State of Washington
POLLUTION LIABILITY INSURANCE AGENCY
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March 29, 2022

Mr. Mark Benezra
Buffalo Investments
7979 S 180th St.
Kent, WA 98032

Re: No Further Action at the Following Site:

- **Facility/Site (owner) Name:** 3420 E Marginal Way South
- **Facility/Site Address:** 3420 E Marginal Way South, Seattle, WA 98134
- **Facility Site ID (TAP only):** 66253
- **Technical Assistance Program No.:** PNW183

Dear Mr. Benezra:

The Washington State Pollution Liability Insurance Agency (PLIA) received a request for an opinion on your independent cleanup of 3420 E Marginal Way South, Seattle, WA 98134 (Site). This letter provides our opinion. Opinions by PLIA are made under the authority of Chapter 70A.330 RCW and Chapter 374-80 WAC. PLIA appreciates your initiative in pursuing this administrative option for cleaning up a contaminated site under the Model Toxics Control Act (MTCA), Chapter 70A.305 RCW.

Issue Presented and Opinion

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

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

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

Description of the Site

This opinion applies only to the Site located at 3420 E Marginal Way South, Seattle, WA 98134 and comprises one King County tax parcel described below. This opinion does not apply to any other hazardous substance release(s) that may affect the Property (parcels).

1. Description of the Site:

The Site is defined by the nature and extent of contamination associated with the following release(s):

- Total petroleum hydrocarbons (TPH): TPH-d (diesel), TPH-o (oil) and TPH-g (gasoline) into the soil/groundwater/air.
- Volatile organic compounds: benzene, toluene, ethylbenzene and total xylenes (BTEX), and potentially naphthalene into the soil/groundwater/air.

The following parcel(s) have been impacted by the release(s):

- King County Parcel No. 7666207580

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

Please note that a parcel of real property can be affected by multiple sites. The Property is reportedly affected by a non-point source unrelated to and separate from the Site detailed above. The non-point source affecting the Property is believed to be associated with contaminated fill, which is common to the Lower Duwamish Waterway area in which the Property is located. At this time, no data have indicated that contamination from this non-point source is co-mingled with Site contaminants of concern (COCs) and remains within the boundaries of the Site described above.

Basis of the Opinion

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

1. *Request for Opinion Letter on Confirmational Groundwater Monitoring* – 3420 East Marginal Way South, Seattle, Washington. Prepared by Farallon Consulting, October 21, 2021.
2. *Remedial Investigation/Feasibility Study Report – 3420 East Marginal Way South, Seattle, Washington*. Prepared by Farallon Consulting, May 20, 2020.
3. *Limited Phase II Subsurface Investigation Report – 3420 & 3430 East Marginal Way South, Seattle, Washington*. Prepared by AEI Consultants, October 18, 2019.

4. *Phase I Environmental Site Assessment Report – 3420 and 3430 East Marginal Way South and 3401 Colorado Avenue South, Seattle, Washington*. Prepared by Farallon Consulting, May 30, 2018.

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

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

Establishment of Cleanup Standards and Points of Compliance

PLIA has determined the cleanup levels (CULs) and points of compliance (POCs) you established for the Site meet the substantive requirements of MTCA. It is presumed that if you meet the cleanup standards under MTCA, the Site will be protective of human health and the environment for current and future property use.

1. CULs:

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

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

*When Benzene is present.

Table 2. The proposed air cleanup levels are:

Contaminants of Concern (COCs)	**Method B** Sub-Slab/Soil Gas Screening Levels ug/m^3	**Method B** Indoor/Air Cleanup Levels ug/m^3
Benzene (carcinogen)	10.7	0.321
Toluene	15,600	2,290
Ethylbenzene	15,200	457
Xylene	310	45.7
Total Lead	-	-
Naphthalene (carcinogen) (does not include 1-methyl	2.45	0.0735

and 2-methyl naphthalene)		
Total Petroleum Hydrocarbon (TPH)	4,700*	140
APH [EC5-8 Aliphatics]	90,000	2,700
APH [EC9-12 Aliphatics]	4,700	140
APH [EC9-10 Aromatics]	6,000	180

* Based on the current attenuation factor of 0.03.

2. POCs:

The proposed CULs must be met at the following POCs:

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

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

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

Analysis of the Cleanup

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

1. History and Characterization of the Site

PLIA has determined your characterization of the Site **was** sufficient to establish cleanup standards and select a cleanup action. The Site is described in the documents cited above and shown in Figures 1, 2, and 3.

Conceptual Site Model (Exposure Pathways)

A conceptual site model is a description of how contamination at the Site can potentially come into contact with, and impact, a human or other ecological receptor.

i. Soil Direct Contact:

- Petroleum contaminated soil (PCS) at the Site was reportedly associated with a former 1,000-gallon underground storage tank which was located on the northwestern portion of the Property beginning in 1949 (Figure 2). PCS was detected above MTCA Method A CULs in the form of TPH-o and benzene within the depths (0' to 15' below ground surface [bgs]) that humans are most likely to come into contact (Table 1).

  Result: The direct contact exposure pathway existed at this Site. This means that PCS was in a place underground where it was likely that a human may come into contact with it when working (e.g., digging for a buried utility line).

ii. Groundwater:

- A total of four groundwater monitoring wells were installed at the Site. Groundwater flow direction was determined to be generally east-southeast. No COCs were detected above MTCA Method A CULs in four groundwater monitoring wells installed to assess groundwater conditions at the Site (Figure 2).

  Result: The soil to groundwater exposure pathway existed at this Site. This means that PCS may come into contact with, and leach Site COCs into, groundwater that may be used for drinking water purposes.

iii. Air (Soil or Groundwater to Vapor):

- A warehouse building footprint is within the lateral inclusion zone (30') and vertical separation distance (15') of historical petroleum related detections above MTCA Method A CULs (Figure 2).

  Result: The air exposure pathway existed at this Site. This means that petroleum contamination underground may give off harmful vapors that could enter nearby commercial or residential structures.

iv. Surface Water:

- The nearest surface water is the Duwamish Waterway which is located approximately 1000' west of this Site.

  Result: The surface water exposure pathway did not exist at this Site. At this time, data does not suggest that surface water may be at risk

for being impacted. This means that petroleum contamination has not spread to surface water.

Selection of Cleanup Action:

The conceptual site model (Section 1: i-iv above) details which exposure pathways existed prior to conducting cleanup activities at the Site. Cleanup actions performed at the Site must adequately address all known exposure pathways of concern in order to satisfy the substantive requirements of MTCA. Cleanup actions taken, along with their effect on any known exposure pathways, are described in Section 2.

2. Cleanup of the Site:

PLIA has determined that the cleanup action(s) you performed meet(s) cleanup standards established for the Site. The following cleanup actions have been completed at the Site:

i. Soil:

- Excavation and disposal of 61.3 tons of PCS during an interim action excavation in February 2020.
- Confirmation soil sampling was performed to determine if all PCS above MTCA Method A CULs had been removed from the Site (Table 2).

Result: **The data indicate there is no longer an unacceptable risk of exposure from the soil direct contact exposure pathway at the Site.** The remedial action(s) removed the potential for soil with concentrations of petroleum above CULs to come into contact with humans or ecological receptors.

ii. Groundwater:

- The soil remedial action, subsequent confirmation soil sampling, and the installation and sampling of four groundwater monitoring wells served to close the soil leaching to groundwater exposure pathway. The groundwater data from Site monitoring wells indicates that all contaminants of concern are below CULs at the Site.

Result: The data indicate there is no longer an unacceptable risk of exposure from the groundwater exposure pathway at this Site. The remedial action removed the potential for PCS above the CULs to come into contact with, and leach into, groundwater at the Site.

iii. Air (Soil or Groundwater to Vapor):

- Because soil and groundwater have been remediated to below MTCA Method A CULs at the Site, the soil or groundwater to vapor exposure pathway is considered to be closed.

Result: The data indicate there is no longer an unacceptable risk of exposure from the soil or groundwater to vapor exposure pathway at this Site. The remedial action removed the potential for contaminated soil or groundwater to give off harmful vapors that could enter nearby commercial or residential structures.

Limitations of the Opinion

1. Opinion does not settle liability with the state.

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

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

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

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

To recover remedial action costs from other liable persons under the MTCA, one must demonstrate that the action is the substantial equivalent of an Ecology-conducted or Ecology-supervised action. This opinion does not determine whether the action you performed is equivalent. Courts make that determination (RCW 70A.305.080 and WAC 173-340-545).

3. State is immune from liability.

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

Termination of Agreement

Thank you for choosing to cleanup your Site under the PLIA Technical Assistance Program. This opinion terminates Project No. PNW183.

Contact Information

Thank you for choosing to clean up your Site in coordination with the PLIA Technical Assistance Program (TAP). If you have any questions about this opinion, please contact us by phone at 1-800-822-3905, or by email at pliamail@plia.wa.gov.

Sincerely,

DocuSigned by:
Justin Woerth
37703CDC1AC84D4...

State of Washington
21035012
Licensed Geologist
Justin Woerth

DocuSigned by:
Ulysses Cooley Jr.
569D5AC8B883494...

State of Washington
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Justin Woerth, L.G.
Site Manager

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Hydrogeologist

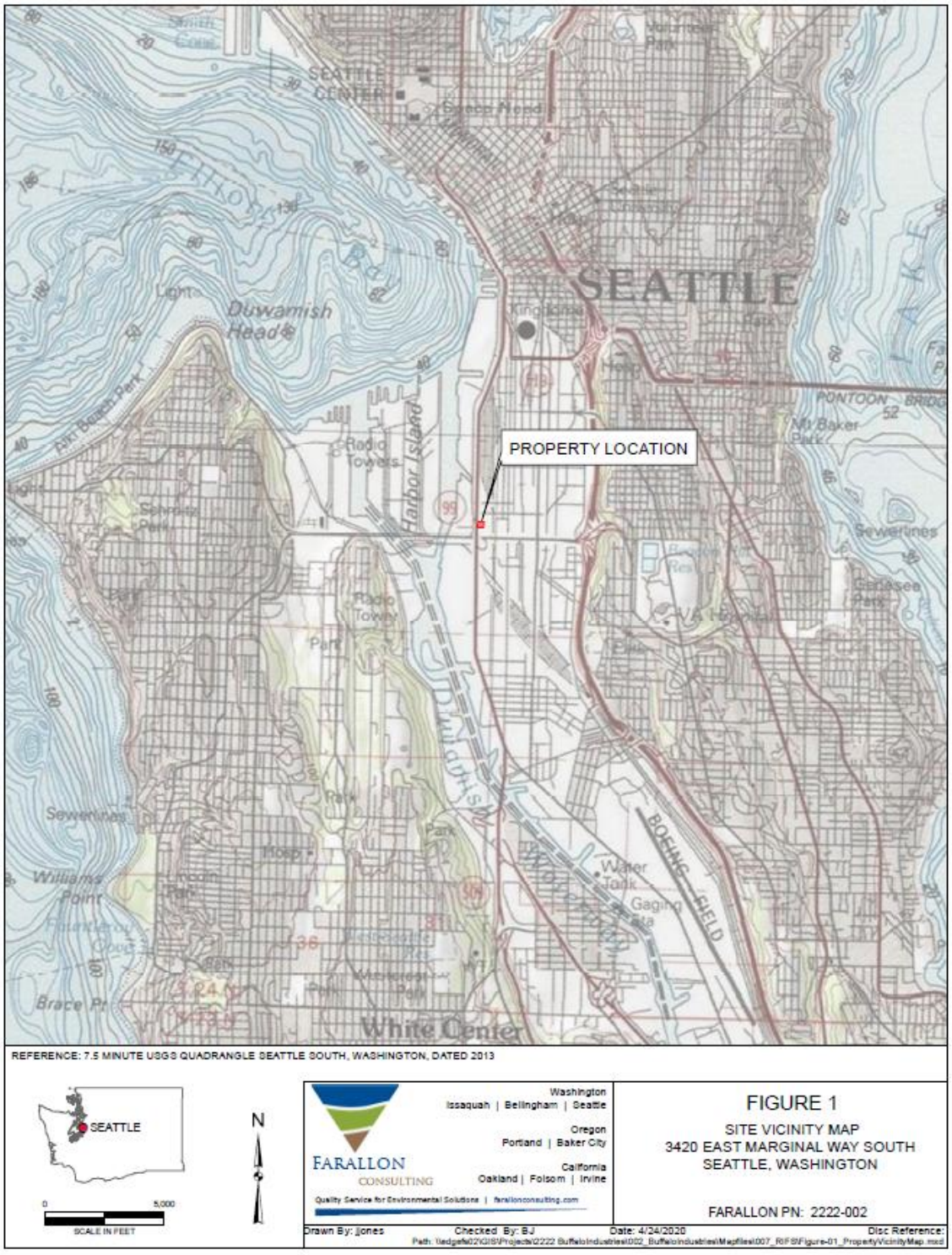
Enclosure A: Figure 1: Vicinity Map
Figure 2: Soil Excavation Map
Figure 3: Groundwater Monitoring Network Map
Table 1: Soil Data
Table 2: Groundwater Data

cc: Mr. Branislav Jurista, Farallon Consulting (by email)
Ms. Kristin Evered, PLIA (by email)
Ms. Carrie Pederson, PLIA (by email)
Mr. Tyler Betz, PLIA (by email)

Enclosure A:

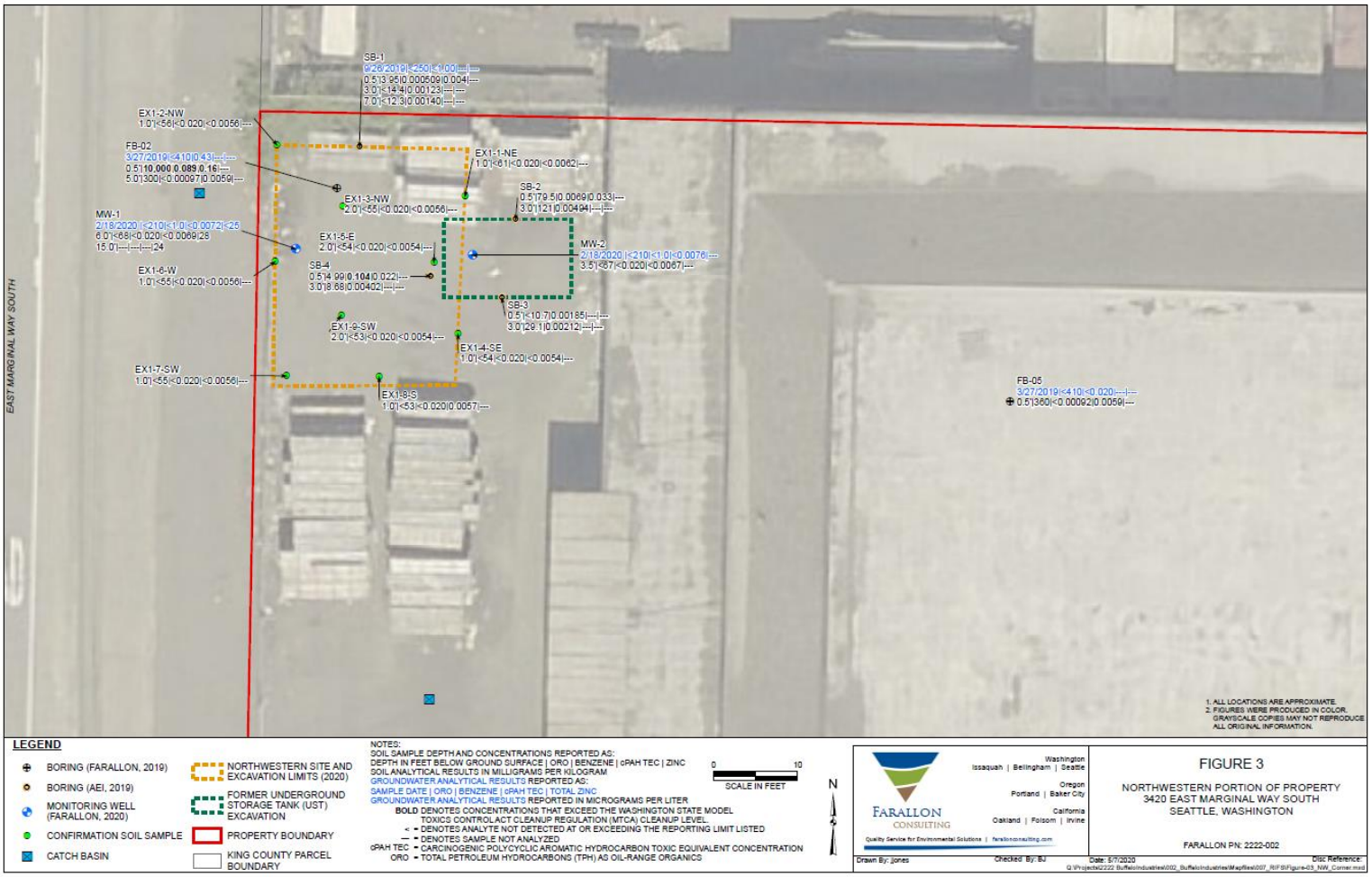
3420 E Marginal Way South Site
TAP Project No. PNW183

Figure 1: Vicinity Map



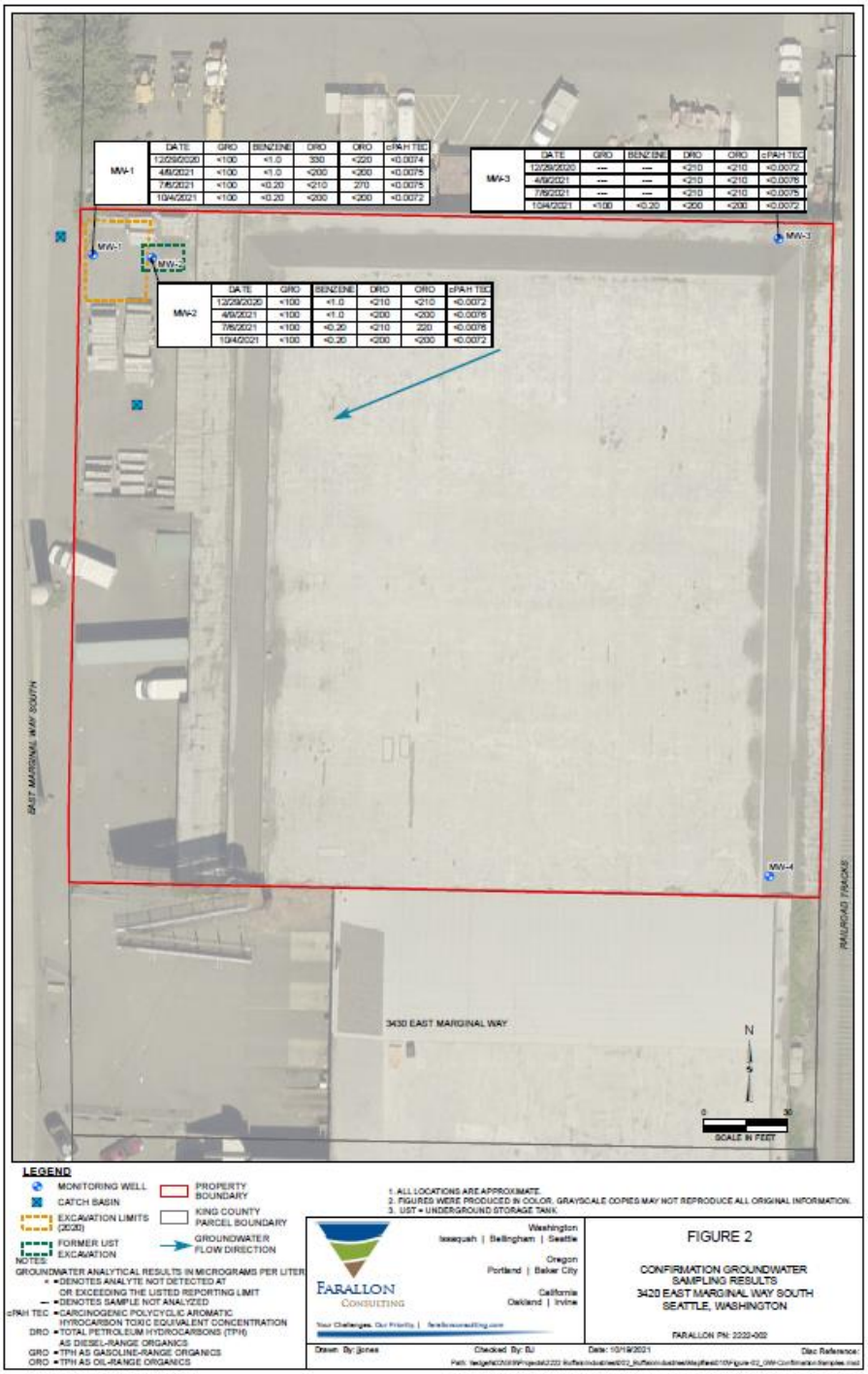
Source: *Request for Opinion Letter on Confirmational Groundwater Monitoring*, Farallon Consulting, 2021.

Figure 2: Soil Excavation Map



Source: *Remedial Investigation/ Feasibility Study Report*, Farallon Consulting, 2020.

Figure 3: Groundwater Monitoring Network Map



Source: *Request for Opinion Letter on Confirmational Groundwater Monitoring*, Farallon Consulting, 2021.

Table 1: Soil Data

Table 1
Soil Sample Analytical Results
3420 East Marginal Way South
Seattle, Washington
Farallon PN: 2222-002

Sample Location	Sampled By	Sample Identification	Sample Depth (feet)[1]	Sample Date	Analytical Results (milligrams per kilogram)									Analytical Results (percent)	Klozur CR Consumption/Soil Oxidant Demand (grams persulfate per kilogram dry soil)	
					GRO[2]	Benzene[3]	Toluene[3]	Ethylbenzene[3]	Xylenes[3]	DRO[4]	ORO[4]	Total cPAH TEC[5]	Zinc[6]	Total Organic Carbon[7]	48 Hours[8]	168 hours[8]
Borings																
FB-02	Farallon	FB-02-0.5-032719	0.5	3/27/2019	< 5.1	**0.089**	0.045	0.0020	0.026	< 300	**10,000**	**0.16**	---	---	---	---
	Farallon	FB-02-5.0-032719	5.0	3/27/2019	---	< 0.00097	---	---	---	---	300	0.0059	---	---	---	---
FB-03	Farallon	FB-03-8.0-032719	8.0	3/27/2019	< 5.7	< 0.00097	0.011	< 0.00097	< 0.0029	< 29	< 58	< 0.0058	---	---	---	---
FB-04	Farallon	FB-04-7.0-032719	7.0	3/27/2019	< 6.3	< 0.0010	0.0067	< 0.0010	< 0.0031	< 30	< 61	< 0.0061	---	---	---	---
FB-05	Farallon	FB-05-0.5-032719	0.5	3/27/2019	< 5.2	< 0.00092	0.0098	< 0.00092	< 0.0027	< 27	360	0.0059	---	---	---	---
FB-14	Farallon	FB-14-14.5	14.5	3/9/2020	---	---	---	---	---	---	---	< 0.0063	---	0.452 B,C	---	---
	Farallon	FB-14-15.1	15.1	3/9/2020	---	---	---	---	---	---	---	**0.21**	---	---	---	---
	Farallon	FB-14-20.0	20.0	3/9/2020	---	---	---	---	---	---	---	0.025	---	---	---	---
FB-15	Farallon	FB-15-15.1	15.1	3/9/2020	---	---	---	---	---	---	---	< 0.0062	---	---	---	---
FB-16	Farallon	FB-16-15.1	15.1	3/9/2020	---	---	---	---	---	---	---	0.021	---	---	---	---
FB-18	Farallon	FB-18-14.5	14.5	3/9/2020	---	---	---	---	---	---	---	< 0.0069	---	0.214 B,C	---	---
	Farallon	FB-18-20.0	20.0	3/9/2020	---	---	---	---	---	---	---	< 0.0063	---	---	---	---
FB-19	Farallon	FB-19-17.4	17.4	3/9/2020	---	---	---	---	---	---	---	< 0.0062	---	---	---	---
MW-1	Farallon	MW1-6.0	6.0	2/13/2020	< 8.9	< 0.020	< 0.089	< 0.089	---	< 34	< 68	< 0.0069	28	---	---	---
	Farallon	MW1-15.0	15.0	2/13/2020	---	---	---	---	---	---	---	---	24	---	---	---
MW-2	Farallon	MW2-3.5-DISP	3.5	2/13/2020	< 8.0	< 0.020	< 0.080	< 0.080	< 0.16	< 33	< 67	< 0.0067	---	---	---	---
MW-3	Farallon	MW3-4.5	4.5	2/13/2020	< 6.5	< 0.020	< 0.065	< 0.065	< 0.13	170 N	970	0.037	---	---	---	---
	Farallon	MW3-7.5	7.5	2/13/2020	---	---	---	---	---	---	---	< 0.0063	---	---	---	---
	Farallon	MW3-15.0	15.0	2/13/2020	< 7.7	< 0.020	< 0.077	< 0.077	< 0.154	< 32	< 64	**3.0**	---	---	---	---
MW-4	Farallon	MW4-13.0	13.0	2/13/2020	< 6.8	< 0.020	< 0.068	< 0.068	< 0.136	< 30	< 59	< 0.0060	---	---	---	---
	Farallon	MW4-20.0	20.0	2/13/2020	< 6.6	< 0.020	< 0.066	< 0.066	< 0.132	< 33	< 66	< 0.0066	---	---	---	---
SB-1	AEI	SB-1-0.5	0.5	9/26/2019	---	0.000509 J	0.00437 J	0.000938 J	0.00550 J	< 4.16	3.95 J	0.004	---	---	---	---
	AEI	SB-1-3.0	3.0	9/26/2019	---	0.00123 J	0.00383 J	< 0.00360	< 0.00936	< 5.76	< 14.4	---	---	---	---	---
	AEI	SB-1-7.0	7.0	9/26/2019	---	0.00140 J	0.00637 J	0.000943 J	< 0.00909	< 4.91	< 12.3	---	---	---	---	---
SB-2	AEI	SB-2-0.5	0.5	9/26/2019	---	0.0069	0.00782	0.000985 J	< 0.00854	8.75	79.5	0.033	---	---	---	---
	AEI	SB-2-3.0	3.0	9/26/2019	---	0.00494	0.00827	0.00200 J	< 0.00965	19.6	121	---	---	---	---	---
SB-3	AEI	SB-3-0.5	0.5	9/26/2019	---	0.00185	0.00757	0.000847 J	0.00813	< 4.29	< 10.7	---	---	---	---	---
	AEI	SB-3-3.0	3.0	9/26/2019	---	0.00212	0.00556 J	< 0.00347	< 0.00664	11.5	29.1	---	---	---	---	---
SB-4	AEI	SB-4-0.5	0.5	9/26/2019	---	**0.104**	0.0482	0.00268	0.0252	< 4.26	4.99 J	0.022	---	---	---	---
	AEI	SB-4-3.0	3.0	9/26/2019	---	0.00402	0.0112	0.00693	0.0126	1.94 J	8.68 J	---	---	---	---	---
Excavation Confirmation																
EX1-1-NE	Farallon	EX1-1-NE-1.0-SW	1.0	2/6/2020	< 7.6	< 0.020	< 0.076	< 0.076	< 0.152	< 31	< 61	< 0.0062	---	---	---	---
EX1-2-NW	Farallon	EX1-2-NW-1.0-SW	1.0	2/6/2020	< 6.7	< 0.020	< 0.067	< 0.067	< 0.134	< 28	< 56	< 0.0056	---	---	---	---
EX-1-3-NW	Farallon	EX1-3-NW-2.0-B	2.0	2/6/2020	< 5.9	< 0.020	< 0.059	< 0.059	< 0.118	< 28	< 55	< 0.0056	---	---	---	---
EX-1-4-SE	Farallon	EX1-4-SE-1.0-SW	1.0	2/6/2020	< 5.7	< 0.020	< 0.057	< 0.057	< 0.114	< 27	< 54	< 0.0054	---	---	---	---
EX1-5-E	Farallon	EX1-5-E-2.0-B	2.0	2/6/2020	< 5.7	< 0.020	< 0.057	< 0.057	< 0.114	< 27	< 54	< 0.0054	---	---	---	---
EX1-6-W	Farallon	EX1-6-W-1.0-SW	1.0	2/6/2020	< 6.6	< 0.020	< 0.066	< 0.066	< 0.132	< 28	< 55	< 0.0056	---	---	---	---
EX1-7-SW	Farallon	EX1-7-SW-1.0-SW	1.0	2/6/2020	< 5.8	< 0.020	< 0.058	< 0.058	< 0.116	< 28	< 55	< 0.0056	---	---	---	---
EX1-8-S	Farallon	EX1-8-S-1.0-SW	1.0	2/6/2020	< 5.3	< 0.020	< 0.053	< 0.053	< 0.106	< 26	< 53	0.0057	---	---	---	---
EX1-9-SW	Farallon	EX1-9-SW-2.0-B	2.0	2/6/2020	< 5.6	< 0.020	< 0.056	< 0.056	< 0.112	< 26	< 53	< 0.0054	---	---	---	---
MTCA Method A Cleanup Levels for Soil[9]					**30/100[10]**	**0.03**	**7**	**6**	**9**	**2,000**	**2,000**	**0.1**	**24,000[11]**	**NE**	**NA**	**NA**
Composite Samples																
FB-14 / FB-18 / FB-15	Farallon	Composite of: FB-14-14.5 FB-18-14.5 FB-15-15.1	14.5 to 15.1	3/9/2020	---	---	---	---	---	---	---	---	---	---	6.39	10.25

NOTES:
Results in **bold** and highlighted yellow denote concentrations exceeding applicable cleanup levels.
< denotes analyte not detected at or exceeding the laboratory reporting limit listed.
--- denotes sample not analyzed.
[1]Depth in feet below ground surface.
[2]Analyzed by Northwest Method NWTPH-Gx.
[3]Analyzed by U.S. Environmental Protection Agency Method 8021B or 8260B.
[4]Analyzed by Northwest Method NWTPH-Dx.
[5]Analyzed by U.S. Environmental Protection Agency (EPA) Method 8270E/SIM.
[6]Analyzed by EPA Method 6010D.
[7]Analyzed by EPA Method 9060.
[8]Analyzed by Klozur persulfate demand test methodology.
[9]Washington 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, unless otherwise noted.
[10]Cleanup level is 30 milligrams per kilogram if benzene is detected, and 100 milligrams per kilogram if benzene is not detected.
[11]Washington State Department of Ecology Cleanup Levels and Risk Calculations, under MTCA Standard Method B Formula Values for Soil (Unrestricted Land Use) - Direct Contact (Ingestion Only) and Leaching Pathway, https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Contamination-clean-up-tools/CLARC

AEI = AEI Consultants
B = analyte detected in the associated method blank
C = value is not with established laboratory control limits
cPAHs = carcinogenic polycyclic aromatic hydrocarbons
DRO = total petroleum hydrocarbons (TPH) as diesel-range organics
Farallon = Farallon Consulting, L.L.C.
GRO = TPH as gasoline-range organics
J = result is an estimate
N = hydrocarbons in the lube-oil range are impacting the diesel-range result
NA = not applicable
NE = not established
ORO = TPH as oil-range organics
TEC = toxic equivalent concentration

Source: *Remedial Investigation/Feasibility Study Report*, Farallon Consulting, 2020.

Table 2: Groundwater Data

Table 2
Groundwater Sample Analytical Results
3420 East Marginal Way South
Seattle, Washington
Farallon PN: 2222-002

Sample Location	Sampled By	Sample Date	Sample Identification	Analytical Results (micrograms per liter)								
				GRO[1]	Benzene[2]	Toluene[2]	Ethylbenzene[2]	Xylenes[2]	DRO[3]	ORO[3]	Total cPAHs TEC[4,5]	Zinc[6]
Monitoring Well Groundwater Samples												
MW-1	Farallon	2/18/2020	MW-1-021820	< 100	< 1.0	< 1.0	< 1.0	< 2.0	< 210	< 210	< 0.0072	< 25
		12/29/2020	MW-1-20201229	< 100	< 1.0	< 1.0	< 1.0	< 2.0	330	< 220	< 0.0074	---
		4/9/2021	MW-1-040921	< 100	< 1.0	< 1.0	< 1.0	< 2.0	< 200	< 200	< 0.0075	---
		7/6/2021	MW-1-070621	< 100	< 0.20	< 1.0	< 0.20	< 0.60	< 210	270	< 0.0075	---
		10/4/2021	MW-1-100421	< 100	< 0.20	< 1.0	< 0.20	< 0.60	< 200	< 200	< 0.0072	---
MW-2	Farallon	2/18/2020	MW-2-021820	< 100	< 1.0	< 1.0	< 1.0	< 2.0	< 210	< 210	< 0.0076	---
		12/29/2020	MW-2-20201229	< 100	< 1.0	< 1.0	< 1.0	< 2.0	< 210	< 210	< 0.0072	---
		4/9/2021	MW-2-040921	< 100	< 1.0	< 1.0	< 1.0	< 2.0	< 200	< 200	< 0.0076	---
		7/6/2021	MW-2-070621	< 100	< 0.20	< 1.0	< 0.20	< 0.60	< 210	220	< 0.0076	---
		10/4/2021	MW-2-100421	< 100	< 0.20	< 1.0	< 0.20	< 0.60	< 200	< 200	< 0.0072	---
MW-3	Farallon	2/18/2020	MW-3-021820	< 100	< 1.0	< 1.0	< 1.0	< 2.0	< 210	< 210	< 0.0072	---
		12/29/2020	MW-3-20201229	---	---	---	---	---	< 210	< 210	< 0.0072	---
		4/9/2021	MW-3-040921	---	---	---	---	---	< 210	< 210	< 0.0076	---
		7/6/2021	MW-3-070621	---	---	---	---	---	< 210	< 210	< 0.0075	---
		10/4/2021	MW-3-100421	< 100	< 0.20	< 1.0	< 0.20	< 0.60	< 200	< 200	< 0.0072	---
MW-4	Farallon	2/18/2020	MW-4-021820	< 100	< 1.0	< 1.0	< 1.0	< 2.0	< 210	< 210	< 0.0072	---
MTCA Method A Cleanup Level for Groundwater[7]				**800/1,000[8]**	**5**	**1,000**	**700**	**1,000**	**500**	**500**	**0.1**	**4,800[9]**

NOTES:
< denotes analyte not detected at or exceeding the reporting limit listed.
--- denotes sample not analyzed.
[1]Analyzed by Northwest Method NWTPH-Dx.
[2]Analyzed by Northwest Method NWTPH-Gx.
[3]Analyzed by U.S. Environmental Protection Agency (EPA) Method 8021B, 8260B, or 8260D.
[4]Analyzed by EPA Method 8270E/SIM.
[5]Total carcinogenic polycyclic aromatic hydrocarbons derived using the total toxicity equivalency method in Section 708(8) of Chapter 173-340 of the Washington Administrative Code.
[6]Analyzed by EPA Agency Method 200.8.
[7]Washington State Model Toxics Control Act Cleanup Regulation (MTCA) Method A Cleanup Levels for Groundwater, Table 720-1 of Section 900 of Chapter 173-340 of the Washington Administrative Code, as amended 2013, unless otherwise noted.
[8]Cleanup level is 800 micrograms per liter if benzene is detected, and 1,000 micrograms per liter if benzene is not detected.
[9]Washington State Model Toxics Control Act Cleanup Regulation 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

AEI = AEI Consultants
cPAHs = carcinogenic polycyclic aromatic hydrocarbons
DRO = total petroleum hydrocarbons (TPH) as diesel-range organics
Farallon = Farallon Consulting, L.L.C.
GRO = TPH as gasoline-range organics
J = result is an estimate
ORO = TPH as oil-range organics
TEC = toxic equivalent concentration

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Source: *Request for Opinion Letter on Confirmational Groundwater Monitoring*, Farallon Consulting, 2021.