November 14, 2022

Washington State Department of Ecology
Northwest Regional Office
Toxics Cleanup Program
P.O. Box 330316,
Shoreline, Washington 98133-9716

Attention: Ms. Kim Vik, Site Manager

Re: BLT Trucking: Arsenic in Groundwater at and near the BLT Trucking Site
Facility/Site ID: 60800, Cleanup Site ID: 16551, VCP Site #: NW3338

Ms. Vik:

At a June 24, 2022 meeting with yourself and Michael Warfel, you requested that we provide you with additional information regarding the elevated concentrations of arsenic found in the groundwater on the BLT Trucking Property located at 8010 South 259th street in Kent, Washington (Figure 1, attached). You indicated two possible options for addressing the arsenic. The first was to assess if there was enough empirical data to support a statistical analysis then perform a statistical analysis to show that the concentrations found were not statistically significant. The second option was to show that the arsenic was not from the Property and was within the background levels.

ECI has reviewed the Ecology statistical requirements for showing that the analytical results were not statistically significant and reviewed the statistical programs used by both Ecology and EPA. It was ECI's opinion that this was not the easiest option and would likely require more data.

In researching the site, ECI observed that the entire region was once agricultural from at least the 1930s to the mid-1960s and contained several cherry orchards (Figures 2 through 4, attached). During that timeframe, it was common to use lead-arsenic pesticides. Lead-arsenic pesticide residues have been found in both the soil and groundwater of many agricultural areas around the State of Washington and are likely what has been identified at the BLT site. Based on the historical use of the region, it is ECI's opinion that the second option of showing that arsenic was from off-site or within the range of background concentrations seemed to be a more promising option.

ECI DATA REVIEW

ECI has reviewed the Ecology online databases, "What's in My Neighborhood" and the "Facility/Site" database for sites within a 2-mile radius of the BLT Trucking Property that have been sampled for arsenic in groundwater. We were looking for sites that had documented arsenic in the groundwater which was not attributed to that particular site.

There were 117 total sites within that 2-mile radius. ECI looked to see if any of the site documents on the Ecology websites mentioned arsenic as being in the groundwater. The majority of the sites within the 2-mile radius were petroleum sites and did not have information regarding arsenic. However, eleven (11) sites including the BLT site were identified as mentioning arsenic in the soil/groundwater above the 20 milligrams per kilogram (mg/kg) soil and 5 microgram per liter (µg/L) Model Toxic Control Act (MTCA) Method A cleanup Levels.

One of the sites was the Joseph Simon site which is adjacent to the BLT Property to the north. However, the documents contained on the Ecology website for the Joseph Simon site and a number of the other sites were limited or did not contain analytical data showing the arsenic concentrations. Some of the documents referred to other documents that are in the Ecology files but not on the website. Therefore, ECI submitted a request to Ecology for copies of the files for each of the 10 identified sites.

Files for two of the sites were no longer at Ecology and were available through the State Archives. Those sites were the Joseph Simon & Sons site and the Atomic Auto Wrecking/ Boyd Investments Site. Both of those sites are adjacent to the BLT Trucking site. ECI contacted the State Archives and reviewed the files that were located there.

ECI has reviewed and tabulated the data found in the online reports and the reports found in the Ecology and Archive files. We compared them to the levels found at the BLT Trucking site. The levels at the BLT site are within the range of values that have been observed at other sites in the region (Table 1, attached).

The total arsenic in the groundwater at the BLT Trucking site range from being below the laboratory practical quantitation limit (PQL) to a high of 19 µg/L with an average concentration of 7.2 µg/L. Total arsenic in the region was found at concentrations ranging from below the laboratory PQL to a high of 159 µg/L with an average concentration of 48.6 µg/L where it was detected. The concentrations at the BLT trucking site are within the range of concentrations found regionally and below the average concentration for the sites reporting total arsenic in the groundwater.

Dissolved Arsenic in the groundwater at the BLT site where measured ranged from below the laboratory PQL to 23 µg/L with an average concentration of 7.2 µg/L[1]. Dissolved arsenic in the region where measured ranged from below the laboratory PQL to a high of 90.8 µg/L with an average concentration of 27.7 µg/L. The concentrations at the BLT trucking site are within the range of concentrations found regionally and below the average concentration for the sites reporting dissolved arsenic in the groundwater.

Several of the sites in the region that have reported arsenic above the Cleanup Levels have received No Further Action (NFA) determinations while others have either awaiting cleanup or have cleanups started

[1] It should be noted that the highest concentration of dissolved arsenic is greater than the highest concentration of total arsenic. According to the laboratory the concentration differences are not statistically significant and may be a result of the time between when the total sample was collected and the time the sample was filtered for dissolved analysis.

but have dismissed the arsenic as being regional or from and off-site source. At the Joseph Simon and Sons Site immediately adjacent to the BLT Trucking site to the north and upgradient, arsenic was found in 27 of 28 reconnaissance groundwater samples ranging in concentration from 7.03 to 277 µg/L (See attached table from the Joesph and Simon Remedial Investigation).

Eight groundwater-monitoring wells were installed at the Joesph Simon site and sampled in December 2005, March 2006, May 2006, and August 2006. According to a March 2007 groundwater monitoring report prepared by Kennedy Jenks Consultants,

> *"Arsenic has been detected at concentrations above the MTCA Method A groundwater cleanup level in five site monitoring wells (MW-1, MW-2, MW-5, MW-7, and MW-8). Arsenic was detected consistently during multiple monitoring events only at well MW-7, which, as previously discussed, is located in close proximity to a City of Kent storm drain line. In wells MW-1, MW-2, MW-5, and MW-8, arsenic concentrations above the MTCA cleanup level were detected intermittently."*

The arsenic levels found in the monitoring wells ranged from below the laboratory PQL to 12.4 µg/L. This is in the same range as was found at the BLT Trucking site. Kennedy Jenks went on to say:

> *"Since there were no significant onsite sources of arsenic at the site, low concentrations of arsenic **detected** intermittently in some monitoring wells indicate that the source is likely attributed to natural background concentrations."*

At Ecology's request, Kennedy Jenks also researched background levels of arsenic in South King County and the vicinity of the site. The results of their research presented in a June 2007 "*Shallow Groundwater Investigation*" report indicated that maps prepared by King County depicting arsenic concentrations in groundwater illustrated that arsenic concentrations above 5 µg/L were detected at multiple locations in the South King County area. Kennedy Jenks then said:

> *"Although specific groundwater sample locations do not appear to be in the immediate vicinity of the Joseph Simon and Sons site, the King County reports illustrate that arsenic concentrations above the MTCA Method A cleanup level of 5 µg/L are a common occurrence in the South King County area. The arsenic concentrations detected in groundwater samples collected at the Joseph Simon and Sons site appear to be consistent with those presented in the King County reports and appear to be indicative of regional background concentrations."*

Based on the reports submitted and email discussions, Ecology accepted that with the arsenic found on the Joseph Simon Site was likely not from activities at that site and may represent background levels.

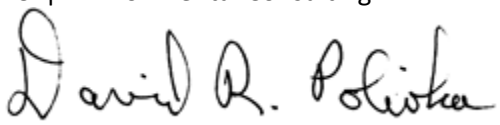
CONCLUSIONS

Based on the information presented by Kennedy Jenks for the Joseph Simon Site, which is immediately adjacent and upgradient to the BLT Trucking Site, the information ECI found from other sites within the 2-mile radius of the BLT Trucking Site, and that historically the site and region were in agricultural use from

at least the 1930s to the mid-1960s, it is ECI's opinion that the arsenic that was found in the groundwater at the BLT site is not from the BLT site and is within the range of concentrations that are found regionally.

If you have any questions, please contact me via email at david@alleci.com or Stephen Spencer at (253) 921-7059 or Stephen@alleci.com.

Sincerely,
ECI | Environmental Consulting



David R. Polivka, L.G./ L. Hg.
Senior Hydrogeologist

Attachments:

List of Figures
Figure 1 – Site Location Map
Figure 2 – Aerial Photograph 1936
Figure 3 – Aerial Photograph 1957
Figure 4 – Aerial Photograph 1965

List of Tables
Table 1 - Summary of Arsenic in Groundwater Near BLT Trucking
Table 2- Joseph Simon RI/FS "Summary of Reconnaissance Groundwater Analytical Results"

Cc: Client

Attachments

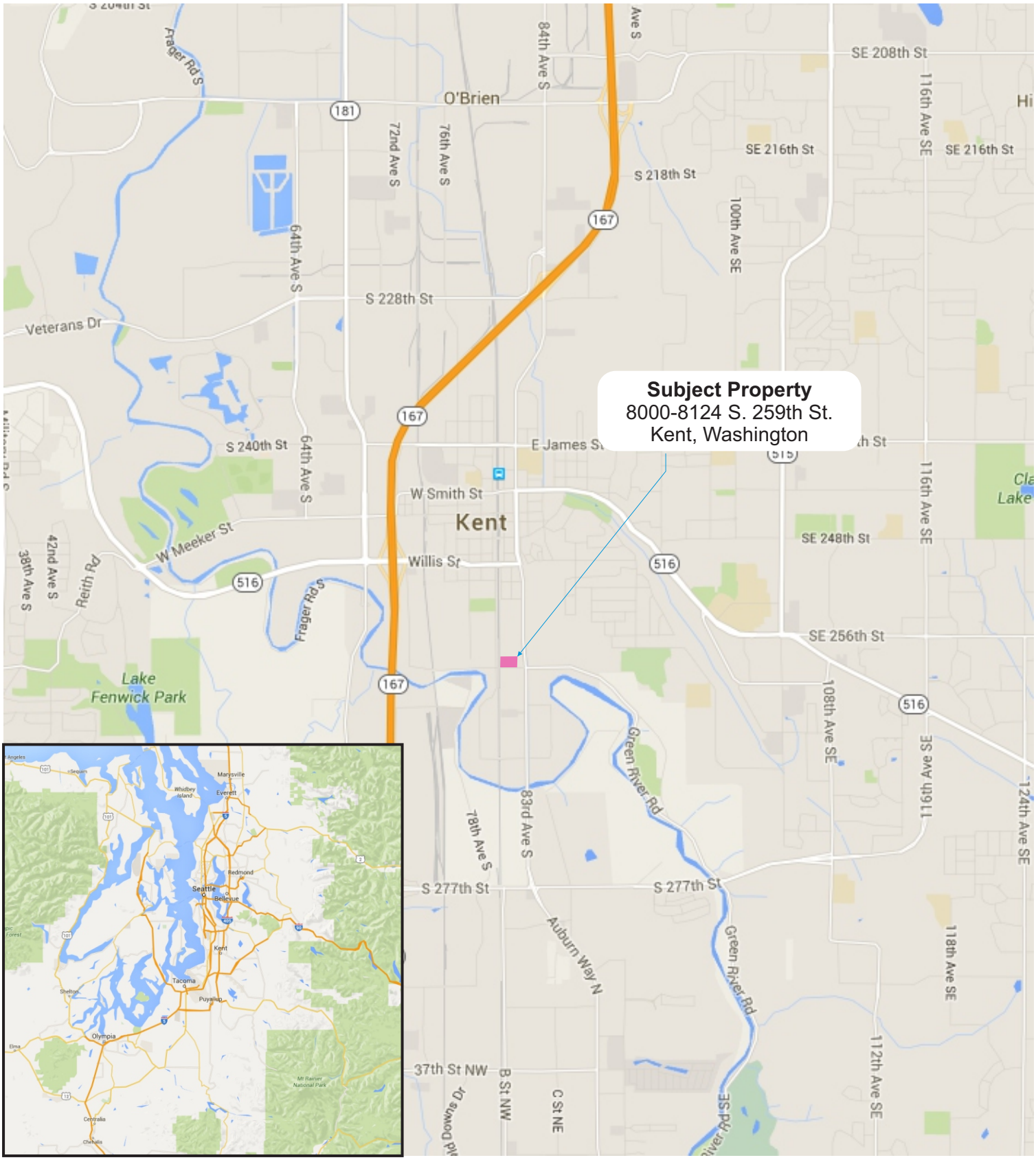
Figure 1: Site Vicinity MapFigure 2: Aerial Photograph 1936

Figure 3: Aerial Photograph 1957

Figure 4: Aerial Photograph 1965

Table 1: Summary of Arsenic in Groundwater Near BLT Trucking

Table 2: Joseph Simon RI/FS “Summary of Reconnaissance Groundwater Analytical Results”



N

Not To Scale

Site Location Map
BLT Trucking: Arsenic in Groundwater
8010 S. 259th St.
Kent, Washington

Date:	November 14, 2022
Completed By:	D. Polivka
Reviewed By.:	S.Spencer
Version:	ECI-001
Project No.:	0611-01-05

Figure No.: 01

ECI environmental services
www.ecoononline.com

N

Not To Scale

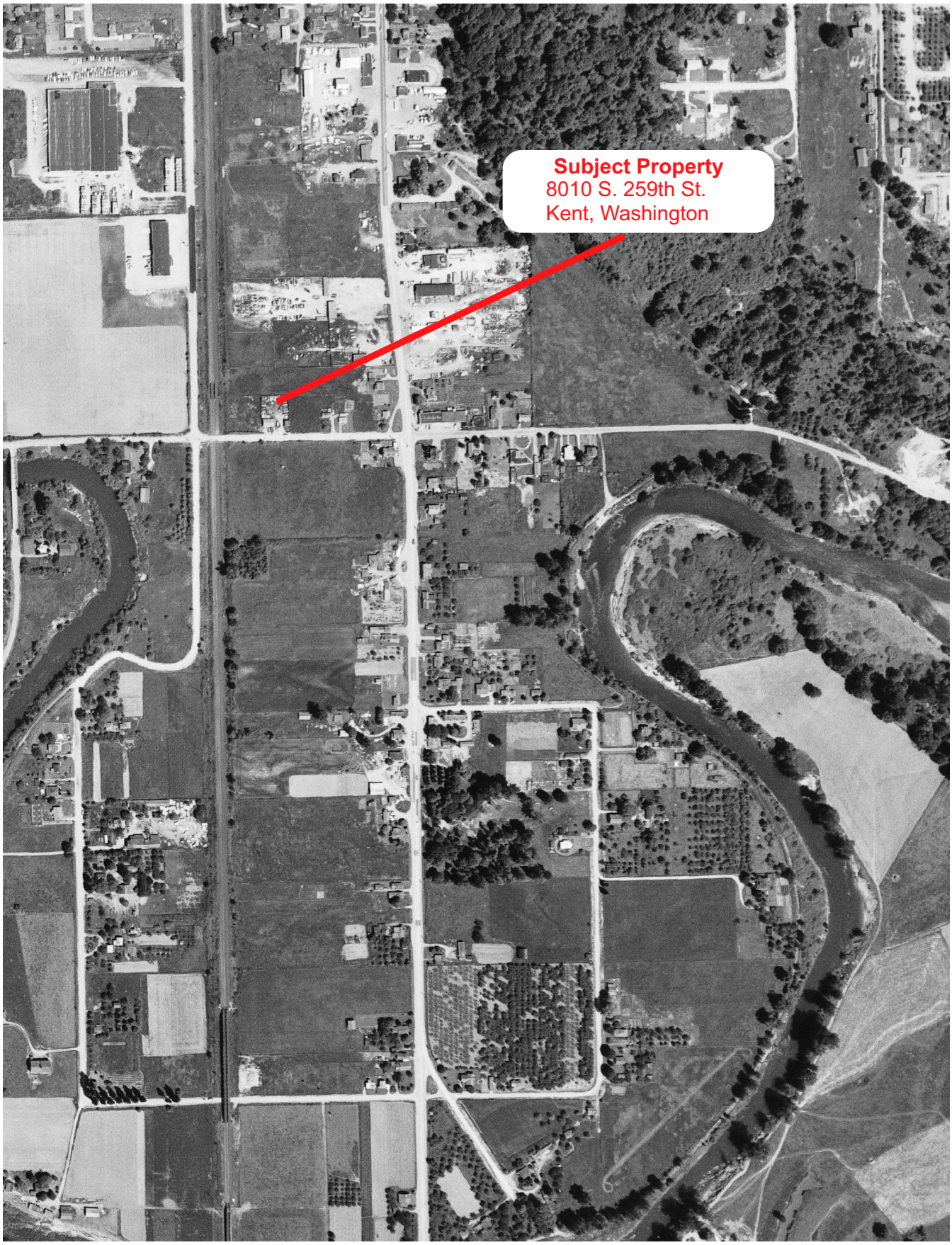
Note: Photograph source from historicaerials.com

Aerial Photograph 1936
BLT Trucking: Arsenic in Groundwater
8010 S. 259th St.
Kent, Washington

Date:	November 14, 2022
Completed By:	D. Polivka
Reviewed By.:	S.Spencer
Version:	ECI-001
Project No.:	0611-01-05

Figure No.: 02

ECI environmental services
www.ecoononline.com



N

Not To Scale

Note: Photograph source from Environmental Data Resources Inc.

Aerial Photograph 1957
BLT Trucking: Arsenic in Groundwater
8010 S. 259th St.
Kent, Washington

Date:	November 14, 2022
Completed By:	D. Polivka
Reviewed By.:	S.Spencer
Version:	ECI-001
Project No.:	0611-01-05

Figure No.: 03

ECI environmental services
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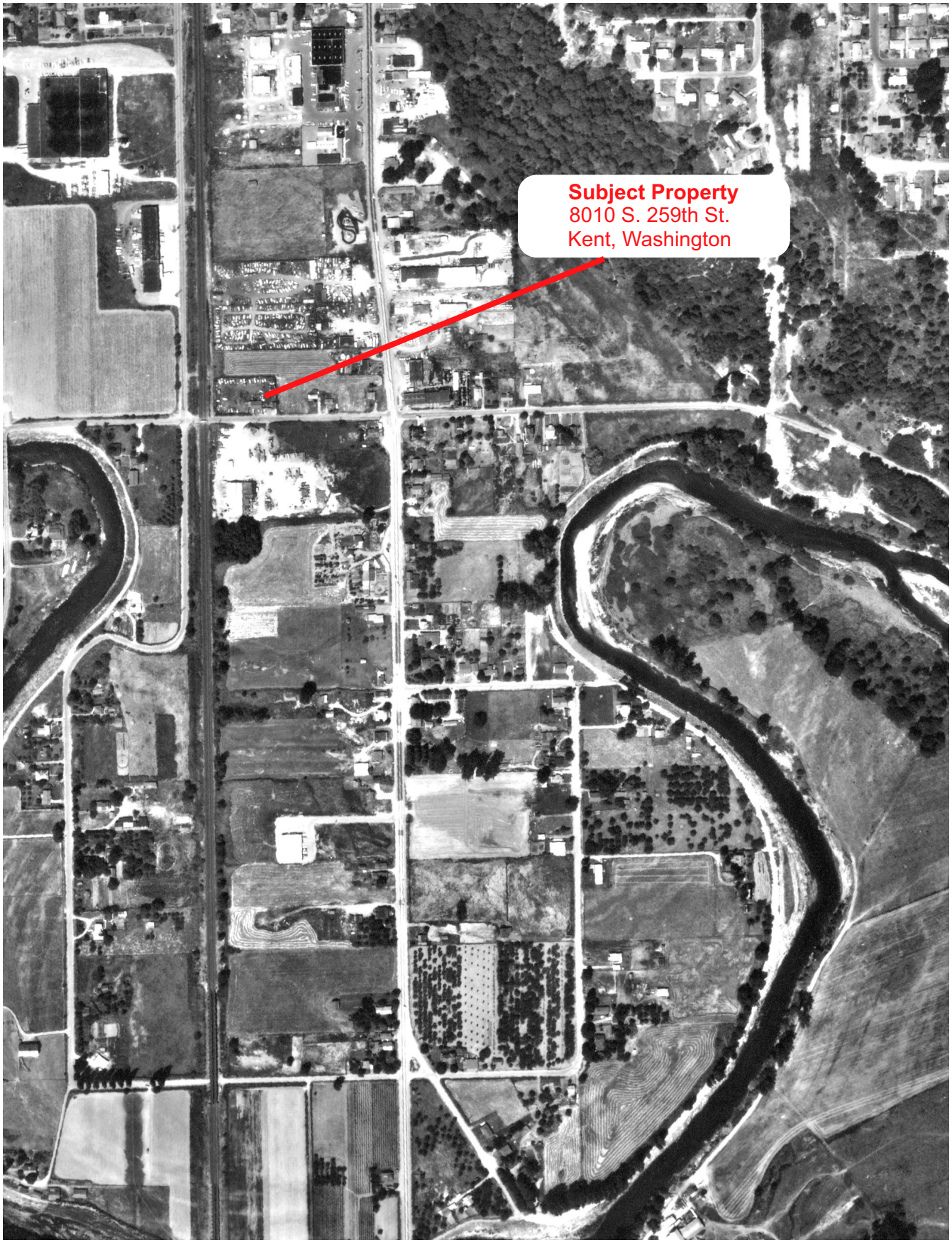

N

Not To Scale

Aerial Photograph 1965
BLT Trucking: Arsenic in Groundwater
8010 S. 259th St.
Kent, Washington

Note: Photograph source from Environmental Data Resources Inc.

Date:	November 14, 2022
Completed By:	D. Polivka
Reviewed By.:	S.Spencer
Version:	ECI-001
Project No.:	0611-01-05

Figure No.: 04

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Table 1
Summary of Arsenic in Groundwater Near BLT Trucking.
8010 259th Street
Kent, Washington

Site	Sample ID	Date Sampled	Totsl Arsenic (µg/L)	Dissovled Arsenic (µg/L)	Ecology/PLIA Status
Bordon Chemical Co/ BNSF 421 1st Ave N	GW/GP-2	5/31/2001	--	79 [1]	No Further Action Dated 5/27/2005
	GW/GP-5		--	9.3	
	GW/GP-7		--	6.7	
	MW-1		20	--	
	MW-4		5.4	--	
Burdic Feed property 301 N Railroad Ave	BFM-A01-GW	6/21/1905	--	29 [2]	Cleanup Started
Driveway (Joseph Simon & Son Well MW-7)) 1025 S. Central Ave	MW-7	12/6/2005	--	12.4 [3]	Awaiting Cleanup
		3/31/2006	11	9.5	
		5/30/2006	3.8	7.7	
		8/29/2006	6	11	
Joseph Simon & Sons	MW-1	3/31/2006	11 [4]	--	NFA Dated 03/02/2009
	MW-2	12/6/2005	5.81	--	
	MW-5	8/29/2006	8.5	--	
	MW-8	3/31/2006	10	<2	
		5/30/2006	2.8	<2	
Protective Coatings Inc. 1215 N 2nd Ave	MW-1	8/12/2008	121 [5]	--	Cleanup Started
		7/17/2014	159	46.9	
		10/7/2014	137	90.8	
		1/13/2015	37.3	17.6	
		6/1/2015	--	83.9	
	MW-4	7/17/2014	74.7	8.9	
		7/17/2014	78.5	23.6	
		10/7/2014	156	67.1	
		1/13/2015	103	20.2	
		6/1/2015	--	11.8	
	MW-5	6/29/2012	27.5	28.9	
		7/17/2014	32.8	3.1	
		10/7/2014	68.7	29.4	
		1/13/2015	59.1	11.7	
		6/1/2015	--	11.8	
Leber Homestead Property 7040 S 262nd St			--	--	NFA Arsenic only in soils attrributed to Asarco. GW not tested.
Pietromonaco Properties 10420, 10426 SE Kent Kangley Rd	EAI B-3		--	<1	Awaiting Cleanup

Table 1
Summary of Arsenic in Groundwater Near BLT Trucking.
8010 259th Street
Kent, Washington

Site	Sample ID	Date Sampled	Totsl Arsenic (µg/L)	Dissovled Arsenic (µg/L)	Ecology/PLIA Status
Kipper & Sons 310 44th St NW Auburn	AMW-01-081919	8/19/2019	18.8 [6]	17.2	Cleanup Started
	AMW-02-081919		10.1	9.93	
	AMW-03-081919		23	23.5	
	AMW-04-081919		68.1	54	
	AMW-05-081919		17.3	18.6	
	B3-WATER	9/4/2008	120	--	
	FRB1-WATER	7/6/2018		69	Note report data tables do not reflect reanalyses to remove "ca" flag This table does
	FRB2-WATER			21	
	FRB3-WATER			63	
	FRB4-WATER			16	
	FRB5-WATER			17	
Heritage Bank 4th Ave N & W James St	SP-1 GW	7/24/2012	--	10.8 [7]	Awaiting Cleanup
	SP-2 GW		--	14.4	
	SP-3 GW		--	1.89	
Modern Machinery 22431 83rd Ave S	MW-1	6/19/1997		27 [8]	NFA with an Environmental Covenant Dated 02/25/2000
		7/14/1997	60	62	
	MW-2	8/21/1997	34	33	
	MW-3	8/21/1997	21	22	
BLT Trucking 8010 S 259th St	MW-1	3/30/2021	6.4	<3.0	
		6/15/2021	5.9	18	
		9/23/2021	3.1	--	
		11/17/2021	6.5	--	
	MW-2	3/30/2021	6.9	<3.0	
		6/15/2021	<3.0	--	
		9/23/2021	<3.0	--	
		11/17/2021	3.3	--	
	MW-3	3/30/2021	3.4	--	
		6/15/2021	6.7	9.1	
		9/23/2021	<3.0	--	
		11/17/2021	<3.0	--	
	MW-4	3/30/2021	<3.0	--	
		6/15/2021	4.3	--	
		9/23/2021	7.4	<3.0	
		11/17/2021	19	--	
	MW-5	3/30/2021	4.3	--	
		6/15/2021	17	23	
		9/23/2021	<3.0	--	
		11/17/2021	<3.0	--	
Ecology MTCA Method A Clean Up Levels			5	5	

Table 1
Summary of Arsenic in Groundwater Near BLT Trucking.
8010 259th Street
Kent, Washington

Site	Sample ID	Date Sampled	Totsl Arsenic (µg/L)	Dissovled Arsenic (µg/L)	Ecology/PLIA Status

[1] The results of the Phase II investigation of the Borden property revealed the presence of elevated concentrations of arsenic in groundwater in the southwestern portion of the Borden facility. These elevated concentrations were suspected to be emanating from the Northwest Metal Products Company facility that was formerly located to the southwest ofthe BNSF Property. Metals other than arsenic may have also been released from this facility. (**BNSF Property Phase II Site Assessment Report, URS, July 12,2001**)

[2] Dissolved arsenic was detected above MTCA Method A cleanup criterion on the northeast comer of the parcel (Figure 2). The source of the elevated arsenic concentrations in groundwater is unknown. Contamination in groundwater was not addressed in this remedial action. (**Independent Rremedial Action Report; Burdic Feed Property : Shannon & wilsopn Inc. October 2000**)

[3] This Well was part of the Joseph Simon site. The contamination at MW-7 was determined by Ecology to not be part of the Joseph Simon & Sons site. **(Ecology ERTS File 600012 08/16/2007 and Ecololgy Joseph simon NFA letter, August 16, 2007**)

[4] This data reflects post-remediation sampling after the shallow arsenic contaminated soils at 1 to generally 3 feet was excavatedfor removal and were one time occurrances of arsenic.

The consultant researched regional data from the USGS , King Counnty, and the water Resources Program They concluded "Although specific groundwater sample locations do not appear to be in the immediate vicinity of the Joseph Simon and Sons site, the King County reports illustrate that arsenic concentrations above the MTCA Method A cleanup level of 5 ug/L are a common occurrence in the South King County area. The arsenic concentrations detected in groundwater samples collected at the Joseph Simon and Sons site appear to be consistent with those presented in the King County reports and appear to be indicative of regional background concentrations" (**Shallow Groundwater Investigation - Joseph Simon and Sons Site , Kennedy Jenks Consultants June 1, 2007**)

[5] Only upgradient wells shown here. Site was a metal plating facility. "As documented in prior reports, based on the widespread regional prevalence of arsenic in groundwater, and the continued industrial use in the vicinity of the Property, arsenic is not considered a COC for the Site." (**Cleanup Action Report 1215 2nd Avenue North and 1208 4th Avenue, Kent, Washington- PCC Aerostructures, Inc, GHD Services Inc. January 26, 2022**)

[6] Elevated arsenic in groundwater represents naturally occurring groundwater conditions and not the result of a release of arsenic to groundwater, based on the evidence discussed in Section 2.3.3. (**Remedial Investigation Report, Puget Sound Coatings Auburn Property-**

[7] Dissolved arsenic was detected in ground water at the subject property above the MTCA Method A ground water cleanup level. No potential on-site sources have been identified that would likely have contributed to these elevated arsenic concentrations. Furthermore, arsenic concentrations in soil (both fill and native soils) are consistent with recognized background levels for the Puget Sound area 1 and were below the applicable MTCA Method A soil cleanup level. Based on these Phase II findings, the elevated arsenic concentrations in ground water are originating from an offsite source. (**Phase II Environmental Site Assessment; Proposed Kent Branch NEC 4"' Avenue North & North James Street Kent, Washington; Associated Earth Sciences, Inc., August 7, 2012)**

[8] Based on available information, the arsenic concentrations detected in the groundwater samples collected from the onsite wells represent regional shallow groundwater quality conditions. The data collected during this investigation do not indicate that an onsite source of arsenic (that contributes to the dissolved arsenic concentrations in shallow groundwater) is present. (**Remediation Work by Seller, Pacific North Equipment Company, Kent, Washington; Kennedy/Jenks Consultants, December 1997**)

TABLE 2

SUMMARY OF RECONNAISSANCE GROUNDWATER ANALYTICAL RESULTS
TPH, METALS, PCBs, PAHs, and VOCs ANALYSES
JOSEPH SIMON AND SONS, KENT, WASHINGTON

Analyte	Sample Id	RG-1[a]	RG-2	RG-3	RG-4	RG-5	RG-6	RG-7	SB-03-RGW[b]	SB-05-RGW	SB-6-RGW	SB-8-RGW	SB-14-RGW	SB-15-RGW	SB-16-RGW	SB-17-RGW	Cleanup Level[c]	MTCA Method
	Date	06/20/1995	06/20/1995	06/20/1995	06/20/1995	06/20/1995	06/20/1995	06/20/1995	11/18/2003	10/20/2003	10/20/2003	10/20/2003	10/20/2003	10/20/2003	10/20/2003	10/15/2003		
TPH[d] (µg/l)																		
Gasoline-range [e]		--- [f]	---	---	---	---	---	---	---	<100 [g]	<100	<100	<100	<100	<100	<100	800[h]	A [i]
Diesel-range [e]		---	---	---	---	---	---	---	---	<200	<200	<200	<200	<200	<200	<200	500	A
Oil-range[e]		---	---	---	---	---	---	---	---	<400	<400	<400	<400	<400	<400	<400	500	A
Total Metals [j] (µg/l)																		
Silver		<3.0	---	<3.0	---	---	---	<3.0	1.11	<1.00	---	---	<1.00	<1.00	<1.00	<1.00	80	B[k]
Arsenic		**30**	**---**	**13**	---	---	---	**21**	***32.7***	***10.6***	---	---	***9.66***	***7.03***	***7.22***	***44.3***	5	A
Beyllium		2	---	2	---	---	---	1	<10.0	<1.00	---	---	<1.00	<1.00	<1.00	3.41	32	B
Cadmium		3	---	2	---	---	---	3	***54.4***	4.17	---	---	<1.00	<1.00	<1.00	2.76	5	A
Chromium [l]		**227**	---	**218**	---	---	---	**226**	***127***	25.1	---	---	16.2	14.1	13.0	***180***	50	A
Copper		160	---	230	---	---	---	195	938	150	---	---	58.0	26.2	31.8	452	592	B
Mercury		0	---	0	---	---	---	0.4	***3.27***	<1.00	---	---	<1.00	<1.00	<1.00	<1.00	2	A
Nickel		120	---	150	---	---	---	130	255	55.1	---	---	15.1	15.1	14.3	143	320	B
Lead		**27**	---	**34**	---	---	---	**29**	***2,420***	***542***	---	---	8.19	***108***	***30.6***	***401***	15	A
Antimony		**60**	---	<50	---	---	---	<50	***16.2***	<3.00	---	---	<3.00	<3.00	<3.00	3.00	6.4	B
Selenium		<50	---	<50	---	---	---	<50	2.22	<1.00	---	---	<1.00	<1.00	<1.00	3.26	80	B
Thallium		<50	---	<50	---	---	---	<50	<1.00	<1.00	---	---	<1.00	<1.00	<1.00	***1.14***	1.12	B
Zinc		251	---	330	---	---	---	257	2,880	904	---	---	36.4	72.7	52.6	610	4800	B
PCBs (µg/l) [m]		---	---	---	---	---	---	---	---	---	ND [n]	---	---	---	---	---	0.1	A
PAH (µg/l) [o]		---	---	---	---	---	---	---	---	ND	ND	---	ND	ND	ND	ND	0.1[p]	A
VOCs (µg/l) [q]																		
Acetone		1.1	1.3	2.0	1.6	<1.0	2.0	2.9	---	ND	---	---	---	---	---	ND	800	B
Carbon Disulfide		0.5	0.4	0.6	2.1	0.3	2.0	6.9	---	ND	---	---	---	---	---	ND	800	B

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SUMMARY OF RECONNAISSANCE GROUNDWATER ANALYTICAL RESULTS
TPH, METALS, PCBs, PAHs, and VOCs ANALYSES
JOSEPH SIMON AND SONS, KENT, WASHINGTON

Analyte / Sample Id / Date	SB-20-RGW 11/18/2003	SB-21-RGW 10/13/2003	SB-25-RGW 10/15/2003	SB-26-RGW 11/18/2003	SB-28-RGW 10/13/2003	SB-29-RGW 10/14/2003	SB-30-RGW 10/13/2003	SB-31-RGW 10/21/2003	SB-32-RGW 10/21/2003	SB-36-RGW 11/18/2003	SB-37-RGW 11/18/2003	SB-39-RGW 10/21/2003	SB-42-RGW 10/15/2003	SB-RGW-201 10/15/2003	SB-43-RGW 10/14/2003	SB-50-RGW 10/15/2003	Cleanup Level[c]	MTCA Method
TPH[d] (µg/l)																		
Gasoline-range [e]	---[f]	<100	---	<100	<100	<100	---[d]	---	---	---	---	---	---	---	---	<100[e]	800[h]	A[i]
Diesel-range [e]	---	<200	---	<200	<200	<200	<200	<200	---	---	<200	<200	---	<200	<200	<200	500	A
Oil-range[e]	---	<400	---	<400	<400	<400	<400	<400	---	---	<400	<400	---	<400	<400	<400	500	A
Total Metals [j] (µg/l)																		
Silver	<1.00	---	6.45	2.25	---	---	---	<1.00	<1.00	<1.00	<1.00	---	<1.00	<1.00	---	<1.00	80	B[j]
Arsenic	***32.3***	---	***138***	***277***	---	---	---	***26.8***	***19.7***	***9.83***	***8.41***	---	***27.4***	***38.3***		***7.78***	5	A
Beyllium	2.11	---	7.97	21.2	---	---	---	1.59	<1.00	<1.00	<1.00	---	1.16	1.64	---	<1.00	32	B
Cadmium	<1.00	---	***47.3***	***67.0***	---	---	---	***6.08***	<1.00	<1.00	<1.00	---	<1.00	<1.00	---	<1.00	5	A
Chromium [k]	***132***	---	***559***	***1,440***	---	---	---	***84.1***	39.7	5.55	12.8	---	***58.2***	***87.9***	---	1.78	50	A
Copper	213	---	***3,710***	***2,360***	---	---	---	345	73.7	49.8	67.5	---	395	549	---	5.44	592	B
Mercury	0.277	---	***9.04***	***6.05***	---	---	---	<1.00	<1.00	<0.200	<0.200	---	<1.00	<1.00	---	<1.00	2	A
Nickel	102	---	***650***	***937***	---	---	---	93.8	32.6	4.8	7.53	---	37.2	56.5	---	2.20	320	B
Lead	***29.4***	---	***6,640***	***6,350***	---	---	---	***2,540***	12.1	4.26	7.98	---	***57.0***	***79.8***	---	1.49	15	A
Antimony	<3.00	---	***21.5***	3.36	---	---	---	***7.00***	<3.00	<3.00	<3.00	---	<3.00	<3.00	---	<3.00	6.4	B
Selenium	2.82	---	7.30	11.8	---	---	---	1.23	<1.00	<1.00	<1.00	---	1.30	2.08	---	<1.00	80	B
Thallium	1.07	---	***2.56***	***4.14***	---	---	---	<1.00	<1.00	<1.00	<1.00	---	<1.00	<1.00	---	<1.00	1.12	B
Zinc	226	---	***7,210***	***6,870***	---	---	---	1,030	77.7	14.6	26.7	---	83.6	124	---	<1.00	4800	B
PCBs (µg/l) [l]	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	0.1	A
PAH (µg/l) [n]	---	---	---	---	---	---		---	---	ND[k]	ND	ND	ND	---	---	ND	0.1[o]	A
VOCs (µg/l) [p]	---	---	---	---	---	---	---	---	---	---	---	---	ND	---	ND	ND	variable	A/B

TABLE 2

SUMMARY OF RECONNAISSANCE GROUNDWATER ANALYTICAL RESULTS
TPH, METALS, PCBs, PAHs, and VOCs ANALYSES
JOSEPH SIMON AND SONS, KENT, WASHINGTON

Analyte / Sample Id / Date	SB-RGW-200 10/15/2003	SB-51-RGW 10/14/2003	SB-53-RGW [a] 10/15/2003	SB-54-RGW 10/15/2003	SB-55-RGW 10/21/2003	SB-59-RGW 10/21/2003	SB-62-RGW 11/18/2003	SB-63-RGW 11/18/2003	SB-64-RGW 11/18/2003	SB-65-RGW 11/18/2003	SS-1-RGW 11/18/2003	SS-6-RGW 11/18/2003	RGW-206 11/18/2003	SS-25-RGW 11/19/2003	SS-31-RGW 11/19/2003	Cleanup Level[c]	MTCA Method
TPH[b] (µg/l)																	
Gasoline-range [c]	<100	---	---[d]	<100[e]	<100	<100	---	---	---	---	---	---	---	---	---	800[h]	A [i]
Diesel-range [c]	<200	<200	<200	<200	<200	<200	---	---	---	---	---	---	---	---	---	500	A
Oil-range [c]	<400	<400	<400	<400	<400	<400	---	---	---	---	---	---	---	---	---	500	A
Total Metals [j] (µg/l)																	
Silver	---	---	---	<1.00	<1.00	<1.00	1.12	<1.00	<1.00	<1.00	<1.00	<1.00	<1.00	<1.00	1.51	80	B[j]
Arsenic	---	---	---	***7.12***	***19.5***	2.20	***115***	***44.2***	***24.3***	***8.62***	***47.3***	***21.5***	***13.7***	***23.6***	***31.8***	5	A
Beyllium	---	---	---	<1.00	2.16	<1.00	15.3	5.49	1.03	<1.00	6.37	2.20	1.50	6.78	1.70	32	B
Cadmium	---	---	---	<1.00	<1.00	<1.00	4.84	2.23	1.37	<1.00	3.33	<1.00	<1.00	2.80	***6.65***	5	A
Chromium [k]	---	---	---	16.0	***53.4***	4.41	***356***	***192***	***55.8***	***16.8***	***262***	***96.2***	***58***	***119***	***348***	50	A
Copper	---	---	---	47.0	213	12.6	***988***	371	116	76.5	578	192	113	195	***1640***	592	B
Mercury	---	---	---	<1.00	0.206	<1.00	0.666	0.430	0.311	<0.200	0.564	<0.200	<0.200	<0.200	0.977	2	A
Nickel	---	---	---	12.3	59	4.34	***611***	214	51.6	12.0	291	81.9	55.7	162	***356***	320	B
Lead	---	---	---	6.44	***25.5***	2.80	***112***	***40.6***	***201***	8.86	***81.8***	***18.7***	***11.6***	***32.6***	***120***	15	A
Antimony	---	---	---	<3.00	<3.00	<3.00	<3.00	<3.00	<3.00	<3.00	<3.00	<3.00	<3.00	<3.00	<3.00	6.4	B
Selenium	---	---	---	<1.00	1.46	<1.00	8.32	8.00	2.18	<1.00	<1.00	2.02	1.59	6.14	5.19	80	B
Thallium	---	---	---	<1.00	<1.00	<1.00	***3.44***	1.04	<1.00	<1.00	***1.62***	<1.00	<1.00	<1.00	***4.3***	1.12	B
Zinc	---	---	---	38.5	164	13.5	1,080	613	396	35.8	862	160	111	494	1370	4800	B
PCBs (µg/l) [l]		---	---	---	---	---	---	---	---	---	---	---	---	---	---	0.1	A
PAH (µg/l) [n]	---	ND	---	---	---	ND [k]	---	---	---	---	---	---	---	---	---	0.1[o]	A
VOCs (µg/l) [p]	ND	ND	ND	ND	ND	ND	---	---	---	---	---	---	---	---	---	variable	A/B

Notes:

(a) Reconnaissance groundwater sample.
(b) Reconnaissance groundwater sample collected from indicated boring number.
(c) Cleanup level based on Model Toxics Control Act (MTCA) groundwater criteria [(WAC) 173-340-720].
(d) TPH=Total Petroleum Hydrocarbons
(e) Gasoline-range TPH analyzed by Ecology Method NWTPH-Gx; diesel- and oil- range TPH analyzed by Ecology Method NWTPH-Dx Extended .
(f) '---' denotes indicated analysis was not performed for indicated sample .
(g) '<' denotes analyte was not detected at a concentration above the laboratory detection limit.
(h) Cleanup level is based on the MTCA Method A groundwater cleanup level for gasoline range TPH with benzene present.
(i) Cleanup level is based on the MTCA Method A groundwater cleanup level for unrestricted land uses (WAC 173-340-720-1).
(j) Total metals by EPA 6000/7000 Series Method.
(k) MTCA Method B groundwater cleanup level based on WAC 173-340-720(4)(b).
(l) Cleanup levels are for Total Chromium.
(m) Total Polychlorinated Biphenyls (PCBs) by EPA Method 8082.
(n) ND=Not detected at or above the laboratory detection limit.
(o) Polynuclear Aromatic Hydrocarbons by EPA Method 8270.
(p) Cleanup level for cPAHs is based on the MTCA Method A soil cleanup level for unrestricted land uses.
(q) Volatile Organic Compounds by EPA Method 8260B.

Analytes detected above the MTCA cleanup levels are shown in bold and italics.
µg/l = micrograms per liter