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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
Southwest Region Office
PO Box 47775 • Olympia, WA 98504-7775 • 360-407-6300

September 12, 2022

Ronnie Hastie
Trestlewood Lacey LLC
401 Central St SE
Olympia, WA 98501
ronnie@rjdevelopment.com

Re: No Further Action at a Property associated with the Asarco Tacoma Smelter Site:

- **Site Name:** Trestlewood Lacey
- **Property Address:** 124 Duterrow Road SE, Olympia, Thurston County, WA 98513
- **Facility/Site ID:** 99997161
- **Cleanup Site ID:** 16617
- **VCP Project No.:** SW1776

Dear Ronnie Hastie:

The Washington State Department of Ecology (Ecology) received your request for an opinion on your independent cleanup of a Property associated with the Asarco Tacoma Smelter Site (**Asarco Site**). This letter provides our opinion. We are providing this opinion under the authority of the Model Toxics Control Act (MTCA),[1] chapter 70A.305 Revised Code of Washington (RCW).[2]

Issues Presented and Opinion

Ecology has determined that no further remedial action is necessary at the Property to clean up contamination associated with the Asarco Site. This opinion is dependent on the continued performance and effectiveness of the post-cleanup controls and monitoring specified below.

Ecology has determined that further remedial action is still necessary elsewhere at the Asarco Site.

This opinion is based on an analysis of whether the remedial action meets the substantive requirements of MTCA, chapter 70A.305 RCW, and its implementing regulations, Washington Administrative Code (WAC) chapter 173-340[3] (collectively "substantive requirements of MTCA"). The analysis is provided below.

[1] https://apps.ecology.wa.gov/publications/SummaryPages/9406.html
[2] https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305
[3] https://apps.leg.wa.gov/WAC/default.aspx?cite=173-340

Description of the Property and the Asarco Site

This opinion applies only to the Property and the Asarco Site described below. This opinion does not apply to any other sites that may affect the Property. Any such sites, if known, are identified separately below.

1. Description of the Property.

The Property includes the following tax parcel in Thurston County that was affected by the Asarco Site and addressed by your cleanup:

- 11812410600

Enclosure A includes a legal description of the Property and details of the Property as currently known to Ecology.

2. Description of the Asarco Site.

The Asarco Site is defined by the nature and extent of contamination associated with the following releases:

- Arsenic into the Soil.
- Lead into the Soil.

Those releases have affected more than one parcel of real property, including the parcel identified above.

Enclosure B includes a detailed description and diagram of the Asarco Site, as currently known to Ecology.

3. Identification of Other Sites that may affect the Property.

A parcel of real property can be affected by multiple sites. At this time, we have no information that the Property is affected by other sites.

Basis for the Opinion

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

1. Landau Associates (Landau), *Cleanup Report, Trestlewood Lacey, Washington*, May 27, 2022.
2. Landau, *Cleanup Action Plan Duterrow Residential Development Lacey, Washington*, January 21, 2022.
3. Thurston County, Community Planning and Economic Development, *Mitigated Determination of Nonsignificance*, October 8, 2021.

This opinion is based on information in the documents listed in above. You can request these documents by filing a records request.[4] For help making a request, contact the Public Records Officer at publicrecordsofficer@ecy.wa.gov or call 360-407-6040. Before making a request, check whether the documents are available on Ecology's Cleanup Site Search web page.[5] This opinion is void if any of the information contained in those documents is materially false or misleading.

Analysis of the Cleanup

1. Cleanup of the Property located within the Asarco Site.

Ecology has concluded that **no further remedial action** is necessary at the Property to clean up contamination associated with the Asarco Site. That conclusion is based on the following analysis:

a. Characterization of the Asarco Site.

The Site is described in **Enclosure B**.

Trestlewood Lacey property (Property) is located south of Interstate 5 in Lacey, Washington (Figure 1). The Property is situated on one 9.97-acre Thurston County parcel. The Property is bordered to the south and east by residential properties, to the north by Martin Way East and a Mobil fueling station, and to the northwest by a Thurston County stormwater pond.

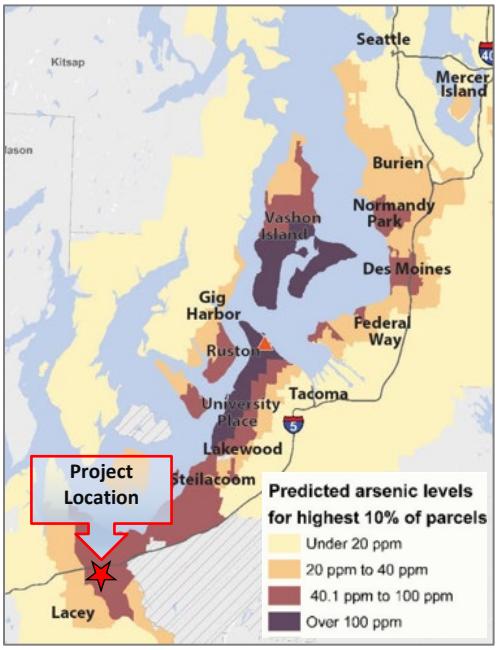


Figure 1. Vicinity Map

Most of the Property is currently undeveloped and covered with mature forest. For more information on the Property, refer to Enclosure A.

RJ Development and its subsidiary, Trestlewood Lacey LLC (RJ) plans to develop this Property into 34 single- and 29 multi-family houses and townhouses, with associated parking, landscaping, and utilities. An area of approximately 30 mature trees was left in place in the center of the Property as a tree preservation area (Figure 2).

As part of the planned development, RJ contracted Landau to characterize the Tacoma Smelter Plume (TSP) contamination on the Property. Landau conducted soil sampling on the Property on February 2, 2021. Landau collected 60 soil samples from 48 locations on the Property (Figure 2).

[4] https://ecology.wa.gov/About-us/Accountability-transparency/Public-records-requests
[5] https://apps.ecology.wa.gov/gsp/Sitepage.anvspx?csid=16617

Figure 2. Approximate Locations of the Characterization Samples

They collected 48 samples from 0 to 6 inches below ground surface (bgs) and 12 samples from 6 to 12 inches bgs. No duff was present on the Property. Landau submitted the samples to Eurofins Seattle laboratory in Tacoma, Washington for arsenic and lead analysis with Environmental Protection Agency (EPA) Method 6010D.

Results of Soil Sampling

Table 1 displays the summary of the characterization sampling on the Property. **Enclosure C** contains the comprehensive results of the characterization sampling on the Property.

Samples collected from 0 to 6 inches bgs: Arsenic exceeded the MTCA Method A cleanup level of 20 milligrams per kilogram (mg/kg) in 16 samples (Figure 3). Three samples exceeded the maximum allowable concentration for a single soil sample or twice the cleanup level for arsenic (40 mg/kg). The arsenic concentrations ranged from 2.1 mg/kg to 48 mg/kg. The average arsenic concentration was 17 mg/kg.

One of the samples exceeded the MTCA Method A cleanup level of 250 mg/kg for lead, but it did not exceed the maximum allowable concentration for a single soil sample of 500 mg/kg for lead. Lead concentrations ranged from 3.0 mg/kg to 330 mg/kg. The average lead concentration was 46 mg/kg.

Samples collected from 6 to 12 inches bgs: One of the samples exceeded the cleanup level of 20 mg/kg for arsenic, but it did not exceed twice the cleanup level. The arsenic concentrations ranged from 1.9 mg/kg to 28 mg/kg. The average arsenic concentration was 11.1 mg/kg.

None of the lead concentrations in this depth interval exceeded the cleanup level of 250 mg/kg. Lead concentrations ranged from 1.8 mg/kg to 48 mg/kg. The average lead concentration was 19.7 mg/kg.

Table 1. Summary of Soil Characterization on the Property

Depth (inches)	Arsenic (mg/kg)			Lead (mg/kg)		
	Minimum	Maximum	Average	Minimum	Maximum	Average
0-6	2.1	**48**	17	3	**330**	46
6-12	1.9	**28**	11.1	1.8	48	19.7
MTCA Cleanup Level		40	20		500	250

Bold values represent concentrations above the MTCA Method A cleanup level.
Bold red values represent concentrations twice the MTCA Method A cleanup level.

b. Establishment of Cleanup Standards for the Asarco Site.

Ecology has determined the cleanup levels and points of compliance established for the Asarco Site meet the substantive requirements of MTCA.

As part of the Interim Action Plan for the Asarco Site (June 2012) (IAP), Ecology completed a terrestrial ecological evaluation for properties with only Tacoma Smelter Plume contamination. Ecology determined the MTCA Method A cleanup levels for both arsenic and lead were protective of both human health and the environment. The MTCA Method A cleanup levels for soil are as follows:

- Arsenic is 20 mg/kg.
- Lead is 250 mg/kg.

The IAP determined the following cleanup levels were protective of human health and the environment for properties within the Asarco Site:

- Average arsenic concentration detected in the soil less than 20 mg/kg.
- Average lead concentration detected in the soil less than 250 mg/kg.
- Duff composite sample is less than 20 mg/kg for arsenic
- Duff composite sample is less than 250 mg/kg for lead

AND

- No single soil sample has arsenic concentration above 40 mg/kg.
- No single soil sample has lead concentration above 500 mg/kg.

c. Selection of Cleanup for the Property.

Ecology has determined the cleanup selected for the Property meets the substantive requirements of MTCA and the IAP. The cleanup meets the minimum cleanup requirements and does not exacerbate conditions or preclude reasonable cleanup alternatives elsewhere at the Asarco Site.

Ecology proposed four model remedies in the IAP:

- Excavation and removal.
- Mixing.
- Capping in place.
- Consolidation and capping.

RJ decided to use mixing as a way to remediate the TSP contamination on the Property. On January 21, 2022, on behalf of RJ, Landau developed a Cleanup Action Plan (CAP) for the Property. The CAP described the use of the selected model remedy: mixing. RJ did not request an opinion on the proposed cleanup from Ecology.

d. Cleanup of the Property.

RJ conducted the soil cleanup in conjunction with Property development.

The contractor removed all the trees, other vegetation, and tree stumps from the entire Property except for the tree preservation area in the center of the Property. Prior to the disposal of the vegetation, the contractor inspected all the root balls to ensure the removal of all the contaminated soil. They hauled the vegetation to a regular yard waste recycling facility.

After removal of the vegetation, the contractor excavated the upper 12 inches of soil from the entire Property and placed it in nine stockpiles (Stockpiles A through I). The contractor used hand tools to remove the soil from the tree preservation area in the center of the Property.

The soil from the tree preservation area was added to the stockpiles. All the stockpiles were thoroughly mixed. After the mixing, Landau sampled the stockpiles adhering to the 2019 TSP Model Remedies Guidance. Landau collected six-point composite samples from the stockpiles on April 6 and 8, 2022.

Arsenic exceeded the cleanup level of 20 mg/kg in stockpiles B, C, F, and G. The contractor conducted additional round of mixing with deeper, cleaner soil. Landau collected additional samples from the remixed stockpiles on April 12 and 14, 2022. Figure 3 shows the approximate locations of the stockpiles and the composite samples. The size of each final stockpile and the number of composite samples collected are summarized below:

- Stockpile A – 1,200 cubic yards, 4 final composite samples.
- Stockpile B – 300 cubic yards, 2 final composite samples.
- Stockpile C – 350 cubic yards, 4 final composite samples.
- Stockpile D – 200 cubic yards, 2 final composite samples.
- Stockpile E – 500 cubic yards, 4 final composite samples.
- Stockpile F – 750 cubic yards, 4 final composite samples.

- Stockpile G – 2,000 cubic yards, 6 final composite samples.
- Stockpile H – 1,500 cubic yards, 6 final composite samples.
- Stockpile I – 750 cubic yards, 4 final composite samples.

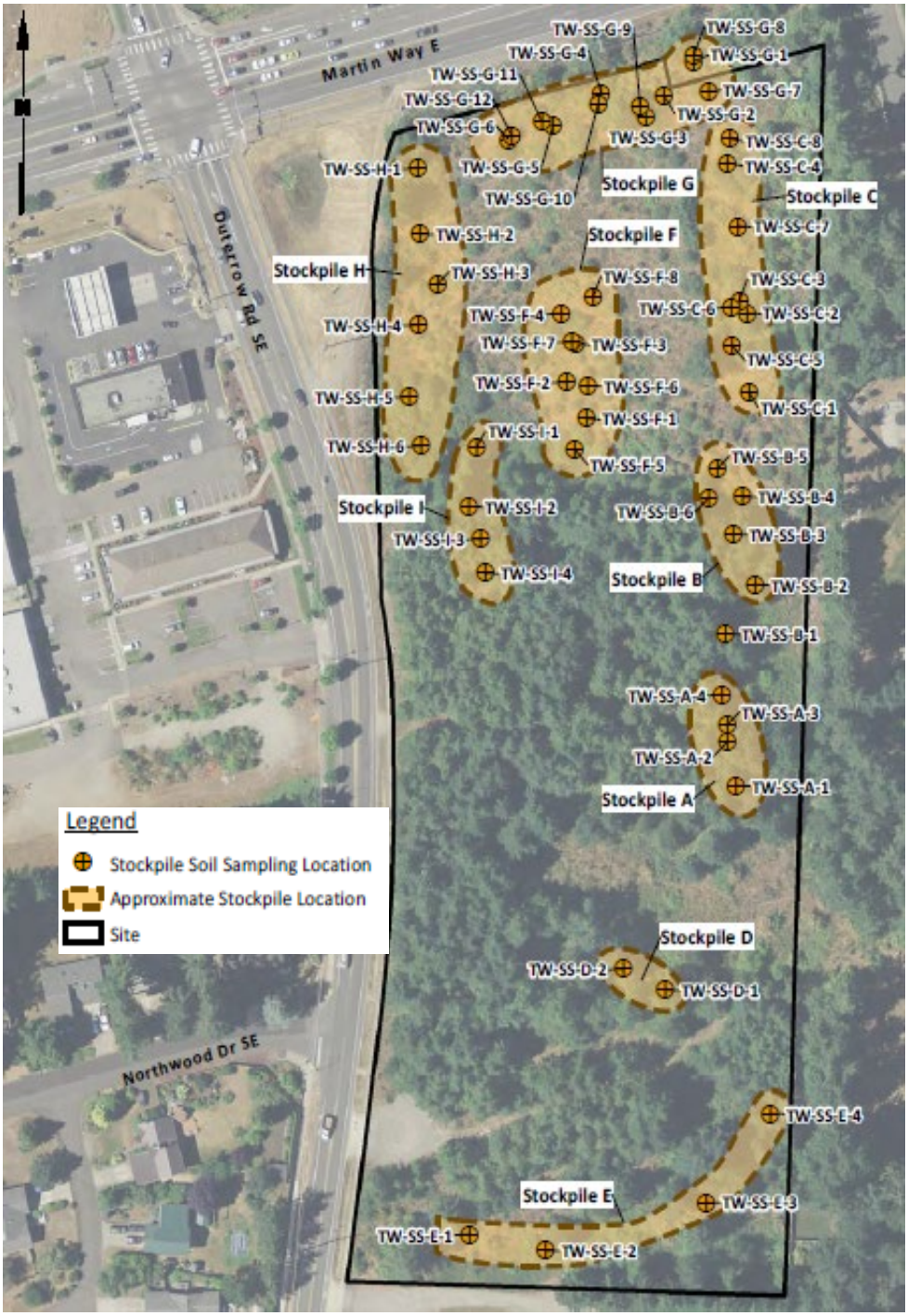


Figure 3. Approximate Locations of Stockpiles and Composite Samples

Following the excavation and stockpiling of soil, Landau collected 48 confirmational samples from 0 to 6 inches bgs at the bottom of the excavated areas (Figure 4).

Landau submitted the samples to Eurofins Seattle laboratory in Tacoma, Washington for arsenic and lead analysis with EPA Method 6010D.

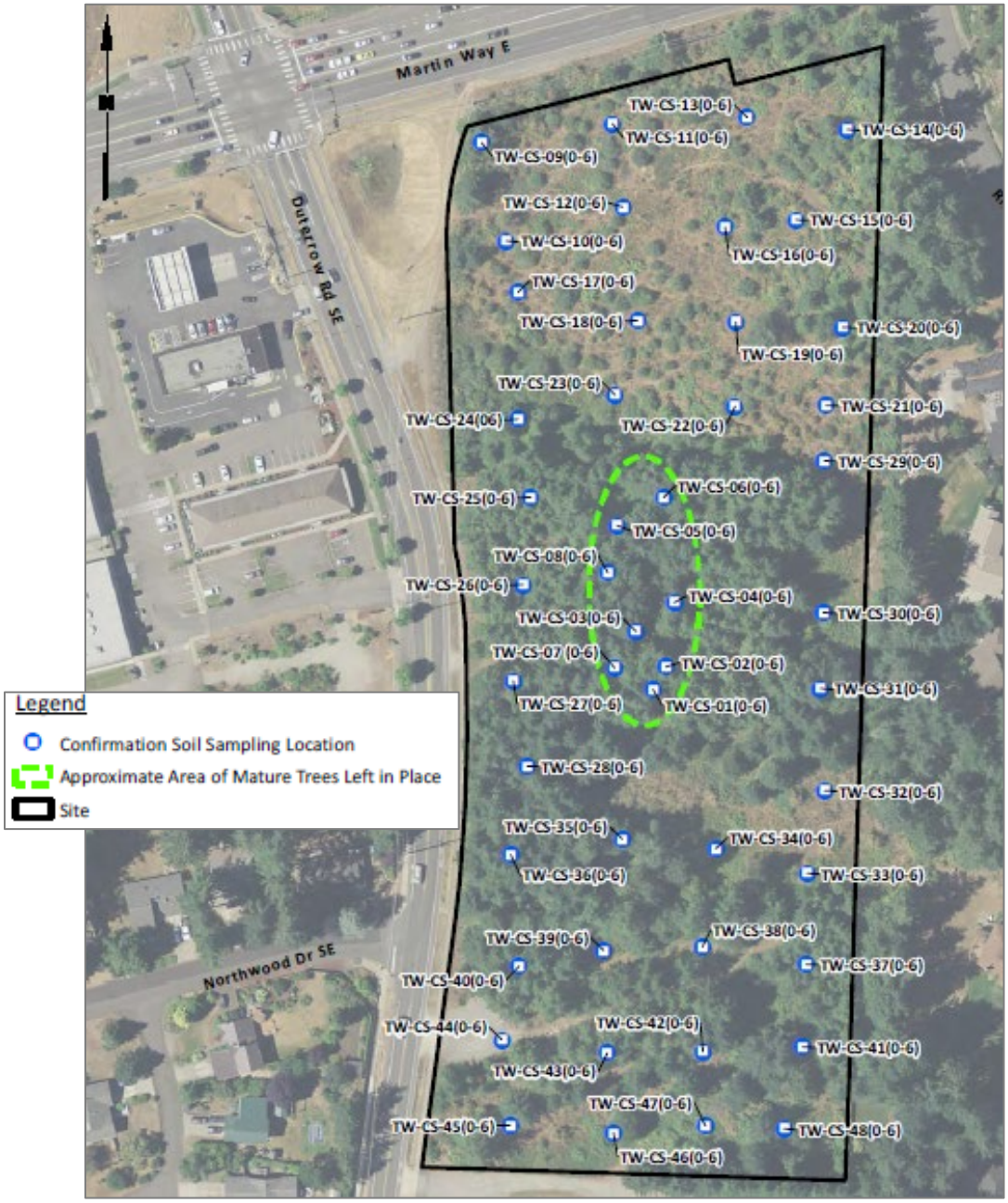


Figure 4. Approximate Locations of Confirmational Samples

Results of Stockpile and Confirmational Sampling:

All the stockpile and confirmational samples were below the cleanup level of 20 mg/kg for arsenic and 250 mg/kg for lead. The summary of the confirmational sampling is included in Table 2. Enclosure C includes the comprehensive results of the stockpile and confirmational sampling on the Property.

The results of the confirmational soil sampling showed that no further cleanup actions were needed for the Property.

Table 2. Results of the Confirmational Sampling

Sample Type	Arsenic (mg/kg)			Lead (mg/kg)		
	Min	Max	Average	Min	Max	Average
Confirmational	2.9	14	4.9	2.8	29	6.8
MTCA		40	20			250

2. Cleanup of the Asarco Site as a Whole.

Ecology has concluded that **further remedial action** under MTCA is still necessary elsewhere at the **Asarco Site**. In other words, while your cleanup constitutes the final action for the Property, it is only an **"interim action"** for the Asarco Site as a whole.

Listing of the Asarco Site

Based on this opinion, Ecology will update the status of remedial action at the Asarco Site on our database of hazardous waste sites. However, because further remedial action is still necessary elsewhere at the Asarco Site, we will not remove the Asarco Site from our lists of hazardous waste sites. Furthermore, the Property will remain listed as part of the Asarco Site because the cleanup of the Property does not change the boundaries of the Asarco Site.

Limitations of the Opinion

1. **Opinion does not Settle Liability with the State.**

   Liable persons are strictly liable, jointly and severally, for all remedial action costs and for all natural resource damages resulting from the release or releases of hazardous substances at the Property. This opinion **does not**:

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

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

2. **Opinion does not Constitute a Determination of Substantial Equivalence.**

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

3. **State is Immune from Liability.**

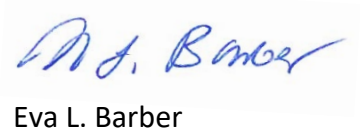
   The state, Ecology, and its officers and employees are immune from all liability, and no cause of action of any nature may arise from any act or omission in providing this opinion.
   See RCW 70A.305.170(6).

Termination of Agreement

Thank you for cleaning up your Property under the Voluntary Cleanup Program (VCP). This opinion terminates the VCP Agreement governing this project (#SW1776).

For more information about the VCP and the cleanup process, please visit our Voluntary Cleanup Program webpage.[6] If you have any questions about this opinion, please contact me at 360-999-9593 or eva.barber@ecy.wa.gov.

Sincerely,



Eva L. Barber
Technical Assistance Coordinator
Toxics Cleanup Program
Southwest Region Office

Enclosures: A – Legal Property Description and General Property Description
B – Site Description of Asarco Tacoma Smelter Site
C – Results of Soil Characterization and Confirmational Sampling

cc by email: Sharon Lumbantobing, Thurston County, sharon.lumbantobing@co.thurston.wa.us
Sierra Mott, Landau, smott@landauinc.com
Marian Abbett, Ecology, marian.abbett@ecy.wa.gov
Tim Mullin, Ecology, tim.mullin@ecy.wa.gov
Ecology Site File

[6] https://www.ecy.wa.gov/vcp

Enclosure A

Legal and General Description of the Property

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Legal Property Description

Legal Description:

Parcel 11842410600: Section 12 Township 18 Range 1W Quarter NE SE BLA21100469TC TR A Document 4871346

General Property Description

Trestlewood Lacey property (Property) is located south of Interstate 5 in Lacey, Washington. The Property is situated on one 9.88-acre Thurston County parcel. The Property is bordered to the south and east by residential properties, to the north by Martin Way East and Mobil fueling station, and to the nortwest by a Thurston County stormwater pond.

The Property is located in an upland area with relatively flat topography. Prior to cleanup action, the Property was forested.

The geologic setting near the Property follows the typical pattern of glacially deposited soil found in south Puget Sound. The surficial geology within the Property consists of soil described by the Washington State Department of Natural Resources as Pleistocene-age Vashon recessional outwash (Logan et al. 2003; accessed January 1, 2022). This unit typically consists of rounded, poorly to moderately sorted sands and gravels with localized silt and clay deposits.

The current Property elevation is approximately 250 feet above mean sea level, and the topography is generally flat. Groundwater was not encountered during the soil sampling. The shallow groundwater is anticipated to be approximately 140 feet below grade and flowing towards the east.

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Enclosure B

Site Description of Asarco Tacoma Smelter Site

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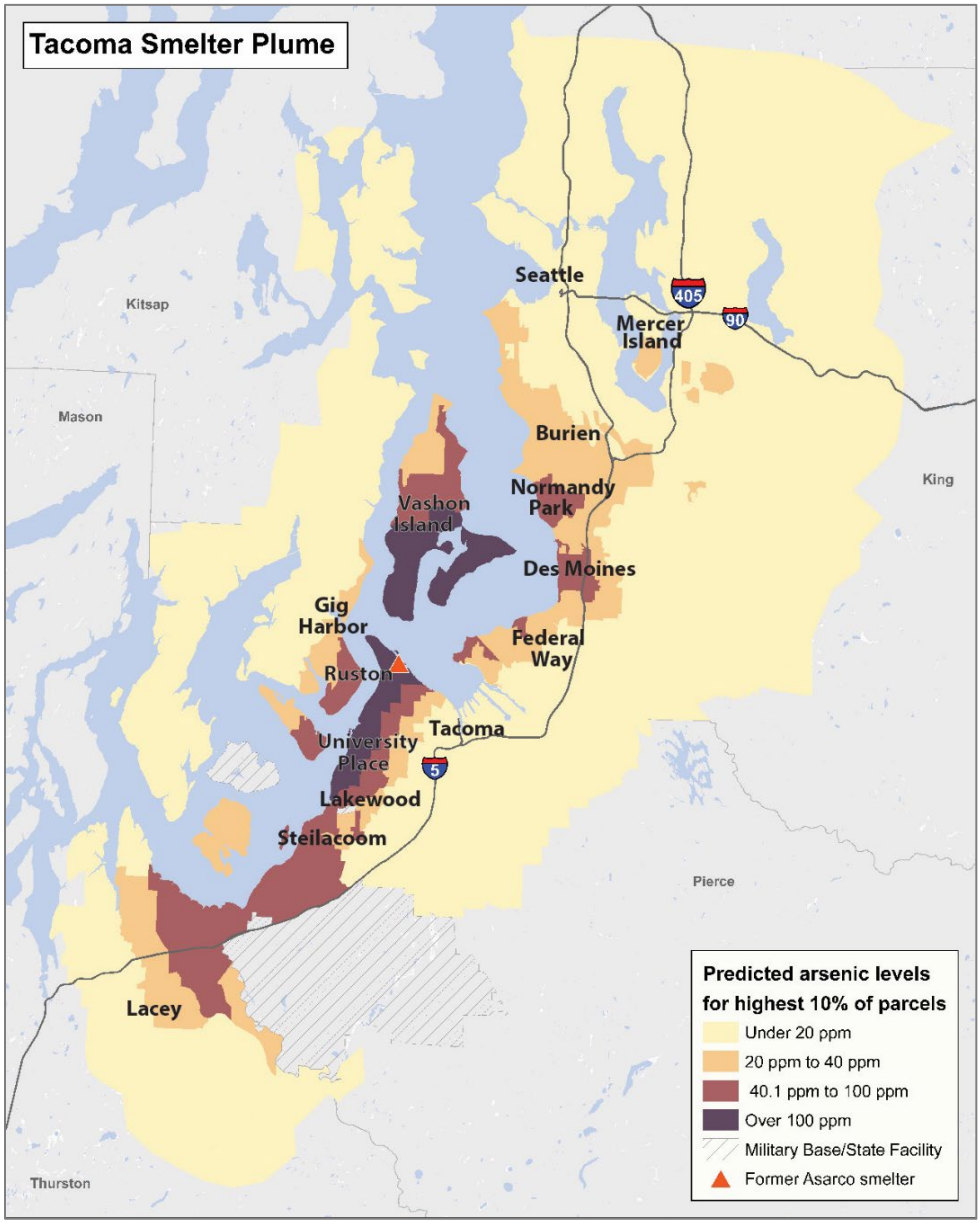
Asarco Tacoma Smelter Site



An interactive color map can be found at: https://dirtalert.info/. For almost 100 years, the Asarco Company operated a copper smelter in Tacoma. Air pollution from the smelter settled on the surface soil over a vast region—more than 1,000 square miles of the Puget Sound basin. Elevated levels of contamination are found as far south as the Nisqually Ridge and as far north as Seattle (West Seattle). Additionally, elevated levels of contamination are found as far west as the Kitsap Peninsula and as far east as Kent and Bellevue. Arsenic, lead, cadmium, and other heavy metals are still in the soil as a result of this pollution. The area has elevated levels of arsenic, lead, and cadmium in the soil due to air emissions from the Asarco smelter.

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Enclosure C

Results of Soil Characterization

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Results of Soil Characterization

Sample ID	**Sample Depth** (inches)	**Sample Date**	**Arsenic** (mg/kg)	**Lead** (mg/kg)
DT-CZ-31 (0-6)	0-6	2/2/2021	2.1	3.0
DT-CZ-05 (0-6)	0-6	2/1/2021	2.7	5.0
DT-CZ-06 (0-6)	0-6	2/2/2021	2.9	7.4
DT-CZ-11 (0-6)	0-6	2/2/2021	3.0	6.0
DT-CZ-23 (0-6)	0-6	2/2/2021	3.5	4.6
DT-CZ-30 (0-6)	0-6	2/2/2021	4.1	7.0
DT-CZ-19 (0-6)	0-6	2/2/2021	4.6	8.1
DT-CZ-18 (0-6)	0-6	2/2/2021	4.8	9.7
DT-CZ-09 (0-6)	0-6	2/2/2021	7.1	12
DT-CZ-10 (0-6)	0-6	2/2/2021	8.7	16
DT-CZ-21 (0-6)	0-6	2/2/2021	9.4	17
DT-CZ-46 (0-6)	0-6	2/2/2021	9.9	19
DT-CZ-48 (0-6)	0-6	2/2/2021	11	26
DT-CZ-47 (0-6)	0-6	2/2/2021	12	25
DT-CZ-08 (0-6)	0-6	2/2/2021	12	26
DT-CZ-07 (0-6)	0-6	2/2/2021	12	32
DT-CZ-36 (0-6)	0-6	2/2/2021	12	64
DT-CZ-43 (0-6)	0-6	2/2/2021	13	19
DT-CZ-34 (0-6)	0-6	2/2/2021	13	48
DT-CZ-01 (0-6)	0-6	2/1/2021	14	26
DT-CZ-29 (0-6)	0-6	2/1/2021	14	28
DT-CZ-12 (0-6)	0-6	2/2/2021	14	29
DT-CZ-42 (0-6)	0-6	2/2/2021	14	31
DT-CZ-32 (0-6)	0-6	2/2/2021	14	32
DT-CZ-20 (0-6)	0-6	2/2/2021	16	37
DT-CZ-33 (0-6)	0-6	2/2/2021	17	34
DT-CZ-24 (0-6)	0-6	2/2/2021	18	34
DT-CZ-22 (0-6)	0-6	2/2/2021	18	36
DT-CZ-41 (0-6)	0-6	2/1/2021	19	49
DT-CZ-25 (0-6)	0-6	2/1/2021	19	62
DT-CZ-35 (0-6)	0-6	2/2/2021	19	95
DT-CZ-45 (0-6)	0-6	2/2/2021	20	33
DT-CZ-14 (0-6)	0-6	2/1/2021	**21**	42

Sample ID	Sample Depth (inches)	Sample Date	Arsenic (mg/kg)	Lead (mg/kg)
DT-CZ-17 (0-6)	0-6	2/1/2021	**21**	42
DT-CZ-39 (0-6)	0-6	2/1/2021	**21**	42
DT-CZ-27 (0-6)	0-6	2/1/2021	**21**	58
DT-CZ-02 (0-6)	0-6	2/1/2021	**22**	56
DT-CZ-04 (0-6)	0-6	2/1/2021	**22**	71
DT-CZ-44 (0-6)	0-6	2/2/2021	**23**	63
DT-CZ-38 (0-6)	0-6	2/1/2021	**25**	50
DT-CZ-40 (0-6)	0-6	2/1/2021	**26**	48
DT-CZ-28 (0-6)	0-6	2/1/2021	**28**	48
DT-CZ-13 (0-6)	0-6	2/1/2021	**29**	120
DT-CZ-16 (0-6)	0-6	2/1/2021	**39**	29
DT-CZ-15 (0-6)	0-6	2/1/2021	**40**	83
DT-CZ-26 (0-6)	0-6	2/1/2021	**43**	100
DT-CZ-37 (0-6)	0-6	2/1/2021	**47**	**330**
DT-CZ-03 (0-6)	0-6	2/1/2021	**48**	160
DT-CZ-31 (6-12)	6-12	2/2/2021	1.9	1.8
DT-CZ-12 (6-12)	6-12	2/2/2021	5.9	10
DT-CZ-18 (6-12)	6-12	2/2/2021	5.9	10
DT-CZ-27 (6-12)	6-12	2/1/2021	7.5	15
DT-CZ-14 (6-12)	6-12	2/1/2021	7.7	11
DT-CZ-35 (6-12)	6-12	2/2/2021	7.8	22
DT-CZ-04 (6-12)	6-12	2/1/2021	12	14
DT-CZ-45 (6-12)	6-12	2/2/2021	13	15
DT-CZ-37 (6-12)	6-12	2/1/2021	13	25
DT-CZ-41 (6-12)	6-12	2/2/2021	14	31
DT-CZ-08 (6-12)	6-12	2/2/2021	16	34
DT-CZ-22 (6-12)	6-12	2/2/2021	**28**	48

Values in **bold** represent concentrations above the MTCA Method A cleanup level.
Values in **bold red** represent concentrations twice the cleanup level.

Results of Stockpile Sampling

Field Sample ID	Stockpile	Sample Date	Arsenic (mg/kg)	Lead (mg/kg)
TW-SS-A-3	A	4/6/2022	8.3	17
TW-SS-A-4	A	4/6/2022	9.7	21
TW-SS-A-2	A	4/6/2022	10	24
TW-SS-A-1	A	4/6/2022	13	25
TW-SS-B-2	B	4/6/2022	8.7	14
TW-SS-B-6	B	4/12/2022	9.0	13
TW-SS-B-5	B	4/12/2022	11	18
TW-SS-B-4	B	4/6/2022	15	36
TW-SS-B-1	B	4/6/2022	21	31
TW-SS-B-3	B	4/6/2022	**30**	59
TW-SS-C-5	C	4/12/2022	8.9	12
TW-SS-C-6	C	4/12/2022	10	18
TW-SS-C-7	C	4/12/2022	16	31
TW-SS-C-8	C	4/12/2022	21	49
TW-SS-C-3	C	4/6/2022	**21**	58
TW-SS-C-2	C	4/6/2022	**22**	57
TW-SS-C-4	C	4/6/2022	**24**	100
TW-SS-C-1	C	4/6/2022	**31**	78
TW-SS-D-1	D	4/8/2022	7.0	15
TW-SS-D-2	D	4/8/2022	11	22
TW-SS-E-4	E	4/6/2022	5.8	11
TW-SS-E-1	E	4/6/2022	9.4	17
TW-SS-E-2	E	4/6/2022	12	22
TW-SS-E-3	E	4/6/2022	14	26
TW-SS-F-8	F	4/14/2022	4.9	7.1
TW-SS-F-6	F	4/14/2022	5.3	9.3
TW-SS-F-5	F	4/14/2022	5.4	8.4
TW-SS-F-7	F	4/14/2022	5.7	9.0
TW-SS-F-1	F	4/8/2022	8.8	14
TW-SS-F-2	F	4/8/2022	16	27
TW-SS-F-3	F	4/8/2022	17	30
TW-SS-F-4	F	4/8/2022	**24**	60
TW-SS-G-8	G	4/14/2022	5.9	11
TW-SS-G-10	G	4/14/2022	6.9	12

Field Sample ID	Stockpile	Sample Date	Arsenic (mg/kg)	Lead (mg/kg)
TW-SS-G-11	G	4/14/2022	6.9	12
TW-SS-G-12	G	4/14/2022	7.6	21
TW-SS-G-7	G	4/14/2022	9.1	19
TW-SS-G-9	G	4/14/2022	10	17
TW-SS-G-4	G	4/8/2022	16	150
TW-SS-G-3	G	4/8/2022	20	61
TW-SS-G-5	G	4/8/2022	20	85
TW-SS-G-6	G	4/8/2022	**21**	82
TW-SS-G-2	G	4/8/2022	**25**	91
TW-SS-G-1	G	4/8/2022	**26**	130
TW-SS-H-2	H	4/8/2022	15	34
TW-SS-H-6	H	4/8/2022	18	44
TW-SS-H-5	H	4/8/2022	19	38
TW-SS-H-3	H	4/8/2022	20	35
TW-SS-H-1	H	4/8/2022	20	74
TW-SS-H-4	H	4/8/2022	22	54
TW-SS-I-3	I	4/8/2022	6.9	15
TW-SS-I-4	I	4/8/2022	8.3	18
TW-SS-I-2	I	4/8/2022	9.1	17
TW-SS-I-1	I	4/8/2022	18	34

Values in **bold** represent concentrations above the MTCA Method A cleanup level

Results of Confirmational Sampling

Sample ID	Sample Depth (inches)	Sample Date	Arsenic (mg/kg)	Lead (mg/kg)
TW-CS-20(0-6)	0-6	5/12/2022	3.3	2.8
TW-CS-24(0-6)	0-6	5/12/2022	3.0	3.2
TW-CS-37(0-6)	0-6	5/12/2022	3.1	3.2
TW-CS-13(0-6)	0-6	5/12/2022	3.3	3.2
TW-CS-11(0-6)	0-6	5/12/2022	3.2	3.4
TW-CS-35(0-6)	0-6	5/12/2022	2.9	3.5
TW-CS-25(0-6)	0-6	5/12/2022	3.4	3.5
TW-CS-17(0-6)	0-6	5/12/2022	3.6	3.5
TW-CS-14(0-6)	0-6	5/12/2022	3.9	3.6
TW-CS-18(0-6)	0-6	5/12/2022	3.9	3.7
TW-CS-19(0-6)	0-6	5/12/2022	3.8	3.8
TW-CS-28(0-6)	0-6	5/12/2022	3.4	3.9
TW-CS-15(0-6)	0-6	5/12/2022	3.5	3.9
TW-CS-26(0-6)	0-6	5/12/2022	3.9	3.9
TW-CS-40(0-6)	0-6	5/12/2022	3.4	4.3
TW-CS-21(0-6)	0-6	5/12/2022	3.7	4.3
TW-CS-47(0-6)	0-6	5/12/2022	3.7	4.4
TW-CS-29(0-6)	0-6	5/12/2022	3.8	4.4
TW-CS-12(0-6)	0-6	5/12/2022	9.3	4.5
TW-CS-36(0-6)	0-6	5/12/2022	4.8	4.6
TW-CS-32(0-6)	0-6	5/12/2022	3.8	4.7
TW-CS-16(0-6)	0-6	5/12/2022	5.3	4.9
TW-CS-38(0-6)	0-6	5/12/2022	3.7	5.0
TW-CS-22(0-6)	0-6	5/12/2022	5.4	5.0
TW-CS-06 (0-6)	0-6	4/25/2022	3.8	5.1
TW-CS-48(0-6)	0-6	5/12/2022	4.1	5.1
TW-CS-27(0-6)	0-6	5/12/2022	3.5	5.3
TW-CS-31(0-6)	0-6	5/12/2022	4.2	5.3
TW-CS-41(0-6)	0-6	5/12/2022	4.3	5.5
TW-CS-09(0-6)	0-6	5/12/2022	4.4	5.6
TW-CS-02 (0-6)	0-6	4/25/2022	5.7	5.7
TW-CS-39(0-6)	0-6	5/12/2022	3.5	5.8
TW-CS-33(0-6)	0-6	5/12/2022	5.0	6.1
TW-CS-42(0-6)	0-6	5/12/2022	4.5	6.4

Sample ID	**Sample Depth** (inches)	**Sample Date**	**Arsenic** (mg/kg)	**Lead** (mg/kg)
TW-CS-10(0-6)	0-6	5/12/2022	5.7	6.6
TW-CS-23(0-6)	0-6	5/12/2022	4.5	6.7
TW-CS-44(0-6)	0-6	5/12/2022	4.4	6.8
TW-CS-46(0-6)	0-6	5/12/2022	4.9	7.0
TW-CS-45(0-6)	0-6	5/12/2022	3.8	7.4
TW-CS-03 (0-6)	0-6	4/25/2022	5.9	8.0
TW-CS-30(0-6)	0-6	5/12/2022	4.5	8.1
TW-CS-01 (0-6)	0-6	4/25/2022	6.9	10
TW-CS-34(0-6)	0-6	5/12/2022	5.5	12
TW-CS-43(0-6)	0-6	5/12/2022	6.0	12
TW-CS-04 (0-6)	0-6	4/25/2022	7.4	17
TW-CS-07 (0-6)	0-6	4/25/2022	11	19
TW-CS-08 (0-6)	0-6	4/25/2022	12	25
TW-CS-05 (0-6)	0-6	4/25/2022	14	29