

February 28, 2012

Washington State Department of Ecology
Northwest Regional Office: Toxics Cleanup Division
Attention: Dale Myers
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Delivery Method: USPS & Electronic Copy
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Re: Feasibility Study/Disproportionate Cost Analysis Report & Submittal
Acrowood Corporation
VCP No.: NW2151
4425 S. Third Avenue
Everett, WA 98203

Mr. Myers:

Thom Smith 253-365-7647

EcoCon, Inc. (ECI), on half of The Acrowood Corporation (Acrowood) is pleased to present you with a Draft Feasibility Study (FS), Disproportionate Cost Analysis (DCA) and Terrestrial & Ecological Evaluation. These documents were completed as requested from the Washington State Department of Ecology (Ecology) in the Further Action Letter dated June 22, 2010.

Feasibility Study & Disproportionate Cost Analysis

ECI completed the FS and DCA with the assumption that a minimum of one groundwater monitoring well will be installed in the area of the previously decommissioned monitoring wells MW2 and MW3, located immediately northeast of the impacted area (Area 3) discussed in the FS/DCA. It is not clear why the original monitoring wells MW2 & MW3 were decommissioned, however, a replacement monitoring well in this area, positioned between former MW2 and MW3 will be necessary to adequately monitor groundwater down gradient of Area 3.

The results of the FS/DCA determined that the remedial selection of natural attenuation, institutional controls and compliance groundwater monitoring is compliant with MTCA's DCA process for cost/benefit analysis. As a part of the DCA and on-going FS, ECI recommends capping the general area with asphalt to prevent vertical movement of surface water, along with a compliance groundwater monitoring plan (including a minimum of quarterly monitoring for one year) and deed restriction.

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File: FS-DCA-TEE Submittal Letter - 022812

Terrestrial Ecological Evaluation (TEE)

The TEE was completed as part of a process to evaluate how contaminants of concern may potentially impact surrounding properties' habitat or potential habitat. Following in-depth review of the general area, subject property, proposed remedial efforts (Capping & Natural Attenuation Monitoring), ECI determined the area to the east, Lowell Riverfront was the most susceptible area for "potential" impact. ECI understands through the City of Everett, the current and future development of the Lowell Riverfront area will include increased traffic, municipal infrastructure and private mixed use development to the east of the Site beyond the immediately adjacent BNSF railroad tracks.

This development greatly reduces any potential impact that may have been of concern. The combination of the depth of contamination (beyond 6-feet bgs – conditional point of compliance), asphalt capping, and limited adjacent/contiguous properties containing critical habitat, limits the TEE process Exclusion 2 - Incomplete Pathway. Refer to the attached TEE Process Evaluation Table – Primary Exclusions created by Ecology and completed by ECI. Ecology denotes that "If any of these exclusions apply to your site, you may end your ecological evaluation". Electronic copies of the Final Environmental Impact Statement (FEIS), Addendum No. 1 of the FEIS and Riverfront Development Public Amenities Master Plan are available from the City of Everett Riverfront Redevelopment web page and electronic document library at <http://www.everettwa.org/default.aspx?ID=1614>.

On behalf of Acrowood, ECI requests Ecology perform a review of Site data and information submitted from Acrowood, ECI and previous consultants with specific focus on the FS/DCA and TEE.

On behalf of Acrowood and ECI, we appreciate your time and efforts. Please let me know if you have any questions regarding the enclosed documents or project.

Respectfully,



Matthew P. Loxterman
Sr. Environmental Scientist

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Enc: Terrestrial Ecological Evaluation Process – Primary Exclusions (2 pages)

Terrestrial Ecological Evaluation Process - Primary Exclusions

Documentation Form

Exclusion #	Exclusion Detail	Yes or No?	Are Institutional Controls Required If The Exclusion Applies?
1	Will soil contamination be located at least 6 feet beneath the ground surface and less than 15 feet?	Yes / No	Yes
	Will soil contamination located at least 15 feet beneath the ground surface?	Yes / No	No
	Will soil contamination located below the conditional point of compliance?	Yes / No	Yes
2	Will soil contamination be covered by buildings, paved roads, pavement, or other physical barriers that will prevent plants or wildlife from being exposed?	Yes / No	Yes
3	Is there less than 1.5 acres of <u>contiguous undeveloped land</u> on the site, or within 500 feet of any area of the site affected by hazardous substances other than those listed in the table of <u>Hazardous Substances of Concern</u> ?	Yes / No	Other factors determine
	And Is there less than 0.25 acres of <u>contiguous undeveloped land</u> on or within 500 feet of any area of the site affected by hazardous substances listed in the table of <u>Hazardous Substances of Concern</u> ?	Yes / No	
4	Are concentrations of hazardous substances in the soil less than or equal to natural background concentrations of those substances at the point of compliance	Yes / No	No

[\[Exclusions Main\]](#) [\[TEE Definitions\]](#) [\[Simplified or Site-Specific?\]](#) [\[Simplified Ecological Evaluation\]](#) [\[Site-Specific Ecological Evaluation\]](#) [\[WAC 173-340-7493\]](#)

[\[TEE Home\]](#)

Terrestrial Ecological Evaluation Process - Primary Exclusions

If any of these exclusions apply to your site, you may end your ecological evaluation.

Exclusion #	Exclusion Detail	Yes or No?	Are Institutional Controls Required If The Exclusion Applies?
1	Will soil contamination be located at least 6 feet beneath the ground surface and less than 15 feet?	Yes	Yes
	Will soil contamination located at least 15 feet beneath the ground surface?	No	No
	Will soil contamination located below the conditional point of compliance?	Yes	Yes
2	Will soil contamination be covered by buildings, paved roads, pavement, or other physical barriers that will prevent plants or wildlife from being exposed?	Yes	Yes
3	Is there less than 1.5 acres of <u>contiguous undeveloped land</u> on the site, or within 500 feet of any area of the site affected by hazardous substances other than those listed in the table of <u>Hazardous Substances of Concern</u> ?	No	Other factors determine
	& Is there less than 0.25 acres of <u>contiguous undeveloped land</u> on or within 500 feet of any area of the site affected by hazardous substances listed in the table of <u>Hazardous Substances of Concern</u> ?	No	
4	Are concentrations of hazardous substances in the soil less than or equal to natural background concentrations of those substances at the point of compliance	Yes	No

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DRAFT Feasibility Study / Disproportionate Cost Analysis

4425 South 3rd Street
Everett, Washington
Facility/Site ID#: 22755667
VCP #: NW2151

February 27, 2012

Prepared For:

Acrowood Corporation
4425 South 3rd Street
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1.0 Introduction

The following report provides a site-specific Feasibility Study (FS) / Disproportionate Cost Analysis (DCA) for selection of potential remedial alternatives for addressing petroleum-impacted soil and groundwater at the Acrowood Corporation (Acrowood) Facility located at 4425 South 3rd Street, in Everett, Washington (Site/Facility). The Site is currently enrolled in Washington State Department of Ecology's (Ecology) Voluntary Cleanup Program (VCP) and is moving forward with remedial action planning. This report, attachments and enclosures were prepared per to satisfy Ecology's "Further Action" letter dated June 22, 2010.

This FS/DCA report includes a summary and timeline of previous subsurface investigations completed by ECI and others at the Site and incorporates ECI's investigations detailed below and documented in the *Focused Subsurface Investigation/Remedial Investigation Report* dated September 30, 2011. As a part of this FS, three remedial alternatives were evaluated against Model Toxics Control Act (MTCA) requirements. Each alternative addresses contaminated media with a combination of remedial methodologies and/or controls appropriate for the chemicals of concern (COCs) and Site conditions. The three alternatives represent a reasonable number and range of potentially applicable cleanup components to provide a basis for evaluation as the DCA.

This FS/DCA has been completed with three main assumptions:

1. Additional soil and groundwater investigations will be completed to the east and northeast of the impacted area;
2. Soil and groundwater conditions are similar to previous investigations in this area, i.e., any impacted media is below current or Site specific cleanup levels, and
3. Current and proposed additional groundwater monitoring wells located in the impacted area will provide adequate groundwater monitoring requirements.

1.1 Site Location & Description

1.1.1 Topography

The United States Geological Survey (USGS), Everett, Washington 7.5-Minute Quadrangle topographic map 1991, was reviewed for this ESA. According to the contour lines on the topographic map, the Site is located approximately 45 feet above mean sea level (MSL). The contour lines in the area of the Site indicate the area is generally flat, confirmed by on-site reconnaissance.

1.1.2 Geology and Soils

The subject property and surrounding area are located within the Puget Sound Basin on glaciated outwash (toward the west of the Site), and nearly level alluvial plains closer to the Snohomish River. The

lands in the vicinity of the Site are underlain by inter-bedded gravelly sandy loam (coarse-grained soils) with silty sands.

The USDA Natural Resources Conservation Service, Washington Soil Survey Reports for Snohomish County, indicates the native soil at the Site and surrounding properties is the Everett Gravelly Sandy Loam. This soil is in the Class A Hydrologic Group, indicating high infiltration rates, through both drained sand and gravels. This soil is reported to have high conductivity and low water holding capacity.

1.1.3 Surface Water and Groundwater

No naturally occurring water bodies or wetlands were observed at or within the Site boundary during this investigation. The nearest mapped surface water body is the Snohomish River that lies just to the east of the subject Site. The Snohomish River flows northwesterly through Everett towards the Puget Sound.

The groundwater elevations in monitoring wells in Area 3 of the Site ranged from 85.07 to 87.93 feet on June 14, 2011. The hydraulic gradient was approximately 0.055 feet/foot (i.e., MW-1 to MW-4) and the inferred groundwater flow direction is generally southeast. However, variations in the site-specific geology can influence gradient direction, including perched conditions, confining soil conditions/characteristics, and a retaining wall along the eastern side of Area 3.

2.0 Background & Previous Environmental Investigations

The Site is currently utilized as a metal fabrication facility and is currently occupied by a company named Acrowood. The facility was reportedly constructed in 1913 and occupied by an iron and metal foundry until the early-1970s. Since then, the Site has reportedly been used for metal fabrication since the early-1970s; Acrowood being the owner / operator since 1984.

2.1 Adapt Engineering (1999-2008)

In 1999, Adapt Engineering (Adapt) conducted investigations identifying three areas as containing concentrations of trichloroethene (TCE), oil-range organics (ORO), diesel-range organics (DRO), and polycyclic aromatic hydrocarbons (PAHs) COCs in soil and/or groundwater at concentrations above Model Toxics Control Act (MTCA) Method A or B Cleanup Levels (CULs). Details of these investigations are provided in Adapt's *Supplemental Phase II Site Assessment Report* dated February 6, 2009.

The three areas of concern are as follows:

- 1) Area 1: - Paint and solvent storage shed where TCE was encountered in soil and groundwater at concentrations exceeding applicable Method A Soil & Groundwater CULs. (Refer to Figure 3).
- 2) Area 2: - Former heating oil UST location where ORO were encountered in soil at concentrations below the Method A Soil CUL (Refer to Figure 4).
- 3) Area 3: - Former diesel fuel tank occurred and concentrations of DRO, ORO and PAHs in soil and groundwater exceeded Method A & B Soil & Groundwater CULs (Refer to Figures 5 & 6).

Subsequent investigations by Adapt between 1999 and 2002 involved the installation and monitoring of groundwater monitoring wells MW-1, MW-2 and MW-3 and additional soil and groundwater sampling to further evaluate the extent of impacts in these three areas. The Site was submitted into the VCP by Adapt in January 2007 and Adapt requested a No Further Action (NFA) determination. Ecology responded to this request in a Further Action Opinion Letter dated April 18, 2007 stating that it was necessary to determine the areal extent and depth of TCE groundwater contamination in Area 1 using groundwater monitoring wells. Ecology further indicated that was necessary to determine the areal extent and depth of COCs in Area 2 using existing and additional groundwater monitoring wells.

Based on Ecology's comments, Adapt conducted a Supplemental Phase II Environmental Site Assessment in 2007, which included the installation and quarterly sampling of groundwater monitoring wells MW-4 – MW-7. MW-4 was installed in Area 3, south of the former diesel tank at a lower elevation and MW-5 – MW-7 were installed within Area 1. Refer to attached Figures.

techniques in the locations depicted on Figures 4, 5 and 6. The maximum depth of exploration during the FSI was approximately 14 feet bgs in Area 2 and 20.5 feet bgs in Area 3.

The groundwater table was consistently encountered during soil logging between 8 and 10 feet bgs in Area 2 and between 12 and 14 feet bgs in Area 3. Groundwater samples were collected from all boring locations except ECIMW-5, which required development at a later date prior to sampling. Groundwater samples were collected through a temporary stainless steel well screen using a peristaltic pump and dedicated tubing.

Boring ECIMW-5 was completed as a monitoring well with a 1-inch diameter PVC casing and 0.010-inch factory slotted well screen. The well screen was placed from 5 feet bgs to 20 feet bgs which was sufficient to allow the well screen to intersect the saturated/unsaturated interface throughout normal seasonal changes in water levels. Saturated soil conditions were encountered at approximately 14 feet bgs during drilling. A sand filter-pack surrounds the PVC from 4 feet bgs to 20 feet bgs and a bentonite seal is present above that between 1.5 and 4 feet bgs. The well was completed with a surface seal consisting of a concrete and a flush-mounted well box.

A total of 11 soil samples and five groundwater samples were submitted to ESN Northwest Chemistry Laboratory in Olympia, Washington for analysis of DRO and ORO using Ecology Method NWTPH-Dx. One soil sample and one groundwater sample were selected for follow-up analysis with PAHs using EPA Method 8270 based on initial analytical results.

2.4 Groundwater Sampling

On August 25, 2011 ECI returned to the Site to develop, monitor and sample monitoring well ECIMW-5, monitor and sample MW-1 and MW-4 and sample and take inventory of the 9 unlabeled soil and water drums situated in Area 3 for disposal purposes.

ECI developed well ECIMW-5 by purging approximately 20-gallons of water from the well prior to sampling. Water was observed to be very clear upon completion of well development and no visual or olfactory evidence of impacts were observed. Prior to sampling or development of monitoring wells, the water level in each well was measured relative to the northernmost point on the well casing using an electronic probe. Groundwater samples were transferred directly into laboratory supplied sample containers using standard low-flow groundwater sampling techniques.

Groundwater samples obtained from MW-1, MW-4 and ECIMW-5 were submitted to ALS Environmental Laboratory (ALS) in Everett, WA for analysis of DRO and ORO using Ecology Method NWTHP-Dx and PAHs using EPA Method 8270SIM.

Surface and subsurface conditions at the Site generally consisted of asphalt, gravel or grass at the surface underlain by fill material and intermittent intervals of silt, sand and gravel mixtures that were observed to the maximum depth of exploration of approximately 20.5 feet bgs. Saturated conditions were consistently encountered between 8 and 10 feet bgs in Area 2 and between 12 and 14 feet bgs in Area 3.

2.5 ECI's Analytical Results & cPAH Soil and Groundwater Cleanup Levels

Carcinogenic PAHs (cPAHs) were analyzed in soil and groundwater during the FSI and include benzo(a)anthracene, benzo(b)fluoranthene, benzo(k)fluoranthene, benzo(a)pyrene, chrysene, dibenzo(a,h)anthracene and ideno(1,2,3-cd)pyrene. When establishing compliance with cleanup levels under MTCA, the mixture of these compounds is considered a single hazardous substance. The toxicity equivalency factor (TEF) methodology was developed by the US Environmental Protection Agency (EPA) to evaluate the toxicity and assess the risks of a mixture of structurally related chemicals with a common mechanism of action. A TEF is an estimate of the relative toxicity of a chemical compared to a reference chemical. For mixtures of cPAHs, the reference chemical is benzo(a)pyrene. Therefore, for compliance purposes, the calculated total cPAHs (TEF modified) is compared to the MTCA Method A Soil or Groundwater Cleanup Level for benzo(a)pyrene of 0.1 micrograms/liter (ug/L) for groundwater and 0.1 milligrams/kilogram (mg/kg) for soil.

Soil - Eleven soil samples were collected in Area 3 and submitted to ESN for analysis of DRO and ORO using Ecology Method NWT PH-Dx. Soil sample ECIA3B-2:12 was selected for follow-up analysis with PAHs using EPA Method 8270 based on the results of initial analytical results and field screening. Soil sample analytical results are provided in ECI's FSI Report.

Soil sample location ECIA3B-2:12 was the only location where soil concentrations exceeded MTCA Method A Soil Cleanup Levels. DRO, ORO, total naphthalenes and total cPAHs (TEF modified) were detected in soil at concentrations of 31,000 mg/kg, 2,600 mg/kg, 168 mg/kg and 0.13 mg/kg, respectively. The MTCA Method A Soil Cleanup Level is 2,000 mg/kg for DRO and ORO, 5 mg/kg for total naphthalenes and 0.1 mg/kg for total cPAHs (TEF modified).

Soil samples were collected from below the groundwater table in boring locations ECIA3B-2 and ECIA3B-3 to verify if soil containing concentrations of target analytes exceeding MTCA Method A Soil Cleanup Levels was present below the groundwater table as previously reported. In all of the soil sample locations collected below the observed ground water level, target analytes were either not detected above the laboratory detection limit or detected at a concentration below the applicable MTCA Method A Soil Cleanup Level. No target analytes were detected above laboratory detection limits in any of the remaining soil sample locations.

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Groundwater - As previously mentioned, a total of eight groundwater samples were collected during the FSI (i.e., Two from probe locations in Area 2, three from probe locations in Area 3 and three from groundwater monitoring wells). Groundwater samples collected during the first phase of the FSI were submitted to ESN for analysis of DRO and ORO using Ecology Method NWTPH-Dx. Groundwater sample ECIA3B-2GW was selected for follow-up analysis with PAHs using EPA Method 8270 based on initial analytical results. All groundwater monitoring well samples were submitted to ALS for analysis of DRO and ORO using Ecology Method NWTPH-Dx and PAHs using EPA Method 8270 SIM which has a lower laboratory detection limit of 0.02 ug/L. Groundwater analytical results obtained during the FSI are presented in ECI's FSI Report.

During the first phase of the FSI, DRO was detected in sample location ECIA3B-2GW at a concentration of 920 ug/L, which exceeds the MTCA Method A Groundwater Cleanup Level for DRO of 500 ug/L. Naphthalenes and cPAHs were also detected in this location, but at concentrations below applicable MTCA Method A Groundwater Cleanup Levels. It should be noted that the laboratory detection limit for cPAHs was 0.1 ug/L and it is possible for concentrations of cPAHs below 0.1 ug/L to result in a total cPAH (TEF modified) concentration that exceeds the MTCA Method A Groundwater Cleanup Level of 0.1 ug/L. During the second phase of the FSI, monitoring wells MW-1, MW-4 and ECIMW-5 were sampled and none of the monitoring wells contained dissolved-phase concentrations of target analytes that exceeded MTCA Method A Groundwater Cleanup Levels. Dissolved-phase concentrations of cPAHs were detected in ECIMW-5, but at concentrations below the MTCA Method A Groundwater Cleanup Level. No target analytes were detected above laboratory detection limits in the remaining two groundwater monitoring well sample locations.

2.6 Chemicals of Concern (COCs) & Media of Concern

Cleanup Level (CUL)	Remedial Action Objective
GROUNDWATER 500 µg/L – Diesel Range Organics 500 µg/L – Oil Range Organics	Reduce concentrations of COCs in groundwater to achieve the respective MTCA Method A cleanup levels.
SOIL 2,000 mg/kg - Diesel Range Organics 2,000 mg/kg - Oil Range Organics	Reduce concentrations of COCs in soil to achieve the respective MTCA Method A cleanup levels.

2.7 Extent of Impacts

2.7.1 Soil

Soil analytical data obtained from previous investigation activities combined with FSI data demonstrate that soil impacts are no longer a concern in Areas 1 and 2 and these areas require no further action.

The estimated lateral extent of soil impacts in Area 3 is depicted on Figure 5. Soil data obtained during the FSI indicates that all soil containing concentrations of target analytes exceeding MTCA Method A Soil Cleanup Levels is situated above the ground water table. Therefore, the estimated vertical extent of the area where soil exceeds MTCA Cleanup Levels is between 9 and 13 feet bgs. This is a conservative estimate based on the fact that current FSI data was incorporated with previous investigation data, some of which is over 10 years old, to generate the estimated area of impacts. It is possible that soil concentrations in the previous sample locations have decreased due natural attenuation and this was not taken into consideration when estimating the area of soil impacts.

There is an estimated 60 cubic-yards of impacted soil present in this area and soil impacts do not appear to extend off-Site. However, soil impacts likely extend beneath the eastern portion of the shop structure. This would appear to make it cost prohibitive to excavate these soils due to the fact that extensive costs would be associated with supporting the building and retaining wall during excavation. When compared to the benefit of removing such a small volume of soil, the costs are disproportionate.

2.7.2 Groundwater

Groundwater analytical data obtained from previous investigation activities demonstrate that groundwater impacts are no longer a concern in Area 1. Therefore, no further action is necessary in Area 1.

During the FSI, ECI complied with Ecology's request to sample groundwater in the area of the former heating oil tank (Area 2) by collecting groundwater sample ECIA2B-1 in the location where a previous soil sample (i.e., P-8) contained an ORO soil concentration of 1,920 mg/kg. In addition, ground water was collected at ECIA2B-2 situated west of ECIA2B-1, also in the location of the former heating oil tank. Neither of the groundwater samples contained concentrations of target analytes above the laboratory detection limits. Therefore, no further action is necessary in Area 2.

The estimated extent of groundwater impacts in Area 3 is depicted on Figure 6. FSI data combined with previous groundwater data indicate that an approximate 500 square-foot area is impacted with concentrations of one or more target analytes exceeding MTCA Method A Groundwater Cleanup Levels. It does not appear that impacted ground water extends off-site and the estimated area of groundwater impacts is a conservative estimate based on the fact that current FSI data was incorporated with

previous investigation data, some of which is over 10 years old, to generate the estimated area of impacts and potential natural attenuation of impacts was not taken into consideration.

During ECI's FSI, sample ECIA3B-2 was collected approximately 2 feet southwest of boring P-26, which was sampled in July of 2007. The dissolved-phase concentration of DRO detected at that time was 7,800 ug/L and the detected DRO concentration in ECIA3B-2 during the FSI in July of 2011 was 920 ug/L. This decrease in concentration over a 4 year period appears to indicate that natural attenuation may be effective at remediating groundwater impacts at the Site and the estimated area of groundwater impacts depicted on Figure 6 of ECI's FSI Report.

2.8 Exposure Pathways

This section presents the evaluation, findings and conclusions pertaining to the exposure pathways at the Site. The goal of this subsection is to identify potential exposure scenarios that will assist in the evaluation of potential feasible cleanup alternatives that are protective of human health.

2.8.1 Direct-Contact Pathway

Direct contact with soil and groundwater exhibiting concentrations of petroleum hydrocarbons in excess of the cleanup levels is limited to human receptors that come into close contact with the media via direct exposure, including dermal contact or ingestion of excavated soil or groundwater. The standard point of compliance for soil contamination beneath a site is approximately 15 feet bgs, which represents a reasonable estimate of the depth that could be accessed during normal site redevelopment activities (WAC 173-340-740[6][d]). Although PCS is present within 15 feet of the ground surface, due to the existing pavement, contaminated soil beneath the Site is not easily accessible, thereby minimizing the direct-contact pathway. However, until such point as the contaminated soil and groundwater are removed from the Site or an institutional control limiting direct contact is implemented, the direct-contact pathway is complete.

2.8.2 Soil to Groundwater Pathway

Results from the FSI and previous investigations conducted by others suggest that soil contamination exists locally in the subsurface at depths greater than the seasonally high groundwater level (FSI – ECI 2012). The petroleum contaminated soil can therefore potentially act as an ongoing source to groundwater contamination as the hydrocarbons desorb from the soil particles into water.

Under MTCA, monitored natural attenuation can be considered an active remedial measure if site conditions conform to the expectations listed in WAC 173-340-370(7), as follows:

- Source control (including removal and/or treatment of hazardous substances) has been conducted to the maximum extent practicable.
- Leaving contaminants on-site during the restoration time frame does not pose an unacceptable threat to human health or the environment.

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- There is evidence that natural biodegradation or chemical degradation is occurring and will continue to occur at a reasonable rate at the site.
- Appropriate monitoring requirements are conducted to ensure that the monitored natural attenuation process

2.8.3 Vapor Intrusion Pathway

Using the guidance provided in Ecology 2009 draft guidance document *Guidance for Evaluating Soil Vapor Intrusion in Washington State: Investigation and Remedial Action* (Ecology 2009), the potential risks to human health and the environmental from the vapor intrusion pathway at the Site are not significant and do not warrant additional investigation. The observations that form the basis for this conclusion are the following:

- The risk of vapor intrusion into overlying building is mitigated by the absence of volatile organic compounds in soil and groundwater, as stated in Section 1.4.1 of the Ecology draft guidance document.

2.8.4 Surface Water

Migration of contaminants via surface water infiltration and leaching to the subsurface is partially mitigated by the asphalt and concrete covering certain areas of the Site. Additional institutional controls may be necessary to manage future surface water infiltration.

3.0 Remedial Alternatives Review

The purpose of this feasibility study (FS) is to develop and evaluate cleanup action alternatives to facilitate selection of a final cleanup action at the Site in accordance with WAC 173-340-350(8). An FS typically includes an extensive development, screening, and evaluation process for numerous remedial alternatives. However, because property-specific conditions preclude many remedial components from application at the Site, the evaluation focused on a limited number of likely feasible components and alternatives that are both implementable and capable of achieving the remediation objectives.

In addition, the FS process screens cleanup alternatives to eliminate those that are not technically possible, those with costs that are disproportionate under WAC 173-340-360(3)(e), or those that will substantially affect the future planned business operations at the Site. Based on the screening, the FS presented below evaluates the most advantageous remedial components to recommend a final cleanup action for the Site in conformance with WAC 173-340-360 through WAC 173-340-390. Selection of the final cleanup action and details of its implementation will be documented in the Cleanup Action Plan (CAP), which will be prepared by Ecology in accordance with WAC 173-340-380.

3.1 Cleanup Standards

The selected cleanup alternative must comply with MTCA cleanup regulations specified in WAC 173-340 and with applicable state and federal laws. The cleanup standards selected for the Site are discussed in detail below.

3.1.1 Applicable or Relevant and Appropriate Requirements

Under WAC 173-340-350 and 173-340-710, applicable requirements include regulatory cleanup standards, standards of control, and other environmental requirements, criteria, or limitations established under state or federal law that specifically address a contaminant, remedial action, location, or other circumstances at a site.

MTCA (WAC 173-340-710[3]) defines relevant and appropriate requirements as:

Those cleanup action standards, standards of control, and other environmental requirements, criteria or limitations established under state and federal law that, while not legally applicable to the hazardous substance, cleanup action, location, or other circumstances at a site, address problems or situations sufficiently similar to those encountered at the site that their use is well suited to the particular site.

The criteria used to make this determination are presented in WAC 173-340-710(4)(a)-(i).

Remedial actions conducted under MTCA must comply with the substantive requirements of the applicable or relevant and appropriate requirements (ARARs) but are exempt from their procedural

requirements (WAC 173-340-710[9]). Specifically, this exemption applies to state and local permitting requirements under the Washington State Water Pollution Control Act, Solid Waste Management Act, Hazardous Waste Management Act, Clean Air Act, State Fisheries Code, and Shoreline Management Act.

3.1.2 Development of Cleanup Standards

MTCA Method A cleanup levels for soil and groundwater have been established as the cleanup level for groundwater at the Site. The table below provides the MTCA Method A cleanup level for soil and groundwater for each COC that has historically been detected at a concentration exceeding its respective cleanup level, as well as the Site-specific benzene concentration in soil that would be protective of occupational vapor intrusion scenarios.

3.1.3 Remedial Action Objectives

RAOs are general administrative goals for a cleanup action that address the overall MTCA cleanup process. The purpose of establishing RAOs for a site is to provide remedial alternatives that protect human health and the environment (WAC 173-340-350). In addition, RAOs are designated in order to:

- Implement administrative principles for cleanup (WAC 173-340-130).
- Meet the requirements, procedures, and expectations for conducting an FS and developing cleanup action alternatives as discussed in WAC 173-340-350 through 173-340-370.
- Develop cleanup levels (WAC 173-340-700 through 173-340-760) and remedial alternatives that are protective of human health and the environment.

In particular, RAOs must include the following threshold requirements from WAC 173-340:

- Protect human health and the environment.
- Comply with cleanup levels.
- Comply with applicable state and federal laws.
- Provide for compliance monitoring.

The remedial action objectives for the Site are to mitigate risks to human health and the environment and to obtain regulatory closure from Ecology.

3.2 Evaluation of Alternatives

The evaluation of remedial alternatives was based on Model Toxics Control Act's (MTCA) disproportionate cost analysis (DCA) that identifies which of the alternatives met MTCA threshold requirements and Remedial Action Objectives. This analysis compares the relative benefits and costs of cleanup alternatives in selecting the alternative whose incremental cost is not disproportionate to the incremental benefits. The seven criteria used in the DCA, as specified in WAC 173-340-360(2) and (3), are:

Table 1: Remediation Alternative Comparison

MTCA threshold requirements and Remedial Action Objectives	Remedial Alternatives			
	Alternative 1	Alternative 2	Alternative 3	Alternative 4
Protectiveness	1	2	2	3
Permanence	1	2	2	3
Long-term Effectiveness	1	2	2	3
Management of Short-term Risks	1	3	3	3
Technical & Administrative Implementability	3	3	3	1
Consideration of Public Concerns	1	2	3	3
Totals:	8	14	15	16

4.2 Base Alternative

Alternative 2, Capping and Institutional Controls, is considered to be the *base alternative* because it represents a viable remedy with the lowest cost disregarding Alternative 1: No Action. The benefits and costs of all other alternatives are compared to the base alternative to determine if their higher costs are in proportion to their expected increased benefit. This procedure is termed the “disproportionate cost analysis” and is one of the evaluation steps referenced under MTCA.

For the DCA, *benefit* is defined in terms of the evaluation criteria and each of the seven criteria is on an equal scale. Each alternative receives a score from 1 to 3 under each criterion. A score of 1 indicates the alternative satisfies the MTCA criterion the least, while a score of 3 indicates the best performance. A minimum score of 7 and a total maximum score of 21 is possible. The basis for scoring under each criterion is described below. Alternatives are evaluated and scored in Table 2: Evaluation and Scoring of Remedial Action Alternatives, attached.

4.2.1 Base Alternative Detail

The Base Alternative includes the preparation of a Cleanup Action Plan (CAP), implementation / installation of a containment cap (asphalt and / or concrete) over the affected exterior areas of the Site and implementation of an institutional control such as a management plan or contaminant contingency plan to limit access and/or administer proper protocol for dealing with soil beneath portions of the property. This cleanup alternative would also include monitoring of groundwater to demonstrate that the natural attenuation process is taking place at a reasonable rate.

DRO and ORO (COCs) concentrations in soil beneath the Site are expected to attenuate slowly by virtue of their physical and chemical properties that preclude volatilization as a significant removal mechanism for these compounds. To account for the slower attenuation rate of the COC compounds, the expected duration to achieve soil cleanup levels for all COCs ranges from 7 to 13 years with an average of 10 years.

Quarterly groundwater monitoring would be conducted until a minimum of four consecutive quarters of groundwater samples indicate concentrations of COCs that are compliant with their respective MTCA Method A cleanup levels.

4.3 Basis for *Benefit* Scoring

This section indicates the specific factors for each of the MTCA criteria used to assign a score between 1 and 3 to for the remedial alternatives.

4.3.1 Overall Protection of Human Health and the Environment

1. Protection of human health and the environment is uncertain.
2. Achieves remedial objectives for preventing exposure to indicator hazardous substances. Provides limited control of future releases to groundwater and surface water. Cleanup standards achieved over a long period of time.
3. Prevents exposure to indicator hazardous substances. Eliminates future releases to groundwater and surface water. Cleanup standards are achieved relatively quickly.

4.3.2 MTCA Compliance – Point of Compliance

1. Attaining the Point of Compliance is uncertain. Approvals may be difficult to obtain or require a lengthy process.
2. Meets Point of Compliance. Approvals from agencies and affected parties are likely to be obtainable.
3. Meets Point of Compliance. Cleanup standards are readily achievable. Approvals from agencies and affected parties are likely to be readily obtainable.

4.3.3 Short-term Effectiveness

1. Protection of human health and the environment is uncertain. May not reduce risks prior to attainment of cleanup standards.
2. Protects human health and the environment. Moderately reduces risks prior to attainment of cleanup standards.
3. Protects human health and the environment. Greatly reduces risks prior to attainment of cleanup standards.

Feasibility Study / Disproportionate Cost Analysis

4425 South 3rd Street

Everett, Washington

Facility/Site ID#: 22755667 | VCP #: NW2151

4.3.4 Long-term Effectiveness

1. Cleanup success and long-term reliability are uncertain. Management of treatment wastes and untreated indicator hazardous substances is uncertain.
2. Moderate probability of cleanup success and long-term reliability. Management approaches for indicator hazardous substances are moderately certain to succeed.
3. High probability of cleanup success and long-term reliability. Management approaches for indicator hazardous substances are highly likely to succeed.

4.3.5 Reduction of Toxicity/Mobility/Volume through Treatment

1. Other than existing source controls indicator hazardous substances are not permanently reduced in toxicity, mobility, or volume, nor are they irreversibly immobilized or destroyed.
2. Some indicator hazardous substances would likely be permanently reduced in toxicity, mobility, or volume.
3. Most indicator hazardous substances would be permanently reduced in toxicity.

4.3.6 Implementability

1. Technology has technical or administrative constraints.
2. Technology that may have some technical or administrative constraints.
3. Conventional and readily available technology with no expected technical or administrative constraints.

4.3.7 Degree to which Community Concerns Are Addressed

Community concerns are not known at this time. However, the remedial efforts are within the confines of a large industrial facility, which is less than 5% of the area of the Property and facility.

1. Does not address community concerns.
2. Partially addresses community concerns, such as reducing long-term releases to groundwater and surface water.
3. Addresses community.

4.4 Cost Basis

Proposed costs for each alternative are presented below:

Alternative 1: NA

Alternative 2: \$100,000 to \$125,000

Alternative 3: \$200,000 to \$250,000

Alternative 4: \$275,000 to \$350,000

5.0 Summary

As an aid to selecting a preferred remedial alternative, costs versus benefits were assessed for each alternative, as shown in Table 2. The key result of the cost versus benefit evaluation is the cost/benefit ratio, shown in the far right column. This ratio indicates how the cost and benefit of each alternative varies relative to the base alternatives.

Alternative 2 (Capping and Institutional Controls) was used as the base cost alternative because it is a viable alternative and predicted to have the lowest cost, other than No Action. Benefit ratios were determined relative to the base case of Alternative 4 because it has the highest benefit score.

A cost-benefit ratio of 1 indicates that an alternative's benefits are in proportion to its cost. If the ratio is greater than 1, it indicates that the cost is disproportionate to the benefit. As shown in Table 4 Remedial Action Cost Comparison, Alternative 4 were judged to have costs that are disproportionate to benefits.

Alternative 3 has a cost-benefit ratio of 1.1, indicating that its cost only slightly exceeds its benefit. All of the other alternatives (other than No Action) have much higher cost-benefit ratios than Alternative 2, indicating their costs exceed their benefits to a much greater degree than for Alternative 2.

Attachment A

Project Figures

Figure 1 - General Vicinity map

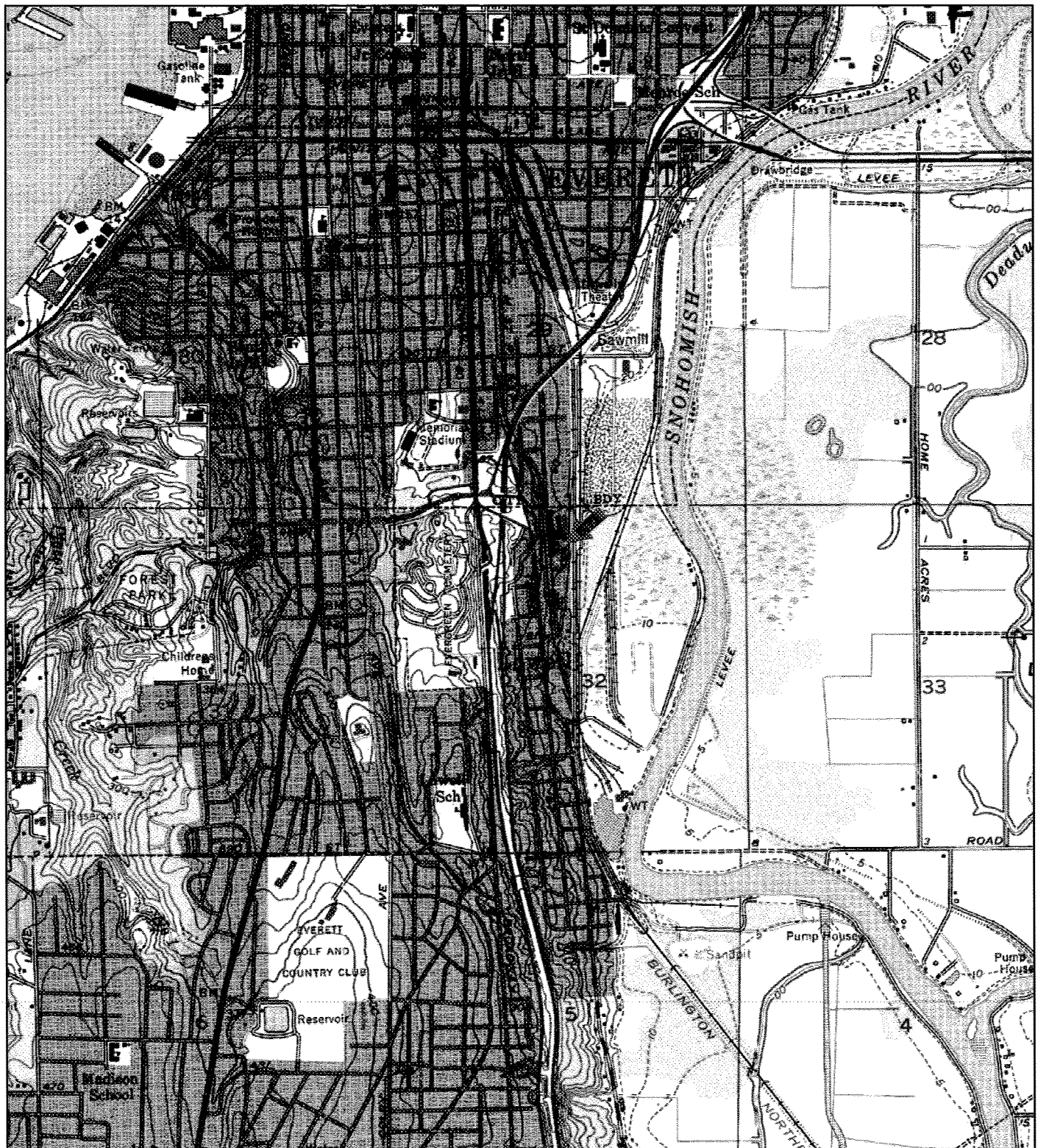
Figure 2 - Site Representation Map

Figure 3 - Area 1 Paint/Solvent Storage Area

Figure 4 - Area 2 Former Heating Oil
UST & ECI Investigation Area

Figure 5 - Area 3 Former Location of Fuel
Tank & Estimated Extent of Soil Impacts

Figure 6 - Area 3 Former Location of Fuel Tank
& Estimated Extent of Groundwater Impacts



KEY:

SOURCE: USGS 7.5 MINUTE QUADRANGLES
(TOPOGRAPHIC)



EVERETT, WASHINGTON
NW 1/4 OF EVERETT 15' QUADRANGLE
1953 (PHOTOREVISED 1968 & 1973)

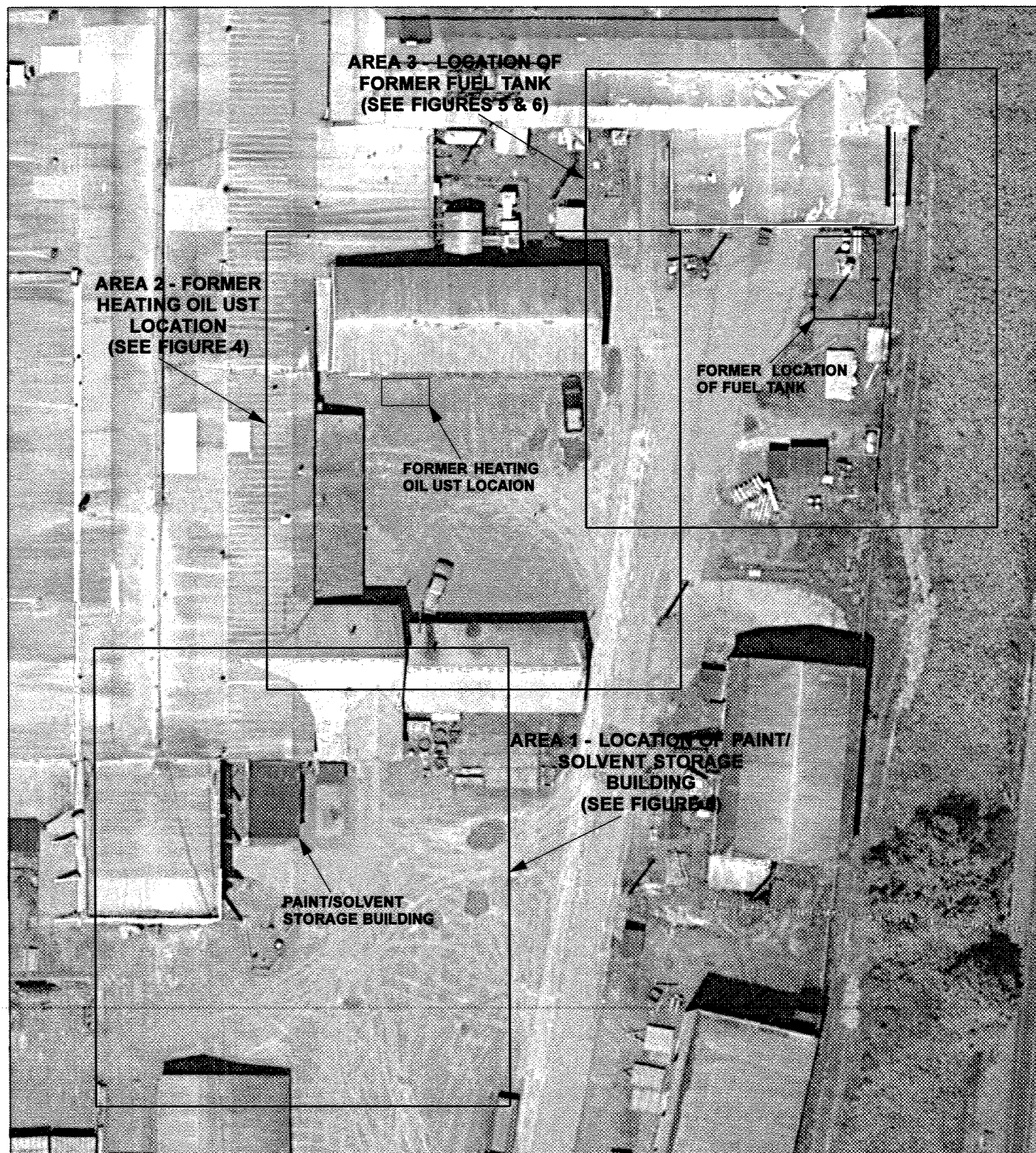
SCALE = 1:24,000

ECI environmental services
www.eciconline.com

FIGURE 1

GENERAL VICINITY MAP

PROJECT	ACROWOOD CORP		
PREPARED FOR	ACROWOOD CORPORATION		
LOCATION	4425 SOUTH THIRD AVENUE EVERETT, WASHINGTON		
SHEET 1 of 1	DRAWN BY JS	REVIEWED BY SS	DATE 9/30/11



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FIGURE 2

SITE REPRESENTATION

PROJECT ACROWOOD CORP

PREPARED FOR ACROWOOD CORPORATION

LOCATION 4425 SOUTH THIRD AVENUE
EVERETT, WASHINGTON

SHEET
1 of 1

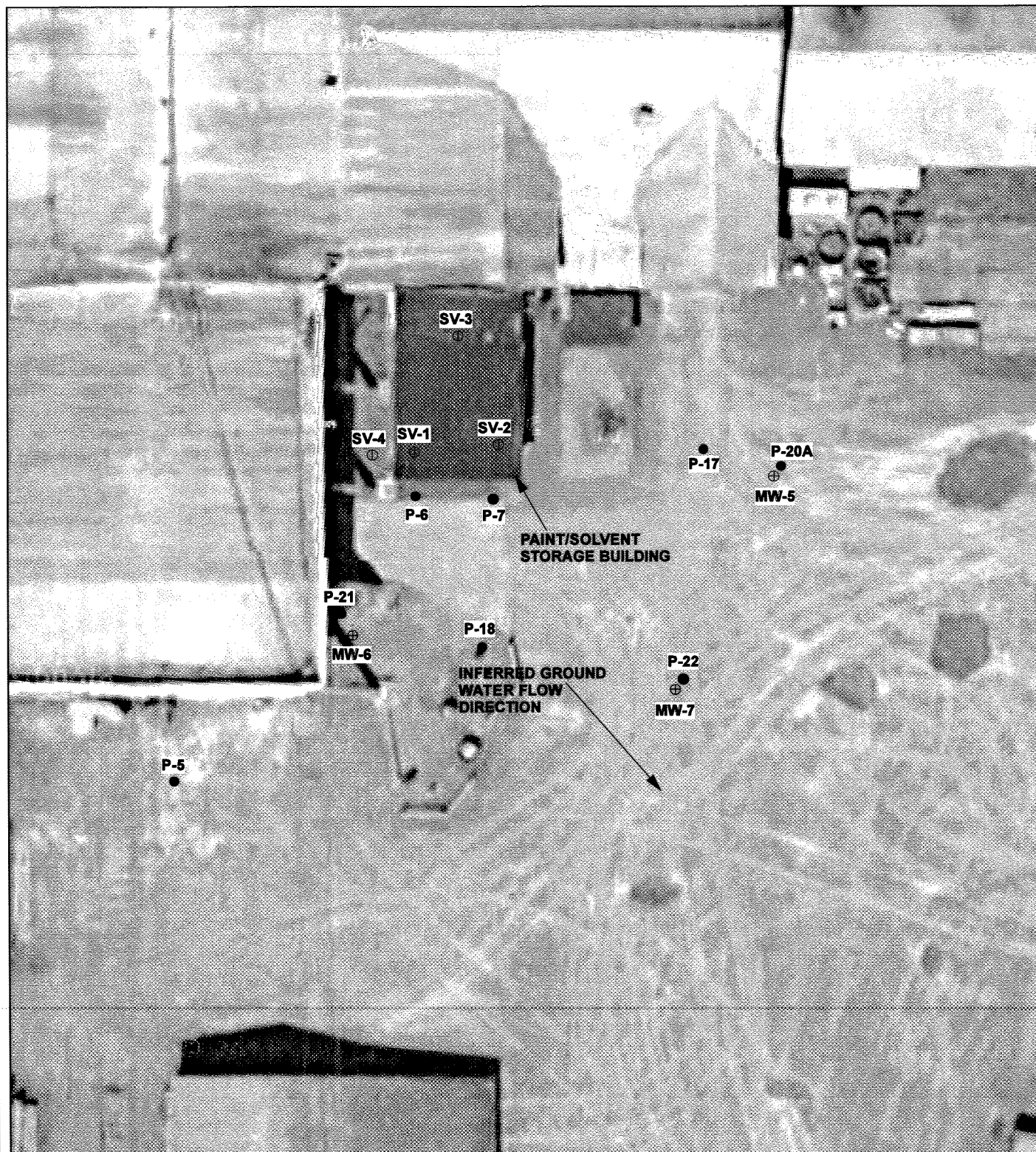
DRAWN BY
JS

REVIEWED BY
SS

DATE
9/30/11

0 25 50
APPROXIMATE SCALE: 1" = 50'





- ⊕ ADAPT ENGINEERING GROUND WATER MONITORING WELL LOCATION
 - Ⓢ ADAPT ENGINEERING SOIL VAPOR HOLE LOCATION
 - ADAPT ENGINEERING GEOPROBE LOCATION
- INFERRED GROUND WATER FLOW DIRECTION BASED ON GROUND WATER ELEVATION DATA OBTAINED FROM PREVIOUS INVESTIGATIONS

0 10 20
 APPROXIMATE SCALE: 1" = 20'

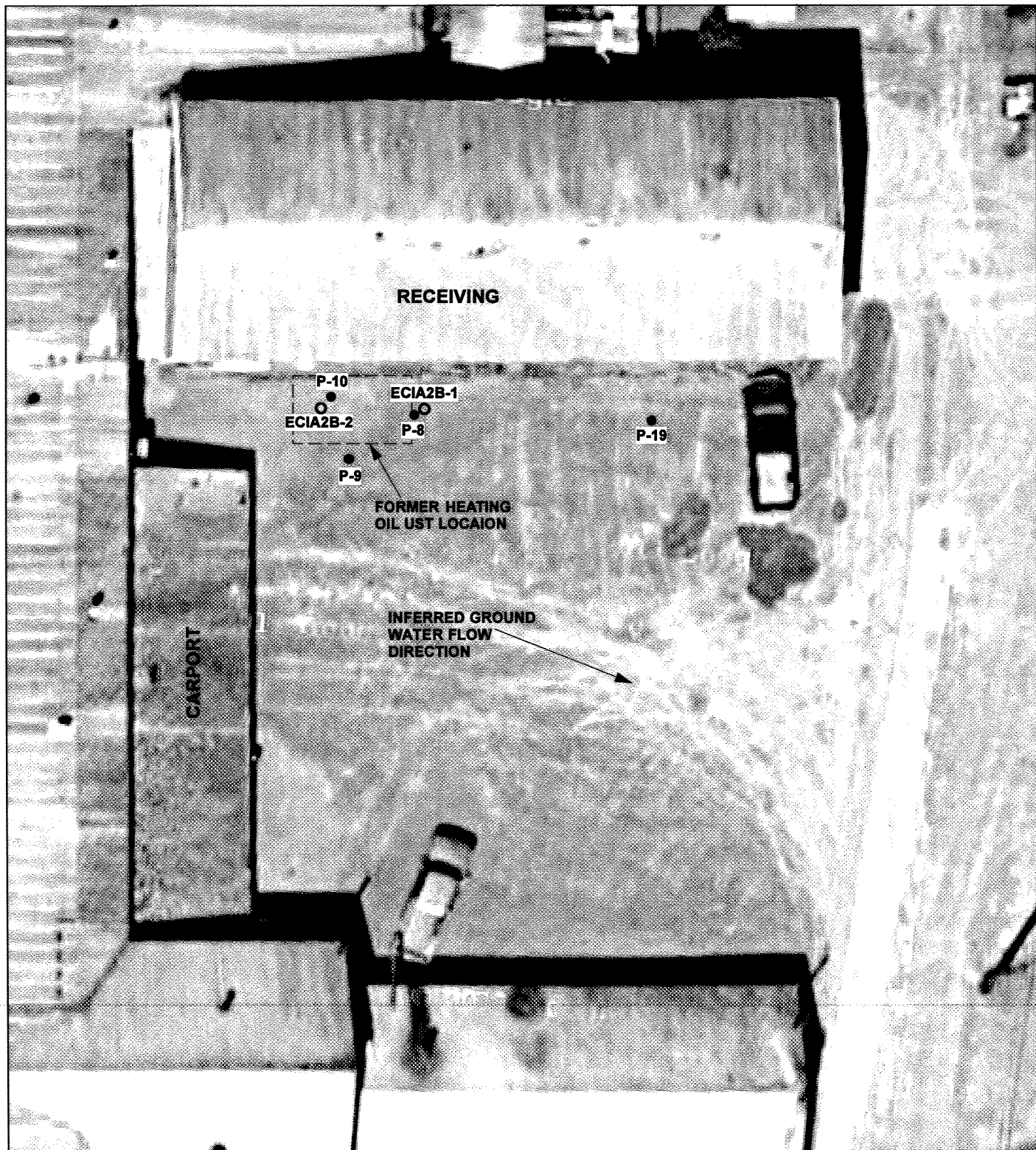


ECI environmental services
www.ecocononline.com

FIGURE 3

AREA 1
 PAINT/SOLVENT STORAGE AREA

PROJECT	ACROWOOD CORP			
PREPARED FOR	ACROWOOD CORPORATION			
LOCATION	4425 SOUTH THIRD STREET EVERETT, WASHINGTON			
SHEET 1 of 1	DRAWN BY JS	REVIEWED BY SS	DATE 9/30/11	



- ECI GROUNDWATER SAMPLE LOCATION
- ADAPT ENGINEERING GEOPROBE LOCATION
- INFERRED GROUND WATER FLOW DIRECTION BASED ON GROUND WATER ELEVATION DATA OBTAINED FROM PREVIOUS INVESTIGATIONS

HEATING OIL UST LOCATION BASED ON ADAPT ENGINEERING SITE PLAN WHICH WAS NOT TO SCALE

0 10 20
 APPROXIMATE SCALE: 1" = 20'



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FIGURE 4

AREA 2
 FORMER HEATING OIL UST LOCATION &
 ECI INVESTIGATION AREA

PROJECT	ACROWOOD CORP			
PREPARED FOR	ACROWOOD CORPORATION			
LOCATION	4425 SOUTH THIRD AVENUE EVERETT, WASHINGTON			
SHEET 1 of 1	DRAWN BY JS	REVIEWED BY SS	DATE 9/30/11	



- ⊕ ECI GROUNDWATER MONITORING WELL LOCATION
- ECI SOIL AND/OR GROUNDWATER SAMPLE LOCATION
- ⊕ ADAPT ENGINEERING GROUND WATER MONITORING WELL LOCATION
- ADAPT ENGINEERING GEOPROBE LOCATION
- ⊕ ADAPT ENGINEERING HAND AUGER LOCATION
- INFERRED GROUND WATER FLOW DIRECTION BASED ON GROUND WATER ELEVATION DATA OBTAINED FROM PREVIOUS INVESTIGATIONS

0 10 20
 APPROXIMATE SCALE: 1" = 20'

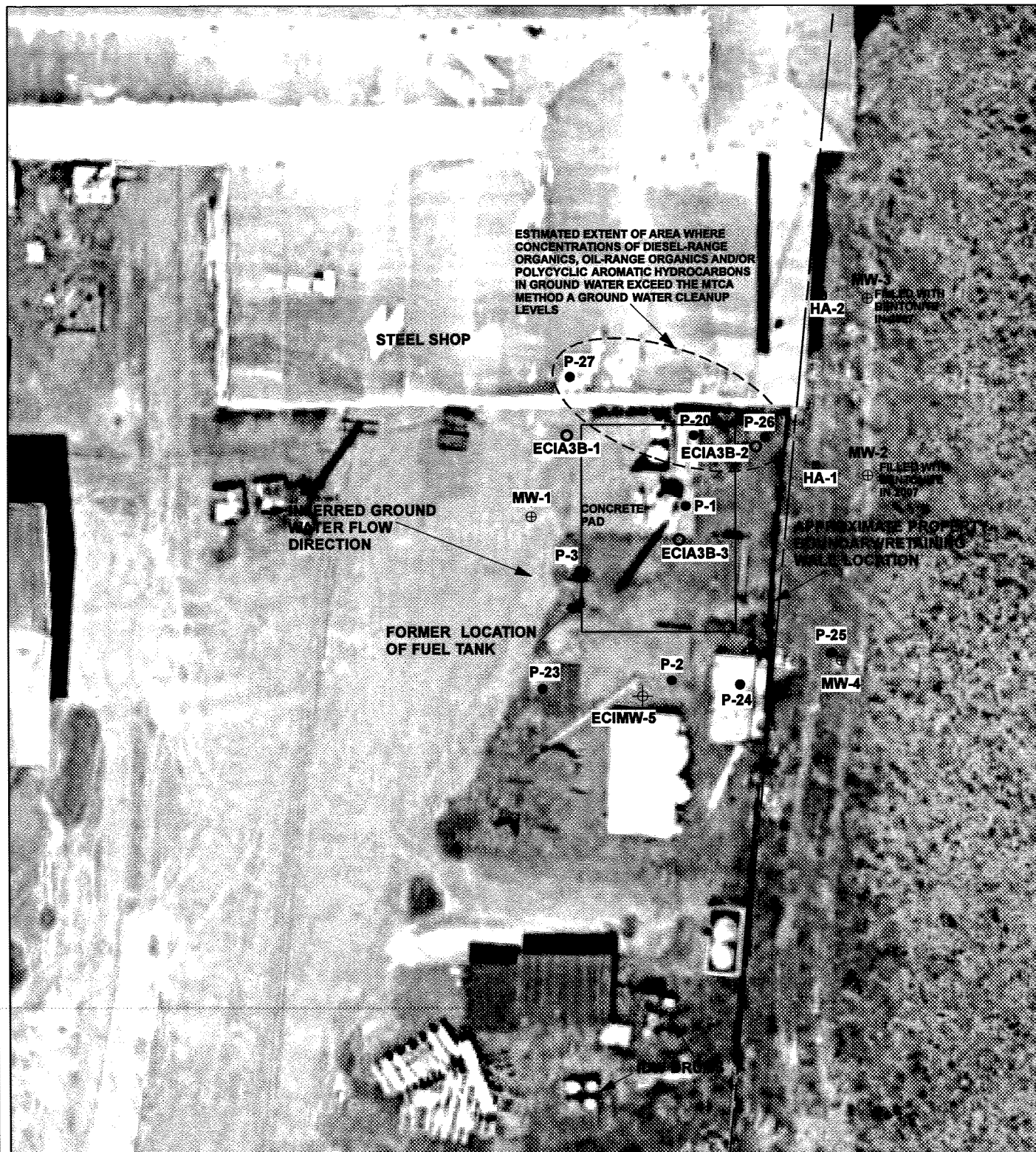


ECI environmental services
 www.eciconline.com

FIGURE 5

AREA 3
 FORMER LOCATION OF FUEL TANK &
 ESTIMATED EXTENT OF SOIL IMPACTS

PROJECT	ACROWOOD CORP		
PREPARED FOR	ACROWOOD CORPORATION		
LOCATION	4425 SOUTH THIRD AVENUE EVERETT, WASHINGTON		
SHEET 1 of 1	DRAWN BY JS	REVIEWED BY SS	DATE 9/30/11



- ⊕ ECI GROUNDWATER MONITORING WELL LOCATION
- ECI SOIL AND/OR GROUNDWATER SAMPLE LOCATION
- ⊕ ADAPT ENGINEERING GROUND WATER MONITORING WELL LOCATION
- ADAPT ENGINEERING GEOPROBE LOCATION
- ⊕ ADAPT ENGINEERING HAND AUGER LOCATION
- INFERRED GROUND WATER FLOW DIRECTION BASED ON GROUND WATER ELEVATION DATA OBTAINED FROM PREVIOUS INVESTIGATIONS

0 10 20
 APPROXIMATE SCALE: 1" = 20'



ECI environmental services
 www.eciconline.com

FIGURE 6

AREA 3
 FORMER LOCATION OF FUEL TANK &
 ESTIMATED EXTENT OF GROUND WATER IMPACTS

PROJECT	ACROWOOD CORP			
PREPARED FOR	ACROWOOD CORPORATION			
LOCATION	4425 SOUTH THIRD AVENUE EVERETT, WASHINGTON			
SHEET 1 of 1	DRAWN BY JS	REVIEWED BY SS	DATE 9/30/11	

Attachment B

Feasibility Level Cost Estimate Tables

Alternative 1 - Monitored Natural Attenuation with Institutional Controls

Alternative 2 - Partial Removal & Off Site Disposal & Institutional Controls

Alternative 3 - Complete Removal & Offsite Disposal

Attachment B
Feasibility Level Cost Estimate Tables

Cost Description	Qty	Unit	Unit Cost	Total Cost
Institutional Controls				
Negotiate with Ecology and implement institutional control	1	\$	15,000.00	\$ 15,000.00
Site Work				
Installation of an asphalt/concrete cap	1	\$	15,000.00	\$ 15,000.00
Contingency				
Percentage of total scope of work	1		\$ 6,000.00	
Professional Services				
Project management & administration (15% of total)			\$ 5,400.00	
Total Project Costs:				\$ 41,400.00
Operations & Maintenance Items				
		Annual Cost		Extended Costs
Quarterly Groundwater Monitoring and Reporting (1 year)	\$	15,000.00	\$	15,000.00
Annual Maintenance and Monitoring (10 years)	\$	500.00	\$	5,000.00
Annual MNA Sampling (10 years)	\$	5,000.00	\$	50,000.00
Confirmation Sampling, Analysis, Well Closure and Reporting (Year 10)			\$	15,000.00
Total O&M Project Costs:				\$ 85,000.00
Total Project Estimated Cost:				\$ 126,400.00

Cost Description	Qty	Unit	Unit Cost	Total Cost
Permitting				
Grading Permit Fees	1	ls	\$ 3,500.00	\$ 3,500.00
Shoring Permit Fees	1	ls	\$ 3,500.00	\$ 3,500.00
Geotechnical Engineering Support Services				
Preliminary geotechnical engineering report	1		\$ 7,500.00	\$ 7,500.00
Structural Engineering Support Services				
Shoring Design	1		\$ 3,000.00	\$ 3,000.00
Geotechnical Engineering Services				
Field oversight - shoring installation	3	day	\$ 1,200.00	\$ 3,600.00
Field oversight - excavation and backfill	10	day	\$ 1,200.00	\$ 12,000.00
Shoring Contractor				
Install H-pile & lagging shoring	250	face foot	\$ 55.00	\$ 13,750.00
Install pin pile shoring around building perimeter	20	ea	\$ 750.00	\$ 15,000.00
Well abandonment within proposed excavation				
Survey - baseline, weekly, conclusion of field work	1	ls	\$ 10,000.00	\$ 10,000.00
Excavation Contractor				
Mob/demob, erosion control, temporary site controls	1		\$ 7,500.00	\$ 7,500.00
Asphalt demolition and removal	1	ls	\$ 2,000.00	\$ 2,000.00
Asphalt and concrete disposal	1	ls	\$ 1,000.00	\$ 1,000.00
Excavate and stockpile overburden	250	tn	\$ 5.00	\$ 1,250.00
Excavate, haul and dispose PCS at Subtitle D landfill	250	tn	\$ 55.00	\$ 13,750.00
Place and compact overburden	250	tn	\$ 20.00	\$ 5,000.00
Import, place and compact structural backfill	250	tn	\$ 25.00	\$ 6,250.00
Confirmation analytical - Mobile Laboratory	3	ea	\$ 1,750.00	\$ 5,250.00
Well replacement	2	ea	\$ 2,000.00	\$ 4,000.00
Site restoration (gravel only)	1	ls	\$ 3,000.00	\$ 3,000.00
Institutional Controls				
Negotiate with Ecology and implement institutional control				\$ 15,000.00
Contingency: Percentage of total scope of work	20	%		\$ 27,170.00
			Construction Subtotal:	\$ 163,020.00
Mobilization, Contingencies & Demobilization				
Mobilization (0.5% of construction subtotal)				\$ 815.10
Bid (1.5% of construction subtotal)				\$ 2,445.30
Scope (10% of construction subtotal)				\$ 16,302.00
Engineering / Environmental Consulting Services (15% of construction total)				\$ 24,453.00
			Construction Total:	\$ 207,035.40
Operations & Maintenance Items		Annual Cost		Extended Costs
Quarterly Groundwater Monitoring and Reporting (1 year)	\$	15,000.00	\$	15,000.00
Annual Maintenance and Monitoring (10 years)	\$	500.00	\$	5,000.00
Annual MNA Sampling (10 years)	\$	5,000.00	\$	50,000.00
Confirmation Sampling, Analysis, Well Closure and Reporting (Year 10)			\$	15,000.00
Total O&M Project Costs:				\$ 85,000.00
			Total Project Estimated Cost:	\$ 292,035.40

Cost Description	Qty	Unit	Unit Cost	Total Cost
Permitting				
Grading Permit Fees	1	ls	\$ 3,500.00	\$ 3,500.00
Shoring Permit Fees	1	ls	\$ 3,500.00	\$ 3,500.00
Geotechnical Engineering Support Services				
Preliminary geotechnical engineering report	1	ls	\$ 7,500.00	\$ 7,500.00
Structural Engineering Support Services				
Shoring Design (Building & Retaining Wall)	1	ls	\$ 7,500.00	\$ 7,500.00
Geotechnical Engineering Services				
Field oversight - shoring installation	5	day	\$ 1,200.00	\$ 6,000.00
Field oversight - excavation and backfill	15	day	\$ 1,200.00	\$ 18,000.00
Shoring Contractor				
Install H-pile & lagging shoring	500	face foot	\$ 55.00	\$ 27,500.00
Install pin pile shoring	40	ea	\$ 750.00	\$ 30,000.00
Well abandonment within proposed excavation				
Survey - baseline, weekly, conclusion of field work	1	ls	\$ 15,000.00	\$ 15,000.00
Excavation Contractor				
Mob/demob, erosion control, temporary site controls	1		\$ 7,500.00	\$ 7,500.00
Asphalt demolition and removal	1	ls	\$ 2,000.00	\$ 2,000.00
Asphalt and concrete disposal	1	ls	\$ 1,000.00	\$ 1,000.00
Excavate and stockpile overburden	250	tn	\$ 5.00	\$ 1,250.00
Excavate, haul and dispose PCS at Subtitle D landfill (exterior)	250	tn	\$ 55.00	\$ 13,750.00
Excavate, haul and dispose PCS at Subtitle D landfill (exterior)	400	tn	\$ 75.00	\$ 30,000.00
Place and compact overburden (exterior)	250	tn	\$ 20.00	\$ 5,000.00
Import, place and compact structural backfill	250	tn	\$ 25.00	\$ 6,250.00
Import, place and compact structural backfill	400	tn	\$ 25.00	\$ 10,000.00
Confirmation analytical - Mobile Laboratory	3	ea	\$ 1,750.00	\$ 5,250.00
Well replacement	2	ea	\$ 2,000.00	\$ 4,000.00
Site restoration (exterior gravel only)	1	ls	\$ 3,000.00	\$ 3,000.00
Site restoration (Interior Floor)	1	ls	\$ 16,000.00	\$ 16,000.00
Institutional Controls				
Negotiate with Ecology and implement institutional control	1	ls		\$ 15,000.00
Contingency: Percentage of total scope of work	20	%		\$ 47,700.00
Construction Subtotal:				\$ 286,200.00
Mobilization, Contingencies & Demobilization				
Mobilization (0.5% of construction subtotal)				\$ 1,431.00
Bid (1.5% of construction subtotal)				\$ 4,293.00
Scope (10% of construction subtotal)				\$ 28,620.00
Engineering / Environmental Consulting Services (15% of construction total)				\$ 42,930.00
Construction Total:				\$ 363,474.00
Operations & Maintenance Items	Annual Cost	Extended Costs		
Quarterly Groundwater Monitoring and Reporting (1 year)	\$ 15,000.00	\$	15,000.00	
Well Decommissioning		\$	5,000.00	
Total O&M Project Costs:			\$ 20,000.00	
Total Project Estimated Cost:				\$ 383,474.00

Attachment C

Project Analytical Tables

Table 1- Summary of Area 1 Soil Analytical Results

Table 2 - Summary of Area 2 Soil Analytical Results

Table 3 - Summary of Area 3 Soil Analytical Results

Table 4 - Summary of Area 1 Groundwater Analytical Results

Table 5 - Summary of Areas 2 & 3 Groundwater Analytical Results

Sample ID	Date Collected	Sample depth (bg)	Benzene	Toluene	Ethylbenzene	Total Xylenes	cis-1,2-Dichloroethylene	Trichloroethylene	Tetrachloroethylene	Acetone	1,1-Dichloroethylene
P5S2	11/3/1999	8	ND	ND	ND	ND	ND	ND	ND	ND	ND
P6S2	11/3/1999	8	ND	ND	ND	ND	ND	ND	ND	ND	ND
P7S2	11/3/1999	8	ND	ND	ND	ND	ND	0.055	ND	ND	ND
SV-1-4	3/27/2000	2.5-4	ND	ND	ND	ND	ND	ND	ND	ND	ND
SV-2-3.5	3/27/2000	2.5-3.5	ND	ND	ND	ND	ND	ND	ND	ND	ND
SV-3-3.5	3/27/2000	2.5-3.5	ND	ND	ND	ND	ND	ND	ND	ND	ND
SV-4-3.5	3/27/2000	2.5-3.5	ND	ND	ND	ND	ND	ND	ND	ND	ND
P20A	7/24/2007	10-12	<0.03	<0.05	<0.06	<0.1	<0.05	<0.03	<0.026	<0.5	<0.05
P-21	7/24/2007	8-10	<0.03	<0.05	<0.06	<0.1	<0.05	<0.03	<0.026	<0.5	<0.05
P-22	7/24/2007	8-10	<0.03	<0.05	<0.06	<0.1	<0.05	<0.03	<0.026	<0.5	<0.05
MTCA Method A Soil Cleanup Level For Unrestricted Land Uses			0.03	7	6	9	NA	0.03	0.05	NA	NA

Bolded and shaded concentration - indicates that the concentration exceeded the MTCA Method A Soil Cleanup Level

Volatile organic compounds analyzed using EPA Method 8260

All data obtained from previous consultants

ND - indicates analyte was not detected at a concentration above the laboratory detection limit

NA - indicates that data was not available

Table 2
Summary of Area 2 Analytical Results
DRO & ORO in Soil (milligrams/kilogram)
Acrowood Corporation
4425 South Third Avenue, Everett, WA

September 9, 2011

Sample ID	Date Collected	Sample depth (bg)	HCID-Gasoline Range Organics	HCID-Diesel Range Organics	HCID-Oil Range Organics	Diesel Range Organics	Oil Range Organics
P8S3	11/3/1999	8.5	<20	>50	>100	983	1,920
P9S3	11/3/1999	12	<20	<50	<100	-	-
P10S3	11/3/1999	12	<20	<50	<100	-	-
P19-9	4/17/2000	6-9	-	-	-	<30	<60
MTCA Method A Soil Cleanup Level For Unrestricted Land Uses			NA	NA	NA	2,000	2,000

Bolded concentration - Indicates that the detected concentration was above the compound-specific laboratory detection limit

HCID - Hydrocarbon Identification analyzed using Ecology Method NWTPH-HCID

Diesel and oil range organics analyzed using Ecology Method NWTPH-Dx

All data obtained from previous consultants

NA - indicates that data was not available

"-" Indicates sample was not analyzed for the indicated analysis

September 9, 2011

Sample ID	Date Collected	Sample depth (bg)	Diesel-Range Organics(a)	Oil-Range Organics(a)	1-Methylnaphthalene(b)	2-Methylnaphthalene(b)	Naphthalene(b)	Total Naphthalenes(b,c)	Acenaphthene(b)	Acenaphthylene(b)	Anthracene(b)	Benzo(g,h,i)perylene(b)	Fluorene(b)	Fluoranthene(b)	Phenanthrene(b)	Pyrene(b)	Benzo(e)anthracene(d)	Benzo(a)pyrene(d)	Benzo(b)fluoranthene(d)	Benzo(k)fluoranthene(d)	Chrysene(d)	Dibenzo(a,h)anthracene(d)	Ideno(1,2,3-cd)pyrene(d)	Total cPAHs
Adapt Engineering Investigation Data																								
P1S4	11/3/1999	16	10,000	4,010	-	-	-	11.3	6.27	1.21	6.94	0.745	7.86	2.86	28.2	11.3	4.62	1.53	0.705	ND	7.01	ND	ND	2.133
P1S6	11/3/1999	22	ND	ND	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	NA
P2S3	11/3/1999	12	ND	ND	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	NA
P3S3	11/3/1999	12	134	210	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	NA
P20-12	4/17/2000	9-12	-	-	-	-	-	16	7.9	ND	7.1	<2	12	2.1	33	11	5.1	1.4	<2	<2	8	ND	ND	1.99
P20-16	4/17/2000	12-16	ND	ND	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	NA
HA1-4	4/17/2000	3-4	75	500	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	NA
HA2-5	4/17/2000	4-5	ND	ND	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	NA
P-23	7/23/2007	12-14	<50	<100	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	NA
P-24	7/23/2007	12-14	<50	<100	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	NA
P-25	7/24/2007	4-6	<50	<100	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	NA
P-26	7/24/2007	12-14	440	580	-	-	-	1.9	1.9	<0.5	1.6	6.2	2	1.7	5.8	4.3	3.1	6.1	7	2.9	5	1.9	5.2	8.16
P-27	7/24/2007	12-14	<50	<250	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	NA
EcoCon, Inc Investigation Data																								
ECIA3B-1:4	7/21/2011	4	<50	<100	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	NA
ECIA3B-1:12	7/21/2011	12	<50	<100	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	NA
ECIA3B-2:8	7/21/2011	8	<50	<100	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	NA
ECIA3B-2:12	7/21/2011	12	31,000	2,600	58	96	14	168	11	1.5	7.3	0.61	2.4	ND	29	ND	0.3	ND	ND	0.91	0.61	ND	ND	0.13
ECIA3B-2:16	7/21/2011	16	<50	<100	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	NA
ECIA3B-2:17	7/21/2011	17	250	<100	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	NA

September 9, 2011

Sample ID	Date Collected	Sample depth (bg)	Diesel-Range Organics(a)	Oil-Range Organics(a)	1-Methylnaphthalene(b)	2-Methylnaphthalene(b)	Naphthalene(b)	Total Naphthalenes(b,c)	Acenaphthene(b)	Acenaphthylene(b)	Anthracene(b)	Benzo(g,h,i)perylene(b)	Fluorene(b)	Fluoranthene(b)	Phenanthrene(b)	Pyrene(b)	Benzo(a)anthracene(d)	Benzo(a)pyrene(d)	Benzo(b)fluoranthene(d)	Benzo(k)fluoranthene(d)	Chrysene(d)	Dibenzo(a,h)anthracene(d)	Ideno(1,2,3-cd)pyrene(d)	Total cPAHs
ECIA3B-2:20	7/21/2011	20	<50	<100	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	NA
ECIA3B-3:12	7/21/2011	12	<50	200	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	NA
ECIA3B-3:16	7/21/2011	16	<50	<100	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	NA
Toxicity Equivalency Factors (TEF)			NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.1	1	0.1	0.1	0.01	0.1	0.1	NA
MTCA Method A Soil Cleanup Level For Unrestricted Land Uses			2,000	2,000	NA	NA	5	5	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.1	NA	NA	NA	NA	NA	0.1

Bolded and shaded concentration - indicates that the concentration exceeded the MTCA Method A Soil Cleanup Level

Bolded concentration - Indicates that the detected concentration was above the compound-specific laboratory detection limit, but did not exceed a cleanup level

(a) Diesel and oil-range organics analyzed using Ecology Method NWTPH-Dx with silica gel cleanup

(b) Polycyclic aromatic hydrocarbons (PAHs) analyzed using EPA Method 8270

(c) Total naphthalenes is the sum of the naphthalene, 1-Methylnaphthalene and 2-Methylnaphthalene concentrations

(d) Carcinogenic PAHs analyzed using EPA Method 8270

(e) Total carcinogenic polycyclic aromatic hydrocarbons is the sum of each individual cPAH concentration multiplied by the corresponding toxicity equivalency factors. The total represents the total toxicity equivalent concentration for the mixture and is compared to the MTCA Method A Cleanup Level for benzo(a)pyrene for compliance purposes

EcoCon, Inc. investigation soil sample analysis performed by Environmental Services Network

"-" Indicates sample was not analyzed for the indicated compound

NA - indicates that data was not available or applicable

Table 4
Summary of Area 1 Analytical Results
VOCs in Groundwater (micrograms/liter)
Acrowood Corporation
4425 South Third Avenue, Everett, WA

September 9, 2011

Sample ID	Date Collected	Benzene	Toluene	Ethylbenzene	Total Xylenes	cis-1,2-Dichloroethylene	Trichloroethylene	Tetrachloroethylene	Acetone	1,1-Dichloroethylene
P6W1	11/3/1999	ND	ND	ND	ND	ND	8.38	ND	ND	ND
P-17W	11/3/1999	ND	ND	ND	ND	ND	4.9	ND	ND	ND
P-18W	11/3/1999	ND	ND	ND	ND	ND	0.27	ND	ND	ND
MW-5	8/20/2007	<1	<1	<1	<2	<1	1.6	<1	<10	<1
	1/17/2008	<1	<1	<1	<2	<1	<1	<1	<10	<1
	3/21/2008	<1	<1	<1	<2	<1	<1	<1	<10	<1
	8/7/2008	<1	<1	<1	<2	<1	<1	<1	<10	<1
MW-6	8/20/2007	<1	<1	<1	<2	<1	<1	<1	<10	<1
	1/17/2008	<1	<1	<1	<2	<1	<1	<1	<10	<1
	3/21/2008	<1	<1	<1	<2	<1	<1	<1	<10	<1
	8/7/2008	<1	<1	<1	<2	<1	<1	<1	<10	<1
MW-7	8/20/2007	<1	<1	<1	<2	<1	<1	<1	<10	<1
	1/17/2008	<1	<1	<1	<2	<1	<1	<1	<10	<1
	3/21/2008	<1	<1	<1	<2	<1	<1	<1	<10	<1
	8/7/2008	<1	<1	<1	<2	<1	<1	<1	<10	<1
P20A	7/24/2007	<1	<1	<1	<2	<1	<1	<1	<10	<1
P-21	7/24/2007	<1	<1	<1	<2	<1	<1	<1	<10	<1
P-22	7/24/2007	<1	<1	<1	<2	<1	<1	<1	<10	<1
MTCA Method A Groundwater Cleanup Level For Unrestricted Land Uses		5	1,000	700	1,000	NA	5	5	NA	NA

ates that the concentration exceeded the MTCA Method A Ground Water Cleanup Level
ted concentration was above the laboratory detection limit, but did not exceed a cleanup level
organic compounds analyzed using EPA Method 826

All data obtained from previous consultants
as not detected at a concentration above the laboratory detection limit
NA - indicates that data was not available

September 09, 2011

Sample ID	Date Collected	Diesel-Range Organics(a)	Oil-Range Organics(a)	1-Methylnaphthalene(b)	2-Methylnaphthalene(b)	Naphthalene(b)	Total Naphthalenes(b,c)	Acenaphthene(b)	Acenaphthylene(b)	Anthracene(b)	Benzo(g,h,i)perylene(b)	Fluorene(b)	Fluoranthene(b)	Phenanthrene(b)	Pyrene(b)	Benzo(a)anthracene(d)	Benzo(a)pyrene(d)	Benzo(b)fluoranthene(d)	Benzo(k)fluoranthene(d)	Chrysene(d)	Dibenz(a,h)anthracene(d)	Ideno(1,2,3-cd)pyrene(d)	Total cPAHs(e)
Adapt Engineering Area 3 Investigation Data																							
P-20	4/17/2000	-	-	-	-	-	60	16	2.1	8.7	0.94	17	2.7	36	12	5.6	1.6	0.77	<0.5	8.8	<0.5	<0.5	2.33
HA1-W	4/17/2000	ND	ND	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	NA
HA2-W	4/17/2000	ND	ND	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	NA
P23-GW	7/23/2007	52	<250	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	NA
P26-GW	7/24/2007	7,800	3,100	-	-	-	58	17	<1	11	4.4	16	4.9	43	18	7.4	6.2	5.4	2.3	13	1.1	3.4	8.29
P27-GW	7/24/2007	160	510	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	NA
MW-1	8/10/2000	<250	<500	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA
	11/15/2000	<250	<500	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA
	2/23/2001	<250	<500	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA
	6/5/2001	<250	<500	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA
	6/20/2007	<50	<250	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	NA
	1/17/2008	<50	<250	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	NA
	3/21/2008	<50	<250	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	NA
	8/7/2008	<50	<250	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	NA
MW-2	8/10/2000	<250	<500	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA
	11/15/2000	<250	<500	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA
	2/23/2001	<250	<500	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA
	6/5/2001	<250	<500	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA
MW-3	8/10/2000	<250	<500	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA
	11/15/2000	<250	<500	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA
	2/23/2001	<250	<500	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA
	6/5/2001	<250	<500	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA

CHAIN-OF-CUSTODY RECORD

CLIENT: Ecocon, Inc.

ADDRESS: 1912 64th Ave Tacoma WA

PHONE: 253-238-9270 FAX: 253-369-6228

CLIENT PROJECT #: _____ PROJECT MANAGER: Jerry Sawetz

DATE: 7/21/11 PAGE 1 OF 2

PROJECT NAME: Acro wood

LOCATION: Everett, WA

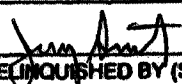

COLLECTOR: Jerry Sawetz DATE OF COLLECTION 7/2/11

[illegible]

CHAIN-OF-CUSTODY RECORD

CLIENT: <u>Ecocon, Inc.</u> ADDRESS: _____ PHONE: <u>SAME AS PAGE 1</u> FAX: _____ CLIENT PROJECT #: _____ PROJECT MANAGER: _____	DATE: _____ PAGE <u>2</u> OF <u>2</u> PROJECT NAME: _____ LOCATION: _____ COLLECTOR: _____ DATE OF COLLECTION: _____
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Sample Number	Depth	Time	Sample Type	Container Type	ANALYSES																NOTES	Total Number of Containers	Laboratory	Notes Number																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																					
					TPH/HCD	TPH - DIESEL & OL	TPH - GASOLINE	BTX	VOC 220CL	VOC 220B	Semivol 2270	PAHs 2270	PCBs 2022	CL Pesticides 2021	PCBs 8 Metals	MTCA 8 Metals	Pb	Asbestos-PLM	DRO Suite	DRO Suite					WHO Suite																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																				
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RELINQUISHED BY (Signature) 	DATE/TIME <u>7/27/11</u>	RECEIVED BY (Signature) 	DATE/TIME <u>7/27/11 1630</u>	SAMPLE RECEIPT TOTAL NUMBER OF CONTAINERS _____ CHAIN OF CUSTODY SEALS Y/N/NA _____ SEALS INTACT? Y/N/NA _____ RECEIVED GOOD COND./COLD _____ NOTES: _____	LABORATORY NOTES: Turn Around Time: 24 HR 48 HR 5 DAY
SAMPLE DISPOSAL INSTRUCTIONS <input type="checkbox"/> ESN DISPOSAL @ \$2.00 each <input type="checkbox"/> Return <input type="checkbox"/> Pickup					

Lab

From: Jerry Sawetz [jerrys@ecocononline.com]
Sent: Monday, August 01, 2011 12:30 PM
To: Lab
Subject: Re: Acrowood Project Analysis
Attachments: image003.jpg; ATT00024.txt; image003.jpg; ATT00027.txt

Hi Sara,

Please provide the PAH and naphthalene data for the ECIA3-B2GW ground water sample and run soil sample ECIA3-B2:12 for PAHs and naphthalenes using 8270. Please feel free to contact me at 425-301-1227 or via email with any questions.

Thanks

Jerry Sawetz
Environmental Scientist | EcoCon, Inc.

ESN NORTHWEST CHEMISTRY LABORATORY

EcoCon
ACROWOOD PROJECT
Everett, Washington

ESN Northwest
1210 Eastside Street SE Suite 200
Olympia, WA 98501
(360) 459-4670 (360) 459-3432 Fax
lab@esnnw.com

Analysis of Polynuclear Aromatic Hydrocarbons in Water by Method 8270

Analytical Results

	Reporting	MTH BLK	LCS	ECIA3B-2GW
Date extracted	Limits	07/27/11	07/27/11	07/27/11
Date analyzed	(ug/L)	07/28/11	07/28/11	07/28/11
Acenaphthene	0.1	nd	134%	0.30
Acenaphthylene	0.1	nd	109%	0.10
Anthracene	0.1	nd	137%	nd
Benzo(a)anthracene*	0.1	nd	139%	0.10
Benzo(a)pyrene*	0.1	nd	143%	nd
Benzo(b)fluoranthene*	0.1	nd	137%	nd
Benzo(ghi)perylene	0.1	nd	126%	nd
Benzo(k)fluoranthene*	0.1	nd	130%	nd
Chrysene*	0.1	nd	129%	nd
Dibenzo(a,h)anthracene*	0.1	nd	132%	nd
Fluorene	0.1	nd	125%	0.20
Fluoranthene	0.1	nd	146%	nd
Indeno(1,2,3-cd)pyrene*	0.1	nd	128%	nd
Naphthalene	0.1	nd	116%	6.0
1-Methylnaphthalene	0.1	nd	ns	12
2-Methylnaphthalene	0.1	nd	ns	15
Phenanthrene	0.1	nd	137%	1.1
Pyrene	0.1	nd	142%	nd

Surrogate recoveries:

2-Fluorobiphenyl	100%	87%	103%
p-Terphenyl-d14	106%	108%	105%

Data Qualifiers and Analytical Comments

* - Carcinogenic Analyte

nd - not detected at listed reporting limits

na - not analyzed

C - coelution with sample peaks

M - matrix interference

J - estimated value

Results reported on dry-weight basis

Acceptable Recovery limits: 50% TO 150%

Acceptable RPD limit: 35%

ESN NORTHWEST CHEMISTRY LABORATORY

EcoCon
ACROWOOD PROJECT
Everett, Washington

ESN Northwest
1210 Eastside Street SE Suite 200
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(360) 459-4670 (360) 459-3432 Fax
lab@esnnw.com

Analysis of Polynuclear Aromatic Hydrocarbons in Soil by Method 8270**Analytical Results**

		MTH BLK	LCS	ECIA3-B2:12
Date extracted	Reporting	08/02/11	08/02/11	08/02/11
Date analyzed	Limits	08/02/11	08/02/11	08/02/11
Moisture, %	(mg/kg)			25%
Acenaphthene	0.02	nd	136%	11
Acenaphthylene	0.02	nd	111%	1.5
Anthracene	0.02	nd	134%	7.3
Benzo(a)anthracene*	0.02	nd	123%	0.30
Benzo(a)pyrene*	0.02	nd	149%	nd
Benzo(b)fluoranthene*	0.02	nd	145%	nd
Benzo(ghi)perylene	0.02	nd	133%	0.61
Benzo(k)fluoranthene*	0.02	nd	136%	0.91
Chrysene*	0.02	nd	124%	0.61
Dibenzo(a,h)anthracene*	0.02	nd	138%	nd
Fluorene	0.02	nd	128%	2.4
Fluoranthene	0.02	nd	144%	nd
Indeno(1,2,3-cd)pyrene*	0.02	nd	132%	nd
Naphthalene	0.02	nd	115%	14
1-Methylnaphthalene	0.02	nd	ns	58
2-Methylnaphthalene	0.02	nd	ns	96
Phenanthrene	0.02	nd	138%	29
Pyrene	0.02	nd	142%	nd

Surrogate recoveries:

2-Fluorobiphenyl	98%	90%	101%
p-Terphenyl-d14	105%	111%	106%

Data Qualifiers and Analytical Comments

* - Carcinogenic Analyte

nd - not detected at listed reporting limits

na - not analyzed

C - coelution with sample peaks

M - matrix interference

J - estimated value

Results reported on dry-weight basis

Acceptable Recovery limits: 50% TO 150%

Acceptable RPD limit: 35%

CHAIN-OF-CUSTODY RECORD

CLIENT: Eco con, Inc.

ADDRESS: 1912 64th Ave Tacoma WA

PHONE: 253-238-9270 FAX: 253-369-6228

CLIENT PROJECT #: _____ PROJECT MANAGER: Jerry Sawet

DATE: 7/21/11 PAGE 1 OF 2

PROJECT NAME: Acro wood

LOCATION: Everett, WA



COLLECTOR: Jerry Sawetz DATE OF COLLECTION 7/2/11

[illegible]

CHAIN-OF-CUSTODY RECORD

CLIENT: <u>Eco-con, Inc.</u> ADDRESS: _____ PHONE: <u>SAME AS PAGE 1</u> FAX: _____ CLIENT PROJECT #: _____ PROJECT MANAGER: _____	DATE: _____ PAGE <u>2</u> OF <u>2</u> PROJECT NAME: _____ LOCATION: _____ COLLECTOR: _____ DATE OF COLLECTION: _____
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Sample Number	Depth	Time	Sample Type	Container Type	ANALYSES																NOTES	Total Number of Containers	Laboratory																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																														
					TPH/HCB	TPH - DIESEL & OIL	TPH - GASOLINE	BTEX	VOC 8260CL	VOC 8260	Semivol 8270	PAHs 8270	PCBs 8062	CL Pesticides 8061	ROPA 8 Metals	MTCA 8 Metals	Pb	Asbestos-PLM	GRO Suite	DRO Suite				WFO Suite																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																													
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RELINQUISHED BY (Signature)	DATE/TIME	RECEIVED BY (Signature)	DATE/TIME	SAMPLE RECEIPT	LABORATORY NOTES:
	7/27/11		7/27/11 1630	TOTAL NUMBER OF CONTAINERS	
RELINQUISHED BY (Signature)	DATE/TIME	RECEIVED BY (Signature)	DATE/TIME	CHAIN OF CUSTODY SEALS Y/N/A	
				SEALS INTACT? Y/N/A	
				RECEIVED GOOD COND./COLD	
SAMPLE DISPOSAL INSTRUCTIONS				NOTES:	Turn Around Time: 24 HR 48 HR 5 DAY
<input type="checkbox"/> ESN DISPOSAL @ \$2.00 each <input type="checkbox"/> Return <input type="checkbox"/> Pickup					

ESN NORTHWEST CHEMISTRY LABORATORY

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ACROWOOD PROJECT
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(360) 459-4670 (360) 459-3432 Fax
lab@esnnw.com

Analysis of Polynuclear Aromatic Hydrocarbons in Water by Method 8270

Analytical Results

	Reporting	MTH BLK	LCS	ECIA3B-2GW
Date extracted	Limits	07/27/11	07/27/11	07/27/11
Date analyzed	(ug/L)	07/28/11	07/28/11	07/28/11
Acenaphthene	0.1	nd	134%	0.30
Acenaphthylene	0.1	nd	109%	0.10
Anthracene	0.1	nd	137%	nd
Benzo(a)anthracene*	0.1	nd	139%	0.10
Benzo(a)pyrene*	0.1	nd	143%	nd
Benzo(b)fluoranthene*	0.1	nd	137%	nd
Benzo(ghi)perylene	0.1	nd	126%	nd
Benzo(k)fluoranthene*	0.1	nd	130%	nd
Chrysene*	0.1	nd	129%	nd
Dibenzo(a,h)anthracene*	0.1	nd	132%	nd
Fluorene	0.1	nd	125%	0.20
Fluoranthene	0.1	nd	146%	nd
Indeno(1,2,3-cd)pyrene*	0.1	nd	128%	nd
Naphthalene	0.1	nd	116%	6.0
1-Methylnaphthalene	0.1	nd	ns	12
2-Methylnaphthalene	0.1	nd	ns	15
Phenanthrene	0.1	nd	137%	1.1
Pyrene	0.1	nd	142%	nd

Surrogate recoveries:

2-Fluorobiphenyl	100%	87%	103%
p-Terphenyl-d14	106%	108%	105%

Data Qualifiers and Analytical Comments

* - Carcinogenic Analyte

nd - not detected at listed reporting limits

na - not analyzed

C - coelution with sample peaks

M - matrix interference

J - estimated value

Results reported on dry-weight basis

Acceptable Recovery limits: 50% TO 150%

Acceptable RPD limit: 35%

ESN NORTHWEST CHEMISTRY LABORATORY

EcoCon
ACROWOOD PROJECT
Everett, Washington

ESN Northwest
1210 Eastside Street SE Suite 200
Olympia, WA 98501
(360) 459-4670 (360) 459-3432 Fax
lab@esnnw.com

Analysis of Polynuclear Aromatic Hydrocarbons in Soil by Method 8270

Analytical Results

		MTH BLK	LCS	ECIA3-B2:12
Date extracted	Reporting	08/02/11	08/02/11	08/02/11
Date analyzed	Limits	08/02/11	08/02/11	08/02/11
Moisture, %	(mg/kg)			25%
Acenaphthene	0.02	nd	136%	11
Acenaphthylene	0.02	nd	111%	1.5
Anthracene	0.02	nd	134%	7.3
Benzo(a)anthracene*	0.02	nd	123%	0.30
Benzo(a)pyrene*	0.02	nd	149%	nd
Benzo(b)fluoranthene*	0.02	nd	145%	nd
Benzo(ghi)perylene	0.02	nd	133%	0.61
Benzo(k)fluoranthene*	0.02	nd	136%	0.91
Chrysene*	0.02	nd	124%	0.61
Dibenzo(a,h)anthracene*	0.02	nd	138%	nd
Fluorene	0.02	nd	128%	2.4
Fluoranthene	0.02	nd	144%	nd
Indeno(1,2,3-cd)pyrene*	0.02	nd	132%	nd
Naphthalene	0.02	nd	115%	14
1-Methylnaphthalene	0.02	nd	ns	58
2-Methylnaphthalene	0.02	nd	ns	96
Phenanthrene	0.02	nd	138%	29
Pyrene	0.02	nd	142%	nd

Surrogate recoveries:

2-Fluorobiphenyl	98%	90%	101%
p-Terphenyl-d14	105%	111%	106%

Data Qualifiers and Analytical Comments

* - Carcinogenic Analyte

nd - not detected at listed reporting limits

na - not analyzed

C - coelution with sample peaks

M - matrix interference

J - estimated value

Results reported on dry-weight basis

Acceptable Recovery limits: 50% TO 150%

Acceptable RPD limit: 35%

CHAIN-OF-CUSTODY RECORD

CLIENT: <u>Ecocon, Inc.</u> ADDRESS: <u>1912 64th Ave Tacoma WA</u> PHONE: <u>253-238-9270</u> FAX: <u>253-369-6228</u> CLIENT PROJECT #: _____ PROJECT MANAGER: <u>Jerry Sawetz</u>	DATE: <u>7/21/11</u> PAGE <u>1</u> OF <u>2</u> PROJECT NAME: <u>Acro wood</u> LOCATION: <u>Everett, WA</u> COLLECTOR: <u>Jerry Sawetz</u> DATE OF COLLECTION <u>7/21/11</u>
---	--

Sample Number	Depth	Time	Sample Type	Container Type	ANALYSES																Total Number of Containers	Laboratory Note Number
					TPH-HCD	TPH-DIESEL & OIL	TPH-GASOLINE	BTEX	VOC 2200CL	VOC 2200	Semivol 8270	PAHs 8270	PCBs 8002	CL Pesticides 8001	MTCA 8 Metals	Pb	Asbestos-PLM	GRO Suite	DRO Suite	WFO Suite		
1.ECIA3MW-5:4	4	1000	Soil	4oz																		
2.ECIA3MW-5:8	8	1005	Soil																			
3.ECIA3MW-5:12	12	1010	Soil																			
4.ECIA3B-1:4	4	1116	Soil																			
5.ECIA3B-1:8	8	1115	Soil																			
6.ECIA3B-1:12	12	1125	Soil	↓																		
7.ECIA3B-1GW		1155	GW	500ml																		
8.ECIA3B-2:4	4	1215	Soil	4oz																		
9.ECIA3B-2:8	8	1220	Soil																			
10.ECIA3B-2:12	12	1225	Soil																			
11.ECIA3B-2:16	16	1230	Soil																			
12.ECIA3B-2:17	17	1245	Soil																			
13.ECIA3B-2:20	20	1255	Soil	↓																		
14.ECIA3B-2GW		1310	GW	500ml																		
15.ECIA3B-3:4	4	1320	Soil	4oz																		
16.ECIA3B-3:12	12	1325	Soil																			
17.ECIA3B-3:16	16	1330	Soil																			
18.ECIA3B-3:20	20	1340	Soil	↓																		

RELINQUISHED BY (Signature) <u>[Signature]</u> RELINQUISHED BY (Signature) _____	DATE/TIME <u>7/21/11</u> DATE/TIME _____	RECEIVED BY (Signature) <u>[Signature]</u> RECEIVED BY (Signature) _____	DATE/TIME <u>7/21/11 1630</u> DATE/TIME _____	SAMPLE RECEIPT TOTAL NUMBER OF CONTAINERS _____ CHAIN OF CUSTODY SEALS Y/N/NA _____ SEALS INTACT? Y/N/NA _____ RECEIVED GOOD COND./COLD _____ NOTES: _____	LABORATORY NOTES: Turn Around Time: 24 HR 48 HR 5 DAY
SAMPLE DISPOSAL INSTRUCTIONS <input type="checkbox"/> ESN DISPOSAL @ \$2.00 each <input type="checkbox"/> Return <input type="checkbox"/> Pickup					

CHAIN-OF-CUSTODY RECORD

 CLIENT: Ecocon, Inc.

 DATE: _____ PAGE 2 OF 2

ADDRESS: _____

PROJECT NAME: _____

 PHONE: SAME AS PAGE 1 FAX: _____

LOCATION: _____

CLIENT PROJECT #: _____ PROJECT MANAGER: _____

COLLECTOR: _____ DATE OF COLLECTION: _____

Sample Number	Depth	Time	Sample Type	Container Type	ANALYSES																NOTES	Total Number of Containers	Laboratory Note Number																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																														
					TPH-HCD	TPH - DIESEL & OIL	TPH - GASOLINE	STEX	VOC 8260CL	VOC 8260	SemVol 8270	PAH's 8270	PCP's 8062	CL Pesticides 8061	MTCA 8 Metals	Pb	Asbestos-PLM	GRO Suite	DRO Suite	WFO Suite																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																	
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 RELINQUISHED BY (Signature) [Signature] DATE/TIME 7/27/11 RECEIVED BY (Signature) [Signature] DATE/TIME 7/27/11 1630

SAMPLE RECEIPT

TOTAL NUMBER OF CONTAINERS _____

CHAIN OF CUSTODY SEALS Y/N/NA _____

SEALS INTACT? Y/N/NA _____

RECEIVED GOOD COND./COLD _____

NOTES: _____

LABORATORY NOTES:

Turn Around Time: 24 HR 48 HR 5 DAY

SAMPLE DISPOSAL INSTRUCTIONS

☐ ESN DISPOSAL @ \$2.00 each ☐ Return ☐ Pickup

ESN NORTHWEST CHEMISTRY LABORATORY

EcoCon
ACROWOOD PROJECT
Everett, Washington

ESN Northwest
1210 Eastside Street SE Suite 200
Olympia, WA 98501
(360) 459-4670 (360) 459-3432 Fax
lab@esnnw.com

**Analysis of Diesel Range Organics & Lube Oil Range Organics in Water
by Method NWTPH-Dx/Dx Extended with Silica Gel Cleanup**

Sample Number	Date Prepared	Date Analyzed	Surrogate Recovery (%)	Diesel Range Organics (ug/L)	Lube Oil Range Organics (ug/L)
Method Blank	7/27/2011	7/28/2011	86%	nd	nd
ECIA3B-1GW	7/27/2011	7/28/2011	97%	nd	nd
ECIA3B-2GW	7/27/2011	7/28/2011	86%	920	nd
ECIA3B-3GW	7/27/2011	7/28/2011	104%	nd	nd
ECIA2B-1GW	7/27/2011	7/28/2011	85%	nd	nd
ECIA2B-2GW	7/27/2011	7/28/2011	86%	nd	nd
Reporting Limits				250	500

"nd" Indicates not detected at the listed detection limits.

"int" Indicates that interference prevents determination.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE : 50% TO 150%

ESN NORTHWEST CHEMISTRY LABORATORY

EcoCon
ACROWOOD PROJECT
Everett, Washington

ESN Northwest
1210 Eastside Street SE Suite 200
Olympia, WA 98501
(360) 459-4670 (360) 459-3432 Fax
lab@esnsw.com

**Analysis of Diesel Range Organics & Lube Oil Range Organics in Soil
by Method NWTPH-Dx/Dx Extended with Silica Gel Cleanup**

Sample Number	Date Prepared	Date Analyzed	Surrogate Recovery (%)	Diesel Range Organics (mg/kg)	Lube Oil Range Organics (mg/kg)
Method Blank	7/26/2011	7/26/2011	111	nd	nd
ECIA3B-1:4	7/26/2011	7/26/2011	101	nd	nd
ECIA3B-1:4 Duplicate	7/26/2011	7/26/2011	126	nd	nd
ECIA3B-1:12	7/26/2011	7/26/2011	118	nd	nd
ECIA3B-2:8	7/26/2011	7/26/2011	85	nd	nd
ECIA3B-2:12	7/26/2011	7/26/2011	Int	31000	2600
ECIA3B-2:16	7/26/2011	7/26/2011	114	nd	nd
ECIA3B-2:17	7/26/2011	7/26/2011	129	250	nd
ECIA3B-2:20	7/26/2011	7/26/2011	121	nd	nd
ECIA3B-3:12	7/26/2011	7/26/2011	114	nd	200
ECIA3B-3:16	7/26/2011	7/26/2011	96	nd	nd
Reporting Limits				50	100

"nd" Indicates not detected at the listed detection limits.

"int" Indicates that interference prevents determination.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE : 50% TO 150%

Int-Surrogate recovery was not determined due to matrix interferences.



Environmental
Services Network

CHAIN-OF-CUSTODY RECORD

CLIENT: Ecocon, Inc.

ADDRESS: 1912 64th Ave Tacoma WA

PHONE: 253-238-9270 FAX: 253-369-6228

CLIENT PROJECT #: _____ PROJECT MANAGER: Jerry Sawetz

DATE: 7/21/11 PAGE 1 OF 2

PROJECT NAME: Acro wood

LOCATION: Everett, WA

COLLECTOR: Jerry Sawetz DATE OF COLLECTION 7/21/11

Sample Number	Depth	Time	Sample Type	Container Type	ANALYSES																Total Number of Containers	Laboratory Note Number
					TPH-HCD	TPH-DIESEL & OIL	TPH-GASOLINE	BTEX	VOC 6200CL	VOC 6200	SemiVol 6270	PAHs 6270	PCBs 6052	CL Pesticides 6051	MTCA 6 Metals	Pb	Asbestos-PLM	GRO Suite	DRO Suite	WFO Suite		
1.ECIA3MW-5:8	4	1000	Soil	4oz																		
2.ECIA3MW-5:8	8	1005	Soil																			
3.ECIA3MW-5:12	12	1010	Soil																			
4.ECIA3B-1:4	4	1110	Soil																			
5.ECIA3B-1:8	8	1115	Soil																			
6.ECIA3B-1:12	12	1125	Soil	↓																		
7.ECIA3B-1GW		1155	GW	500 ml																		
8.ECIA3B-2:4	4	1215	Soil	4oz																		
9.ECIA3B-2:8	8	1220	Soil																			
10.ECIA3B-2:12	12	1225	Soil																			
11.ECIA3B-2:16	16	1230	Soil																			
12.ECIA3B-2:17	17	1245	Soil																			
13.ECIA3B-2:20	20	1255	Soil	↓																		
14.ECIA3B-2GW		1310	GW	500 ml																		
15.ECIA3B-3:4	4	1320	Soil	4oz																		
16.ECIA3B-3:12	12	1325	Soil																			
17.ECIA3B-3:16	16	1330	Soil																			
18.ECIA3B-3:20	20	1340	Soil	↓																		

RELINQUISHED BY (Signature) _____ DATE/TIME _____ RECEIVED BY (Signature) _____ DATE/TIME _____

RELINQUISHED BY (Signature) Jerry Sawetz DATE/TIME 7/21/11 RECEIVED BY (Signature) Jerry Sawetz DATE/TIME 7/21/11 1630

SAMPLE RECEIPT

TOTAL NUMBER OF CONTAINERS _____

CHAIN OF CUSTODY SEALS Y/N/NA _____

SEALS INTACT? Y/N/NA _____

RECEIVED GOOD COND./COLD _____

NOTES: _____

LABORATORY NOTES:

Turn Around Time: 24 HR 48 HR 5 DAY

SAMPLE DISPOSAL INSTRUCTIONS

☐ ESN DISPOSAL @ \$2.00 each ☐ Return ☐ Pickup

CHAIN-OF-CUSTODY RECORD

CLIENT: Eco.com, Inc.

DATE: _____ PAGE 2 OF 2

ADDRESS: _____

PROJECT NAME: _____

PHONE: SAME AS PAGE 1 FAX: _____

LOCATION: _____

CLIENT PROJECT #: _____ PROJECT MANAGER: _____

COLLECTOR: _____ DATE OF COLLECTION: _____

Sample Number	Depth	Time	Sample Type	Container Type	ANALYSES																Total Number of Containers	Laboratory Note Number
					TPH-HCD	TPH-DIESEL & OIL	TPH-GASOLINE	BTEX	VOC 8260CL	VOC 8260	Semivol 8270	PAH's 8270	PCB's 8062	CL Pesticides 8061	MTCA 8 Metals	Pb	Asbestos-PLM	GRO Suite	DRO Suite	WO Suite		
1. ECT A3 R-3 GW		1400	GW	500ml																		
2. ECT A2 R-1 GW		1515	GW	↓																		
3. ECT A2 R-2 GW		1555	GW	↓																		
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RELINQUISHED BY (Signature) [Signature] DATE/TIME 7/27/11 RECEIVED BY (Signature) [Signature] DATE/TIME 7/21/11 1630

SAMPLE RECEIPT

TOTAL NUMBER OF CONTAINERS _____

CHAIN OF CUSTODY SEALS Y/N/A _____

SEALS INTACT? Y/N/A _____

RECEIVED GOOD COND./COLD _____

NOTES: _____

LABORATORY NOTES:

Turn Around Time: 24 HR 48 HR 5 DAY

SAMPLE DISPOSAL INSTRUCTIONS

☐ ESN DISPOSAL @ \$2.00 each ☐ Return ☐ Pickup

ESN NORTHWEST CHEMISTRY LABORATORY

EcoCon
ACROWOOD PROJECT
Everett, Washington

ESN Northwest
1210 Eastside Street SE Suite 200
Olympia, WA 98501
(360) 459-4670 (360) 459-3432 Fax
lab@esnvw.com

**Analysis of Diesel Range Organics & Lube Oil Range Organics in Water
by Method NWTPH-Dx/Dx Extended with Silica Gel Cleanup**

Sample Number	Date Prepared	Date Analyzed	Surrogate Recovery (%)	Diesel Range Organics (ug/L)	Lube Oil Range Organics (ug/L)
Method Blank	7/27/2011	7/28/2011	86%	nd	nd
ECIA3B-1GW	7/27/2011	7/28/2011	97%	nd	nd
ECIA3B-2GW	7/27/2011	7/28/2011	86%	920	nd
ECIA3B-3GW	7/27/2011	7/28/2011	104%	nd	nd
ECIA2B-1GW	7/27/2011	7/28/2011	85%	nd	nd
ECIA2B-2GW	7/27/2011	7/28/2011	86%	nd	nd
Reporting Limits				250	500

"nd" Indicates not detected at the listed detection limits.

"int" Indicates that interference prevents determination.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE : 50% TO 150%

ESN NORTHWEST CHEMISTRY LABORATORY

EcoCon
ACROWOOD PROJECT
Everett, Washington

ESN Northwest
1210 Eastside Street SE Suite 200
Olympia, WA 98501
(360) 459-4670 (360) 459-3432 Fax
lab@esnsw.com

**Analysis of Diesel Range Organics & Lube Oil Range Organics in Soil
by Method NWTPH-Dx/Dx Extended with Silica Gel Cleanup**

Sample Number	Date Prepared	Date Analyzed	Surrogate Recovery (%)	Diesel Range Organics (mg/kg)	Lube Oil Range Organics (mg/kg)
Method Blank	7/26/2011	7/26/2011	111	nd	nd
ECIA3B-1:4	7/26/2011	7/26/2011	101	nd	nd
ECIA3B-1:4 Duplicate	7/26/2011	7/26/2011	126	nd	nd
ECIA3B-1:12	7/26/2011	7/26/2011	118	nd	nd
ECIA3B-2:8	7/26/2011	7/26/2011	85	nd	nd
ECIA3B-2:12	7/26/2011	7/26/2011	Int	31000	2600
ECIA3B-2:16	7/26/2011	7/26/2011	114	nd	nd
ECIA3B-2:17	7/26/2011	7/26/2011	129	250	nd
ECIA3B-2:20	7/26/2011	7/26/2011	121	nd	nd
ECIA3B-3:12	7/26/2011	7/26/2011	114	nd	200
ECIA3B-3:16	7/26/2011	7/26/2011	96	nd	nd
Reporting Limits				50	100

"nd" Indicates not detected at the listed detection limits.

"int" Indicates that interference prevents determination.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE : 50% TO 150%

Int-Surrogate recovery was not determined due to matrix interferences.



September 2, 2011

Mr. Jerry Sawetz
ECI
1912 - 64th Ave W.
Tacoma, WA 98466

Dear Mr. Sawetz,

On August 26th, 3 samples were received by our laboratory and assigned our laboratory project number 1108120. The project was identified as your Acrowood. The sample identification and requested analyses are outlined on the attached chain of custody record.

No abnormalities or nonconformances were observed during the analyses of the project samples.

Please do not hesitate to call me if you have any questions or if I can be of further assistance.

Sincerely,

ALS Laboratory Group

Rick Bagan
Laboratory Director



CERTIFICATE OF ANALYSIS

CLIENT: ECI
1912 - 64th Ave W.
Tacoma, WA 98466

CLIENT CONTACT: Jerry Sawetz
CLIENT PROJECT: Acrowood
CLIENT SAMPLE ID: ECIMW-5

DATE: 9/2/2011
ALS JOB#: 1108120
ALS SAMPLE#: -01
DATE RECEIVED: 8/26/2011
COLLECTION DATE: 8/25/2011 13:30
WDOE ACCREDITATION: C601

DATA RESULTS

ANALYTE	METHOD	RESULTS	REPORTING LIMITS	DILUTION FACTOR	UNITS	ANALYSIS DATE	ANALYSIS BY
TPH-Diesel Range	NWTPH-DX	U	130	1	UG/L	08/26/2011	EBS
TPH-Oil Range	NWTPH-DX	U	250	1	UG/L	08/26/2011	EBS
Naphthalene	EPA-8270 SIM	U	0.020	1	UG/L	08/30/2011	LAP
2-Methylnaphthalene	EPA-8270 SIM	U	0.020	1	UG/L	08/30/2011	LAP
1-Methylnaphthalene	EPA-8270 SIM	U	0.020	1	UG/L	08/30/2011	LAP
Acenaphthylene	EPA-8270 SIM	U	0.020	1	UG/L	08/30/2011	LAP
Acenaphthene	EPA-8270 SIM	U	0.020	1	UG/L	08/30/2011	LAP
Fluorene	EPA-8270 SIM	U	0.020	1	UG/L	08/30/2011	LAP
Phenanthrene	EPA-8270 SIM	U	0.020	1	UG/L	08/30/2011	LAP
Anthracene	EPA-8270 SIM	U	0.020	1	UG/L	08/30/2011	LAP
Fluoranthene	EPA-8270 SIM	0.036	0.020	1	UG/L	08/30/2011	LAP
Pyrene	EPA-8270 SIM	0.034	0.020	1	UG/L	08/30/2011	LAP
Benzo[A]Anthracene	EPA-8270 SIM	0.030	0.020	1	UG/L	08/30/2011	LAP
Chrysene	EPA-8270 SIM	0.041	0.020	1	UG/L	08/30/2011	LAP
Benzo[B]Fluoranthene	EPA-8270 SIM	0.048	0.020	1	UG/L	08/30/2011	LAP
Benzo[K]Fluoranthene	EPA-8270 SIM	0.030	0.020	1	UG/L	08/30/2011	LAP
Benzo[A]Pyrene	EPA-8270 SIM	0.032	0.020	1	UG/L	08/30/2011	LAP
Indeno[1,2,3-Cd]Pyrene	EPA-8270 SIM	0.028	0.020	1	UG/L	08/30/2011	LAP
Dibenz[A,H]Anthracene	EPA-8270 SIM	U	0.020	1	UG/L	08/30/2011	LAP
Benzo[G,H,I]Perylene	EPA-8270 SIM	0.036	0.020	1	UG/L	08/30/2011	LAP

SURROGATE	METHOD	%REC	ANALYSIS DATE	ANALYSIS BY
C25	NWTPH-DX	94.2	08/26/2011	EBS
Terphenyl-d14	EPA-8270 SIM	109	08/30/2011	LAP

U - Analyte analyzed for but not detected at level above reporting limit.

**CERTIFICATE OF ANALYSIS**

CLIENT: ECI
1912 - 64th Ave W.
Tacoma, WA 98466

CLIENT CONTACT: Jerry Sawetz
CLIENT PROJECT: Acrowood
CLIENT SAMPLE ID: MW-1

DATE: 9/2/2011
ALS JOB#: 1108120
ALS SAMPLE#: -02
DATE RECEIVED: 8/26/2011
COLLECTION DATE: 8/25/2011 14:45
WDOE ACCREDITATION: C601

DATA RESULTS

ANALYTE	METHOD	RESULTS	REPORTING LIMITS	DILUTION FACTOR	UNITS	ANALYSIS DATE	ANALYSIS BY
TPH-Diesel Range	NWTPH-DX	U	130	1	UG/L	08/26/2011	EBS
TPH-Oil Range	NWTPH-DX	U	250	1	UG/L	08/26/2011	EBS
Naphthalene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
2-Methylnaphthalene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
1-Methylnaphthalene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
Acenaphthylene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
Acenaphthene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
Fluorene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
Phenanthrene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
Anthracene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
Fluoranthene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
Pyrene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
Benzo[A]Anthracene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
Chrysene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
Benzo[B]Fluoranthene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
Benzo[K]Fluoranthene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
Benzo[A]Pyrene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
Indeno[1,2,3-Cd]Pyrene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
Dibenz[A,H]Anthracene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
Benzo[G,H,I]Perylene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP

SURROGATE	METHOD	%REC	ANALYSIS DATE	ANALYSIS BY
C25	NWTPH-DX	75.6	08/26/2011	EBS
Terphenyl-d14	EPA-8270 SIM	112	08/31/2011	LAP

U - Analyte analyzed for but not detected at level above reporting limit.



CERTIFICATE OF ANALYSIS

CLIENT: ECI
1912 - 64th Ave W.
Tacoma, WA 98466

CLIENT CONTACT: Jerry Sawetz
CLIENT PROJECT: Acrowood
CLIENT SAMPLE ID: MW-4

DATE: 9/2/2011
ALS JOB#: 1108120
ALS SAMPLE#: -03
DATE RECEIVED: 8/26/2011
COLLECTION DATE: 8/25/2011 16:30
WDOE ACCREDITATION: C601

DATA RESULTS

			REPORTING	DILUTION		ANALYSIS	ANALYSIS
ANALYTE	METHOD	RESULTS	LIMITS	FACTOR	UNITS	DATE	BY
TPH-Diesel Range	NWTPH-DX	U	130	1	UG/L	08/26/2011	EBS
TPH-Oil Range	NWTPH-DX	U	250	1	UG/L	08/26/2011	EBS
Naphthalene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
2-Methylnaphthalene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
1-Methylnaphthalene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
Acenaphthylene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
Acenaphthene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
Fluorene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
Phenanthrene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
Anthracene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
Fluoranthene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
Pyrene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
Benzo[A]Anthracene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
Chrysene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
Benzo[B]Fluoranthene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
Benzo[K]Fluoranthene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
Benzo[A]Pyrene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
Indeno[1,2,3-Cd]Pyrene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
Dibenz[A,H]Anthracene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
Benzo[G,H,I]Perylene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
SURROGATE	METHOD	%REC				ANALYSIS	ANALYSIS
						DATE	BY
C25	NWTPH-DX	73.2				08/26/2011	EBS
Terphenyl-d14	EPA-8270 SIM	113				08/31/2011	LAP



CERTIFICATE OF ANALYSIS

CLIENT: ECI
1912 - 64th Ave W.
Tacoma, WA 98466

DATE: 9/2/2011
ALS SDG#: 1108120
WDOE ACCREDITATION: C601

CLIENT CONTACT: Jerry Sawetz
CLIENT PROJECT: Acrowood

LABORATORY BLANK RESULTS

MB-082411W - Batch 2048 - Water by NWTPH-DX

ANALYTE	METHOD	RESULTS	REPORTING LIMITS	DILUTION FACTOR	UNITS	ANALYSIS DATE	ANALYSIS BY
TPH-Diesel Range	NWTPH-DX	U	130	1	UG/L	08/24/2011	EBS
TPH-Oil Range	NWTPH-DX	U	250	1	UG/L	08/24/2011	EBS

MB-082411W - Batch 2049 - Water by EPA-8270 SIM

ANALYTE	METHOD	RESULTS	REPORTING LIMITS	DILUTION FACTOR	UNITS	ANALYSIS DATE	ANALYSIS BY
Naphthalene	EPA-8270 SIM	U	0.020	1	UG/L	08/26/2011	LAP
2-Methylnaphthalene	EPA-8270 SIM	U	0.020	1	UG/L	08/26/2011	LAP
1-Methylnaphthalene	EPA-8270 SIM	U	0.020	1	UG/L	08/26/2011	LAP
Acenaphthylene	EPA-8270 SIM	U	0.020	1	UG/L	08/26/2011	LAP
Acenaphthene	EPA-8270 SIM	U	0.020	1	UG/L	08/26/2011	LAP
Fluorene	EPA-8270 SIM	U	0.020	1	UG/L	08/26/2011	LAP
Phenanthrene	EPA-8270 SIM	U	0.020	1	UG/L	08/26/2011	LAP
Anthracene	EPA-8270 SIM	U	0.020	1	UG/L	08/26/2011	LAP
Fluoranthene	EPA-8270 SIM	U	0.020	1	UG/L	08/26/2011	LAP
Pyrene	EPA-8270 SIM	U	0.020	1	UG/L	08/26/2011	LAP
Benzo[A]Anthracene	EPA-8270 SIM	U	0.020	1	UG/L	08/26/2011	LAP
Chrysene	EPA-8270 SIM	U	0.020	1	UG/L	08/26/2011	LAP
Benzo[B]Fluoranthene	EPA-8270 SIM	U	0.020	1	UG/L	08/26/2011	LAP
Benzo[K]Fluoranthene	EPA-8270 SIM	U	0.020	1	UG/L	08/26/2011	LAP
Benzo[A]Pyrene	EPA-8270 SIM	U	0.020	1	UG/L	08/26/2011	LAP
Indeno[1,2,3-Cd]Pyrene	EPA-8270 SIM	U	0.020	1	UG/L	08/26/2011	LAP
Dibenz[A,H]Anthracene	EPA-8270 SIM	U	0.020	1	UG/L	08/26/2011	LAP
Benzo[G,H,I]Perylene	EPA-8270 SIM	U	0.020	1	UG/L	08/26/2011	LAP

**CERTIFICATE OF ANALYSIS**

CLIENT: ECI
1912 - 64th Ave W.
Tacoma, WA 98466

DATE: 9/2/2011
ALS SDG#: 1108120
WDOE ACCREDITATION: C601

CLIENT CONTACT: Jerry Sawetz
CLIENT PROJECT: Acrowood

LABORATORY CONTROL SAMPLE RESULTS**ALS Test Batch ID: 2048 - Water by NWTPH-DX**

SPIKED COMPOUND	METHOD	%REC	RPD	QUAL	ANALYSIS DATE	ANALYSIS BY
TPH-Diesel Range - BS	NWTPH-DX	92.1			08/24/2011	EBS
TPH-Diesel Range - BSD	NWTPH-DX	87.7	5		08/24/2011	EBS

ALS Test Batch ID: 2049 - Water by EPA-8270 SIM

SPIKED COMPOUND	METHOD	%REC	RPD	QUAL	ANALYSIS DATE	ANALYSIS BY
Naphthalene - BS	EPA-8270 SIM	63.4			08/25/2011	LAP
Naphthalene - BSD	EPA-8270 SIM	57.8	9		08/25/2011	LAP
Acenaphthene - BS	EPA-8270 SIM	73.1			08/25/2011	LAP
Acenaphthene - BSD	EPA-8270 SIM	71.0	3		08/25/2011	LAP
Pyrene - BS	EPA-8270 SIM	71.0			08/25/2011	LAP
Pyrene - BSD	EPA-8270 SIM	73.4	3		08/25/2011	LAP
Benzo[G,H,I]Perylene - BS	EPA-8270 SIM	67.2			08/25/2011	LAP
Benzo[G,H,I]Perylene - BSD	EPA-8270 SIM	70.4	5		08/25/2011	LAP

APPROVED BY

Laboratory Director



ALS Environmental
 8620 Holly Drive, Suite 100
 Everett, WA 98208
 Phone (425) 356-2600
 (206) 292-9059 Seattle
 (425) 356-2626 Fax
 http://www.alsglobal.com

Chain Of Custody/ Laboratory Analysis Request

ALS Job# (Laboratory Use Only)

1108120

Date 8/25/11 Page 1 Of 1

PROJECT ID: Acrowood					ANALYSIS REQUESTED										OTHER (Specify)																
REPORT TO COMPANY: ECI																															
PROJECT MANAGER: Jerry Sawetz																															
ADDRESS: 1912 64th Ave W																															
Tacoma WA 98466																															
PHONE: 425-301-1227 FAX: 253-369-6228																															
PO. NUMBER:					E-MAIL: jerry.s@eciconline.com																										
INVOICE TO COMPANY: SAME																															
ATTENTION: Steve Spencer																															
ADDRESS:																															
SAMPLE I.D.	DATE	TIME	TYPE	LAB#	NWTPH-HCID	NWTPH-DX	NWTPH-GX	BTEX by EPA-8021	MTBE by EPA-8021	EPA-8260	Halogenated Volatiles by EPA 8260	Volatile Organic Compounds by EPA 8260	EDB / EDC by EPA 8260 SIM (water)	EDB / EDC by EPA 8260 (soil)	Semivolatile Organic Compounds by EPA 8270	Polycyclic Aromatic Hydrocarbons (PAH) by EPA-8270 SIM	PCB	Pesticides by EPA 8081/8082	Metals-MTCA-5	RCRA-8	Pri Pol	TAL	Metals Other (Specify)	TCLP-Metals	VOA	Semi-Vol	Pest	Herbs	NUMBER OF CONTAINERS	RECEIVED IN GOOD CONDITION?	
1. ECIMW-5	8/25/11	1330	GW	1		X										X															X
2. MW-1		1445	GW	2		X										X															X
3. MW-4		1630	GW	3		X										X															X
4.																															
5.																															
6.																															
7.																															
8.																															
9.																															
10.																															

SPECIAL INSTRUCTIONS

SIGNATURES (Name, Company, Date, Time):

1. Relinquished By:

Received By:

2. Relinquished By:

Received By:

ECI
8/25/11 5:45

TURNAROUND REQUESTED in Business Days*

Organic, Metals & Inorganic Analysis

OTHER:

Specify:

<input checked="" type="checkbox"/> Standard	5	3	2	1	SAME DAY
<input type="checkbox"/> Rush	5	3	1	SAME DAY	

Fuels & Hydrocarbon Analysis

* Turnaround request less than standard may incur Rush Charges

LABORATORY COPY



September 2, 2011

Mr. Jerry Sawetz
ECI
1912 - 64th Ave W.
Tacoma, WA 98466

Dear Mr. Sawetz,

On August 26th, 3 samples were received by our laboratory and assigned our laboratory project number 1108120. The project was identified as your Acrowood. The sample identification and requested analyses are outlined on the attached chain of custody record.

No abnormalities or nonconformances were observed during the analyses of the project samples.

Please do not hesitate to call me if you have any questions or if I can be of further assistance.

Sincerely,

ALS Laboratory Group

Rick Bagan
Laboratory Director



CERTIFICATE OF ANALYSIS

CLIENT: ECI
1912 - 64th Ave W.
Tacoma, WA 98466

CLIENT CONTACT: Jerry Sawetz
CLIENT PROJECT: Acrowood
CLIENT SAMPLE ID: ECIMW-5

DATE: 9/2/2011
ALS JOB#: 1108120
ALS SAMPLE#: -01
DATE RECEIVED: 8/26/2011
COLLECTION DATE: 8/25/2011 13:30
WDOE ACCREDITATION: C601

DATA RESULTS

ANALYTE	METHOD	RESULTS	REPORTING LIMITS	DILUTION FACTOR	UNITS	ANALYSIS DATE	ANALYSIS BY
TPH-Diesel Range	NWTPH-DX	U	130	1	UG/L	08/26/2011	EBS
TPH-Oil Range	NWTPH-DX	U	250	1	UG/L	08/26/2011	EBS
Naphthalene	EPA-8270 SIM	U	0.020	1	UG/L	08/30/2011	LAP
2-Methylnaphthalene	EPA-8270 SIM	U	0.020	1	UG/L	08/30/2011	LAP
1-Methylnaphthalene	EPA-8270 SIM	U	0.020	1	UG/L	08/30/2011	LAP
Acenaphthylene	EPA-8270 SIM	U	0.020	1	UG/L	08/30/2011	LAP
Acenaphthene	EPA-8270 SIM	U	0.020	1	UG/L	08/30/2011	LAP
Fluorene	EPA-8270 SIM	U	0.020	1	UG/L	08/30/2011	LAP
Phenanthrene	EPA-8270 SIM	U	0.020	1	UG/L	08/30/2011	LAP
Anthracene	EPA-8270 SIM	U	0.020	1	UG/L	08/30/2011	LAP
Fluoranthene	EPA-8270 SIM	0.036	0.020	1	UG/L	08/30/2011	LAP
Pyrene	EPA-8270 SIM	0.034	0.020	1	UG/L	08/30/2011	LAP
Benzo[A]Anthracene	EPA-8270 SIM	0.030	0.020	1	UG/L	08/30/2011	LAP
Chrysene	EPA-8270 SIM	0.041	0.020	1	UG/L	08/30/2011	LAP
Benzo[B]Fluoranthene	EPA-8270 SIM	0.048	0.020	1	UG/L	08/30/2011	LAP
Benzo[K]Fluoranthene	EPA-8270 SIM	0.030	0.020	1	UG/L	08/30/2011	LAP
Benzo[A]Pyrene	EPA-8270 SIM	0.032	0.020	1	UG/L	08/30/2011	LAP
Indeno[1,2,3-Cd]Pyrene	EPA-8270 SIM	0.028	0.020	1	UG/L	08/30/2011	LAP
Dibenz[A,H]Anthracene	EPA-8270 SIM	U	0.020	1	UG/L	08/30/2011	LAP
Benzo[G,H,I]Perylene	EPA-8270 SIM	0.036	0.020	1	UG/L	08/30/2011	LAP

SURROGATE	METHOD	%REC	ANALYSIS DATE	ANALYSIS BY
C25	NWTPH-DX	94.2	08/26/2011	EBS
Terphenyl-d14	EPA-8270 SIM	109	08/30/2011	LAP

U - Analyte analyzed for but not detected at level above reporting limit.



CERTIFICATE OF ANALYSIS

CLIENT: ECI
1912 - 64th Ave W.
Tacoma, WA 98466

CLIENT CONTACT: Jerry Sawetz
CLIENT PROJECT: Acrowood
CLIENT SAMPLE ID: MW-1

DATE: 9/2/2011
ALS JOB#: 1108120
ALS SAMPLE#: -02
DATE RECEIVED: 8/26/2011
COLLECTION DATE: 8/25/2011 14:45
WDOE ACCREDITATION: C601

DATA RESULTS

ANALYTE	METHOD	RESULTS	REPORTING LIMITS	DILUTION FACTOR	UNITS	ANALYSIS DATE	ANALYSIS BY
TPH-Diesel Range	NWTPH-DX	U	130	1	UG/L	08/26/2011	EBS
TPH-Oil Range	NWTPH-DX	U	250	1	UG/L	08/26/2011	EBS
Naphthalene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
2-Methylnaphthalene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
1-Methylnaphthalene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
Acenaphthylene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
Acenaphthene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
Fluorene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
Phenanthrene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
Anthracene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
Fluoranthene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
Pyrene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
Benzo[A]Anthracene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
Chrysene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
Benzo[B]Fluoranthene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
Benzo[K]Fluoranthene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
Benzo[A]Pyrene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
Indeno[1,2,3-Cd]Pyrene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
Dibenz[A,H]Anthracene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
Benzo[G,H,I]Perylene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP

SURROGATE	METHOD	%REC	ANALYSIS DATE	ANALYSIS BY
C25	NWTPH-DX	75.6	08/26/2011	EBS
Terphenyl-d14	EPA-8270 SIM	112	08/31/2011	LAP

U - Analyte analyzed for but not detected at level above reporting limit.



CERTIFICATE OF ANALYSIS

CLIENT: ECI
1912 - 64th Ave W.
Tacoma, WA 98466

CLIENT CONTACT: Jerry Sawetz
CLIENT PROJECT: Acrowood
CLIENT SAMPLE ID: MW-4

DATE: 9/2/2011
ALS JOB#: 1108120
ALS SAMPLE#: -03
DATE RECEIVED: 8/26/2011
COLLECTION DATE: 8/25/2011 16:30
WDOE ACCREDITATION: C601

DATA RESULTS

ANALYTE	METHOD	RESULTS	REPORTING LIMITS	DILUTION FACTOR	UNITS	ANALYSIS DATE	ANALYSIS BY
TPH-Diesel Range	NWTPH-DX	U	130	1	UG/L	08/26/2011	EBS
TPH-Oil Range	NWTPH-DX	U	250	1	UG/L	08/26/2011	EBS
Naphthalene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
2-Methylnaphthalene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
1-Methylnaphthalene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
Acenaphthylene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
Acenaphthene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
Fluorene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
Phenanthrene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
Anthracene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
Fluoranthene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
Pyrene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
Benzo[A]Anthracene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
Chrysene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
Benzo[B]Fluoranthene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
Benzo[K]Fluoranthene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
Benzo[A]Pyrene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
Indeno[1,2,3-Cd]Pyrene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
Dibenz[A,H]Anthracene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP
Benzo[G,H,I]Perylene	EPA-8270 SIM	U	0.020	1	UG/L	08/31/2011	LAP

SURROGATE	METHOD	%REC	ANALYSIS DATE	ANALYSIS BY
C25	NWTPH-DX	73.2	08/26/2011	EBS
Terphenyl-d14	EPA-8270 SIM	113	08/31/2011	LAP

U - Analyte analyzed for but not detected at level above reporting limit.

**CERTIFICATE OF ANALYSIS**

CLIENT: ECI
1912 - 64th Ave W.
Tacoma, WA 98466
CLIENT CONTACT: Jerry Sawetz
CLIENT PROJECT: Acrowood

DATE: 9/2/2011
ALS SDG#: 1108120
WDOE ACCREDITATION: C601

LABORATORY BLANK RESULTS**MB-082411W - Batch 2048 - Water by NWTPH-DX**

ANALYTE	METHOD	RESULTS	REPORTING LIMITS	DILUTION FACTOR	UNITS	ANALYSIS DATE	ANALYSIS BY
TPH-Diesel Range	NWTPH-DX	U	130	1	UG/L	08/24/2011	EBS
TPH-Oil Range	NWTPH-DX	U	250	1	UG/L	08/24/2011	EBS

MB-082411W - Batch 2049 - Water by EPA-8270 SIM

ANALYTE	METHOD	RESULTS	REPORTING LIMITS	DILUTION FACTOR	UNITS	ANALYSIS DATE	ANALYSIS BY
Naphthalene	EPA-8270 SIM	U	0.020	1	UG/L	08/26/2011	LAP
2-Methylnaphthalene	EPA-8270 SIM	U	0.020	1	UG/L	08/26/2011	LAP
1-Methylnaphthalene	EPA-8270 SIM	U	0.020	1	UG/L	08/26/2011	LAP
Acenaphthylene	EPA-8270 SIM	U	0.020	1	UG/L	08/26/2011	LAP
Acenaphthene	EPA-8270 SIM	U	0.020	1	UG/L	08/26/2011	LAP
Fluorene	EPA-8270 SIM	U	0.020	1	UG/L	08/26/2011	LAP
Phenanthrene	EPA-8270 SIM	U	0.020	1	UG/L	08/26/2011	LAP
Anthracene	EPA-8270 SIM	U	0.020	1	UG/L	08/26/2011	LAP
Fluoranthene	EPA-8270 SIM	U	0.020	1	UG/L	08/26/2011	LAP
Pyrene	EPA-8270 SIM	U	0.020	1	UG/L	08/26/2011	LAP
Benzo[A]Anthracene	EPA-8270 SIM	U	0.020	1	UG/L	08/26/2011	LAP
Chrysene	EPA-8270 SIM	U	0.020	1	UG/L	08/26/2011	LAP
Benzo[B]Fluoranthene	EPA-8270 SIM	U	0.020	1	UG/L	08/26/2011	LAP
Benzo[K]Fluoranthene	EPA-8270 SIM	U	0.020	1	UG/L	08/26/2011	LAP
Benzo[A]Pyrene	EPA-8270 SIM	U	0.020	1	UG/L	08/26/2011	LAP
Indeno[1,2,3-Cd]Pyrene	EPA-8270 SIM	U	0.020	1	UG/L	08/26/2011	LAP
Dibenz[A,H]Anthracene	EPA-8270 SIM	U	0.020	1	UG/L	08/26/2011	LAP
Benzo[G,H,I]Perylene	EPA-8270 SIM	U	0.020	1	UG/L	08/26/2011	LAP

**CERTIFICATE OF ANALYSIS**

CLIENT: ECI
1912 - 64th Ave W.
Tacoma, WA 98466
CLIENT CONTACT: Jerry Sawetz
CLIENT PROJECT: Acrowood

DATE: 9/2/2011
ALS SDG#: 1108120
WDOE ACCREDITATION: C601

LABORATORY CONTROL SAMPLE RESULTS**ALS Test Batch ID: 2048 - Water by NWTPH-DX**

SPIKED COMPOUND	METHOD	%REC	RPD	QUAL	ANALYSIS DATE	ANALYSIS BY
TPH-Diesel Range - BS	NWTPH-DX	92.1			08/24/2011	EBS
TPH-Diesel Range - BSD	NWTPH-DX	87.7	5		08/24/2011	EBS

ALS Test Batch ID: 2049 - Water by EPA-8270 SIM

SPIKED COMPOUND	METHOD	%REC	RPD	QUAL	ANALYSIS DATE	ANALYSIS BY
Naphthalene - BS	EPA-8270 SIM	63.4			08/25/2011	LAP
Naphthalene - BSD	EPA-8270 SIM	57.8	9		08/25/2011	LAP
Acenaphthene - BS	EPA-8270 SIM	73.1			08/25/2011	LAP
Acenaphthene - BSD	EPA-8270 SIM	71.0	3		08/25/2011	LAP
Pyrene - BS	EPA-8270 SIM	71.0			08/25/2011	LAP
Pyrene - BSD	EPA-8270 SIM	73.4	3		08/25/2011	LAP
Benzo[G,H,I]Perylene - BS	EPA-8270 SIM	67.2			08/25/2011	LAP
Benzo[G,H,I]Perylene - BSD	EPA-8270 SIM	70.4	5		08/25/2011	LAP

APPROVED BY

Laboratory Director



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8620 Holly Drive, Suite 100
Everett, WA 98208
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(425) 356-2626 Fax
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Chain Of Custody/ Laboratory Analysis Request

ALS Job# (Laboratory Use Only)

1108120

Date 8/25/11 Page 1 Of 1

PROJECT ID: Acrowood REPORT TO COMPANY: ECI PROJECT MANAGER: Jerry Sawetz ADDRESS: 1912 64th Ave W Tacoma WA 98466 PHONE: 425-301-1227 FAX: 253-369-6228 PO. NUMBER: E-MAIL: jerry.s@eciconline.com INVOICE TO COMPANY: SAME ATTENTION: Steve Spencer ADDRESS:					ANALYSIS REQUESTED										OTHER (Specify)																			
					NWTPH-HCID	NWTPH-DX	NWTPH-GX	BTEX by EPA-8021	MTBE by EPA-8021	EPA-8260	Halogenated Volatiles by EPA 8260	Volatile Organic Compounds by EPA 8260	EDB / EDC by EPA 8260 SIM (water)	EDB / EDC by EPA 8260 (soil)	Semivolatile Organic Compounds by EPA 8270	Polycyclic Aromatic Hydrocarbons (PAH) by EPA-8270 SIM	PCB	Pesticides by EPA 8081/8082	Metals-MTCA-5	RCRA-8	Pri Pol	TAL	Metals Other (Specify)	TCLP-Metals	VOA	Semi-Vol	Pest	Herbs	NUMBER OF CONTAINERS RECEIVED IN GOOD CONDITION?					
SAMPLE I.D.					DATE					TIME					TYPE					LAB#														
1. ECIMW-5					8/25/11					1330					GW					1					X									
2. MW-1										1445					GW					2					X									
3. MW-4										1630					GW					3					X									
4.																																		
5.																																		
6.																																		
7.																																		
8.																																		
9.																																		
10.																																		

SPECIAL INSTRUCTIONS

SIGNATURES (Name, Company, Date, Time):

1. Relinquished By:

Received By:

2. Relinquished By:

Received By:

ECI
8/25/11 5:45

TURNAROUND REQUESTED in Business Days*

Organic, Metals & Inorganic Analysis

OTHER:

Specify:

Standard 5 3 2 1 SAME DAY

Fuels & Hydrocarbon Analysis

Standard 5 3 1 SAME DAY

* Turnaround request less than standard may incur Rush Charges



CERTIFICATE OF ANALYSIS

CLIENT:	ECI	DATE:	8/29/2011
	1912 - 64th Ave W.	ALS JOB#:	1108119
	Tacoma, WA 98466	ALS SAMPLE#:	-01
CLIENT CONTACT:	Jerry Sawetz	DATE RECEIVED:	8/26/2011
CLIENT PROJECT:	Acrowood	COLLECTION DATE:	8/25/2011 12:00
CLIENT SAMPLE ID	DC-1	WDOE ACCREDITATION:	C601

DATA RESULTS

ANALYTE	METHOD	RESULTS	REPORTING LIMITS	DILUTION FACTOR	UNITS	ANALYSIS DATE	ANALYSIS BY
HCID-Gas Range	NWTPH-HCID	U	20	1	MG/KG	08/26/2011	EBS
HCID-Diesel Range	NWTPH-HCID	U	50	1	MG/KG	08/26/2011	EBS
HCID-Oil Range	NWTPH-HCID	>100	100	1	MG/KG	08/26/2011	EBS

SURROGATE	METHOD	%REC	ANALYSIS DATE	ANALYSIS BY
BCB	NWTPH-HCID	85.0	08/26/2011	EBS
C25	NWTPH-HCID	104	08/26/2011	EBS

U - Analyte analyzed for but not detected at level above reporting limit.
Chromatogram indicates that it is likely that sample contains lube oil.

**CERTIFICATE OF ANALYSIS**

CLIENT:	ECI	DATE:	8/29/2011
	1912 - 64th Ave W.	ALS JOB#:	1108119
	Tacoma, WA 98466	ALS SAMPLE#:	-02
CLIENT CONTACT:	Jerry Sawetz	DATE RECEIVED:	8/26/2011
CLIENT PROJECT:	Acrowood	COLLECTION DATE:	8/25/2011 12:10
CLIENT SAMPLE ID	DC-2	WDOE ACCREDITATION:	C601

DATA RESULTS

ANALYTE	METHOD	RESULTS	REPORTING LIMITS	DILUTION FACTOR	UNITS	ANALYSIS DATE	ANALYSIS BY
HCID-Gas Range	NWTPH-HCID	U	20	1	MG/KG	08/26/2011	EBS
HCID-Diesel Range	NWTPH-HCID	U	50	1	MG/KG	08/26/2011	EBS
HCID-Oil Range	NWTPH-HCID	>100	100	1	MG/KG	08/26/2011	EBS

SURROGATE	METHOD	%REC	ANALYSIS DATE	ANALYSIS BY
BCB	NWTPH-HCID	75.0	08/26/2011	EBS
C25	NWTPH-HCID	84.4	08/26/2011	EBS

U - Analyte analyzed for but not detected at level above reporting limit.
Chromatogram indicates that it is likely that sample contains lube oil.

**CERTIFICATE OF ANALYSIS**

CLIENT:	ECI	DATE:	8/29/2011
	1912 - 64th Ave W.	ALS JOB#:	1108119
	Tacoma, WA 98466	ALS SAMPLE#:	-03
CLIENT CONTACT:	Jerry Sawetz	DATE RECEIVED:	8/26/2011
CLIENT PROJECT:	Acrowood	COLLECTION DATE:	8/25/2011 13:00
CLIENT SAMPLE ID	D-2S	WDOE ACCREDITATION:	C601

DATA RESULTS

ANALYTE	METHOD	RESULTS	REPORTING LIMITS	DILUTION FACTOR	UNITS	ANALYSIS DATE	ANALYSIS BY
HCID-Gas Range	NWTPH-HCID	U	20	1	MG/KG	08/26/2011	EBS
HCID-Diesel Range	NWTPH-HCID	U	50	1	MG/KG	08/26/2011	EBS
HCID-Oil Range	NWTPH-HCID	>100	100	1	MG/KG	08/26/2011	EBS

SURROGATE	METHOD	%REC	ANALYSIS DATE	ANALYSIS BY
BCB	NWTPH-HCID	78.0	08/26/2011	EBS
C25	NWTPH-HCID	84.7	08/26/2011	EBS

U - Analyte analyzed for but not detected at level above reporting limit.
Chromatogram indicates that it is likely that sample contains lube oil.

**CERTIFICATE OF ANALYSIS**

CLIENT:	ECI	DATE:	8/29/2011
	1912 - 64th Ave W.	ALS JOB#:	1108119
	Tacoma, WA 98466	ALS SAMPLE#:	-04
CLIENT CONTACT:	Jerry Sawetz	DATE RECEIVED:	8/26/2011
CLIENT PROJECT:	Acrowood	COLLECTION DATE:	8/25/2011 13:20
CLIENT SAMPLE ID	D-2W	WDOE ACCREDITATION:	C601

DATA RESULTS

ANALYTE	METHOD	RESULTS	REPORTING LIMITS	DILUTION FACTOR	UNITS	ANALYSIS DATE	ANALYSIS BY
HCID-Gas Range	NWTPH-HCID	U	130	1	UG/L	08/29/2011	EBS
HCID-Diesel Range	NWTPH-HCID	U	310	1	UG/L	08/29/2011	EBS
HCID-Oil Range	NWTPH-HCID	U	310	1	UG/L	08/29/2011	EBS

SURROGATE	METHOD	%REC	ANALYSIS DATE	ANALYSIS BY
BCB	NWTPH-HCID	75.9	08/29/2011	EBS
C25	NWTPH-HCID	69.8	08/29/2011	EBS
C25 (conc)	NWTPH-HCID	68.8	08/29/2011	EBS

U - Analyte analyzed for but not detected at level above reporting limit.

**CERTIFICATE OF ANALYSIS**

CLIENT:	ECI	DATE:	8/29/2011
	1912 - 64th Ave W.	ALS JOB#:	1108119
	Tacoma, WA 98466	ALS SAMPLE#:	-05
CLIENT CONTACT:	Jerry Sawetz	DATE RECEIVED:	8/26/2011
CLIENT PROJECT:	Acrowood	COLLECTION DATE:	8/25/2011 13:40
CLIENT SAMPLE ID	D-8S	WDOE ACCREDITATION:	C601

DATA RESULTS

ANALYTE	METHOD	RESULTS	REPORTING LIMITS	DILUTION FACTOR	UNITS	ANALYSIS DATE	ANALYSIS BY
HCID-Gas Range	NWTPH-HCID	U	20	1	MG/KG	08/26/2011	EBS
HCID-Diesel Range	NWTPH-HCID	U	50	1	MG/KG	08/26/2011	EBS
HCID-Oil Range	NWTPH-HCID	>100	100	1	MG/KG	08/26/2011	EBS

SURROGATE	METHOD	%REC	ANALYSIS DATE	ANALYSIS BY
BCB	NWTPH-HCID	76.6	08/26/2011	EBS
C25	NWTPH-HCID	85.6	08/26/2011	EBS

U - Analyte analyzed for but not detected at level above reporting limit.
Chromatogram indicates that it is likely that sample contains light oil/lube oil.



CERTIFICATE OF ANALYSIS

CLIENT: ECI DATE: 8/29/2011
1912 - 64th Ave W. ALS JOB#: 1108119
Tacoma, WA 98466 ALS SAMPLE#: -06
CLIENT CONTACT: Jerry Sawetz DATE RECEIVED: 8/26/2011
CLIENT PROJECT: Acrowood COLLECTION DATE: 8/25/2011 14:00
CLIENT SAMPLE ID D-8W WDOE ACCREDITATION: C601

DATA RESULTS

ANALYTE	METHOD	RESULTS	REPORTING LIMITS	DILUTION FACTOR	UNITS	ANALYSIS DATE	ANALYSIS BY
HCID-Gas Range	NWTPH-HCID	U	130	1	UG/L	08/29/2011	EBS
HCID-Diesel Range	NWTPH-HCID	>310	310	1	UG/L	08/29/2011	EBS
HCID-Oil Range	NWTPH-HCID	>310	310	1	UG/L	08/29/2011	EBS

SURROGATE	METHOD	%REC	ANALYSIS DATE	ANALYSIS BY
BCB	NWTPH-HCID	103	08/29/2011	EBS
C25	NWTPH-HCID	68.1	08/29/2011	EBS
C25 (conc)	NWTPH-HCID	65.7	08/29/2011	EBS

U - Analyte analyzed for but not detected at level above reporting limit.
Chromatogram indicates that it is likely that sample contains an unidentified diesel range product and light oil.



CERTIFICATE OF ANALYSIS

CLIENT:	ECI	DATE:	8/29/2011
	1912 - 64th Ave W.	ALS JOB#:	1108119
	Tacoma, WA 98466	ALS SAMPLE#:	-07
CLIENT CONTACT:	Jerry Sawetz	DATE RECEIVED:	8/26/2011
CLIENT PROJECT:	Acrowood	COLLECTION DATE:	8/25/2011 14:30
CLIENT SAMPLE ID	D-1W	WDOE ACCREDITATION:	C601

DATA RESULTS

ANALYTE	METHOD	RESULTS	REPORTING LIMITS	DILUTION FACTOR	UNITS	ANALYSIS DATE	ANALYSIS BY
HCID-Gas Range	NWTPH-HCID	U	130	1	UG/L	08/29/2011	EBS
HCID-Diesel Range	NWTPH-HCID	U	310	1	UG/L	08/29/2011	EBS
HCID-Oil Range	NWTPH-HCID	U	310	1	UG/L	08/29/2011	EBS

SURROGATE	METHOD	%REC	ANALYSIS DATE	ANALYSIS BY
BCB	NWTPH-HCID	69.2	08/29/2011	EBS
C25	NWTPH-HCID	87.5	08/29/2011	EBS
C25 (conc)	NWTPH-HCID	87.5	08/29/2011	EBS

U - Analyte analyzed for but not detected at level above reporting limit.

**CERTIFICATE OF ANALYSIS**

CLIENT: ECI
1912 - 64th Ave W.
Tacoma, WA 98466

DATE: 8/29/2011
ALS SDG#: 1108119
WDOE ACCREDITATION: C601

CLIENT CONTACT: Jerry Sawetz
CLIENT PROJECT: Acrowood

LABORATORY BLANK RESULTS**MB-082611S - Batch 2054 - Soil by NWTPH-HCID**

ANALYTE	METHOD	RESULTS	REPORTING LIMITS	DILUTION FACTOR	UNITS	ANALYSIS DATE	ANALYSIS BY
HCID-Gas Range	NWTPH-HCID	U	20	1	MG/KG	08/26/2011	EBS
HCID-Diesel Range	NWTPH-HCID	U	50	1	MG/KG	08/26/2011	EBS
HCID-Oil Range	NWTPH-HCID	U	100	1	MG/KG	08/26/2011	EBS

MB-081911W - Batch 2034 - Water by NWTPH-HCID

ANALYTE	METHOD	RESULTS	REPORTING LIMITS	DILUTION FACTOR	UNITS	ANALYSIS DATE	ANALYSIS BY
HCID-Gas Range	NWTPH-HCID	U	130	1	UG/L	08/19/2011	EBS
HCID-Diesel Range	NWTPH-HCID	U	310	1	UG/L	08/19/2011	EBS
HCID-Oil Range	NWTPH-HCID	U	310	1	UG/L	08/19/2011	EBS

APPROVED BY

Laboratory Director



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8620 Holly Drive, Suite 100
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<http://www.alsglobal.com>

Chain Of Custody/ Laboratory Analysis Request

ALS Job# (Laboratory Use Only)

1108119

Date 8/25/11 Page 1 Of 1

PROJECT ID: Ackwood REPORT TO COMPANY: ECI PROJECT MANAGER: Jerry ADDRESS: PHONE: FAX: PO. NUMBER: E-MAIL: INVOICE TO COMPANY: ATTENTION: ADDRESS:						ANALYSIS REQUESTED														OTHER (Specify)									
SAMPLE I.D.	DATE	TIME	TYPE	LAB#	NWTPH-HCID	NWTPH-DX	NWTPH-GX	BTEX by EPA-8021	MTBE by EPA-8021	EPA-8260	Halogenated Volatiles by EPA 8260	Volatile Organic Compounds by EPA 8260	EDB / EDC by EPA 8260 SIM (water)	EDB / EDC by EPA 8260 (soil)	Semivolatile Organic Compounds by EPA 8270	Polycyclic Aromatic Hydrocarbons (PAH) by EPA-8270 SIM	PCB	Pesticides by EPA 8081/8082	Metals-MTCA-5	RCRA-8	Pri Pol	TAL	Metals Other (Specify)	TCLP-Metals	VOA	Semi-Vol	Pest	Herbs	NUMBER OF CONTAINERS RECEIVED IN GOOD CONDITION?
1. DC-1	8/25/11	1200	Soil	1	X																								1
2. DC-2		1210	Soil	2	X																								1
3. D-2S		1300	Soil	3	X																								1
4. D-2W		1320	Water	4	X																								3
5. D-8S		1340	Soil	5	X																								1
6. D-8W		1400	Water	6	X																								3
7. D-1W		1430	Water	7	X																								3
8.																													
9.																													
10.																													

SPECIAL INSTRUCTIONS

SIGNATURES (Name, Company, Date, Time):

1. Relinquished By:

Received By:

2. Relinquished By:

Received By:

TURNAROUND REQUESTED in Business Days*
Organic, Metals & Inorganic Analysis
OTHER:

10 5 3 2 1
Standard
Fuels & Hydrocarbon Analysis
5 3 1
Standard

Specify:

* Turnaround request less than standard may incur Rush Charges

LABORATORY COPY