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May 9, 2022

Aaren Fiedler, LG Washington State Department of Ecology Toxics Cleanup Program Southwest Regional Office PO Box 47775 Olympia, Washington 98504

RE: RESPONSE TO APRIL 1, 2021 LETTER REGARDING FURTHER ACTION AT THE LAKE TAPPS MINI-MARKET 18215 9th STREET EAST, LAKE TAPPS, WASHINGTON FARALLON PN: 571-001 VCP IDENTIFICATION NO: SW0741

Dear Aaren Fiedler:

Farallon Consulting, L.L.C. (Farallon) has prepared this letter to provide response to comments in the letter dated April 1, 2021 regarding Further Action at the following Site: Lake Tapps Mini Mart from Aaren Fiedler of the Washington State Department of Ecology (Ecology) to Emerald Erickson-Mulanax of Farallon (Opinion Letter) pertaining to the Technical Memorandum regarding Groundwater Monitoring and Sampling and Mini-Market Site Closure Request, Lakes Tapps Mini-Market and Lake Tapps Dry Cleaning Facility, Lake Tapps, Washington dated December 2, 2020¹ (Closure Request Memorandum) submitted to Ecology on behalf of S &V Properties Association LLC for the property at 18215 9th Street East, in Lake Tapps, Washington (herein referred to as the Site) (Figure 1). The Site is enrolled in the Voluntary Cleanup Program (VCP) with assigned VCP Site ID No. SW0741.

Select Ecology comments are presented below in italicized font, followed by Farallon's response in roman font. The term "Site" used in the following sections and defined under the Washington State Model Toxics Control Act Cleanup Regulation (MTCA) refers to the portions of the Site where hazardous substances have come to be located at concentrations exceeding applicable MTCA cleanup levels.

CHARACTERIZATION OF THE SITE

1. ECOLOGY COMMENT

Ecology has determined your characterization of the Site is not sufficient to establish cleanup standards and select a cleanup action. For clarity and to help Ecology understand the nature and extent of the Site, please indicate non-detected results using a '<' (less than symbol) followed by

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¹ From Jeffrey Kaspar and Emerald Erickson-Mulanax of Farallon to Aaren Fiedler of Ecology.



the MDL. Please avoid using only an 'ND' designation. Additionally, please indicate which results fall in the 'estimate' or 'approximate' range.

FARALLON RESPONSE

Farallon can use existing laboratory data to indicate detections at or greater than laboratory reporting/practical quantitation limits (PQLs). The less-than symbol and the PQL will be listed when there is not a detection at or greater than the PQL. However, the method detection limits (MDLs) or the estimated data between an MDL and the PQL cannot be provided.

Farallon spoke with Karl Hornyik, director of Onsite Environmental Inc. (Onsite), the analytical laboratory that has been used for this Site work since 2007, regarding the Ecology request to present MDLs for the analytical methods pertinent to this Site. Farallon's rationale for not reporting to the MDLs based on the conversation with Karl Hornyik, Farallon's experience working with Ecology, and current regulations is as follows:

- Northwest total petroleum hydrocarbon (NWTPH) analytical methods do not specify a requirement to calculate MDLs, and therefore laboratory equipment is not calibrated to achieve detections less than reporting limits. One reason OnSite does not report values less than laboratory reporting limits is that Ecology historically has not had issues with relying on data at or greater than laboratory reporting limits in making decisions regarding defining a Site or providing opinions on cleanup determinations under MTCA.
- Monitoring to levels less than reporting limits yields data that become suspect, and represent estimated values at best. In Farallon's experience with Ecology, the definition of a "Site" under MTCA has been based on data that are not suspect. Therefore, detections at or greater than the laboratory reporting limits are sufficient to define the Site.

Farallon trusts that using existing data that are at or greater than laboratory PQLs meets the requirements under MTCA to define the Site.

2. ECOLOGY COMMENT

Please demonstrate that you have defined the Site for all hazardous substances indicated on MTCA Table 830-1 for gasoline range organics.

FARALLON RESPONSE

Groundwater elevation data are summarized in Table 1. Table 2 provides a summary of natural attenuation and water quality parameters. Table 3 provides a summary of soil total petroleum hydrocarbon (TPH) analytical results. Table 4 provides a summary of soil HVOC results. Table 5 provides a summary of groundwater TPH analytical results. Table 6 provides a summary of groundwater halogenated volatile organic compound (HVOC) analytical results. Tables 3 and 5 include testing requirements for gasoline-range organics (GRO) listed in MTCA Table 830-1, with the exception of 1,2-DBE in soil and n-hexane and naphthalene in soil and groundwater. 1,2-DBE was not detected at a concentration exceeding laboratory reporting limits in groundwater. MTCA Table 830-1 footnotes state, "testing for n-hexane is required when VPH analysis is performed for



Method B or C", and "testing for the noncarcinogenic polyaromatic hydrocarbons, including the 'naphthalenes' (naphthalene, 1-methyl-naphthalene, and 2-methyl-naphthalene) is not required when using MTCA Method A cleanup levels, because they are included in the TPH cleanup level." MTCA Method A cleanup levels are being used for the Site; therefore, n-hexane and naphthalenes were not analyzed.

3. ECOLOGY COMMENT

To assist Ecology in evaluating your Site, and the extent to which hazardous substances have been remediated to concentrations below applicable cleanup levels, please provide isopleth figures in both plan view and geologic cross-section, as well as summary tables, that clearly demonstrate the locations and extents of all hazardous substances in all media, and not just those hazardous substances that exceed a proposed cleanup level. Please ensure that you are using the most recent and relevant analytical data to present the current Site conditions.

FARALLON RESPONSE

The requested additional summary tables and figures are attached, as follows:

- Figure 1 shows a Site Plan that identifies the Site and the Lake Tapps Dry Cleaning Facility (herein referred to as the Dry Cleaning Facility) boundaries, sample locations associated with the Site, including point-of-compliance groundwater monitoring wells, and sample locations associated with the Dry Cleaning Facility.
- Figure 2 shows TPH soil analytical results for subsurface investigation activities conducted following excavation and removal of the TPH-impacted source area that occurred at the Site in 2011, and HVOC soil analytical results for the Dry Cleaning Facility.
- Figure 3 shows current TPH groundwater analytical results following excavation and removal of the TPH-impacted source area at the Site, and current HVOC groundwater analytical results at the Dry Cleaning Facility.
- Figure 4 is a cross section showing the current extent of HVOCs detected at concentrations exceeding laboratory practical quantitation limits in soil and groundwater associated with the Dry Cleaning Facility, confirming that no commingling between the Site and the Dry Cleaning Facility boundaries is occurring.

4. ECOLOGY COMMENT

Ecology does not concur with the terrestrial ecological evaluation (TEE) form submitted in April 2017. If a Simplified TEE is still appropriate for the Site, supporting documentation demonstrating the undeveloped land within 500 feet of any area of the Site should be included.



FARALLON RESPONSE

A TEE is required under Section 7490 of Chapter 173-340 of the Washington Administrative Code (WAC 173-340-7490) for any site where a hazardous substance has been released to soil. The regulation requires that one of the following actions be taken:

- Document a TEE exclusion using the criteria presented in WAC 173-340-7491;
- Conduct a simplified TEE in accordance with WAC 173-340-7492; or
- Conduct a site-specific TEE in accordance with WAC 173-340-7493.

The required TEE Form, completed Table 749-1, and supporting Figure 1A for the Site are provided in Attachment A. Based on the criteria for TEE exclusion in WAC 173-340-7491(1)(c), the Site is excluded from a TEE, as there are fewer than 1.5 acres of contiguous undeveloped land on the Site or within 500 feet of any area of the Site, and the hazardous substances listed in WAC 173-340-7491(1)(c)(ii) are not present. No further consideration of terrestrial ecological impacts is required under MTCA.

5. ECOLOGY COMMENT

Ecology requests that you provide an identification key for analytical sample locations that lists and designates which monitoring wells, borings, and other sample locations that are being used for the Lake Tapps Mini Mart Site, the Lake Tapps Dry Cleaner Site, and both sites.

FARALLON RESPONSE

Attached Figure 1 identifies monitoring wells located on the Site versus the Dry Cleaning Facility. Boring and soil sample locations at the Site and the Dry Cleaning Facility were identified in historical reports previously provided to Ecology . Collective historical documentation and the supplemental materials provided herein are sufficient for Ecology to define the sites and evaluate the cleanup status of the limited release of gasoline at the former dispenser location at the Site.

ESTABLISHMENT OF CLEANUP STANDARDS

6. ECOLOGY COMMENT

Ecology has determined the cleanup levels and points of compliance you established for the Site do not meet the substantive requirements of MTCA. Under MTCA, cleanup standards consist of three primary components; (a) points of compliance, (b) cleanup levels, and (c) applicable state and federal laws. Ecology will need you to propose specific:

- *Points of compliance.*
- Applicable local, state, and federal laws.
- Cleanup screening levels used for all hazardous substances detected at all points of compliance.



• *Appropriate* cleanup levels for all hazardous substances that exceeded cleanup screening levels.

FARALLON RESPONSE

The investigation and cleanup being conducted at the Site is a routine petroleum cleanup for a limited release of gasoline associated with a leaking component of the former dispenser at the retail gasoline station at the Site. For decades, cleanup standards for a retail gasoline station have been firmly established in various guidance documents that supplement requirements under MTCA. Standard points of compliance, Applicable or Relevant and Appropriate Requirements, and MTCA Method A cleanup levels established for routine cleanup actions and for use in model remedy-types sites such as the Site are relevant and applicable for the Site, and require no further explanation. The monitoring well network currently surrounding the dispenser island, which replaced the former dispenser island during the cleanup action, is more than adequate to serve as points of compliance for groundwater. Ecology has been provided with sufficient information regarding historical Site investigation and cleanup work to establish that this work meets the requirements under MTCA and associated petroleum investigation/ cleanup guidance documents. If Ecology questions whether a specific cleanup standard under this routine model remedy has been met, please identify that cleanup standard, and Farallon will be pleased to discuss it.

ADDITIONAL ECOLOGY REQUEST

Additional data items for the Site were requested by Ecology in a February 26, 2021 email to Farallon.² Farallon's previously provided response to that request is summarized below.

7. ECOLOGY REQUEST

Ecology stated that additional data relevant to the Mini-Market Site needed to be uploaded to the Ecology Environmental Information Management System (EIM) Database. Specifically requested were groundwater data since August 2005 that have been used to assess or define the Mini-Mart Site, and any soil data collected for the Mini-Market Site during the required time frame starting in August 2005.

FARALLON RESPONSE

The requested data for the Site were submitted to the Ecology EIM Coordinator on April 1, 2022. Data relating to the Dry Cleaning Facility were submitted for upload under the now-separate Dry Cleaning Facility Study ID. Remaining data submitted included groundwater data collected by Environmental Associates, Inc. (EAI) in 2005 and 2006, and by Farallon in 2008, 2012, 2014, 2015, and 2017. Remaining data for the Dry Cleaning Facility included soil data collected by EAI in 2005 and by Farallon in 2009, and groundwater data collected by EAI in 2005 and 2006, and by Farallon in 2008, 2009, 2012 through 2014, 2016, 2017, and 2021. Tables 2 through 6 provide

² Email message regarding EIM Data Submission – Study ID VCSW0741 sent February 26, 2021 from Aaren Fiedler of Ecology to Molly Ware of Ecology and Thomas Metos of Farallon.

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all soil and groundwater data collected at the Site, excluding data for performance soil samples collected during excavation, which was provided in the Cleanup Action Progress Report prepared by Farallon dated May 16, 2012³ previously submitted to Ecology. Notice that the data were received and would undergo processing was received from the Ecology EIM Coordinator on April 1, 2022. Notice of successful upload of the data to the EIM is pending.

A complete set of environmental data for the Site now is available in the EIM database. The Mini-Market and Dry Cleaner Facility Study ID numbers and the file names for the uploaded EIM data are as follows:

- Mini-Market (Study ID VCSW0741):
 - o VCSW0741_GW_Results_2022-04-01.csv
 - o VCSW0741_WellLevels_2022-03-31.csv
- Dry Cleaner Facility (Study ID: FS10057):
 - o FS10057_GW_Results_2022-04-01.csv
 - o FS10057_Locations_2022-04-01.csv
 - o FS10057_Soil_Results_2022-04-01.csv
 - o FS10057_WellLevels_2022-04-01.csv

CLOSING

Farallon appreciates the opportunity to provide the requested information, and trusts that this provides sufficient information to address the comments provided in the Opinion Letter. If you have questions, please contact either of the undersigned at (425) 295-0800.

Sincerely,

Farallon Consulting, L.L.C.

Emerald Erickson-Mulanax, L.G. Senior Geologist



Emerald J. Erickson-Mulanax

Jeffrey Kaspar

Jeffrey Kaspar, L.G., L.H.G. Principal Geologist

³ Cleanup Action Progress Report, Lakes Tapps Plaza Mini-Market Site, 18215 9th Street East, Lake Tapps, Washington dated May 16, 2012 prepared by Farallon for S&V Properties Association II.



Attachments: Figure 1, Site Plan
Figure 2, Site Plan Showing Soil Analytical Data
Figure 3, Site Plan Showing Groundwater Analytical Data
Figure 4, Cross Section A-A'
Table 1, Groundwater Levels and Elevations
Table 2, Natural Attenuation and Water Quality Parameters
Table 3, Soil Analytical Results for TPH
Table 4, Soil Analytical Results for HVOCs
Table 5, Groundwater Analytical Results for HVOCs
Table 6, Groundwater Analytical Results for HVOCs
Attachment A, TEE Evaluation Form

cc: Steve Slivinski, S&V Properties Association LLC

EEM/JK/bjj

FIGURES

RESPONSE TO APRIL 1, 2021 ECOLOGY LETTER LAKE TAPPS MINI-MARKET 18215 9th Street East Lake Tapps, Washington

Farallon PN: 571-001









LEGEND			
PROPERTY BOUNDARY	[5.0' <2 <0.02]	= SOIL ANALYTICAL RES	ULT [DEPTH BGS GRO BENZENE PCE] IN MILLIGRAMS PER
DRY CLEANING FACILITY BOUNDARY		KILOGRAM	
——————————————————————————————————————	<	= DENOTES ANALYTE NO LIMIT	DT DETECTED AT OR EXCEEDING THE LISTED REPORTING
		= DENOTES SAMPLE NO	T ANALYZED OR DATA UNKNOWN
2011 EXCAVATION LIMITS	BOLD	= DENOTES CONCENTRA	TIONS THAT EXCEED THE WASHINGTON STATE MODEL
MW-13 🔶 GROUNDWATER MONITORING WELL INSTALLED BY FARALLON CONSULTING, L.L.C.	BGS	TOXICS CONTROL ACT = BELOW GROUND SURF	CLEANUP REGULATION CLEANUP LEVEL
MW-8 📥 GROUNDWATER MONITORING WELL INSTALLED BY	PCE	= TETRACHLOROETHENI	Ξ
ENVIRONMENTAL ASSOCIATES, INC.	GRO	= TOTAL PETROLEUM HY	DROCARBONS AS GASOLINE RANGE ORGANICS
MW-18 🚯 POINT OF COMPLIANCE MONITORING WELL	VC	= VINYL CHLORIDE	
B8 • BORING LOCATION	ND	= NOT DETECTED AT OR	EXCEEDING AN UNKNOWN REPORTING LIMIT
A3-PS32 A CONFIRMATION SOIL SAMPLE LOCATION		Washington Issaquah Bellingham Seattle	FIGURE 2
		Oregon Portland Baker City	SITE PLAN SHOWING SOIL ANALYTICAL DATA
UST = UNDERGROUND STORAGE TANK	EDALLO	California	LAKE TAPPS, WASHINGTON
RED = DRY CLEANING FACILITY	FARALLO Consul	Oakland Irvine	
BLUE = MINI-MARKET SITE	Your Challenges. Our P	riority. farallonconsulting.com	
ALL LOCATIONS ARE APPROXIMATE	Drawn By: NM	Checked By: CB	FARALLON PN: 571-001



LEGE	<u>ND</u>				
	PROPERTY BOUNDARY	[09/26/2005 170 7] =	GROUNDW	ATER ANALYTICAL RESULT [SAMPLE
	DRY CLEANING FACILITY BOUNDARY			DATE GRO	BENZENE PCE VC] IN MICROGRAMS PER LITER
	MINI-MARKET SITE BOUNDARY	<	=	DENOTES A	NALYTE NOT DETECTED AT OR EXCEEDING THE LISTED
—x —x —x — — — — — — — — — — — — — — —	FENCE LINE		=	DENOTES S	SAMPLE NOT ANALYZED OR DATA UNKNOWN
	2011 EXCAVATION LIMITS	BOLD	=	DENOTES C	CONCENTRATIONS THAT EXCEED THE WASHINGTON STATE
	CURRENT EXTENT OF HALOGENATED VOLATILE ORGANIC			MODEL TO	KICS CONTROL ACT CLEANUP REGULATION CLEANUP LEVEL
	COMPOUNDS (HVOCS) DETECTED ABOVE THE LABORATORY	Y PCE	=	TETRACHLO	DROETHENE
	PRACTICAL QUANTITATION LIMITS IN SOIL AND GROUNDWA	TER GRO	=	TOTAL PET	ROLEUM HYDROCARBONS AS GASOLINE RANGE ORGANICS
MW-13 🔶	GROUNDWATER MONITORING WELL INSTALLED BY FARALLON CONSULTING, L.L.C.	VC	=	VINYL CHLO	DRIDE
MW-8 🔶	GROUNDWATER MONITORING WELL INSTALLED BY ENVIRONMENTAL ASSOCIATES, INC.	ALL LOCATIONS AR	E APPROXIMA	ΓE	
MW-18😌	POINT OF COMPLIANCE MONITORING WELL		Issaquah Bel	Washington lingham Seattle	FIGURE 3
MW-5 🔶	DECOMMISSIONED MONITORING WELL		Port	Oregon land Baker City	SITE PLAN SHOWING GROUNDWATER ANALYTICAL DATA LAKE TAPPS MINI-MARKET
UST =	UNDERGROUND STORAGE TANK	EDALLON		California	LAKE TAPPS, WASHINGTON
RED =	DRY CLEANING FACILITY	FARALLON		Oakland Irvine	
BLUE =	MINI-MARKET SITE	Your Challenges, Our Priority	NG	m	
* =	NO CURRENT HVOCS DETECTED ABOVE				
	LABORATORY REPORTING LIMITS	Drawn By: NM	Checked By: C	B	FARALLON PN:571-001











-530

└<u>52</u>0

VATION IN T(NAVD88)







[14.5-15.0' ND ND] [12/20/2012 <100 <1.0] < BOLD	 SOIL ANALYTICAL RESULT [DEPTH BGS GRO BENZENE PCE VC] IN MILLIGRAMS PER KILOGRAM GROUNDWATER ANALYTICAL RESULT [SAMPLE DATE GRO BENZENE PCE VC] IN MICROGRAMS PER LITER DENOTES ANALYTE NOT DETECTED AT OR EXCEEDING THE LISTED REPORTING LIMIT DENOTES SAMPLE NOT ANALYZED OR DATA UNKNOWN DENOTES CONCENTRATIONS THAT EXCEED THE WASHINGTON STATE MODEL TOXICS CONTROL ACT CLEANUP REGULATION CLEANUP LEVEL
BGS	= BELOW GROUND SURFACE
PCE	= TETRACHLOROETHENE
GRO	= TOTAL PETROLEUM HYDROCARBONS AS GASOLINE RANGE ORGANICS
VC	= VINYL CHLORIDE
ND	= NOT DETECTED AT OR EXCEEDING AN UNKNOWN REPORTING LIMIT
RED	= DRY CLEANING FACILITY
BLUE	= MINI-MARKET SITE
	 CURRENT EXTENT OF HALOGENATED VOLATILE ORGANIC COMPOUNDS (HVOCS) DETECTED ABOVE THE LABORATORY PRACTICAL QUANTITATION LIMITS IN SOIL AND GROUNDWATER FORMER EXTENT OF TOTAL PETROLEUM HYDROCARBONS DETECTED ABOVE LABORATORY PRACTICAL QUANTITATION LIMITS IN GROUNDWATER 2011 EXCAVATION LIMITS
	- ZUTTEAGAVATION LIVITIS

-	- 201
	ALL LOCATIONS ARE APPROXIMATE
	FIGURES WERE PRODUCED IN
	COLOR. GRAYSCALE COPIES MAY
	NOT REPRODUCE ALL ORIGINAL
	INFORMATION.

Issaq	Washington uah Bellingham Seattle	FIGURE 4
	Oregon Portland Baker City	CROSS SECTION A-A' LAKE TAPPS MINI-MARKE
FARALLON	California Oakland Irvine	LAKE TAPPS, WASHINGTC
Your Challenges. Our Priority. farallon	consulting.com	FARALLON PN:571-001

FIGURE 4
CROSS SECTION A-A'
LAKE TAPPS MINI-MARKET

6, WASHINGTON

Date: 5/2/2022

Drawn By: NM Checked By: CB

TABLES

RESPONSE TO APRIL 1, 2021 ECOLOGY LETTER LAKE TAPPS MINI-MARKET 18215 9th Street East Lake Tapps, Washington

Farallon PN: 571-001

Monitoring Well No.	Water Level Measurement Date	Well Head Elevation ¹ (feet)	Estimated Well Screen Internal (feet below TOC)	Depth to Water ² (feet)	Groundwater Level Elevation (feet)
	11/26/2005			5.20	533.44
	8/2/2006		Well Head Clevation ¹ (feet) Estimated Well Screen Internal (feet below TOC) Depth to Water ² I 5.20 6.40 3.56 6.40 3.56 6.40 3.56 6.40 3.56 6.40 3.56 6.40 3.56 6.64 3.85 4.27 6.00 6.52 6.77 6.00 6.52 6.64 3.40 5.14 2.96 6.64 3.40 5.14 2.96 6.64 3.40 5.14 2.96 6.64 3.40 5.14 2.96 6.64 3.40 5.14 2.96 5.14 2.96 6.64 3.66 6.66 6.00 5.83 2.86 6.66 6.00 5.05 4.72 7.95 6.02 6.02 6.06 6.06 6.06 6.06 6.06 5.43 6.60 5.31 4.77 4.67 6.60 6.04 5.31 5.31 4.77 4.67 6.04 5.31 6.04 5.31 6.04 5.31 6.04 5.31 6.04 5.81 6.02 6.04	532.24	
	Monitoring Well No. Measurement Date 11/26/2005 8/2/2006 12/30/2006 5/6/2008 3/24/2009 5/8/2009 6/11/2009 9/15/2009 9/15/2009 10/7/2009 11/10/2010 1/25/2012 4/24/2012 8/15/2012 12/20/2012 8/15/2012 12/20/2012 8/15/2012 12/20/2012 8/19/2013 8/27/2014 11/24/2014 2/25/2015 5/26/2015 8/19/2019 8/27/2020 9/20/2021 11/26/2006 8/27/2020 9/20/2021 11/26/2006 8/27/2020 9/20/2021 11/26/2006 8/27/2009 9/20/2021 11/26/2006 8/2/2006 12/30/2006 5/6/2008 3/24/2009 5/8/2009 6/11/2009 9/15/2009 9/15/2009 9/15/2009			3.56	535.08
	5/6/2008	Level ent Date Well Head Elevation ¹ (feet) Estimated Well Screen Internal (feet below TOC) Depth to Water (feet) 2005 006 2006 008 009 009 009 009 009 009 009 009 009	5.53	533.11	
	3/24/2009			3.85	534.79
	5/8/2009			4.27	534.37
	6/11/2009			6.00	532.64
	0/1/2009			6.52	532.12
	9/1/2009			6.77	522.26
	9/15/2009			6.64	532.00
	10/ //2009			0.04	535.00
	11/10/2009			3.40	535.24
	12/9/2009			5.14	533.50
MW 4	1/19/2010	538 61	5 10	2.96	535.68
101 00 -4	2/10/2010	556.04	5-10	2.44	536.20
	1/25/2012			2.64	536.00
	4/24/2012			3.66	534.98
	8/15/2012			Internal low TOC) Depth to Water ² Level Elevation (feet) 5.20 533.44 6.40 532.24 3.56 535.08 5.53 533.11 3.85 534.79 4.27 534.37 6.00 532.64 6.52 532.12 6.77 531.87 6.28 532.36 6.64 532.00 3.40 535.24 5.14 533.50 2.96 535.68 2.96 535.68 2.96 535.68 2.96 535.68 2.96 535.68 2.96 535.68 2.96 535.68 2.96 535.68 2.96 535.68 2.96 535.68 2.96 535.68 5.83 532.81 2.86 535.78 6.66 531.98 6.00 532.64 5.05 533.92 7.95	
	12/20/2012		$5-10 \qquad \begin{array}{c ccccccccccccccccccccccccccccccccccc$	535.78	
	8/19/2013			6.66	531.98
	8/27/2014			6.00	532.64
	11/24/2014			5.05	533.59
	2/25/2015			4.72	533.92
	5/26/2015			7.95	530.69
	8/19/2019			6.02	532.62
	8/27/2020			6.05	532.59
	9/20/2021			6.06	532.58
	11/26/2006			5.43	533.95
	8/2/2006			6.80	532.58
	12/30/2006			mated Well een Internal below TOC) Depth to Water (feet) Groundwater Level Elevation (feet) 5.20 533.44 6.40 532.24 3.56 535.08 5.53 533.11 3.85 534.79 4.27 534.37 6.00 532.64 6.52 532.12 6.77 531.87 6.28 532.00 6.64 532.00 3.40 535.24 5.14 533.50 2.96 535.68 2.96 535.68 2.44 536.20 2.64 536.00 3.66 534.98 5.83 532.81 2.86 535.78 6.66 531.98 6.00 532.64 5.05 533.59 4.72 533.92 7.95 530.69 6.02 532.64 5.05 532.59 6.06 532.59 6.02 532.59 6.06 532.59 6.05 532.59 6.80 532.58 5.43 533.92 5.31 534.07 <	
	5/6/2008				
	3/24/2009	ate Elevation ¹ (feet) (feet below TOC) (feet) - 6.40 3.56 - 6.40 3.56 - 6.40 3.56 - 6.60 6.00 - 6.64 3.40 - 6.64 3.40 - 6.64 3.40 - 6.64 3.40 - 6.64 3.40 - 6.64 3.40 - 5.14 2.96 - 2.64 3.66 - 2.64 3.66 - 6.02 6.02 - 6.02 6.02 - 6.02 6.02 - 6.02 6.02 - 6.13 6.80 - 5.31 4.77 - 6.60 6.02 - 6.13 6.80 - 5.31 4.77	4.77	534.61	
	5/8/2009			4.67	534.71
	6/11/2009			6.04	533.34
MW-5 ³	0/1/2009	539.38	6-13	6.60	532.78
	9/1/2009		6.40		
$MW-4 = \frac{9/}{9/7}$ 10 $11/7$ 12 $1/7$ $4/7$ $4/7$ $8/7$ $12/7$ $8/7$ $11/7$ $8/7$ $8/7$ $8/7$ $8/7$ $8/7$ $8/7$ $8/7$ $8/7$ $9/7$ $11/7$ $8/7$ $9/7$ $11/7$ $8/7$ $9/7$ $11/7$	10/7/2009			6.23	533.15
	11/10/2009			4.19	535.19
	12/9/2009	$\begin{array}{c c c c c c c c c c c c c c c c c c c $	533.92		
	1/19/2010			3.63	535.75
	2/10/2010			5.21	534.17

1 of 5

			Estimated Well		Groundwater
Monitoring Well	Water Level	Well Head	Screen Internal	Depth to Water ²	Level Elevation
No.	Measurement Date	Elevation ¹ (feet)	(feet below TOC)	(feet)	(feet)
	11/26/2005			3.31	535.16
	8/2/2006			Groundwater (feet) Groundwater Level Elevation (feet) 3.31 535.16 3.31 535.16 3.31 535.16 3.31 535.16 3.65 534.82 5.10 533.37 3.56 534.91 5.01 533.46 3.89 534.58 3.99 534.48 3.67 534.80 3.57 534.90 3.62 534.85 3.29 535.18 3.85 534.62 3.10 535.37 3.81 534.62 3.10 535.32 3.32 535.15 3.46 535.01 3.09 535.38 3.55 534.92 3.56 534.91 3.88 534.59 3.54 535.01 3.30 535.17 3.36 535.17 3.30 535.50 4.19 535.01 3.55 535.65	
	12/30/2006				
	5/6/2008				
	3/24/2009			3.56	b to WaterLevel Elevation(feet)3.313.31535.163.31535.163.65534.825.10533.373.56534.915.01533.463.89534.583.99534.483.67534.803.57534.903.62534.853.29535.183.85534.623.10535.373.81534.623.10535.373.81534.663.15535.323.32535.153.46535.013.09535.383.55534.923.56534.913.88534.593.54534.936.80531.673.30535.113.30535.173.46535.014.19535.014.19535.013.55533.654.79534.413.68535.525.63533.576.11533.094.19535.014.19535.014.19535.014.10535.014.11535.094.76534.443.98535.22
	5/8/2009			5.01	533.46
	6/11/2009			3.89	534.58
	7/9/2009			3.99	534.48
	9/1/2009			3.67	534.80
	9/15/2009			3.57	534.90
	10/7/2009			3.62	534.85
	11/10/2009			3.29	535.18
	12/9/2009			3.85	534.62
MW-6	1/19/2010	538.47	5-10	3.10	535.37
	2/10/2010	000117	0 10	3.81	534.66
	1/25/2012			3.15	535.32
	4/24/2012			3.32	535.15
	8/15/2012			3.46	535.01
	12/20/2012			3.09	535.38
	8/19/2013			3.55	534.92
	8/27/2014			3.56	to waterLevel Elevationfeet)(feet) 3.31 535.16 3.31 535.16 3.31 535.16 3.65 534.82 5.10 533.37 3.56 534.91 5.01 533.46 3.89 534.58 3.99 534.48 3.67 534.80 3.57 534.90 3.62 534.85 3.29 535.18 3.85 534.62 3.10 535.37 3.81 534.66 3.15 535.32 3.22 535.15 3.46 535.01 3.09 535.38 3.55 534.92 3.56 534.91 3.88 534.59 3.54 534.92 3.56 534.91 3.30 535.17 3.46 535.01 3.30 535.90 4.19 535.01 3.30 535.52 5.63 533.57 6.11 533.09 4.79 534.41 3.68 535.52 5.63 533.57 6.11 533.09 6.39 532.81 5.89 533.31 6.28 532.92 4.50 534.70 5.43 537.75 5.10 534.44 3.98 535.22
	11/24/2014			$\begin{array}{ c c c c c c c c c c c c c c c c c c c$	
	2/25/2015		3.54	534.93	
	5/26/2015			3.55 534.9 3.56 534.9 3.88 534.5 3.54 534.9 6.80 531.6 3.36 535.1 3.30 535.1 3.46 535.0	531.67
	8/2'//2014 11/24/2014 2/25/2015 5/26/2015 8/19/2019 8/27/2020 9/20/2021			3.36	535.11
	8/27/2020			Image: best for Water * Level TOC) (feet) 3.31 3.31 3.31 3.31 3.65 5.10 3.56 5.10 3.56 5.01 3.89 3.89 3.99 3.67 3.67 3.62 3.89 3.67 3.62 3.89 3.67 3.62 3.81 3.10 3.81 3.10 3.81 3.10 3.81 3.10 3.81 3.10 3.81 3.10 3.81 3.10 3.81 3.15 3.32 3.46 3.09 3.55 3.56 3.30 3.46 3.30 3.46 4.19 3.55 4.79 3.68 5.63 6.11 6.39 5.89 6.28 4.50 5.10 4.19 4.19 3.70	535.17
	9/20/2021			3.46	535.01
	11/26/2005			4.44	534.76
	8/2/2006			3.30	535.90
	12/30/2006			4.19	535.01
	5/6/2008			3.55	535.65
	3/24/2009			4.79	534.41
	5/8/2009			3.68	535.52
	6/11/2009			5.01 533.46 3.89 534.58 3.99 534.48 3.67 534.80 3.57 534.90 3.62 534.85 3.29 535.18 3.85 534.62 3.10 535.37 3.81 534.66 3.15 535.32 3.32 535.15 3.46 535.01 3.09 535.38 3.55 534.92 3.56 534.91 3.88 534.59 3.56 534.91 3.88 534.59 3.54 534.93 6.80 535.17 3.46 535.01 4.44 534.76 3.30 535.17 3.46 535.01 4.19 535.01 4.19 535.01 4.68 535.52 5.63 533.57 6.11 533.09 4.19 535.01 5.89 533.31 6.28 532.92 4.50 534.70 5.43 535.01 4.11 535.09 4.12 535.01 4.11 535.00 5.10 534.44 3.98 535.22	
	7/9/2009			6.11	533.09
	9/1/2009			6.39	532.81
MW-7	9/15/2009	539.20	5-10	5.89	533.31
	10/7/2009			6.28	532.92
	11/10/2009			4.50	534.70
	12/9/2009			5.43	533.77
	1/19/2010			3.70	535.50
	2/10/2010			5.10	534.10
MW-7	1/25/2012			4.19	535.01
	4/24/2012			4.11	535.09
	8/15/2012			4.76	534.44
	12/20/2012			3.98	535.22

2 of 5

			Estimated Well		Groundwater
Monitoring Well	Water Level	Well Head	Screen Internal	Depth to Water ²	Level Elevation
No.	Measurement Date	Elevation ¹ (feet)	(feet below TOC)	(feet)	(feet)
	8/19/2013			5.56	533.64
	8/27/2014		Estimated Well Screen Internal (feet below TOC) Depth to Water ² (feet) Gro Level 5.56 5 5.45 5 5.45 5 6.18 5 5.27 5 5.20 5.27 5.21 5 5.226 5 5.23 5 5.26 5 5.20 5.93 11.15 5 8.96 5 10.47 5 9.20 5 9.40 5 10.37 5 10.75 5 10.94 5 10.94 5 9.89 5 10.80 5 8.57 5 9.89 5 10.18 5 6.21 5 10.18 5 10.18 5 10.18 5 10.11 5 10.21 5	533.75	
	11/24/2014			Groundwat (feet) Groundwat Level Elevati (feet) 5.56 533.64 5.45 533.75 6.18 533.02 5.27 533.93 7.80 531.40 4.38 534.83 5.21 533.99 5.26 533.94 5.93 533.27 11.15 529.50 8.96 531.69 10.47 530.18 9.20 531.45 9.40 531.25 10.37 530.28 10.75 529.90 10.94 529.71 10.50 530.15 10.80 529.85 8.57 532.08 9.89 530.76 8.33 532.32 9.66 530.99 8.56 532.09 5.93 534.72 10.18 530.47 6.21 534.44 10.52 530.13 10.40 530.25 10.16 530.	533.02
NUN 7	2/25/2015			5.27	533.93
MW-7 (Continued)	5/26/2015	539.20	5-10	7.80	531.40
(Continued)	5/26/2017			4.38	534.83
	8/19/2019			5.21	533.99
	8/27/2020			5.26	533.94
	9/20/2021			5.93	533.27
	8/2/2006			11.15	529.50
	12/30/2006			8.96	531.69
	5/6/2008			10.47	530.18
	3/24/2009			9.20	531.45
	5/8/2009			9.40	531.25
	6/11/2009			10.37	530.28
	7/9/2009			10.75	529.90
	9/1/2009			10.94	529.71
	9/15/2009			10.50	530.15
	10/7/2009			10.80	529.85
MW-10	11/10/2009			8.57	532.08
	12/9/2009			9.89	530.76
	1/19/2010			8.33	532.32
MW-10	2/10/2010	540.65	16-26	9.66	530.99
	1/25/2012			8.56	532.09
	4/24/2012			5.93	534.72
	8/15/2012			10.18	530.47
	12/20/2012			6.21	534.44
	8/19/2013			10.52	530.13
	8/27/2014			10.40	530.25
	11/24/2014			10.16	530.49
	2/25/2015			10.03	530.62
	5/26/2015			11.93	528.72
	8/10/2010			10.21	530.44
	8/27/2020			10.21	530.54
	0/20/2021			10.11	530.37
	9/20/2021 3/24/2009			7 25	533.37
	5/8/2009			7.55	533.16
	6/11/2009			8.63	532.05
	7/9/2009			9.10	531.58
	9/1/2009		Internation Depth to Value Development (feet) (feet) (feet) (feet) (feet) (feet) 5-10 5.56 533.64 5.45 533.75 6.18 5.27 533.93 53.483 5.21 533.94 533.94 5.93 533.27 533.94 5.93 533.27 11.15 5.93 533.27 11.15 5.93 533.27 11.15 11.15 529.50 8.96 8.96 531.69 10.47 10.47 530.18 9.20 9.40 531.25 10.37 10.37 530.28 10.75 10.50 530.15 10.80 10.80 529.85 8.57 8.33 532.32 10.37 10.50 530.15 10.80 10.80 529.85 8.57 8.33 532.32 10.18 9.89 530.76		
MW-11 ³	9/15/2009	540.68	5-20	8.77	Groundwater Level Elevation (feet)5 533.64 5 533.75 8 533.02 7 533.93 0 531.40 8 534.83 1 533.99 5 533.94 8 533.27 5 529.50 5 531.69 7 530.18 0 531.45 0 531.45 0 531.45 0 531.45 0 531.45 0 531.25 7 530.28 5 529.90 4 529.71 0 530.15 0 529.85 7 532.08 9 530.76 3 532.32 5 530.99 5 532.09 3 534.72 8 530.47 1 530.44 2 530.13 0 530.25 6 530.49 3 532.05 0 531.58 4 531.53 0 534.38 3 532.95
	10/7/2009			9.15	531.53
	11/10/2009			6.30	534.38
	12/9/2009			7.98	532.70
	1/19/2010			5.75	534.93
	2/10/2010			7.73	532.95

			Estimated Well		Groundwater
Monitoring Well	Water Level	Well Head	Screen Internal	Depth to Water ²	Level Elevation
No.	Measurement Date	Elevation ¹ (feet)	(feet below TOC)	(feet)	(feet)
	3/24/2009			12.81	532.52
	5/8/2009		Estimated Well Screen Internal (feet below TOC) Depth to Water ² (feet) Groundwater Level Elevation (feet) 12.81 532.39 12.94 532.39 13.76 531.57 14.18 531.57 14.18 531.15 14.42 530.91 14.25 531.08 12.53 532.80 13.47 531.86 12.29 533.04 13.23 532.10 13.47 531.86 12.29 533.04 13.23 532.80 13.44 531.89 12.65 532.68 13.68 531.65 12.45 532.88 14.27 531.06 14.23 531.02 14.24 531.39 15.67 529.66 14.18 531.10 13.94 531.92 14.18 531.13 14.25 531.08 14.29 531.92 14.32 531.92 <	532.39	
	6/11/2009			531.57	
	7/9/2009			Groundwater Level Elevation (feet) Groundwater Level Elevation (feet) 12.81 532.52 12.94 532.39 13.76 531.57 14.18 531.15 14.42 530.91 14.03 531.30 14.25 531.08 12.53 532.80 13.47 531.86 12.29 533.04 13.23 532.68 13.44 531.89 12.65 532.68 13.68 531.65 12.45 532.88 14.27 531.06 14.05 531.28 14.23 531.10 13.94 531.39 15.67 529.66 14.18 531.15 14.25 531.08 14.65 530.68 12.90 533.34 13.20 533.04 13.80 532.44 14.25 531.92 14.36 531.92 13.48 533.04 <tr< td=""></tr<>	
	9/1/2009			14.42	Groundwater Level Elevation (feet)2.81 532.52 2.94 532.39 3.76 531.57 4.18 531.15 4.42 530.91 4.03 531.30 4.25 531.08 2.53 532.80 3.47 531.86 2.29 533.04 3.23 532.10 3.44 531.89 2.65 532.68 3.68 531.65 2.45 532.88 4.27 531.06 4.05 531.28 4.23 531.10 3.94 531.39 5.67 529.66 4.18 531.15 4.25 531.08 4.65 530.68 2.90 533.34 3.20 533.04 3.80 532.44 4.29 531.92 4.36 531.88 3.14 533.10 3.82 532.42 2.78 533.46 3.87 532.37 3.95 532.29 3.08 531.75 4.38 531.75 4.40 531.84 3.01 533.23 4.41 531.83 4.46 531.75 4.38 531.67 5.53 530.71
	9/15/2009			14.03	531.30
	10/7/2009			14.25	531.08
	11/10/2009			12.53	532.80
	1/10/2010			13.47	522.04
	2/10/2010			12.29	532.10
	1/25/2012			13.25	531.89
MW-12	4/24/2012	545.33	5-30	12.65	532.68
	8/15/2012			13.68	531.65
	12/20/2012			12.45	532.88
	8/19/2013			14.27	531.06
	8/27/2014			14.05	531.28
	11/24/2014		$ \begin{array}{r} 13.68 \\ 12.45 \\ 14.27 \\ 14.05 \\ 14.23 \\ 13.94 \\ 15.67 \\ 14.18 \\ 14.25 \\ 14.65 \\ 12.90 \\ 13.20 \\ \end{array} $	14.23	531.10
	2/25/2015			13.94	531.39
	5/26/2015			15.67	529.66
	8/19/2019			14.18	531.15
	8/27/2020			14.25	531.08
	9/20/2021			14.65	530.68
	3/24/2009			12.90	533.34
	5/8/2009			13.20	533.04
	6/11/2009			13.80	532.44
	7/9/2009			14.29	531.95
	9/1/2009			13.48	532.76
	9/15/2009			14.32	531.92
	10/ //2009			14.30	531.88
	12/0/2009			13.14	535.10
	1/19/2009		5-30 12.94 13.76 14.18 14.42 14.03 14.25 12.53 13.47 12.29 13.23 13.44 12.65 13.68 12.45 14.27 14.05 14.23 13.94 15.67 14.18 14.25 14.65 12.90 13.20 13.80 14.29 13.20 13.80 14.29 13.80 14.29 13.80 14.29 13.80 14.29 13.80 14.29 13.80 14.29 13.80 14.36 13.14 13.82 12.78 13.87 13.95 $5-30$ 13.08 14.40 13.01 14.41 14.46 14.49 14.38 14.32 14.40 13.01 14.41 14.46 14.49 14.38 15.66 14.71 14.57 15.53	533.46	
	2/10/2010			13.87	532 37
	1/25/2012			13.95	532.29
MW-13	4/24/2012	546.24	5-30	13.08	533.16
	8/15/2012			14.40	531.84
	12/20/2012			13.01	533.23
	8/19/2013			14.41	531.83
	8/27/2014			14.46	531.78
	11/24/2014			14.49	531.75
MW-13	2/25/2015			14.38	531.86
	5/26/2015			15.66	530.58
	8/19/2019			14.71	531.53
	8/27/2020			14.57	531.67
	9/20/2021			15.53	530.71

Monitoring Well	Water Level	Well Head	Estimated Well Screen Internal	Depth to Water ²	Groundwater Level Elevation
N0.	Measurement Date	Elevation (feet)	(feet below TOC)	(feet)	(feet)
	4/24/2012			3.09	535.71
	8/15/2012			5.18	534.22
	Well Water Level Measurement Date 1/25/2012 4/24/2012 8/15/2012 12/20/2012 8/19/2013 8/27/2014 11/24/2014 2/25/2015 5/26/2015 8/19/2019 8/27/2020 9/20/2021 1/25/2012 4/24/2012 8/19/2019 8/27/2020 9/20/2021 1/25/2012 4/24/2012 8/15/2012 12/20/2012 8/19/2013 8/27/2014 11/24/2014 2/25/2015 5/26/2015 5/26/2017 8/19/2019 11/25/2019 2/25/2020 6/3/2020 8/19/2019 8/27/2020 9/20/2021 1/25/2012 1/25/2012 1/25/2012 1/220/2012 8/19/2013 8/27/2014 11/24/2014 2/25/2015 <t< td=""><td></td><td></td><td>3.68</td><td>535.72</td></t<>			3.68	535.72
	8/19/2013		Estimated well Screen Internal (feet below TOC) Depth to Water ² (feet) 3.69 3.96 5.18 3.68 5.59 5.86 4-14 6.37 5.63 8.46 5.67 5.74 5.82 4.73 4.97 6.11 4.69 7.12 6.89 7.41 6.80 9.65 6.79 7 6.13 5.95 6.79 7 6.13 5.95 6.79 7 6.87 6.92 4.14 6.87 6.92 4.65 6.87 6.17 4.14 6.87 6.92 4.65 6.87 6.17 4.14 6.87 6.17 4.88 6.17 4.11 6.88 6.17 4.88 6.17 4.88 6.17 4.81 6.81 6.82	533.81	
	8/27/2014			Image: Constraint of the system Groundwate Level Elevation (feet) 3.69 535.71 3.96 535.71 3.96 535.44 5.18 534.22 3.68 535.72 5.59 533.81 5.86 533.54 6.37 533.03 5.63 533.73 5.63 533.73 5.64 533.73 5.65 533.73 5.67 533.73 5.74 533.66 5.82 533.58 4.73 535.83 4.97 535.59 6.11 534.45 4.69 535.87 7.12 533.44 6.89 533.67 7.12 533.44 6.80 533.76 9.65 530.91 6.083 534.47 6.79 533.77 7 533.64 6.13 534.43 5.95 534.61 6.79 <td< td=""><td>533.54</td></td<>	533.54
MW-18	11/24/2014	539.40	4-14	6.37	Groundwater Level Elevation (feet) Level Elevation 3.69 535.71 3.96 535.44 5.18 534.22 3.68 535.72 5.59 533.81 5.86 533.54 6.37 533.03 5.63 533.77 8.46 530.94 5.67 533.73 5.74 533.66 5.82 533.58 4.73 535.83 4.97 535.59 6.11 534.45 4.69 535.87 7.12 533.44 6.89 533.67 7.41 533.15 6.80 533.76 9.65 530.91 6.083 534.47 6.79 533.77 7 533.66 6.13 534.43 5.95 534.61 6.79 533.77 7 533.64 4.65 535.76
	2/25/2015			5.63	533.77
	5/26/2015			8.46	530.94
	8/19/2019		Screen Internal (feet below TOC) Depth to Water ² Level Elevation (feet) 3.69 535.71 3.96 535.71 3.96 535.72 5.18 534.22 3.68 535.72 5.59 533.81 5.86 533.54 6.37 533.03 5.63 533.77 8.46 530.94 5.67 533.73 5.74 533.66 5.82 533.58 4.73 535.83 4.97 535.87 7.12 533.44 6.89 533.67 7.41 533.15 6.80 533.76 9.65 530.91 6.89 533.67 7.41 533.56 6.13 534.43 5.95 534.61 6.79 533.77 7 533.56 6.13 534.43 5.95 534.61 6.79 533.76 <		
	8/27/2020			5.74	533.66
	9/20/2021			5.82	533.58
	1/25/2012			4.73	535.83
	4/24/2012			4.97	535.59
	8/15/2012			6.11	534.45
	12/20/2012			4.69	535.87
	8/19/2013		4-14	7.12	533.44
	8/27/2014			6.89	533.67
MW-19	11/24/2014			7.41	533.15
	2/25/2015			6.80	533.76
MW-19	5/26/2015	540.56		9.65	530.91
Monitoring Well No. MW-18 MW-19 MW-20	5/26/2017			6.083	534.47
	8/19/2019			6.79	533.77
	11/25/2019			7	533.56
	ing Well Water Level Io. Measurement Date 1/25/2012 4/24/2012 8/15/2012 8/15/2012 8/15/2012 8/19/2013 8/27/2014 2/25/2015 5/26/2015 5/26/2015 8/19/2019 8/27/2020 9/20/2021 1/25/2012 4/24/2012 8/15/2012 1/25/2012 4/24/2012 8/19/2013 8/27/2014 1/24/2014 2/25/2015 8/19/2013 8/27/2014 11/24/2014 2/25/2015 8/19/2019 11/25/2019 2/25/2015 5/26/2017 8/19/2019 11/25/2019 2/25/2020 6/3/2020 8/19/2019 1/25/2012 8/27/2020 9/20/2021 1/25/2012 1/25/2012 8/19/2013 8/27/2014 1/225/2015 5/26/2015 8/19/2013 8/27/2014 1/225/2015 5/26/2015 8/19/2013 8/27/2014 2/25/2015 5/26/2015	err Level Well Head Screen Internal (feet below TOC) I 5/2012 [6.13	534.43
	6/3/2020		5.95	534.61	
	8/19/2019		6.79	533.77	
	8/27/2020		Control (feet below TOC) Creation (feet) (feet below TOC) 3.69 3.96 5.18 3.68 5.59 5.86 5.63 8.46 5.67 5.74 5.82 4.14 6.37 5.82 4.73 4.97 6.11 4.69 7.12 6.89 7.41 6.80 9.65 6.79 7 6.13 5.95 6.79 7 6.13 5.95 6.79 7 6.13 5.95 6.79 7 6.13 5.95 6.79 6.87 6.92 4.65 4.88 6.17 4.14 6.87 6.81 6.88 6.87 6.81 6.88 6.81 6.81 6.85 6.97 6.97	533.69	
	9/20/2021			Groundwater Level Elevation (feet) Level Elevation 3.69 535.71 3.96 535.44 5.18 534.22 3.68 535.72 5.59 533.81 5.86 533.54 6.37 533.03 5.63 533.73 5.63 533.73 5.63 533.73 5.67 533.73 5.67 533.73 5.74 533.66 5.82 533.58 4.73 535.83 4.97 535.59 6.11 534.45 4.69 533.76 7.12 533.44 6.89 533.76 9.65 530.91 6.083 534.47 6.79 533.77 7 533.69 6.13 534.43 5.95 534.61 6.79 533.71 6.87 533.69 6.92 533.69<	
	1/25/2012			4.65	535.76
	4/24/2012			4.88	535.53
	8/15/2012			6.17	534.24
	12/20/2012			4.71	535.70
Monitoring Well No. MW-18 MW-19 MW-20	8/19/2013			7.11	533.30
	8/27/2014		ead (feet) Screen Internal (feet below TOC) Depth to Water ² (feet) Level Eleva (feet) 3.69 535.71 3.96 535.44 5.18 534.22 3.68 535.72 3.68 535.72 3.68 535.72 3.68 533.54 5.18 534.24 5.18 534.22 3.68 535.72 5.59 533.81 5.63 533.73 5.63 533.77 8.46 530.94 5.67 533.73 5.67 533.73 5.74 533.66 5.82 533.58 4.73 535.83 4.97 535.83 6.11 534.45 4.69 533.77 6.80 533.76 7.41 533.16 6.80 533.77 6.80 533.77 6.81 533.66 6.13 544.3 5.95 534.61<	533.54	
MW-20	11/24/2014	Well Head Elevation ¹ (feet) Estimated well Screen Internal (feet below TOC) Dep 539.40 4-14 1 539.40 4-14 1 540.56 4-14 1 540.41 4-14 1	7 37	533.04	
No. MW-18 MW-19 MW-20	2/25/2015			6.68	533.73
	5/26/2015			9.42	530.99
	8/10/2010			6.81	533.60
	8/27/2019		Bernantia (ret) Depth to Water ² Level Elevation (reet) 3.69 535.71 3.96 535.71 3.96 535.72 5.59 533.81 5.86 533.54 6.87 533.03 5.63 533.71 8.46 530.94 5.67 533.03 5.74 533.66 5.82 533.58 4.73 535.83 4.97 535.59 6.11 534.45 4.69 535.71 8.46 530.94 5.67 533.73 5.74 533.66 5.82 533.58 4.73 535.87 7.12 533.44 6.69 535.71 7.41 533.15 6.80 533.76 9.65 530.91 6.13 534.47 6.79 533.66 6.13 534.43 5.95 534.61 6.79		
	9/20/2021			6.97	533.44

NOTES:

¹ Elevation from survey conducted by PLS, Inc. on September 17, 2009. Farallon used a laser level to tie new monitoring wells MW-18, MW-19, and MW-20 into PLS, Inc.-surveyed monitoring well MW-6 on February, 15, 2012.

² In feet below top of well casing.

³ Monitoring wells MW-5 and MW-11 were abandoned and removed during the Farallon excavation conducted on November 21, 2011.

TOC = top of casing

Table 2Natural Attenuation and Water Quality ParametersLake Tapps Mini-Market SiteLake Tapps, WashingtonFarallon PN: 571-001

		E	lectron Receptor	ſS	Metabolic By-products				Water Quality Parameters ¹				Available Organic Carbon		
Sample Location	Sample Date	Dissolved Oxygen ¹ (mg/l)	Nitrate ² (mg/l)	Sulfate ² (mg/l)	Ferrous Iron ³ (mg/l)	Manganese (II) ⁴ (mg/l)	Methane ⁵ (mg/l)	Ethane ⁵ (mg/l)	Ethene ⁵ (mg/l)	Total Alkalinity ⁶ (mg/l)	рН	Temperature (°C)	Conductivity (mS/cm)	ORP (mV)	TOC ⁷ (mg/l)
	5/7/2008	0.66	0.4	10	4	< 0.1	0.748			70	6.25	12.02	0.185	-18.1	4.2
	9/16/2009	1.18	< 0.050	<5.0	4.0	0.0	2.8			67	6.02	20.63	0.319	165.5	6.3
Sample Location MW-4 MW-5 ⁸	12/9/2009	1.00	0.054	<5.0	2.8	0.1	3.4			78	7.10	9.21	0.158	150.9	7.3
	1/25/2012	0.28	< 0.050	5.1			1.3			66	6.16	7.45	0.233	128.7	3.4
	4/25/2012	0.24									6.13	11.94	0.198	-18.1	
	8/15/2012	0.45	< 0.050	<10	2.8		2.3			49	6.00	22.33	0.268	24.2	4.1
Sample Location MW-4 MW-5 ⁸	12/20/2012	0.58									6.76	8.83	0.145	-19.7	
	5/8/2008	0.08	0.16	<10	2	0.9	17.6			320	6.29	11.49	0.686	-31.1	88.5
NOV 5 ⁸	3/25/2009	0.37									8.41	5.97	0.802	-18	
MW-5	9/16/2009	1.40	0.067	<5.0	4.6	0.4	6.4			92	5.98	18.81	0.682	158.6	93
Sample Location	12/10/2009	0.91	0.16	<5.0	3.0	0.2	15.0			310	7.27	10.81	0.506	120.3	94
	5/7/2008	2.87	< 0.050	<10	4.4	0.4	15.3			180	6.12	11.26	0.501	-28.9	31.6
	3/24/2009	0.82									9.12	6.31	0.931	-41.7	
	9/16/2009	0.66	< 0.050	<5.0	2.9	0.1	0.44			<20	6.15	21.14	0.098	156.2	2.3
	12/9/2009	0.85	< 0.050	<5.0	3.4	0.2	4.4			80	6.92	9.31	0.136	151.4	7.7
M W -6	1/25/2012	0.29									6.34	7.43	0.543	35.8	
	4/25/2012	0.30									6.3	11.89	0.169	-38.0	
	8/15/2012	0.25			3.5						6.02	22.7	0.102	13.2	
Sample S Location S MW-4	12/20/2012	0.8									5.63	9.93	0.155	3.7	
	5/7/2008	0.66	< 0.050	6.5	3.4	< 0.1	0.596			40	6.3	11.52	0.095	-12.3	2.79
Sample Location	3/25/2009	0.24									8.17	5.24	0.789	-4.3	
	9/16/2009	0.92	0.13	<10	3.1	0.0	11.0			85	5.78	20.60	0.445	159.0	31
	12/9/2009	1.24	0.17	<25	3.4	1.0	15.0			300	6.47	11.11	0.509	159.0	41
NAM 7	1/25/2012	0.25									5.86	8.74	0.672	66.3	
IVI VV - /	4/25/2012	0.30									6.04	11.14	0.645	-27.3	
	8/15/2012	0.22			5.4						6.15	19.86	0.754	-22.0	
	12/20/2012	0.45									5.88	10.06	0.513	-0.2	
	5/26/2017	0.13									6.11	14.8	0.810	-32.5	
	8/19/2019	1.5									6.0	20.8	0.751	-39	
	5/8/2008	0.16	< 0.050	10	1	0.9	0.0083			210	6.66	12.73	0.362	33.7	<1.50
	3/24/2009	0.93									7.32	9.26	1.117	57.5	
	9/16/2009	1.00									6.48	17.59	0.364	155.7	
M31/ 10	12/10/2009	0.76									7.54	8.28	0.268	104	
IVI W-10	1/25/2012	1.25									6.46	11.44	0.443	78.4	
MW-4 MW-5 ⁸ MW-6 MW-7	4/25/2012	0.84									6.35	11.82	0.375	14.7	
	8/15/2012	2.67			0.6						6.45	27.27	0.316	47.2	
	12/20/2012	5.97									6.63	8.57	0.12	98.4	

Table 2Natural Attenuation and Water Quality ParametersLake Tapps Mini-Market SiteLake Tapps, WashingtonFarallon PN: 571-001

		E	lectron Receptor	°S	Metabolic By-products								Available Organic Carbon		
Sample Location	Sample Date	Dissolved Oxygen ¹ (mg/l)	Nitrate ² (mg/l)	Sulfate ² (mg/l)	Ferrous Iron ³ (mg/l)	Manganese (II) ⁴ (mg/l)	Methane ⁵ (mg/l)	Ethane ⁵ (mg/l)	Ethene ⁵ (mg/l)	Total Alkalinity ⁶ (mg/l)	рН	Temperature (°C)	Conductivity (mS/cm)	ORP (mV)	TOC ⁷ (mg/l)
	3/24/2009	0.58									7.22	8.8	1.03	60.9	
MW-11 ⁸	9/15/2009	0.64									6.14	20.13	0.333	163.1	
	12/10/2009	1.59									7.53	10.17	0.253	138.9	
	3/24/2009	3.69									7.6	8.6	0.966	73	
	9/15/2009	0.80									6.60	25.31	0.383	147.4	
	12/10/2009	1.68									7.81	10.26	0.252	70.1	
MW-12	1/25/2012	0.28									6.77	12.08	0.451	173.4	
	4/25/2012	0.18									6.55	13.8	0.365	-9.2	
	8/16/2012	0.49			0						6.44	18.33	0.361	96.7	
	12/20/2012	0.28									6.86	7.82	0.306	126.7	
	3/24/2009	3.17									6.82	8.33	0.993	80.5	
	9/15/2009	0.71									6.51	24.14	0.433	150.2	
	12/10/2009	0.82									7.84	10.09	0.276	66.1	
MW-13	1/25/2012	0.36									6.51	10.88	0.499	176.2	
	4/25/2012	0.30									6.32	12.8	0.346	16	
	8/15/2012	0.24			0						6.42	23.54	0.358	68.8	
	12/20/2012	0.48									6.77	9.19	0.302	24.9	
	1/25/2012	0.68	< 0.050	31			0.37			220	7.10	9.53	0.605	-7.0	6.0
	4/25/2012	0.19									6.95	11.76	0.540	-45.3	
	8/15/2012	0.14	< 0.050	7.6	0.8		2.1			330	6.75	18.59	0.545	-8.0	8.0
	12/20/2012	0.40									7.01	7.74	0.529	-26.1	
MW-18	8/27/2014	0.60									6.24	24.47	0.488	-14.0	
101 00 - 10	11/24/2014	0.63									6.34	14.21	0.548	-56.0	
	2/25/2015	0.60									6.57	12.4	0.542	-57.0	
-	5/26/2015	0.67									6.39	15.41	0.452	111	
	5/26/2017	0.23									6.68	15.0	0.433	-30.8	
	8/28/2019	0.8									6.7	20.2	0.469	-13	

Table 2 Natural Attenuation and Water Quality Parameters Lake Tapps Mini-Market Site Lake Tapps, Washington Farallon PN: 571-001

		FI	Electron Receptors			Metabolic By-products						Water Ouality Parameters ¹			
Sample Location	Sample Date	Dissolved Oxygen ¹ (mg/l)	Nitrate ² (mg/l)	Sulfate ² (mg/l)	Ferrous Iron ³ (mg/l)	Manganese (II) ⁴ (mg/l)	Methane ⁵ (mg/l)	Ethane ⁵ (mg/l)	Ethene ⁵ (mg/l)	Total Alkalinity ⁶ (mg/l)	рН	Temperature (°C)	Conductivity (mS/cm)	ORP (mV)	TOC ⁷ (mg/l)
	1/25/2012	1.28	< 0.050	<5.0			1.8			89	6.10	11.69	0.258	86.5	4.4
	4/25/2012	0.19									6.13	13.72	0.219	-17.7	
	8/15/2012	0.16	< 0.050	<5.0	3.6		0.76			72	5.96	19.56	0.187	18.9	3.2
	12/20/2012	3.02									6.32	7.38	0.142	2.1	
	8/27/2014	0.56									5.34	26.3	0.200	48.0	
	11/24/2014	0.39									5.95	15.83	0.239	-55.0	
MW-19	2/25/2015	0.60									5.99	13.08	0.206	-49.0	
	5/26/2015	0.55									5.92	17.15	0.172	129	
	5/26/2017	0.14									6.32	15.2	0.307	-43.3	
	8/28/2019	0.8									6.2	20.6	0.204	15	
	11/25/2019	2.5									5.9	14.7	0.232	-240	
	2/25/2020	0.1									5.9	12.9	0.220	-183	
	6/3/2020	0.2									5.5	15.4	0.201	33	
	1/25/2012	0.69	< 0.050	9.5			0.073			270	6.91	10.77	0.727	38.3	16
	4/25/2012	0.20									6.71	12.83	0.595	-66.0	
	8/15/2012	0.13	< 0.050	<10	5.4		0.74			270	6.65	20.65	0.650	-43.9	9.6
MW 20	12/20/2012	0.35									6.87	8.87	0.644	-53.0	
1 v1 vv - 20	8/27/2014	0.52									5.77	25.15	0.386	5.0	
	11/24/2014	0.39									5.67	13.25	0.201	-21.0	
	2/25/2015	0.42									6.02	11.89	0.316	-45.0	
	5/26/2015	0.54									6.13	16.94	0.351	117	

NOTES:

--- denotes sample not analyzed.

< denotes analyte not detected at or exceeding the reporting limit listed.

¹Collected using a Yellow Springs Instrument multimeter with flow-through cell.

² Analyzed by U.S. Environmental Protection Agency (EPA) Method 300.0.

³ Analyzed for conventional chemistry parameters by EPA Method/American Public Health Association (APHA) Methods SM 3500-Fe B.

⁴ Analyzed by EPA 6000/7000 Series Methods.

⁵ Analyzed by Gas Chromatograph/Flame Ionization Detector Headspace Method.

⁶ Analyzed for conventional chemistry parameters by EPA Method/APHA Methods SM 2320B.

⁷ Analyzed by EPA Method 415.1.

⁸ Monitoring wells MW-5 and MW-11 were abandoned and removed during the Farallon excavation conducted on November 21, 2011.

°C = degrees Celsius

electron receptors = compounds that gain electrons and are sources of energy during biodegradation metabolic by-products = compounds resulting from biodegradation processes mg/l = milligrams per liter (equivalent to parts per million) mS/cm = milliSiemens per centimeter mV = millivolt units for measurement of ORP

ORP = oxidation-reduction potential

TOC = total organic carbon

Table 3Soil Analytical Results for TPHLake Tapps Mini-Market SiteLake Tapps, WashingtonFarallon PN: 571-001

				Analytical Results (milligrams per kilogram)							
Sample Location	Sample Identification	Sample Depth (feet) ¹	Sample Date	GRO ²	Benzene ³	Toluene ³	Ethylbenzene ³	Xylenes ³	1,2-DCA ³	MTBE ³	Lead ⁴
B7	B-7-5	5.0	9/26/2005	< 2	< 0.02	< 0.02	< 0.02	< 0.06			
	FB-1-2.0	2.0	3/5/2009	7.3 T	0.082	0.079	< 0.069	< 0.138			
ED 1	FB-1-4.5	4.5	3/5/2009	8.1 T	0.40	< 0.074	< 0.074	0.214			
FB-1	FB-1-6.0	6.0	3/5/2009	<6.0	0.031	< 0.060	< 0.060	< 0.120			
	FB-1-12.0	12.0	3/5/2009	<4.3	< 0.020	< 0.043	< 0.043	< 0.086			
	MW-5-1.0	1.0	11/16/2005	120	ND	ND	ND	ND			
	MW-5-4	4.0	11/16/2005								< 1
MW-5	MW-5-7.5-8.0	7.5 - 8.0	11/16/2005	1,800							
	MW-5-11.5-12.0	11.5 - 12.0	11/16/2005	< 2	0.71	0.28	0.16	0.71		< 0.05	
	MW-5-12.5-13.0	12.5 - 13.0	11/16/2005	< 2	ND	ND	ND	ND	< 0.05		
MW 10	MW-10-18	17.5 - 18.0	7/11/2006	< 2	< 0.02	< 0.02	< 0.02	< 0.06			
IVI VV - 10	MW-10-26	25.5 - 26.0	7/11/2006	< 2	< 0.02	< 0.02	< 0.02	< 0.06			
	MW-11-2.0	2.0	3/5/2009	35 T	1.1	< 0.15	1.3	2.92			
MW-11	MW-11-4.5	4.5	3/5/2009	22 T	0.53	< 0.063	0.76	1.75			
	MW-11-17.0	17.0	3/5/2009	<5.4	< 0.020	< 0.054	< 0.054	< 0.108			
MW-12	MW-12-21.5	21.5	3/4/2009	<5.7	< 0.020	< 0.057	< 0.057	< 0.114			
MW-13	MW-13-10.5	10.5	3/4/2009	<4.9	< 0.020	< 0.049	< 0.049	< 0.098			
101 00 - 1.5	MW-13-22.5	22.5	3/4/2009	<4.9	< 0.020	< 0.049	< 0.049	< 0.098			
	2011 Excavation Confirmation Soil Samples										
					Grid Section A3	3			•		
A3-PS32	A3-PS32-SW-6.0	6.0	12/2/2011	<10	0.057	< 0.10	< 0.05	< 0.15			
A3-PS40	A3-PS40-SW-2.5	2.5	12/5/2011	<10	0.025	< 0.10	< 0.05	< 0.15			
A3-PS43	A3-PS43-B-4.5	4.5	12/5/2011	<10	0.028	< 0.10	< 0.05	< 0.15			
					Grid Section A4						
A4-PS16	A4-PS16-SW-2.0	2.0	11/30/2011	<10	0.074	< 0.10	< 0.05	< 0.15			
A4-PS17	A4-PS17-SW-7.0	7.0	11/30/2011	<10	< 0.02	< 0.10	< 0.05	< 0.15			
	-	1			Grid Section B2		,		T		
B2-PS41	B2-PS41-SW-3.0	3.0	12/5/2011	<10	< 0.02	< 0.10	< 0.05	< 0.15			
B2-PS42	B2-PS42-B-4.5	4.5	12/5/2011	<10	0.021	< 0.10	< 0.05	< 0.15			
		1	1		Grid Section B3	}	,		T		
B3-PS28	B3-PS28-SW-9.0	9.0	12/1/2011	<10	< 0.02	< 0.10	< 0.05	< 0.15			
B3-PS33	B3-PS33-B-9.0	9.0	12/2/2011	<10	0.55	< 0.10	< 0.05	0.58			
					Grid Section B4		1				
B4-PS12	B4-PS12-SW-2.0	2.0	11/30/2011	<10	< 0.02	< 0.10	< 0.05	0.24			
B4-PS13	B4-PS13-SW-6.5	6.5	11/30/2011	<10	< 0.02	< 0.10	< 0.05	< 0.15			
B4-PS26	B4-PS26-B-9.0	9.0	12/1/2011	<10	< 0.02	< 0.10	< 0.05	0.43			
					Grid Section C1						
C1-PS37	C1-PS37-SW-2.0	2.0	12/2/2011	<10	0.026	< 0.10	< 0.05	0.18			
					Grid Section C2	0.11		0.1-			
C2-PS36	C2-PS36-B-6.0	6.0	12/2/2011	<10	< 0.02	<0.10	<0.05	<0.15			
C2-PS44	C2-PS44-B-4.5	4.5	12/5/2011	<10	< 0.02	<0.10	< 0.05	<0.15			
MTCA Method A (Cleanup Levels for Soil ⁶			30/100'	0.03	7	6	9	11°	0.1	250

Table 3Soil Analytical Results for TPHLake Tapps Mini-Market SiteLake Tapps, WashingtonFarallon PN: 571-001

				Analytical Results (milligrams per kilogram)							
Sample Location	Sample Identification	Sample Depth (feet) ¹	Sample Date	GRO ²	Benzene ³	Toluene ³	Ethylbenzene ³	Xylenes ³	1,2-DCA ³	MTBE ³	Lead ⁴
					Grid Section C3	}					
C3-PS21-B-8.5	C3-PS21-B-8.5	8.5	12/1/2011	<10	< 0.02	<0.10	< 0.05	< 0.15			
					Grid Section C4	l.			· · ·		
C4-PS9	C4-PS9-SW-6.5	6.5	11/30/2011	<10	< 0.02	<0.10	< 0.05	< 0.15			
C4-PS10	C4-PS10-SW-2.0	2.0	11/30/2011	<10	< 0.02	< 0.10	< 0.05	< 0.15			
C4-PS11	C4-PS11-B-7.5	7.5	11/30/2011	<10	< 0.02	<0.10	< 0.05	< 0.15			
					Grid Section D1	_					
TP-4	TP-4-2.0	2.0	11/29/2011	22	0.48	< 0.10	0.15	1.96			
TP-4	TP-4-5.5	5.5	11/29/2011	<10	< 0.02	< 0.10	< 0.05	< 0.15			
D1-PS20	D1-PS20-SW-6.0	6.0	11/30/2011	<10	< 0.02	< 0.10	< 0.05	< 0.15			
D1-PS29	D1-PS29-SW-2.0	2.0	12/2/2011	<10	< 0.02	< 0.10	< 0.05	< 0.15			
D1-PS30	D1-PS30-SW-2.0	2.0	12/2/2011	<10	< 0.02	< 0.10	< 0.05	< 0.15			
					Grid Section D2	2					
D2-PS22	D2-PS22-B-8.0	8.0	12/1/2011	<10	< 0.02	<0.10	< 0.05	< 0.15			
					Grid Section D3	}					
TP-2	TP-2-2.0	2.0	11/29/2011	<10	< 0.02	< 0.10	< 0.05	< 0.15			
TP-2	TP-2-6.0	6.0	11/29/2011	<10	0.03	< 0.10	< 0.05	< 0.15			
TP-3	TP-3-2.0	2.0	11/29/2011	<10	< 0.02	< 0.10	< 0.05	< 0.15			
TP-3	TP-3-5.0	5.0	11/29/2011	<10	< 0.02	< 0.10	< 0.05	< 0.15			
D3-PS15	D3-PS15-B-7.0	7.0	11/30/2011	<10	< 0.02	< 0.10	< 0.05	< 0.15			
					Grid Section D4	ļ					
TP-1	TP-1-2.0	2.0	11/29/2011	<10	< 0.02	< 0.10	< 0.05	< 0.15			
TP-1	TP-1-4.5	4.5	11/29/2011	25	< 0.02	0.12	< 0.05	0.22			
TP-1	TP-1-6.0	6.0	11/29/2011	<10	< 0.02	<0.10	< 0.05	< 0.15			
D4-PS8	D4-PS8-B-8.0	8.0	11/30/2011	<10	< 0.02	<0.10	0.066	0.37			
D4-PS38	D4-PS38-SW-5.5	<10	< 0.02	< 0.10	< 0.05	< 0.15					
MTCA Method A G	Cleanup Levels for Soil ⁵			30/100⁶	0.03	7	6	9	117	0.1	250

NOTES:

Results in **bold** denote concentrations exceeding applicable cleanup levels.

< denotes analyte not detected at or exceeding the laboratory reporting limit listed.

— denotes sample not analyzed.

¹Depth in feet below ground surface.

²Analyzed by Northwest Method NWTPH-Gx.

³Analyzed by U.S. Environmental Protection Agency Method 8021B/8260B.

⁴Analyzed by U.S. Environmental Protection Agency Method 200.8.

⁵Washington State Model Toxics Control Act Cleanup Regulation (MTCA) Method A Soil Cleanup Levels for Unrestricted Land Uses, Table 740-1 of Section 900 of Chapter 173-340 of the Washington Administrative Code, as revised 2013.

⁶Cleanup level is 30 milligrams per kilogram if benzene is detected and 100 milligrams per kilogram if benzene is not detected.

⁷Washington State Cleanup Levels and Risk Calculations (CLARC) under Washington State MTCA, Standard Method B Formula Values for Soil from CLARC Master spreadsheet, https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Contamination-clean-up-tools/CLARC

1,2-DCA = 1,2-Dichloroethane (EDC)

GRO = TPH as gasoline-range organics

MTBE = Methyl tertiary-butyl ether

ND = not detected at or above an unknown reporting limit

T = the sample chromatogram is not similar to a typical gasoline

TPH = total petroleum hydrocarbons

limit cal gasoline

Table 4 Soil Analytical Results for HVOCs Lake Tapps Mini-Market Site Lake Tapps, Washington Farallon PN: 571-001

Boring / Well		Depth of Sample		Analytical Re	sults (milligrams pe	er kilograms) ²		
Location	Sample Identification	Sample Date	(feet) ¹	PCE	TCE	cis-1,2-DCE	trans-1,2-DCE	Vinyl Chloride
MW-5	MW-5-12.5-13.0	11/16/2005	12.5 - 13.0	< 0.05	< 0.03	< 0.05	< 0.05	< 0.05
MTCA Cleanup Le	evels for Soil			0.05 3	0.03 ³	160 ⁴	1,600 ⁴	0.67 4

NOTES:

< denotes analyte not detected at or above the reporting limit listed.

¹ Depth in feet below ground surface.

² Analyzed by U.S. Environmental Protection Agency Method 8260B.

³Washington State Model Toxics Control Act Cleanup Regulation (MTCA) Method A Soil Cleanup Level,

Table 740-1 of Section 900 of Chapter 173-340 of the Washington Administrative Code, as amended November 2007.

⁴Washington State Cleanup Levels and Risk Calculations under MTCA, Standard Method B, Non-carcinogenic,

Formula Values for Soil (Unrestricted Land Use) - Direct Contact (Ingestion Only) and Leaching Pathway,

https://fortress.wa.gov/ecy/clarc/Reporting/ChemicalQuery.aspx

cis-1,2-DCE = cis-1,2-dichlorethene

$$\label{eq:stable} \begin{split} HVOCs = halogenated volatile organic compounds \\ PCE = tetrachloroethene \\ TCE = trichloroethene \end{split}$$

trans-1,2-DCE = trans-1,2-dichlorethene

Table 5Groundwater Analytical Results for TPHLake Tapps Mini-Market SiteLake Tapps, WashingtonFarallon PN: 571-001

		Analytical Results (micrograms per liter)									
Sample Location	Sample Date	GRO ¹	Benzene ²	Toluene ²	Ethylbenzene ²	Total Xylenes ²	1,2-DBE ³	1,2-DCA ²	MTBE ²	Dissolved Lead ⁴	Total Lead ⁴
		•			Reconnaissance Grou	indwater Samples	P				
B7	9/26/2005	<100	<1.0	<1.0	<1.0	<3.0					
B8	9/26/2005	170	7	<1.0	<1.0	5					
B9	9/26/2005	1,000	290	3.5	3.6	31					
B10	9/26/2005	<500	<1.0	<1.0	<1.0	<1.0	< 1 ²	< 1			
					Monitoring Well Gro	undwater Samples					
	11/15/2005	<100	<1.0	<1.0	<1.0	<3.0					
	8/2/2006	<100	<1.0	<1.0	<1.0	<3.0					
	12/30/2006	<100	<1.0	<1.0	<1.0	<3.0					
	5/7/2008	<100	< 0.20	<1.0	<0.20	<0.60	< 0.0097	<0.20	< 0.20	<1.0	<1.1
MW 4	9/16/2009	<400	<4.0	<4.0	<4.0	<8.0					
101 00 -4	12/9/2009	<100	<1.0	<1.0	<1.0	<2.0					
	1/25/2012	<100	<1.0	<1.0	<1.0	<2.0					
	4/25/2012	<100	<1.0	<1.0	<1.0	<2.0					
	8/15/2012	<100	<1.0	<1.0	<1.0	<2.0					
	12/20/2012	<100	<1.0	<1.0	<1.0	<2.0					
	11/15/2005	250,000	42,000	57,000	4,600	25,300			< 100	<1	
	5/8/2008	320,000	50,000	66,000	4,600	25,300	< 0.0098	<1000	<1000	<1.0	2.4
MW-5 ⁵	3/25/2009	270,000	47,000	57,000	5,300	26,900					
	9/16/2009	260,000	40,000	55,000	4,200	23,200					
	12/10/2009	230,000	44,000	64,000	4,500	24,200					
	11/15/2005	<100	9	1	<1.0	<3.0					
	8/2/2006	<100	<1.0	1	<1.0	<3.0					
	12/30/2006	<100	<1.0	<1.0	<1.0	<3.0					
	5/7/2008	<100	0.67	<1.0	< 0.20	<0.60	< 0.0097	< 0.20	0.28	<1.0	<1.1
	3/24/2009	<100	<1.0	<1.0	<1.0	<2.0					
MW-6	9/16/2009	<100	<1.0	<1.0	<1.0	<2.0					
	12/9/2009	<100	<1.0	<1.0	<1.0	<2.0					
	1/25/2012	<100	<1.0	<1.0	<1.0	<2.0					
	4/25/2012	<100	<1.0	<1.0	<1.0	<2.0					
	8/15/2012	<100	<1.0	<1.0	<1.0	<2.0					
	12/20/2012	<100	<1.0	<1.0	<1.0	<2.0					
MTCA Method A Cl Groundwater ⁶	eanup Levels for	800/1,000 ⁷	5	1,000	700	1,000	0.01	5	20	5	15

Table 5Groundwater Analytical Results for TPHLake Tapps Mini-Market SiteLake Tapps, WashingtonFarallon PN: 571-001

		Analytical Results (micrograms per liter)									
Sample Location	Sample Date	GRO ¹	Benzene ²	Toluene ²	Ethylbenzene ²	Total Xylenes ²	1,2-DBE ³	1,2-DCA ²	MTBE ²	Dissolved Lead ⁴	Total Lead ⁴
	11/15/2005	<100	2	3	<1.0	4		< 1			
	8/2/2006	<100	<1.0	<1.0	<1.0	<3.0	< 1 ²	< 1	< 1		
	12/30/2006	<100	<1.0	<1.0	<1.0	<3.0					
	5/7/2008	<100	< 0.20	<1.0	< 0.20	< 0.60	< 0.0096	< 0.20	< 0.20	<1.0	<1.1
	3/25/2009	<100	<1.0	<1.0	<1.0	<2.0					
MW-7	9/16/2009	<400	<4.0	<4.0	<4.0	<8.0					
	12/9/2009	<100	<1.0	<1.0	<1.0	<2.0					
	1/25/2012	<100	1.1	<1.0	<1.0	<2.0					
	4/25/2012	<100	1.1	<1.0	<1.0	<2.0					
	8/15/2012	<100	<1.0	<1.0	<1.0	<2.0					
	12/20/2012	<100	1.5	<1.0	<1.0	<2.0					
	8/2/2006	<100	<1.0	2	<1.0	<3.0					
	12/30/2006	<100	<1.0	2	<1.0	<3.0					
	5/8/2008	<100	< 0.20	<1.0	< 0.20	< 0.60	< 0.0099	< 0.20	< 0.20	<1.0	<1.1
	3/24/2009	<100	<1.0	<1.0	<1.0	<2.0					
MW 10	9/16/2009	<100	<1.0	<1.0	<1.0	<2.0					
101 00 -10	12/10/2009	<100	<1.0	<1.0	<1.0	<2.0					
	1/25/2012	<100	<1.0	<1.0	<1.0	<2.0					
	4/25/2012	<100	<1.0	<1.0	<1.0	<2.0					
	8/15/2012	<100	<1.0	<1.0	<1.0	<2.0					
	12/20/2012	<100	<1.0	<1.0	<1.0	<2.0					
	3/24/2009	<100	2.3	<1.0	<1.0	<2.0					
MW-11 ⁵	9/15/2009	<100	<1.0	<1.0	<1.0	<2.0					
	12/10/2009	<100	<1.0	<1.0	1.7	15.7					
	3/24/2009	<100	<1.0	<1.0	<1.0	<2.0					
	9/15/2009	<100	<1.0	<1.0	<1.0	<2.0					
	12/10/2009	<100	<1.0	<1.0	<1.0	<2.0					
MW-12	1/25/2012	<100	<1.0	<1.0	<1.0	<2.0					
	4/25/2012	<100	<1.0	<1.0	<1.0	<2.0					
	8/16/2012	<100	<1.0	<1.0	<1.0	<2.0					
	12/20/2012	<100	<1.0	<1.0	<1.0	<2.0					
	3/24/2009	<100	<1.0	<1.0	<1.0	<2.0					
	9/15/2009	<100	<1.0	<1.0	<1.0	<2.0					
	12/10/2009	<100	<1.0	<1.0	<1.0	<2.0					
MW-13	1/25/2012	<100	<1.0	<1.0	<1.0	<2.0					
	4/25/2012	<100	<1.0	<1.0	<1.0	<2.0					
	8/15/2012	<100	<1.0	<1.0	<1.0	<2.0					
	12/20/2012	<100	<1.0	<1.0	<1.0	<2.0					
MTCA Method A Cl	eanup Levels for	000/1 0007	F	1 000	700	1 000	0.01	F	20	F	15
Groundwater ⁶		800/1,000	5	1,000	/00	1,000	0.01	5	20	5	15

Table 5 Groundwater Analytical Results for TPH Lake Tapps Mini-Market Site Lake Tapps, Washington Farallon PN: 571-001

		Analytical Results (micrograms per liter)									
Sample Location	Samule Date	GRO ¹	Benzene ²	Toluene ²	Ethylbenzene ²	Total Xylenes ²	1 2-DRF ³	$1.2 \cdot DCA^2$	MTBF ²	Dissolved Lead ⁴	Total Lead ⁴
Sample Location	1/25/2012	<100	15	<1.0	<1.0	<2.0	1,2-DDE	1,2-DCA		Dissolved Lead	Total Leau
	4/25/2012	<100	8.4	<1.0	<1.0	<2.0					
	8/15/2012	<100	<1.0	<1.0	<1.0	<2.0					
	12/20/2012	<100	<1.0	<1.0	<1.0	<2.0					
MW-18	8/27/2014	<100	<1.0	<1.0	<1.0	<2.0					
	11/24/2014	<100	<1.0	<1.0	<1.0	<2.0					
	2/25/2015	<100	<1.0	<1.0	<1.0	<2.0					
	5/26/2015	<100	<1.0	<1.0	<1.0	<2.0					
	1/25/2012	<100	<1.0	<1.0	<1.0	<2.0					
	4/25/2012	<100	<1.0	<1.0	<1.0	<2.0					
	8/15/2012	<100	<1.0	<1.0	<1.0	<2.0					
	12/20/2012	<100	<1.0	<1.0	<1.0	<2.0					
MW-19	8/27/2014	<100	<1.0	<1.0	<1.0	<2.0					
	11/24/2014	<100	<1.0	<1.0	<1.0	<2.0					
	2/25/2015	<100	<1.0	<1.0	<1.0	<2.0					
	5/26/2015	<100	<1.0	<1.0	<1.0	<2.0					
	1/25/2012	<100	<1.0	<1.0	<1.0	<2.0					
	4/25/2012	<100	3.7	<1.0	<1.0	<2.0					
	8/15/2012	<100	6.6	<1.0	<1.0	<2.0					
NUM 20	12/20/2012	<100	<1.0	<1.0	<1.0	<2.0					
IVI W -20	8/27/2014	<100	<1.0	<1.0	4.6	<2.0					
	11/24/2014	<100	<1.0	<1.0	<1.0	<2.0					
	2/25/2015	<100	<1.0	<1.0	<1.0	<2.0					
	5/26/2015	<100	<1.0	<1.0	<1.0	<2.0					
MTCA Method A Cl Groundwater ⁶	eanup Levels for	800/1,000 ⁷	5	1,000	700	1,000	0.01	5	20	15	

NOTES:

Results in **bold** denote concentrations exceeding applicable cleanup levels.

< denotes analyte not detected at or exceeding the reporting limit listed.

--- denotes sample not analyzed or data unknown.

¹ Analyzed by Northwest Method NWTPH-Gx.

² Analyzed by U.S. Environmental Protection Agency (EPA) Method 8021B or 8260B.

³ Analyzed by EPA Method 8011.

⁴ Analyzed by EPA Method 200.8.

⁵ Monitoring wells MW-5 and MW-11 were abandoned and removed during the Farallon excavation conducted on November 21, 2011.

⁶ Washington State Model Toxics Control Act Cleanup Regulation (MTCA) Method A Cleanup Levels for Groundwater, Table 720-1 in Section 900 of Chapter 173-340 of the Washington Administrative Code, as amended 2013.

⁷Cleanup level is 800 micrograms per liter if benzene is detected, and 1,000 micrograms per liter if benzene is not detected.

1,2-DBE = 1,2-dibromoethane 1,2-DCA = 1,2-dichloroethane GRO = total petroleum hydrocarbons as gasoline-range organics MTBE = methyl tertiary-butyl ether TPH = total petroleum hydrocarbons

Table 6 Groundwater Analytical Results for HVOCs Lake Tapps Mini-Market Site Lake Tapps, Washington Farallon PN: 571-001

		Analytical Results (micrograms per liter) ¹								
Sample Location	Sample Date	Tetrachloroethene	Trichloroethene	cis-1,2-DCE	1,1-DCE	trans-1,2- DCE	Vinyl Chloride	Trichlorofluoro- methane		
			Reconnaissa	nce Groundwater San	ıples					
B10	9/26/2005	<1.0	<1.0	<1.0	<1.0	<1.0	<0.2	< 1		
			Monitoring V	Vell Groundwater Sa	nples					
	11/21/2005	<1.0	<1.0	<1.0	<1.0	<1.0	< 0.20			
	8/2/2006	<1.0	<1.0	<1.0	<1.0	<1.1	<0.20	< 1		
MW-7	8/27/2014	<0.20	<0.20	<0.20	< 0.20	<0.20	< 0.20			
	5/26/2017	< 0.20	< 0.20	< 0.20		< 0.20	< 0.20			
	8/19/2019	<0.20	<0.20	< 0.20	< 0.20	<0.20	< 0.20			
MTCA Cleanup Le	vels for Groundwater ²	5	5	16³	400 ³	160 ³	0.2	NE		
MW 19	5/26/2017	<0.20	< 0.20	< 0.20		< 0.20	< 0.20			
101 00 - 10	8/28/2019	<0.20	< 0.20	< 0.20	< 0.20	< 0.20	<0.20			
	5/26/2017	< 0.20	< 0.20	0.30		< 0.20	0.28			
	8/28/2019	<0.20	<0.20	<0.20	< 0.20	<0.20	< 0.20			
MW-19	11/25/2019	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20			
	2/25/2020	< 0.20	<0.20	< 0.20	< 0.20	< 0.20	< 0.20			
	6/3/2020	<0.20	<0.20	< 0.20	< 0.20	< 0.20	< 0.20			
MTCA Cleanup Le	TCA Cleanup Levels for Groundwater ²		5	16 ³	400 ³	160 ³	0.2	2,400 ³		

NOTES:

Results in **bold** denote concentrations exceeding applicable cleanup levels.

< Denotes analyte not detected at or exceeding the reporting limit listed.

--- denotes sample not analyzed or data unknown.

¹ Analyzed by U.S. Environmental Protection Agency Method 8260B, 8260C, or 8260D.

² Washington State Model Toxics Control Act Cleanup Regulation (MTCA) Method A Groundwater Cleanup Levels, Table 720-1 of Section 900 of Chapter 173-340 of the Washington Administrative Code, as revised 2013 unless otherwise noted.

³MTCA Cleanup Levels and Risk Calculations, Standard Method B Values for Groundwater,

https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Contamination-clean-up-tools/CLARC

1,1-DCE = 1,1-dichloroethene

cis-1,2-DCE = cis-1,2-dichloroethene HVOCs = halogenated volatile organic compounds NE = not established trans-1,2-DCE = trans-1,2-dichloroethene

ATTACHMENT A TEE EVALUATION FORM

RESPONSE TO APRIL 1, 2021 ECOLOGY LETTER LAKE TAPPS MINI-MARKET 18215 9th Street East Lake Tapps, Washington

Farallon PN: 571-001



Voluntary Cleanup Program

Washington State Department of Ecology Toxics Cleanup Program

TERRESTRIAL ECOLOGICAL EVALUATION FORM

Under the Model Toxics Control Act (MTCA), a terrestrial ecological evaluation is necessary if hazardous substances are released into the soils at a Site. In the event of such a release, you must take one of the following three actions as part of your investigation and cleanup of the Site:

- 1. Document an exclusion from further evaluation using the criteria in WAC 173-340-7491.
- 2. Conduct a simplified evaluation as set forth in WAC 173-340-7492.
- 3. Conduct a site-specific evaluation as set forth in WAC 173-340-7493.

When requesting a written opinion under the Voluntary Cleanup Program (VCP), you must complete this form and submit it to the Department of Ecology (Ecology). The form documents the type and results of your evaluation.

Completion of this form is not sufficient to document your evaluation. You still need to document your analysis and the basis for your conclusion in your cleanup plan or report.

If you have questions about how to conduct a terrestrial ecological evaluation, please contact the Ecology site manager assigned to your Site. For additional guidance, please refer to www.ecy.wa.gov/programs/tcp/policies/terrestrial/TEEHome.htm.

Step 1: IDENTIFY HAZARDOUS WASTE SITE

Please identify below the hazardous waste site for which you are documenting an evaluation.

Facility/Site Name: Lake Tapps Mini Mart

Facility/Site Address: 18215 9th Street East, Sumner, Washington 98390

Facility/Site No: 2742912

VCP Project No.: SW0741

Step 2: IDENTIFY EVALUATOR

Please identify below the person who conducted the evaluation and their contact information.

Name: Emerald Erickson-M	ulanax			Title: Senior Geologist			
Organization: Farallon Consulting, L.L.C.							
Mailing address: 975 5 th Ave NW							
City: Issaquah State: WA Zip code: 98027							
Phone: 425-295-0825	Fax: 425-295-0850		E-mail: eericl	kson@farallonconsulting.com			

Step 3: DOCUMENT EVALUATION TYPE AND RESULTS							
A. Exclusion from further evaluation.							
1. Does the Site qualify for an exclusion from further evaluation?							
Yes If you answered " YES ," then answer Question 2 .							
No or Unknown If you answered "NO" or "UKNOWN," then skip to Step 3B of this form.							
2. What is the basis for the exclusion? Check all that apply. Then skip to Step 4 of this form.							
Point of Compliance: WAC 173-340-7491(1)(a)							
All soil contamination is, or will be,* at least 15 feet below the surface.							
All soil contamination is, or will be,* at least 6 feet below the surface (or alternative depth if approved by Ecology), and institutional controls are used to manage remaining contamination.							
Barriers to Exposure: WAC 173-340-7491(1)(b)							
All contaminated soil, is or will be,* covered by physical barriers (such as buildings or paved roads) that prevent exposure to plants and wildlife, and institutional controls are used to manage remaining contamination.							
Undeveloped Land: WAC 173-340-7491(1)(c)							
 There is less than 0.25 acres of contiguous[#] undeveloped[±] land on or within 500 feet of any area of the Site and any of the following chemicals is present: chlorinated dioxins or furans, PCB mixtures, DDT, DDE, DDD, aldrin, chlordane, dieldrin, endosulfan, endrin, heptachlor, heptachlor epoxide, benzene hexachloride, toxaphene, hexachlorobenzene, pentachlorophenol, or pentachlorobenzene. 							
\boxtimes For sites not containing any of the chemicals mentioned above, there is less than 1.5 acres of contiguous [#] undeveloped [±] land on or within 500 feet of any area of the Site.							
Background Concentrations: WAC 173-340-7491(1)(d)							
Concentrations of hazardous substances in soil do not exceed natural background levels as described in WAC 173-340-200 and 173-340-709.							
* An exclusion based on future land use must have a completion date for future development that is acceptable to Ecology.							
[±] "Undeveloped land" is land that is not covered by building, roads, paved areas, or other barriers that would prevent wildlife from feeding on plants, earthworms, insects, or other food in or on the soil.							
[#] "Contiguous" undeveloped land is an area of undeveloped land that is not divided into smaller areas of highways, extensive paving, or similar structures that are likely to reduce the potential use of the overall area by wildlife.							

B	. Simplified	implified evaluation.									
1.	Does the S	ite qualify for a simplified evaluation?									
	☐ Ye	es If you answered "YES," then answer Question 2 below.									
	🗌 No Unkno	o or wn If you answered " NO " or " UNKNOWN ," then skip to Step 3C of this form.									
2.	Did you co	nduct a simplified evaluation?									
	🗌 Ye	es If you answered "YES," then answer Question 3 below.									
		If you answered " NO," then skip to Step 3C of this form.									
3.	Was furthe	r evaluation necessary?									
	🗌 Ye	es If you answered "YES," then answer Question 4 below.									
		lf you answered "NO," then answer Question 5 below.									
4.	If further ev	valuation was necessary, what did you do?									
		Used the concentrations listed in Table 749-2 as cleanup levels. <i>If so, then skip to</i> Step 4 of this form.									
		Conducted a site-specific evaluation. If so, then skip to Step 3C of this form.									
5.	If no furthe to Step 4 of	r evaluation was necessary, what was the reason? Check all that apply. Then skip this form.									
	Exposure A	nalysis: WAC 173-340-7492(2)(a)									
		Area of soil contamination at the Site is not more than 350 square feet.									
		Current or planned land use makes wildlife exposure unlikely. Used Table 749-1.									
	Pathway Ar	nalysis: WAC 173-340-7492(2)(b)									
		No potential exposure pathways from soil contamination to ecological receptors.									
	Contaminar	nt Analysis: WAC 173-340-7492(2)(c)									
		No contaminant listed in Table 749-2 is, or will be, present in the upper 15 feet at concentrations that exceed the values listed in Table 749-2.									
		No contaminant listed in Table 749-2 is, or will be, present in the upper 6 feet (or alternative depth if approved by Ecology) at concentrations that exceed the values listed in Table 749-2, and institutional controls are used to manage remaining contamination.									
		No contaminant listed in Table 749-2 is, or will be, present in the upper 15 feet at concentrations likely to be toxic or have the potential to bioaccumulate as determined using Ecology-approved bioassays.									
		No contaminant listed in Table 749-2 is, or will be, present in the upper 6 feet (or alternative depth if approved by Ecology) at concentrations likely to be toxic or have the potential to bioaccumulate as determined using Ecology-approved bioassays, and institutional controls are used to manage remaining contamination.									

C.	Site-specific evaluation. A site-specific evaluation process consists of two parts: (1) formulating the problem, and (2) selecting the methods for addressing the identified problem. Both steps require consultation with and approval by Ecology. <i>See</i> WAC 173-340-7493(1)(c).				
1.	Was there a problem? See WAC 173-340-7493(2).				
		Yes If you answered " YES ," then answer Question 2 below.			
		No If you answered " NO ," then identify the reason here and then skip to Que below:	estion 5		
		No issues were identified during the problem formulation step			
		While issues were identified, those issues were addressed by cleanup actions for protecting human health.	the		
2.	What did	I you do to resolve the problem? See WAC 173-340-7493(3).			
		Used the concentrations listed in Table 749-3 as cleanup levels. <i>If so, then sk Question 5 below.</i>	ip to		
		Used one or more of the methods listed in WAC 173-340-7493(3) to evaluate a address the identified problem. <i>If so, then answer Questions 3 and 4 below</i> .	and		
3.	. If you conducted further site-specific evaluations, what methods did you use? Check all that apply. See WAC 173-340-7493(3).				
		Literature surveys.			
		Soil bioassays.			
		Wildlife exposure model.			
		Biomarkers.			
		Site-specific field studies.			
		Weight of evidence.			
		Other methods approved by Ecology. If so, please specify:			
4.	What was the result of those evaluations?				
		Confirmed there was no problem.			
		Confirmed there was a problem and established site-specific cleanup levels.			
5.	Have you already obtained Ecology's approval of both your problem formulation and problem resolution steps?				
		Yes If so, please identify the Ecology staff who approved those steps:			
		Νο			

Step 4: SUBMITTAL

Please mail your completed form to the Ecology site manager assigned to your Site. If a site manager has not yet been assigned, please mail your completed form to the Ecology regional office for the County in which your Site is located.

Northwest Region:	Central Region:
Attn: VCP Coordinator	Attn: VCP Coordinator
3190 160 th Ave. SE	1250 West Alder St.
Bellevue, WA 98008-5452	Union Gap, WA 98903-0009
Southwest Region:	Eastern Region:
Attn: VCP Coordinator	Attn: VCP Coordinator
P.O. Box 47775	N. 4601 Monroe
Olympia, WA 98504-7775	Spokane WA 99205-1295



ECY 090-300 (07/2015) To request ADA accommodation including materials in a format for the visually impaired, call Ecology Toxic Cleanup Program 360-407-7170. Persons with impaired hearing may call Washington Relay Service at 711. Persons with speech disability may call TTY at 877-833-6341.



Table 749-1

Simplified Terrestrial Ecological Evaluation-Exposure Analysis Procedure

Estimate the area of contiguous (connected) <u>undeveloped land</u> on the site or within 500 area of the site to the nearest 1/2 acre (1/4 acre if the area is less than 0.5 acre).) feet of any
1) From the table below, find the number of points corresponding to the area and enter this number in the field to the right.	
Area (acres) Points 0.25 or less 4 0.5 5 1.0 6 1.5 7 2.0 8 2.5 9 3.0 10 3.5 11 4.0 or more 12	6
2) Is this an <u>industrial</u> or <u>commercial</u> property? If yes, enter a score of 3. If no, enter a score of 1	1
$(3)^{a}$ Enter a score in the box to the right for the habitat quality of the site, using the following rating system ^b . High=1, Intermediate=2, Low=3	1
4) Is the undeveloped land likely to attract wildlife? If yes, enter a score of 1 in the box to the right. If no, enter a score of 2° .	2
5) Are there any of the following soil contaminants present: Chlorinated dioxins/furans, PCB mixtures, DDT, DDE, DDD, aldrin, chlordane, dieldrin, endosulfan, endrin, heptachlor, benzene hexachloride, toxaphene, hexachlorobenzene, pentachlorophenol, pentachlorobenzene? If yes, enter a score of 1 in the box to the right. If no, enter a score of 4.	4
6) Add the numbers in the boxes on lines 2-5 and enter this number in the box to the right. If this number is larger than the number in the box on line 1, the simplified evaluation may be ended.	8

Notes for Table 749-1

^a It is expected that this habitat evaluation will be undertaken by an experienced field biologist. If this is not the case, enter a conservative score of (1) for questions 3 and 4.

^b **Habitat rating system.** Rate the quality of the habitat as high, intermediate or low based on your professional judgment as a field biologist. The following are suggested factors to consider in making this evaluation:

Low: Early <u>successional</u> vegetative stands; vegetation predominantly noxious, nonnative, exotic plant species or weeds. Areas severely disturbed by human activity, including intensively cultivated croplands. Areas isolated from other habitat used by wildlife.

High: Area is ecologically significant for one or more of the following reasons: Late-<u>successional</u> native plant communities present; relatively high species diversity; used by an uncommon or rare species; <u>priority habitat</u> (as defined by the Washington Department of fish and Wildlife); part of a larger area of habitat where size or fragmentation may be important for the retention of some species.

Intermediate: Area does not rate as either high or low.

^c Indicate "yes" if the area attracts wildlife or is likely to do so. Examples: Birds frequently visit the area to feed; evidence of high use b mammals (tracks, scat, etc.); habitat "island" in an industrial area; unusual features of an area that make it important for feeding animals; heavy use during seasonal migrations.

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