrieved from: <u>https://semspub.epa.gov/work/HQ/174044.pdf</u>

USEPA. (2014). Memorandum: EPA Region 9 response action levels and recommendations to address near-term inhalation exposures to TCE in air from subsurface vapor intrusion. (July 9, 2014). San Francisco, CA: U.S. Environmental Protection Agency, Region 9, Superfund Division. Retrieved from: https://ecology.wa.gov/DOE/files/4f/4fb8c34a-f785-41f7-8dea-e2ee341a31a2.pdf and https://yosemite.epa.gov/r9/sfund/r9sfdocw.nsf/3dc283e6c5d6056f88257426007417a2/6a 24ed351efe25b888257d16007659e8/\$FILE/R9%20TCE%20Action%20Levels%20and% 20Recs%20Memo%207_14.pdf

USEPA. (2015). OSWER Technical guide for assessing and mitigating the vapor intrusion pathway from subsurface vapor sources to indoor air. (OSWER Publication 9200.2-154.) Washington, D.C.: U.S. Environmental Protection Agency, Office of Solid Waste and Emergency Response. Retrieved from: https://www.epa.gov/sites/production/files/2015-09/documents/oswer-vapor-intrusion-technical-guide-final.pdf

USEPA. (2017). Adsorption-based treatment systems for removing chemical vapors from indoor air. (Engineering Issue EPA/600/R-17/276). Cincinnati, OH: U.S. Environmental Protection Agency, Office of Research and Development, National Risk Management Research Library [National Exposure Research Library]. Retrieved from: https://cfpub.epa.gov/si/si_public_file_download.cfm?p_download_id=532560&Lab=NE_RL and

https://cfpub.epa.gov/si/si_public_record_report.cfm?dirEntryId=337835

Attachment A

Response to comments on the November 18, 2018, review draft of Implementation Memo No. 22: Vapor Intrusion (VI) Investigations and Short-term Trichloroethene (TCE) Toxicity

A public comment period was held from November 21, 2018, through January 7, 2019, for the review draft of this document. The comments received during that period helped inform modifications made to the final version of the document (dated October 1, 2019) and are summarized below. A number of editorial changes were also made to the review draft that are not reflected in this response to comments document.

 Comments regarding the Environmental Protection Agency's (USEPA's) 2014 Memorandum: *Compilation of Information Relating to Early/Interim Actions at Superfund Sites and the TCE IRIS Assessment*, and the discussion of short-term inhalation exposures to TCE in Section 3 of Ecology's Implementation Memorandum 22. In particular, a commenter suggested clarifying in the third-to-last paragraph of this Section that the reference to EPA's 2014 Memorandum has limited applicability to certain statements made in later portions of the paragraph.

Response – To better distinguish the citation to EPA's 2014 Memorandum and that document's content from later statements in the paragraph, Ecology has made changes to the language in this part of Section 3.0, and removed the last sentence contained in the draft version of the third-to-last paragraph.

- 2. Comments regarding Section 4 of Implementation Memorandum No. 22, and in particular:
 - a. The use of different default exposure assumptions-and different screening valuesthan used by EPA Region 9; and
 - b. Distinguishing between receptors of concern (women of child-bearing age versus the developing fetus).

Response – Implementation Memorandum No. 22's indoor air TCE action levels, listed in Table 1 of the document, are based the assumptions that a woman carrying a developing fetus could be exposed to indoor air TCE concentrations:

- a) In a home for 24-hours per day, every day of the week throughout the year; and,
- b) In the workplace for 45-hours per week, 260 days per year.

EPA Region 10's December 13, 2012, Memorandum, which served in part for the action levels we selected, recommends levels of 2 μ g/m3 for residential settings and 8.4 μ g/m3 for commercial/industrial settings. Ecology chose the same residential value for Implementation Memorandum 22. For the commercial/industrial action level, however, we opted to assume an additional five hours of weekly exposure. For this reason our commercial/industrial action level (7.5 μ g/m3) is 12.5% lower than Region 10's corresponding level.

The commenter is correct that when Implementation Memorandum No. 22 refers in Section 4.1 to the protection of women of childbearing age against unacceptable short-term TCE exposures, our concern is for the developing fetus. The short-term action level concentrations cannot be assumed to be sufficiently protective of the woman herself. Ecology has therefore made changes to the third-to-last and second-to-last paragraphs of Section 4.1 to better clarify the action levels' applicability.

Since the close of the public comment period, other changes were made to Implementation Memorandum No. 22 based on comments received from Seattle & King County Public Health and Ecology's Toxics Cleanup Program. Among the substantive changes:

- (1) Language was added to Section 3.0 to clarify that the "focus on women of childbearing age" includes pregnant women; and
- (2) Language was added to Section 1.0 similar to the statements in Section 5.2 noting that when Ecology is not directly involved in the management of a cleanup site where TCE is a contaminant of concern, the parties performing the site investigation and cleanup should independently perform the Memorandum's recommended steps; and
- (3) Language was added to Section 7.0 noting that Ecology's Community Outreach and Environmental Education Specialists (COEESs) are typically not assigned to independent cleanup sites, including those in the Voluntary Cleanup Program (VCP).

Appendix B Boring Logs

	Boring Log Sheet 1 of 2 CC-MW-01							
Proje	ect: Cars	on Cleaners Facility			Loc	ation: Seattle, WA	Project #: 200544-01.01	
Clien	t: Helse	ll Fetterman			Con	Contractor: Holt Services Inc. Drilling Equipment: Geoprobe 7822DT		
Logg	ed By: 7 /	/24/2020			Me	thod/Core Diameter: Direct Push / 2.25 inches OD	Total Depth (feet): 30.0	
Nortl	ning: -1	22.31442	Easting: 47.66	32	Hor	izontal Datum: NAD 83 WA State Plane North, feet	Date Started: 7/24/2020	
Obser	ved Gro	undwater (ft bgs): 22			Elev	vation (ft MLLW): 216.0	Date Completed: 7/24/2020	
_						Soil Descript	ion	
In-situ Depth (feet)	Elevation (feet MLLW)	Sample	Chemical Analysis	Recovery	PID	Samples and Descriptions are in in-situ depths. Classification Scheme: USCS		
	216				0	One inch hardscape layer (asphalt) at surface. 0 - 13 ft: Loose to dense, moist, light brown, GRAVELL medium sub-rounded gravel, trace silt (fill).	Y SAND (SW), fine to coarse-grained sand, small to	
-2	- - - 214 -			100%	0			
-3	213				0			
5	211				0			
-6	- 210 - 210 - 209				0			
	208			100%	0	@8.0 ft: Grades to gray, dense, with silt		
-9	207				0	@9.0 ft: Grades to medium dense		
- 11	205				1.0			
	204			100%	1.6	@11ft: 3-inch cobble		
- 14	203	CC 1011/04 14 5	CVOCs,		7.4	13-20 ft: Medium dense, moist, light brown, poorly gr (native contact).	raded SAND (SP), fine to medium-grained, trace silt	
- 15	201	CC-IVIW-01-14.5	NWTPHDx		7.0			
- 16	200 		01/06	100%	7.2			
- 18	198	CC-MW-01-18	NWTPHGx, NWTPHDX		14.1 8.0			
E 20	196				8.3			
	Notes: CVOCs: Chlorinated Volatile Organic Compounds, NWTPH: Northwest Total Petroleum Hydrocarbons, Gx: Gasoline-Range Organics, Dx: Diesel-Range Orangics							

					Boring Log cc-MW-01	Sheet 2 of	2	
Project: C	arson Cleaners Facility			Loc	ation: Seattle, WA	Project #: 200544-01.01		
Client: He	lsell Fetterman			Con	tractor: Holt Services Inc.	Drilling Equipment: Geoprobe 7822DT		
Logged By	7/24/2020			Me	thod/Core Diameter: Direct Push / 2.25 inches OD	Total Depth (feet): 30.0		
Northing:	-122.31442	Easting: 47.66	32	Hor	izontal Datum: NAD 83 WA State Plane North, feet	Date Started: 7/24/2020		
Observed G	Groundwater (ft bgs): 22			Elev	ration (ft MLLW): 216.0	Date Completed: 7/24/2020		
			1					
In-situ Depth (feet) Elevation	(M) Sample	Chemical Analysis	Recovery	PID	Sediment Description Samples and Descriptions are in in-situ depths. Classification Scheme: USCS			
$\begin{array}{c} 20 & 1 \\ -21 & 1 \\ -22 & 1 \\ -23 & 1 \\ -23 & 1 \\ -24 & 1 \\ -25 & 1 \\ -26 & 1 \\ -26 & 1 \\ -27 & 1 \\ -28 & 1 \\ -28 & 1 \\ -28 & 1 \\ -29 & 1 \\ -30 & 1 \\ -31 & 1 \\ -33 & 1 \\ $	96 97 98 99 99 90 90 90 90 90 88 88 87 CC-MW-01-24 91 90 88 88 87 CC-MW-01-29 88 88 83 83 83 84 83 84 83 84 83 84 83 84 83 84 83 84 83 84 83 84 83 84 83 84 83 84 85 84 85 85 86 87 78 88 87 78 88 87 78 88 87 78 88 8	CVOCs, NWTPHGx, NWTPHDx CVOCs, NWTPHGx, NWTPHDx	100%	0 11.7 15.8 13.1 12.7 14.7 14.6 25.0 8	20-25 ft: Loose to medium dense, moist to wet, brow @22 ft: Observed groundwater depth in boring @24 ft: 0.25-inch silt lens @24.5 ft: 0.25-inch silt lens 25-29.5 ft: Medium dense, damp, light brown to gray trace fine-grained sand. @27 ft: Grades to dense, gray 29.5-30 ft: Dense, damp, gray, GRAVELLY SAND (SW), rounded gravel. End of Boring @30 feet.	rn, SILTY SAND (SM), fine to medium-grained.		
	76							
V	R ANCHOR	Notes	CVOCs: C NWTPH:	Chlorinat Northwe	ed Volatile Organic Compounds, est Total Petroleum Hydrocarbons.			

QEA 2000 1201 3rd Avenue Suite 2600 Seattle, WA 98101 206-287-9130

Gx: Gasoline-Range Organics, Dx: Diesel-Range Orangics

Appendix C Well Logs



WELL DETAIL LOG

Project Number: 202280-01.01 Client Name: Project Name: **Carson Cleaners Facility** Location: University District, Seattle, WA

Helsell Fetterman

Holt Services, Inc.

Driller:



Boring/Well No.:	MW-01
Top of Casing Elev.:	215.8
Ground Surface Elev.:	216.0
Installation Date:	07.24.2020
Permit/Start Card No.:	BMP001

EXPLORATORY BORING

Α.	Total depth:		30		ft.	
В.	Diameter		2.25	j	in.	
	Drilling method:		Direct	t-P	ush	<u>1</u>
<u>w</u>	ELL CONSTRUCTION					
C .	Well casing length:		30		ft.	
	Well casing material:		Steel			
D.	Well casing diameter:		0.75	j	in.	
Ε.	Well screen length:		10		ft.	
	Well screen type:	So	chedule	e 40) P\	/C
	Well screen slot size:		0.01	j	in.	
F.	Well sump/end cap length:		0.1		ft.	
G.	Well casing height (stickup)	:	1.5		in.	
H.	Surface seal thickness:		2.0		ft.	
I.	Surface seal material:		Concr	ete		
J.	Annular seal thickness:		16		ft.	
K .	Annular seal material:	3	5/8" Ber	ntor	nite	Chips
L.	Filter pack seal thickness:		NA		ft.	
М.	Filter pack seal material:	1	2-20 S	ilica	a Sa	and
Ν.	Sand pack thickness:		12		ft.	
O .	Sand pack material:		12-20 8	Silic	a S	Sand
Ρ.	Bottom material thickness:		NA		ft.	
Q.	Bottom material:		NA			
R.	Protective casing material:		Steel			
	Well centralizer depths:		NA		in.	
S.	Protective casing diameter:		5	j	in.	

NOTES:

Top of PVC well is 2-inches below grade. Well mount cap is set flush with surrounding grade.



Daily Safety Briefing Form



Date:

8 - 14 - 2020 200544-01.01

Project No: 2

Project Name: Former Carson Cleaners Vapor Intrusion Evaluation

Person Conducting Meeting: <u>STEPHEN</u> STMEIL	Health & Safety Officer: DRVM TEMPLETON	Project Manager: NATTHAN Soccon		
TOPICS COVERED:	l	0		
$ec{arphi}$ Emergency Procedures and	🗹 Lines of Authority	🗹 Lifting Techniques		
Evacuation Route				
🗹 Directions to Hospital	Communication	🔎 Slips, Trips, and Falls		
HASP Review and Location	🗹 Site Security	Hazard Exposure Routes		
Z Safety Equipment Location	Serversel Safety Protocols	Heat and Cold Stress		
💋 Proper Safety Equipment Use	🖵 Work Zones	Overhead and Underfoot Hazards		
🗹 Employee Right-to-Know/	\Box' Vehicle Safety and Driving/	Ź Chemical Hazards		
SDS Location	Road Conditions			
Fire Extinguisher Location	Equipment Safety and Operation	🔎 Flammable Hazards		
Eye Wash Station Location	🗹 Proper Use of PPE	🔎 Biological Hazards		
🗍 Buddy System	Decontamination Procedures	Eating/Drinking/Smoking		
Self and Coworker Monitoring	Near Miss Reporting Procedures	🗹 Reviewed Prior Lessons Learned		
Field Team Medical Conditions fo	r Emergency Purposes (Confidential):			
Dother: (OVFD)				

Weather Conditions: SUNNY, 70F	Atten	dees
	Printed Name	Signature
	STEPHEN STREPT	SBS
Daily Work Scope: Monston Coston WELL		
SAmplang		
Site-specific Hazards: COC / THANSTENIS / NEFOLES THATETC		
	End of Day We	ellness Check
Safety Comments:	·	



	Dai	ly Log
V AN QE	CHOR A EEE Mw - neveropunear	Anchor QEA, LLC 720 Olive Way, Suite 1900 Seattle, WA 98101 Phone 206.287.9130 Fax 206.287.9131
	- CAREN CLEBRANS FA	TITA DATE: 8-14-2.20
SITE ADDRESS	47m BADTULYNI AVE - C	PERSONNEL: S. STREFIL
WEATHER:	WIND FROM: N NE E SE (S SW W NW CGHP MEDIUM HEAVY RAIN ? TEMPERATURE: °F ? (Circle appropriate units)
TIME	COMMENTS	
0930	AT SEATTLE OFFICE / P	NEP+ MOBE
	- PECKUP FLE/ EQUERM	ENS / DRVM FOR GW
1345	ON SITE (CANSON CLEA	NENS H+S CALEBRATEONSS
	set up AT (C-MW	- 01 WELL (SEE GW FORMS)
1405	BEGET PURGE (PULL	En 3 WER VOLVMES)
1500	SAMPLED CC-MU	-01-20200814 + ms/msv
-	GPS LUCATIONS	
	SAMPLE STIMAGE ON	ILE
1545	LEFT STIE	
1615	AT SEXTTLE OFFICE	For DEMOB
Signature:	STEPIton Smert	



1201 3rd Avenue, Suite 2600 Seattle, Washington 98101 Phone 206.287.9130 Fax 206.287.9131 www.anchorgea.com

Well ID:	CC-MW-01				Date:	Date: &-/ Y- Z O Sampler: S. Strehl				
Project	Name: Carso	n Cleaners	Facility		Projec	Project Number: 200544-01.01				
Method:	eristaltic P	ump/Low F	low/YSI-	>						
Initial De	pth to Water	16	.95		Total [Depth to Wel	I '	29.16		
Weather	Observation	is: Σ	sam,	80's						
Time	Depth to Water (feet)	Rate (mL/m)	Cum. Vol (mL)	Temp (°C)	рН	Spec. Cond. (mS/cm)	ORP (mV)	Turbidity (NTU)	Commer	nts
430	17.35	is d	3990	-> BE	Fr Y	SI CON	NECTFE	W	CLEAR, NO	on
435	17.35	150	4500	17.7	7.15	0.321	-162.9	34.7	u u	
1440	17.26	150	5750	18.0	7.04	0.312	-175.8	24.8		
1445	17.35	150	6000	17.9	7.04	0.312	-188.9	10.9	cuth, aro	mon
1450	737	150	6750	17.9	7.04	0.312	-192.0	a [0.[
1455	17.35	150	7500	17.9	7.04	0.312	-197.2	10.2		
Notes: 3 V en Total Vol Sample I Duplicate Other:	1405 BEG - prace ume Purged D/time: 15 e ID/time: 15	z_N punk $z_N = 16$ $z_N = 16$	E AT A 25 SAL (UPLE FNG	ISOM MEN 3785 n CC-N	1 /m .2) (Vé 1w-01 25 3	- ZOTOE	(1641 10 SIUT 814	V FOR FAD + MS/MSD 20-30)	15T 10 MARN)

YSI ProDSS RENTAL CALIBRATION CERTIFICATE

SERVICE TECHNICIAN

EQUIPCO

RENTAL CUSTOMER: Anchor ODA

INSTRUMENT INFORMATION

RENTAL I.D. NUMBER: YSIPRODSS. $O \Upsilon$

RENTALS

SERIAL NUMBER: 66 102615

CALIBRATION INFORMATION

PARA	METER:	STANDARD:	PASS (,)	LOT #
	1. CONDUCTIVITY	1,000 µMhos	$\overline{\lambda}$	S5029
	2. pH ZERO	pH 7	<u>\</u>	031274
	pH SLOPE	pH 4	à	0312-73
	pH SLOPE	pH 10	<u>\</u>	03123
	3. DISSOLVED OXYGEN	Air Calibration Barometric pressure = 760mmHg	4	N/A
-	4. TURBIDITY ZERO	0.0 NTU's		
-	TURBIDITY SPAN	20 NTU's		
	5. REDOX (ORP)	231mV (YSI Zobell solution)	\succeq	121719

DATE: 8/14/20



DAILY SAFETY BRIEFING

DATE: 11-18-2020

PROJECT NAME: Carson Cleaners Facility

PROJECT NO: 202280-01.01

PERSON CONDUCTING	HEALTH & SAFETY	PROJECT Halah Voges/Nathan		
MEETING: Stephen Strehl	OFFICER: David Templeton	MANAGER: Soccorsy		
TOPICS COVERED:				
Emergency Procedures and Evacuation Route	Lines of Authority	Lifting Techniques		
Directions to Hospital	Communication	🔀 Slips, Trips, and Falls		
HASP Review and Location	Site Security	Hazard Exposure Routes		
Safety Equipment Location	Vessel Safety Protocols	Heat and Cold Stress		
🛛 Proper Safety Equipment Use	🚺 Work Zones	Overhead and Underfoot Hazards		
Employee Right-to-Know/MSDS Location	Vehicle Safety and Driving/Road Conditions	Chemical Hazards		
Fire Extinguisher Location	🗹 Equipment Safety and Operation	🗹 Flammable Hazards		
Eye Wash Station Location	Proper Use of PPE	🔎 Biological Hazards		
🔲 Buddy System	Decontamination Procedures	Eating/Drinking/Smoking		

Other: COVID

Self and Coworker Monitoring	\square	Self and Coworke	r Monitoring	
------------------------------	-----------	------------------	--------------	--

WEATHER CONDITIONS: RAIM, 46F		ATTE	NDEES
	PRINTED	NAME	SIGNATURE
	Ster Hen	STREAT	835
DAILY WORK SCOPE: GW SAMPLENG,			
SITTPPTNG			,
SITE-SPECIFIC HAZARDS: COC / TRANSFERTS			
GLASS (TRAFFAC			
SAFETY COMMENTS:			

	Daily Log		
Anchor QEA L.L.C. 1201 3rd Ave, #2600 Seattle, WA 98101 Phone 206.287.9130 Fax 206.287.9131			
	E: Carson Cleaners Facility (202280-01.01) DATE: /(-(8-2020		
WEATHER:	WIND FROM: N NE E S SW NW LIGHT MEDIUM HEAVY SUNNY CLOUDY RAIN ? TEMPERATURE: ° F . ° C		
TIME	COMMENTS		
0800	AT SCATTLE OFFICE / PROP + MOBI		
0900	LEFT OFFICE - 20 OFENIN / The ptenup		
1000	ON SITE @ CARSON CLEANONS / CC-TB-ZOZOUIS LABELES (WC. 6x)		
	- CALEBRATION / HEALTH + SAFETY / SET UP ON CL-MW-01		
1015	BEGIN DUNCE (SEE GW FORMIS) - CALL WITH J. MARSAULA FOR CONFERMA		
1055	SAMPLED CC - MW - 01 - 2020 1118 (VOC, Gx, Dx)		
1100	Samples populate ce-mw- 1001-20201118 (voc, Gx, Dx)		
	- CLEANUP /LABERS / DURGE WATCON MT FOI DOWNS		
1145	LEFT STIE FOR 20 PROP OFF Q EQUIPIO		
	- SAMPLES PREPAR FOR SITTEPTERE		
1330	COOLON SHAPPIN @ FENEX OVERATENT		
1415	RETURN TO SERTTLE OFFICE		
	- DEMORS / FORMS SCANS / BATABUSE		
	55 11-18-2020		

Signature:	SB S	
	\bigcirc	



Well ID: CC-MW-01 Project Name: Carson Cleaners Facility				Date: [/ - /8 - 7070 Sampler: S. Strehl						
				Proje	Project Number: 202280-01.01					
Method	Low Flow /	Peristaltic I	Pump / YS	SI						
Initial De	pth to Water	17	.30		Total	Depth to Wel	I	29	.16	
Weather	Observation	IS: RAFI	3, 48	°F,SE	uan	~				
Time	Depth to Water (feet)	Rate (mL/m)	Cum. Vol (mL)	Temp (°C)	рН	Spec. Cond. (mS/cm)	ORP (mV)	RP V)	Turbidity (NTU)	Comments
1025	17.46	150	1500	->B	UFN	YSI CO	ww	21	FON	CLEAN, WO COUN
030	17.46	150	2250	14.8	6.59	0.296	- 30	.8	38.8	а, <i>и</i>
1035	17.46	150	3000	15-0	6.56	0-300	-46	8.0	15.9	4 11
1040	17.46	150	3750	15.0	6.60	6-301	-50	.6	9.45	1 1
1045	17.46	150	4500	15.1	6.61	0.302	~ 52	.3	9.41	4.1
1050	17.46	150	5250	15.1	6.61	0.302	- 53	· 0	9.39	ИИ
1055	SYDAS	5 ¥61	1 SA	mpre	P					
1100	DUTPLE	entre	SAMP	in						
	Į –		1							
					-					
Notos:							P			
~/	019 BEG.	EN pung	6/150	ome la	n Fon	10 MEN	(150	om	· purkey)	
- (SW FAT	FALLY (CLEAN 1	NO O	nong					
Fotal Vol	me Purced			,	-					
	unie i urgeu.		no:0 m	L						
Sample I	D/Time: C.	-mw	- 01	- 2020	0118	@ 1055				
			Ψ. (- · •					
Duplicate	ID/Time: C	c - mn	-100	1 2	202011	18 @ 11	00			
1				~	1	1				\
)ther:	ory tu	3 thh	SET	(a	25 8	as Ise	NETT	J I	20-30.)

YSI ProDSS RENTAL CALIBRATION CERTIFICATE

SERVICE TECHNICIAN RENTAL CUSTOMER: Avelor QPA <u>INSTRUMENT INFORMATION</u> RENTAL I.D. NUMBER: YSIPRODSS.01 SERIAL NUMBER: 65-102-612

RENTALS

EQUIPCO

CALIBRATION INFORMATION

PAR	RAMETER:	STANDARD:	PASS()	LOT #
	1. CONDUCTIVITY	1,000 µMhos	X	55029
	2. pH ZERO	pH.7	×	031274
	pH SLOPE	pH 4	<u>×</u>	0317-73
	pH SLOPE	pH 10	×	031275
	3. DISSOLVED OXYGEN	Air Calibration Barometric pressure = 760mmHg	×	N/A
	4. TURBIDITY ZERO	0.0 NTU*s	1	N/A
		20 NTU's		
	5. REDOX (ORP)	231mV (YSI Zobell solution)	\succ	121719

DATE: 11/17/20



P.O. Box 5606

DELIVERY SLIP

Date Transaction no 17-Nov-20 01-50873-1

Page: 1 of 2

C	oncord, CA	94524			Page:	1 of 2
 Anchor QEA-Seattle 1201 3rd Ave. Suite 2600 Seattle WA 98101 Tel: 206-287-9130 E 		EA-Seattle Ave. 0 A 98101 87-9130	S Stephen Str H I P E D			
Cust	omerno	2879130	Representative	Jason Miller		
Cust	omer P.O.	202280-01.01	SHIP VIA	Will Call		
Quot	ation no	0-0	Shipping	18-Nov-20	11/18/2020	
Reservation no			Close Contract	18-Nov-20		
Cont	ract no	0-0				
Qt	y Regist	ration Code Ret. Qty	Des	cription		

Qty Registration Code Ret. Qty MULTIP: MULTIPARAMETER INSTRUMENTS

- · ·				
	1	YSIPRODSS.01		YSI ProDSS
	1	PRODSSCBL4.01		YSI ProDSS Cable
	1	PRODSSCOND.01		YSI ProDSS Cond/Temp Probe
	1	PRODSSODO.01		YSI ProDSS ODO Probe
	1	PRODSSPH.01		YSI ProDSS pH/ORP Probe
	1			YSI ProDSS Probe Guard
	1			YSI ProDSS Sonde Weight, 4.9 oz
	1			YSI ProDSS Cal Cup
	1			YSI ProDSS Flow Cell
	1			YSI ProDSS Flow Cell O-Ring Kit
	1			YSI ProDSS Thumbdrive Manual/Software
	1	,	<u> </u>	YSI ProDSS Manual
	1		<u></u>	YSI 6 foot USB Cable
	1			YSI 6 Inch USB Cable
	1			YSI ProDSS Charger
	1			YSI ProDSS Case
	2			YSI Flow Cell Fitting, 1/4" Hose Barb
	2			YSI Flow Cell Fitting, 3/8" Hose Barb

WLM: WATER LEVEL METERS

FUIIPCO			1-888-234-5678	DELI	DELIVERY SLIP			
			www.equipcoservices.com	Date	Transaction no			
пÓ	Day 5606			17-Nov-20	01-50873-1			
P.U. Cor	ncord, CA	94524			Page: 2 of 2			
I N V O I C E	Anchor QE 1201 3rd / Suite 2600 Seattle W/ Tel: 206-2	A-Seattle Ave.) A 98101 87-9130	S Stephen St H I P E D	rehl				
Custor	merno	2879130	Representative	Jason Miller				
Custor	mer P.O.	202280-01.01	SHIP VIA	Will Call				
Quotat	tion no	0-0	Shipping	18-Nov-20	11/18/2020			
Reservation no			Close Contract	18-Nov-20				
Contra	ict no	0-0		- 1				
Qty	Regist	ration Code Ret. Qty	Des	cription				
	1 WLM100	DP6.31 Solir	nst Water Level Meter, 100' P6					

1

Solinst Water Level Meter, 100' P6

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Solinst Tape Guide

Shipping Notes W/C

Appendix E Laboratory Reports

Service Request No:K2006350



Nathan Soccorsy Anchor QEA, LLC 720 Olive Way, Suite 1900 Seattle, WA 98101

Laboratory Results for: Carson Cleaners Vapor Intrusion Evaluation

Dear Nathan,

Enclosed are the results of the sample(s) submitted to our laboratory July 28, 2020 For your reference, these analyses have been assigned our service request number **K2006350**.

Analyses were performed according to our laboratory's NELAP-approved quality assurance program. The test results meet requirements of the current NELAP standards, where applicable, and except as noted in the laboratory case narrative provided. For a specific list of NELAP-accredited analytes, refer to the certifications section at www.alsglobal.com. All results are intended to be considered in their entirety, and ALS Group USA Corp. dba ALS Environmental (ALS) is not responsible for use of less than the complete report. Results apply only to the items submitted to the laboratory for analysis and individual items (samples) analyzed, as listed in the report.

Please contact me if you have any questions. My extension is 3376. You may also contact me via email at Mark.Harris@alsglobal.com.

Respectfully submitted,

ALS Group USA, Corp. dba ALS Environmental

noe D. Dan

Mark Harris Project Manager

> ADDRESS 1317 S. 13th Avenue, Kelso, WA 98626 PHONE +1 360 577 7222 | FAX +1 360 636 1068 ALS Group USA, Corp. dba ALS Environmental



Narrative Documents

ALS Environmental—Kelso Laboratory 1317 South 13th Avenue, Kelso, WA 98626 Phone (360) 577-7222 Fax (360) 425-9096 www.alsglobal.com

RIGHT SOLUTIONS | RIGHT PARTNER

Page 2 of 73



Client:Anchor QEA, LLCProject:Carson Cleaners Vapor Intrusion EvaluationSample Matrix:Soil, Water

Service Request: K2006350 Date Received: 07/28/2020

CASE NARRATIVE

All analyses were performed consistent with the quality assurance program of ALS Environmental. This report contains analytical results for samples for the Tier II level requested by the client.

Sample Receipt:

Six soil, water samples were received for analysis at ALS Environmental on 07/28/2020. Any discrepancies upon initial sample inspection are annotated on the sample receipt and preservation form included within this report. The samples were stored at minimum in accordance with the analytical method requirements.

Semivoa GC:

No significant anomalies were noted with this analysis.

Volatiles by GC/MS:

No significant anomalies were noted with this analysis.

noe D. Dan

Approved by

Date

08/11/2020



SAMPLE DETECTION SUMMARY

CLIENT ID: CC-MW-01-14.5-072420		Lab ID: K2006350-001				
Analyte	Results	Flag	MDL	MRL	Units	Method
Solids, Total	92.4				Percent	160.3 Modified
Tetrachloroethene (PCE)	2.6			0.064	mg/Kg	8260C
CLIENT ID: CC-MW-01-18-072420		Lab	ID: K2006	6350-002		
Analyte	Results	Flag	MDL	MRL	Units	Method
Solids, Total	85.1				Percent	160.3 Modified
Tetrachloroethene (PCE)	2.3			0.068	mg/Kg	8260C
CLIENT ID: CC-MW-01-24-072420		Lab	ID: K2006	6350-003		
Analyte	Results	Flag	MDL	MRL	Units	Method
Solids, Total	82.1				Percent	160.3 Modified
Tetrachloroethene (PCE)	3.1			0.070	mg/Kg	8260C
CLIENT ID: CC-MW-01-124-072420		Lab	ID: K2006	6350-004		
Analyte	Results	Flag	MDL	MRL	Units	Method
Trichloroethene (TCE)	6.3			5.9	ug/Kg	8260C
Solids, Total	82.5				Percent	160.3 Modified
Tetrachloroethene (PCE)	4.2			0.067	mg/Kg	8260C
CLIENT ID: CC-MW-01-29-072420		Lab ID: K2006350-005				
Analyte	Results	Flag	MDL	MRL	Units	Method
Gasoline Range Organics-NWTPH	11			6.9	mg/Kg	NWTPH-Gx
Trichloroethene (TCE)	25			6.1	ug/Kg	8260C
Solids, Total	85.0				Percent	160.3 Modified
Tetrachloroethene (PCE)	13			0.35	mg/Kg	8260C



Sample Receipt Information

ALS Environmental—Kelso Laboratory 1317 South 13th Avenue, Kelso, WA 98626 Phone (360) 577-7222 Fax (360) 425-9096 www.alsglobal.com

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Page 5 of 73
Client:Anchor QEA, LLCProject:Carson Cleaners Vapor Intrusion Evaluation/200544-01.01

SAMPLE CROSS-REFERENCE

<u>SAMPLE #</u>	CLIENT SAMPLE ID	DATE	<u>TIME</u>
K2006350-001	CC-MW-01-14.5-072420	7/24/2020	1055
K2006350-002	CC-MW-01-18-072420	7/24/2020	1110
K2006350-003	CC-MW-01-24-072420	7/24/2020	1125
K2006350-004	CC-MW-01-124-072420	7/24/2020	1130
K2006350-005	CC-MW-01-29-072420	7/24/2020	1140
K2006350-006	TB-01-072420	7/24/2020	

A		I I II II I I I II II II II			1 2011		C	HAI	N O)F C	USTODY	001, 002	2		SR# <u>K200635</u>	0
$\mathbf{\Lambda}$								1	11	\square	125			co	C Set of	
								I	1 \		+ZJ			cc)C#	
(ALS) Environ ELGAN	t	13	17 South	n 13th	Ave, k	<elso,< td=""><td>WA 98</td><td>3626 F</td><td>^ohone www.a</td><td>i (360) alsglol</td><td>577-7222 / 800-695-7222 bal.com</td><td>2 / FAX (360)</td><td>636-1068</td><td></td><td>Pag</td><td>e 1 of 1</td></elso,<>	WA 98	3626 F	^o hone www.a	i (360) alsglol	577-7222 / 800-695-7222 bal.com	2 / FAX (360)	636-1068		Pag	e 1 of 1
CARSON CLEANERS VAPOFUTENS Project Number 200	544-0	1.0]		4	99D											
Project Manager NATTHAN SOCCORSY] _	Ļ.	<u> 3</u> 6											
Company ANCHON QEA			ER.													
Address 1201 3PD AVE #2600, SERT	W, WA	18101	NTAII		ω	8	×									
Phone # 206 -287 -9130 LABDATA @ A	NCHIRDE	(. (cm	5	e.	d / T	ی	9									
Sampler Signature Smetty Sampler Printed Name STED LTEN STED LTEN ST	NEHL		ERO	l S	odifie	1	.HA									
CHERONNE	RETRO		NUMB	3260C /	160.3 M	NW.	LWN	_		ŝ	Remarks					
CLIENT SAMPLE ID LABID Date	PLING Time	Matrix														
1.CC-MW-01-14.5-07420 07-24-20	1055	Se	5	×	α	×	Y					1				
200-10-18-042420 07-24-7	0 1110	50	5	x	x	*)o					7				
3cc-MW-01-24-072420 07-74-20	1125	So	5	عر	\mathbf{x}	x	x					-				
4cc - MW - 01 - 124 - 072420 07-24-7	1130	50	5	Q	2	×	×]				
500 - May - 01 - 29 - 072420 07-24-2	1140	50	5	۶	λ	x	Х									
6.7B-01-072420 07-24-2	2	H20	2	×		×										
7																
8.																
9.			ļ													
10.											······································	1				
Report Requirements Invoice Info	rmation										Circ	rcle which me	tais are to be analyzed			
I. Routine Report: Method P.U.#COUT	2 000				Tota	l Meta	als: A	A L	s S	bВ	a Be B Ca Cd C	o Cr Cu	Fe Pb Mg Mn Mo Ni I	K Ag Na S	Se Sr Ti Sn V Zn Hg	
required		<u> </u>		D	issolv	red M	etals:	AI	As	Sb	Ba Be B Ca Cd	Co Cr C	u Fe Pb Ma Mn Mo Ni	iK Aq Na	Se Sr TI Sn V Zn Ho	
▲ II. Report Dup., MS, MSD as required			necía	Inst	ructio	ons/(Com	men	s.		*Indicate	State Hvo	Irocarbon Procedure AK		orthwest Øther (Cir	cle One)
III. CLP Like Summary	quireme	nts	.p.o.o.			0.70.						01010 / 190				
(no raw data)24 hr. 5 Day	48 nr.												,			
IV. Data Validation Report																
V. EDD /Requested Rep	ort Date															
Relinquished By:	By:		Re	linq	uish	ned	By:				Received By:		Relinquished	By:	Received By	:
Signature Signature Ma W)6/	Sign	ature						Si	ignat	ure		Signature		Signature	
Printed Name Printed Name S		Print	ed Na	me					P	rinte	d Name		Printed Name		Printed Name	
Firm AQ Firm 7/28/20	092	1 Firm							Fi	rm			Firm		Firm	
Date/Time 7/24/20 0430 Date/Time		Date	/Time						D	ate/1	Time		Date/Time	· ·	Date/Time	



ALS	S							PC Mt	+
	Anch	an At	Coc	ler Rece	ipt and Pres	servation Form			
Client	TICAL	or ut	1	1	Se	prvice Request K20<u>(</u>	6350	<u> </u>	
Received:	1/20/2	2 Oper	ned: <u>//26</u>	5/20	By:/	<u> <u> </u> <u> Unloaded:</u> </u>	1/28/20	_By: <u>//</u>	
1. Samples v	were received	l via? US	PS Fed		PS DHL	PDX Courier	Hand Delivere	ed	
2. Samples v	were received	l in: (circle)	Cooler	Box	Envelop	e Other		NA	
3. Were <u>cus</u>	tody seals on	coolers?	NA	Y (N	N) If yes	s, how many and where	?		
If present	, were custod	y seals intac	t?	Y N	i If	present, were they sign	ed and dated?	Y	N
بر مرکز مرکز				ant Standard				Alta da parte de contra por contra de la contr	
Temp Blank	Sample 1	Sample 2	Sample 3	Sample 4	IR GIIM	Conter / COC ID NA	Tracking	Number NA	Filed
5.1					IRO2	110425	3952-0	051 6720	
······································									
						-			
	1								
	<u> </u>						<u> </u>		
4. Packing r	nateriai: In	seris Bagg	ies Bubbl	e wrap	rel Packs	et ice Dry ice Slee	ves		
5. were cus	tody papers p	property fille	a out (ink, si	igned, etc.)		* . * .* . ** * *			N
 were san 	iples received	a in good cor If applicab	le, tissue sau	perature, un mples were	received:	icate in the table below. Frozen Partially Th	wed Thawed	NA (Y	N
7. Were all s	ample labels	complete (i.e	e analysis, p	reservation	, etc.)?			NA (Y)	N
8. Did all sa	mple labels a	nd tags agree	with custod	ly papers?	Indicate major	discrepancies in the ta	ble on page 2.	NA $(\hat{\mathbf{Y}})$	N
9. Were app	oropriate bott	les/container	s and volum	es received	for the tests in	dicated?		NA (\mathbf{Y})	Ν
10. Were the	e pH-preserve	ed bottles (see	e SMO GEN S	SOP) receiv	ed at the appro	priate pH? Indicate in	the table below	(NA) Y	N
11. Were VG	DA vials rece	ived without	headspace?	Indicate in	n the table belo	IW.		NA (Y)	N
12. Was C12	2/Res negativ	e?						NA Y	N
					e e la sue tre d'arce			<u></u>	
Sa	mple ID on Bo	ottle	9992 - 993	Sample	ID on COC		Identified by	Ś.	1.11
					·····		· · · · · · · · · · · · · · · · · · ·		
		· · · · · · · · · · · · · · · · · · ·				· · · · · · · · · · · · · · · · · · ·			
			I			I			
l		1	Rottle Count	Out of L	leart.	The Representation of the	Dancant 1	et l	1

Sample ID	Bottie Count Bottie Type	Out of Temp	Head- space	Broke	pH	Reagent	Volume added	Reagent Lot Number	Initials	Time
•										
Notes, Discrepancies, & Re	solutions: Vials	w/ í)I-1	H20	plac	red in fi	eerer	until log	rin, sh	ehre
to a freezer	MIR: 111				·					

to a freezer



Miscellaneous Forms

ALS Environmental—Kelso Laboratory 1317 South 13th Avenue, Kelso, WA 98626 Phone (360) 577-7222 Fax (360) 425-9096 www.alsglobal.com

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Inorganic Data Qualifiers

- * The result is an outlier. See case narrative.
- # The control limit criteria is not applicable. See case narrative.
- B The analyte was found in the associated method blank at a level that is significant relative to the sample result as defined by the DOD or NELAC standards.
- E The result is an estimate amount because the value exceeded the instrument calibration range.
- J The result is an estimated value.
- U The analyte was analyzed for, but was not detected ("Non-detect") at or above the MRL/MDL. DOD-QSM 4.2 definition : Analyte was not detected and is reported as less than the LOD or as defined by the project. The detection limit is adjusted for dilution.
- i The MRL/MDL or LOQ/LOD is elevated due to a matrix interference.
- X See case narrative.
- Q See case narrative. One or more quality control criteria was outside the limits.
- H The holding time for this test is immediately following sample collection. The samples were analyzed as soon as possible after receipt by the laboratory.

Metals Data Qualifiers

- # The control limit criteria is not applicable. See case narrative.
- J The result is an estimated value.
- E The percent difference for the serial dilution was greater than 10%, indicating a possible matrix interference in the sample.
- M The duplicate injection precision was not met.
- N The Matrix Spike sample recovery is not within control limits. See case narrative.
- S The reported value was determined by the Method of Standard Additions (MSA).
- U The analyte was analyzed for, but was not detected ("Non-detect") at or above the MRL/MDL.
- DOD-QSM 4.2 definition : Analyte was not detected and is reported as less than the LOD or as defined by the project. The detection limit is adjusted for dilution.
- W The post-digestion spike for furnace AA analysis is out of control limits, while sample absorbance is less than 50% of spike absorbance.
- $i \,$ $\,$ The MRL/MDL or LOQ/LOD is elevated due to a matrix interference.
- X See case narrative.
- + The correlation coefficient for the MSA is less than 0.995.
- Q See case narrative. One or more quality control criteria was outside the limits.

Organic Data Qualifiers

- * The result is an outlier. See case narrative.
- # The control limit criteria is not applicable. See case narrative.
- A A tentatively identified compound, a suspected aldol-condensation product.
- B The analyte was found in the associated method blank at a level that is significant relative to the sample result as defined by the DOD or NELAC standards.
- C The analyte was qualitatively confirmed using GC/MS techniques, pattern recognition, or by comparing to historical data.
- D The reported result is from a dilution.
- E The result is an estimated value.
- J The result is an estimated value.
- N The result is presumptive. The analyte was tentatively identified, but a confirmation analysis was not performed.
- P The GC or HPLC confirmation criteria was exceeded. The relative percent difference is greater than 40% between the two analytical results.
- U The analyte was analyzed for, but was not detected ("Non-detect") at or above the MRL/MDL.
 DOD-QSM 4.2 definition : Analyte was not detected and is reported as less than the LOD or as defined by the project. The detection limit is adjusted for dilution.
- i The MRL/MDL or LOQ/LOD is elevated due to a chromatographic interference.
- X See case narrative.
- Q See case narrative. One or more quality control criteria was outside the limits.

Additional Petroleum Hydrocarbon Specific Qualifiers

- ${f F}$ The chromatographic fingerprint of the sample matches the elution pattern of the calibration standard.
- L The chromatographic fingerprint of the sample resembles a petroleum product, but the elution pattern indicates the presence of a greater amount of lighter molecular weight constituents than the calibration standard.
- H The chromatographic fingerprint of the sample resembles a petroleum product, but the elution pattern indicates the presence of a greater amount of heavier molecular weight constituents than the calibration standard.
- O The chromatographic fingerprint of the sample resembles an oil, but does not match the calibration standard.
- Y The chromatographic fingerprint of the sample resembles a petroleum product eluting in approximately the correct carbon range, but the elution pattern does not match the calibration standard.
- Z The chromatographic fingerprint does not resemble a petroleum product.

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ALS Group USA Corp. dba ALS Environmental (ALS) - Kelso State Certifications, Accreditations, and Licenses

Web Site	Number
http://dec.alaska.gov/eh/lab/cs/csapproval.htm	UST-040
http://www.azdhs.gov/lab/license/env.htm	AZ0339
http://www.adeq.state.ar.us/techsvs/labcert.htm	88-0637
http://www.cdph.ca.gov/certlic/labs/Pages/ELAP.aspx	2795
http://www.denix.osd.mil/edqw/Accreditation/AccreditedLabs.cfm	L16-58-R4
http://www.doh.state.fl.us/lab/EnvLabCert/WaterCert.htm	E87412
http://health.hawaii.gov/	-
http://www.pjlabs.com/	L16-57
http://www.deq.louisiana.gov/page/la-lab-accreditation	03016
http://www.maine.gov/dhhs/	WA01276
http://www.health.state.mn.us/accreditation	053-999-457
http://ndep.nv.gov/bsdw/labservice.htm	WA01276
http://www.nj.gov/dep/enforcement/oqa.html	WA005
https://www.wadsworth.org/regulatory/elap	12060
https://deq.nc.gov/about/divisions/water-resources/water-resources- data/water-sciences-home-page/laboratory-certification-branch/non-field-lab- certification	605
http://www.deq.state.ok.us/CSDnew/labcert.htm	9801
http://public.health.oregon.gov/LaboratoryServices/EnvironmentalLaborator yAccreditation/Pages/index.aspx	WA100010
http://www.scdhec.gov/environment/EnvironmentalLabCertification/	61002
http://www.tceq.texas.gov/field/qa/env_lab_accreditation.html	T104704427
http://www.ecy.wa.gov/programs/eap/labs/lab-accreditation.html	C544
https://www.epa.gov/region8-waterops/epa-region-8-certified-drinking-water	-
www.alsglobal.com	NA
	Web Site http://dec.alaska.gov/eh/lab/cs/csapproval.htm http://www.azdhs.gov/lab/license/env.htm http://www.azdhs.gov/lab/license/env.htm http://www.adeq.state.ar.us/techsvs/labcert.htm http://www.deq.state.ar.us/techsvs/labcert.htm http://www.denix.osd.mil/edqw/Accreditation/AccreditedLabs.cfm http://www.denix.osd.mil/edqw/Accreditation/AccreditedLabs.cfm http://www.doh.state.fl.us/lab/EnvLabCert/WaterCert.htm http://health.hawaii.gov/ http://www.pilabs.com/ http://www.maine.gov/dhs/ http://www.maine.gov/dhs/ http://www.health.state.mn.us/accreditation http://www.health.state.mn.us/accreditation http://www.nj.gov/bsdw/labservice.htm http://www.nj.gov/dep/enforcement/oqa.html http://www.nj.gov/dep/enforcement/oqa.html http://www.adsworth.org/regulatory/elap http://www.adsworth.org/regulatory/elap http://www.ads_state.ok.us/CSDnew/labcert.htm http://www.deq.state.ok.us/CSDnew/labcert.htm http://www.deq.state.ok.us/CSDnew/labcert.htm http://www.scdhec.gov/environment/EnvironmentalLabCertification/ http://www.scdhec.gov/environment/EnvironmentalLabCertification/ http://www.scdhec.gov/programs/eap/labs/lab-acc

Analyses were performed according to our laboratory's NELAP-approved quality assurance program. A complete listing of specific NELAP-certified analytes, can be found in the certification section at www.ALSGlobal.com or at the accreditation bodies web site.

Please refer to the certification and/or accreditation body's web site if samples are submitted for compliance purposes. The states highlighted above, require the analysis be listed on the state certification if used for compliance purposes and if the method/anlayte is offered by that state.

Acronyms

ASTM	American Society for Testing and Materials
A2LA	American Association for Laboratory Accreditation
CARB	California Air Resources Board
CAS Number	Chemical Abstract Service registry Number
CFC	Chlorofluorocarbon
CFU	Colony-Forming Unit
DEC	Department of Environmental Conservation
DEQ	Department of Environmental Quality
DHS	Department of Health Services
DOE	Department of Ecology
DOH	Department of Health
EPA	U. S. Environmental Protection Agency
ELAP	Environmental Laboratory Accreditation Program
GC	Gas Chromatography
GC/MS	Gas Chromatography/Mass Spectrometry
LOD	Limit of Detection
LOQ	Limit of Quantitation
LUFT	Leaking Underground Fuel Tank
M MCL	Modified Maximum Contaminant Level is the highest permissible concentration of a substance allowed in drinking water as established by the USEPA.
MDL	Method Detection Limit
MPN	Most Probable Number
MRL	Method Reporting Limit
NA	Not Applicable
NC	Not Calculated
NCASI	National Council of the Paper Industry for Air and Stream Improvement
ND	Not Detected
NIOSH	National Institute for Occupational Safety and Health
PQL	Practical Quantitation Limit
RCRA	Resource Conservation and Recovery Act
SIM	Selected Ion Monitoring
TPH tr	Total Petroleum Hydrocarbons Trace level is the concentration of an analyte that is less than the PQL but greater than or equal to the MDL.

ALS Group USA, Corp.

dba ALS Environmental

Analyst Summary report

Client:	Anchor QEA, LLC	Service Request:	K2006350
Project:	Carson Cleaners Vapor Intrusion Evaluation/200544-01.01		

Sample Name:	CC-MW-01-14.5-072420	Date Collected:	07/24/20
Lab Code:	K2006350-001	Date Received:	07/28/20
Sample Matrix:	Soil		

Analysis Method		Extracted/Digested By	Analyzed By
160.3 Modified			TANDREWS
8260C			JJAMES
8260C			KWINSTON
NWTPH-Dx		KVAN	TPOTTSCHMIDT
NWTPH-Gx			KWINSTON
Sample Name:	CC-MW-01-18-072420	Da	ate Collected: 07/24/20
Lab Code:	K2006350-002	D	ate Received: 07/28/20
Sample Matrix:	Soil		
Analysis Method		Extracted/Digested By	Analyzed By
160.3 Modified			TANDREWS
8260C			KWINSTON
8260C			JJAMES
NWTPH-Dx		KVAN	TPOTTSCHMIDT
NWTPH-Gx			KWINSTON
Sample Name:	CC-MW-01-24-072420	Da	ate Collected: 07/24/20
Lab Code:	K2006350-003	D	ate Received: 07/28/20
Sample Matrix:	Soil		
Analysis Method		Extracted/Digested By	Analyzed By
160.3 Modified			TANDREWS
8260C			KWINSTON
8260C			JJAMES
NWTPH-Dx		KVAN	TPOTTSCHMIDT
NWTPH-Gx			KWINSTON

ALS Group USA, Corp.

dba ALS Environmental

Analyst Summary report

Client: Project:	Anchor QEA, LLC Carson Cleaners Vapor Intrusion Fy	valuation/200544-01.01	Service Request: K2006350
Tiojeet.	Curson Cleaners vapor initiasion Ex		
Sample Name:	CC-MW-01-124-072420		Date Collected: 07/24/20
Lab Code:	K2006350-004		Date Received: 07/28/20
Sample Matrix:	Soil		
Analysis Method		Extracted/Digested By	Analyzed By
160.3 Modified			TANDREWS
8260C			KWINSTON
8260C			JJAMES
NWTPH-Dx		KVAN	TPOTTSCHMIDT
NWTPH-Gx			KWINSTON
Sample Name:	CC-MW-01-29-072420		Date Collected: 07/24/20
Lab Code:	K2006350-005		Date Received: 07/28/20
Sample Matrix:	Soil		
Analysis Method		Extracted/Digested By	Analyzed By
160.3 Modified			TANDREWS
8260C			KWINSTON
8260C			JJAMES

Sample Name:	CC-MW-01-29-072420
Lab Code:	K2006350-005.R01
Sample Matrix:	Soil

Analysis Method 8260C

NWTPH-Dx

NWTPH-Gx

Sample Name: TB-01-072420 Lab Code: K2006350-006 Sample Matrix: Water

Date Collected: 07/24/20 **Date Received:** 07/28/20

Extracted/Digested By

KVAN

Analyzed By JJAMES

TPOTTSCHMIDT

KWINSTON

Date Collected: 07/24/20 **Date Received:** 07/28/20

Analysis Method Extracted/Digested By Analyzed By 8260C JJAMES NWTPH-Gx **KWINSTON** Printed 8/11/2020 10:10:03 AM

Superset Reference:20-0000557467 rev 00



Sample Results

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Volatile Organic Compounds by GC/MS

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Analytical Report

Client:	Anchor QEA, LLC	Service Request: K2006350
Project:	Carson Cleaners Vapor Intrusion Evaluation/200544-01.01	Date Collected: 07/24/20 10:55
Sample Matrix:	Soil	Date Received: 07/28/20 09:20
Sample Name:	CC-MW-01-14.5-072420	Units: mg/Kg
Lab Code:	K2006350-001	Basis: Dry

Analysis Method:	8260C
Prep Method:	EPA 5035A/5030B

Analyte Name	Result	MRL	Dil.	Date Analyzed	Date Extracted	Q
Tetrachloroethene (PCE)	2.6	0.064	1	08/06/20 19:28	7/24/20	
Surrogate Name		% Rec	Control Lin	nits Date Ar	nalyzed Q	
Dibromofluoromethane		95	55 - 132	08/06/2	0 19:28	
Toluene-d8		105	81 - 124	08/06/2	0 19:28	
4-Bromofluorobenzene		88	64 - 132	08/06/2	0 19:28	

Analytical Report

Client:	Anchor QEA, LLC	Service Request: K2006350
Project:	Carson Cleaners Vapor Intrusion Evaluation/200544-01.01	Date Collected: 07/24/20 11:10
Sample Matrix:	Soil	Date Received: 07/28/20 09:20
Sample Name:	CC-MW-01-18-072420	Units: mg/Kg
Lab Code:	K2006350-002	Basis: Dry

Analysis Method:	8260C
Prep Method:	EPA 5035A/5030B

Analyte Name	Result	MRL	Dil. D	ate Analyzed	Date Extracted	Q
Tetrachloroethene (PCE)	2.3	0.068	1 0	8/06/20 19:55	7/24/20	
Surrogate Name		% Rec	Control Limi	its Date Aı	nalyzed Q	
Dibromofluoromethane		98	55 - 132	08/06/2	0 19:55	
Toluene-d8		104	81 - 124	08/06/2	0 19:55	
4-Bromofluorobenzene		88	64 - 132	08/06/2	0 19:55	

Analytical Report

Client:	Anchor QEA, LLC	Service Request: K2006350
Project:	Carson Cleaners Vapor Intrusion Evaluation/200544-01.01	Date Collected: 07/24/20 11:25
Sample Matrix:	Soil	Date Received: 07/28/20 09:20
Sample Name:	CC-MW-01-24-072420	Units: mg/Kg
Lab Code:	K2006350-003	Basis: Dry

Analysis Method:	8260C
Prep Method:	EPA 5035A/5030B

Analyte Name	Result	MRL	Dil. D	Date Analyzed	Date Extracted	Q
Tetrachloroethene (PCE)	3.1	0.070	1 0	8/06/20 20:21	7/24/20	
Surrogate Name		% Rec	Control Lim	its Date Aı	nalyzed Q	
Dibromofluoromethane		92	55 - 132	08/06/2	0 20:21	
Toluene-d8		102	81 - 124	08/06/2	0 20:21	
4-Bromofluorobenzene		91	64 - 132	08/06/2	0 20:21	

Analytical Report

Client:	Anchor QEA, LLC	Service Request: K2006350
Project:	Carson Cleaners Vapor Intrusion Evaluation/200544-01.01	Date Collected: 07/24/20 11:30
Sample Matrix:	Soil	Date Received: 07/28/20 09:20
Sample Name:	CC-MW-01-124-072420	Units: mg/Kg
Lab Code:	K2006350-004	Basis: Dry

Analysis Method:	8260C
Prep Method:	EPA 5035A/5030B

Analyte Name	Result	MRL	Dil. D	ate Analyzed	Date Extracted	Q
Tetrachloroethene (PCE)	4.2	0.067	1 0	8/06/20 20:48	7/24/20	
Surrogate Name		% Rec	Control Limi	its Date Aı	nalyzed Q	
Dibromofluoromethane		93	55 - 132	08/06/2	0 20:48	
Toluene-d8		103	81 - 124	08/06/2	0 20:48	
4-Bromofluorobenzene		87	64 - 132	08/06/2	0 20:48	

Analytical Report

Client:	Anchor QEA, LLC	Service Request:	K2006350
Project:	Carson Cleaners Vapor Intrusion Evaluation/200544-01.01	Date Collected:	07/24/20 11:40
Sample Matrix:	Soil	Date Received:	07/28/20 09:20
Sample Name:	CC-MW-01-29-072420	Units:	mg/Kg
Lab Code:	K2006350-005	Basis:	Dry

Analysis Method:	8260C
Prep Method:	EPA 5035A/5030B

Analyte Name	Result	MRL	Dil. I	Date Analyzed	Date Ex	tracted	Q
Tetrachloroethene (PCE)	13	0.35	1 (08/07/20 13:36	7/24	/20	
Surrogate Name		% Rec	Control Lim	its Date Aı	nalyzed	Q	
Dibromofluoromethane		96	55 - 132	08/07/2	0 13:36		
Toluene-d8		101	81 - 124	08/07/2	0 13:36		
4-Bromofluorobenzene		88	64 - 132	08/07/2	0 13:36		

Analytical Report

Client:	Anchor QEA, LLC	Service Request: K2006350
Project:	Carson Cleaners Vapor Intrusion Evaluation/200544-01.01	Date Collected: 07/24/20 10:55
Sample Matrix:	Soil	Date Received: 07/28/20 09:20
Sample Name:	CC-MW-01-14.5-072420	Units: ug/Kg
Lab Code:	K2006350-001	Basis: Dry

Analysis Method:	8260C
Prep Method:	None

Analyte Name	Result	MRL	Dil.	Date Analyzed	Q
Trichloroethene (TCE)	ND U	5.8	1	07/30/20 13:39	
Vinyl Chloride	ND U	5.8	1	07/30/20 13:39	
cis-1,2-Dichloroethene	ND U	5.8	1	07/30/20 13:39	
trans-1,2-Dichloroethene	ND U	5.8	1	07/30/20 13:39	

Surrogate Name	% Rec	Control Limits	Date Analyzed	Q
4-Bromofluorobenzene	100	88 - 127	07/30/20 13:39	
Dibromofluoromethane	99	82 - 146	07/30/20 13:39	
Toluene-d8	101	90 - 142	07/30/20 13:39	

Analytical Report

Client:	Anchor QEA, LLC	Service Request: K2006350
Project:	Carson Cleaners Vapor Intrusion Evaluation/200544-01.01	Date Collected: 07/24/20 11:10
Sample Matrix:	Soil	Date Received: 07/28/20 09:20
Sample Name:	CC-MW-01-18-072420	Units: ug/Kg
Lab Code:	K2006350-002	Basis: Dry

Analysis Method:	8260C
Prep Method:	None

Analyte Name	Result	MRL	Dil.	Date Analyzed	Q
Trichloroethene (TCE)	ND U	5.9	1	07/30/20 14:00	
Vinyl Chloride	ND U	5.9	1	07/30/20 14:00	
cis-1,2-Dichloroethene	ND U	5.9	1	07/30/20 14:00	
trans-1,2-Dichloroethene	ND U	5.9	1	07/30/20 14:00	

Surrogate Name	% Rec	Control Limits	Date Analyzed	Q
4-Bromofluorobenzene	98	88 - 127	07/30/20 14:00	
Dibromofluoromethane	103	82 - 146	07/30/20 14:00	
Toluene-d8	102	90 - 142	07/30/20 14:00	

Analytical Report

Client:	Anchor QEA, LLC	Service Request: K2006350
Project:	Carson Cleaners Vapor Intrusion Evaluation/200544-01.01	Date Collected: 07/24/20 11:25
Sample Matrix:	Soil	Date Received: 07/28/20 09:20
Sample Name:	CC-MW-01-24-072420	Units: ug/Kg
Lab Code:	K2006350-003	Basis: Dry

Analysis Method:	8260C
Prep Method:	None

Analyte Name	Result	MRL	Dil.	Date Analyzed	Q
Trichloroethene (TCE)	ND U	6.4	1	07/30/20 14:21	
Vinyl Chloride	ND U	6.4	1	07/30/20 14:21	
cis-1,2-Dichloroethene	ND U	6.4	1	07/30/20 14:21	
trans-1,2-Dichloroethene	ND U	6.4	1	07/30/20 14:21	

Surrogate Name	% Rec	Control Limits	Date Analyzed	Q
4-Bromofluorobenzene	99	88 - 127	07/30/20 14:21	
Dibromofluoromethane	101	82 - 146	07/30/20 14:21	
Toluene-d8	101	90 - 142	07/30/20 14:21	

Analytical Report

Client:	Anchor QEA, LLC	Service Request: K2006350
Project:	Carson Cleaners Vapor Intrusion Evaluation/200544-01.01	Date Collected: 07/24/20 11:30
Sample Matrix:	Soil	Date Received: 07/28/20 09:20
Sample Name:	CC-MW-01-124-072420	Units: ug/Kg
Lab Code:	K2006350-004	Basis: Dry

Analysis Method:	8260C
Prep Method:	None

Analyte Name	Result	MRL	Dil.	Date Analyzed	Q
Trichloroethene (TCE)	6.3	5.9	1	07/30/20 14:42	
Vinyl Chloride	ND U	5.9	1	07/30/20 14:42	
cis-1,2-Dichloroethene	ND U	5.9	1	07/30/20 14:42	
trans-1,2-Dichloroethene	ND U	5.9	1	07/30/20 14:42	

Surrogate Name	% Rec	Control Limits	Date Analyzed	Q
4-Bromofluorobenzene	101	88 - 127	07/30/20 14:42	
Dibromofluoromethane	97	82 - 146	07/30/20 14:42	
Toluene-d8	100	90 - 142	07/30/20 14:42	

Analytical Report

Client:	Anchor QEA, LLC	Service Request: K2006350
Project:	Carson Cleaners Vapor Intrusion Evaluation/200544-01.01	Date Collected: 07/24/20 11:40
Sample Matrix:	Soil	Date Received: 07/28/20 09:20
Sample Name:	CC-MW-01-29-072420	Units: ug/Kg
Lab Code:	K2006350-005	Basis: Dry

Analysis Method:	8260C
Prep Method:	None

Analyte Name	Result	MRL	Dil.	Date Analyzed	Q
Trichloroethene (TCE)	25	6.1	1	07/30/20 15:02	
Vinyl Chloride	ND U	6.1	1	07/30/20 15:02	
cis-1,2-Dichloroethene	ND U	6.1	1	07/30/20 15:02	
trans-1,2-Dichloroethene	ND U	6.1	1	07/30/20 15:02	

Surrogate Name	% Rec	Control Limits	Date Analyzed	Q
4-Bromofluorobenzene	99	88 - 127	07/30/20 15:02	
Dibromofluoromethane	101	82 - 146	07/30/20 15:02	
Toluene-d8	102	90 - 142	07/30/20 15:02	

Analytical Report

Client:	Anchor QEA, LLC	Service Request:	K2006350
Project:	Carson Cleaners Vapor Intrusion Evaluation/200544-01.01	Date Collected:	07/24/20
Sample Matrix:	Water	Date Received:	07/28/20 09:20
Sample Name:	TB-01-072420	Units:	ug/L
Lab Code:	K2006350-006	Basis:	NA

Analysis Method:	8260C
Prep Method:	None

Analyte Name	Result	MRL	Dil.	Date Analyzed	Q
Tetrachloroethene (PCE)	ND U	0.50	1	08/05/20 16:44	
Trichloroethene (TCE)	ND U	0.50	1	08/05/20 16:44	
Vinyl Chloride	ND U	0.50	1	08/05/20 16:44	
cis-1,2-Dichloroethene	ND U	0.50	1	08/05/20 16:44	
trans-1,2-Dichloroethene	ND U	0.50	1	08/05/20 16:44	

Surrogate Name	% Rec	Control Limits	Date Analyzed	Q
4-Bromofluorobenzene	87	68 - 117	08/05/20 16:44	
Dibromofluoromethane	97	73 - 122	08/05/20 16:44	
Toluene-d8	103	65 - 144	08/05/20 16:44	

	Analytica	al Report			
Client:	Anchor QEA, LLC		Service Request:	K2006350	
Project:	Carson Cleaners Vapor Intrusion Evaluation/200	544-01.01	Date Collected:	07/24/20 10:55	
Sample Matrix:	Soil		Date Received:	07/28/20 09:20	
Sample Name:	CC-MW-01-14.5-072420		Units:	mg/Kg	
Lab Code:	K2006350-001		Basis:	Dry	
	Volatile Petroleum Products Method	for Soil and Water for	the Northwest		
Analysis Method:	NWTPH-Gx				
Prep Method:	None				
Analyte Name	Result	MRL	Dil. Date	Analyzed (Q

Gasoline Range Organics-NWTPH	ND U	6.4	59 07/29/20	18:45	
Surrogate Name	% Rec	Control Limits	Date Analyzed	Q	
4-Bromofluorobenzene	98	50 - 150	07/29/20 18:45		

	Analytical Report		
Client:	Anchor QEA, LLC	Service Request:	K2006350
Project:	Carson Cleaners Vapor Intrusion Evaluation/200544-01.01	Date Collected:	07/24/20 11:10
Sample Matrix:	Soil	Date Received:	07/28/20 09:20
Sample Name:	CC-MW-01-18-072420	Units:	mg/Kg
Lab Code:	K2006350-002	Basis:	Dry
	Volatile Petroleum Products Method for Soil and Water for the	e Northwest	
Analysis Method:	NWTPH-Gx		
Prep Method:	None		

Analyte Name	Result	MRL	Dil.	Date Ana	lyzed	Q
Gasoline Range Organics-NWTPH	ND U	6.8	58	07/29/20	19:33	
Surrogate Name	% Rec	Control Limits	Da	te Analyzed	Q	
4-Bromofluorobenzene	93	50 - 150	07	/29/20 19:33		

		Analytical Report				
Client:	Anchor QEA, LLC			Service Request	K2006350	
Project:	Carson Cleaners Vapor Intrusion Eva	luation/200544-01.01		Date Collected	07/24/20 11:25	
Sample Matrix:	Soil			Date Received	07/28/20 09:20	
Sample Name:	CC-MW-01-24-072420			Units	mg/Kg	
Lab Code:	K2006350-003			Basis	Dry	
	Volatile Petroleum Produc	ts Method for Soil a	nd Water for the	Northwest		
Analysis Method:	NWTPH-Gx					
Prep Method:	None					
Analyte Name	R	esult	MRL	Dil. Date	Analyzed	Q

Gasoline Range Organics-NWTPH	ND U	6.9	57 07/29/20) 19:57	
Surrogate Name	% Rec	Control Limits	Date Analyzed	Q	
4-Bromofluorobenzene	93	50 - 150	07/29/20 19:57		

		Analytical F	Report			
Client:	Anchor QEA, LLC			Service	Request: K2006350	
Project:	Carson Cleaners Vapor Intr	usion Evaluation/20054	4-01.01	Date	Collected: 07/24/20 11	:30
Sample Matrix:	Soil			Date	Received: 07/28/20 09	:20
Sample Name:	CC-MW-01-124-072420				Units: mg/Kg	
Lab Code:	K2006350-004				Basis: Dry	
	Volatile Petroleu	m Products Method for	Soil and Water for	the Northw	est	
Analysis Method:	NWTPH-Gx					
Prep Method:	None					
Analyte Name		Result	MRL	Dil.	Date Analyzed	Q
Gasoline Range Orga	anics-NWTPH	ND U	6.7	55	07/29/20 20:21	

Surrogate Name	% Rec	Control Limits	Date Analyzed	Q
4-Bromofluorobenzene	96	50 - 150	07/29/20 20:21	

		Analytical	Report			
Client:	Anchor QEA, LLC			Service	Request: K2006350	
Project:	Carson Cleaners Vapor Int	rusion Evaluation/20054	44-01.01	Date	Collected: 07/24/20 11	:40
Sample Matrix:	Soil			Date	Received: 07/28/20 09	:20
Sample Name:	CC-MW-01-29-072420				Units: mg/Kg	
Lab Code:	K2006350-005				Basis: Dry	
	Volatile Petroleu	m Products Method fo	or Soil and Water for	the Northw	est	
Analysis Method:	NWTPH-Gx					
Prep Method:	None					
Analyte Name		Result	MRL	Dil.	Date Analyzed	Q
Gasoline Range Orga	anics-NWTPH	11	6.9	59	07/29/20 20:45	

Surrogate Name	% Rec	Control Limits	Date Analyzed	Q
4-Bromofluorobenzene	97	50 - 150	07/29/20 20:45	

		Analytical R	eport				
Client:	Anchor QEA, LLC			Service	Request: K	K2006350	
Project:	Carson Cleaners Vapor	Intrusion Evaluation/200544	4-01.01	Date (Collected: 0	7/24/20	
Sample Matrix:	Water			Date	Received: 0	7/28/20 09:	20
Sample Name:	TB-01-072420				Units: u	g/L	
Lab Code:	K2006350-006				Basis: N	JA	
	Volatile Petro	leum Products Method for	Soil and Water for	the Northw	est		
Analysis Method:	NWTPH-Gx						
Prep Method:	None						
Analyte Name		Result	MRL	Dil.	Date Ai	nalyzed	Q
Gasoline Range Orga	nics-NWTPH	ND U	250	1	07/29/2	0 13:55	

Surrogate Name	% Rec	Control Limits	Date Analyzed	Q
1,4-Difluorobenzene	92	50 - 150	07/29/20 13:55	



Semivolatile Organic Compounds by GC

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Analytical Report

K2006350
07/24/20 10:55
07/28/20 09:20
mg/Kg
Dry
()

Analysis Method:	NWTPH-Dx
Prep Method:	EPA 3550B

Analyte Name	Result	MRL	Dil.	Date Analyzed	Date Extracted	Q
Diesel Range Organics (DRO)	ND U	27	1	08/05/20 20:29	7/30/20	
Residual Range Organics (RRO)	ND U	110	1	08/05/20 20:29	7/30/20	

Surrogate Name	% Rec	Control Limits	Date Analyzed	Q
o-Terphenyl	86	50 - 150	08/05/20 20:29	
n-Triacontane	88	50 - 150	08/05/20 20:29	

Analytical Report

Client:	Anchor QEA, LLC	Service Request: K2006350
Project:	Carson Cleaners Vapor Intrusion Evaluation/200544-01.01	Date Collected: 07/24/20 11:10
Sample Matrix:	Soil	Date Received: 07/28/20 09:20
Sample Name:	CC-MW-01-18-072420	Units: mg/Kg
Lab Code:	K2006350-002	Basis: Dry

Analysis Method:	NWTPH-Dx
Prep Method:	EPA 3550B

Analyte Name	Result	MRL	Dil.	Date Analyzed	Date Extracted	Q
Diesel Range Organics (DRO)	ND U	30	1	08/05/20 20:51	7/30/20	
Residual Range Organics (RRO)	ND U	120	1	08/05/20 20:51	7/30/20	

Surrogate Name	% Rec	Control Limits	Date Analyzed	Q
o-Terphenyl	96	50 - 150	08/05/20 20:51	
n-Triacontane	96	50 - 150	08/05/20 20:51	

Analytical Report

Client:	Anchor QEA, LLC	Service Request: K2006350
Project:	Carson Cleaners Vapor Intrusion Evaluation/200544-01.01	Date Collected: 07/24/20 11:25
Sample Matrix:	Soil	Date Received: 07/28/20 09:20
Sample Name:	CC-MW-01-24-072420	Units: mg/Kg
Lab Code:	K2006350-003	Basis: Dry

Analysis Method:	NWTPH-Dx
Prep Method:	EPA 3550B

Analyte Name	Result	MRL	Dil.	Date Analyzed	Date Extracted	Q
Diesel Range Organics (DRO)	ND U	31	1	08/05/20 21:34	7/30/20	
Residual Range Organics (RRO)	ND U	130	1	08/05/20 21:34	7/30/20	

Surrogate Name	% Rec	Control Limits	Date Analyzed	Q
o-Terphenyl	95	50 - 150	08/05/20 21:34	
n-Triacontane	95	50 - 150	08/05/20 21:34	

Analytical Report

Client:	Anchor QEA, LLC	Service Request:	K2006350
Project:	Carson Cleaners Vapor Intrusion Evaluation/200544-01.01	Date Collected:	07/24/20 11:30
Sample Matrix:	Soil	Date Received:	07/28/20 09:20
Sample Name: Lab Code:	CC-MW-01-124-072420 K2006350-004	Units: Basis:	mg/Kg Drv
Lub Couc.	112000330 001	Da515.	219

Analysis Method:	NWTPH-Dx
Prep Method:	EPA 3550B

Analyte Name	Result	MRL	Dil.	Date Analyzed	Date Extracted	Q
Diesel Range Organics (DRO)	ND U	31	1	08/05/20 21:55	7/30/20	
Residual Range Organics (RRO)	ND U	130	1	08/05/20 21:55	7/30/20	

Surrogate Name	% Rec	Control Limits	Date Analyzed	Q
o-Terphenyl	98	50 - 150	08/05/20 21:55	
n-Triacontane	98	50 - 150	08/05/20 21:55	

Analytical Report

Client:	Anchor QEA, LLC	Service Request: K	2006350
Project:	Carson Cleaners Vapor Intrusion Evaluation/200544-01.01	Date Collected: 0	7/24/20 11:40
Sample Matrix:	Soil	Date Received: 0	7/28/20 09:20
Sample Name:	CC-MW-01-29-072420	Units: n	ng/Kg
Lab Code:	K2006350-005	Basis: D	Dry

Analysis Method:	NWTPH-Dx
Prep Method:	EPA 3550B

Analyte Name	Result	MRL	Dil.	Date Analyzed	Date Extracted	Q
Diesel Range Organics (DRO)	ND U	30	1	08/05/20 22:16	7/30/20	
Residual Range Organics (RRO)	ND U	120	1	08/05/20 22:16	7/30/20	

Surrogate Name	% Rec	Control Limits	Date Analyzed	Q
o-Terphenyl	94	50 - 150	08/05/20 22:16	
n-Triacontane	95	50 - 150	08/05/20 22:16	



General Chemistry

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Analytical Report

Client:Anchor QEA, LLCProject:Carson Cleaners Vapor Intrusion Evaluation/200544-01.01Sample Matrix:Soil

Service Request: K2006350 Date Collected: 07/24/20 10:55 Date Received: 07/28/20 09:20

Basis: As Received

 Sample Name:
 CC-MW-01-14.5-072420

 Lab Code:
 K2006350-001

Inorganic Parameters

Analyte Name	Analysis Method	Result	Units	MRL	Dil.	Date Analyzed	Q
Solids, Total	160.3 Modified	92.4	Percent	-	1	07/29/20 17:35	
Analytical Report

Client:Anchor QEA, LLCProject:Carson Cleaners Vapor Intrusion Evaluation/200544-01.01Sample Matrix:Soil

Service Request: K2006350 Date Collected: 07/24/20 11:10 Date Received: 07/28/20 09:20

Basis: As Received

 Sample Name:
 CC-MW-01-18-072420

 Lab Code:
 K2006350-002

Analyte Name	Analysis Method	Result	Units	MRL	Dil.	Date Analyzed	Q
Solids, Total	160.3 Modified	85.1	Percent	-	1	07/29/20 17:35	

Analytical Report

Client:Anchor QEA, LLCProject:Carson Cleaners Vapor Intrusion Evaluation/200544-01.01Sample Matrix:Soil

Service Request: K2006350 Date Collected: 07/24/20 11:25 Date Received: 07/28/20 09:20

Basis: As Received

 Sample Name:
 CC-MW-01-24-072420

 Lab Code:
 K2006350-003

Analyte Name	Analysis Method	Result	Units	MRL	Dil.	Date Analyzed	Q
Solids, Total	160.3 Modified	82.1	Percent	-	1	07/29/20 17:35	

Analytical Report

Client:Anchor QEA, LLCProject:Carson Cleaners Vapor Intrusion Evaluation/200544-01.01Sample Matrix:Soil

Service Request: K2006350 Date Collected: 07/24/20 11:30 Date Received: 07/28/20 09:20

-20

Basis: As Received

 Sample Name:
 CC-MW-01-124-072420

 Lab Code:
 K2006350-004

Analyte Name	Analysis Method	Result	Units	MRL	Dil.	Date Analyzed	Q
Solids, Total	160.3 Modified	82.5	Percent	-	1	07/29/20 17:35	

Analytical Report

Client:Anchor QEA, LLCProject:Carson Cleaners Vapor Intrusion Evaluation/200544-01.01Sample Matrix:Soil

 Service Request:
 K2006350

 Date Collected:
 07/24/20 11:40

 Date Received:
 07/28/20 09:20

Basis: As Received

 Sample Name:
 CC-MW-01-29-072420

 Lab Code:
 K2006350-005

Analyte Name	Analysis Method	Result	Units	MRL	Dil.	Date Analyzed	Q
Solids, Total	160.3 Modified	85.0	Percent	-	1	07/29/20 17:35	



QC Summary Forms

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Volatile Organic Compounds by GC/MS

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QA/QC Report

Client:Anchor QEA, LLCProject:Carson Cleaners Vapor Intrusion Evaluation/200544-01.01Sample Matrix:Soil

Service Request: K2006350

SURROGATE RECOVERY SUMMARY

Volatile Organic Compounds

Analysis Method:	8260C
Extraction Method:	EPA 5035A/5030B

		4-Bromofluorobenzene	Dibromofluoromethane	Toluene-d8
Sample Name	Lab Code	64 - 132	55 - 132	81 - 124
CC-MW-01-14.5-072420	K2006350-001	88	95	105
CC-MW-01-18-072420	K2006350-002	88	98	104
CC-MW-01-24-072420	K2006350-003	91	92	102
CC-MW-01-124-072420	K2006350-004	87	93	103
CC-MW-01-29-072420	K2006350-005	88	96	101
CC-MW-01-29-072420 MS	KWG2002313-1	90	100	102
CC-MW-01-29-072420 DMS	KWG2002313-2	90	100	105
Lab Control Sample	KWG2002313-3	90	96	104
Duplicate Lab Control Sample	KWG2002313-4	93	99	102
Method Blank	KWG2002313-5	88	97	104
Lab Control Sample	KWG2002331-1	92	99	101
Duplicate Lab Control Sample	KWG2002331-2	91	98	101
Method Blank	KWG2002331-3	87	96	103

QA/QC Report

Client:	Anchor QEA, LLC					Servic	e Request	K20	06350	
Project:	Carson Cleaners Va	por Intrus	ion Evaluation	/200544-0	1.01	Date (Collected:	07/2	4/20	
Sample Matrix:	Soil					Date I	Received:	07/2	8/20	
						Date A	Analyzed:	08/6	/20	
						Date I	Extracted:	07/2	4/20	
			Duplicate Ma	atrix Spik	e Summar	y				
			Volatile O	rganic Co	mpounds					
Sample Name:	CC-MW-01-29-072	420					Units:	mg/l	Kg	
Lab Code:	K2006350-005						Basis:	Dry		
Analysis Method:	8260C									
Prep Method:	EPA 5035A/5030B									
			Matrix Sp KWG20023	ike 13-1	Dı	uplicate Mat KWG20023	rix Spike 313-2			
	Sample		Spike			Spike		% Rec		RPD
Analyte Name	Result	Result	Amount	% Rec	Result	Amount	% Rec	Limits	RPD	Limit
Tetrachloroethene (PC	E) 13	12.8 E	1.39	-26	12.1 E	1.39	-75	48-125	5	40

Results flagged with an asterisk (\ast) indicate values outside control criteria.

Results flagged with a pound (#) indicate the control criteria is not applicable.

Percent recoveries and relative percent differences (RPD) are determined by the software using values in the calculation which have not been rounded.

Matrix Spike and Matrix Spike Duplicate Data is presented for information purposes only. The matrix may or may not be relevant to samples reported in this report. The laboratory evaluates system performance based on the LCS and LCSD control limits.

Analytical Report **Client:** Service Request: K2006350 Anchor QEA, LLC **Project:** Carson Cleaners Vapor Intrusion Evaluation/200544-01.01 Date Collected: NA Sample Matrix: Soil Date Received: NA Sample Name: Method Blank Units: mg/Kg Lab Code: KWG2002313-5 Basis: Dry

Volatile Organic Compounds

Analysis Method:	8260C
Prep Method:	EPA 5035A/5030B

Analyte Name	Result	MRL	Dil. D	ate Analyzed	Date Extr	acted	Q
Tetrachloroethene (PCE)	ND U	0.050	1 0	8/06/20 16:49	8/6/20	0	
Surrogate Name		% Rec	Control Lim	its Date Aı	nalyzed	Q	
Dibromofluoromethane		97	55 - 132	08/06/2	0 16:49		
Toluene-d8		104	81 - 124	08/06/2	0 16:49		
4-Bromofluorobenzene		88	64 - 132	08/06/2	0 16:49		

Analytical Report **Client:** Service Request: K2006350 Anchor QEA, LLC **Project:** Carson Cleaners Vapor Intrusion Evaluation/200544-01.01 Date Collected: NA Sample Matrix: Soil Date Received: NA Sample Name: Method Blank Units: mg/Kg Lab Code: KWG2002331-3 Basis: Dry

Volatile Organic Compounds

Analysis Method:	8260C
Prep Method:	EPA 5035A/5030B

Analyte Name	Result	MRL	Dil. D	ate Analyzed	Date Extracted	Q
Tetrachloroethene (PCE)	ND U	0.050	1 08	8/07/20 13:10	8/7/20	
Surrogate Name		% Rec	Control Limi	ts Date Aı	nalyzed Q	
Dibromofluoromethane		96	55 - 132	08/07/2	0 13:10	
Toluene-d8		103	81 - 124	08/07/2	0 13:10	
4-Bromofluorobenzene		87	64 - 132	08/07/2	0 13:10	

QA/QC Report

Client:	Anchor QEA, LI	.C			S	Service Ree	quest:	K2006350)
Project:	Carson Cleaners	Vapor Intrusion E	valuation	/200544-01	.01 I	Date Analy	zed:	08/06/20	
Sample Matrix:	Soil				I	Date Extra	cted:	08/06/20	
		Duplicat	e Lab Co	ntrol Samp	ole Summary				
		Vo	latile Org	ganic Comj	pounds				
Analysis Method:	8260C				τ	U nits:		mg/Kg	
Prep Method:	EPA 5035A/503	0 B			I	Basis:		Dry	
					I	Analysis Lo	ot:	KWG2002	2310
	La	b Control Samp	e	D	uplicate Lab Co	ntrol Samj	ple		
]	KWG2002313-3			KWG2002	313-4			
							% Rec		
Analyte Name	Result	Spike Amount	% Rec	Result	Spike Amount	% Rec	Limits	RPD	RPD Limit
Tetrachloroethene (PCE	E) 0.833	1.00	83	0.863	1.00	86	65-126	4	40

QA/QC Report

Client: Project:	Anchor QEA, LI Carson Cleaners	LC Vapor Intrusion E	Evaluation	200544-01	.01	Service Red Date Analy	quest: /zed:	K2006350 08/07/20)
Sample Matrix:	Soil	1]	Date Extra	cted:	08/07/20	
		Duplicat Vo	te Lab Co platile Org	ntrol Samp ganic Comj	ble Summary pounds				
Analysis Method:	8260C				I	Units:		mg/Kg	
Prep Method:	EPA 5035A/5030B]	Basis: Analysis Lo	ot:	Dry KWG200	2330
	La	ab Control Samp KWG2002331-1	Duplicate Lab Control Sample KWG2002331-2						
Analyte Name	Result	Spike Amount	% Rec	Result	Spike Amount	% Rec	% Rec Limits	RPD	RPD Limit
Tetrachloroethene (PCE	0.862	1.00	86	0.904	1.00	90	65-126	5	40

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QA/QC Report

Client:Anchor QEA, LLCProject:Carson Cleaners Vapor Intrusion Evaluation/200544-01.01Sample Matrix:Soil

Service Request: K2006350

SURROGATE RECOVERY SUMMARY

Volatile Organic Compounds by GC/MS

Analysis Method:	8260C
Extraction Method:	None

		4-Bromofluorobenzene	Dibromofluoromethane	Toluene-d8
Sample Name	Lab Code	88-127	82-146	90-142
CC-MW-01-14.5-072420	K2006350-001	100	99	101
CC-MW-01-18-072420	K2006350-002	98	103	102
CC-MW-01-24-072420	K2006350-003	99	101	101
CC-MW-01-124-072420	K2006350-004	101	97	100
CC-MW-01-29-072420	K2006350-005	99	101	102
Method Blank	KQ2010368-05	99	97	101
Lab Control Sample	KQ2010368-03	104	106	101
Duplicate Lab Control Sample	KQ2010368-04	103	107	105

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QA/QC Report

Client:Anchor QEA, LLCProject:Carson Cleaners Vapor Intrusion Evaluation/200544-01.01Sample Matrix:Water

Service Request: K2006350

SURROGATE RECOVERY SUMMARY

Volatile Organic Compounds by GC/MS

Analysis Method:8260CExtraction Method:None

		4-Bromofluorobenzene	Dibromofluoromethane	Toluene-d8
Sample Name	Lab Code	88-127	82-146	90-142
TB-01-072420	K2006350-006	87	97	103
Method Blank	KQ2010749-07	87	95	100
Lab Control Sample	KQ2010749-05	90	97	103
Duplicate Lab Control Sample	KQ2010749-06	92	99	100

Analytical Report **Client:** Service Request: K2006350 Anchor QEA, LLC **Project:** Carson Cleaners Vapor Intrusion Evaluation/200544-01.01 Date Collected: NA Sample Matrix: Soil Date Received: NA Sample Name: Method Blank Units: ug/Kg Lab Code: KQ2010368-05 Basis: Dry

Volatile Organic Compounds by GC/MS

Analysis Method:	8260C
Prep Method:	None

Analyte Name	Result	MRL	Dil.	Date Analyzed	Q
Trichloroethene (TCE)	ND U	5.0	1	07/30/20 10:31	
Vinyl Chloride	ND U	5.0	1	07/30/20 10:31	
cis-1,2-Dichloroethene	ND U	5.0	1	07/30/20 10:31	
trans-1,2-Dichloroethene	ND U	5.0	1	07/30/20 10:31	

Surrogate Name	% Rec	Control Limits	Date Analyzed	Q
4-Bromofluorobenzene	99	88 - 127	07/30/20 10:31	
Dibromofluoromethane	97	82 - 146	07/30/20 10:31	
Toluene-d8	101	90 - 142	07/30/20 10:31	

Analytical Report **Client:** Service Request: K2006350 Anchor QEA, LLC **Project:** Carson Cleaners Vapor Intrusion Evaluation/200544-01.01 Date Collected: NA Sample Matrix: Water Date Received: NA Sample Name: Method Blank Units: ug/L Lab Code: KQ2010749-07 Basis: NA

Volatile Organic Compounds by GC/MS

Analysis Method:	8260C
Prep Method:	None

Analyte Name	Result	MRL	Dil.	Date Analyzed	Q
Tetrachloroethene (PCE)	ND U	0.50	1	08/05/20 12:19	
Trichloroethene (TCE)	ND U	0.50	1	08/05/20 12:19	
Vinyl Chloride	ND U	0.50	1	08/05/20 12:19	
cis-1,2-Dichloroethene	ND U	0.50	1	08/05/20 12:19	
trans-1,2-Dichloroethene	ND U	0.50	1	08/05/20 12:19	

Surrogate Name	% Rec	Control Limits	Date Analyzed	Q
4-Bromofluorobenzene	87	68 - 117	08/05/20 12:19	
Dibromofluoromethane	95	73 - 122	08/05/20 12:19	
Toluene-d8	100	65 - 144	08/05/20 12:19	

QA/QC Report

Client:	Anchor	QEA, LL	.C				Service Ree	quest:	K2006350)	
Project:	Carson	Cleaners	Vapor Intrusion E	valuation/	200544-01	.01	Date Analy	zed:	07/30/20		
Sample Matrix:	Soil						Date Extra	cted:	NA		
			Duplicat	e Lab Cor	ntrol Samp	ole Summary					
			Volatile	Organic (Compound	s by GC/MS					
Analysis Method:	8260C						Units:		ug/Kg		
Prep Method:	None						Basis:		Dry		
-							Analysis Lo	ot:	689000		
		La	b Control Sampl	e	D	uplicate Lab Co	ate Lab Control Sample				
			KQ2010368-03			KQ20103	68-04				
Analyta Nama		Docult	Spika Amount	% D oo	Docult	Spika Amoun	t 0/ Doo	% Rec	DDD	DDD I imit	
cis-1 2-Dichloroethene		<u>18 2</u>	50.0	96	13.5	50.0	87	62-138	10	40	
trans-1 2-Dichloroether	ne		50.0	102	48.5	50.0	97	63-127	5	40	
Trichloroethene (TCE)		48.0	50.0	96	45.3	50.0	91	67-126	6	40	
Vinyl Chloride		51.0	50.0	102	48.9	50.0	98	54-127	4	40	

QA/QC Report

Client:	Anchor	Anchor QEA, LLC					Service Red	quest:	K2006350)
Project:	Carson	Cleaners	Vapor Intrusion E	valuation/	200544-01	.01	Date Analy	zed:	08/05/20	
Sample Matrix:	Water]	Date Extra	cted:	NA	
			Duplicat	e Lab Co	ntrol Samp	le Summary				
			Volatile	Organic (Compound	s by GC/MS				
Analysis Method:	8260C					1	Units:		ug/L	
Prep Method:	None]	Basis:		NA	
							Analysis Lo	ot:	689764	
		La	b Control Sampl	e	D	uplicate Lab Co	ontrol Sam	ple		
			KQ2010749-05			KQ20107	49-06	-		
								% Rec		
Analyte Name		Result	Spike Amount	% Rec	Result	Spike Amount	% Rec	Limits	RPD	RPD Limit
cis-1,2-Dichloroethene	e	9.69	10.0	97	9.83	10.0	98	71-118	1	30
Tetrachloroethene (PC	E)	9.14	10.0	91	8.75	10.0	88	62-126	4	30
trans-1,2-Dichloroethe	ene	9.78	10.0	98	9.72	10.0	97	67-125	<1	30
Trichloroethene (TCE))	10.2	10.0	102	9.50	10.0	95	67-128	7	30
Vinyl Chloride		9.69	10.0	97	9.41	10.0	94	55-123	3	30

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QA/QC Report

Client:Anchor QEA, LLCProject:Carson Cleaners Vapor Intrusion Evaluation/200544-01.01Sample Matrix:Soil

Service Request: K2006350

SURROGATE RECOVERY SUMMARY

Volatile Petroleum Products Method for Soil and Water for the Northwest

Analysis Method:	NWTPH-Gx
Extraction Method:	None

		4-Bromofluorobenzene	
Sample Name	Lab Code	50-150	
CC-MW-01-14.5-072420	K2006350-001	98	
CC-MW-01-18-072420	K2006350-002	93	
CC-MW-01-24-072420	K2006350-003	93	
CC-MW-01-124-072420	K2006350-004	96	
CC-MW-01-29-072420	K2006350-005	97	
CC-MW-01-14.5-072420	KQ2010348-07	87	
Method Blank	KQ2010348-05	74	
Lab Control Sample	KQ2010348-06	91	

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QA/QC Report

Client:Anchor QEA, LLCProject:Carson Cleaners Vapor Intrusion Evaluation/200544-01.01Sample Matrix:Water

Service Request: K2006350

SURROGATE RECOVERY SUMMARY

Volatile Petroleum Products Method for Soil and Water for the Northwest

Analysis Method:	NWTPH-Gx
Extraction Method:	None

		4-Bromofluorobenzene
Sample Name	Lab Code	50-150
TB-01-072420	K2006350-006	92
Method Blank	KQ2010293-05	92
Lab Control Sample	KQ2010293-06	98

QA/QC Repo

Client:	Anchor QEA, LLC		S	ervice Request:	K2006350
Project	Carson Cleaners Vapor Intrusion Evaluation/	200544-01.01		Date Collected:	07/24/20
Sample Matrix:	Soil			Date Received:	07/28/20
				Date Analyzed:	07/29/20
	Replicate Sa	ample Summa	ry		
	Volatile Petroleum Products Metho	od for Soil and	Water for the No	rthwest	
Sample Name:	CC-MW-01-14.5-072420			Units:	mg/Kg
Lab Code:	K2006350-001			Basis:	Dry
			Duplicate Sample		
		Sample	KO2010348-07		

			Sample	KQ2010340-07			
Analyte Name	Analysis Method	MRL	Result	Result	Average	RPD	RPD Limit
Gasoline Range Organics-NWTPH	NWTPH-Gx	6.4	ND U	ND U	NC	NC	40

Results flagged with an asterisk (*) indicate values outside control criteria.

Results flagged with a pound (#) indicate the control criteria is not applicable.

Percent recoveries and relative percent differences (RPD) are determined by the software using values in the calculation which have not been rounded.

	Analytical Report		
Client:	Anchor QEA, LLC	Service Request:	K2006350
Project:	Carson Cleaners Vapor Intrusion Evaluation/200544-01.01	Date Collected:	NA
Sample Matrix:	Water	Date Received:	NA
Sample Name:	Method Blank	Units:	ug/L
Lab Code:	KQ2010293-05	Basis:	NA
	Volatile Petroleum Products Method for Soil and Water for	the Northwest	
Analysis Method:	NWTPH-Gx		
Prep Method:	None		

Analyte Name	Result	MRL	Dil.	Date Anal	lyzed	Q
Gasoline Range Organics-NWTPH	ND U	250	1	07/29/20 1	13:07	
Surrogate Name	% Rec	Control Limits	Da	ate Analyzed	Q	
1,4-Difluorobenzene	92	50 - 150	07	7/29/20 13:07		

		Analytical R	Report			
Client:	Anchor QEA, LLC			Service	Request: K2006350	
Project:	Carson Cleaners Vapor	Intrusion Evaluation/200544	4-01.01	Date	Collected: NA	
Sample Matrix:	Soil			Date	Received: NA	
Sample Name:	Method Blank				Units: mg/Kg	
Lab Code:	KQ2010348-05				Basis: Dry	
	Volatile Petro	leum Products Method for	Soil and Water for	r the Northw	est	
Analysis Method:	NWTPH-Gx					
Prep Method:	None					
Analyte Name		Result	MRL	Dil.	Date Analyzed	Q
Gasoline Range Orga	anics-NWTPH	ND U	5.0	50	07/29/20 17:57	

Surrogate Name	% Rec	Control Limits	Date Analyzed	Q
4-Bromofluorobenzene	74	50 - 150	07/29/20 17:57	

QA/QC Report

Client:	Anchor QEA, LLC	Service Request:	K2006350
Project:	Carson Cleaners Vapor Intrusion Evaluation/200544-01.01	Date Analyzed:	07/29/20
Sample Matrix:	Water	Date Extracted:	NA
	Lab Control Sample Summary		
	Volatile Petroleum Products Method for Soil and Wat	er for the Northwest	
Analysis Method:	NWTPH-Gx	Units:	ug/L
Prep Method:	None	Basis:	NA
		Analysis Lot:	688859
	Lab Control S	Sample	
	KQ2010293	3-06	

Analyte Name	Result	Spike Amount	% Rec	% Rec Limits
Gasoline Range Organics-NWTPH	470	500	94	80-119

QA/QC Report

Client:	Anchor QEA, LLC	Service Request:	K2006350
Project:	Carson Cleaners Vapor Intrusion Evaluation/200544-01.01	Date Analyzed:	07/29/20
Sample Matrix:	Soil	Date Extracted: N	
	Lab Control Sample Summary		
	Volatile Petroleum Products Method for Soil and Wat	er for the Northwest	
Analysis Method:	NWTPH-Gx	Units:	mg/Kg
Prep Method:	None	Basis:	Dry
		Analysis Lot:	688966
	Lab Control S	Sample	

KQ2010348-06

Analyte Name	Result	Spike Amount	% Rec	% Rec Limits
Gasoline Range Organics-NWTPH	22.5	25.0	90	76-114



Semivolatile Organic Compounds by GC

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QA/QC Report

Client:	Anchor QEA, LLC
Project:	Carson Cleaners Vapor Intrusion Evaluation/200544-01.01
Sample Matrix:	Soil

Service Request: K2006350

SURROGATE RECOVERY SUMMARY

Diesel and Residual Range Organics

Analysis Method:	NWTPH-Dx
Extraction Method:	EPA 3550B

		n-Triacontane	o-Terphenyl	
Sample Name	Lab Code	50 - 150	50 - 150	
CC-MW-01-14.5-072420	K2006350-001	88	86	
CC-MW-01-18-072420	K2006350-002	96	96	
CC-MW-01-24-072420	K2006350-003	95	95	
CC-MW-01-124-072420	K2006350-004	98	98	
CC-MW-01-29-072420	K2006350-005	95	94	
CC-MW-01-18-072420 DUP	KWG2002194-1	85	84	
Lab Control Sample	KWG2002194-2	103	105	
Method Blank	KWG2002194-3	103	102	

QA/QC Report

Client:	Anchor QEA	, LLC				Service Request:	K20063	50
Project	Carson Clean	ners Vapor Intrusion E	valuation/	200544-01.01		Date Collected:	07/24/20)
Sample Matrix:	Soil					Date Received:	07/28/2)
						Date Analyzed:	08/05/20)
		Re	eplicate Sa	mple Summ	ary			
		Diesel	and Resid	lual Range O	rganics			
Sample Name:	CC-MW-01	-18-072420				Units:	mg/Kg	
Lab Code:	K2006350-0	002				Basis:	Dry	
					Duplicate Sample KWG2002194-			
				Sample	1			
Analyte Name		Analysis Method	MRL	Result	Result	Average	RPD	RPD Limit
Diesel Range Organics (I	DRO)	NWTPH-Dx	30	ND U	ND U	ND		40
Residual Range Organics	(RRO)	NWTPH-Dx	120	ND U	ND U	ND		40

Results flagged with an asterisk (*) indicate values outside control criteria.

Results flagged with a pound (#) indicate the control criteria is not applicable.

Percent recoveries and relative percent differences (RPD) are determined by the software using values in the calculation which have not been rounded.

Analytical Report **Client:** Service Request: K2006350 Anchor QEA, LLC **Project:** Carson Cleaners Vapor Intrusion Evaluation/200544-01.01 Date Collected: NA Sample Matrix: Soil Date Received: NA Sample Name: Method Blank Units: mg/Kg Lab Code: KWG2002194-3 Basis: Dry

Diesel and Residual Range Organics

Analysis Method:	NWTPH-Dx
Prep Method:	EPA 3550B

Analyte Name	Result	MRL	Dil.	Date Analyzed	Date Extracted	Q
Diesel Range Organics (DRO)	ND U	25	1	08/05/20 20:07	7/30/20	
Residual Range Organics (RRO)	ND U	99	1	08/03/20 20:07	7/30/20	

Surrogate Name	% Rec	Control Limits	Date Analyzed	Q
o-Terphenyl	102	50 - 150	08/05/20 20:07	
n-Triacontane	103	50 - 150	08/05/20 20:07	

QA/QC Report

Client: Project: Somulo Matrix:	Anchor QEA, LLC Carson Cleaners Vapo	or Intrusion Evaluation/20	00544-01.01	Service Request: Date Analyzed:	K2006350 08/05/20 07/30/20
Sample Matrix:	5011	Lab Control Sa Diesel and Residu	ample Summary al Range Organics	Date Extracted:	07/30/20
Analysis Method: Prep Method:	NWTPH-Dx EPA 3550B			Units: Basis: Analysis Lot:	mg/Kg Dry KWG2002294
			Lab Control Sample KWG2002194-2		
Analyte Name		Result	Spike Amount	% Rec	% Rec Limits
Diesel Range Organic Residual Range Organ	s (DRO) nics (RRO)	283 142	267 133	106 107	42-134 48-141



General Chemistry

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			QA/QC Report				
Client:	Anchor QEA, LLC				Service Req	uest: K200	6350
Project	Carson Cleaners Vapor Intr	rusion Eval	uation/200544-0	01.01	Date Colle	ected: 07/24	/20
Sample Matrix:	Soil				Date Rece	eived: 07/28	/20
					Date Anal	yzed: 07/29	/20
		Repli	cate Sample Su	mmary			
		In	organic Param	eters			
Sample Name:	CC-MW-01-14.5-072420				1	Units: Perce	ent
Lab Code:	K2006350-001					Basis: As R	eceived
			Sample	Duplicate Sample K2006350- 001DUP			
Analyte Name	Analysis Method	MRL	Result	Result	Average	RPD	RPD Limit
Solids, Total	160.3 Modified	-	92.4	92.3	92.4	<1	20

Results flagged with an asterisk (*) indicate values outside control criteria.

Results flagged with a pound (#) indicate the control criteria is not applicable.

Percent recoveries and relative percent differences (RPD) are determined by the software using values in the calculation which have not been rounded.

Service Request No:K2007073



Nathan Soccorsy Anchor QEA, LLC 720 Olive Way, Suite 1900 Seattle, WA 98101

Laboratory Results for: Carson Cleaners Facility

Dear Nathan,

Enclosed are the results of the sample(s) submitted to our laboratory August 18, 2020 For your reference, these analyses have been assigned our service request number **K2007073**.

Analyses were performed according to our laboratory's NELAP-approved quality assurance program. The test results meet requirements of the current NELAP standards, where applicable, and except as noted in the laboratory case narrative provided. For a specific list of NELAP-accredited analytes, refer to the certifications section at www.alsglobal.com. All results are intended to be considered in their entirety, and ALS Group USA Corp. dba ALS Environmental (ALS) is not responsible for use of less than the complete report. Results apply only to the items submitted to the laboratory for analysis and individual items (samples) analyzed, as listed in the report.

Please contact me if you have any questions. My extension is 3376. You may also contact me via email at Mark.Harris@alsglobal.com.

Respectfully submitted,

ALS Group USA, Corp. dba ALS Environmental

Kelley Loveyoy

for Mark Harris Project Manager

> ADDRESS 1317 S. 13th Avenue, Kelso, WA 98626 PHONE +1 360 577 7222 | FAX +1 360 636 1068 ALS Group USA, Corp. dba ALS Environmental



Narrative Documents

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Client: Anchor QEA, LLC Project: Carson Cleaners Facility Sample Matrix: Water Service Request: K2007073 Date Received: 08/18/2020

CASE NARRATIVE

All analyses were performed consistent with the quality assurance program of ALS Environmental. This report contains analytical results for samples for the Tier II level requested by the client.

Sample Receipt:

Three water samples were received for analysis at ALS Environmental on 08/18/2020. Any discrepancies upon initial sample inspection are annotated on the sample receipt and preservation form included within this report. The samples were stored at minimum in accordance with the analytical method requirements.

Volatiles by GC/MS:

Method 8260C, 08/31/2020: The analysis of samples CC-TB-20200814 and CC-MW-01-20200814 for compounds Tetrachloroethane and Trichloroethene was initially performed within the recommended holding time. Reanalysis at a dilution was required. The reanalysis was performed three days past the recommended holding time. The results from the second analysis were reported.

Approved by

Kelley Loveyo

Date 09/08/2020



SAMPLE DETECTION SUMMARY

CLIENT ID: CC-TB-20200814	Lab ID: K2007073-001					
Analyte	Results	Flag	MDL	MRL	Units	Method
Tetrachloroethene (PCE)	2100			50	ug/L	8260C
Trichloroethene (TCE)	110			50	ug/L	8260C
cis-1,2-Dichloroethene	40			0.50	ug/L	8260C
CLIENT ID: CC-MW-01-20200814	Lab ID: K2007073-002					
Analyte	Results	Flag	MDL	MRL	Units	Method
Gasoline Range Organics (Toluene- Naphthalene GRO)	1860			250	ug/L	NWTPH-Gx
Tetrachloroethene (PCE)	2100			50	ug/L	8260C
Trichloroethene (TCE)	100			50	ug/L	8260C
cis-1,2-Dichloroethene	1.3			0.50	ug/L	8260C


Sample Receipt Information

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Client:Anchor QEA, LLCProject:Carson Cleaners Facility/200544-01.01

SAMPLE CROSS-REFERENCE

<u>SAMPLE #</u>	CLIENT SAMPLE ID	DATE	TIME
K2007073-001	CC-TB-20200814	8/14/2020	1400
K2007073-002	CC-MW-01-20200814	8/14/2020	1500
K2007073-003	Trip Blank	8/14/2020	

			- cicking	131	7 South	n 13th /	Ne, K	ielso, 1	CI wa 98	1 AI 1 8626	N O 1 (Phone www.a	0F CUSTODY 0965 (360) 577-7222 / 800-699 alsglobal.com	001 5-7222 / FAX (36	50) 636-1068	SR# COC Setof COC#	2 Page 1 of 1
Project Name (AASAM CLEANOUS FACTURE Project Manager MATHAN SOCCA Company ANCLOW QEA Address 1201 364 AVE, 472 Phone # 2,26287 9130 Sampler Signature CBS	6 ORD sampler P	SEATTE BDATA FINTED NAME NUTCO	01.01 1 WA PANCITU STREE	98131	ABER OF CONTAINERS	C/VOCFP 14D										
CLIENT SAMPLE ID L 1. CC-TB-2020814	ABID	SAMF Date 8-14-20	2LING Time 1400	Matrix H 70	INN 2	< 🗙 B260		~	.e.	¥.	<u> </u>	Remarks				
3000/1000000000000000000000000000000000		BANNA BANNA	IBRAAN	res Mbu		<u>/</u>										
6. 7. 8.																
9. 10. Report Requirements	Invo	oice Info	rmation													
I. Routine Report: Method Blank, Surrogate, as required II. Report Dup., MS, MSD as required III. CLP Like Summary (no raw data) IV. Data Validation Report V. EDD	P.O.# Bill To: Turnarc ²⁴	20544- MACHEN The Some Day andard Requested Repo	Q ANS Q ANS quiremen 48 hr.	Hog s	pecial LA I	Di Instr 3E L	Total ssolve uctic S	Meta ed Me ons/C ৫.৩০	ils: A etals: Comr DRE E T	I A Al nen	s Si As ts: off	b Ba Be B Ca C Sb Ba Be B Ca [*Indi F, BCTTLES F	Circle which Cd Co Cr C Cd Co Cr icate State H	metals are to be analyzed Su Fe Pb Mg Mn Mo Ni K Cu Fe Pb Mg Mn Mo Ni H lydrocarbon Procedure: AK C /S2605 ANALYS	Ag Na Se Sr Ti Sn V K Ag Na Se Sr Ti Sn CA WI Northwest Other IS	Zn Hg V Zn Hg (Circle One)
Relinquished By:		eceived	hy:	/	Re	linqu	uish	ed I	Зу:			Received	By:	Relinquished By	/: Rece	ived By:
Printed Name	Printed Na	H CHA	ale	Print	ature ed Na	me					Pi	ignature		Printed Name	Signature Printed Name	
Firm ANCITUM QEM	Firma LLX Date/Time	(120	OPSÙ	Firm Date	/Time						Fi Di	rm ate/Time		Firm Date/Time	Firm Date/Time	

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					PM MH		
	opler Receipt and	Preservation	Form	·	\sim		
Client TMCN/V QC	A	Servic	e Request K20	$(\mathcal{T}\mathcal{O})$	13		
Received: 81820 Opened: 81820 By 12/2 Unloaded: 81810 By 12/2							
1. Samples were received via? USPS Fed Ex UPS DHL PDX Courier Hand Delivered							
2. Samples were received in: (circle) Cooler Box Envelope Other Other							
3. Were custody seals on coolers? NA Q N If yes, how many and where?							
If present, were custody seals intact?	(Y) N If prese	ent, were they sign	ed and dated?	R	- N		
4. Was a Temperature Blank present in cooler? NA	A Y N If yes,	notate the tempera	ture in the appropr	iate column below:			
If no, take the temperature of a representative sa	ample bottle contained with	hin the cooler; nota	te in the column "S	Sample Temp":			
5. Were samples received within the method specifi	ied temperature ranges?		,	NA Y	N		
If no, were they received on ice and same day as	s collected? If not, notate th	ne cooler # below a	nd notify the PM.	NA Y	N		
If applicable, tissue samples were received: Fro	zen Partially Thawed	Thawed					
	and a company of the						
			PM				
Temp Blank Sample Temp IR Gun C	ooler #/COC ID / NA	indicate with "X"	If out of temp	Tracking Numbe	or NA Filed		
5.0 - WOI	42-			3958 880	15831		
$\left[Q. \overline{O} \right] - \left[1 \right]$			-				
$ $ $ $ $ $ $ $ $ $							
6. Packing material: Inserts Baggies Bubbl	le Wrap Gel Packs (We	et Ice Dry Ice					
7. Were custody papers properly filled out (ink, si	igned, etc.)?			NA (Y)			
8. Were samples received in good condition (unbr	roken)			NA (Y)	N		
9. Were all sample labels complete (ie, analysis, p	reservation, etc.)?			NA (Y)	Ner		
10. Did all sample labels and tags agree with custody papers? NA							
11. Were appropriate bottles/containers and volumes received for the tests indicated? NA (Y) N							
12. Were VOA viele reserved bottles (see SMO GEN)	SOP) received at the appro	opriate pH? Indica	te in the table belo	W (NA) Y	N		
14. Was C12/Pes pagative?	inaicate in the table below	ν.		NA Y	(N)		
14. was C12/Res liegauve:				<u>(NA) Y</u>	<u>N</u>		
Sample ID on Bottle	Sample ID on	COC		Identified by:			
			<u></u>		<u></u>		

Sample ID	Bottle Count Bottle Type	Head-	Broke	pH	Reagent	Volume added	Reagent Lot Number	Initials	Time
Ino Mary	2012109	r		<u> </u>					1 11114
C-MW-01-2020084	lof VVQ	×							
0									
								++	



Miscellaneous Forms

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Inorganic Data Qualifiers

- * The result is an outlier. See case narrative.
- # The control limit criteria is not applicable. See case narrative.
- B The analyte was found in the associated method blank at a level that is significant relative to the sample result as defined by the DOD or NELAC standards.
- E The result is an estimate amount because the value exceeded the instrument calibration range.
- J The result is an estimated value.
- U The analyte was analyzed for, but was not detected ("Non-detect") at or above the MRL/MDL. DOD-QSM 4.2 definition : Analyte was not detected and is reported as less than the LOD or as defined by the project. The detection limit is adjusted for dilution.
- i The MRL/MDL or LOQ/LOD is elevated due to a matrix interference.
- X See case narrative.
- Q See case narrative. One or more quality control criteria was outside the limits.
- H The holding time for this test is immediately following sample collection. The samples were analyzed as soon as possible after receipt by the laboratory.

Metals Data Qualifiers

- # The control limit criteria is not applicable. See case narrative.
- J The result is an estimated value.
- E The percent difference for the serial dilution was greater than 10%, indicating a possible matrix interference in the sample.
- M The duplicate injection precision was not met.
- N The Matrix Spike sample recovery is not within control limits. See case narrative.
- S The reported value was determined by the Method of Standard Additions (MSA).
- U The analyte was analyzed for, but was not detected ("Non-detect") at or above the MRL/MDL.
- DOD-QSM 4.2 definition : Analyte was not detected and is reported as less than the LOD or as defined by the project. The detection limit is adjusted for dilution.
- W The post-digestion spike for furnace AA analysis is out of control limits, while sample absorbance is less than 50% of spike absorbance.
- $i \,$ $\,$ The MRL/MDL or LOQ/LOD is elevated due to a matrix interference.
- X See case narrative.
- + The correlation coefficient for the MSA is less than 0.995.
- Q See case narrative. One or more quality control criteria was outside the limits.

Organic Data Qualifiers

- * The result is an outlier. See case narrative.
- # The control limit criteria is not applicable. See case narrative.
- A A tentatively identified compound, a suspected aldol-condensation product.
- B The analyte was found in the associated method blank at a level that is significant relative to the sample result as defined by the DOD or NELAC standards.
- C The analyte was qualitatively confirmed using GC/MS techniques, pattern recognition, or by comparing to historical data.
- D The reported result is from a dilution.
- E The result is an estimated value.
- J The result is an estimated value.
- N The result is presumptive. The analyte was tentatively identified, but a confirmation analysis was not performed.
- P The GC or HPLC confirmation criteria was exceeded. The relative percent difference is greater than 40% between the two analytical results.
- U The analyte was analyzed for, but was not detected ("Non-detect") at or above the MRL/MDL.
 DOD-QSM 4.2 definition : Analyte was not detected and is reported as less than the LOD or as defined by the project. The detection limit is adjusted for dilution.
- i The MRL/MDL or LOQ/LOD is elevated due to a chromatographic interference.
- X See case narrative.
- Q See case narrative. One or more quality control criteria was outside the limits.

Additional Petroleum Hydrocarbon Specific Qualifiers

- ${f F}$ The chromatographic fingerprint of the sample matches the elution pattern of the calibration standard.
- L The chromatographic fingerprint of the sample resembles a petroleum product, but the elution pattern indicates the presence of a greater amount of lighter molecular weight constituents than the calibration standard.
- H The chromatographic fingerprint of the sample resembles a petroleum product, but the elution pattern indicates the presence of a greater amount of heavier molecular weight constituents than the calibration standard.
- O The chromatographic fingerprint of the sample resembles an oil, but does not match the calibration standard.
- Y The chromatographic fingerprint of the sample resembles a petroleum product eluting in approximately the correct carbon range, but the elution pattern does not match the calibration standard.
- Z The chromatographic fingerprint does not resemble a petroleum product.

ALS Group USA Corp. dba ALS Environmental (ALS) - Kelso State Certifications, Accreditations, and Licenses

Agency	Web Site	Number
Alaska DEH	http://dec.alaska.gov/eh/lab/cs/csapproval.htm	UST-040
Arizona DHS	http://www.azdhs.gov/lab/license/env.htm	AZ0339
Arkansas - DEQ	http://www.adeq.state.ar.us/techsvs/labcert.htm	88-0637
California DHS (ELAP)	http://www.cdph.ca.gov/certlic/labs/Pages/ELAP.aspx	2795
DOD ELAP	http://www.denix.osd.mil/edqw/Accreditation/AccreditedLabs.cfm	L16-58-R4
Florida DOH	http://www.doh.state.fl.us/lab/EnvLabCert/WaterCert.htm	E87412
Hawaii DOH	http://health.hawaii.gov/	-
ISO 17025	http://www.pjlabs.com/	L16-57
Louisiana DEQ	http://www.deq.louisiana.gov/page/la-lab-accreditation	03016
Maine DHS	http://www.maine.gov/dhhs/	WA01276
Minnesota DOH	http://www.health.state.mn.us/accreditation	053-999-457
Nevada DEP	http://ndep.nv.gov/bsdw/labservice.htm	WA01276
New Jersey DEP	http://www.nj.gov/dep/enforcement/oqa.html	WA005
New York - DOH	https://www.wadsworth.org/regulatory/elap	12060
North Carolina DEQ	https://deq.nc.gov/about/divisions/water-resources/water-resources- data/water-sciences-home-page/laboratory-certification-branch/non-field-lab- certification	605
Oklahoma DEQ	http://www.deq.state.ok.us/CSDnew/labcert.htm	9801
Oregon – DEQ (NELAP)	http://public.health.oregon.gov/LaboratoryServices/EnvironmentalLaborator yAccreditation/Pages/index.aspx	WA100010
South Carolina DHEC	http://www.scdhec.gov/environment/EnvironmentalLabCertification/	61002
Texas CEQ	http://www.tceq.texas.gov/field/qa/env_lab_accreditation.html	T104704427
Washington DOE	http://www.ecy.wa.gov/programs/eap/labs/lab-accreditation.html	C544
Wyoming (EPA Region 8)	https://www.epa.gov/region8-waterops/epa-region-8-certified-drinking-water-	-
Kelso Laboratory Website	www.alsglobal.com	NA

Analyses were performed according to our laboratory's NELAP-approved quality assurance program. A complete listing of specific NELAP-certified analytes, can be found in the certification section at www.ALSGlobal.com or at the accreditation bodies web site.

Please refer to the certification and/or accreditation body's web site if samples are submitted for compliance purposes. The states highlighted above, require the analysis be listed on the state certification if used for compliance purposes and if the method/anlayte is offered by that state.

Acronyms

ASTM	American Society for Testing and Materials
A2LA	American Association for Laboratory Accreditation
CARB	California Air Resources Board
CAS Number	Chemical Abstract Service registry Number
CFC	Chlorofluorocarbon
CFU	Colony-Forming Unit
DEC	Department of Environmental Conservation
DEQ	Department of Environmental Quality
DHS	Department of Health Services
DOE	Department of Ecology
DOH	Department of Health
EPA	U. S. Environmental Protection Agency
ELAP	Environmental Laboratory Accreditation Program
GC	Gas Chromatography
GC/MS	Gas Chromatography/Mass Spectrometry
LOD	Limit of Detection
LOQ	Limit of Quantitation
LUFT	Leaking Underground Fuel Tank
M MCL	Modified Maximum Contaminant Level is the highest permissible concentration of a substance allowed in drinking water as established by the USEPA.
MDL	Method Detection Limit
MPN	Most Probable Number
MRL	Method Reporting Limit
NA	Not Applicable
NC	Not Calculated
NCASI	National Council of the Paper Industry for Air and Stream Improvement
ND	Not Detected
NIOSH	National Institute for Occupational Safety and Health
PQL	Practical Quantitation Limit
RCRA	Resource Conservation and Recovery Act
SIM	Selected Ion Monitoring
TPH tr	Total Petroleum Hydrocarbons Trace level is the concentration of an analyte that is less than the PQL but greater than or equal to the MDL.

Analyst Summary report

Client:	Anchor QEA, LLC
Project:	Carson Cleaners Facility/200544-01.01

Service Request: K2007073

Sample Name:	CC-TB-20200814	Date Collected:	08/14/20
Lab Code:	K2007073-001	Date Received:	08/18/20
Sample Matrix:	Water		

Analysis Method 8260C		Extracted/Digested By	Analyzed By HJACKY
Sample Name: Lab Code: Sample Matrix:	CC-TB-20200814 K2007073-001.R01 Water		Date Collected: 08/14/20 Date Received: 08/18/20
Analysis Method 8260C		Extracted/Digested By	Analyzed By HJACKY
Sample Name: Lab Code: Sample Matrix:	CC-TB-20200814 K2007073-001.R02 Water		Date Collected: 08/14/20 Date Received: 08/18/20
Analysis Method 8260C		Extracted/Digested By	Analyzed By HJACKY
Sample Name: Lab Code: Sample Matrix:	CC-MW-01-20200814 K2007073-002 Water		Date Collected: 08/14/20 Date Received: 08/18/20
Analysis Method 8260C NWTPH-Gx		Extracted/Digested By	Analyzed By HJACKY KWINSTON

Analyst Summary report

Client:Anchor QEA, LLCProject:Carson Cleaners Facility/200544-01.01

Service Request: K2007073

 Sample Name:
 CC-MW-01-20200814
 Date Collected: 08/14/20

 Lab Code:
 K2007073-002.R01
 Date Received: 08/18/20

 Sample Matrix:
 Water

Analysis Method 8260C NWTPH-Gx Sample Name: Lab Code:	CC-MW-01-20200814 K2007073-002.R02	Extracted/Digested By	Analyzed By HJACKY KWINSTON Date Collected: 08/14/20 Date Received: 08/18/20
Sample Matrix:	Water		
Analysis Method 8260C		Extracted/Digested By	Analyzed By HJACKY
Sample Name:	Trip Blank		Date Collected: 08/14/20
Lab Code: Sample Matrix:	K2007073-003 Water		Date Received: 08/18/20
Analysis Method NWTPH-Gx		Extracted/Digested By	Analyzed By KWINSTON
Sample Name:	Trip Blank		Date Collected: 08/14/20
Lab Code: Sample Matrix:	K2007073-003.R01 Water		Date Received: 08/18/20
Analysis Method		Extracted/Digested By	Analyzed By
NWTPH-Gx			KWINSTON



Sample Results

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Volatile Organic Compounds by GC/MS

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Analytical Report

20 14:00
20 09:50
2

Analysis Method:	8260C
Prep Method:	None

Analyte Name	Result	MRL	Dil.	Date Analyzed	Q
Tetrachloroethene (PCE)	2100	50	100	08/31/20 15:01	*
Trichloroethene (TCE)	110	50	100	08/31/20 15:01	*
Vinyl Chloride	ND U	0.50	1	08/26/20 19:21	
cis-1,2-Dichloroethene	40	0.50	1	08/26/20 19:21	
trans-1,2-Dichloroethene	ND U	0.50	1	08/26/20 19:21	

Surrogate Name	% Rec	Control Limits	Date Analyzed	Q
4-Bromofluorobenzene	100	68 - 117	08/26/20 19:21	
Dibromofluoromethane	102	73 - 122	08/26/20 19:21	
Toluene-d8	111	65 - 144	08/26/20 19:21	

Analytical Report

Client:	Anchor QEA, LLC	Service Request: K2007073
Project:	Carson Cleaners Facility/200544-01.01	Date Collected: 08/14/20 15:00
Sample Matrix:	Water	Date Received: 08/18/20 09:50
Sample Name:	CC-MW-01-20200814	Units: ug/L
Lab Code:	K2007073-002	Basis: NA

Analysis Method:	8260C
Prep Method:	None

Analyte Name	Result	MRL	Dil.	Date Analyzed	Q
Tetrachloroethene (PCE)	2100	50	100	08/31/20 15:21	*
Trichloroethene (TCE)	100	50	100	08/31/20 15:21	*
Vinyl Chloride	ND U	0.50	1	08/26/20 20:21	
cis-1,2-Dichloroethene	1.3	0.50	1	08/26/20 20:21	
trans-1,2-Dichloroethene	ND U	0.50	1	08/26/20 20:21	

Surrogate Name	% Rec	Control Limits	Date Analyzed	Q
4-Bromofluorobenzene	99	68 - 117	08/26/20 20:21	
Dibromofluoromethane	104	73 - 122	08/26/20 20:21	
Toluene-d8	106	65 - 144	08/26/20 20:21	

		Anal	ytical Report					
Client:	Anchor QEA, LLC				Service	Request:	K2007073	
Project:	Carson Cleaners Facility	/200544-01.01			Date (Collected:	08/14/20 15:	00
Sample Matrix:	Water				Date I	Received:	08/18/20 09:	50
Sample Name:	CC-MW-01-20200814					Units:	ug/L	
Lab Code:	K2007073-002					Basis:	NA	
		Volatile Petroleu	m Product	s by GC/FID				
Analysis Method:	NWTPH-Gx							
Prep Method:	None							
Analyte Name		Result		MRL	Dil.	Date .	Analyzed	Q
Gasoline Range Orga Naphthalene GRO)	anics (Toluene-	1860		250	1	08/25	/20 13:55	
Surrogate Name			% Rec	Control Limits	Date	e Analyzed	Q	
1,4-Dilluorobenzene			105	50 - 150	00/2	25/20 15.55	,	

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1,4-Difluorobenzene

		Analytical Repo	ort			
Client:	Anchor QEA, LLC			Service Reque	st: K2007073	
Project:	Carson Cleaners Facility	/200544-01.01		Date Collecte	d: 08/14/20	
Sample Matrix:	Water			Date Receive	d: 08/18/20 09:	50
Sample Name:	Trip Blank			Uni	ts: ug/L	
Lab Code:	K2007073-003			Bas	is: NA	
		Volatile Petroleum Produ	cts by GC/FID			
Analysis Method:	NWTPH-Gx					
Prep Method:	None					
Analyte Name		Result	MRL	Dil. Da	ate Analyzed	Q
Gasoline Range Orga Naphthalene GRO)	anics (Toluene-	ND U	250	1 08	/25/20 14:42	
Surrogate Name		% Rec	Control Limits	Date Analy	zed Q	
1,4-Diffuorobenzene		101	50 - 150	06/23/20 12	t.42	

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QC Summary Forms

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Volatile Organic Compounds by GC/MS

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QA/QC Report

Client:Anchor QEA, LLCProject:Carson Cleaners Facility/200544-01.01Sample Matrix:Water

Service Request: K2007073

SURROGATE RECOVERY SUMMARY

Analysis Method:	8260C
Extraction Method:	None

		4-Bromofluorobenzene	Dibromofluoromethane	Toluene-d8
Sample Name	Lab Code	68-117	73-122	65-144
CC-TB-20200814	K2007073-001	100	102	111
CC-MW-01-20200814	K2007073-002	99	104	106
Method Blank	KQ2012140-08	98	100	106
Method Blank	KQ2012395-01	96	102	114
Lab Control Sample	KQ2012140-10	103	105	109
Duplicate Lab Control Sample	KQ2012140-11	101	105	106
Lab Control Sample	KQ2012395-05	103	102	107
Duplicate Lab Control Sample	KQ2012395-06	101	102	108

Analytical Report **Client:** Service Request: K2007073 Anchor QEA, LLC **Project:** Carson Cleaners Facility/200544-01.01 Date Collected: NA Sample Matrix: Water Date Received: NA Sample Name: Method Blank Units: ug/L Lab Code: KQ2012140-08 Basis: NA

Analysis Method:	8260C
Prep Method:	None

Analyte Name	Result	MRL	Dil.	Date Analyzed	Q
Tetrachloroethene (PCE)	ND U	0.50	1	08/26/20 15:21	
Trichloroethene (TCE)	ND U	0.50	1	08/26/20 15:21	
Vinyl Chloride	ND U	0.50	1	08/26/20 15:21	
cis-1,2-Dichloroethene	ND U	0.50	1	08/26/20 15:21	
trans-1,2-Dichloroethene	ND U	0.50	1	08/26/20 15:21	

Surrogate Name	% Rec	Control Limits	Date Analyzed	Q
4-Bromofluorobenzene	98	68 - 117	08/26/20 15:21	
Dibromofluoromethane	100	73 - 122	08/26/20 15:21	
Toluene-d8	106	65 - 144	08/26/20 15:21	

Analytical Report **Client:** Service Request: K2007073 Anchor QEA, LLC **Project:** Carson Cleaners Facility/200544-01.01 Date Collected: NA Sample Matrix: Water Date Received: NA Sample Name: Method Blank Units: ug/L Lab Code: KQ2012395-01 Basis: NA

Analysis Method:	8260C
Prep Method:	None

Analyte Name	Result	MRL	Dil.	Date Analyzed	Q
Tetrachloroethene (PCE)	ND U	0.50	1	08/31/20 12:41	
Trichloroethene (TCE)	ND U	0.50	1	08/31/20 12:41	
Vinyl Chloride	ND U	0.50	1	08/31/20 12:41	
cis-1,2-Dichloroethene	ND U	0.50	1	08/31/20 12:41	
trans-1,2-Dichloroethene	ND U	0.50	1	08/31/20 12:41	

Surrogate Name	% Rec	Control Limits	Date Analyzed	Q
4-Bromofluorobenzene	96	68 - 117	08/31/20 12:41	
Dibromofluoromethane	102	73 - 122	08/31/20 12:41	
Toluene-d8	114	65 - 144	08/31/20 12:41	

QA/QC Report

Client:	Anchor	nchor QEA, LLC					Service Red	quest:	K2007073	3
Project:	Carson	arson Cleaners Facility/200544-01.01					Date Analy	zed:	08/26/20	
Sample Matrix:	Water						Date Extra	cted:	NA	
			Duplicat	e Lab Co	ntrol Samp	ole Summary				
			Volatile	Organic (Compound	s by GC/MS				
Analysis Method:	8260C						Units:		ug/L	
Prep Method:	None						Basis:		NA	
							Analysis Lo	ot:	692734	
		La	b Control Sampl	e	D	uplicate Lab Co	ontrol Sam	ple		
			KQ2012140-10			- KQ20121	40-11	-		
								% Rec		
Analyte Name		Result	Spike Amount	% Rec	Result	Spike Amount	t % Rec	Limits	RPD	RPD Limit
cis-1,2-Dichloroethen	e	9.09	10.0	91	9.66	10.0	97	71-118	6	30
Tetrachloroethene (PC	CE)	9.69	10.0	97	9.78	10.0	98	62-126	<1	30
trans-1,2-Dichloroethe	ene	9.15	10.0	92	9.36	10.0	94	67-125	2	30
Trichloroethene (TCE)	9.54	10.0	95	9.58	10.0	96	67-128	<1	30
Vinyl Chloride		9.72	10.0	97	10.0	10.0	100	55-123	3	30

QA/QC Report

Client:	Anchor	QEA, LL	.C				Service Red	quest:	K2007073	3
Project:	Carson	Cleaners	Facility/200544-0	1.01			Date Analy	zed:	08/31/20	
Sample Matrix:	Water						Date Extra	cted:	NA	
			Duplicat	e Lab Coi	ntrol Samp	ole Summary				
			Volatile	Organic (Compound	s by GC/MS				
Analysis Method:	8260C						Units:		ug/L	
Prep Method:	None						Basis:		NA	
-							Analysis Lo	ot:	693379	
		La	b Control Sampl	e	D	uplicate Lab Co	ontrol Sam	ple		
			KQ2012395-05			KQ20123	95-06			
								% Rec		
Analyte Name		Result	Spike Amount	% Rec	Result	Spike Amount	t % Rec	Limits	RPD	RPD Limit
cis-1,2-Dichloroethene	e	8.74	10.0	87	8.71	10.0	87	71-118	<1	30
Tetrachloroethene (PC	CE)	9.04	10.0	90	8.81	10.0	88	62-126	3	30
trans-1,2-Dichloroethe	ene	8.65	10.0	87	8.48	10.0	85	67-125	2	30
Trichloroethene (TCE)	8.87	10.0	89	8.79	10.0	88	67-128	<1	30
Vinyl Chloride		8.83	10.0	88	8.83	10.0	88	55-123	<1	30

QA/QC Report

Client:Anchor QEA, LLCProject:Carson Cleaners Facility/200544-01.01Sample Matrix:Water

Service Request: K2007073

SURROGATE RECOVERY SUMMARY

Volatile Petroleum Products by GC/FID

Analysis Method:	NWTPH-Gx
Extraction Method:	None

		1,4-Difluorobenzene	
Sample Name	Lab Code	50-150	
CC-MW-01-20200814	K2007073-002	103	
Trip Blank	K2007073-003	101	
CC-MW-01-20200814	KQ2011831-10	108	
CC-MW-01-20200814	KQ2011993-07	104	
Method Blank	KQ2011993-05	104	
Lab Control Sample	KQ2011993-06	106	

QA/QC Report

Client:	Anchor QEA, LLC					Service Request:	K20070	73
Project	Carson Cleaners Fac	cility/200544-01.01	l			Date Collected:	08/14/20)
Sample Matrix:	Water					Date Received:	08/18/20)
						Date Analyzed:	08/24/20)
		Replic	cate Samp	ole Summary				
		Volatile Petr	roleum P	roducts by G	C/FID			
Sample Name:	CC-MW-01-20200	814				Units:	ug/L	
Lab Code:	K2007073-002					Basis:	NA	
				Sample	Duplicate Sample KQ2011831- 10			
Analyte Name	1	Analysis Method	MRL	Result	Result	Average	RPD	RPD Limit
Gasoline Range Organics GRO)	(Toluene-Naphthalene	NWTPH-Gx	250	1860	1600	1730	15	30

Results flagged with an asterisk (*) indicate values outside control criteria.

Results flagged with a pound (#) indicate the control criteria is not applicable.

Percent recoveries and relative percent differences (RPD) are determined by the software using values in the calculation which have not been rounded.

QA/QC Report

Client:	Anchor QEA, LLC					Service Request:	K20070	73
Project	Carson Cleaners Fac	cility/200544-01.01	-			Date Collected:	08/14/20)
Sample Matrix:	Water					Date Received:	08/18/20)
						Date Analyzed:	08/25/20)
		Replic	ate Samj	ple Summary				
		Volatile Petr	oleum P	roducts by G	C/FID			
Sample Name:	CC-MW-01-20200	814				Units:	ug/L	
Lab Code:	K2007073-002					Basis:	NA	
				Samnle	Duplicate Sample KQ2011993- 07			
Analyte Name	1	Analysis Method	MRL	Result	Result	Average	RPD	RPD Limit
Gasoline Range Organics GRO)	(Toluene-Naphthalene	NWTPH-Gx	250	1860	1810	1840	3	30

Results flagged with an asterisk (*) indicate values outside control criteria.

Results flagged with a pound (#) indicate the control criteria is not applicable.

Percent recoveries and relative percent differences (RPD) are determined by the software using values in the calculation which have not been rounded.

		Analytical Rep	ort			
Client:	Anchor QEA, LLC			Service	Request: K2007073	
Project:	Carson Cleaners Facility	y/200544-01.01		Date (Collected: NA	
Sample Matrix:	Water			Date 1	Received: NA	
Sample Name:	Method Blank				Units: ug/L	
Lab Code:	KQ2011993-05				Basis: NA	
		Volatile Petroleum Produ	icts by GC/FID			
Analysis Method:	NWTPH-Gx					
Prep Method:	None					
Analyte Name		Result	MRL	Dil.	Date Analyzed	Q
Gasoline Range Orga Naphthalene GRO)	anics (Toluene-	ND U	250	1	08/25/20 12:44	
Surrogate Name		% Rec	Control L in	nits Data	Analyzed O	

104

50 - 150

08/25/20 12:44

1,4-Difluorobenzene

QA/QC Report

Client: Project: Sample Matrix:	Anchor QEA, LLC Carson Cleaners Facility/2 Water	200544-01.01	S I I	Service Request: Date Analyzed: Date Extracted:	K2007073 08/25/20 NA
		Lab Control Sampl Volatile Petroleum Prod	e Summary lucts by GC/FID		
Analysis Method: Prep Method:	NWTPH-Gx None		U H A	Jnits: Basis: Analysis Lot:	ug/L NA 692636
			Lab Control Sample KQ2011993-06		
Analyte Name Gasoline Range Organ	ics (Toluene-Naphthalene	Result 498	Spike Amount 500	% Rec 100	% Rec Limits 80-119
GRO)					

Service Request No:K2007075



Nathan Soccorsy Anchor QEA, LLC 720 Olive Way, Suite 1900 Seattle, WA 98101

Laboratory Results for: Carson Cleaners Facility

Dear Nathan,

Enclosed are the results of the sample(s) submitted to our laboratory August 18, 2020 For your reference, these analyses have been assigned our service request number **K2007075**.

Analyses were performed according to our laboratory's NELAP-approved quality assurance program. The test results meet requirements of the current NELAP standards, where applicable, and except as noted in the laboratory case narrative provided. For a specific list of NELAP-accredited analytes, refer to the certifications section at www.alsglobal.com. All results are intended to be considered in their entirety, and ALS Group USA Corp. dba ALS Environmental (ALS) is not responsible for use of less than the complete report. Results apply only to the items submitted to the laboratory for analysis and individual items (samples) analyzed, as listed in the report.

Please contact me if you have any questions. My extension is 3376. You may also contact me via email at Mark.Harris@alsglobal.com.

Respectfully submitted,

ALS Group USA, Corp. dba ALS Environmental

noe D. Dan

Mark Harris Project Manager

> ADDRESS 1317 S. 13th Avenue, Kelso, WA 98626 PHONE +1 360 577 7222 | FAX +1 360 636 1068 ALS Group USA, Corp. dba ALS Environmental



Narrative Documents

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Client:Anchor QEA, LLCProject:Carson Cleaners Facility

Service Request: K2007075 Date Received: 08/18/2020

Sample Matrix: Water

CASE NARRATIVE

All analyses were performed consistent with the quality assurance program of ALS Environmental. This report contains analytical results for samples for the Tier II level requested by the client.

Sample Receipt:

One water sample was received for analysis at ALS Environmental on 08/18/2020. Any discrepancies upon initial sample inspection are annotated on the sample receipt and preservation form included within this report. The sample was stored at minimum in accordance with the analytical method requirements.

Semivoa GC:

No significant anomalies were noted with this analysis.

noe D. Dan

Approved by

Date

08/25/2020



Sample Receipt Information

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Service Request:K2007075

Client:Anchor QEA, LLCProject:Carson Cleaners Facility/200544-01.01

SAMPLE CROSS-REFERENCE

SAMPLE #	CLIENT SAMPLE ID	DATE	TIME
K2007075-001	CC-MW-01-20200814	8/14/2020	1500

		H f			N N N N N N N N N N N N N N N N N N N			Cł	IAI	N O	F CUSTODY	001		SR#	126070751
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		enny, gering Ser samp, S	131	17 Souti	n 13th	Ave, K	(elso, '	WA 98	∎ 626 P	hone	(360) 577-7222 / 800-695	-7222 / FAX (360)) 636-1068	COC#	
Project Name	Project N	umber:		T	1	r			V	www.a	alsglobal.com	۳	,		Page 1 of 1
Project Manager	TUGH 20	0544-01.01		1	1 40										
Company Autority Oct	eonsy			RS				T	T						
Address	. #76n	South La	9¢101	AINE	ΗĴ				Í						
Phone # 2010 29 29120	email A	POLOG & LAVINA	(0~() = A - () = (NO:	v_TP										
Sampler Signature	Sampler f	Printed Name	((,	ů.	w/w										
885	STE	pter smeth		NUMBER	имтрн-с	-	~	5	4	5	Remarks				
CLIENT SAMPLE ID		SAMPLING Date Time	Matrix				T	T							
1. CC-MW-01-2020081	4	8-14-2020 1500	4-0	5	\propto			-			· · · · · ·				
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6.		-5B)													
7.															
8.															
9.															
10. Const Bonuiremente															
Report Requirements	P.O.#	le information										Circle which me	etals are to be analyzed		
Blank, Surrogate, as	Bill To:	LETSA SCHUMA	Her.			Total	Meta	ls: Al	As	s SI	b Ba Be B Ca C	d Co Cr Cu	Fe Pb Mg Mn Mo Ni K	Ag Na Se S	Sr TI Sn V Zn Hg
I Report Dup, MS, MSD	Ischum	acher Q			Di	ssolve	ed Me	tals:	AI .	As	Sb Ba Be B Ca	Cd Co Cr C	Cu Fe Pb Mg Mn Mo Ni k	< Ag Na Se	Sr TI Sn V Zn Hg
as required		AWCHMAER .C	S S	pecial	Instr	ructio	ns/C	omn	nent	s:	*Indic	cate State Hy	drocarbon Procedure: AK C	A WICNorthy	vest Other (Circle One)
III. CLP Like Summary	l urnarc	Dund Requiremen	ts												
IV. Data Validation Report	51 St	Day andard													
V. EDD		Province of Parad													
Relinquished By:	ALT	Received By:		Relinquished By:						Received By:		Relinquished By	<i>r</i> :	Received By:	
Signature S S	Signature	KIMANAY -	/ Signa	ature			,			Si	gnature		Signature	Sigi	nature
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FIRM ANCHUN DER	58IV	10 MASU	Firm							Fi	m		Firm	Fim	n
Date/Time 5-13-10	Date/Time		Date	Time						Da	ate/Time		Date/Time	Dat	e/Time
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							DA MH
Client	ichne	OP Opened:	Cooler Receipt an A SIIS 20	nd Preservation Servic	n Form ce Request <i>K20</i> Unloaded:	070	15 15 27
 Samples we Samples we 	re received via? re received in: (cir	USPS	Fed Ex ooler Box	S DHL Envelope	PDX Co	ourier Hand	Delivered NA
 Were <u>custod</u> If present, w Was a Tempe 	<u>y seals</u> on coolers? ere custody seals in rature Blank prese	ntact? nt in cooler?	NA (Y) N If y (Y) N If p NA Y N If y	es, how many and wh resent, were they sigr res, notate the tempera	nere? ned and dated? ature in the appropr	iate column below:	Ŷ N
If no, take th 5. Were samples If no, were th If applicable, tis	te temperature of a s received within the ney received on ice sue samples were t	representativ ne method spe and same day received:	e sample bottle contained cified temperature ranges? y as collected? If not, notat Frozen Partially Thay	within the cooler; not ? te the cooler # below :	ate in the column " and notify the PM.	Sample Temp": NA NA	Y N Y N
Temp Blank	Sample Temp	IR Gun	Cooler #/COC ID / NA	Out of temp	PM Notified If out of temp	Tracking N	umber NA Filed
5.8 Le.0		WO1	ЧЭ-			3958 88	50.8577
 Packing ma Were custo 	terial: Inserts dy papers properly	Baggies Bu	(, signed, etc.)?	Wet Ice Dry Ice	Sleeves	NA	Y N
 Were samp. Were all sam Did all sam 	nes received in goo mple labels comple ple labels and tags	d condition (t ete (ie, analysi agree with cu	inbroken) is, preservation, etc.)? istody papers?			NA NA NA	ZZZ Z
 Were appro Were the pl Were VOA 	Priate bottles/conta H-preserved bottles vials received with	ainers and vol s (<i>see SMO G</i> hout headspac	umes received for the tests EN SOP) received at the a ce? Indicate in the table be	s indicated? ppropriate pH? Indic elow.	ate in the table belo	W (NA)	Y N Y N Y N
14. Was C12/R	es negative?						Y N

Sample ID on Bottle	Sample ID on COC	Identified by:

Sample ID	Bottle Count Bottle Type	Head- space	Broke	рН	Reagent	Volume added	Reagent Lot Number	Initials	Time
	· · · · · · · · · · · · · · · · · · ·								
Notes, Discrepancies, Resolutions	'd J J	ai	L NA	L.	- ma	50	S MMLei	L I Z A	<u>C</u> AC



Miscellaneous Forms

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Page 8 of 20
Inorganic Data Qualifiers

- * The result is an outlier. See case narrative.
- # The control limit criteria is not applicable. See case narrative.
- B The analyte was found in the associated method blank at a level that is significant relative to the sample result as defined by the DOD or NELAC standards.
- E The result is an estimate amount because the value exceeded the instrument calibration range.
- J The result is an estimated value.
- U The analyte was analyzed for, but was not detected ("Non-detect") at or above the MRL/MDL. DOD-QSM 4.2 definition : Analyte was not detected and is reported as less than the LOD or as defined by the project. The detection limit is adjusted for dilution.
- i The MRL/MDL or LOQ/LOD is elevated due to a matrix interference.
- X See case narrative.
- Q See case narrative. One or more quality control criteria was outside the limits.
- H The holding time for this test is immediately following sample collection. The samples were analyzed as soon as possible after receipt by the laboratory.

Metals Data Qualifiers

- # The control limit criteria is not applicable. See case narrative.
- J The result is an estimated value.
- E The percent difference for the serial dilution was greater than 10%, indicating a possible matrix interference in the sample.
- M The duplicate injection precision was not met.
- N The Matrix Spike sample recovery is not within control limits. See case narrative.
- S The reported value was determined by the Method of Standard Additions (MSA).
- U The analyte was analyzed for, but was not detected ("Non-detect") at or above the MRL/MDL.
- DOD-QSM 4.2 definition : Analyte was not detected and is reported as less than the LOD or as defined by the project. The detection limit is adjusted for dilution.
- W The post-digestion spike for furnace AA analysis is out of control limits, while sample absorbance is less than 50% of spike absorbance.
- $i \,$ $\,$ The MRL/MDL or LOQ/LOD is elevated due to a matrix interference.
- X See case narrative.
- + The correlation coefficient for the MSA is less than 0.995.
- Q See case narrative. One or more quality control criteria was outside the limits.

Organic Data Qualifiers

- * The result is an outlier. See case narrative.
- # The control limit criteria is not applicable. See case narrative.
- A A tentatively identified compound, a suspected aldol-condensation product.
- B The analyte was found in the associated method blank at a level that is significant relative to the sample result as defined by the DOD or NELAC standards.
- C The analyte was qualitatively confirmed using GC/MS techniques, pattern recognition, or by comparing to historical data.
- D The reported result is from a dilution.
- E The result is an estimated value.
- J The result is an estimated value.
- N The result is presumptive. The analyte was tentatively identified, but a confirmation analysis was not performed.
- P The GC or HPLC confirmation criteria was exceeded. The relative percent difference is greater than 40% between the two analytical results.
- U The analyte was analyzed for, but was not detected ("Non-detect") at or above the MRL/MDL.
 DOD-QSM 4.2 definition : Analyte was not detected and is reported as less than the LOD or as defined by the project. The detection limit is adjusted for dilution.
- i The MRL/MDL or LOQ/LOD is elevated due to a chromatographic interference.
- X See case narrative.
- Q See case narrative. One or more quality control criteria was outside the limits.

Additional Petroleum Hydrocarbon Specific Qualifiers

- ${f F}$ The chromatographic fingerprint of the sample matches the elution pattern of the calibration standard.
- L The chromatographic fingerprint of the sample resembles a petroleum product, but the elution pattern indicates the presence of a greater amount of lighter molecular weight constituents than the calibration standard.
- H The chromatographic fingerprint of the sample resembles a petroleum product, but the elution pattern indicates the presence of a greater amount of heavier molecular weight constituents than the calibration standard.
- O The chromatographic fingerprint of the sample resembles an oil, but does not match the calibration standard.
- Y The chromatographic fingerprint of the sample resembles a petroleum product eluting in approximately the correct carbon range, but the elution pattern does not match the calibration standard.
- Z The chromatographic fingerprint does not resemble a petroleum product.

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ALS Group USA Corp. dba ALS Environmental (ALS) - Kelso State Certifications, Accreditations, and Licenses

Web Site	Number
http://dec.alaska.gov/eh/lab/cs/csapproval.htm	UST-040
http://www.azdhs.gov/lab/license/env.htm	AZ0339
http://www.adeq.state.ar.us/techsvs/labcert.htm	88-0637
http://www.cdph.ca.gov/certlic/labs/Pages/ELAP.aspx	2795
http://www.denix.osd.mil/edqw/Accreditation/AccreditedLabs.cfm	L16-58-R4
http://www.doh.state.fl.us/lab/EnvLabCert/WaterCert.htm	E87412
http://health.hawaii.gov/	-
http://www.pjlabs.com/	L16-57
http://www.deq.louisiana.gov/page/la-lab-accreditation	03016
http://www.maine.gov/dhhs/	WA01276
http://www.health.state.mn.us/accreditation	053-999-457
http://ndep.nv.gov/bsdw/labservice.htm	WA01276
http://www.nj.gov/dep/enforcement/oqa.html	WA005
https://www.wadsworth.org/regulatory/elap	12060
https://deq.nc.gov/about/divisions/water-resources/water-resources- data/water-sciences-home-page/laboratory-certification-branch/non-field-lab- certification	605
http://www.deq.state.ok.us/CSDnew/labcert.htm	9801
http://public.health.oregon.gov/LaboratoryServices/EnvironmentalLaborator yAccreditation/Pages/index.aspx	WA100010
http://www.scdhec.gov/environment/EnvironmentalLabCertification/	61002
http://www.tceq.texas.gov/field/qa/env_lab_accreditation.html	T104704427
http://www.ecy.wa.gov/programs/eap/labs/lab-accreditation.html	C544
https://www.epa.gov/region8-waterops/epa-region-8-certified-drinking-water-	-
www.alsglobal.com	NA
	Web Site http://dec.alaska.gov/eh/lab/cs/csapproval.htm http://www.azdhs.gov/lab/license/env.htm http://www.adeq.state.ar.us/techsvs/labcert.htm http://www.adeq.state.ar.us/techsvs/labcert.htm http://www.depi.ca.gov/certlic/labs/Pages/ELAP.aspx http://www.denix.osd.mil/edqw/Accreditation/AccreditedLabs.cfm http://www.denix.osd.mil/edqw/Accreditation/AccreditedLabs.cfm http://www.doh.state.fl.us/lab/EnvLabCert/WaterCert.htm http://health.hawaii.gov/ http://www.pilabs.com/ http://www.maine.gov/dhks/ http://www.maine.gov/dhks/ http://www.health.state.mn.us/accreditation http://www.ng.gov/dep/enforcement/oqa.html http://www.ng.gov/dep/enforcement/oqa.html http://www.adsworth.org/regulatory/elap http://www.adsworth.org/regulatory/certification-branch/non-field-lab-certification http://www.deq.state.ok.us/CSDnew/labcert.htm http://www.deq.state.ok.us/CSDnew/labcert.htm http://www.deq.state.ok.us/CSDnew/labcert.htm http://www.deq.state.ok.us/csDnew/labcert.htm http://www.scdhec.gov/environment/EnvironmentalLabCertification/ http://www.scdhec.gov/programs/eap/labs/lab-accreditation.html http://www.keq.state.ow.us/programs/eap/labs/lab-accreditation.

Analyses were performed according to our laboratory's NELAP-approved quality assurance program. A complete listing of specific NELAP-certified analytes, can be found in the certification section at www.ALSGlobal.com or at the accreditation bodies web site.

Please refer to the certification and/or accreditation body's web site if samples are submitted for compliance purposes. The states highlighted above, require the analysis be listed on the state certification if used for compliance purposes and if the method/anlayte is offered by that state.

Acronyms

ASTM	American Society for Testing and Materials
A2LA	American Association for Laboratory Accreditation
CARB	California Air Resources Board
CAS Number	Chemical Abstract Service registry Number
CFC	Chlorofluorocarbon
CFU	Colony-Forming Unit
DEC	Department of Environmental Conservation
DEQ	Department of Environmental Quality
DHS	Department of Health Services
DOE	Department of Ecology
DOH	Department of Health
EPA	U. S. Environmental Protection Agency
ELAP	Environmental Laboratory Accreditation Program
GC	Gas Chromatography
GC/MS	Gas Chromatography/Mass Spectrometry
LOD	Limit of Detection
LOQ	Limit of Quantitation
LUFT	Leaking Underground Fuel Tank
M MCL	Modified Maximum Contaminant Level is the highest permissible concentration of a substance allowed in drinking water as established by the USEPA.
MDL	Method Detection Limit
MPN	Most Probable Number
MRL	Method Reporting Limit
NA	Not Applicable
NC	Not Calculated
NCASI	National Council of the Paper Industry for Air and Stream Improvement
ND	Not Detected
NIOSH	National Institute for Occupational Safety and Health
PQL	Practical Quantitation Limit
RCRA	Resource Conservation and Recovery Act
SIM	Selected Ion Monitoring
TPH tr	Total Petroleum Hydrocarbons Trace level is the concentration of an analyte that is less than the PQL but greater than or equal to the MDL.

Analyst Summary report

Client:Anchor QEA, LLCProject:Carson Cleaners Facility/200544-01.01

Service Request: K2007075

 Sample Name:
 CC-MW-01-20200814

 Lab Code:
 K2007075-001

 Sample Matrix:
 Water

Date Collected: 08/14/20 **Date Received:** 08/18/20

Analysis Method NWTPH-Dx Extracted/Digested By WVANDERHOFF Analyzed By TPOTTSCHMIDT



Sample Results

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Semivolatile Organic Compounds by GC

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Analytical Report **Client:** Service Request: K2007075 Anchor QEA, LLC Date Collected: 08/14/20 15:00 **Project:** Carson Cleaners Facility/200544-01.01 Sample Matrix: Water Date Received: 08/18/20 09:50 Sample Name: CC-MW-01-20200814 Units: ug/L Lab Code: K2007075-001 Basis: NA

Semi-Volatile Petroleum Products by GC/FID

Analysis Method:	NWTPH-Dx
Prep Method:	EPA 3510C

Analyte Name	Result	MRL	Dil.	Date Analyzed	Date Extracted	Q
Diesel Range Organics (C12 - C25 DRO)	ND U	250	1	08/21/20 12:28	8/19/20	
Residual Range Organics (C25 - C36 RRO)	ND U	500	1	08/21/20 12:28	8/19/20	

Surrogate Name	% Rec	Control Limits	Date Analyzed	Q
o-Terphenyl	67	50 - 150	08/21/20 12:28	
n-Triacontane	71	50 - 150	08/21/20 12:28	



QC Summary Forms

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Semivolatile Organic Compounds by GC

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QA/QC Report

Service Request: K2007075

Client:Anchor QEA, LLCProject:Carson Cleaners Facility/200544-01.01Sample Matrix:Water

SURROGATE RECOVERY SUMMARY

Semi-Volatile Petroleum Products by GC/FID

Analysis Method:	NWTPH-Dx	
Extraction Method:	EPA 3510C	

		o-Terphenyl	n-Triacontane	
Sample Name	Lab Code	50-150	50-150	
CC-MW-01-20200814	K2007075-001	67	71	
Method Blank	KQ2011562-03	79	84	
Lab Control Sample	KQ2011562-01	73	74	
Duplicate Lab Control Sample	KQ2011562-02	86	87	

	А	nalytical Report	
Client:	Anchor QEA, LLC	Service Request: K	\$2007075
Project:	Carson Cleaners Facility/200544-01.01	Date Collected: N	NA
Sample Matrix:	Water	Date Received: N	NA
Sample Name:	Method Blank	Units: u	ıg/L
Lab Code:	KQ2011562-03	Basis: N	NA

Semi-Volatile Petroleum Products by GC/FID

Analysis Method:	NWTPH-Dx		
Prep Method:	EPA 3510C		

Analyte Name	Result	MRL	Dil.	Date Analyzed	Date Extracted	Q
Diesel Range Organics (C12 - C25 DRO)	ND U	250	1	08/21/20 12:06	8/19/20	
Residual Range Organics (C25 - C36 RRO)	ND U	500	1	08/21/20 12:06	8/19/20	

Surrogate Name	% Rec	Control Limits	Date Analyzed	Q
o-Terphenyl	79	50 - 150	08/21/20 12:06	
n-Triacontane	84	50 - 150	08/21/20 12:06	

QA/QC Report

Client:	Anchor QEA, LLC	2	Service Request:	K2007075
Project:	Carson Cleaners F	acility/200544-01.01	Date Analyzed:	08/21/20
Sample Matrix:	Water		Date Extracted:	08/19/20
		Duplicate Lab Control Sa	ample Summary	
		Semi-Volatile Petroleum Pr	oducts by GC/FID	
Analysis Method:	NWTPH-Dx		Units:	ug/L
Prep Method:	EPA 3510C		Basis:	NA
			Analysis Lot:	691921
		Lab Control Sample	Duplicate Lab Control Sample	e
		KQ2011562-01	KQ2011562-02	
		Spike	Spike %	% Rec

		Spike			Spike		% Rec		RPD
Analyte Name	Result	Amount	% Rec	Result	Amount	% Rec	Limits	RPD	Limit
Diesel Range Organics (C12 - C25 DRO)	2580	3200	81	3070	3200	96	46-140	17	30
Residual Range Organics (C25 - C36	1280	1600	80	1530	1600	95	45-159	18	30
RRO)									

Service Request No:K2010780



Nathan Soccorsy Anchor QEA, LLC 720 Olive Way, Suite 1900 Seattle, WA 98101

Laboratory Results for: Carson Cleaners Facility

Dear Nathan,

Enclosed are the results of the sample(s) submitted to our laboratory November 19, 2020 For your reference, these analyses have been assigned our service request number **K2010780**.

Analyses were performed according to our laboratory's NELAP-approved quality assurance program. The test results meet requirements of the current NELAP standards, where applicable, and except as noted in the laboratory case narrative provided. For a specific list of NELAP-accredited analytes, refer to the certifications section at www.alsglobal.com. All results are intended to be considered in their entirety, and ALS Group USA Corp. dba ALS Environmental (ALS) is not responsible for use of less than the complete report. Results apply only to the items submitted to the laboratory for analysis and individual items (samples) analyzed, as listed in the report.

Please contact me if you have any questions. My extension is 3376. You may also contact me via email at Mark.Harris@alsglobal.com.

Respectfully submitted,

ALS Group USA, Corp. dba ALS Environmental

noe D. Dan

Mark Harris Project Manager

> ADDRESS 1317 S. 13th Avenue, Kelso, WA 98626 PHONE +1 360 577 7222 | FAX +1 360 636 1068 ALS Group USA, Corp. dba ALS Environmental



Narrative Documents

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Client:Anchor QEA, LLCProject:Carson Cleaners FacilitySample Matrix:Water, Ground Water

Service Request: K2010780 Date Received: 11/19/2020

CASE NARRATIVE

All analyses were performed consistent with the quality assurance program of ALS Environmental. This report contains analytical results for samples for the Tier II level requested by the client.

Sample Receipt:

Three water, ground water samples were received for analysis at ALS Environmental on 11/19/2020. Any discrepancies upon initial sample inspection are annotated on the sample receipt and preservation form included within this report. The samples were stored at minimum in accordance with the analytical method requirements.

Semivoa GC:

No significant anomalies were noted with this analysis.

Volatiles by GC/MS:

No significant anomalies were noted with this analysis.

noe D. Dan

Approved by

Date

12/07/2020



SAMPLE DETECTION SUMMARY

CLIENT ID: CC-MW-01-20201118		Lab	ID: K2010	780-001		
Analyte	Results	Flag	MDL	MRL	Units	Method
Gasoline Range Organics (Toluene- Naphthalene GRO)	2020			250	ug/L	NWTPH-Gx
Tetrachloroethene (PCE)	2700			50	ug/L	8260C
Trichloroethene (TCE)	140			5.0	ug/L	8260C
cis-1,2-Dichloroethene	63			5.0	ug/L	8260C
CLIENT ID: CC-MW-1001-20201118		Lab	ID: K2010	780-002		
Analyte	Results	Flag	MDL	MRL	Units	Method
Gasoline Range Organics (Toluene- Naphthalene GRO)	2050			250	ug/L	NWTPH-Gx
Tetrachloroethene (PCE)	2600			50	ug/L	8260C
Trichloroethene (TCE)	140			5.0	ug/L	8260C
cis-1,2-Dichloroethene	66			5.0	ug/L	8260C



Sample Receipt Information

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Client:Anchor QEA, LLCProject:Carson Cleaners Facility/200544-01.01

SAMPLE CROSS-REFERENCE

<u>SAMPLE #</u>	CLIENT SAMPLE ID	DATE	TIME
K2010780-001	CC-MW-01-20201118	11/18/2020	1055
K2010780-002	CC-MW-1001-20201118	11/18/2020	1100
K2010780-003	CC-TB-20201118	11/18/2020	1000

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(ALS) Enuire)nme	inco	1.11.11 (j.11	131	7 Souti	h 13th	Ave, ł	Kelso,	WA 9	8626	Phone www.a	(360) alsgiol) 577-7 bal.co	'222 / 800-695-7222 / FAX (n	360) 636-1068		Page 1 of 1
Project Name CARSEN CLEANING FALFL	Project Nu Prv 2.0	5 44	- 01.0				4										
Project Manager NATHAN SOC	ronsy					ļ	÷	_									
Company ANCHOR GEN	<i>y</i>			*****	1 ERS												
Address 1201 300 AVE # 2000	, SEATTLE	, wh , '	15101				H	SAS									
Phone # 2062879130	email LABD	ATRQA	viction Qu	A - 65M	- Ŝ	6	M	Ň									
Sampler Signature Stop in Smorth	Sampler P STEP	rinted Name PHEN STY	2542		NUMBER OF	B260C / VOC	NWTPH-Dx / I	NWTPH-Gx /		2	3	4	LO.	Remarks			
CLIENT SAMPLE ID		SAMP Date	LING	Matrix													
1. C-MW-01-20201118		11-18-1020	1055	6 W	l ×	X	$\overline{\mathbf{x}}$	×									
2.00 - MW - 1001 - 20201118		11-18-7-7	1100	Gw	8	1	×	$\boldsymbol{\lambda}$									
3.ci-TB - 20201118		11-18-2020	1900	WQ	2	×		x									
4													>				
5.	******																
6.		~	1020			Ī											
7.	11	-18-1			t												
8.	55					1											
9.																	
10							F					-	- 1				
Report Requirements	Invo	oice Infor	mation		6	.	.							Circle whic	h metals are to be analyzed		
 I. Routine Report: Method Blank, Surrogate, as required II. Report Dup., MS, MSD 	P.O.# <u>}</u> Bill To: <u>Lschv</u>	MACHEN	- c1. c1 .@			D	Tota	I Meta	als: A letais	N A : Al	s S As	b B Sb	a B∉ Ba	e B Ca Cd Co Cr Be B Ca Cd Co C	Cu Fe Po Mg Mn Mo Ni K Cr Cu Fe Po Mg Mn Mo Ni I	Ag Na Se Sr K Ag Na Se S	TI Sn V Zn Hg r Ti Sn V Zn Hg
as required III. CLP Like Summary (no raw data)	Turnarc 24 51	bund Rec	uireme	nts S	pecia	linst	ructi	ons/(Com	men	ts:			*Indicate State	Hydrocarbon Procedure: AK C	X WI (Northwe	st) Other(Circle One)
V. EDD	$\overline{\frown}$																
Relinquished By:	A	Received	By:		Re	linq	uish	ned	By:				F	Received By:	Relinquished B	y:	Received By:
Signature	Signature	HIM	ANE	- Sign	ature						S	ignat	ture		Signature	Signa	ture
Printed Name STEDIKEN STREATL	Printed Na	inte HUS	·····	Print	ed Na	ame					Pi	rinte	d Na	me	Printed Name	Printe	d Name
Firm Awiltur act	Firm	7011	20	Firm							Fi	rm			Firm	Firm	
Date/Time/1/18/2020 1330	Date/Time	~~~	, , , , , , , , , , , , , , , , , , ,	Date	/Time	; ;					D	ate/1	lime		Date/Time	Date/	Time

\cap						•	PM MH-
A	1617 c.c		Cooler Receipt an	d Preservatio	on Form	1078	$\sim $
Client	HCILIK	QE	Ht.	Serv	vice Request K20	1070	SAD.
Received: 11	19720	Opened: [Щ19120в	* 1/2/	_Unloaded: <u>[[</u>	<u>14720 </u> Ву:	PR
1. Samples we	ere received via?	USPS	Fed Ex UPS	DHL	PDX Co	urier Hand D	elivered
2. Samples we	ere received in: (ci	rcle) (<i>E</i>	Box	Envelope	Other	11 10:01	NA
3. Were <u>custoc</u>	ly seals on coolers	?	NA Y N If ye	s, how many and w	vhere?	ITVONE	
A Was a Temps	vere custody seals	intact?	N If pro	esent, were they sig	gned and dated?	<u> </u>	^y N
If no. take the	he temperature of a	an in coorci : i representativ	sample bottle contained w	s, notate the tempe	rature in the column "S	are column below:	
5. Were sample	s received within t	he method spe	cified temperature ranges?	ann aic cooicr, ia	hate in the column 3	NA Y	N
If no, were th	hey received on ice	e and same day	as collected? If not, notate	the cooler # below	and notify the PM.		N
If applicable, tis	ssue samples were	received:	rozen Partially Thawe	d Thawed	2	\smile	
		ł		Selectron (12 in subserved)		and the second	
			_	Out of terms	PM		
Temp Blank	Sample Temp	IR Gun	Cooler #/COC ID/I NA	indicate with "X	" If out of temp	Tracking Num	ber NA Filed
d.y	Population and a second s	IIKOL_				599101887	350
~							
			······				
L							
Packing ma	iterial: Inserts	Baggies	bble Wrap Gel Packs V	Vet Ice Dry Ice	Sleeves		
7. Were custo	dy papers property	filled out (ink	, signed, etc.)?	Management of Second Second Second		NA (Y	N
 Were samp Were all samp 	les received in goo mple labels comple	d condition (u ete (ie. analysi:	nbroken) s. preservation_etc.)?			$\begin{array}{c} NA \qquad (Y) \\ NA \qquad (Y) \end{array}$	X N Y N
10. Did all sam	ple labels and tags	agree with cu	stody papers?			NA Y	N
11. Were appro	priate bottles/cont	ainers and volu	mes received for the tests i	indicated?		NA (Y	⁾ N
12. Were the pl	H-preserved bottle	s (see SMO GE	EN SOP) received at the app	propriate pH? India	cate in the table below	v NA Y	N
13. Were VOA	vials received with	hout headspace	? Indicate in the table belo	ow.		NA Y	N
14. Was C12/R	es negative?						N
Sa	mple ID on Bott	le	Sample ID c	on COC		Identified by:	
	·····						
	······						
					171.7717.51777WEVCLU		
	Sample iD		Bottle Count Hea Bottle Type space	d- ce Broke nH	Reagent added	Reagent Lot	Initials Time
	Ŧ						
	······································						

Notes, Discrepancies, Resolutions:_____

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Inorganic Data Qualifiers

- * The result is an outlier. See case narrative.
- # The control limit criteria is not applicable. See case narrative.
- B The analyte was found in the associated method blank at a level that is significant relative to the sample result as defined by the DOD or NELAC standards.
- E The result is an estimate amount because the value exceeded the instrument calibration range.
- J The result is an estimated value.
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- i The MRL/MDL or LOQ/LOD is elevated due to a matrix interference.
- X See case narrative.
- Q See case narrative. One or more quality control criteria was outside the limits.
- H The holding time for this test is immediately following sample collection. The samples were analyzed as soon as possible after receipt by the laboratory.

Metals Data Qualifiers

- # The control limit criteria is not applicable. See case narrative.
- J The result is an estimated value.
- E The percent difference for the serial dilution was greater than 10%, indicating a possible matrix interference in the sample.
- M The duplicate injection precision was not met.
- N The Matrix Spike sample recovery is not within control limits. See case narrative.
- S The reported value was determined by the Method of Standard Additions (MSA).
- U The analyte was analyzed for, but was not detected ("Non-detect") at or above the MRL/MDL.
- DOD-QSM 4.2 definition : Analyte was not detected and is reported as less than the LOD or as defined by the project. The detection limit is adjusted for dilution.
- W The post-digestion spike for furnace AA analysis is out of control limits, while sample absorbance is less than 50% of spike absorbance.
- $i \,$ $\,$ The MRL/MDL or LOQ/LOD is elevated due to a matrix interference.
- X See case narrative.
- + The correlation coefficient for the MSA is less than 0.995.
- Q See case narrative. One or more quality control criteria was outside the limits.

Organic Data Qualifiers

- * The result is an outlier. See case narrative.
- # The control limit criteria is not applicable. See case narrative.
- A A tentatively identified compound, a suspected aldol-condensation product.
- B The analyte was found in the associated method blank at a level that is significant relative to the sample result as defined by the DOD or NELAC standards.
- C The analyte was qualitatively confirmed using GC/MS techniques, pattern recognition, or by comparing to historical data.
- D The reported result is from a dilution.
- E The result is an estimated value.
- J The result is an estimated value.
- N The result is presumptive. The analyte was tentatively identified, but a confirmation analysis was not performed.
- P The GC or HPLC confirmation criteria was exceeded. The relative percent difference is greater than 40% between the two analytical results.
- U The analyte was analyzed for, but was not detected ("Non-detect") at or above the MRL/MDL.
 DOD-QSM 4.2 definition : Analyte was not detected and is reported as less than the LOD or as defined by the project. The detection limit is adjusted for dilution.
- i The MRL/MDL or LOQ/LOD is elevated due to a chromatographic interference.
- X See case narrative.
- Q See case narrative. One or more quality control criteria was outside the limits.

Additional Petroleum Hydrocarbon Specific Qualifiers

- ${f F}$ The chromatographic fingerprint of the sample matches the elution pattern of the calibration standard.
- L The chromatographic fingerprint of the sample resembles a petroleum product, but the elution pattern indicates the presence of a greater amount of lighter molecular weight constituents than the calibration standard.
- H The chromatographic fingerprint of the sample resembles a petroleum product, but the elution pattern indicates the presence of a greater amount of heavier molecular weight constituents than the calibration standard.
- O The chromatographic fingerprint of the sample resembles an oil, but does not match the calibration standard.
- Y The chromatographic fingerprint of the sample resembles a petroleum product eluting in approximately the correct carbon range, but the elution pattern does not match the calibration standard.
- Z The chromatographic fingerprint does not resemble a petroleum product.

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ALS Group USA Corp. dba ALS Environmental (ALS) - Kelso State Certifications, Accreditations, and Licenses

Web Site	Number
http://dec.alaska.gov/eh/lab/cs/csapproval.htm	UST-040
http://www.azdhs.gov/lab/license/env.htm	AZ0339
http://www.adeq.state.ar.us/techsvs/labcert.htm	88-0637
http://www.cdph.ca.gov/certlic/labs/Pages/ELAP.aspx	2795
http://www.denix.osd.mil/edqw/Accreditation/AccreditedLabs.cfm	L16-58-R4
http://www.doh.state.fl.us/lab/EnvLabCert/WaterCert.htm	E87412
http://health.hawaii.gov/	-
http://www.pjlabs.com/	L16-57
http://www.deq.louisiana.gov/page/la-lab-accreditation	03016
http://www.maine.gov/dhhs/	WA01276
http://www.health.state.mn.us/accreditation	053-999-457
http://ndep.nv.gov/bsdw/labservice.htm	WA01276
http://www.nj.gov/dep/enforcement/oqa.html	WA005
https://www.wadsworth.org/regulatory/elap	12060
https://deq.nc.gov/about/divisions/water-resources/water-resources- data/water-sciences-home-page/laboratory-certification-branch/non-field-lab- certification	605
http://www.deq.state.ok.us/CSDnew/labcert.htm	9801
http://public.health.oregon.gov/LaboratoryServices/EnvironmentalLaborator yAccreditation/Pages/index.aspx	WA100010
http://www.scdhec.gov/environment/EnvironmentalLabCertification/	61002
http://www.tceq.texas.gov/field/qa/env_lab_accreditation.html	T104704427
http://www.ecy.wa.gov/programs/eap/labs/lab-accreditation.html	C544
https://www.epa.gov/region8-waterops/epa-region-8-certified-drinking-water	-
www.alsglobal.com	NA
	Web Site http://dec.alaska.gov/eh/lab/cs/csapproval.htm http://www.azdhs.gov/lab/license/env.htm http://www.azdhs.gov/lab/license/env.htm http://www.adeq.state.ar.us/techsvs/labcert.htm http://www.deq.state.ar.us/techsvs/labcert.htm http://www.denix.osd.mil/edqw/Accreditation/AccreditedLabs.cfm http://www.denix.osd.mil/edqw/Accreditation/AccreditedLabs.cfm http://www.doh.state.fl.us/lab/EnvLabCert/WaterCert.htm http://health.hawaii.gov/ http://www.pilabs.com/ http://www.maine.gov/dhs/ http://www.maine.gov/dhs/ http://www.health.state.mn.us/accreditation http://www.health.state.mn.us/accreditation http://www.nj.gov/bsdw/labservice.htm http://www.nj.gov/dep/enforcement/oqa.html http://www.nj.gov/dep/enforcement/oqa.html http://www.adsworth.org/regulatory/elap http://www.adsworth.org/regulatory/elap http://www.ads_state.ok.us/CSDnew/labcert.htm http://www.deq.state.ok.us/CSDnew/labcert.htm http://www.deq.state.ok.us/CSDnew/labcert.htm http://www.scdhec.gov/environment/EnvironmentalLabCertification/ http://www.scdhec.gov/environment/EnvironmentalLabCertification/ http://www.scdhec.gov/programs/eap/labs/lab-acc

Analyses were performed according to our laboratory's NELAP-approved quality assurance program. A complete listing of specific NELAP-certified analytes, can be found in the certification section at www.ALSGlobal.com or at the accreditation bodies web site.

Please refer to the certification and/or accreditation body's web site if samples are submitted for compliance purposes. The states highlighted above, require the analysis be listed on the state certification if used for compliance purposes and if the method/anlayte is offered by that state.

Acronyms

ASTM	American Society for Testing and Materials
A2LA	American Association for Laboratory Accreditation
CARB	California Air Resources Board
CAS Number	Chemical Abstract Service registry Number
CFC	Chlorofluorocarbon
CFU	Colony-Forming Unit
DEC	Department of Environmental Conservation
DEQ	Department of Environmental Quality
DHS	Department of Health Services
DOE	Department of Ecology
DOH	Department of Health
EPA	U. S. Environmental Protection Agency
ELAP	Environmental Laboratory Accreditation Program
GC	Gas Chromatography
GC/MS	Gas Chromatography/Mass Spectrometry
LOD	Limit of Detection
LOQ	Limit of Quantitation
LUFT	Leaking Underground Fuel Tank
M MCL	Modified Maximum Contaminant Level is the highest permissible concentration of a substance allowed in drinking water as established by the USEPA.
MDL	Method Detection Limit
MPN	Most Probable Number
MRL	Method Reporting Limit
NA	Not Applicable
NC	Not Calculated
NCASI	National Council of the Paper Industry for Air and Stream Improvement
ND	Not Detected
NIOSH	National Institute for Occupational Safety and Health
PQL	Practical Quantitation Limit
RCRA	Resource Conservation and Recovery Act
SIM	Selected Ion Monitoring
TPH tr	Total Petroleum Hydrocarbons Trace level is the concentration of an analyte that is less than the PQL but greater than or equal to the MDL.

Analyst Summary report

Client:Anchor QEA, LLCProject:Carson Cleaners Facility/200544-01.01

Service Request: K2010780

 Sample Name:
 CC-MW-01-20201118
 Date Collected: 11/18/20

 Lab Code:
 K2010780-001
 Date Received: 11/19/20

 Sample Matrix:
 Ground Water
 Date Received: 11/19/20

Analysis Method 8260C NWTPH-Dx NWTPH-Gx		Extracted/Digested By WVANDERHOFF	Analyzed By JJAMES TPOTTSCHMIDT GGARBAI
Sample Name: Lab Code: Sample Matrix:	CC-MW-01-20201118 K2010780-001.R01 Ground Water		Date Collected: 11/18/20 Date Received: 11/19/20
Analysis Method 8260C		Extracted/Digested By	Analyzed By JJAMES
Sample Name: Lab Code: Sample Matrix:	CC-MW-1001-20201118 K2010780-002 Ground Water		Date Collected: 11/18/20 Date Received: 11/19/20
Analysis Method		Extracted/Digested By	Analyzed By

8260C NWTPH-Dx NWTPH-Gx

Sample Name:

Sample Matrix:

Lab Code:

CC-MW-1001-20201118

K2010780-002.R01

Ground Water

WVANDERHOFF

Analyzed By JJAMES TPOTTSCHMIDT GGARBAI

Date Collected: 11/18/20 **Date Received:** 11/19/20

Analysis MethodExtracted/Digested ByAnalyzed By8260CJJAMES

Analyst Summary report

Client:Anchor QEA, LLCProject:Carson Cleaners Facility/200544-01.01

Service Request: K2010780

Sample Name:CC-TB-20201118Lab Code:K2010780-003Sample Matrix:Water

Date Collected: 11/18/20 **Date Received:** 11/19/20

Analysis Method 8260C NWTPH-Gx Extracted/Digested By

Analyzed By JJAMES GGARBAI



Sample Results

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Volatile Organic Compounds by GC/MS

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Analytical Report **Client:** Service Request: K2010780 Anchor QEA, LLC Date Collected: 11/18/20 10:55 **Project:** Carson Cleaners Facility/200544-01.01 Sample Matrix: Ground Water Date Received: 11/19/20 10:30 Sample Name: CC-MW-01-20201118 Units: ug/L Lab Code: K2010780-001 Basis: NA

Volatile Organic Compounds by GC/MS

Analysis Method:	8260C
Prep Method:	None

Analyte Name	Result	MRL	Dil.	Date Analyzed	Q
Tetrachloroethene (PCE)	2700	50	100	11/24/20 20:17	
Trichloroethene (TCE)	140	5.0	10	11/24/20 19:50	
Vinyl Chloride	ND U	5.0	10	11/24/20 19:50	
cis-1,2-Dichloroethene	63	5.0	10	11/24/20 19:50	
trans-1,2-Dichloroethene	ND U	5.0	10	11/24/20 19:50	

Surrogate Name	% Rec	Control Limits	Date Analyzed	Q
4-Bromofluorobenzene	94	68 - 117	11/24/20 19:50	
Dibromofluoromethane	92	73 - 122	11/24/20 19:50	
Toluene-d8	94	65 - 144	11/24/20 19:50	

Analytical Report

Client:	Anchor QEA, LLC	Service Request:	K2010780
Project:	Carson Cleaners Facility/200544-01.01	Date Collected:	11/18/20 11:00
Sample Matrix:	Ground Water	Date Received:	11/19/20 10:30
Sample Name:	CC-MW-1001-20201118	Units:	ug/L
Lab Code:	K2010780-002	Basis:	NA

Volatile Organic Compounds by GC/MS

Analysis Method:	8260C
Prep Method:	None

Analyte Name	Result	MRL	Dil.	Date Analyzed	Q
Tetrachloroethene (PCE)	2600	50	100	11/24/20 21:10	
Trichloroethene (TCE)	140	5.0	10	11/24/20 20:43	
Vinyl Chloride	ND U	5.0	10	11/24/20 20:43	
cis-1,2-Dichloroethene	66	5.0	10	11/24/20 20:43	
trans-1,2-Dichloroethene	ND U	5.0	10	11/24/20 20:43	

Surrogate Name	% Rec	Control Limits	Date Analyzed	Q
4-Bromofluorobenzene	94	68 - 117	11/24/20 20:43	
Dibromofluoromethane	101	73 - 122	11/24/20 20:43	
Toluene-d8	99	65 - 144	11/24/20 20:43	

Analytical Report **Client:** Service Request: K2010780 Anchor QEA, LLC Date Collected: 11/18/20 10:00 **Project:** Carson Cleaners Facility/200544-01.01 Sample Matrix: Water Date Received: 11/19/20 10:30 Sample Name: CC-TB-20201118 Units: ug/L Lab Code: K2010780-003 Basis: NA

Volatile Organic Compounds by GC/MS

Analysis Method:	8260C
Prep Method:	None

Analyte Name	Result	MRL	Dil.	Date Analyzed	Q
Tetrachloroethene (PCE)	ND U	0.50	1	11/24/20 19:24	
Trichloroethene (TCE)	ND U	0.50	1	11/24/20 19:24	
Vinyl Chloride	ND U	0.50	1	11/24/20 19:24	
cis-1,2-Dichloroethene	ND U	0.50	1	11/24/20 19:24	
trans-1,2-Dichloroethene	ND U	0.50	1	11/24/20 19:24	

Surrogate Name	% Rec	Control Limits	Date Analyzed	Q
4-Bromofluorobenzene	90	68 - 117	11/24/20 19:24	
Dibromofluoromethane	99	73 - 122	11/24/20 19:24	
Toluene-d8	99	65 - 144	11/24/20 19:24	

		Analytica	Report			
Client:	Anchor QEA, LLC			Service	Request: K2010780	
Project:	Carson Cleaners Facility	y/200544-01.01		Date C	Collected: 11/18/20 10:	55
Sample Matrix:	Ground Water			Date I	Received: 11/19/20 10:3	30
Sample Name:	CC-MW-01-20201118				Units: ug/L	
Lab Code:	K2010780-001				Basis: NA	
		Volatile Petroleum P	roducts by GC/FID			
Analysis Method:	NWTPH-Gx					
Prep Method:	None					
Analyte Name		Result	MRL	Dil.	Date Analyzed	Q
Gasoline Range Orga Naphthalene GRO)	anics (Toluene-	2020	250	1	11/24/20 03:36	
Surrogate Name		%]	Rec Control Lim	its Date	e Analyzed Q	

93

50 - 150

11/24/20 03:36

Printed 12/7/2020 9:09:54 AM

1,4-Difluorobenzene

		Ana	lytical Report				
Client:	Anchor QEA, LLC				Service	Request: K2010780	
Project:	Carson Cleaners Facility/20	0544-01.01			Date (Collected: 11/18/20 11:	.00
Sample Matrix:	Ground Water				Date 1	Received: 11/19/20 10:	.30
Sample Name:	CC-MW-1001-20201118					Units: ug/L	
Lab Code:	K2010780-002					Basis: NA	
		Volatile Petrole	um Product	s by GC/FID			
Analysis Method:	NWTPH-Gx						
Prep Method:	None						
Analyte Name		Result		MRL	Dil.	Date Analyzed	Q
Gasoline Range Orga Naphthalene GRO)	anics (Toluene-	2050		250	1	11/24/20 04:00	
Surrogate Name			% Rec	Control Limits	Dat	e Analyzed Q	
1,4-Difluorobenzene			92	50 - 150	11/2	24/20 04:00	

		Analytical Repo	ort			
Client:	Anchor QEA, LLC			Service	Request: K2010780	
Project:	Carson Cleaners Facili	ty/200544-01.01		Date (Collected: 11/18/20 10:	00
Sample Matrix:	Water			Date 1	Received: 11/19/20 10:	30
Sample Name:	CC-TB-20201118				Units: ug/L	
Lab Code:	K2010780-003				Basis: NA	
		Volatile Petroleum Produ	cts by GC/FID			
Analysis Method:	NWTPH-Gx					
Prep Method:	None					
Analyte Name		Result	MRL	Dil.	Date Analyzed	Q
Gasoline Range Orga Naphthalene GRO)	anics (Toluene-	ND U	250	1	11/24/20 01:15	
Surrogate Name		% Rec	Control Lin	nits Date	e Analvzed 🛛 Q	

88

50 - 150

11/24/20 01:15

1,4-Difluorobenzene



Semivolatile Organic Compounds by GC

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Analytical Report

Client:	Anchor QEA, LLC	Service Request:	K2010780
Project:	Carson Cleaners Facility/200544-01.01	Date Collected:	11/18/20 10:55
Sample Matrix:	Ground Water	Date Received:	11/19/20 10:30
Sample Name:	CC-MW-01-20201118	Units:	ug/L
Lab Code:	K2010780-001	Basis:	NA
Sample Matrix: Sample Name: Lab Code:	CC-MW-01-20201118 K2010780-001	Date Received: Units: Basis:	ug/L NA

Semi-Volatile Petroleum Products by GC/FID

Analysis Method:	NWTPH-Dx
Prep Method:	EPA 3510C

Analyte Name	Result	MRL	Dil.	Date Analyzed	Date Extracted	Q
Diesel Range Organics (C12 - C25 DRO) Residual Range Organics (C25 - C36 RPO)	ND U	250 500	1	12/01/20 01:46	11/20/20	
Residual Range Organics (C23 - C30 KRO)		500	1	12/01/20 01.40	11/20/20	

Surrogate Name	% Rec	Control Limits	Date Analyzed	Q
o-Terphenyl	89	50 - 150	12/01/20 01:46	
n-Triacontane	102	50 - 150	12/01/20 01:46	
Analytical Report

Client:	Anchor QEA, LLC	Service Request: K2	010780
Project:	Carson Cleaners Facility/200544-01.01	Date Collected: 11/	/18/20 11:00
Sample Matrix:	Ground Water	Date Received: 11/	/19/20 10:30
Sample Name:	CC-MW-1001-20201118	Units: ug/	/L
Lab Code:	K2010780-002	Basis: NA	A

Semi-Volatile Petroleum Products by GC/FID

Analysis Method:	NWTPH-Dx		
Prep Method:	EPA 3510C		

Analyte Name	Result	MRL	Dil.	Date Analyzed	Date Extracted	Q
Diesel Range Organics (C12 - C25 DRO)	ND U	250	1	12/01/20 02:07	11/20/20	
Residual Range Organics (C25 - C36 RRO)	ND U	500	1	12/01/20 02:07	11/20/20	

Surrogate Name	% Rec	Control Limits	Date Analyzed	Q
o-Terphenyl	91	50 - 150	12/01/20 02:07	
n-Triacontane	105	50 - 150	12/01/20 02:07	



QC Summary Forms

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Volatile Organic Compounds by GC/MS

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QA/QC Report

Client:Anchor QEA, LLCProject:Carson Cleaners Facility/200544-01.01Sample Matrix:Ground Water

Service Request: K2010780

SURROGATE RECOVERY SUMMARY

Volatile Organic Compounds by GC/MS

Analysis Method:	8260C
Extraction Method:	None

		4-Bromofluorobenzene	Dibromofluoromethane	Toluene-d8
Sample Name	Lab Code	68-117	73-122	65-144
CC-MW-01-20201118	K2010780-001	94	92	94
CC-MW-1001-20201118	K2010780-002	94	101	99
Method Blank	KQ2018881-05	94	98	100
Lab Control Sample	KQ2018881-03	91	99	98
Duplicate Lab Control Sample	KQ2018881-04	96	103	102

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QA/QC Report

Client:Anchor QEA, LLCProject:Carson Cleaners Facility/200544-01.01Sample Matrix:Water

Service Request: K2010780

SURROGATE RECOVERY SUMMARY

Volatile Organic Compounds by GC/MS

Analysis Method:	8260C
Extraction Method:	None

		4-Bromofluorobenzene Dibromofluoromethane		Toluene-d8
Sample Name	Lab Code	68-117	73-122	65-144
CC-TB-20201118	K2010780-003	90	99	99

Analytical Report **Client:** Service Request: K2010780 Anchor QEA, LLC **Project:** Carson Cleaners Facility/200544-01.01 Date Collected: NA Sample Matrix: Ground Water Date Received: NA Sample Name: Method Blank Units: ug/L Lab Code: KQ2018881-05 Basis: NA

Volatile Organic Compounds by GC/MS

Analysis Method:	8260C
Prep Method:	None

Analyte Name	Result	MRL	Dil.	Date Analyzed	Q
Tetrachloroethene (PCE)	ND U	0.50	1	11/24/20 13:39	
Trichloroethene (TCE)	ND U	0.50	1	11/24/20 13:39	
Vinyl Chloride	ND U	0.50	1	11/24/20 13:39	
cis-1,2-Dichloroethene	ND U	0.50	1	11/24/20 13:39	
trans-1,2-Dichloroethene	ND U	0.50	1	11/24/20 13:39	

Surrogate Name	% Rec	Control Limits	Date Analyzed	Q
4-Bromofluorobenzene	94	68 - 117	11/24/20 13:39	
Dibromofluoromethane	98	73 - 122	11/24/20 13:39	
Toluene-d8	100	65 - 144	11/24/20 13:39	

QA/QC Report

Client:	Anchor	QEA, LL	.C			:	Service Ree	quest:	K2010780)
Project:	Carson	Cleaners	Facility/200544-0	1.01]	Date Analy	zed:	11/24/20	
Sample Matrix:	Ground	Water]	Date Extra	cted:	NA	
			Duplicat	e Lab Co	ntrol Samp	ole Summary				
Volatile Organic Compounds by GC/MS										
Analysis Method:	8260C					1	Units:		ug/L	
Prep Method:	None]	Basis:		NA	
							Analysis Lo	ot:	704820	
		La	b Control Sampl	le	D	uplicate Lab Co	ontrol Sam	ple		
			KQ2018881-03			KQ2018881-04				
								% Rec		
Analyte Name		Result	Spike Amount	% Rec	Result	Spike Amount	k % Rec	Limits	RPD	RPD Limit
cis-1,2-Dichloroethene	e	9.90	10.0	99	10.3	10.0	103	71-118	4	30
Tetrachloroethene (PC	E)	10.2	10.0	102	10.5	10.0	105	62-126	3	30
trans-1,2-Dichloroethe	ene	9.59	10.0	96	9.76	10.0	98	67-125	2	30
Trichloroethene (TCE))	10.4	10.0	104	10.6	10.0	106	67-128	2	30
Vinyl Chloride		9.24	10.0	92	10.0	10.0	100	55-123	8	30

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QA/QC Report

Client:Anchor QEA, LLCProject:Carson Cleaners Facility/200544-01.01Sample Matrix:Ground Water

SURROGATE RECOVERY SUMMARY

Volatile Petroleum Products by GC/FID

Analysis Method:	NWTPH-Gx
Extraction Method:	None

	1,4-Difluorobenzene			
Sample Name	Lab Code	50-150		
CC-MW-01-20201118	K2010780-001	93		
CC-MW-1001-20201118	K2010780-002	92		
Method Blank	KQ2018876-03	91		
Method Blank	KQ2018876-09	89		
Method Blank	KQ2018876-14	91		
Lab Control Sample	KQ2018876-17	89		
Lab Control Sample	KQ2018876-19	96		
Duplicate Lab Control Sample	KQ2018876-20	95		

Service Request: K2010780

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QA/QC Report

Client:Anchor QEA, LLCProject:Carson Cleaners Facility/200544-01.01Sample Matrix:Water

Service Request: K2010780

SURROGATE RECOVERY SUMMARY

Volatile Petroleum Products by GC/FID

Analysis Method:	NWTPH-Gx
Extraction Method:	None

	1,4-Difluorobenzene		
Sample Name Lab	o Code 50-150		
CC-TB-20201118 K201	010780-003 88		

		Analytical Rep	ort			
Client:	Anchor QEA, LLC			Service	Request: K2010780	
Project:	Carson Cleaners Facility	/200544-01.01		Date (Collected: NA	
Sample Matrix:	Ground Water			Date 1	Received: NA	
Sample Name:	Method Blank				Units: ug/L	
Lab Code:	KQ2018876-03				Basis: NA	
		Volatile Petroleum Produ	icts by GC/FID			
Analysis Method:	NWTPH-Gx					
Prep Method:	None					
Analyte Name		Result	MRL	Dil.	Date Analyzed	Q
Gasoline Range Org Naphthalene GRO)	anics (Toluene-	ND U	250	1	11/23/20 18:10	
Surrogate Name		% Rec	Control Lir	nits Data	Analyzed O	

91

50 - 150

11/23/20 18:10

1,4-Difluorobenzene

		Analytical Rep	ort			
Client:	Anchor QEA, LLC			Service	Request: K2010780	
Project:	Carson Cleaners Facilit	y/200544-01.01		Date (Collected: NA	
Sample Matrix:	Ground Water			Date 1	Received: NA	
Sample Name:	Method Blank				Units: ug/L	
Lab Code:	KQ2018876-09				Basis: NA	
		Volatile Petroleum Produ	icts by GC/FID			
Analysis Method:	NWTPH-Gx					
Prep Method:	None					
Analyte Name		Result	MRL	Dil.	Date Analyzed	Q
Gasoline Range Orga Naphthalene GRO)	anics (Toluene-	ND U	250	1	11/24/20 00:52	
Surrogate Name		% Rec	Control Lin	nits Dat	e Analyzed O	

89

50 - 150

11/24/20 00:52

1,4-Difluorobenzene

		Analytical Rep	ort			
Client:	Anchor QEA, LLC			Service	Request: K2010780	
Project:	Carson Cleaners Facility	/200544-01.01		Date (Collected: NA	
Sample Matrix:	Ground Water			Date 1	Received: NA	
Sample Name:	Method Blank				Units: ug/L	
Lab Code:	KQ2018876-14				Basis: NA	
		Volatile Petroleum Produ	icts by GC/FID			
Analysis Method:	NWTPH-Gx					
Prep Method:	None					
Analyte Name		Result	MRL	Dil.	Date Analyzed	Q
Gasoline Range Org Naphthalene GRO)	anics (Toluene-	ND U	250	1	11/24/20 10:41	
Surrogate Name		% Rec	Control Lir	nits Date	Analyzed O	

91

50 - 150

1,4-Difluorobenzene

11/24/20 10:41

QA/QC Report

Client:	Anchor QEA, LLC		S	ervice Request:	K2010780
Project:	Carson Cleaners Facility/2	00544-01.01	Γ	Date Analyzed:	11/24/20
Sample Matrix:	Ground Water		Γ	Date Extracted:	NA
		Lab Control Sampl	e Summary		
	•	Volatile Petroleum Prod	lucts by GC/FID		
Analysis Method:	NWTPH-Gx		τ	Jnits:	ug/L
Prep Method:	None		E	Basis:	NA
			A	Analysis Lot:	704350
			Lab Control Sample		
			KQ2018876-17		
Analyte Name		Result	Spike Amount	% Rec	% Rec Limits
Gasoline Range Organ	ics (Toluene-Naphthalene	418	500	84	80-119
GRO)					

QA/QC Report

Client:	Anchor QEA, LI	LC				Serv	ice Reque	st: K2	010780	
Project:	Carson Cleaners	Facility/200	544-01.01			Date	Analyzed	: 11	/23/20	
Sample Matrix:	Ground Water					Date	Extracted	l: NA	A	
		Du	plicate Lab (Control Sa	mple Sum	mary				
		Vo	latile Petrolo	eum Produ	icts by GC	/FID				
Analysis Method:	NWTPH-Gx					Unit	5:	ug	/L	
Prep Method:	None					Basis	5:	NA	A	
						Anal	ysis Lot:	70	4350	
		Lab	Control San	nple	Dup	licate Lab C	ontrol San	nple		
		K	Q2018876-1	9		KQ20188	876-20			
			Spike			Spike		% Rec		RPD
Analyte Name		Result	Amount	% Rec	Result	Amount	% Rec	Limits	RPD	Limit
Gasoline Range Organ Naphthalene GRO)	ics (Toluene-	449	500	90	440	500	88	80-119	2	30



Semivolatile Organic Compounds by GC

ALS Environmental—Kelso Laboratory 1317 South 13th Avenue, Kelso, WA 98626 Phone (360) 577-7222 Fax (360) 425-9096 www.alsglobal.com

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QA/QC Report

Service Request: K2010780

Client:Anchor QEA, LLCProject:Carson Cleaners Facility/200544-01.01Sample Matrix:Ground Water

SURROGATE RECOVERY SUMMARY

Semi-Volatile Petroleum Products by GC/FID

Analysis Method:	NWTPH-Dx
Extraction Method:	EPA 3510C

		o-Terphenyl	n-Triacontane	
Sample Name	Lab Code	50-150	50-150	
CC-MW-01-20201118	K2010780-001	89	102	
CC-MW-1001-20201118	K2010780-002	91	105	
Method Blank	KQ2018393-04	93	106	
Lab Control Sample	KQ2018393-03	91	99	

Analytical Report **Client:** Service Request: K2010780 Anchor QEA, LLC **Project:** Carson Cleaners Facility/200544-01.01 Date Collected: NA Sample Matrix: Ground Water Date Received: NA Sample Name: Method Blank Units: ug/L Lab Code: KQ2018393-04 Basis: NA

Semi-Volatile Petroleum Products by GC/FID

Analysis Method:	NWTPH-Dx
Prep Method:	EPA 3510C

Analyte Name	Result	MRL	Dil.	Date Analyzed	Date Extracted	Q
Diesel Range Organics (C12 - C25 DRO)	ND U	250	1	11/30/20 17:55	11/20/20	
Residual Range Organics (C25 - C36 RRO)	ND U	500	1	11/30/20 17:55	11/20/20	

Surrogate Name	% Rec	Control Limits	Date Analyzed	Q
o-Terphenyl	93	50 - 150	11/30/20 17:55	
n-Triacontane	106	50 - 150	11/30/20 17:55	

QA/QC Report

Client:	Anchor QEA, LLC			Service Request:	K2010780
Project:	Carson Cleaners Facili	ty/200544-01.01		Date Analyzed:	11/30/20
Sample Matrix:	Ground Water			Date Extracted:	11/20/20
		Lab Control Samp	ole Summary		
		Semi-Volatile Petroleum l	Products by GC/FID		
Analysis Method:	NWTPH-Dx			Units:	ug/L
Prep Method:	EPA 3510C			Basis:	NA
				Analysis Lot:	705277
			Lab Control Sampl	le	
			KQ2018393-03		
Analyte Name		Result	Spike Amount	% Rec	% Rec Limits
Diesel Range Organics	s (C12 - C25 DRO)	3070	3200	96	46-140
Residual Range Organ	ics (C25 - C36 RRO)	1530	1600	96	45-159

Appendix F Data Validation Reports



Data Validation Report – EPA Stage 2A

September 15, 2020

Project:Carson Cleaners Vapors Intrusion EvaluationProject Number:200544-01.01

This report summarizes the review of analytical results for eleven air samples collected on July 23 and 24, 2020. The samples were collected by Anchor QEA, LLC, and submitted to ALS Environmental (ALS) in Simi Valley, California. The samples were analyzed for the following parameters:

 Volatile organic compounds (VOCs) by U.S. Environmental Protection Agency (EPA) method TO-15

ALS sample data group (SDG) number P2004153 were reviewed in this report. Sample IDs, matrices, and analyses are presented in Table 1.

Table 1 Sample IDs, Matrices, and Analyses

Sample ID	Lab Sample ID	Matrix	Analysis
CC-SS-01-072320	P2004153-001	Air	VOCs
CC-IA-01-072320	P2004153-002	Air	VOCs
CC-SG-01-072420	P2004153-003	Air	VOCs
CC-SS-02-072320	P2004153-004	Air	VOCs
CC-IA-02-072320	P2004153-005	Air	VOCs
CC-SS-03-072320	P2004153-006	Air	VOCs
CC-IA-03-072320	P2004153-007	Air	VOCs
CC-SG-03-072420	P2004153-008	Air	VOCs
CC-IA-04-072320	P2004153-009	Air	VOCs
CC-SG-04-072420	P2004153-010	Air	VOCs
CC-AA-00-072420	P2004153-011	Air	VOCs

Data Validation and Qualifications

The following comments refer to the laboratory's performance in meeting the quality assurance/quality control guidelines outlined in the analytical procedures. Laboratory results were reviewed using the laboratory control limits and the following guidelines:

• USEPA National Functional Guidelines for Superfund Organic Methods Data Review (USEPA 2017a)

Unless noted in this report, laboratory results for the samples listed in Table 1 were within quality control criteria.

Field Documentation

Field documentation was checked for completeness and accuracy. The chain-of-custody forms were signed by ALS at the time of sample receipt.

Holding Times and Sample Preservation

Samples were appropriately preserved and analyzed within holding time.

Laboratory Method Blanks

Laboratory method blanks were analyzed at the required frequencies. All method blanks were free of target analytes.

Field Quality Control

No field quality control samples were required to be collected with these samples sets.

Laboratory Control Samples and Laboratory Control Sample Duplicates

Laboratory control samples (LCSs) were analyzed at the required frequencies. All analyses resulted in recovery values within laboratory control limits. No laboratory control sample duplicates (LCSDs) were analyzed with these sample sets.

Matrix Spike and Matrix Spike Duplicate Samples

LCS were analyzed in place of Matrix spike (MS). Recoveries were within laboratory control limits. No matrix spike duplicate samples (MSDs) were analyzed with these sample sets.

Laboratory Duplicates

Laboratory duplicates were not analyzed with these sample sets.

Method Reporting Limits

Reporting limits were acceptable as reported. Values were reported as undiluted, or when reported as diluted, the reporting limit accurately reflects the dilution factor.

Overall Assessment

As was determined by this evaluation, the laboratory followed the specified analytical methods, and all requested sample analyses were completed. Accuracy was acceptable as demonstrated by the laboratory control sample recovery values. Precision could not be determined for this data. All data are acceptable as reported.

References

USEPA. 2017a. National Functional Guidelines for Superfund Organic Methods Data Review. Office of Superfund Remediation and Technology Innovation. United States Environmental Protection Agency. EPA-540-R-2017-001. January 2017.



Data Validation Report – EPA Stage 2A

October 6, 2020

Project: Carson Cleaners Vapors Intrusion Evaluation

Project Number: 200544-01.01

This report summarizes the review of analytical results for 5 soil samples, one water sample, and two trip blanks collected on July 24 and August 14, 2020. The samples were collected by Anchor QEA, LLC, and submitted to ALS Environmental (ALS) in Kelso, Washington. The samples were analyzed for the following parameters:

- Volatile organic compounds (VOCs) by U.S. Environmental Protection Agency (USEPA) method 8260C
- Gasoline range organics (GRO) by Northwest Total Petroleum Hydrocarbons Gasoline Range Extended (NWTPHGx)
- Diesel range organics (DRO) by Northwest Total Petroleum Hydrocarbons Diesel Range Extended (NWTPHDx)
- Total solids (TS) by USEPA Method 160.3 modified

ALS sample data groups (SDGs) K2006350, K2007073, and K2007075 were reviewed in this report. Sample IDs, matrices, and analyses are presented in Table 1.

Table 1 Sample IDs, Matrices, and Analyses

Sample ID	Lab Sample ID	Matrix	Analyses
CC-MW-01-14.5-072420	K2006350-001	Soil	DRO, GRO, VOCs, TS
CC-MW-01-18-072420	K2006350-002	Soil	DRO, GRO, VOCs, TS
CC-MW-01-24-072420	K2006350-003	Soil	DRO, GRO, VOCs, TS
CC-MW-01-124-072420	K2006350-004	Soil	DRO, GRO, VOCs, TS
CC-MW-01-29-072420	K2006350-005	Soil	DRO, GRO, VOCs, TS
TB-01-072420	K2006350-006	Water	GRO, VOCs
CC-MW-01-20200814	K2007075-001	Water	DRO
	K2007073-002		GRO, VOCs
CC-TB-20200814	K2007073-001	Water	VOCs
	K2007073-003	-	GRO
	12007070 000		0.10

Data Validation and Qualifications

The following comments refer to the laboratory's performance in meeting the quality assurance/quality control guidelines outlined in the analytical procedures. Laboratory results were reviewed using the laboratory control limits and the following guidelines:

- USEPA 1986 (SW-846, Third Edition), Test Methods for Evaluating Solid Waste: Physical/Chemical Methods.
- USEPA National Functional Guidelines for Superfund Organic Methods Data Review (USEPA 2017b)
- USEPA National Functional Guidelines for Inorganic Superfund Data Review (USEPA 2017a)

Unless noted in this report, laboratory results for the samples listed in Table 1 were within quality control criteria.

Field Documentation

Field documentation was checked for completeness and accuracy. The chain-of-custody forms were signed by ALS at the time of sample receipt. Samples were received in good condition and within the recommended temperature range.

Holding Times and Sample Preservation and Analytical Methods

Samples were appropriately preserved and analyzed within the recommended holding times, with the exception of CC-TB-20200814, which was analyzed for tetrachloroethene and trichloroethene three days outside the recommended fourteen-day hold time. Due to label discrepancies and laboratory error, results for these analytes were rejected, as discussed in the sections below.

See Table 3 for a summary of qualified results.

Laboratory Method Blanks

Laboratory method blanks were analyzed at the required frequencies. All method blanks were free of target analytes.

Field Quality Control

Trip Blanks

Two trip blank samples were collected and analyzed in association with these samples sets. The trip blank associated with the soil samples was free of target analytes. The trip blank associated with the water samples, CC-TB-20200814, had high detections of tetrachloroethene and trichloroethene. Due to sample label discrepancies and laboratory error, it could not be determined if sample CC-TB-20200814 was analyzed for VOCs and GRO from trip blank vials or a sample vials; therefore VOC and GRO results were rejected.

See Table 3 for a summary of qualified results.

Field Duplicates

One soil field duplicate sample was collected in association with this sample set. Detected results are summarized in Table 2.

Table 2 Field Duplicate Summary

Analyte	CC-MW-01- 24-072420	CC-MW-01- 124-072420	RPD	Difference	Control Limit
Tetrachloroethene (PCE)	3.1 mg/kg	4.2 mg/kg	30%		
Total Solids	82.1%	82.5%	0%		
Trichloroethene (TCE)	6.4U ug/kg	6.3 ug/kg		0.100ug/kg	12.8 ug/kg

Notes: mg/kg: milligrams per kilogram

 μ g/kg: micrograms per kilogram

Results were evaluated using a control limit of less than or equal to 30% relative percent difference (RPD) value. Parent and duplicate sample results that were less than five times the reporting limit (RL) may have exaggerated RPDs, so these results were assessed by the difference between them using the two times ± the parent RL as the control limit. All duplicate RPD and/or difference values were within control limits

Surrogate Recoveries

Surrogate recoveries were within the laboratory control limits listed.

Laboratory Control Samples and Laboratory Control Duplicate Samples

Laboratory control samples (LCSs) and laboratory control sample duplicates (LCSDs) were analyzed at the required frequencies. All LCS/LCSD recoveries and/or RPD values were within laboratory control limits.

Matrix Spike and Matrix Spike Duplicate Samples

Matrix spike (MS) and matrix spike duplicate (MSD) samples were not required to be analyzed for these

Laboratory Duplicates

Laboratory duplicates were analyzed at the required frequency and RPDs were within laboratory control limits.

Reporting Limits

RLs were acceptable as reported. Values were reported as undiluted, or when diluted, the RL reflects the dilution factor.

Overall Assessment

As was determined by this evaluation, the laboratory followed the specified analytical methods and all requested sample analyses were completed. Accuracy was acceptable as demonstrated by the surrogate, LCS/LCSD, and MS/MSD recovery values. Precision was acceptable as demonstrated by the LCS/LCSD, MS/MSD, laboratory, and field duplicate RPD values or difference values. Most data are acceptable as reported. Five VOC results and one GRO result for sample CC-TB-200814 (trip blank) were rejected. Data are not expected to be impacted since method QC were within laboratory control limits.

See Table 3 for a summary of qualified results.

Data Qualifier Definitions

R Data is rejected and unusable.

Table 3Data Qualification Summary

Sample ID	Parameter	Analyte	Reported Result	Qualified Result	Reason
CC-TB- 20200814		1,2-Dichloroethene, cis-	40 ug/L		
		1,2-Dichloroethene, trans-	0.5U ug/L		
	VOCs	Vinyl chloride	0.5U ug/L	R	Sample label discrepancies
		Tetrachloroethene (PCE)	2100 ug/L		
		Trichloroethene (TCE)	110 ug/L		
	GRO	Gasoline range hydrocarbons	250U ug/L	R	Sample label discrepancies

References

- USEPA. 1986. Test methods for Evaluating Solid Waste: Physical/Chemical Methods. U.S. Environmental Protection Agency, Office of Solid Waste and Emergency Response. EPA-530/SW-846.
- USEPA. 2016a. National Functional Guidelines for Superfund Organic Methods Data Review. Office of Superfund Remediation and Technology Innovation. United States Environmental Protection Agency. EPA-540-R-2017-002. January 2017.
- USEPA 2016b. National Functional Guidelines for Inorganic Superfund Data Review. Office of Superfund Remediation and Technology Innovation. United States Environmental Protection Agency. EPA-540-R-2017-001. January 2017.



Data Validation Report – EPA Stage 2A

January 27, 2021

Project:Carson Cleaners Vapors Intrusion EvaluationProject Number:202280-01.01

This report summarizes the review of analytical results for one water sample, one duplicate, and one trip blank collected on November 18, 2020. The samples were collected by Anchor QEA, LLC, and submitted to ALS Environmental (ALS) in Kelso, Washington. The samples were analyzed for the following parameters:

- Volatile organic compounds (VOCs) by U.S. Environmental Protection Agency (USEPA) method 8260C
- Gasoline range organics (GRO) by Northwest Total Petroleum Hydrocarbons Gasoline Range Extended (NWTPHGx)
- Diesel range organics (DRO) by Northwest Total Petroleum Hydrocarbons Diesel Range Extended (NWTPHDx)

ALS sample data group (SDG) K2010780 was reviewed in this report. Sample IDs, matrix, and analyses are presented in Table 1.

Table 1 Sample IDs, Matrix, and Analyses

Sample ID	Lab Sample ID	Matrix	Analyses
CC-MW-01-20201118	K2010780-001	Water	DRO, GRO, VOCs
CC-MW-1001-20201118	K2010780-002	Water	DRO, GRO, VOCs
CC-TB-20201118	K2010780-003	Water	GRO, VOCs

Data Validation and Qualifications

The following comments refer to the laboratory's performance in meeting the quality assurance/quality control guidelines outlined in the analytical procedures. Laboratory results were reviewed using the laboratory control limits and the USEPA National Functional Guidelines for Superfund Organic Methods Data Review (USEPA 2017).

Unless noted in this report, laboratory results for the samples listed in Table 1 were within quality control criteria.

Field Documentation

Field documentation was checked for completeness and accuracy. The chain-of-custody form was signed by ALS at the time of sample receipt. Samples were received in good condition and within the recommended temperature range.

Holding Times and Sample Preservation

Samples were appropriately preserved and analyzed within the recommended holding times.

Laboratory Method Blanks

Laboratory method blanks were analyzed at the required frequencies. All method blanks were free of target analytes.

Field Quality Control

Field Duplicate

One field duplicate was collected with this sample set. Results were evaluated using a control limit of less than or equal to 50% relative percent difference (RPD). All RPD values were within control limits.

Analyte	CC-MW-01-20201118	CC-MW-1001-20201118	RPD
Gasoline range hydrocarbons	2020 µg/L	2050 μg/L	1.5%
1,2-Dichloroethene, cis-	63 µg/L	66 µg/L	4.7%
Trichloroethene (TCE)	140 µg/L	140 µg/L	0%
Tetrachloroethene (PCE)	2700 μg/L	2600 µg/L	3.8%

Trip Blanks

One trip blank sample was collected and analyzed in association with this sample set and was free of target analytes.

Surrogate Recoveries

Surrogate recoveries were within the laboratory control limits listed.

Laboratory Control Samples and Laboratory Control Duplicate Samples

Laboratory control samples (LCSs) and laboratory control sample duplicates (LCSDs) were analyzed at the required frequencies. All LCS/LCSD recoveries and/or RPD values were within laboratory control limits.

Matrix Spike and Matrix Spike Duplicate Samples

LCS and LCSDs were analyzed in place of matrix spike (MS) and matrix spike duplicate (MSD) samples for the VOC and GRO analyses A LCS was reported in association with the DRO analyses. No MS/MSDs were analyzed with this sample set.

Laboratory Duplicates

Laboratory duplicates were not analyzed with this sample set.

Method Reporting Limits

Reporting limits were acceptable as reported. Values were reported as undiluted, or when reported as diluted, the reporting limit accurately reflects the dilution factor.

Overall Assessment

As was determined by this evaluation, the laboratory followed the specified analytical methods, and all requested sample analyses were completed. Accuracy was acceptable as demonstrated by the LCS/LCSD recovery values. Precision was acceptable as demonstrated by the field duplicate and LCSD RPD values. All data are acceptable as reported.

Reference

USEPA. 2017. National Functional Guidelines for Superfund Organic Methods Data Review. Office of Superfund Remediation and Technology Innovation. United States Environmental Protection Agency. EPA-540-R-2017-001. January 201