

SITE CHARACTERIZATION/ FOCUSED FEASIBILITY STUDY REPORT

EXXONMOBIL/ADC PROPERTY, ECOLOGY SITE ID 2728
EVERETT, WASHINGTON
PROJECT # 6103180009
EXXONMOBIL OIL CORPORATION/AMERICAN DISTRIBUTING COMPANY

Prepared for:

EXXONMOBIL OIL CORPORATION

Oakland, California

AMERICAN DISTRIBUTING COMPANY

Marysville, Washington

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LIST OF ACRONYMS AND ABBREVIATIONS

μg/L microgram per liter

1996 Order Agreed Order DE-95TC-N402 1998 Order Agreed Order DE-98TCP-N223 2010 Order Agreed Order DE-6184

ADC American Distributing Company
AGRA AGRA Earth & Environmental, Inc.
AMEC AMEC Earth & Environmental
AMEC Earth & Environmental, Inc.

AO Agreed Order

ARAR applicable or relevant and appropriate requirement

Aspect Aspect Consulting
AST aboveground storage tank

bgs below ground surface
BNSF BNSF Railway Company

BTEX benzene, toluene, ethylbenzene, and xylenes

CFR Code of Federal Regulations
Chevron Corporation
cm/sec centimeter per second
COC constituent of concern

CLARC Cleanup Levels and Risk Calculation

cPAH carcinogenic polycyclic aromatic hydrocarbon

CPOC conditional point of compliance

CSM conceptual site model
CSO combined sewer overflow

CSTO California Street/Terminal Avenue Overcrossing

CY cubic yard

DCAP Draft Cleanup Action Plan

DO dissolved oxygen

Ecology Washington State Department of Ecology

EDR Engineering Design Report
EPA Environmental Protection Agency

ESA Endangered Species Act
Eurofins Eurofins Calscience
ExxonMobil ExxonMobil Oil Corporation

°F degrees Fahrenheit
FFS focused feasibility study

former KC property former Kimberly-Clark property located north of the Property, currently

owned by Port of Everett

FS feasibility study

GAC granular activated carbon ISS in situ soil stabilization

ITRC Interstate Technology and Regulatory Council

KC Kimberly-Clark Corporation
LNAPL light nonaqueous-phase liquid
LPH liquid-phase petroleum hydrocarbons

mg/kg milligram per kilogram MLLW mean lower low water

MNA monitored natural attenuation

Mobil Mobil Corporation
MTBE methyl tertiary-butyl ether
MTCA Model Toxics Control Act

NAVD88 North American Vertical datum of 1988

NPV net present value

NRWQC National Recommended Water Quality Criteria

ORP oxidation-reduction potential
PAH polycyclic aromatic hydrocarbon
PCL preliminary cleanup level

POC point of compliance
PRB permeable reactive barrier

Premier Environmental Services, LLC

Property two contiguous parcels located at 2717 and 2731 Federal Avenue, in Everett,

Washington, owned by ExxonMobil and by ADC, respectively

PSI Puget Sound Initiative
PTI PTI Environmental Services
PVC polyginal chloride

PVC polyvinyl chloride
RAO remedial action objective
RCW Revised Code of Washington
RI remedial investigation
RMP risk management plan

RZA Rittenhouse-Zeman & Associates, Inc.

SAP sampling and analysis plan SC site characterization

SC/FFS site characterization and focused feasibility study

SEPA State Environmental Policy Act

Site ExxonMobil and ADC Property and portions of neighboring parcels where

releases of hydrocarbon contamination on the Property may have migrated

SPOC standard point of compliance Standard Oil Company of California

SVE soil vapor extraction

SWCA Environmental Consultants
Texaco Texaco Refining and Marketing, Inc.
TPH total petroleum hydrocarbons

TPH-D total petroleum hydrocarbons as diesel
TPH-G total petroleum hydrocarbons as gasoline
TPH-O total petroleum hydrocarbons as oil

USC United States Code
UST underground storage tank

Vigor Marine LLC

VOC volatile organic compound
WAC Washington Administrative Code

Wood Environment & Infrastructure Solutions, Inc.

WRCC Western Regional Climate Center

WSP USA Environment & Infrastructure Inc.

1 INTRODUCTION

Please be aware that, effective September 21, 2022, Wood Environment & Infrastructure Solutions, Inc., was acquired by WSP. Due to the acquisition, we have changed our name to WSP USA Environment & Infrastructure Inc. No other aspects of our legal entity or capabilities have changed.

WSP USA Environment & Infrastructure Inc. (WSP), prepared this Site Characterization/Focused Feasibility Study (SC/FFS) Report on behalf of ExxonMobil Oil Corporation (ExxonMobil) and the American Distributing Company (ADC) for the ExxonMobil/ADC Property (the Property) located at 2717 and 2731 Federal Avenue in Everett, Washington, owned by ADC and ExxonMobil, respectively. Historical releases of petroleum products have been documented due to former operation of bulk petroleum storage, transfer, and distribution facilities on the Property and operations of other companies on nearby parcels. Consistent with Agreed Order (AO) No. DE 6184 (2010 Order), entered into between ExxonMobil, ADC, and Ecology in March 2010, the Site is defined as the Property owned by ExxonMobil and ADC, plus those portions of neighboring properties where releases of hazardous substances at the Site may have migrated or otherwise come to be located. The Site has a Washington State Department of Ecology (Ecology) Facility ID of 2728. The extent of soil and groundwater contamination resulting from the historic operations on the Property has been sufficiently identified for purposes of this SC/FFS and for development of remediation alternatives. This SC-FFS Report will identify the recommended cleanup alternative for the Site. The final cleanup remedy for the Site will be documented in the Draft Cleanup Action Plan (DCAP), which will be completed after the SC/FFS Report has been finalized and approved by Ecology.

1.1 PURPOSE OF THE SC/FFS REPORT

This SC/FFS Report was prepared to meet the requirements of the 2010 Order and in accordance with Ecology's Model Toxics Control Act (MTCA) Cleanup Regulations (Washington Administrative Code [WAC] 173-340). This SC/FFS Report describes the nature and extent of Site soil and groundwater contamination, presents an evaluation of potentially applicable remediation alternatives to clean up Site contamination, and identifies a recommended final cleanup action to comprehensively address contamination in soil and groundwater at the Site. The recommended alternative will be developed more fully and described in detail in the DCAP. This SC/FFS will serve as the basis for preparing the DCAP to be developed for the Site, as specified by the 2010 Order. The DCAP will be prepared by Cardno.

The purposes of this SC/FFS are to:

- document the history of past Property ownership and operations conducted on the Property and surrounding properties;
- summarize past investigation and interim remedial activities conducted at the Site;
- identify constituents of concern (COCs) for the Site and present preliminary cleanup standards for the Site established pursuant to the MTCA regulations;
- document the nature and extent of Site contamination, based on investigations conducted to date at the Site;
- present a conceptual site model (CSM) describing the potential exposure pathways and potentially exposed receptors for Site contamination;
- establish remedial action objectives (RAOs) for the Site;
- identify preliminary cleanup levels (PCLs) for soil and groundwater;
- identify and evaluate alternative remedial actions to achieve the RAOs and PCLs at the Site in accordance with the MTCA regulations;
- select the recommended remedial action alternative; and
- provide information necessary to complete the DCAP.

1.2 ORGANIZATION OF THE REPORT

This SC/FFS Report is organized into the following sections:

- Section 1, Introduction: Presents the report purpose and outlines the organization of the SC/FFS Report.
- Section 2, Site description: Describes the physical setting and regulatory background for the Site.
- Section 3, Previous environmental characterization/sampling investigations: Presents a brief overview of previous environmental investigations conducted for the Site.
- Section 4, Summary of past remediation activities: Presents a brief overview of previous interim remedial measures implemented at the Site.
- Section 5, Constituents of concern and preliminary cleanup standards: Presents the COCs and discusses PCLs and the point of compliance (POC) for the Site.
- Section 6, Nature and extent of contamination: Summarizes locations and degree of contamination in soil and groundwater.
- Section 7, Aquifer and tidal studies: Presents an overview of studies conducted at the Site to evaluate groundwater conditions and tidal influence on groundwater flow patterns.
- Section 8, Conceptual site model: Presents the CSM for the Site and an evaluation of potential receptors and exposure pathways.
- Section 9, Remedial action objectives: Defines RAOs for the Site.
- Section 10, Remediation considerations: Outlines key considerations to be taken into account for the development and evaluation of remedial alternatives and for subsequent design of the preferred cleanup action.
- Section 11, Remediation technologies: Presents a focused evaluation of potential remedial technologies that may be appropriate for soil and groundwater at the Site.
- Section 12, Development of remediation alternatives: Describes the remedial alternatives considered for soil and groundwater remediation at the Site.
- Section 13, Evaluation of alternatives: Evaluates and compares the remedial alternatives described in Section 12.
- Section 14, Preferred alternative: Describes the recommended remedial alternative.
- Section 15, References: Provides a list of references cited in this report.

2 SITE DESCRIPTION

This section describes the historical, physical, and environmental setting of the Property and surrounding area, and presents the regulatory and compliance history relevant to the SC/FFS Report. As defined in the 2010 Order, the Site is defined as the property owned by ExxonMobil and ADC, plus those portions of neighboring properties where releases of hazardous substances due to ExxonMobil or ADC operations may have migrated or otherwise come to be located. In addition to historic operations by ExxonMobil and ADC, another source of contamination at the Site includes releases from former train car loading racks located east of the Property, under the current Terminal Avenue Overpass. The ExxonMobil–ADC Property occupies 0.86 acre of land and consists of two parcels (Figure 2-1). The northern parcel at 2717 Federal Avenue occupies approximately two-thirds of the Property (0.65 acre) and will be referred to as the ADC Parcel. The southern parcel at 2731 Federal Avenue occupies approximately one-third of the Property (0.21 acre) and will be referred to as the ExxonMobil Parcel. The extent of the site and the parcel boundaries are shown on Figure 2-2.

2.1 DESCRIPTION OF PROPERTY AND VICINITY

The Property is located east of Federal Avenue, west of the Terminal Avenue Overpass, and immediately south of the former Kimberly-Clark Corporation (KC) property and former Everett Avenue in the northwest portion of Everett, Snohomish County, Washington (Figures 2-1 and 2-2). The former KC property is presently owned by the Port of Everett, but will be referred to in this report as the "former KC property" or the "KC property."

2.1.1 PROPERTY OWNERSHIP

The ADC parcel is owned by the Miller Trust (Cecilia Beverly Miller, beneficiary), and the ExxonMobil parcel is owned by ExxonMobil.

2.1.2 CURRENT LAND USE

The Property is an asphalt-paved empty parking lot. No structures are present on the Property. The Property and other parcels in the immediate vicinity are shown on Figure 2-2. In addition to the Property, the Site includes portions of the surrounding properties, including portions of former Everett Avenue, Federal Avenue, and the Port of Everett properties just west of Federal Avenue. It also includes portions of the City of Everett right-of-way east and south of the Property, the BNSF Railway Company (BNSF) parcel, the BNSF railway corridor right-of-way east of the Property, and the land under the Terminal Avenue overpass (Figure 2-2). Current land use for these properties is described in Section 2.1.3.

2.1.3 SURROUNDING PROPERTIES

The Property is adjoined by the following properties (Figure 2-2):

- The former KC property is located immediately north of the ADC Parcel, at 2600 Federal Avenue. The KC property was used for several decades for wood and paper products manufacturing. It housed former bulk petroleum storage tanks and currently includes a warehouse near the southern end adjacent to the ExxonMobil/ADC Property. Most of the former paper manufacturing facility was demolished in 2012. The former KC property also includes a portion of the former Everett Avenue, north of the ADC Parcel. The former KC property is currently owned by the Port of Everett.
- A City of Everett right-of-way is located immediately east of the Property. The City of Everett right-of-way is currently paved with asphalt and is otherwise unoccupied.
- Another City of Everett right-of-way is located immediately south of the Property. This right-of-way was formerly part of the ExxonMobil Parcel but was transferred to the City of Everett as part of the Terminal Avenue Overpass project. This right-of-way is currently paved with asphalt and is otherwise unoccupied.
- Federal Avenue is located immediately west of the Property. Federal Avenue is a public street and City of Everett utility corridor.

An active BNSF rail line and adjoining BNSF-owned parcels are located east and south of the Property, beyond the City of Everett rights-of-way. The Terminal Avenue Overpass crosses the BNSF railway corridor and the City of Everett right-of-way, and then joins Federal Avenue at grade near the southwest corner of the ExxonMobil Parcel. The properties to the west, beyond Federal Avenue, are owned by the Port of Everett, and several properties are occupied by various lessees, including Dunlap Towing. The shoreline of Port Gardner Bay is approximately 300 feet northwest of the Property.

2.2 LAND USE AND OPERATIONAL HISTORY OF THE PROPERTY AND SURROUNDING PROPERTIES

This section briefly summarizes historical land use and operations at the Property and the surrounding area. Selected historical maps and other documentation for these parcels are provided in Appendix A. Additional historical documentation is available in the FFS Work Plan (AMEC Earth & Environmental, 2010a).

Native Americans were living along the shoreline of Port Gardner Bay as it existed at the time of initial European contact. Extensive development began in the late 19th century, when the shoreline was located in the general vicinity of the present-day Federal Avenue. The Property and surrounding properties were used for storage and transfer of petroleum and petroleum products beginning as early as 1920. Additional property development, including infilling of the bay west of the Property, continued until the present-day shoreline was established by 1976.

Figures 2-3 through 2-6 illustrate the recent history of the Property and its surroundings, as reconstructed using historical aerial photographs. Aerial photographs from 1947, 1967, and 1993 showing multiple aboveground storage tanks (ASTs) and extensive infrastructure are presented on Figures 2-3 through 2-5. Figure 2-6 shows the former features of the Property and neighboring parcels visible on historical maps and aerial photographs of the immediate vicinity, superimposed over a more recent aerial photograph from May 2013. This figure gives an indication of the types and locations of facilities that have been present on and near the Property. Additional historical maps and aerial photographs are presented in Appendix A.

2.2.1 EXXONMOBIL/ADC PROPERTY

A search of records at the Washington State Department of Archaeology and Historic Preservation in Olympia and at the Everett Public Library's Northwest History Room failed to identify any evidence of previously recorded archaeological sites, historic buildings, or traditional cultural properties located on the Property.

Based on the 1902 Sanborn Fire Insurance map (Appendix A), the earliest known development of the Property consisted of wooden residential dwellings that lined the shoreline of Port Gardner Bay near present-day Federal Avenue. The map labels the Property as "marsh," suggesting that these dwellings were likely constructed on native soils. The 1914 Sanborn map (Appendix A) indicates that the entire Property had become vacant. In 1915, the City of Everett passed Ordinance No. 1674 granting the Standard Oil Company of California (Standard), now known as Chevron Corporation (Chevron), permission to construct a tank farm consisting of three ASTs on Lot 1 of Block 619 (the northern portion of the ADC Parcel), with piping leading to Standard's dock on the waterfront (Appendix A). However, it is not certain that the tank farm was actually built.

Historical documents show that a majority of the Property and surrounding properties were covered by a garbage dump in 1917 (Appendix A). A 1946 plot plan of the former ADC facility shows the toe-of-slope of the former garbage dump as of February 15, 1917, and references a City of Everett Engineering department drawing. Extensive background research failed to identify any further evidence that the dump was a formal sanitary landfill that accepted refuse from a City agency or wider geography.

Beginning as early as the 1920s, the Property was used for petroleum bulk storage, transfer, and distribution operations; marine offloading; truck loading; and rail loading and/or unloading of petroleum products that included fuel oils, stove oil, Bunker C fuel oil, diesel, and gasoline. Property use included handling a blend of synthetic and petroleum-based fluids (PS300) specially designed for compressor applications (AGRA 1996a); however, only small quantities (55-gallon drums or smaller) of PS300 were likely used and/or stored at the Property, as lubricating oils were not typically processed in bulk form at the Property.

In 1922, Gilmore Oil Co. Ltd. (predecessor to General Petroleum and later acquired by Mobil Oil Corporation [Mobil]) first leased the Property from the Great Northern Railway of Minnesota (a predecessor to BNSF) for bulk petroleum operations. In 1927, Gilmore Oil Co. Ltd. became an owner of the Property (AMEC Earth & Environmental, 2010a); General Petroleum and successors to the property, which included Mobil and ADC, continued bulk petroleum handling operations. An historical Great Northern Railway map dated 1930 (Appendix A) shows two large ASTs and several structures on the Property. By that time, the shoreline west of the Property had been extended farther into Port Gardner Bay, and several new developments were present on what is now the Port of Everett property across Federal Avenue.

In 1974, Mobil sold the northern two-thirds of the Property (the current ADC Parcel) to Mr. A.P. Miller for use by ADC. Mobil continued to operate a small bulk plant on the southern one-third of the Property (the ExxonMobil Parcel) until 1987. ADC operated a terminal on the ADC Parcel until 1990.

In 1985, recorded structures on the ADC Parcel consisted of two warehouse buildings, a pump house, and two diked fuel storage areas, each of which included two ASTs. In addition, fuel storage tanks were present in the northwest corner of the ExxonMobil Parcel. A 1985 environmental investigation conducted by Rittenhouse-Zeman & Associates, Inc. (RZA), identified evidence of surface spillage on the ExxonMobil Parcel at several locations, including the unloading racks, pump house, and near the outdoor drum storage area, and reported that a number of unintentional releases of petroleum products had occurred in the past due to tank leakage, tank overfills, and surface spills associated with the four ASTs (RZA, 1985). The tanks and other structures on the ExxonMobil Parcel were demolished in approximately 1987. The ExxonMobil Parcel appears to be covered with asphalt with no above-grade structures in the 1993 aerial photograph; several tanks and structures were present on the ADC Parcel in 1993 (Figure 2-5).

By 1990, four large ASTs and five small ASTs, surrounded by the concrete firewall, occupied the northern half of the ADC Parcel. An office building, a warehouse, a boiler room, an oil pump house, loading racks, and overhang canopies were located within the southern portion of the ADC Parcel. In addition, an AST, aboveground piping, and a concrete wall were located within the southern portion of the ADC Parcel. Locations of these former tanks are shown on Figure 2-6.

Peak operations at the bulk fuel tank farm on the Property occurred from the 1920s through early 1980s. ExxonMobil ceased operations in the mid-1980s, and ADC ceased operations in the early 1990s. Any releases of higher range petroleum hydrocarbons to the subsurface would be expected to have occurred during that time period. Thus, releases may have occurred as far back as 90 years ago, and at a minimum 25 years ago. Thus, contaminants that may be present in the subsurface and attributed to these business activities would consist of older, weathered petroleum products.

All structures on the ADC Parcel were demolished in 1998, and in 1999 the Property was capped with asphalt to meet the requirements of AO DE-98TCP-N223 (1998 Order) (Section 4.6). Since then, the Property has been used intermittently as a parking lot by neighboring businesses.

ExxonMobil was formed in 1999 by the merger of Exxon and Mobil. Ownership of the ExxonMobil Parcel passed to the newly formed corporation. Ownership of the southernmost portion of the historical ExxonMobil Parcel was transferred to the City of Everett as part of the Terminal Avenue Overpass project in the early 2000s.

2.2.2 HISTORY OF SURROUNDING PROPERTIES

Several other facilities located north and northeast of the Property also had historical bulk petroleum operations. Additionally, beginning as early as the 1880s several wood and paper products manufacturing facilities lined the shoreline of Port Gardner Bay. Infrastructure at these properties included fuel pipelines, pumping facilities, storage facilities, railroad spurs, hog fuel burners, log and wood waste storage and disposal sites, and railroad and maritime loading facilities. In 1996, AGRA Earth and Environmental, Inc. (AGRA), identified various corporations in the vicinity with operations that could have resulted in releases of contaminants in the vicinity of the Property. These corporations included BNSF, Chevron, KC, Scott Paper Company, and Texaco Refining and Marketing, Inc. (Texaco). Historical features and operations of properties that surround the Property are shown on Figures 2-3 through 2-6. A brief summary of operations and activities at the properties is presented in Sections 2.2.2.1 through 2.2.2.4.

2.2.2.1 North, northeast, and northwest

The 1930 Great Northern Railway real estate map (Appendix A) shows that the southern portion of the former KC property was occupied by the Associated Oil Company (predecessor to Texaco) and Standard. Two railroad spurs located east of the Property and extending north are labeled "Associated Oil Co." and "General Petroleum Corp" on the map. Three small oil ASTs were then located at the eastern boundary of the Standard property adjacent to a railroad spur labeled "Standard Oil Co." (Figure 2-6).

In a 1947 aerial photograph, four small and two large ASTs are evident on the Associated Oil Company property approximately 400 feet north of the ADC Parcel, and three small ASTs remained next to the railroad spur on the Standard property (Figures 2-3 and 2-6). An industrial facility is evident on the photo farther north, beyond the Associated Oil Company property. This facility is the former paper mill, which operated originally as Puget Sound Pulp & Timber Company, later as Soundview Pulp Company, and eventually as Scott Paper Company in 1951.

Four small ASTs are evident half-way between the Associated Oil Company tank farm and the General Petroleum tank farm on a 1955 aerial photograph (Appendix A and Figure 2-6). Standard issued a quit claim for the Standard parcel to Scott Paper Company in 1958. In 1963, Standard sold its remaining property to Scott Paper Company.

Two additional large fuel oil ASTs are visible on the Associated Oil Company property in the 1967 aerial photograph (Figure 2-4), bringing the total number of ASTs on that property to eight. The four small fuel oil ASTs located just south of Associated Oil Company's fuel farm are still present on the 1967 aerial photograph. By that time, KC's warehouse had been built, and the footprint covered the location of the three former Standard ASTs (Figures 2-4 and 2-6).

Five ASTs on the Associated Oil Company fuel farm, and the KC building expanded to its current configuration, are shown in a 1976 aerial photograph (Appendix A). In addition, two large ASTs located northeast of the Associated Oil Company fuel farm and north of the KC warehouse appear on the 1976 aerial photograph. After purchasing the property from Chevron and successors to the Associated Oil Company, KC continued to use the former Associated Oil Company ASTs on the north side of the warehouse building to store bunker fuel for its boilers, and at least two of these tanks remained in place until 1997 (AECOM, 2011; Aspect, 2013a). According to the Polk City directories, "Scott Paper Co." was listed as occupying the area to the north from 1958 to 1995. KC acquired Scott Paper Company in 1995, and KC was listed as the owner of this property from 1995 until the property was acquired by the Port of Everett in November 2019.

Two of the Associated Oil Company ASTs, the two ASTs associated with the KC mill, and the southern portion of the active mill are visible in the 1993 aerial photograph (Figure 2-5). The KC warehouse is also visible in the 1993 photograph. A reconnaissance of the Property and vicinity conducted in 1996 (AGRA, 1996a) indicated that one of the larger ASTs in the former Standard fuel farm was labeled as containing #3 Fuel Oil, and one of the smaller ASTs was labeled "caustic." One of the ASTs just north of the KC warehouse was reported to have contained diesel fuel or fuel oil (Ecology, 2013a). The other tank is labeled TREX on recent reports (Aspect, 2013a,b), but was not identified as a recognized or potential environmental concern in a Phase I Environmental Site Assessment prepared in 2011 (AECOM, 2011).

The former KC paper mill and the former ASTs visible in the historical aerial photographs were demolished in 2012–2013, although the warehouse building has been left intact (Aspect 2013a). Extensive contamination of soil and groundwater has been documented at the former KC property. The Port of Everett purchased the former KC property in 2019 and is actively engaged in a cleanup process (Aspect, 2013a) (see Section 3.2.1).

2.2.2.2 South

In the late 1980s to early 1990s, Mr. Jack Johnston (part-owner of Johnston Petroleum) purchased the property immediately south of the current City of Everett right-of-way (just south of the ExxonMobil Parcel) from BNSF. At the time of the purchase, the Johnston parcel and ExxonMobil Parcel were adjoining. The Johnston property has been used for parking vehicles, storing packaged goods and oils, and receiving containers (e.g., 55-gallon drums) to be shipped to a recycling facility. Ownership of the former BNSF parcel passed to the Johnston Estate. In 2003, the southernmost portion of the ExxonMobil Parcel was severed and transferred to the City of Everett via a Consent Decree of Appropriation (No. 01-2-03480-2) as part of the Terminal Avenue Overpass project. Construction of the Terminal Avenue Overpass ramp was completed in 2003. The overpass crosses the Johnston Estate parcel and the southeast corner of the ExxonMobil Parcel.

2.2.2.3 West

As of 1915, the pre-development shoreline for Port Gardner Bay was located approximately along the present Federal Avenue (Appendix A). Over time, the shoreline was extended westward by filling the bay. A small warehouse is apparent across Federal Avenue from the Property and between 26th Street and California Street on the 1930 Great Northern Railway real estate map, and on aerial photographs through at least 1967 (Figures 2-3, 2-4, and 2-6; Appendix A). This warehouse was located directly on the waterfront of Port Gardner Bay as recently as 1967 (Figure 2-4). By 1947, the shoreline extended 100 to 200 feet west of the Property. A service garage for ADC was built along the 1947 shoreline, which was armored by a bulkhead, as seen in historical photographs. By 1967, additional dredge infilling had occurred immediately to the west of the former KC property, where the eastern portion of the current Dunlop Towing parcel is located. Between 1967 and 1976, a much larger portion of Port Gardner Bay was filled in, resulting in the current sheet-pile bulkhead shoreline. The properties west of Federal Avenue belong to the Port of Everett and have been leased to various third parties, including ADC, for industrial use as the shoreline was extended westward over time.

According to Sanborn maps and a lease document, ADC leased the warehouse building from Great Northern Railway from 1937 until 1971. General Petroleum (predecessor of ExxonMobil) subleased the building from ADC between 1951 and 1971. General Petroleum and ADC stored oil, grease, and trucks in the warehouse and oil in steel drums adjacent to the warehouse. A wash rack and boiler room were located in the southern end of the building, as shown on the 1957 Sanborn map (Appendix A). Based on historical aerial photographs, the warehouse was removed sometime prior to 1976. In addition, a fuel pier extending westward into Port Gardner Bay was present adjacent to the warehouse from at least 1947 through 1967. The pier was leased by ADC and subleased to General Petroleum.

In 1973, the shoreline west of the Property was infilled to its current configuration by the Port of Everett. The 1976 aerial photograph shows the area used for log storage. The Port of Everett formerly leased the property west of Federal Avenue to Vigor Marine LLC (Vigor Marine). Vigor Marine used this property for ship repair and as a storage yard. Office trailers and a warehouse are also located on that property. The Port currently leases land northwest of the Property to Dunlap Towing, who operates a fleet of marine tugs and transports. Additional discussion of the progression of development and alteration of the shoreline adjacent to the Property is presented as part of the CSM in Section 8.

2.2.2.4 East

An alley belonging to the City of Everett as a right-of-way lies immediately to the east of the Property. This alley separates the Property from a larger parcel owned by BNSF and the active rail line farther to the east. Based on historic Sanborn maps and other historical maps and photographs, the rail line has existed at that location and appears to have been actively used since at least 1902 (Appendix A). According to the 1930 Great Northern Railway real estate map and Sanborn maps, the property directly east of the City of Everett right-of-way has belonged to BNSF since 1930.

Photographs and building plans showed a spur track to the east of the Property that appears to have been associated with a petroleum-loading rack that was used to pump oil into railroad tank cars. The 1930 Great Northern Railway map shows underground fuel lines running from the Property to the loading rack. Although no specific records were found documenting that these lines were decommissioned, the ADC Property owner believes all the piping was removed. The area appears to be unpaved with low-lying vegetation in the 1947 aerial photograph (Figure 2-3). The same area appears on historical aerial photographs to have been used predominantly as an open parking lot in 1947, 1955, 1967, 1985, and 1993 (Figures 2-3 through 2-5 and Appendix A). According to the City of Everett Tax Assessor records, the property to the east belongs to BNSF; this property was most recently used by KC as parking and storage prior to mill closure.

2.3 ANTICIPATED FUTURE PROPERTY USE AND SITE **OPERATIONS**

The Property and the immediately surrounding properties are zoned M-2 Heavy Manufacturing land use by the City of Everett (2017a). The City's comprehensive plan shows the Property and the same surrounding properties as E.5.1 Heavy Industrial land use (City of Everett, 2017b). The current owners of the Property have no plans to

sell or transfer the Property. The Property is currently used for industrial purposes and foreseeable future use is heavy industrial/or commercial.

The City of Everett has modified the M-2 zoning in Ordinance No. 3312-13 (effective January 25, 2013) by allowing some uses that could qualify as commercial uses in the Central Waterfront Planning Area, which includes the Property (City of Everett, 2013) and the nearby properties. In Table 5.2 of the ordinance, titled "Non Residential Uses," the M-2 zoning is modified to allow a mix of commercial and industrial uses. The allowed land uses specifically prohibit residential use and use for daycare facilities. Use of the area for parks is allowed. The City of Everett Comprehensive plan was updated in November 2020 and establishes that the Site will remain zoned for commercial and industrial uses through 2035; no changes to the Site's zoning are planned or anticipated after 2035. In addition, the owners of the Property anticipate that institutional controls will be put in place that will limit use of the Property to industrial/commercial purposes and potentially require implementation of passive or active vapor intrusion measures in the event that redevelopment in the future requires installation of utilities or new structures.

2.4 ENVIRONMENTAL SETTING

This section presents a summary of general environmental conditions for the Property and the immediate vicinity. The Property is located in the southwest quarter of Section 19, Township 29 North, Range 5 East, Willamette Meridian. The nearest surface water is an inlet from Port Gardner Bay at Dunlap Towing, located approximately 300 feet northwest of the Property.

2.4.1 TOPOGRAPHY

The topography of the Property and immediate vicinity is relatively flat, with an elevation of approximately 12 to 15 feet relative to the North American Vertical Datum of 1988 (NAVD88). The area slopes gently to the west toward Port Gardner Bay. Higher elevations, up to 150 feet, exist to the east of the Property. The surrounding area consists of roadways and industrial buildings surrounded by parking and storage areas.

2.4.2 GEOLOGY AND HYDROGEOLOGY

Extensive explorations have been conducted on the Property and in the nearby vicinity to characterize subsurface conditions. These explorations have included soil borings, monitoring wells, test pits, and limited subsurface excavations. Locations of historical exploration points installed through August 2019 are presented on Figure 2-7. Lithologic logs collected from these explorations are compiled in Appendix B. These logs were used to construct representative stratigraphic cross sections of the Property and immediate vicinity. The locations of these cross sections (labeled A-A' through E-E') are illustrated on Figure 2-7, and the cross sections are presented on Figures 2-8 through 2-13. An investigation of soils on the Port of Everett property was performed by Cardno in 2020 and 2021 (Cardno 2021), as discussed in Section 3.2.4. Cardno's (2021) explorations are not reflected on Figures 2-7 through 2-13 or the exploration logs in Appendix B.

Based on the 1914 Sanborn map, the Site consisted of low-lying mudflats shown as marshy areas, and the areas near these marshy areas were used by settlers for small residences and dwellings. The marshy areas were likely developed on top of the native near-surface geologic deposits. Settlers likely used the marsh for waste disposal. Near-surface geology in the area surrounding the Property is characterized by Vashon advance outwash deposits (Qva) and transitional beds (Qtb) (Minard, 1985). The outwash deposits are primarily granular and represent higher energy deposits that were deposited ahead of the Vashon glacier as the glacier melted. The transitional beds are composed of interbedded clayey, silty fine to medium sand, and the marsh was developed on top of these beds, so it is difficult to distinguish between fill and marsh deposits. The peat deposits noted in the cross sections likely represent the former marsh. The transitional beds are older than the advance outwash deposits and are the primary geologic unit mapped on the Property (Minard, 1985). The contact between the marsh deposits and the transitional beds occurs between 12 and 27 feet below ground surface (bgs).

Based on subsurface investigations conducted at the Property and surrounding vicinity, the near-surface soils at the Property consist of a heterogeneous mixture of fill materials. The fill materials consist of very loose to

medium dense, brown, brownish gray, and gray silty sand and sand with areas of wood and brick debris extending to depths of approximately 5 to 10 feet bgs (corresponding to approximately 5 to 15 feet NAVD88).

The shoreline was gradually extended to the west as the Bay was infilled with sands and silty sands west of the Property and Federal Avenue. Among these typical shoreline silts and sands, significant quantities of organic substances are documented to be present, including wood waste and peat. The high organic content of native soil and fill materials present on the Property and in the immediate vicinity reduces mobility of the weathered petroleum hydrocarbons remaining in the subsurface from historic releases of diesel. Additional discussion concerning the fill history of the Site is presented in Sections 2.2.2 and 8.1.

Gray silty sand and silt and dark-brown to black peat mixed with wood debris are encountered beneath the shallow fill and extend up to 20 to 27 feet bgs. The transitional beds are dense, moist, brown, medium sand with various amounts of silt and discontinuous stiff, brown, organic-rich, clayey silt with some fine sand. The transitional beds were mapped at the land surface to the east of the Site.

Shallow unconfined groundwater occurs at the Site near the surface to 12 feet bgs, with shallower groundwater on the east side of the Site near the Terminal Avenue Overpass and deeper groundwater near the current shoreline. Groundwater is frequently observed to discharge from the base of the overpass and to the surface at the northeast corner of the Site on the former KC property near the former Everett Avenue.

Contour maps based on groundwater elevations measured during semiannual monitoring events are shown on Figure 2-14 for February 2016 and on Figure 2-15 for August 2016. Groundwater levels vary seasonally by approximately 2-3 feet. The groundwater elevation contour maps show the 25-hour mean groundwater level calculated from continuous water levels recorded by transducers in February and August 2016. Based on the groundwater elevation data shown on Figures 2-14 and 2-15, groundwater beneath the Property flows generally toward the west and northwest. Groundwater wells located closer to the current shoreline show larger response to tidal variations. Wells MW-A1, MW-A2, and MW-A3 showed the greatest tidal response of 1.1 feet, compared to an 8- to 9-foot tidal range in surface water of Port Gardner Bay measured at the Everett Pier.

2.4.3 SURFACE WATER HYDROLOGY

Because the Property and surrounding area are paved, surface water drainage is controlled largely by surface topography and engineered drainage structures. Surface water runoff at the Property follows existing topography. Stormwater generally flows to the west and northwest, following the surface slope, toward catch basins located on the Property and on Federal Avenue directly west of the Property. Storm sewers serving the Property and vicinity discharge to Port Gardner Bay via the storm sewer discharge located near the northwest corner of the Port of Everett property leased by Dunlap Towing.

The locations of known storm drains and catch basins are shown on Figure 2-16, based on a survey conducted in 2010 by TrueNorth Land Surveying, Inc. (Appendix C). Four catch basins are located on the Property, approximately 70 feet east of the western Property boundary. These catch basins are located in a linear group oriented north-south. The catch basins on the Property are connected via underground conveyances (AMEC Earth & Environmental, 2007) and discharge via a lateral that extends toward Federal Avenue.

Additional catch basins are present along Federal Avenue farther west, but it is unknown if the storm drains are interconnected.

Some surface water may flow north from the Property toward the former KC property and south from the Property to the City of Everett parcel. Surface water may also flow onto the Property from the BNSF property.

The combined stormwater and sanitary sewer line services the area. Sewage is pumped to and treated at the City of Everett sewage treatment plant except during periods of heavy rainfall, when overflow is routed directly to Port Gardner Bay.

2.4.4 METEOROLOGY

Everett has a moderate climate usually classified as Marine West Coast, typified by wet, cool winters and relatively dry, warm summers. Temperature extremes are moderated by proximity to the adjacent Puget Sound and the greater Pacific Ocean. The region lies in a partial rain shadow, partially protected from Pacific storms by the Olympic Mountains, and from Arctic air by the Cascade Range.

The Western Regional Climate Center provides a summary of climatological statistics for Everett Junior College, located approximately 0.6 mile from the Property (WRCC, 2013). The average annual temperature measured at Everett Junior College is 50.6 degrees Fahrenheit (°F). Average monthly temperature varies from about 39°F in January to about 63°F in July and August. Winters are cool and wet with average lows around 35°F on winter nights. Colder weather can occur, but seldom lasts more than a few days. Summers are dry and warm, with average daytime high temperatures around 73°F in July and August. Hotter weather usually occurs only during a few summer days. The hottest official recorded temperature was 98°F on June 9, 1955; the coldest recorded temperature was 1°F on January 18, 1955 (WRCC, 2013).

Total annual precipitation is about 35.7 inches, with about two-thirds of the rainfall occurring during the wet season from October through March. Monthly average rainfall varies from a maximum of 4.96 inches in December to 1.04 inch in July. Most of the precipitation falls as drizzle or light rain, with only occasional downpours (WRCC, 2013). The 10-year and 100-year recurrence interval, 24-hour precipitation events are approximately 2.25 inches and 3.25 inches, respectively (Miller et al., 1973).

2.4.5 ECOLOGICAL SETTING

The Property is located near the marine shoreline in the Snohomish River basin, in Washington Water Resources Inventory Area 7 (Ecology 2013b), in an area zoned for heavy industrial development (City of Everett, 2017a). The entire Property is paved, and no wetlands, streams, shorelines, floodplains, or functional wildlife habitat occur on the Property. Nearby environmentally sensitive areas include Port Gardner Bay and the Snohomish River.

Port Gardner Bay is located 300 feet west of the Property, immediately adjacent to the Port of Everett property, and contains the nearest wildlife area. Port Gardner Bay is classified as Dungeness crab (*Cancer magister*) habitat, according to the City of Everett Fish and Wildlife Habitat Conservation Areas Critical Areas Map (City of Everett, 2006). However, the shoreline near the Site consists largely of deepwater and limited subtidal and intertidal habitat that has been heavily modified by dredging, filling, and shoreline development (City of Everett, 2002).

Species listed under the Endangered Species Act (ESA) and Washington State Priority Species may be present in Port Gardner Bay and adjacent marine waters of Puget Sound. ESA-listed species present in Port Gardner Bay may include Chinook salmon (*Oncorhynchus tshawytscha*), bull trout (*Salvelinus confluentus*), coho salmon (*O. kisutch*), and steelhead (*O. mykiss*). Adult salmonid use of the area is limited to migration and possibly physiological transition. Juvenile use of the area is similar but may also include feeding/rearing and refuge from predation (City of Everett, 2002).

Common invertebrates present in Port Gardner Bay include snails (*Littorina* spp.), mussels (*Mytilus cf. edulis*), clams (*Macoma balthica, Macoma* spp., *Cryptomya* spp.), cockles (*Clinocardium* sp.), jingle shells (*Pododesmus macroschisma*), polychaetes (*Nereis* spp., *Notomastus* spp., *Nephtys* spp., *Glycera* spp.), barnacles (*Balanus glandula*), shore crabs (*Hemigrapsus* spp.), isopods (*Gnorimosphaeroma oregonesis*), ghost shrimp (*Callianassa* sp.), blue mud shrimp (*Upogebia pugettensis*), Dungeness crab (*Cancer magister*), red crab (*C. productus*), and anemones (*Mertridium senile*) (City of Everett, 2002).

Water quality in Port Gardner Bay meets Washington State water quality requirements for all parameters and is not listed on Ecology's 303d list of impaired waters (Ecology, 2014).

The Snohomish River is situated east and north of the Property, approximately 1.5 miles away. The East Waterway channel of the Snohomish River Estuary bends southward and empties into Port Gardner Bay adjacent to the Everett Naval Station. The East Waterway has been dredged and filled for development of deepwater port facilities. The Snohomish River and its estuary are separated from the Property by areas of industrial and other development, including the City of Everett's Central Business District, residential and commercial development, and areas of industrial and maritime services along the Snohomish River and East Waterway shoreline.

As noted previously, no wetlands, streams, shorelines, floodplains, or functional wildlife habitat occur on the Property or within the immediate vicinity (NWI, 2014; City of Everett, 2006 and 2012). Vegetation in the vicinity of the Property is sparse and generally limited to maintained landscaping, including ornamental shrubs and trees. The nearest stream habitat is Pigeon Creek #1 and its associated wetlands, located approximately 1 mile southwest of the Property.

2.4.6 TIDAL INFLUENCE

Studies to assess the influence of tidal cycles on groundwater flow were conducted at the Property by RZA AGRA in 1991 (as reported by Exponent, 1998) and by AMEC Earth & Environmental in 2008 (AMEC Earth & Environmental, 2008), February 2011 (AMEC Earth & Environmental, 2011a), and 2014.

As reported by Exponent (1998), AGRA monitored water levels in selected monitoring wells for a 48-hour period to measure recovery after a 24-hour aquifer test and to assess potential tidal influences in shallow groundwater. During the 48-hour period, no clear evidence of tidal fluctuations was noted. Based on the results of the recovery monitoring, the observed hydraulic gradient at the Property, and the distance from Port Gardner Bay, it was concluded that tidal influences on shallow groundwater at the Property would be expected to be negligible (Exponent, 1998).

In 2014, a set of seven transducer/loggers were installed in seven wells both on and downgradient of the Property. Results of the 2014 tidal study were consistent with the results from the earlier tidal study conducted in 2011 (AMEC Earth & Environmental, 2011a). Figures 2-17 through 2-20 show hydrographs of water levels in these seven wells measured from July 25, 2014, through September 29, 2014. Transducer readings for these wells have been corrected for barometric pressure readings, which were collected simultaneously, to yield water levels. The hydrographs show the actual water levels and the 25-hour moving average water level for each of the wells. The 25-hour moving average water level filters the daily tidal fluctuations to facilitate evaluation of mean groundwater levels and to evaluate groundwater flow directions (Serfes, 1991). The hourly precipitation records from Paine Field in Everett are also plotted on the hydrographs.

Groundwater levels at the Site are influenced by the tidal fluctuations in Port Gardner Bay. In areas where groundwater levels are influenced by tidal fluctuations, manual water level measurements can lead to under- or overestimates of the hydraulic gradients, with steeper gradients at low tides and flat or slightly reversed hydraulic gradients at high tide. In areas with tidally influenced groundwater, like the Site, the overall groundwater flow directions are determined by the mean hydraulic gradient (Serfes, 1991). The 25-hour average water level for each of the wells can be used to determine the mean or average groundwater flow direction and hydraulic gradient. The 25-hour average water level dampens or filters the tidal "signal" (Serfes, 1991). It should be noted that the amount of flow reversal during a given tidal cycle is minimal, since the peak high tides only last for approximately one hour before ebbing. Any mixing due to flow reversal would affect only the portion of the aquifer present near the shoreline.

There are two high and low tides in a day, and a complete tidal cycle takes 25 hours to complete. Of the two high tides in a cycle, one is generally higher than the other. In order to conservatively calculate the degree of mixing during the highest portion of the tidal cycle, Amec Foster Wheeler Environment & Infrastructure, Inc., (Amec Foster Wheeler) reviewed the tidal records for June 2016 (the highest and lowest tides of any year occur near the summer and winter solstices). The highest tide in June 2016 occurred on June 6, 2016, at 7:53 PM, with a height of 12.3 feet above mean lower low water (MLLW). Groundwater monitoring wells MW-A3, MW A4, and MW-A5 are all equipped with self-logging transducers that record water levels every 15 minutes. After correcting the measured water levels for barometric pressure, Amec Foster Wheeler calculated the tidal flux using the following steps:

- The mean water level for the 12.5-hour period prior to and after the highest high tide was determined using the vertical datum of NGVD88.
- The highest high tide water level of 12.3 feet MLLW was converted from MLLW to the NGVD88 datum by subtracting 1.8 feet, yielding a high-water elevation of 10.5 feet NGVD88.
- The groundwater seepage velocity equation $S_v = Ki/n_e$ (Fetter, 1994) was used to calculate tidal flux, where:
 - S_v is the seepage velocity in inches/hour;
 - *K* = the hydraulic conductivity of the aquifer materials expressed in inches/hour;
 - *i* = the hydraulic gradient (dimensionless); and
 - n_e = effective porosity

- The hydraulic conductivities used were determined by slug tests conducted in MW-A5 and MW-A6 (see Section 7.1).
- The hydraulic gradient was determined by dividing the difference between the highest high-water elevation and the 25-hour mean water level in MW-A3, MW-A4, and MW-A5 by the distance to Port Gardner Bay from each well.
- The effective porosity is the void space available for groundwater flow, and a value of 0.30 is typical for sands that comprise the aquifer material.

Assuming the highest high tide level was held constant for 6.25 hours, we calculated the distance the tidal flux would travel inland would range from approximately 0.17 to 0.56 feet. A copy of this calculation and the associated tidal graph and schematic cross-section are included in Appendix D. This estimate of the maximum tidal flux is very conservative and shows that the tidal exchange of surface water and groundwater is limited to the immediate vicinity of the shoreline.

Two of the seven wells (MW-40R and RW-2) are located on the Property and show a very minimal response (<0.05 foot) to tidal variations, but a strong response to infiltration of precipitation. The hydrographs for these two wells resemble one another, suggesting they are responding to the same influx of precipitation. After a spike in water levels caused by a rain event, groundwater levels gradually decrease until the next precipitation event.

Wells MW-A1, MW-A2, MW-A3, and MW-A5 respond in a limited way to infiltration of precipitation, with MW-A1 and MW-A5 showing the greatest precipitation response. Well MW-A3 shows very little response to precipitation. These same wells show tidal variations or "signals" ranging from 0.3 foot to 0.9 foot, with MW-A3 showing the strongest tidal signal, and MW-A1 the smallest tidal signal.

MW-A4 has a very minor response to the tides, and the mean water level in the well appears to vary in response to barometric pressure (Figure 2-21), with the general rise in water levels likely due to infiltration. Field observations indicate that MW-A4 has microbial growth on the surface of the water that coats the surface of the water level meter tape. The well log reports silty sands with wood noted at 15 and 20 feet bgs; at 20 feet bgs the sand becomes poorly graded with marine shells. It is not known why this well has a limited tidal response.

2.4.7 HISTORIC AND CULTURAL RESOURCES

Records were researched at the State of Washington Department of Archaeology and Historic Preservation in Olympia and at the Everett Public Library's Northwest History Room to identify potential historic or cultural resources in the immediate vicinity of the Site. There are no previously documented historic properties (e.g., archaeological sites or isolated finds, historic buildings/structures/objects, and traditional cultural properties) either listed or eligible for listing in the National Register of Historic Places located on the Property. One precontact isolate find (45SN629) was recently recorded on the KC parcel located immediately north of the Property (Undem, 2013). The isolate was discovered during archaeological monitoring for the KC Upland Area Project (No. 110207-004-01). The archaeological monitoring was needed for the upland area project based on the findings presented in an Archaeological Resources Assessment that was completed in 2013 by SWCA Environmental Consultants (SWCA, 2013a).

The Archaeological Resources Assessment categorized the former KC property upland area based on sensitivity for unknown and significant archaeological materials. Upland areas classified with a high sensitivity for buried cultural resources were addressed in a monitoring and discovery plan for use during interim remedial measures ("opportunistic cleanup") to be implemented as part of demolition activities on the former KC parcel (SWCA, 2013b). During implementation of the remedial action, one pre-contact lithic artifact, an edge-altered cobble (45SN629), was recorded (Undem, 2013; Aspect, 2015). The Archaeological Resources Assessment was based on geomorphological and historical analyses of the Port Gardner Bay nearshore environment. This analysis is relevant to the Property, as the feasibility study (FS) addressed in this report includes the same subtidal delta deposits (low sensitivity); marsh and foreshore environment (moderate sensitivity); and beach, backshore, and upland areas (high sensitivity) addressed in the KC report.

Three historic property inventory forms are on file with the Washington State Department of Archaeology and Historic Preservation for buildings located on the former KC parcel. These buildings were formerly associated with the Puget Sound Pulp and Timber Mill that dates back to 1929 (Sharley, 2012; Artifacts, Inc., 2011;

Ravetz, 2005). No historic buildings, structures, or objects that require historic property inventory documentation are present on the Property.

Although no specific traditional cultural properties have been identified within the project area, the Everett waterfront in general has a long history of tribal use. A brief summary of tribal use associated with the Everett waterfront along with tribal engagement activities that have taken place was provided by Ecology and is set forth below.

Ecology is working with landowners/stakeholders, including local Native American tribes, to clean up contaminated sites and sediments in the vicinity of Port Gardner Bay and the Snohomish River Estuary. Port Gardner Bay is identified as a high-priority, "early-action" cleanup area under the Puget Sound Initiative (PSI). The Site has been identified as a cleanup site under the PSI. Local tribes that have been actively engaged by Ecology under the PSI at Port Gardner include the Tulalip, Suquamish, Swinomish, and Lummi. Ecology has worked with a tribal liaison to assist in developing contacts and early engagement activities with cultural and natural resource sections within each of the aforementioned tribes. Engagement with the tribes has consisted of meetings to discuss PSI cleanup sites and cultural resources, providing the tribes with draft work products for comment, and a monthly update summarizing the current status of each PSI site, near-term work products to be submitted for tribal review, project schedules, and a summary of tribal engagement activities for the Port Gardner PSI Sites.

Based on information obtained from Ecology's discussions with the tribes and information provided in a 1973 Shoreline Historical Survey Report (Dilgard and Riddle, 1973), people have inhabited the Port Gardner Bay area for thousands of years. For centuries, the northwest point of the peninsula (i.e., Preston Point) was the location of Hebolb, the principal village of the Snohomish tribe. Its location near the mouth off the Snohomish River and next to Port Gardner Bay provided both abundant food and access to transportation routes. Native tribes used the Everett shoreline in part for subsistence activities, such as shellfish collection, hunting, plant gathering, and fishing. According to local tribes, native long houses were located up and down the Everett waterfront. Local tribes have communicated to Ecology that the Everett waterfront is a culturally sensitive area. Due to the cultural sensitivity of the project area and the potential to encounter cultural artifacts during cleanup activities, the cleanup action will include a monitoring and unanticipated cultural resources discovery plan outlining procedures to be used in the event cultural resources are encountered during remediation activities on the Property. The monitoring plan will address cleanup activities conducted in project areas that have a high sensitivity classification for cultural resources.

Historic maps and aerial photographs of the project area also were consulted. Sanborn Fire Insurance maps from the early part of the 20th century depict an emerging industrial area with a few wooden and temporary dwellings lining the historic shoreline of Port Gardner Bay. A 1946 plot plan of the former ADC facility shows the toe-of-slope of a former garbage dump on the property as of February 15, 1917 (Section 2.2.1). Extensive background research failed to identify any further evidence to suggest the Property was used as a formal dump/sanitary landfill accepting municipal refuse or trash from a wider geography. The BNSF excavation in 2011 encountered vintage bottles, old shoes, and lumber that were likely disposed in the old marsh area noted in the 1914 Sanborn map. Future cleanup planning will need to address cultural resources that may be encountered in this area. A building or artifact must generally be a minimum of 50 years old to be considered historically significant; however, not all objects more than 50 years old are considered significant cultural resources.

2.4.8 UTILITIES

Underground utilities in the vicinity of the Property are shown on Figure 2-16. Stormwater drainage lines are present beneath the Property. Underground stormwater, sanitary sewer, water, and telephone lines run beneath Federal Avenue and the adjoining former KC property. The City of Everett's new 24-inch underground force main also runs beneath Federal Avenue and the former KC property. An overhead power line runs along Federal Avenue and the former KC property.

Any contractor conducting subsurface work at the Site must independently identify underground utilities prior to conducting the subsurface work.

2.5 REGULATORY AND COMPLIANCE HISTORY

Petroleum contamination has been found in soil and groundwater beneath the Site, as described in detail in Section 3 of this report. This contamination is the result of historic releases from the bulk petroleum facilities that operated on the Property and adjacent properties to the west (Port of Everett), north (Everett Avenue right-of-way and adjacent to the KC warehouse), and east (BNSF property and in the vicinity of the former loading racks). Due to the presence of petroleum contamination, the Site is subject to cleanup under the terms of the MTCA regulations (WAC 173-340). Cleanup activities and Site investigations have been conducted at the Site since the mid-1980s, and include several AOs issued under MTCA that direct cleanup actions.

In 1996, Mobil and ADC entered into AO No. DE-95TC-N402 (1996 Order) with Ecology to take necessary steps to clean up, eliminate, and/or contain petroleum releases at and near the City of Everett combined sewer overflow (CSO) discharge line and/or diffuser into Port Gardner Bay. The 1996 Order also required pilot testing of petroleum recovery technologies; characterization of the nature of contamination in the vicinity of the CSO line; and repair of the CSO line. In response to the 1996 Order, interim remedial actions were undertaken, and studies performed at the Site demonstrated that the exposure pathway to Port Gardner Bay had been removed through repair and replacement of portions of the CSO line that also included slip-lining of the sewer. Approximately 23,000 gallons of petroleum was recovered within the vicinity of the CSO line by various interim remedial measures. Section 4 presents a more detailed discussion of interim remedial measures implemented at the Site.

In December 1996, Ecology issued notice of potential liability letters to KC, Texaco, BNSF, Scott Paper Company, and Chevron. The letters stated that credible evidence of releases of hazardous substances from the properties owned or operated by each of these companies existed.

In 1998, Mobil and ADC entered into a new AO (the 1998 Order) with Ecology to complete a remedial investigation (RI) and FFS. RAOs were developed and approved by Ecology using existing analytical data, agreed-upon exposure pathway analyses, and a screening-level risk assessment. The cleanup approach selected to achieve RAOs included a liquid-phase petroleum hydrocarbons (LPH) interceptor trench along the western and northern boundaries of the Property and a low-permeability cap over the Property. The interceptor trench and cap were installed in 1999 (Section 4.6).

Periodic groundwater monitoring began at the Site in the early 1990s. Regular quarterly groundwater monitoring and monthly LPH gauging and removal commenced in 2002, as a requirement under the 1998 Order and in accordance with a monitoring program that was prepared by Premier Environmental Services, LLC (Premier, 2002) and submitted to Ecology.

In 2007, the groundwater monitoring frequency for the Site was reduced from quarterly to semiannually. This change in monitoring frequency was verbally accepted by Ecology in February 2007, and acceptance was again confirmed in a meeting with Ecology on August 8, 2007.

In 2010, Ecology, ADC, and ExxonMobil entered into a third AO, the 2010 Order. The 2010 Order specifies that an FFS and DCAP be prepared to identify the nature and extent of Site soil and groundwater contamination in order to select a preferred final cleanup action to address contamination in soil and groundwater at the Site in compliance with requirements under MTCA.

A draft FFS Work Plan was prepared and submitted to Ecology in February 2010, which identified further investigations needed to complete the FFS (AMEC Earth & Environmental, 2010a) (Section 3.1.1). Additional field sampling and analysis were conducted in June 2010 through February 2011 to fill these data gaps, and the results were reported to Ecology in April 2011 (AMEC Earth & Environmental, 2011b) (Section 3.1.2).

ExxonMobil/ADC conducted several investigations and implemented interim measures in 2010–2011 to assist the City of Everett during the installation of a new 24-inch force main along Federal Avenue and former Everett Avenue. In June 2010, AMEC Earth & Environmental decommissioned pipelines and removed areas of affected soil to the west of the Property to prepare for the force main installation (Section 4.9) (AMEC Earth & Environmental, 2011d). AMEC also conducted two rounds of soil sampling at various depths to characterize soils that were to be excavated as part of the force main installation for disposal purposes (AMEC, 2014a) (Section 3.1.3).

In 2011, seeps of LPH were observed from a section of the roadway on former Everett Avenue, and an exploratory test pit advanced at the location of one of the seeps confirmed the presence of LPH below the asphalt. An interim

action was conducted from December 2011 to April 2012 to excavate and dispose of surface asphalt, affected soil, and recovered LPH and groundwater from the ExxonMobil/ADC, BNSF, and former KC properties that were contributing to these seeps (Section 4.10) (AMEC, 2012a). This interim action was undertaken independently by ExxonMobil/ADC and was not conducted under the 2010 Order. Ecology was notified in advance about the work and observed performance of the work on several occasions.

The information obtained while conducting the interim action indicated that the CSM presented in the 2011 Data Gaps Investigation Report (AMEC Earth & Environmental, 2011b) was incomplete. These observations indicated that further information was needed to refine the CSM and guide the development and evaluation of remedial measure alternatives in the SC/FFS report. Additional subsurface investigations were conducted at the Site during October–November 2013 and February 2014 to address remaining data gaps both on the Property and on separate properties adjacent to the Property. The investigations were conducted based on the final Data Investigation Work Plan (AMEC, 2013), and the results were reported to Ecology in April 2014 (AMEC, 2014a) (Section 3.1.7).

This SC/FFS report will serve as the basis for development of the DCAP, which will outline the final corrective measures for the Site, as specified in the 2010 Order.

3 PREVIOUS ENVIRONMENTAL CHARACTERIZATION/SAMPLING INVESTIGATIONS

Extensive characterization and sampling activities have been conducted at the Site since 1985. These investigations included drilling soil borings, installation of monitoring wells, excavation of test pits, and collection and analytical testing of soil and groundwater samples. Table 3-1 provides a chronology and brief summary of previous investigations conducted at the Property and vicinity. The FFS Work Plan (AMEC Earth & Environmental, 2010a) presented a detailed description of previous investigations conducted through 2009, which are all included in Table 3-1.

This section presents a brief summary of characterization and sampling work conducted to date and identifies the basis for the discussion of the overall nature and extent of Site contamination presented in Section 6. Figure 2-7 shows the locations of historical explorations conducted to date, and the tables in Appendix E show the historical data used to identify Site COCs. Summaries of investigations conducted since preparation of the FFS Work Plan are presented below. A synthesis of these and earlier investigations in the context of exceedances, locations where residual TPH is present, and contamination depths is presented in Section 6.

3.1 PREVIOUS INVESTIGATIONS FOR THE EXXONMOBIL/ADC SITE

This section summarizes investigation work conducted on the Property since the FFS Work Plan was completed in 2010.

3.1.1 FEBRUARY 2010 FOCUSED FEASIBILITY STUDY WORK PLAN

The FFS Work Plan presented a comprehensive summary of the history of past ownership and operations of the Property and its surroundings (the Site); summarized previous environmental investigations and interim remedial activities; presented a summary of known environmental conditions at the Site; presented a preliminary CSM; and identified remaining data gaps that needed to be filled in order to complete the FFS (AMEC Earth & Environmental, 2010a). The FFS Work Plan included a Sampling and Analysis Plan (SAP) outlining additional field investigations needed to fill those data gaps.

3.1.2 2011 DATA GAPS INVESTIGATION

The FFS Work Plan (AMEC Earth & Environmental, 2010a) identified certain data gaps that needed to be filled in order to complete the FFS. Additional field sampling and analysis were conducted in June 2010 through February 2011 to fill these data gaps, and the results were reported to Ecology in April 2011 (AMEC Earth & Environmental, 2011b). The 2011 Data Gaps Investigation included the following scope of work to fill the gaps:

- sampling and analysis from seven deep borings (AB-1 through AB-7ab) located on- and off-Property to evaluate lithologic conditions, determine if a silt confining layer is present beneath the Site, and test soils at locations where field evidence indicated the presence of petroleum hydrocarbons;
- installation and monitoring of five new groundwater monitoring wells (MW-A3 through MW-A7) to define the limit of dissolved-phase petroleum hydrocarbon contamination;
- sampling and analysis of soil and groundwater samples from five shallow borings (AP-2 through AP-5 and AP-7) on the BNSF parcel to define the vertical and horizontal extent of soil contamination near the former loading racks;

- sampling and analysis of soil and groundwater from one shallow boring (AP-1) to identify potential contamination near the former ADC garage and shop building on the Port of Everett property;
- sampling and analysis of soil and groundwater samples from soil borings and monitoring wells to further
 define the nature and extent of petroleum impacts and to assess geochemical conditions;
- measurement of groundwater levels to assess the groundwater potentiometric surface, surface gradient, and direction of groundwater flow;
- aquifer testing to assess hydraulic conductivity of off-Property soils; and
- a study of groundwater elevations to assess tidal influence on the groundwater flow regime at the Site (Section 3.1.4).

Small amounts of light nonaqueous-phase liquid (LNAPL) were observed in wells W-10R, MW-27, W-1, and MW-15R, while larger amounts were recovered from wells W-2 and MW-29. No continuous silt layer was identified beneath the Property. A plume of groundwater affected by petroleum hydrocarbons was identified to the west and northwest of the Property. Groundwater downgradient from the Property was not affected by volatile organic compounds (VOCs), benzene, carcinogenic polycyclic aromatic hydrocarbons (cPAHs), lead, or total petroleum hydrocarbons (TPH) as gasoline (TPH-G). Monitoring well MW-A3, located southwest of the Property, had a concentration of TPH as diesel (TPH-D) greater than the preliminary screening level only in February 2011. Upgradient monitoring well MW-A7 did not have reportable concentrations of analytes. Spatial patterns in results for geochemical parameters at the Site were consistent with the development of an anaerobic environment in which petroleum biodegradation appears to be actively occurring. Additional details concerning the extent of hydrocarbons at the Site are discussed in Section 3.1.7 and Section 6.3.

As described in detail in the Section 6.5.2 of the Data Gaps Investigation report (AMEC Earth & Environmental, 2011b), the distribution of groundwater geochemical parameters (i.e., oxidation-reduction potential [ORP], dissolved oxygen [DO], dissolved iron and manganese, sulfate, methane, and alkalinity) across the Site supports natural biodegradation of hydrocarbons at the Site. Moving from upgradient well MW-11 (along the eastern border of the Property) downgradient toward Possession Sound, the ORP and DO decrease in concentration, indicating that biodegradation is utilizing oxygen and creating reducing conditions. Dissolved manganese and dissolved iron increase in concentration in the downgradient wells, which is consistent with biological use of these metals as electron acceptors. Sulfate concentrations decrease due to biological reduction to sulfide along the groundwater flow path. Biodegradation of hydrocarbons under anaerobic conditions contributes to the observed increases in methane concentrations along the groundwater flow path. Alkalinity is also observed to increase as groundwater migrates across the Site, due to dissolution of minerals caused by absorption of carbon dioxide generated from biodegradation (AMEC Earth & Environmental, 2011b).

3.1.3 FEBRUARY 2010 CITY OF EVERETT FORCE MAIN SAMPLING

AMEC Earth & Environmental conducted soil sampling and analysis along the planned alignment of the City of Everett's new 24-inch force main to characterize soils along the alignment route for disposal requirements. The investigations were conducted based on (1) a SAP for borings CE-1 thorough CE-5 included as Appendix E to the FFS Work Plan (AMEC Earth & Environmental, 2010a), and (2) a second SAP for borings CE-6 through CE-8, which included decommissioning two monitoring wells on BNSF property and collecting a grab sample (CE-9) during the decommissioning. The analyses from those samples were sent to the City of Everett (AMEC Earth & Environmental, 2011c). Soil samples were collected at several depths from eight borings advanced on Federal Avenue and the former Everett Avenue in the alignment of the planned force main. Samples from selected borings and depths were analyzed for TPH fractions; benzene, toluene, ethylbenzene, and xylenes (BTEX); polycyclic aromatic hydrocarbons (PAHs); VOCs; and selected metals. The analytical results were used by the City to classify soil to be excavated as part of the City's force main project for disposal purposes.

Soil samples were analyzed for the following metals: arsenic, barium, cadmium, chromium, lead, selenium, silver, and mercury. The analytical results are presented in Table 3-2 and compared against the MTCA cleanup levels. MTCA Method A cleanup levels were used for arsenic, cadmium, chromium, lead, and mercury because this value is the most conservative. MTCA Method B cleanup levels associated with direct contact were used for barium, selenium, and silver because MTCA Method A cleanup levels were not available for these analytes, and because the data were used for waste profiling. Soil samples were not analyzed for chromium speciation therefore the

MTCA Method A cleanup level for both trivalent chromium and hexavalent chromium are shown in Table 3-2. The MTCA Method A cleanup level for lead shown in Table 3-2 is the value for unrestricted land use. Detected metal concentrations in all samples were less than respective MTCA Method cleanup levels, except for chromium which exceeded the MTCA Method A cleanup level for hexavalent chromium; note that the chromium speciation is unknown.

3.1.4 2011 TIDAL STUDY

AMEC Earth & Environmental conducted a tidal influence study in February 2011 to determine whether fluctuations in groundwater levels were related to tidal fluctuations and, if so, to evaluate the extent of tidal influences. A stilling well equipped with a transducer was installed on the Everett Pier to automatically record tidal elevations, and pressure transducer/data loggers were installed in monitoring wells W-3, W-6, MW-11, MW-19, MW-28, MW-40R, and MW-A1 through MW-A7 to record groundwater levels every 6 minutes for a period of six days. In addition, a barometer was installed and programmed to collect barometric pressure readings throughout the tidal study period so that water level data collected in the monitoring wells and stilling well could be adjusted for barometric pressure.

Results showed that water levels in monitoring wells W-3, MW-11, MW-A1, MW-A2, MW-A3, MW-A5, and MW-A6 were tidally influenced, with tidal fluctuations ranging from 0.1 foot to 1.1 feet. MW-19, MW-28, MW-40R, and MW-A4 exhibited minimal tidal influence; water levels in these wells were most influenced by changes in barometric pressure. W-6 exhibited minimal response to tidal fluctuations, and water levels in monitoring well MW-A7 changed by less than 0.1 foot throughout the study period. These observations indicate that much of the Site groundwater is influenced by the tides in Port Gardner Bay, especially in areas filled after 1914. This finding indicates that tidal variation needs to be considered when establishing the groundwater gradient.

To evaluate tidal influence on the direction of groundwater flow, the mean groundwater elevation at each monitoring point was estimated using the method described by Serfes (1991). A potentiometric surface map derived from these mean groundwater elevations showed that the mean direction of groundwater flow at the Property on February 10, 2011, was toward the west (Figure 3-1) (AMEC Earth & Environmental, 2011a).

3.1.5 2011 OBSERVATIONS OF SEEPS ALONG FORMER EVERETT AVENUE

On several occasions in 2011, seeps of water with a visible sheen or the presence of LPH were reported along former Everett Avenue. AMEC Earth & Environmental documented the presence of these seeps by recording photographs in the field (Figure 3-2) (AMEC Earth & Environmental, 2011d,e).

3.1.6 2012 OBSERVATIONS DURING CITY OF EVERETT FORCE MAIN REPLACEMENT

AMEC was present on the Site in May 2012 when the City of Everett installed a new 24-inch sanitary sewer force main along Federal Avenue and the former Everett Avenue. Subsurface construction activities included excavation of trenches for the new sewer line and drilling of boreholes used for dewatering activities. AMEC observed excavation and drilling activities and recorded notable subsurface features when relevant, including the presence of LPH if encountered. AMEC documented the presence of LPH in borings and/or trenches along much of the alignment on former Everett Avenue, and at eight locations along Federal Avenue (AMEC, 2012b).

Dewatering for this project began May 15, 2012, and continued for a month. Dewatering progressed from east to west along former Everett Avenue, and then south along Federal Avenue. Dewatering for the project withdrew over 12 million gallons at an approximate rate of 300 gallons per minute. The dewatering lowered the water table along Federal Avenue to 12 feet bgs (a drop of 9–10 feet). The drawdown cone associated with the dewatering likely reached a diameter of 300 to 400 feet around dewatering points, which would have affected most of the Property.

During the 2012 force main replacement project, G-Logics reported material appearing to be LPH flowing into the trench from the northeast at Station 13+00; however, no samples were collected for analysis to confirm this observation. Material appearing to be LPH is often not recoverable and may be immobile due to high content of organic matter in subsurface soils at the Site. The presence of sheens in excavations can be attributed to residually saturated, immobile hydrocarbons in soil that are mobilized temporarily when the soil is disturbed.

3.1.7 2013/2014 DATA GAPS INVESTIGATION REPORT

AMEC conducted field investigations in October–November 2013 and February 2014 to fill data gaps regarding the nature and extent of soil and groundwater contamination in areas of the Site potentially affected by former petroleum releases. The investigation was implemented based on the Data Investigation Work Plan (AMEC, 2013). During these investigations a total of 33 soil borings were drilled on the Property and surrounding properties (Federal Avenue and the BNSF, former KC, Port of Everett, Dunlap Towing, and City of Everett properties). Soil samples were collected and analyzed to delineate areas of affected soil at the Site. Soil samples were analyzed for the following constituents:

- TPH-G;
- TPH-D and TPH as oil (TPH-O) (using silica gel cleanup procedure);
- BTEX and methyl tertiary-butyl ether (MTBE);
- 1,2-dichloroethane, 1,2-dibromoethane, and *n*-hexane (for selected samples based on field observations); and
- low-level PAHs.

In addition, analyses for extractable petroleum hydrocarbons and volatile petroleum hydrocarbons were conducted on selected soil samples with higher concentrations of petroleum hydrocarbons and benzene.

One of the borings was completed as a new monitoring well (MW-A8), and groundwater samples were collected from the well in November 2013. Groundwater samples were analyzed for TPH-G, TPH-D and TPH-O, BTEX, MTBE, 1,2-dichloroethane, *n*-hexane, 1,2-dibromoethane, low-level PAHs, and dissolved lead.

The results of the 2013/2014 data gaps investigation show that the area of soil affected by releases from the Property has been adequately characterized. Visible product and/or sheen were observed in borings conducted over much of the ADC and Exxon/Mobil Parcels, and in the vicinity of the former ADC garage on the Port of Everett property. In general, higher concentrations of COCs were found within the boundary of the Property and in the western portion of the former ADC garage. The boundary of contamination is defined to the east by borings on the BNSF property, where concentrations of COCs were either below the MTCA Method A cleanup level or were not detected. To the west, the boundary of highly contaminated soil is defined by borings PE-SB08 and PE-SB10, where lower concentrations of TPH were detected that were either below or just slightly above the MTCA Method A cleanup level. Contamination west of Federal Avenue is highest at the location of the former ADC garage, and exceedances were observed to the north, south, and west of the former garage footprint. To the north, soil contamination from the Property extends to former Everett Avenue. Soil samples from borings FA-SB06 exceeded the PCLs for TPH-G, TPH-D, total cPAHs and 1-methylnaphthalene. Petroleum contamination on the former KC property farther to the north of former Everett Avenue likely originated from sources that were located on the former KC property.

3.1.8 GROUNDWATER MONITORING

Periodic groundwater monitoring began on the Property in the early 1990s. Regular quarterly groundwater monitoring and monthly LPH gauging and removal commenced in 2002 and continued through 2007, when the groundwater monitoring frequency for the Property was reduced from quarterly to semiannually. This change in monitoring frequency was verbally accepted by Ecology in February 2007, and the acceptance was confirmed in a meeting with Ecology on August 8, 2007.

The monitoring program at the Site currently consists of the following activities:

- monthly inspections of the Site;
- monthly measurements of LPH thickness and depth-to-water in LPH recovery wells (LPH-1, LPH-2, LPH-3, LPH-4, LPH-5, LPH-6, LPH-7, LPH-8, LPH-9, and RW-2), selected monitoring wells (W-1, W-2, W-3, W-6, MW-10, W-10R, MW-11, W-15R, W-17, MW-19, MW-40R, MW-A1, MW-A2), and Sumps 1 and 2;
- semiannual measurement of depth to water in monitoring wells MW-A3 through MW-A8; and

- sampling of designated monitoring wells and laboratory analysis of groundwater samples for TPH fractions, BTEX, MTBE, and selected PAHs.

In addition, LPH is removed from selected wells periodically (see Section 4.7).

The current groundwater monitoring network is shown on Figure 3-3. From 2002 to 2007, groundwater samples were collected from five monitoring wells: MW-11, MW-19, MW-40R, W-3, and W-6. Wells W-3 and W-6 have not been sampled since 2010. Eight additional off-Property monitoring wells (MW-A1 through MW-A8) have been installed since 2008 and are also included in the groundwater gauging and monitoring network.

Groundwater samples are collected using a peristaltic pump and dedicated disposable tubing. The purge water is monitored for field water quality parameters (temperature, pH, specific conductivity, turbidity, DO, and ORP) recorded at 5-minute intervals using a Horiba U-22 (or similar) water quality meter.

Regular groundwater monitoring has produced a comprehensive data set of groundwater elevations and groundwater quality dating back to as far as 1988 (Wood, 2018).

Groundwater samples were submitted to Test America Laboratories for chemical analysis until January 2015, when the laboratory was switched to Eurofins Calscience (Eurofins). All analytical data have been reviewed following requirements specified in U.S. Environmental Protection Agency (EPA) National Functional Guidelines for Superfund Organic Methods Data Review (EPA, 2008, 2017). Analytical data from all groundwater monitoring events are entered into the project database. Analytical results are discussed in detail in Section 6.2 for samples collected in January 2015 from a comprehensive set of groundwater monitoring wells.

3.2 PREVIOUS ENVIRONMENTAL INVESTIGATIONS ON NEARBY PROPERTIES

This section presents a brief summary of information gleaned from environmental investigations conducted for other properties in the vicinity of the Site.

3.2.1 KIMBERLY-CLARK

The former KC property has a long history of industrial use dating back to 1892 (AECOM, 2011; Aspect, 2013a), and has been the subject of extensive environmental investigations over the past 20 years. Aspect completed a Phase 2 Environmental Site Assessment, which included analysis of about 1,200 soil samples and 570 groundwater samples collected from 106 soil borings and 49 new monitoring wells (Aspect, 2013b). Results from the Phase 2 Environmental Site Assessment as well as results from earlier historical investigations were summarized in the RI/FS Work Plan for the former KC property (Aspect, 2013a). The RI/FS work plan documented widespread contamination on the former KC property with areas of TPH, PAHs, arsenic, copper, and nickel in soil and groundwater, and lead in soil, above the applicable screening levels.

Figure 2-6 shows the locations of former Standard and Associated Oil bulk fuel storage and distribution infrastructure on the north side of the warehouse building at the southern end of the former KC property. After purchasing the property from Chevron and successors to the Associated Oil Company, KC continued to use the former Associated Oil Company ASTs on the north side of the warehouse building to store bunker fuel for its boilers, and at least two of these tanks remained in place until 1997 (AECOM, 2011; Aspect, 2013a). ASTs just north of the northeast corner of the KC warehouse were used to store diesel fuel, and one of these tanks was also reported to have stored caustic soda (Aspect, 2013a).

The RI/FS Work Plan documents areas of soil affected by TPH and PAHs above the applicable screening levels on the north side of the existing warehouse building, which is at the southern end of the former KC property, where the former Associated Oil Company ASTs were located (Aspect, 2013a). An area of surface soil was excavated and disposed of prior to removal of the tanks, and KC concluded, based on hydrocarbon fingerprinting analysis, "that the petroleum in the AST area is likely not the same material present at the ExxonMobil ADC site south of K-C's warehouse" (Aspect, 2013a).

Soil samples with petroleum and related constituents exceeding applicable screening levels also have been documented beneath the warehouse building in the vicinity of the former Standard ASTs and piping, but the extent and distribution of potential contamination from this historic source has not been fully characterized.

AECOM (2011) identified the former Associated Oil Company gasoline/bunker fuel AST farm as a recognized environmental condition in their Environmental Site Assessment report, based on the presence of TPH at concentrations exceeding MTCA Method A cleanup levels in the vicinity of the former ASTs and associated underground piping.

Aspect completed an interim removal action beginning in August 2013 to address petroleum-contaminated soil and groundwater on the north side of the KC warehouse. Petroleum-contaminated soil and groundwater were left in place beneath the warehouse and below inaccessible concrete footings. The soils were sampled and found to exceed cleanup levels for TPH. The residual petroleum found in the soils is associated with historical ASTs on the former KC Property, according to the Interim Action Report (Aspect, 2015). Soils to the south of the warehouse on former Everett Avenue were not investigated as part of the interim action.

The RI Work Plan also called for soil vapor sampling to assess potential risk due to vapor intrusion in the event that KC intends to keep the warehouse building intact (Aspect, 2013a). Sampling was completed in March 2014, and results showed that indoor air concentrations were well below screening levels (Aspect, 2014).

A second interim removal action on the former KC property was performed in 2019 and 2020. Interim action activities included decommissioning inactive underground pipes, removing contaminated soil from nine areas within the site, and monitoring groundwater pH levels during the removal of crushed material from the site. The Port of Everett purchased the former KC property in 2019. A third interim action is planned in preparation for redevelopment of the property.

3.2.2 DUNLAP TOWING

Dunlap Towing leases a portion of the Port of Everett property (Aspect, 2013a) and uses it for operation of maritime tugboat vessels. Dunlap Towing maintains and operates a fleet of marine tug vessels at the facility. Marine shipping terminals typically are equipped or have been equipped historically with underground storage tanks (USTs) for storage of diesel fuel or other fuels for maritime vessels.

Ecology advised Amec Foster Wheeler that the Dunlap Towing property has been recognized as a former UST site (Gritsch, 2014). A search of standard regulatory databases conducted by Environmental Data Resources, Inc., on behalf of AECOM (2011) identified the Dunlap Towing property on the UST, ICR, and ALLSITES standard statewide database listings, indicating that the property is of interest to regulatory agencies due to past environmental issues.

Ecology sent Amec Foster Wheeler copies of their files concerning USTs and spill history for the Dunlap Towing property. A leaking 5,000-gallon waste oil UST was located next to the Dunlap Towing shop building, and a 12,000-gallon diesel UST was located next to the current fuel storage area. Both tanks were removed on January 1, 1991, and soil confirmation samples were collected from the bottom and sidewalls of both excavations. A soil sample from the southwest corner of the waste oil tank excavation contained "petroleum oil" at a concentration of 10,000 milligrams per kilogram (mg/kg), which exceeded the PCL. The affected soil was assumed to extend under the building and under an underground electric conduit that runs into the building (Kaldveer Associates, 1991). No soil contamination exceeding PCLs was detected in the soil samples collected next to the former diesel UST excavation. There was a reported spill of an estimated 15 gallons of diesel fuel from a Dunlap Towing tugboat to Port Gardner Bay on October 12, 2008. Based on this information, soil and groundwater contaminated by a waste oil release appear to be present at the Dunlap Towing location.

3.2.3 CALIFORNIA STREET OVERCROSSING PROJECT

Phase I and Phase II Environmental Site Assessments and geotechnical investigations were conducted as part of the California Street/Terminal Avenue Overcrossing (CSTO) Project in the early 2000s (URS, 2000a,b; 2001a,b). The CSTO alignment occupies portions of the neighboring BNSF and Johnston Petroleum properties, as well as public streets and rights-of-way. The southernmost portion of the Property was transferred to the City of Everett as part of the CSTO Project in the early 2000s.

Areas of soil containing concentrations of TPH-G, TPH-D, and/or TPH-O greater than the current MTCA Method A cleanup level were identified over an area of approximately 25,600 square feet within the CSTO Project footprint, mainly to the east and south of the Property (URS, 2000b). URS noted that these soils should be handled as a problem waste and be treated or removed and disposed of at an appropriate landfill as part of the CSTO Project (URS, 2000b, 2001a), but no documentation is readily available to confirm whether contaminated soils were excavated and disposed of, nor is any evidence available to show that record or confirmation samples were collected and analyzed as part of the CSTO Project. It is also expected that residual product is present in soils beneath the Terminal Avenue Overpass footprint.

The Phase I Environmental Site Assessment for the CSTO also identified various 55-gallon drums containing petroleum products on the neighboring Johnston Petroleum property, and minor staining of surface soils attributed to rail and track lubricants on the BNSF property, but these were not considered to be significant contamination sources (URS, 2000a).

3.2.4 PORT OF EVERETT EXCAVATION DELINEATION PROJECT

An investigation of soils on the Port of Everett property was performed by Cardno in 2020 and 2021 (Cardno 2021). The investigation was conducted to achieve two main objectives:

- Determine the vertical and lateral extent of contamination on the Port of Everett property; and
- Delineate the extent of LNAPL and residual saturation contamination to define the limits of remedial excavation on the Port of Everett property so that collection of sidewall and base soil samples during future excavation work is not necessary.

A total of 51 soil borings were advanced to delineate the extent of excavation on the Port of Everett property. Two geotechnical borings were also advanced. A report summarizing the soil investigation and delineating the area contaminated with LNAPL and residually saturated soils (Cardno 2021) is presented in Appendix F; this information will also be included in the DCAP. Analytical results for individual soil borings are not presented on any figures or tables in this report outside of those in Appendix F.

3.2.5 NEARBY CITY OF EVERETT AND PORT OF EVERETT PROJECTS

Other investigations that were undertaken in the Site vicinity included the following:

- In 1996, a CSO replacement project involved replacement of a collapsed section of CSO piping that ran north
 of the Property along the former Everett Avenue owned by KC. This project is more fully described in
 Section 4.4.
- In 2004, the Port of Everett was replacing fence posts along the western side of Federal Avenue directly west of the Property. According to a 2011 phone record (Ecology, 2011), a Port representative reported an observation of oil-affected soil in two to three of the fence postholes, which were reported to be 3 feet deep. The Port representative did not collect a sample but was reporting this observation seven years after the observation was made. Soil sampling data results for MW-33, which is the closest sample to the fence line, show a single PCL exceedance for TPH-G. This exceedance is only slightly above the MTCA Method A cleanup level. AMEC installed two borings in 2013 and 2014 (FA-SB05 and PE-SB-09, respectively) in the approximate area of the fence project, as shown in the phone record documentation. These borings did not encounter soils affected by TPH-O above the PCLs, suggesting that any TPH-O contamination is not widespread (Ecology, 2011). Soil sampling results are discussed in further detail in Section 6.1.
- In 2012, the City of Everett installed a force main from the City's pump station located northeast of the
 Property along former Everett Avenue, and then south along Federal Avenue. This work involved extensive
 dewatering and disposal of TPH-affected soil from the excavation. Additional details and relevant
 observations are discussed in Section 3.1.6.
- As part of the force main replacement project in 2012, the City of Everett's environmental consultant, G-Logics, collected soil samples for analysis at Stations 12+72 and 12+87, as well as two stockpile samples.
 Samples from the stockpile and 12+87 did not contain TPH-D or TPH-O above the reporting limit.
 Sample 12+72 contained TPH-O at 258 mg/kg, well below the respective PCL for TPH-O. Material appearing to

be LPH was reportedly observed by G-Logics to be flowing into the trench from the northeast at Station 13+00; however, no samples were collected for analysis to confirm this observation. See Section 6.1 for additional discussion.

4 SUMMARY OF PAST REMEDIATION ACTIVITIES

Interim remedial actions conducted at and near the Property have included groundwater extraction and treatment, recovery trench installation, soil vapor extraction (SVE), excavation and disposal of affected soil on the Property and neighboring properties, manual LPH recovery, LPH vacuum recovery, excavation dewatering, interceptor trench installation, installation of a low permeability cap over the entire Property, and removal of abandoned piping.

Several attempts at LNAPL recovery have met with limited success. LNAPL has been observed in and recovered from wells, excavations, and recovery trenches installed specifically to recover free product. LNAPL has also been observed in monitoring wells after dewatering activities due to the induced flow of groundwater through the pore spaces. Recoverable quantities of LNAPL have been removed in the immediate vicinity of disturbed soils, but recovery rates typically decrease rapidly once the free product mobilized by soil disturbance has been recovered. High organic content in subsurface soils and the high viscosity and weathered nature of the petroleum hydrocarbons present result in low mobility of the petroleum hydrocarbons that are present. While the decreased mobility of hydrocarbons generally reduces the risk to the environment, recovery of LPH is greatly limited by this immobility.

This section provides a brief description of each of the interim remedial actions. Table 4-1 summarizes major interim actions implemented at the Property and lists the historical documents from which the information was taken. Figure 4-1 shows the general, approximate locations of the key interim remedial measures conducted at the Site.

4.1 1988 RECOVERY TRENCH AND INFILTRATION GALLERY IN VICINITY OF MW-14

LPH was observed at a depth of 1.29 feet during installation of monitoring well MW 14 in April 1988. At that time, RZA evaluated the feasibility of extracting LPH beneath the ExxonMobil Parcel by installing a recovery trench, vapor extraction system, and groundwater treatment system consisting of an oil/water separator coupled with an air stripper. In May 1988, an infiltration gallery was installed in the vicinity of MW 14. The infiltration gallery was T shaped and approximately 45 feet long. Construction activities consisted of trench excavation and installation of two modified 55-gallon drums as sumps. The trench was subsequently filled with 1.5-inch-diameter, washed gravel. On May 12, 1988, a vacuum truck pumped subsurface fluids from the sumps and 1,400 gallons of liquid was removed from the sumps, approximately 50 gallons of which was LPH. As a result of this interim remedial action, the LPH thickness in MW 14 decreased to 0.40 foot in August 1988. The recovery trench and infiltration gallery were decommissioned and removed in 1998 (Section 4.6).

4.2 1989 GROUNDWATER EXTRACTION AND TREATMENT

In March 1989, an automated groundwater extraction and treatment system was installed by RZA in the location of the May 1988 infiltration gallery. The system consisted of a fluid extraction sump situated in RW 1 (formerly MW 14), an oil–water separator, an air stripper, and a re-infiltration gallery. The re-infiltration gallery, which was approximately 100 feet long, was constructed parallel to the north side of the ExxonMobil Parcel. It consisted of a perforated, 4-inch-diameter polyvinyl chloride (PVC) pipe surrounded by pea gravel within the excavated trench. The groundwater extraction and treatment system operated at a pumping rate of approximately 2 to 3 gallons per minute. However, no measurable quantities of LPH were removed, and no LPH was observed in recovery well RW 1. In August 1989, 0.68 and 0.73 foot of LPH was measured in MW 8 and MW 18, respectively (RZA, 1989). Approximately 7 gallons of free product and oily water were hand-bailed from both wells and disposed of in the oil–water separator of the groundwater treatment system at the Property. The groundwater extraction and

treatment system was shut down in March 1990 because of flooding of the re-infiltration gallery, and has not been restarted.

4.3 1993 RECOVERY TRENCH INSTALLATION IN THE VICINITY OF SIDE SEWER

In December 1993, an LPH recovery trench was installed on the southwest corner of the ExxonMobil Parcel. The trench was installed in a north-south orientation to a depth of approximately 4 feet bgs. Two recovery wells that consisted of 8-inch-diameter Schedule 40 PVC screens were placed to a depth of approximately 7 feet in the trench. The trench was backfilled with 7/8-inch-diameter rock to a depth of approximately 3 feet. The rock was overlain by a filter fabric and covered with compacted pit run soil, followed by approximately 6 inches of crushed rock over the pit run to bring the excavation to grade. Concrete vaults were then placed over the recovery wells. Underground PVC piping was extended from the vaults to the remediation equipment compound located on the ExxonMobil Parcel for future access to LPH recovery equipment. Soil excavated during construction was temporarily stockpiled on the Property, covered with visqueen, and later disposed of at an off-Property commercial disposal facility.

No LPH accumulated in the recovery trench, and no LPH was recovered from the trench following installation. The trench was inspected in August 1996, and no LPH accumulation was noted. Subsequent inspections since at least 2002 have not identified recoverable LPH in the trench.

4.4 1996 COMBINED SEWER OVERFLOW LINE REPAIR

In October 1995, discharge of petroleum product into Everett Harbor from a CSO line prompted an investigation by the U.S. Coast Guard Puget Sound Marine Safety Office and the City of Everett to assess the source of the hydrocarbons (AGRA 1996b). The outfall is located on the west side of the 2700 block of Federal Avenue, approximately 175 yards northwest of the ADC Parcel (Figure 2-6). Camera surveys of the sewer lines that flow to the outfall reportedly revealed LPH seepage into the section of the CSO line that runs approximately 40 feet north of the northern boundary of the ADC Parcel (AMEC Earth & Environmental, 2010a). The section of pipe in which the infiltration was observed during the camera survey was discovered to be made of clay tiles that had settled and cracked. In April 1996, Ecology entered into the 1996 Order with Mobil Oil Corporation, ADC, and A.P. Miller requiring cleanup and elimination and/or containment of petroleum releases at and near the City of Everett's CSO discharge line into Port Gardner Bay (Section 2.5). On April 16, 1996, a meeting was held at the City of Everett to discuss options for repairing the broken section of the CSO line. The repair option selected at the meeting consisted of replacement of the settled portion of the line and slip lining of the remaining portions.

In June 1996, AGRA began repair activities on the CSO line (AGRA, 1996b,c). The settled portion of the pipe, approximately 25 feet long, was excavated and replaced. Another section of pipe, which was approximately 20 feet long and made of metal, was found to be corroded and out of round. This section of pipe was also excavated and replaced. The excavation to repair the CSO line in this area was approximately 125 feet long. The remaining portions of the CSO line were slip-lined to eliminate the potential for leakage of LPH through the joints of the intact sections of the existing line. During the excavation activities, LPH was observed entering the excavation from a layer of wood waste where this layer intercepted both the north and south sidewalls.

Three 36-inch-diameter, 22-foot-deep dewatering wells (DW-1 through DW-3) were installed prior to excavation of the CSO line. Dewatering was performed throughout the excavation to allow for repair of the CSO line. Throughout construction, pumps operated alternately, both within the CSO line excavation and within the three dewatering wells. The recovered liquid was transferred to an 18,000-gallon baffled tank, then to two 21,000-gallon settling tanks, and finally to an 18,000-gallon baffled tank. Reportedly, 1,450,800 gallons of groundwater and 23,050 gallons of LPH were removed during CSO line excavation dewatering activities (AGRA, 1996b). During repair of the CSO line, daily LPH recovery volumes varied from 0 to 7,550 gallons. Approximately 80% of the total LPH recovered was removed in the first 6 days of CSO line excavation dewatering.

During CSO excavation and repair activities, oleophilic sorbent booms were installed to absorb and contain LPH discharging into Port Gardner Bay. Sorbent pads, oil sweeps and/or soil snares, sorbent booms, and a mechanical skimmer were used to contain and recover the floating petroleum to the extent practicable.

4.5 1996 LPH VACUUM RECOVERY PILOT TEST

In May and June 1996, AGRA conducted a vacuum LPH recovery pilot test at the Property (AGRA, 1996a,d,e,f; PTI, 1997). The recovery system consisted of SVE and groundwater/LPH pumping systems installed on the newly installed 4-inch vacuum recovery well (VRW 1) located in the northeast corner of the ADC Parcel. The SVE exhaust discharged directly to the atmosphere, while the groundwater/LPH pumping system transferred the extracted liquid to a 500-gallon LPH separation tank, then to a 6,900-gallon groundwater storage tank. The test was performed for 14 days, and LPH thickness and water levels varied significantly throughout the 14 days of testing.

LPH was also removed from a test pit (TP 6 96) with a vacuum truck in May 1996. LPH did not recharge into test pit TP 6 96 during a 2-week period, and no additional LPH was removed.

A 1997 technical memorandum by PTI Environmental Services (PTI, 1997) stated the following conclusions following a review of various LPH recovery efforts:

"Active (LPH and groundwater) recovery performed to date indicates that it is effective in short durations but recovery structures do not continue to recover LPH for extended periods of time when active recovery is performed.

In summary, the complexity of the hydrogeology underlying the area and variable viscosity of the LPH will make future recovery of the LPH from the site difficult. Since there does not appear to be any evidence indicating that migration of the LPH is a threat to human health or the environment and since the site is located in a controlled industrial area, active LPH control does not appear to be warranted. ... It is clear that if subsurface recovery structures (e.g., well, trench) penetrate the wood waste and debris layer, and the LPH has a lower viscosity, a passive LPH recovery program could be effective."

It should be noted that, in nearly 20 years of LPH recovery operations, LPH has not been mobile and passive recovery has not been effective under static conditions (no dewatering). (See Section 6.3 for additional details.)

4.6 1998-2000 INTERIM REMEDIAL ACTIONS

Remedial actions implemented at the Property from the end of 1998 through 1999 included demolition of structures and the aboveground portion of the AST firewall on the ADC Parcel, asbestos abatement, monitoring well abandonment, clearing and grubbing of the ExxonMobil Parcel, construction of an interceptor trench, abandonment of underground utilities, installation of a downgradient liner and LPH collection piping, installation of a low-permeability cap, and installation of a storm drain system (Exponent, 2000). Documented details of the interim remedial measures, based on the Exponent report, are summarized below.

Demolition activities at the Property were completed in January 1999. Prior to demolition activities, Kleinfelder, Inc., performed an asbestos survey. Asbestos was found to be present in buildings on the Property, and asbestos abatement was conducted by Performance Abatement Services between November 12 and 17, 1998.

Structures on the ADC Parcel that were demolished included four buildings (an office building, oil pump house building, a warehouse, and boiler room), aboveground piping, loading racks, the firewall surrounding the former ADC ASTs (including 40 feet of foundation of the wall in the northeast corner of the Property), and the AST pads. In addition, the trench that was installed in 1988 in the vicinity of MW-14/RW-1 was demolished. The two modified 55-gallon drums that had been used as sumps were filled with concrete and left in place. In addition, 22 groundwater monitoring wells were abandoned. Approximately 162 tons of contaminated shallow soil and vegetation were removed from within the ADC firewall area on the northern portion of the ADC Parcel. The soil was disposed of at TPS Technologies in Lakewood, Washington. Approximately 3.5 tons of Class 3 petroleum-affected soil was taken to CRS Associated located in Everett, Washington. Marine Services, Inc., removed 110 gallons of purge water for recycling at a commercial disposal facility.

A water management and treatment system was constructed at the Property in 1998 to manage fluids collected from the interceptor trench and generated during interim measure construction. The treatment system consisted of an oil-water separator, a settling tank, and a carbon polishing unit. Between December 1998 and September 1999, the system treated approximately 2.5 million gallons of water. The treated water was discharged via the storm sewer system to the Everett Water Pollution Control Facility, in accordance with project-specific City of Everett Industrial Waste Discharge Permit No. 154. Approximately 19,900 gallons of oily water and 450 gallons of sludge were collected at the Property between December 1998 and September 1999. Sources of oily water included product recovered from underground pipes prior to removal; water from tank washing prior to removal; water skimmed from excavated areas during interceptor trench construction; and water skimmed from the water treatment system product overflow and flow equalization tanks.

In January 1999, the interceptor trench was constructed along the western and northern Property boundaries. The trench was installed to a depth of 4 to 5 feet below the water table along the northern and western Property boundaries. The trench penetrated the existing wood waste and debris layer. An impermeable liner placed over the downgradient side of the trench, contiguous with an existing footing, was used on the downgradient side of the trench to enhance LPH recovery. The trench was backfilled with uniform washed gravel and was constructed to the current grade. Lateral piping and vaults were also installed during construction of the Property cap construction activities in September 1999. Nine 4-inch-diameter LPH recovery wells (LPH 1 through LPH 9) were installed in the trench.

The LPH recovery trench was explicitly designed to capture LPH passively (PTI, 1997), with the trench installed into the wood waste and debris layer (Exponent, 2000). Only minimal amounts of LPH have ever been recovered from the LPH trench since installation was completed, and although the trench is still present at the Site, no LPH has been recovered by the trench since 2010.

From August to September 1999, cap construction activities were performed, including complete grading of the Property, installation of stormwater catch basins, installation of two layers of geotextile fabric along the entire trench, installation of asphalt-treated base material and paving fabric, installation of the asphalt cap, and abandonment of monitoring wells. Additional minor grading and asphalt paving were completed in December 1999.

4.7 2002-PRESENT LPH BAILING AND GROUNDWATER MONITORING

Manual bailing of LPH from wells that contain a measurable amount of LPH has been performed on a daily, weekly, and eventually on a monthly basis beginning in December 1991. LPH recovery activities currently conducted at the Property are based on the groundwater monitoring program included in the 1998 Order.

The current monthly LPH gauging program consists of the following activities:

- monthly measurement of LPH thickness and depth-to-water in 10 LPH recovery wells (LPH 1 through LPH 9 and RW-2), 13 monitoring wells (W 1, W 2, W 3, W 6, MW 10, W 10R, MW 11, W 15R, W 17, MW 19, MW 40R, MW-A1, and MW-A2), and Sumps 1 and 2;
- removal of LPH from monitoring wells in which more than 0.05 foot of LPH is detected; and
- placement/replacement of oleophilic socks as needed in wells with measurable accumulations of LPH.

From August 2014 through March 2018, LPH was observed in the following locations:

- Monitoring wells W-1, W-2, W-10R, W-15R, and MW-A1; and
- Sump 2.

4.8 2008 PUGET SOUND OUTFALL 5 OVERFLOW STRUCTURE PROJECT

In July 2008, on behalf of the City of Everett Utilities Department, Floyd | Snider collected soil and water samples from an excavation at the CSO Puget Sound Outfall 5 Overflow Structure. The overflow structure was built to control overflows from the CSO into Puget Sound. The project was located north-northeast of the Property. Water samples were analyzed during excavation dewatering to verify that water discharged to the City sewer system met the requirements of the City's industrial pretreatment requirements. Soil samples were collected to characterize soils for disposal. Soil samples were screened in the field. Soil samples that exhibited signs of contamination were not sampled, but instead disposed of under a Class III soil profile. Apparently clean soil samples were sampled per disposal specifications and disposed of as Class II soils. The locations and depths of contaminated soil were not identified by Floyd | Snider or the City of Everett, and no report has been available documenting this work.

4.9 2010 REMOVAL OF ABANDONED PIPES AND AFFECTED SOIL

In 2010, AMEC Earth & Environmental decommissioned several pipelines beneath Federal Avenue to the west of the Property to prepare for upgrades to the storm sewer line planned by the City of Everett. Former underground fuel lines crossing Federal Avenue were excavated and removed, along with surrounding soil (AMEC Earth & Environmental, 2011d). A short segment of piping that extended onto the Port of Everett property also was removed (Figure 4-1).

AMEC Earth & Environmental oversaw pipe removal, off-Site shipment of excavated soil and other materials, and Site restoration performed by Clearcreek Contractors of Everett, Washington, and their subcontractors. Work was performed from June through November 2010. Pipes were evacuated under vacuum prior to removal, and the removed liquids were captured and disposed of along with excavated soil and removed piping material. Samples of excavated soil were analyzed, and results showed that all excavated soil and recovered water could be managed as non-hazardous waste. A total of 76.55 tons of construction debris, 243 tons of soil, 487 linear feet of piping, 65,669 gallons of non-regulated liquid, four 55-gallon product/water drums, and four 55-gallon solid waste drums were removed in general accordance with the Underground Pipeline Decommissioning Work Plan dated May 17, 2010 (AMEC Earth & Environmental, 2010b).

Two soil samples were collected from the base of the excavation and analyzed to characterize the soils left in place. B-POE was collected on the Port of Everett property, and B-WROW was collected on the west side of Federal Avenue. Results from these samples were uploaded to Ecology's Environmental Information Management database and are included in the discussion in Section 6.1. Both samples contained concentrations of TPH-G and undifferentiated TPH greater than the MTCA Method A unrestricted cleanup level; the sample from the Federal Avenue right-of-way also contained concentrations of total cPAHs and TPH-O greater than the MTCA Method A cleanup level (AMEC Earth & Environmental, 2011d).

Five samples were collected from soil stockpiles and analyzed for the following metals: arsenic, barium, cadmium, chromium, lead, selenium, silver, and mercury. In addition, one soil sample was collected from a 55-gallon solid waste drum and analyzed for the same metals. MTCA Method A cleanup levels were used for arsenic, cadmium, chromium, lead, and mercury because this value is the most conservative. MTCA Method B cleanup levels associated with direct contact were used for barium, selenium, and silver because MTCA Method A cleanup levels were not available for these analytes, and because the data were used for waste profiling. Soil samples were not analyzed for chromium speciation therefore the MTCA Method A cleanup level for both trivalent chromium and hexavalent chromium are shown in Table 4-2. The MTCA Method A cleanup level for lead shown in Table 4-2 is the value for unrestricted land use. Detected metal concentrations in all samples were less than their respective MTCA cleanup levels, except for chromium which exceeded the MTCA Method A cleanup level for hexavalent chromium; note that the chromium speciation is unknown.

4.10 2011-2012 EXCAVATION

An interim action was conducted from December 2011 to April 2012 to mitigate seeps of free hydrocarbon product observed along former Everett Avenue (see Section 3.1.5). Work was conducted based on the Excavation Work Plan (AMEC Earth & Environmental, 2011e). The interim action consisted of excavation and off-site disposal of surface asphalt, affected soil, and recovered LPH, and treatment of the recovered groundwater from the secondary source areas on the BNSF and former KC properties (AMEC, 2012a).

The extent of the excavation is shown on Figure 4-1. Excavation work was sequenced beginning on the BNSF property. Approximately 3,060 tons of material was excavated from the BNSF property and disposed of at a permitted landfill, and approximately 2,530 gallons of LPH was removed using a vactor truck. Monitoring wells MW-27 through MW-30 were abandoned as part of the excavation work. Figure 4-2 presents photographs of the excavation on the BNSF property.

The excavation on the BNSF property was extended to the limit of available access, as shown on Figure 4-1. The vertical limit of excavation was extended until a visually clean bottom was exposed, which in most areas was between 8 and 10 feet bgs. LPH and petroleum hydrocarbon contamination was encountered at 3 to 4 feet bgs and extended to 8 to 10 feet bgs. Underlying the upper 2.5 to 3.5 feet of soil cover on the BNSF property was a layer 5 to 7 feet thick (extending to a total excavation depth of 8 to 10 feet bgs) of refuse and debris, consisting primarily of wood, soil, rocks, bottles, and other debris. This fill layer was impacted with petroleum hydrocarbons, including LPH. Figure 4-3 presents photographs of the soil and debris that were removed during the excavation.

Affected material was evident at all sidewall areas of the completed excavation on the BNSF property, and therefore no side wall samples were collected. A low-permeability barrier wall constructed of controlled density fill approximately 3 feet wide by 4 feet deep was placed in an east/west-trending strip running the approximate length of the excavation along the BNSF property boundary, as shown on Figure 4-1. This barrier wall was installed to limit further product migration from the BNSF property. Figure 4-4 presents photographs of the barrier wall installation.

The depths of the excavation on the former KC property were limited by utilities and varied from 3 to 5 feet bgs. The extent of the excavation was limited on the north side in order to maintain a free corridor of 12 feet between the excavation and the KC building. Approximately 725 tons of soil and debris were excavated from the former KC property (on the former Everett Avenue) and disposed of at a permitted off-Site landfill. Affected sidewalls were encountered to the north and east on the former KC property and left in place. Only LPH-affected soils were removed from the former KC property. Photographs from the excavation on the former KC property around the utility corridor are presented on Figure 4-5.

A total of 1,489,246 gallons of petroleum-affected groundwater was removed from the BNSF property. The affected groundwater was treated at the Site and discharged to the Everett publicly owned treatment works. Approximately 12,500 square feet of asphalt was removed from the KC and BNSF properties and disposed of off Site.

The excavation on BNSF property was backfilled using quarry spalls, gravel borrow, and crushed rock. The excavation on the former KC property was backfilled using gravel borrow and crushed rock. The excavations were backfilled in lifts when placing the gravel borrow and crushed rock. Removed asphalt was replaced with asphalt in accordance with local roads standards. Photographs during backfill activities are presented on Figure 4-6.

The excavation on the former KC property was not intended to restore Site soil or groundwater to levels consistent with MTCA Method A cleanup levels, but rather to eliminate seeps of LPH on Everett Avenue to the extent practicable (Section 3.1.5). During this interim action (excavation on the BNSF and former KC properties), LPH was encountered over a greater area and at greater depths than had been anticipated based on previous investigations at the Site.

The excavation extended to the maximum limits that would maintain structural integrity of the neighboring buildings and infrastructure. The excavation was effective in removing COC mass within the accessible portions of the excavation area at the northern and eastern extent of the site, and no LPH seeps have been observed since the excavation was completed. LPH has since returned to a portion of the excavation from adjacent areas, including the inaccessible area, as evidenced by the presence of LPH at Sump 2.

5 CONSTITUENTS OF CONCERN AND PRELIMINARY CLEANUP STANDARDS

As described in Section 3, multiple investigations have been conducted to characterize Site soil and groundwater contamination. Analyses conducted include VOCs; semivolatile organic compounds; TPH-G, TPH-D, and TPH-O; and select metals. The Site has been delineated based on the results of these investigations—the Site includes the Property and extends onto adjacent areas owned by the City of Everett, BNSF, and the Port of Everett to the west and north (former KC property). The delineation of the Site and the Property boundaries are shown on Figure 2-2. This section identifies the Site COCs in groundwater and soil and presents the preliminary cleanup levels (PCLs) that will be used in the FFS.

5.1 CONSTITUENTS OF CONCERN

This section defines the COCs for groundwater and soil at the Site.

5.1.1 CONSTITUENTS OF CONCERN FOR GROUNDWATER

Groundwater monitoring data have been collected at the Site since 1988. Quarterly monitoring of several wells was conducted from 2002 through mid-2007. The monitoring wells have been sampled semiannually since 2007, with the most recent sampling event completed in August 2018 (and latest available validated results from February 2018). These data provide a substantial basis for assessing the nature of Site groundwater contamination and identifying COCs to be addressed in the FFS. A copy of a map showing the analytical results from the four semiannual groundwater sampling events conducted from August 2016 through February 2018 for the 11 wells monitored during each event can be found in Appendix G.

The groundwater COCs to be addressed for the Site are:

- benzene;
- ethylbenzene;
- xylenes,
- 1-methylnaphthalene;
- TPH-G;
- TPH-D;
- TPH-O; and
- cPAHs.

These COCs will be addressed in this SC/FFS. Toluene was not present above the PCL.

5.1.2 CONSTITUENTS OF CONCERN FOR SOIL

Analytical data for Site soil are available from 1988 through February 2014. More recent sampling on the Port of Everett property was conducted in 2020-2021 by Cardno (Appendix F and figures in the DCAP). The COCs in soil are:

- benzene;
- ethylbenzene;

- total xylenes;
- 1-methylnaphthalene;
- TPH-G;
- TPH-D and undifferentiated TPH;
- TPH-O; and
- total cPAHs.

These soil COCs will be addressed by the alternatives evaluated in this SC/FFS.

5.2 PRELIMINARY CLEANUP STANDARDS

This section outlines the proposed preliminary cleanup standards to be used for the Site FFS. The preliminary cleanup standards must be established for affected media and must be appropriate for the anticipated land uses, groundwater uses, and relevant potential exposure pathways identified in the CSM. The affected media identified through previous Site investigations are soil and groundwater.

MTCA regulations require evaluation of remedial action alternatives that are capable of achieving cleanup standards. MTCA regulations establish three components for cleanup standards:

- cleanup levels for COCs that are protective of human health and the environment,
- the point of compliance (POC) where these cleanup levels must be met, and
- other regulatory requirements that apply.

Cleanup levels specified in MTCA can be established using Methods A, B, and/or C; these cleanup levels are required by the Revised Code of Washington (RCW) 70.105D.030 (2)(d) to be "at least as stringent as all applicable state and federal laws." These requirements are similar to the applicable, relevant, and appropriate requirements (ARARs) approach of the federal Superfund law and are described in WAC 173-340-710. The immediate Site area is expected to remain under industrial and commercial use for the foreseeable future. Therefore, the remedial alternatives evaluated in the FFS will include institutional controls requiring the Site to remain under industrial and commercial use. As noted in Section 2.3, residential use of the area is not allowed under the current zoning.

Site-specific PCLs developed in accordance with the MTCA regulatory requirements for cleanup levels are proposed for the FFS. The PCLs must be protective of the relevant potential exposure pathways identified in the CSM, which include the following:

- groundwater—the groundwater-to-surface water pathway (the groundwater discharges to Port Gardner Bay), consumption of marine organisms, direct contact with contaminated shallow groundwater by utility or construction workers, and protection of indoor air quality due to volatilization;
- soil—direct human exposure pathways (ingestion, inhalation of volatile constituents, dermal absorption); and
- soil—groundwater pathway (soil must be protective of groundwater that may be in contact with the soil).

PCLs used in the FFS must be established for the soil and groundwater COCs identified in Section 5.1. Development of the PCLs is discussed in Section 5.2.2.

5.2.1 POINT OF COMPLIANCE

To develop and evaluate a reasonable range of cleanup alternatives in the FS, a POC must be defined for contaminated sites. As defined in the MTCA regulations, the POC is the point or points at which cleanup levels must be attained. As stated previously, the POC, cleanup levels, and other applicable standards, taken together, define the cleanup standard. Sites that achieve the cleanup standards at the POC and comply with applicable state and federal laws, as approved by Ecology, are presumed to be protective of human health and the environment. A POC or multiple POCs will be used in the FFS to design and evaluate potential remedial alternatives. The basis for

selecting the POC(s) for the FFS is described in Sections 5.2.1.1 and 5.2.1.2. The final POC(s) to be used for implementing the cleanup action will be determined after Ecology approves the DCAP and after completing the requirements specified in the MTCA regulations for approval by other agencies, other property owners, and the public. The final POCs will be approved by Ecology as part of the DCAP approval.

5.2.1.1 Point of compliance for soil

The regulatory requirements for the soil POC are presented in the MTCA regulations [WAC 173-340-740(6)]. The requirements for the soil POC depend on the relevant exposure pathways. Therefore, MTCA may require different soil POCs for different COCs. The requirements specified by MTCA are as follows.

- For soil COCs whose cleanup level is based on protection of groundwater, the soil POC shall be established in the soils throughout the Site.
- For soil COCs whose cleanup level is based on human exposure, the POC must include the soils throughout the Site from the ground surface to a depth of 15 feet bgs.

Not all of the remedies considered in the FFS assume that cleanup levels will be attained at a standard POC. The remedies considered will comply with WAC 173-340-740(6)(f), which states that the cleanup action may be determined to comply with the cleanup standards, provided that:

- The selected remedy is permanent to the maximum extent practicable using the procedures in WAC 173-340-360.
- The cleanup action is protective of human health.
- The cleanup action is demonstrated to be protective of terrestrial ecological receptors.
- Institutional controls are put in place.
- Compliance monitoring and periodic reviews are designed to ensure the long-term integrity of the containment system.
- The types, levels, and amount of hazardous substances remaining on the Site and the measures that will be used to prevent migration and contact with those substances are specified in the DCAP.

The remedial alternatives developed and evaluated in the FFS have been designed to achieve these requirements. The preferred remediation alternative is presented in Section 14.

5.2.1.2 Conditional point of compliance for groundwater

MTCA regulations favor a permanent solution that achieves groundwater cleanup at the standard point of compliance (SPOC), which is essentially the volume of groundwater extending beneath a site from the water table to an appropriate depth, as determined by Ecology. If a permanent cleanup action (e.g., a cleanup action capable of attaining groundwater cleanup levels at the SPOC) is not selected for a site or is infeasible, MTCA rules specify additional requirements for a conditional POC (CPOC), as described in WAC 173-340-360(2)(c)(ii).

The groundwater SPOC, as described in WAC 173-340-720(8)(b), would include all groundwater within the saturated zone beneath the Site. Under WAC 173-340-720(8)(c), Ecology may approve use of a CPOC if the responsible person demonstrates that it is not practicable to attain the SPOC within a reasonable restoration time frame and that all practicable methods of treatment have been used. A CPOC is essentially a vertical surface extending downward from the water table and laterally so that it spans the vertical area affected by the release (e.g., the affected groundwater extending beyond the boundary of the Property, across Federal Avenue to the west onto the Port of Everett property). Groundwater cleanup levels would apply everywhere at and downgradient of the CPOC; groundwater cleanup levels could be exceeded upgradient of the CPOC.

MTCA rules specify that a groundwater CPOC may be located either within the boundary of the source property or beyond the source property boundary. The requirements for establishing a groundwater CPOC beyond the property boundary for facilities that are near, but not abutting, surface water are set forth in WAC 173-340-720(8)(d)(ii) and include:

- The CPOC must be located as close as practicable to the source of the release.

- The CPOC must not be located beyond the point or points where groundwater flows into surface water.
- The conditions specified in WAC 173-340-720(8)(d)(i) must be met.
- All affected property owners between the source of contamination and the CPOC agree in writing to the CPOC location.

It is anticipated that a CPOC located on the Port of Everett property, downgradient of the Property, will be established for groundwater. Historically ADC conducted operations on the Port of Everett property, resulting in releases of petroleum products. The specific regulatory requirements (WAC 173-340-720[8][c]) that will apply for establishing a groundwater CPOC for the Site are:

- demonstration that it is not practicable to attain the cleanup standard at the SPOC within a reasonable restoration time frame;
- demonstration that the CPOC is as close as practicable to the source of the release; and
- demonstration that treatment or removal of highly mobile LNAPL source areas are used to the extent practicable in the Site cleanup.

The remedial alternatives developed and evaluated in the FFS will be designed to achieve these requirements.

5.2.2 PRELIMINARY CLEANUP LEVELS

This section describes the PCLs for groundwater and soil.

5.2.2.1 Beneficial use of groundwater

Because of the industrial and commercial zoning classification for the Site properties, Site groundwater is not currently recovered for potable use. Site groundwater will not likely be suitable for potable use in the future, even if the zoning changes, due to the proximity of the Site to marine water in Port Gardner Bay. Site groundwater meets the provisions of WAC 173-340-720(2)(a) through (c) to be defined as non-potable. This means that:

- Groundwater does not serve as a current source of drinking water.
- The groundwater is not a potential future source of drinking water because of the Site's proximity to marine waters in Port Gardner Bay.
- Groundwater is sufficiently connected to the surface water body to render the groundwater not practicable for use as drinking water.

In addition, a portion of the Site was historically used for disposal of refuse prior to 1917. The presence of refuse in the subsurface precludes use of the aquifer as a source of potable water.

The relevant complete potential exposure pathways for groundwater are discharge to the marine surface waters of Port Gardner Bay, contact with contaminated shallow groundwater by utility or construction workers, and exposure to workers within buildings via the inhalation pathway. Currently, there are no buildings over or in the vicinity of the affected soil and groundwater; however, the vapor intrusion pathway is a pathway of concern because it is possible that buildings could be constructed in the future.

5.2.2.2 Preliminary cleanup levels for groundwater

Under the MTCA regulations, groundwater cleanup levels are established based on the current complete potential pathways for exposure to groundwater, which at this Site is discharge to surface water, potential human exposure through consumption of marine organisms, contact with contaminated shallow groundwater by utility or construction workers, and inhalation of indoor air in industrial buildings. Though the groundwater-to-vapor pathway is not currently a complete pathway, this pathway could potentially be complete in the future if buildings are constructed within the Site. The PCLs will be established to be protective of these current and potential future exposure pathways.

PCLs for groundwater are presented in Table 5-1 and were selected by choosing the minimum of the following, in accordance with WAC 173-340-720:

- MTCA Groundwater Table Values (from Cleanup Levels and Risk Calculation [CLARC] website)

MTCA Method A: The MTCA Method A values were only used for TPH compounds because there is not
an applicable federal standard for these compounds. MTCA Method A values for Site COCs other than
TPH are based on the minimum screening levels based on protection of surface water and protection of
indoor air.

Surface Water ARARs

- Water Quality Standards for Surface Waters of the State of Washington (WAC 173-201A): Acute and Chronic effects, Aquatic Life, Marine Water and Human Health Criteria for Consumption of Organisms only.
- National Recommended Water Quality Criteria (Clean Water Act §304): Marine Water, Acute and Chronic effects; aquatic life; and Protection of Human Health, Consumption of Organisms Only.
- Federally Promulgated Water Quality Standards (Code of Federal Regulations [CFR] Title 40, Part 131.45): Revision of certain Federal water quality criteria applicable to Washington; Human Health Criteria, Marine Water.

Protection of Indoor Air

• MTCA Method B groundwater to vapor inhalation screening levels, obtained from a revised Vapor Intrusion Screening table issued by Ecology in April 2015 (Ecology, 2015).

Numerical values for the criteria described above are presented in Table 5-1. The PCLs shown in Table 5-1 for each groundwater COC were selected as the minimum criterion value from the surface water or indoor air ARARs. If no applicable ARAR was available, the MTCA Method A cleanup levels were selected as the PCL. For cPAHs, the lowest criterion was the surface water ARAR for Human Health (0.0021 microgram per liter $[\mu g/L]$). The PCL for cPAHs was revised in accordance with the MTCA regulations (WAC 173-340-705[6]) so that the PCL was not lower than the practical quantitation limit for the project laboratory. The PCL for cPAHs was set equal to the practical quantitation limit, which is also numerically equal to the MTCA Method A cleanup level.

The MTCA Method A cleanup levels for TPH-G, TPH-D, and TPH-O are based on noncarcinogenic health effects for drinking water use; these values were used as the PCLs for these constituents. Therefore, the groundwater PCLs presented in Table 5-1 are protective of the current and potential future uses of the Site.

5.2.2.3 Preliminary cleanup levels for soil

The Site is located in an area zoned for heavy industrial and commercial use; therefore, MTCA Method A Unrestricted or Method B standard soil cleanup levels are appropriate for use at the Site. Additionally, soil cleanup levels must be protective of groundwater, as specified in WAC 173-340-745(5)(A). Using the groundwater PCLs of Table 5-1 and Method A groundwater cleanup levels for ethylbenzene and total xylenes, soil cleanup levels protective of groundwater were calculated in accordance with WAC 173-340-747(4), and the resulting calculated soil cleanup levels are presented in Table 5-2. The calculations are summarized in Table 5-3; the calculated soil cleanup levels protective of groundwater were considered when selecting the soil PCLs shown in Table 5-2.

PCLs for soil were selected by choosing the minimum of the following MTCA cleanup levels:

- MTCA Method A Soil Cleanup Levels for unrestricted use (MTCA Table 740-1). For Site COCs other than TPH, the Method A cleanup levels are based on potable groundwater use and are not applicable to the Site.
- MTCA Method B cleanup level based on direct contact/ingestion for workers obtained from the CLARC website.
- Soil cleanup levels protective of groundwater resulting from the calculations shown in Table 5-3.

The soil PCLs for non-TPH COCs are based on protection of groundwater and the TPH PCLs are based on MTCA Method A cleanup levels for unrestricted land use (Table 5-2). The PCLs for benzene and 1-methylnaphthalene were revised in accordance with the MTCA regulations (WAC 173-340-705[6]) so that the PCL was not lower than the practical quantitation limit for the project laboratory (Table 5-3). As a conservative measure, the PCLs for

saturated soils will generally be applied for site characterization, since shallow groundwater is present throughout the Site and the PCLs for saturated soil are lower (more conservative) than the PCLs for unsaturated soils.

5.3 TERRESTRIAL ECOLOGICAL EVALUATION

Soil concentrations considered protective of terrestrial receptors (plants and animals) were assessed using a simplified terrestrial ecological evaluation following the procedures outlined in WAC 173-340-7492. A copy of the evaluation is presented in Appendix H. The Site qualifies for an exclusion from performing a terrestrial ecological evaluation, based on meeting the requirements of WAC 173-340-7492.

6 NATURE AND EXTENT OF CONTAMINATION

This section discusses the nature and extent of COCs in soil and groundwater at the Site. Many soil and groundwater samples have been collected at the Site since field investigations began in 1991. These investigations are discussed in Section 3. Site soil characterization data based on results from sampling conducted through 2019 are shown on Figures 6-1 through 6-8. The soil sample data shown in these figures represent the highest concentration at a given sample location; these figures do not include data for soil that has been excavated for off-Site disposal. Additional soil characterization results from Cardno's (2021) investigation described in Section 3.2.4 are presented in Appendix F and figures in the DCAP but are not included on these figures. Groundwater characterization for the Site is presented on Figures 6-9 through 6-14. Figures 6-9 through 6-14 are based on groundwater sampling data for samples collected in January 2015. The data used to prepare Figures 6-1 through 6-14 are presented in Appendix E. The extent of affected groundwater defines the boundaries of the Site, as defined in the MTCA regulations at WAC 173-340-200. The Site extent is shown on Figures 6-1 through 6-14; note that the Site boundary does not reflect data from Cardno's investigation presented in Appendix F and figures in the DCAP. The Site boundary is based on the areal extent of soil and groundwater samples that exceeded the PCLs. As shown on these figures, the Site boundary extends onto the former KC property. However, other known sources of Site COCs are present on the former KC property that are being addressed as part of the environmental response under the MTCA program on the former KC property.

6.1 SOIL

The nature and extent of soil contamination at the Site is defined for the following Site COCs:

- benzene:
- ethylbenzene;
- total xylenes;
- 1-methylnaphthalene;
- TPH-G:
- TPH-D and undifferentiated TPH;
- TPH-O; and
- total cPAHs, expressed as benzo(a)pyrene toxicity equivalents.

Undifferentiated TPH results generally represent older samples analyzed using EPA Method 8015M, in which the hydrocarbon classification was not determined. For the purposes of this discussion, undifferentiated TPH is combined with TPH-D. The discussion focuses on those areas of the Site where soil samples exceeded the PCLs discussed in Section 5.2.2.3 for each respective COC. As a conservative measure, analytical results for soil are compared to the PCLs for saturated soils, since shallow groundwater is present throughout the Site and the PCLs for saturated soil are lower (more conservative) than the PCLs for unsaturated soils.

In general, the source areas for the Site COCs are associated with past petroleum product storage and handling areas, including the Property, the former loading racks and underground fuel lines under and near the railroad tracks east of the Property, and the former ADC garage. Secondary soil source areas under the former Everett Avenue and BNSF parcels, the Terminal Avenue Overpass, and Federal Avenue were created through migration of LNAPL from the primary source areas, especially under the influence of dewatering.

The benzene distribution in soil is shown on Figure 6-1; soil samples with benzene concentrations exceeding the PCL of 0.005 mg/kg are scattered along the east side of the ADC Parcel and throughout the ExxonMobil Parcel, with isolated occurrences in samples collected on the former KC property to the north and Federal Avenue just east of the former ADC garage location. Figures 6-2 and 6-3 show the soil samples with ethylbenzene and total

xylenes, respectively, that exceed the applicable PCLs. These two COCs are generally found in the same general area as the benzene exceedances.

The locations where 1-methylnaphthalene concentrations in soil exceed the PCL of 0.5 mg/kg are shown on Figure 6-4. The distribution extends east, north, and west of the properties formerly used by ADC, including the former ADC garage property west of Federal Avenue.

The TPH-G distribution in soil is shown on Figure 6-5; soil samples with TPH-G exceeding the PCL of 30 mg/kg were located across the Site, with samples collected from locations under the Terminal Avenue Overpass, extending west through the Property, and north and west of the Property onto the location of the former ADC garage. (The more conservative standard of 30 mg/kg was selected as the PCL for TPH-G since benzene was commonly detected in the same samples as TPH-G.)

The TPH-D and undifferentiated TPH distribution in soil is shown on Figure 6-6. Points on Figure 6-6 are treated as an exceedance if the sum of the TPH-D plus TPH-O concentrations is greater than the PCL of 2,000 mg/kg. Soil samples with TPH-D concentrations exceeding the PCL of 2,000 mg/kg extend from under the Terminal Avenue Overpass through the center of the Property and to the west onto the location of the former ADC garage. Exceedances also occur to the north of the Property on the former Everett Avenue.

Borings CE-6 and FA-SB06 were installed south and west of the remaining warehouse building on the former KC property, respectively (Figures 6-1 through 6-8). Both were installed after completion of the CSO replacement project in 1996, where extensive dewatering was required during repair and replacement of the CSO line. During completion of the CSO repairs, nearly 1.5 million gallons of groundwater was recovered, along with approximately 23,000 gallons of LNAPL. (See Section 6.3 for details.)

Both borings contained 5 to 6 feet of silty sand over well-graded sand with silt. Samples for analysis were collected from both the upper finer soil layer and the lower coarser layer in both borings. The samples from the lower layer contained TPH-D at concentrations of 5,390 mg/kg in CE-06 and 3,130 mg/kg in FA-SB06. A minor exceedance for TPH-G in CE-06 (381 mg/kg) was also noted. None of the shallower soil samples for these two borings contained COCs above the PCLs. This pattern suggests that dewatering for construction may have caused lateral movement of COCs and LNAPL through the higher permeability fill materials, likely from the north and northwest of these two locations rather than from the Property. The dewatering proceeded from east to west then south; if surface spills or releases had been responsible for the observed soil contamination then the shallow soils should also have been contaminated.

The TPH-O distribution in soil is shown on Figure 6-7. Points on Figure 6-7 are treated as an exceedance if the sum of the TPH-D plus TPH-O concentrations is greater than the PCL of 2,000 mg/kg. Soil samples with TPH-O concentrations exceeding the PCL are more scattered in distribution than TPH-G or TPH-D, with isolated occurrences near the location of the former ADC garage. While TPH-O was detected in a discrete soil sample collected from the Everett Force Main project in 2012, the sample collected from Station 12+72 only contained TPH-O at 258 mg/kg, well below the MTCA Method A TPH-O PCL of 2,000 mg/kg (G-Logics, 2012). This sample was reportedly collected from an area where G-Logics reported a sheen; however, the analytical result does not reflect the concentration expected where free product is observed.

The cPAH distribution in soil is shown on Figure 6-8. The cPAH concentrations are expressed as the toxicity equivalents of benzo(a)pyrene, and concentrations of cPAHs exceeding the toxicity equivalent PCL of 0.1 mg/kg can be found from the northeast portion of the Site to the west, scattered across the property, and on the former ADC lease area on the west side of Federal Avenue. Two isolated exceedances located to the south are attributed to the presence of cPAHs along a former BNSF Spur line and the associated creosote-tainted railroad ties.

As shown on the geologic cross-sections (Figures 2-8 to 2-13), the vertical distribution of benzene, other aromatic hydrocarbons, and TPH (all hydrocarbon classes) generally occurs in the upper 10 feet of soil. Note that the soil characterization results from Cardno's (2021) investigation described in Section 3.2.4 are not included in these cross sections; cross sections for the results from Cardno's investigation are presented in Appendix F and figures in the DCAP. These COCs are also found below the water table, where smear zones and rising groundwater levels have trapped the COCs in the soil. As discussed in Section 6.3, some of the TPH analytical results are high enough in concentration to suggest that the hydrocarbons are present in residual saturation or as LNAPL. Hydrocarbons in residual saturation can be mobilized if the soils are dewatered. Under current conditions, however, most hydrocarbons are immobile and are likely trapped in residual saturation below the water table.

6.2 GROUNDWATER

The nature and extent of groundwater contamination at the Site is defined for following Site COCs:

- benzene;
- ethylbenzene;
- xylenes
- TPH-G;
- TPH-D;
- TPH-O;
- cPAHs, expressed as benzo(a)pyrene toxicity equivalents; and
- 1-methylnaphthalene.

The areas with the highest concentrations of COCs are associated with the primary and secondary source areas discussed in Section 6.1.

Table 6-1 presents the results of semiannual groundwater sampling from an expanded network of wells in 2015. Only the January 2015 groundwater monitoring data are used to discuss the nature and extent of affected groundwater, as this data set included samples from several wells that are not routinely sampled and is, therefore, more comprehensive than the other semiannual data sets. Based on a review of 17 years of semiannual groundwater data, the Site exhibits only a limited seasonal variation in groundwater quality. The January 2015 groundwater data were reviewed in accordance with the project-specific data validation standards for the Site requirements, and the data review memorandum and laboratory reports are included in Appendix E.

As discussed in detail in the letter report in Appendix I, and as shown in Tables 4 and 5 of that report, it appears that the Test America laboratory's silica gel cleanup methodology for the TPH-D and TPH-O groundwater samples was insufficient to remove polar compounds, which silica gel cleanup is intended to accomplish. The corresponding Eurofins split-sample analytical data are much lower in reported TPH-D and TPH-O concentrations than the corresponding Test America samples. Comparisons of TPH-G, benzene, and cPAH analytical results are comparable between the two laboratories. The primary difference between the Test America and Eurofins split-sample analytical data is the effectiveness of the silica gel cleanup of the TPH-D and TPH-O samples. The most recent Eurofins laboratory TPH-D and TPH-O analytical results will be used when discussing the nature and extent of TPH-D and TPH-O in groundwater samples.

The benzene distribution in groundwater is shown on Figure 6-9; there were two exceedances of the groundwater benzene PCL of 1.6 μ g/L during the January 2015 sampling event in a sample collected from LPH-1, located at the southern end of the LPH recovery trench, and W-15R, located in the southeast quadrant of the ADC parcel. Since 2014, additional exceedances of the benzene PCL for groundwater samples have been observed for samples collected at LPH-1, MW-15R, and MW-40R. It should be noted that wells MW-15R and MW-40R also contain LPH.

The TPH-G distribution in groundwater is shown on Figure 6-10; TPH-G exceeded the PCL of 800 μ g/L in groundwater from two monitoring wells located east of the Property—monitoring well W-17 and Sump 2. Both of these locations border the former BNSF excavation. TPH-G was also detected above the PCL in two groundwater samples collected from W-2 and W-15R, both located on the Property. It should be noted that both of these wells often contain LPH, which might have influenced these analytical results. TPH-G was not detected above the PCL in any of the other groundwater samples collected from the Property or the Port of Everett property, and was not detected in the groundwater from wells installed on Federal Avenue.

The TPH-D distribution in groundwater samples is shown on Figure 6-11. Groundwater samples with TPH-D concentrations exceeding the PCL of $500~\mu g/L$ occur throughout the Property and extend west into and beyond Federal Avenue, and also occur in samples previously collected on the former KC property, the former BNSF property, and underneath the Terminal Avenue Overpass. The most recent TPH-D analytical results from Eurofins show that the groundwater samples collected from MW-A5 and MW-A6 on Dunlap Towing property were below the Method A groundwater cleanup level for TPH-D (Appendix G). A single exceedance was recorded in February

2016 at MW-A5 with an estimated concentration of 540 μ g/L (denoted by a "J" quality assurance flag). Dunlap Towing is known to use diesel fuel in its business operations. All TPH-D results for MW-A5 since August 2016 have been below the PCL (Appendix G).

The TPH-O distribution in groundwater is shown on Figure 6-12. TPH-O concentrations in groundwater exceeding the PCL of 500 μ g/L occurred in samples collected from LPH-4 on the Property and from Sump 2, located east of the ExxonMobil Parcel on the BNSF property.

The cPAH distribution in groundwater samples is shown on Figure 6-13. Concentrations of cPAHs, expressed as benzo(a) pyrene toxicity equivalents, exceeded the PCL of 0.1 μ g/L in groundwater samples from only two locations. One location, monitoring well W-1, is located on the ExxonMobil Parcel, and the other location, Sump 2, is located east of the ExxonMobil Parcel on the BNSF property.

1-Methylnaphthalene exceeded the PCL of 1.5 μ g/L in multiple wells located on or near the ADC and ExxonMobil parcels, but not west of Federal Avenue (Figure 6-14).

Concentrations of ethylbenzene and total xylenes were both below detection limits for all wells sampled in January 2015.

6.3 LIOUID-PHASE PETROLEUM HYDROCARBONS

LPH has been observed in wells, trenches, sumps, and excavations at the Site since environmental investigations began. The LPH varies in nature from TPH-G to TPH-D to heavier TPH-O fractions, and all of the LPH is generally characterized as "weathered" in various laboratory reports.

The viscosity and weathering of the LPH limit mobility of LPH at the Site. The original releases occurred between 25 and 90 years ago. Weathering, including volatilization of lighter hydrocarbons and microbial degradation, works to increase the viscosity of the LPH and limit the ability of the LPH to flow and accumulate in the subsurface. This increased viscosity contributes to the limited effectiveness of the LPH recovery trench. The weathered LPH preferentially adsorbs to peat, wood waste, and other organic constituents present in the subsurface, further limiting the mobility of LPH.

LPH has been observed on the BNSF parcel, on the Property, seeping through damaged asphalt along former Everett Avenue during periods of elevated groundwater, and across Federal Avenue in groundwater monitoring well MW-A1. Many of the observations describe the LPH as being viscous. Comingling of the various types of products that have been handled on the Properties—diesel fuel, stove oil, heavy fuel oil, Bunker C, and gasoline, among others (AGRA 1996a)—can change the viscosity of the LPH. Viscosity can also increase due to weathering in the subsurface, which typically results in degradation of the light hydrocarbons, making the overall LPH thicker and more difficult to recover. Since 2010, limited amounts of LPH (< 40 gallons) have been recovered from five monitoring wells and/or sumps at the Site.

Table 6-2 outlines the various attempts at recovering LPH from wells, excavations, sumps, recovery wells, and the LPH trench. LPH has been recovered from the Site using active methods (groundwater pumping and vacuum-induced skimming) as well as passive methods (oleophilic absorbents and LPH pumping). However, as shown in Table 6-2, passive LPH recovery yields very small volumes of hydrocarbon over time: over the past six years of LPH monitoring and recovery, no LPH was recovered from the LPH recovery trench despite it being designed for that purpose (Exponent, 2000). Approximately 34 gallons of LPH has been captured from recovery and groundwater monitoring wells (W-1, W-2, W-10R, W-15R, and MW-A1) using passive recovery techniques, bailing, peristaltic pumps, and/or oleophilic socks since March 2010. Oleophilic socks are the preferred recovery method since the field sampling personnel can quickly extract and contain the socks while minimizing chances for contamination.

The largest quantities of LPH have been recovered as a by-product of dewatering, such as the dewatering events that occurred during the 1996 CSO replacement project and the 2011–2012 BNSF excavation. While the volume of LPH recovered during dewatering is not insignificant, the volume of water requiring handling, disposal, and treatment as a result of these dewatering events is many times greater than the LPH volume. During the CSO replacement project in 1996, LPH accounted for only 1.6% of the recovered water volume; during the BNSF excavation, LPH accounted for only 0.4% of the recovered groundwater volume.

The behavior of LPH under both active and passive recovery techniques suggests that most of the LPH is in residual saturation and can be mobilized only under the extreme hydraulic gradients induced by dewatering. Soil with concentrations of TPH-G, TPH-D, TPH-O, or undifferentiated TPH potentially high enough to indicate the presence of immobile, residual LNAPL or floating, potentially mobile LNAPL is found both on and upgradient of the Property, on the recently cleaned up BNSF property, underneath Federal Avenue and the former Everett Avenue, and on the former ADC garage area on property owned by the Port of Everett (Figure 6-15). Note that the soil characterization results from Cardno's (2021) investigation described in Section 3.2.4 are not included on Figure 6-15; results from Cardno's investigation are presented in Appendix F and figures in the DCAP. *Residual saturation* is defined as fluid distributed within a porous medium and held in place by capillary action. Under these conditions, the fluid is not connected between pores; therefore, it does not flow. The quantity of LNAPL in a soil under residual saturation conditions depends on the fluid properties of the LNAPL, the specific soil properties, and the percentage of water saturation. The fluid properties of LNAPL can vary widely, depending on the composition and viscosity of the liquid.

The distinction between residual LNAPL and potentially mobile LNAPL is based on research into how much LNAPL is expected to be retained by saturated soils of various textures for different LNAPL viscosities. In general, LNAPL with higher viscosity has a correspondingly higher residual saturation. Table 747-5 in the MTCA regulations (WAC 173-340-900) presents a generic screening level for residual saturation of 2,000 mg/kg for TPH-D; however, the actual residual saturation concentration for a given soil type depends on the soil grain size and the specific properties of the LNAPL.

In preparing Figure 6-15, potential residual saturation levels for TPH fractions were selected based on the sand and silty sand soils typically present at the Site and TPH concentrations observed historically in soil samples collected at the Site. Residual saturation levels for TPH-D, TPH-G, and TPH-O were determined for site-specific data using guidance from *Non-Aqueous Phase Liquid (NAPL) Mobility Limits in Soil* (Brost and DeVaull, 2000). Residual saturation levels for TPH-G in soils at the Site range from 2,470 to 3,410 mg/kg. Residual saturation levels for TPH-D in soils at the Site range from 4,800 to 8,840 mg/kg. Similarly, residual saturation of TPH-O is based on residual saturation concentrations for fuel oil in soils similar to Site soils, yielding concentrations ranging from 5,810 to 11,000 mg/kg. LNAPL was assumed to be present when concentrations exceeded the upper limit of the residual saturation concentrations. The residual saturation levels for TPH-G were used for historical undifferentiated TPH analyses, as those concentrations were most conservative. Therefore, LNAPL present at the locations shown on Figure 6-15 was identified as representing potentially mobile LNAPL, based on field observation of LNAPL in the wells, or residual saturation, based on soil analytical results and these residual saturation concentrations. Note that the soil characterization results from Cardno's (2021) investigation described in Section 3.2.4 were not used in this analysis; the results from Cardno's investigation are presented in Appendix F and figures in the DCAP.

Starting in January 2012 and extending through June 2014, AMEC Earth & Environmental conducted a study to assess LPH behavior in five Site monitoring wells: W-1, W-2, W-10R, W-15R, and MW A1. For this study, the oleophilic (or sorbent) socks normally deployed in these wells were removed because the sorbent socks preclude LPH accumulation in the well. Figures 6-16 through 6-20 show groundwater elevations graphed against measured LPH thicknesses in the five wells that contained greater than 0.2 foot of LPH during the study period. The primary observations that can be drawn from the plotted data are:

- For four out of five wells, rising groundwater elevation causes a greater amount of LPH to gather in the wells.
- For MW-A1, no LPH was present until May 2013, approximately one year after the completion of the City of Everett Force Main Installation Project. MW-A1 has contained LPH since May 2013, and the amount of LPH measured in the well does not correlate to groundwater elevation.

The increase in LPH thickness with rising groundwater elevation indicates that LPH is being released from finer grained sediments and accumulating in coarser fill materials under the influence of buoyancy. The coarser grained sediments have a lower residual saturation concentration, so the LPH can accumulate in the more permeable filter pack around the well screen. As the groundwater elevation falls, the LPH in both the coarser fill and filter pack is re-absorbed into the finer grained fill materials that have a higher residual saturation, and the LPH is immobilized.

MW-A1 was installed before the force main installation. The excavation for the force main, which proceeded along the former Everett Avenue from the east to Federal Avenue, and then south along Federal Avenue to the intersection with Terminal Avenue, appears to have extended to within a few feet of the well. It would appear

that the path of dewatering and the amount of dewatering was sufficient to mobilize LPH, and as the dewatering moved past MW-A1 to the south, the LPH was left in the more permeable excavation backfill. Data indicates that this LPH eventually seeped into the coarser sand pack surrounding well MW-A1. Because of the uniformity of the excavation backfill compared to the native silty sands, wood waste, and debris, the residual saturation of the sand pack and pipe bedding material is very similar. Therefore, there should be less correlation of LPH thickness with changes in groundwater elevation in MW-A1.

6.4 EVIDENCE FOR BIODEGRADATION

Figure 6-21 shows trend charts of total BTEX concentrations over time for selected wells based on ongoing groundwater monitoring. These wells represent locations upgradient, within the source areas, and downgradient of the Property. We chose total BTEX as representative of the decrease in dissolved-phase contamination over time, as BTEX compounds are more easily dissolved and transported with groundwater flow.

Wells shown on Figure 6-21 (MW-11, MW-19, MW-40R, W-3, and W-6) have the most extensive long-term groundwater monitoring history. Wells that were only sampled early in the monitoring program, and which have since been abandoned, and wells with limited detections of cumulative BTEX did not contain sufficient data to plot. All of these wells exhibit a decrease in total BTEX concentrations over time, supporting the idea that hydrocarbons in groundwater are being biodegraded either aerobically or anaerobically.

Figure 6-22 shows sulfate concentrations and ORP results for samples collected during the 2011 Data Gaps Investigation (AMEC Earth & Environmental, 2010a). The figure shows that both sulfate concentrations and ORP decrease downgradient of the source area, which suggests that sulfate reduction of contaminants is occurring as groundwater passes through the source area. These data further support the idea that hydrocarbons in groundwater are undergoing natural biodegradation under current conditions.

7 AQUIFER AND TIDAL STUDIES

A number of aquifer and tidal studies have been performed at the Site. This section summarizes the results of these studies. Tidal studies focus on assessing fluctuations in groundwater level induced by adjacent marine waters. Aquifer studies are focused on characterizing the hydrogeologic properties of the saturated zone. Two types of tests have been performed within groundwater wells at the Site to characterize the shallow groundwater zone: aquifer (or pump) tests and slug tests. In an aquifer test, a given well is pumped at a constant rate or a series of rates and the aquifer drawdown is measured in nearby observation well(s). Aquifer tests are expensive and time-consuming to perform but generally provide data that are more accurate than slug test data. A slug test involves rapidly introducing or removing a solid plug from a well, which creates a rapid rise or decrease in the water level in the well. The resulting change in water level within the test well is then measured as it returns to the initial water level. Slug tests are easily performed, but the data are generally considered to be lower in quality due to limitations on the size of the slug and the amount of water displaced during the test.

7.1 AQUIFER STUDIES

AGRA performed an aquifer pump test on three wells located on the Property (MW-10, MW-18, and RW-1) during the 1990s (Exponent, 1998). During the test, groundwater was extracted from RW-1 and the drawdown or response was measured in MW-10 and MW-18 along with the pumping well. Table 7-1 presents the hydraulic parameters calculated from different responses to pumping or recovery at these three wells. Hydraulic conductivity is a measurement of how the aquifer matrix transmits water in response to pumping from the test well (RW-1). As shown in Table 7-1, hydraulic conductivities measured during these tests ranged from approximately 1.4×10^{-3} centimeters per second (cm/sec) to 3.4×10^{-3} cm/sec, with an average of 2.1×10^{-3} cm/sec. This range of hydraulic conductivities is consistent with the silty to poorly graded sands that have been observed in the saturated zone located beneath the Property.

Slug tests were performed in three monitoring wells located on the Port of Everett property, which lies west and northwest of the Property. Typically, data from the "rising head" portion of the slug test, when the slug is suddenly removed from the well, is more accurate than the "falling head" portion. Three monitoring wells, MW-A1 (west of the Property) and MW-A5 and MW-A6 (northwest of the Property at Dunlop Towing) were tested five times each. The geometric mean of the five test results for each of the three wells are presented in Table 7-1. The mean hydraulic conductivities from these slug tests ranged from approximately 6.4 x 10^{-3} to 2.7×10^{-2} cm/sec (AMEC Earth & Environmental, 2010a). These measured hydraulic conductivities are consistent with values expected for the cleaner and slightly coarser fill materials that have been observed in the filled area west and northwest of the Property. The results shown in Table 7-1 indicate that the native soils underlying the Property have slightly lower hydraulic conductivities than the filled area west of Federal Avenue.

7.2 2011 TIDAL STUDY

The most extensive and complete tidal study was performed at the Site over a two-week period in February 2011. The purpose of the tidal study was to determine the extent of tidal influence and the mean groundwater level at the Site. Data were collected from 13 groundwater monitoring wells installed across the Site. Non-vented, self-logging transducers were installed in each of the groundwater monitoring wells and in a stilling well installed on the Everett Pier. Water levels were recorded at 6-minute intervals at the same time by each transducer. A separate barometric pressure-logging transducer was also used to record the barometric pressure at the Site.

Tidal influence was observed to be strongest in monitoring wells W-3, MW-11, MW-A1, MW-A2, MW-A3, MW-A5, and MW-A6, which indicates that water levels in these wells are influenced by tidal fluctuations in the adjacent Port Gardner Bay. The tidal fluctuations measured in wells ranged from 0.1 foot to 1.1 feet. It should be noted that the tidal fluctuations measured in the stilling well in Port Gardner Bay had a magnitude of approximately 9 feet, while the data recorded in the monitoring wells showed a significantly dampened response in even the most strongly influenced well (AMEC Earth & Environmental, 2011a). The most strongly influenced wells are located west of the Property, closer to Port Gardner Bay. Well MW-11, located on the east side of the Property, had a strong tidal response; this is likely due to a preferential flow conduit (probably a former stream channel) that

transmits the tidal signal inland to MW-11. With the exception of MW-11, wells located on and east of the Property had minimal response to tidal fluctuations, and mainly responded to changes in barometric pressure (AMEC Earth & Environmental, 2011a).

7.3 2014 TIDAL STUDY

Since the 2011 tidal study, completed over a limited two-week period in February 2011, showed a significant tidal impact on groundwater levels, logging transducers were placed in several wells in July 2014 to collect groundwater level data to support the FFS and to better characterize Site groundwater flow. A total of seven self-logging, non-vented transducers were installed in RW-2, MW-40R, MW-A1, MW-A2, MW-A3, MW-A4, and MW-A5. In addition, a logging barometric transducer was placed on the Property. Water levels in each of the wells were logged simultaneously with barometric pressure every 15 minutes during this period. The data recorded by each well transducer and the barometric transducer are periodically downloaded and analyzed to assess groundwater elevations in these wells. Groundwater elevation data collected prior to October 2014, including hydrographs for the wells, are discussed in Section 2.4.6.

Figure 2-15 is a groundwater contour map based on the mean groundwater elevations measured in August 2016 using the transducers. The mean groundwater elevations were calculated using a 25-hour average of the recorded water levels to filter short-term tidal influence and show mean groundwater flow conditions (Serfes, 1991). Mean groundwater flow direction is generally to the west, with seasonal fluctuations. The hydraulic gradient is much steeper across the Property (at 0.037) compared to the area west of Federal Avenue, where the gradient decreases to 0.006. This change in gradient likely reflects changes in permeability, with the more permeable sands west of Federal Avenue allowing groundwater levels to equilibrate compared to the lower permeability, silty sands on the Property.

As discussed in Section 2.4.6, there is limited mixing of Site groundwater with surface water because the tidal response of the groundwater is limited and because groundwater flows in response to the mean or average hydraulic gradient in the groundwater. Mixing during any one tidal cycle is limited to the area immediately adjacent to the Port Gardner seawall, within the distance groundwater can travel during the "flood" portion of the twice-daily high tides.

8 CONCEPTUAL SITE MODEL

This section presents the CSM based on the geology, hydrogeology, and history of the Site and the nature and extent of soil and groundwater contamination. The purpose of the CSM is to document Site characteristics that affect the fate and transport of COCs and the relevant potential exposure pathways for the Site.

Section 8.1 summarizes Site geology and hydrogeology as determined through Site investigation data, data from interim remedial actions, tidal studies, and observations during historic dewatering activities conducted as part of interim remedial actions and construction activities. Section 8.2 presents the various potential exposure pathways for potential receptors. Section 8.3 summarizes the CSM and identifies data gaps and/or uncertainties that remain, if any.

8.1 GEOLOGY AND HYDROGEOLOGY

Figure 8-1 shows a plan view of the CSM, and Figure 8-2 shows a generalized cross-section adapted to show the features of the CSM. Figure 8-1 also shows the Site boundary based on the extent of soil and groundwater exceeding PCLs, as detailed in Section 6.0. Note that the soil characterization results from Cardno's (2021) investigation described in Section 3.2.4 are not shown in these figures and were not used to define the Site boundary; the results from Cardno's investigation are presented in Appendix F and figures in the DCAP.

The Property was developed over former nearshore marsh and mudflats that have generally been infilled to prepare the area for development. Aerial photographs show the pre-development shoreline near the west side of the present Federal Avenue. The surface soils (uppermost 5 to 10 feet) at the Site are characterized by heterogeneous mixtures of fill generally consisting of very loose to medium dense silty sand and sand with areas of peat. Occasional debris, such as wood, glass, lumber, and brick pieces, have been observed mixed into the peat. This debris likely originated from past residences that occupied the marshy grounds prior to regrading and filling, and some may possibly have been present in the material used to fill the site. The surface fill overlies native glacial advance outwash deposits and transitional beds (Section 2.4.2). The historical shoreline west of Federal Avenue was gradually extended to the west beginning sometime after 1917. By 1976, the shoreline had been extended to its current location, approximately 500 to 600 feet west of the 1917 shoreline. The source of the fill materials used to extend the shoreline to the west is unknown.

The hydrogeology at the Site has been significantly affected by the changes in topography and shoreline. The area near the Property was occupied by small residences in 1902, surrounding what was labeled "marsh" on an historical fire insurance map (Appendix A) The former marsh is likely represented by peat deposits that underlie much of the current land surface. The 1902 groundwater surface beneath the Property likely corresponded roughly to the surface water elevation in the former marsh. Over time, the groundwater table would have risen as the discharge area (i.e., the shoreline) was extended to the west. After the shifting of the shoreline, groundwater within the native fill deposits beneath the Property rose until the depth-to-groundwater along the eastern portion of the Property reached 2 to 3 feet. Surface seeps of groundwater have been observed at the base of the Terminal Avenue Overpass just east of the BNSF parcel and along the BNSF tracks and the City of Everett lift station. Shallow groundwater was also observed during the 2011–2012 excavation on the BNSF parcel. These observations suggest that the vadose zone on the east side of the Property is not very thick. The 2014 tidal study (Section 7.3) showed that the groundwater hydraulic gradient beneath the Property is six times steeper than the hydraulic gradient west of Federal Avenue. This steeper hydraulic gradient is an indication that native sediments are more restrictive to groundwater flow (lower permeability) than the sandy fill materials west of the Property, as also indicated by aquifer test results (Section 7.1).

Residual LNAPL is present in some areas of the Site, observed as either a floating layer in a well or sump or observed in soil based on measured concentrations at or above the expected residual saturation concentration (Section 6.3). The Property had been used as a petroleum product storage depot for approximately 50 years prior to the infilling that moved the shoreline to its current location. Historical releases of petroleum products would have pooled on the lower water table/capillary fringe elevation that existed at that time. As the groundwater surface beneath the Property rose after the shoreline was extended, the rising groundwater would have submerged and trapped petroleum product within the depth interval between the historic and new water table

elevations. As shown by the LPH responses to rising groundwater elevations discussed in Section 6.3, LPH in some areas accumulates in the well casing. Most of the five wells that occasionally contain LPH are also adjacent to or upgradient of the LPH trench, yet LPH is not recovered from the trench. This observation suggests that the LPH is discontinuous and immobile, and does not flow into the LPH trench recovery sumps.

Under normal groundwater conditions (i.e., in the absence of construction dewatering), LNAPL at the Site is immobile, and historic attempts to recover LNAPL from the subsurface using standard hydrocarbon recovery techniques have not been successful. However, changes in the water saturation of soils can remobilize residually saturated LNAPL when relationships between LNAPL, water, the porous media, and air change. Such a change can occur when dewatering for construction or excavation lowers groundwater levels across a large area for an extended period of time, allowing the vadose zone to expand and the hydraulic gradient to steepen. These conditions appear to have mobilized LNAPL during excavation activities associated with the 2011-2012 interim action (Section 4.10) and the City of Everett force main project in 2012 (Section 3.1.6). AMEC began measuring LNAPL in Sump 2, which was installed in the former BNSF excavation in the quarry spall backfill, starting in mid-October 2013. Since then, LNAPL has continued to accumulate in Sump 2. LNAPL was also observed in MW-A1, located on Federal Avenue, in July 2013 after the City of Everett force main project. The dewatering cone of depression associated with the force main excavation would have pulled groundwater from the north as dewatering proceeded to the south. Therefore, the LNAPL observed in MW-A1 could potentially be attributable to either the Property or an off-Site source.

The LNAPL present at the Site originates from releases that occurred 30 to potentially 100 years ago. As such, the LNAPL is highly weathered, and has been generally depleted of the more soluble and mobile hydrocarbon components. Weathering of the releases has increased LNAPL viscosity and further decreased the mobility of the petroleum hydrocarbons remaining at the Site. The fine-grained sediments and organic matter identified beneath the Site (wood waste and peat) also limit migration and recovery of LNAPL, resulting in higher residual saturation concentrations for hydrocarbons in fine-grained soils and high levels of adsorption to organic materials. The limited downgradient extent of groundwater affected by dissolved COCs further demonstrates that migration of LNAPL constituents from the source areas is minimal.

8.2 FXPOSURF PATHWAYS

This section summarizes potential exposure pathways relevant to the Site.

8.2.1 SOIL

There are four potential exposure pathways for soil contamination at the Site; direct exposure, volatilization to subsurface vapor, dissolution into groundwater, and contact with COC-affected soil in stormwater, surface water, and sediment.

Direct exposure to soil contamination through dermal contact or incidental ingestion could potentially expose temporary construction workers during subsurface construction. Subsurface construction could be performed as part of remediation, as part of underground utility repair/replacement within the Site, or for property redevelopment. Direct exposure to soil COCs is a complete pathway. Existing surface cover limits the potential for direct exposure to other potential receptors.

Volatilization of constituents from soil within the source areas directly to subsurface vapor may allow contaminants to be transported to ambient air above ground. There are no buildings presently located on the Property, so vapor intrusion is not currently a complete exposure pathway on the Property. For the off-Property portions of the Site, the nearest structures are either above-grade modular offices or open structures. Therefore, volatilization from soil contamination and vapor intrusion in buildings is not presently a complete exposure pathway. However, future development in areas with elevated concentrations of volatile COCs could make this pathway complete. See Section 8.2.3 for additional discussion regarding the vapor inhalation pathway.

Dissolution of soil contamination may occur due to rainwater infiltration and dissolution into migrating groundwater. Since the Site is paved and surface water drains to stormwater catch basins and sewers, minimal infiltration occurs at the Site. However, groundwater originating off site that passes through affected soil can

dissolve COCs that can then migrate with groundwater. Therefore, the soil to groundwater pathway is complete for the Site, and potential exposure pathways for groundwater are discussed in Section 8.2.2.

Surface water runoff can potentially transport COC-affected soil to stormwater, surface water, and sediment. Since the Site is paved and surface water drains to stormwater catch basins and sewers, these pathways are currently incomplete for the Site. While these represent potential exposure pathways should the on-Property cap or off-Property paving be damaged or removed, they are not considered likely under current or expected future Site conditions.

8.2.2 GROUNDWATER

Three potential mechanisms exist for transport of COCs from groundwater—volatilization from affected groundwater to subsurface vapors, transport of dissolved COCs in groundwater, and direct contact with or incidental ingestion of affected groundwater.

While volatilization is a possibility, especially in those areas with volatile aromatic hydrocarbons (such as the former ADC garage west of Federal Avenue), the only structures in these areas are above-grade modular offices or open structures. Benzene exceeds the groundwater screening level protective of indoor air of 2.4 μ g/L at LPH-1. Therefore, volatilization of COCs from groundwater is a potentially complete Site pathway. See Section 8.2.3 for additional discussion.

As noted above, COCs can dissolve in groundwater and potentially migrate to Port Gardner Bay. In 1996, groundwater infiltrated the CSO line and flowed to Port Gardner Bay. Extensive repairs were made to the CSO line in 1996, so further direct infiltration into the CSO line is unlikely. The proposed CPOC is located downgradient of the source areas, between the source areas and the Port Gardner Bay shoreline. Therefore, although Site groundwater is discharging to marine surface water, the cleanup standard would be attained prior to discharge, thereby reducing potential risks to surface water and/or sediments to acceptable levels. Therefore, this is an incomplete pathway.

A third potential exposure pathway for affected groundwater is direct contact or incidental ingestion by construction workers. During subsurface excavations in areas of affected groundwater, workers may contact groundwater, resulting in the potential for dermal absorption or incidental ingestion. Temporary worker exposure to affected groundwater is a complete exposure pathway. Potential direct exposure to affected groundwater produced from wells is considered to be unlikely, as groundwater is neither potable nor suited for industrial or commercial use, due to the proximity of the Site to Port Gardner Bay. As discussed in Section 5.2.2.1, the highest beneficial use of groundwater at the Site is discharge to marine surface waters.

8.2.3 VAPOR

Subsurface vapors could potentially transport volatile COCs from LPH, soil, or groundwater to indoor air, ambient air, excavations, or utility line backfill. Groundwater contamination by volatile Site COCs (with the exception of benzene) is below PCLs that are protective of indoor air; soil contamination in the highly affected areas may be a source of indoor air contamination. Potential vapor exposure through inhalation can affect temporary construction workers during subgrade utility work. Subsurface vapors also can accumulate inside slab-on-grade or subgrade structures or utility corridors. Currently, all Site structures are temporary, modular, above-grade offices or open-air maintenance buildings where the potential accumulation of vapors is unlikely. Based on these considerations, only inhalation by construction workers during subsurface construction work is currently considered a complete and significant potential exposure pathway.

As noted above, there are currently no slab-on-grade or subgrade buildings present over or in the vicinity of affected Site soil. However, the vapor intrusion pathway is a pathway of concern because it is possible that buildings could be constructed in the future. As noted in Section 5, the groundwater PCLs were established to be protective of indoor air, and no volatile Site COCs except benzene (in samples collected at LPH-1 and W-15R) have been detected in groundwater at concentrations exceeding PCLs based on protection of indoor air. Soil contamination in the source areas may pose a potential risk to indoor air. To address this potential future pathway, institutional controls requiring the indoor air pathway to be evaluated and addressed as part of redevelopment will be established for those parcels that contain elevated soil concentrations.

8.2.4 LIGHT NONAQUEOUS-PHASE LIQUIDS

Since completion of the BNSF excavation in 2011 and dewatering activities associated with the City of Everett utility construction activities in 2011 and 2012, LNAPL has been accumulating in sumps and wells located on and upgradient of the Property. As shown on Figure 8-2, LNAPL is present at or above residual saturation levels in several locations. Note that the soil characterization results from Cardno's (2021) investigation described in Section 3.2.4 are not shown on Figure 8-2; the results from Cardno's investigation are presented in Appendix F and figures in the DCAP. Temporary construction workers could be exposed to LNAPL through ingestion or direct dermal contact when soils are removed during subsurface excavations, other excavation in affected areas, or repair or replacement of utilities or remedial activities. For these reasons, exposure to LNAPL by construction workers through direct exposure is a complete potential exposure pathway.

8.2.5 STORMWATER

The surface of the Property is capped, and the surface of the remaining portions of the Site is paved. Stormwater flows to the catch basins located on the Property and in other portions of the Site. The cap and surface pavement effectively prevent stormwater from contacting affected soil or groundwater. Management of stormwater in subsurface sewer lines significantly reduces the potential for human or ecological contact with stormwater runoff. For these reasons, there is no complete potential exposure pathway related to Site stormwater runoff.

8.2.6 SURFACE WATER

The only potentially complete exposure pathway to surface water is groundwater discharging to Port Gardner Bay. However, discharge of groundwater to surface water and/or associated impacts have not been observed. While there is likely discharge of groundwater to marine surface water, dissolved COCs may naturally attenuate prior to reaching surface water. Any COCs present in groundwater discharging to surface water may result in exposure to ecological receptors via direct contact or ingestion and to human receptors via direct contact (dermal absorption or incidental ingestion) or by ingestion of aquatic organisms. Since Site COCs are attenuating prior to groundwater discharge to surface water, this pathway is incomplete.

8.3 CONCEPTUAL SITE MODEL SUMMARY

The CSM is presented on Figure 8-1 and includes the site boundary based on the extent of soil or groundwater exceeding preliminary cleanup levels. Note that the soil characterization results from Cardno's (2021) investigation described in Section 3.2.4 are not shown on Figure 8-1 and were not used to determine the Site boundary; the results from Cardno's investigation are presented in Appendix F and figures in the DCAP. This section summarizes the information provided in the preceding sections to show how the Site geology, fill history, hydrogeology, and nature and extent of contamination in soil and groundwater will determine the design of remedial alternatives.

- The shallow saturated zone on the Property east of Federal Avenue generally consists of fine-grained soils
 and is characterized by silty sands, silts, peat, and minor amounts of coarser sand at depth. This portion of
 the Site was originally a marshy, low-lying area prior to development, accounting for the presence of
 subsurface peat.
- The area west of Federal Avenue consists primarily of filled materials; the fill materials emplaced to extend the shoreline to the west generally consist of silty sands and well-graded to poorly graded sands.
- Groundwater within the finer grained sediments east of Federal Avenue has a steeper hydraulic gradient than groundwater in the more permeable fill materials west of Federal Avenue.
- Groundwater flows from the east to the west across the Site. The groundwater surface approaches the land surface east and northeast of the Property, as shown by the presence of seeps along the base of the Terminal Avenue Overpass and near the railroad right-of-way. This surface discharge is partially due to the finer grained, lower permeability soils in this area that restrict groundwater flow and cause groundwater levels to rise until it starts discharging to the surface.

- The gradual filling and extension of the shoreline to the west of Federal Avenue has lengthened the groundwater flow path before it eventually discharges to Port Gardner Bay. The longer flow path has caused groundwater levels to rise in areas upgradient of the pre-development shoreline, which was located just west of Federal Avenue.
- TPH-D and TPH-O or oil hydrocarbons in soil dominate COCs on the Property and the area to the east, under the Terminal Avenue Overpass. These hydrocarbons are found at concentrations suggesting that they are present in the soil at residual saturation or as limited areas of LPH. This contamination beneath the Terminal Avenue Overpass may be an ongoing source for releases to groundwater and/or soil, and this area cannot be excavated or otherwise remediated due to the presence of the overpass structure and foundation.
- TPH-G in soil is primarily found near the former ADC garage area west of Federal Avenue.
- Residual concentrations of COCs in soil are also located beneath Former Everett Avenue and Federal Avenue.
- Hydrocarbons released to subsurface soils prior to extension of the predevelopment shoreline to its current
 location would have flowed downward through the soil to pool on the water table as it existed historically. As
 the water table rose due to extending the shoreline, at least a portion of these hydrocarbons would have been
 trapped below the rising water table in residual saturation.
- Groundwater flowing through the hydrocarbon-affected soils can dissolve the more soluble portions of the trapped hydrocarbons, causing these dissolved constituents to migrate downgradient, and resulting in increased average molecular weight of the hydrocarbons left behind.
- Dewatering for construction is meant to lower the water table to stabilize soils in an excavation. Lowering the water table can allow hydrocarbons trapped in the soil at concentrations exceeding residual saturation levels to pool and begin moving in the direction of the induced gradient toward the area being dewatered. This phenomenon was observed in the engineered fill in the former BNSF excavation, where LPH was observed a few months after dewatering by the City of Everett in 2012.
- The complete potential exposure pathways are:
 - **Soil:** direct exposure, volatilization to subsurface vapor, dissolution into groundwater, and contact with COC-affected soil in stormwater, surface water, and sediment;
 - **Groundwater:** volatilization from affected groundwater to subsurface vapors, transport of dissolved COCs in groundwater, and direct contact with or incidental ingestion of affected groundwater;
 - **Vapor**: inhalation by construction workers during subsurface construction work and potentially vapor intrusion into future buildings that may be constructed at the Site; and
 - LNAPL: ingestion or dermal contact.

Volatilization into soil vapor and then vapor intrusion into an occupied building is a potential route of exposure that may be applicable in the future. However, all existing buildings at the Site are above-grade buildings that are open or have well-ventilated crawlspaces, so at present there are no complete volatilization exposure routes. If new buildings are constructed within Site source areas, the possibility of future vapor intrusion would need to be considered and addressed.

Lastly, any remedial alternative that lowers the permeability of soil (through use of a barrier or low-permeability material such as controlled density fill) should account for the possibility of groundwater mounding on the upgradient side. This mounding could cause groundwater to flow onto the surface and may potentially cause LPH to seep to the surface, along with groundwater.

9 REMEDIAL ACTION OBJECTIVES

The RAOs are Site-specific goals established to protect human health and the environment and must be achieved by remedial alternatives considered for evaluation in the FFS. The RAOs provide a general framework, along with other requirements specified in the MTCA regulations, for developing and evaluating remedial action technologies and alternatives. The preliminary RAOs that have been identified for the FFS are:

- Prevent COCs from migrating off Site from source areas.
- Prevent contaminated soil containing concentrations of COCs above soil cleanup levels from becoming
 airborne or waterborne and impacting surface water or sediment in the East Waterway (via dust migration,
 leaching into soil, or stormwater runoff).
- Reduce the potential for COCs to leach from Site soil to groundwater.
- Remove LPH to the maximum extent practicable.
- Prevent future migration of residual LPH (after removal to the extent practicable) at the Site.
- Reduce the potential for the dissolved-phase groundwater plume to expand downgradient toward the East Waterway via diffuse groundwater flow or through utility corridors and discharge to surface water and sediment in the East Waterway.
- Prevent vapor intrusion into current or future buildings on the Site above indoor air cleanup levels from volatile COCs in soil and groundwater.
- Prevent direct human contact (dermal and incidental ingestion) and inhalation exposure to contaminated soil and groundwater above the cleanup levels.
- Attain cleanup standards in soil and groundwater by achieving cleanup levels at the applicable POCs within a reasonable restoration time frame and in accordance with MTCA regulations.

It is expected that cleanup levels for groundwater will be attained at an off-Property CPOC.

10 REMEDIATION CONSIDERATIONS

The remediation alternatives considered in the FFS must be designed to address applicable or relevant regulations and requirements as specified in the MTCA regulations. Additionally, there are several Site-specific factors that constrain and/or otherwise affect Site remediation. These considerations are described below.

10.1 APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS

Several regulations will apply to Site remediation. The alternatives considered in the FFS must address these requirements. The applicable regulatory requirements are summarized in Sections 10.1.1 through 10.1.8.

10.1.1 MTCA REQUIREMENTS

The MTCA cleanup regulations provide that a cleanup action must comply with cleanup levels for identified COCs, POCs, and applicable or regulatory requirements, based on federal and state laws (WAC 173-340-710).

10.1.2 STATE ENVIRONMENTAL POLICY ACT

The Washington State Environmental Policy Act (SEPA) (RCW 43.21C), State implementing rules (WAC 197-11), and City of Everett regulations may apply to cleanup actions that may affect the environment. SEPA applies to cleanup actions that may affect the environment, and MTCA cleanup actions are not exempt from SEPA procedures. Ecology is required to complete a SEPA checklist to determine if a proposed cleanup action will or will not have a significant adverse impact on the environment. If Ecology determines that there is no significant impact, Ecology issues a Determination of Non-significance or a mitigated Determination of Non-significance with conditions.

10.1.3 CONSTRUCTION STORMWATER GENERAL PERMIT

A stormwater, grading, and drainage permit will be required prior to any earthwork that will result in excavation that is deeper than 3 feet and/or disturbs more than 100 cubic yards (CY) of soil. This permit will specify the excavation protection (shoring) methods and temporary erosion and sedimentation controls to be used during remedial actions.

10.1.4 OTHER POTENTIALLY APPLICABLE REGULATORY REQUIREMENTS

Other regulatory requirements must be considered in the selection and implementation of the cleanup action. MTCA requires the cleanup standards to be "at least as stringent as all applicable state and federal laws" (WAC 173-340-700[6][a]). Besides establishing minimum requirements for cleanup standards, applicable federal, state, and local laws and ordinances also may impose certain technical and procedural requirements for performing cleanup actions. These requirements are described in WAC 173-340-710.

10.1.4.1 National Recommended Water Quality Criteria

The National Recommended Water Quality Criteria (NRWQC) are federally promulgated water quality criteria. These standards are referenced in the MTCA regulations (WAC 173-340-730 [3][b]) as applicable federal standards and are based on human health. Of the Site COCs, NRWQC are listed only for benzene and total cPAHs. The NRWQC for these two COCs were considered for establishing the PCLs for groundwater at this Site. Other ARARs applicable to protection of surface water were identified in Section 5.2.2.2.

10.1.4.2 Native American Graves Protection and Repatriation Act

The Native American Graves Protection and Repatriation Act is codified at 25 United States Code (USC) 3001 through 3113 (43 CFR 10) and Washington's Indian Graves and Records Law (RCW 27.44). These statutes, or local variations, prohibit the destruction or removal of Native American cultural items and require written notification

of inadvertent discovery to the appropriate agencies and Native American tribes. Because the general waterfront area has been occupied, or otherwise used, by Native American tribes, remediation activities could uncover artifacts. Requirements for these laws and regulations must be addressed as part of design and implementation of the selected Site remedy.

10.1.4.3 Archaeological Resources Protection Act

The Archaeological Resources Protection Act (16 USC 470aa et seq.) and the federal regulations issued pursuant to this law (43 CFR 7) are potentially applicable requirements. This federal program, and any similar state and/or local programs, set forth requirements that are triggered when archaeological resources are discovered. These requirements will apply only if archaeological items are discovered during implementation of the selected remedy.

10.1.4.4 Washington Dangerous Waste Regulations

The dangerous waste requirements (WAC 173-303) potentially apply to the identification, generation, accumulation, and transport of hazardous/dangerous wastes at the Site during remediation and monitoring. These standards are applicable to any soil or monitoring wastes that are taken off Site for disposal that have concentrations of COCs that exceed Washington Dangerous Waste criteria.

10.1.4.5 Washington Solid Waste Handling Standards

The solid waste management regulations (WAC 173-350) establish minimum standards for handling and disposal of solid waste. They are applicable for Site activities, including remediation and monitoring, that generate solid waste, the definition of which includes affected soils, affected groundwater, investigation-derived waste, construction and demolition wastes, and garbage. The standards require that solid waste be handled in a manner that does not pose a threat to human health or the environment, and that complies with local solid waste management rules and applicable water and air pollution controls.

10.1.5 WASHINGTON INDUSTRIAL SAFETY AND HEALTH ACT REGULATIONS

Cleanup activities will be performed in accordance with the requirements of the Washington Industrial Safety and Health Act (RCW 49.17), the federal Occupational Safety and Health Act (29 CFR 1910 and 1926), the Hazardous Waste Operations and Emergency Response (HAZWOPER) regulations (29 CFR 1901.120), and Washington General Occupational Health Standards (WAC 296-62). These applicable regulations include requirements for worker protection from physical hazards (such as improper shoring, confined space entry, and equipment hazards), and protection from exposure to hazardous substances or other deleterious materials.

10.1.6 MONITORING WELL CONSTRUCTION, MAINTENANCE, AND **DECOMMISSIONING**

Ecology enforces rules for the construction, maintenance, and abandonment of monitoring and other types of wells in Washington (WAC 173-160), excluding injection wells. To conduct soil remediation, several existing monitoring wells will be abandoned, and new monitoring wells may be installed to monitor the groundwater contamination levels after completion of the Site cleanup action.

10.1.7 AIR QUALITY

For Site grading or excavation work that could generate dust, controls would need to be in place during construction (e.g., wetting or covering exposed soils and stockpiles), as necessary, to meet the substantive restrictions for off-Site transport of airborne particulates by the local agency (the Puget Sound Clean Air Agency).

10.1.8 SHORELINE MANAGEMENT

The Washington State Shoreline Management Act and the federal Coastal Zone Management Act are implemented through the City of Everett's Shoreline Master Program. These acts establish requirements for substantial development occurring within the waters of the State of Washington or within 200 feet of a shoreline. These requirements may be relevant to Site remediation, although most work would be performed more than 200 feet

from the Port Gardner Bay shoreline. The cleanup action will be designed to comply with any applicable and substantive requirements under the City of Everett's Shoreline Master Program.

10.2 SITE-SPECIFIC CONSTRAINTS

Remediation alternatives for the Site were developed while considering the following Site-specific remediation constraints:

- Terminal Avenue Overpass: This overpass is within a City of Everett right-of-way and provides access to the Port of Everett, former KC, and BNSF properties. The project is limited by the overpass because contamination beneath and immediately adjacent to the structural features associated with the overpass (e.g., pilings/supports) cannot be safely accessed for removal by excavation, as there is significant potential for damage to the overpass structural footings and this area cannot be practicably remediated by other means.
- City of Everett Lift Station #3: The lift station is located at the east end of former Everett Avenue and northeast of the ADC Parcel. This lift station provides combined sanitary and stormwater sewer capacity; however, during large storms overflow from the lift station flows directly into Port Gardner Bay. The City of Everett requires access to this lift station for inspection of equipment, such as telemetry monitors, levels, and pumps, and for maintenance on a daily basis. For this reason, potential for removal of contamination below the access road is limited.
- **Aboveground and underground utilities:** Numerous critical utilities are located along Federal Avenue and the former Everett Avenue alignments, located both above and below the area of concern. These utilities include a 24-inch force main, two sanitary sewer lines, storm drain line, underground telephone line, and overhead electrical lines (Figure 2-16). Remediation activities within these areas are substantially limited because these services are required to keep local businesses operable.
- **KC Maintenance Building:** This building is located on the former KC property adjacent to the former Everett Avenue. Remediation in areas adjacent to the building are limited by this structure because contamination beneath the structure is not safely accessible for removal by excavation, as there is potential for damage to the slab/footings and for building settlement.
- Surrounding property access: Ongoing operations are occurring at several properties within or adjacent to the Site. Ongoing access is currently required for the Port of Everett, Dunlap Towing, and former KC properties. Maintaining access to local businesses for daily industrial activities will limit remediation efforts in some areas. Depending on the extent of contamination, excavation or construction areas will be limited to areas where access by construction equipment and personnel can be maintained while avoiding significant disturbance of business operations. Also, the project is limited to areas that are legally permissible to access.
- Site conditions: Existing Site conditions, such as the known high groundwater table or groundwater seepage from upgradient areas, may affect the maximum feasible depth of excavation. The high groundwater table or excessive seepage can affect the stability of excavation sidewalls and limit the safe depth of excavation. The high water table limited the safe depth of excavation and increased the volume of petroleum-impacted groundwater collected during the 2011–2012 excavation conducted in the area to the east of the Property.
- Non-potable groundwater: As noted in Section 5.2.2.1, groundwater present beneath the Site is not suitable
 for use as a source of potable water due to the proximity to Port Gardner Bay and the hydraulic connection
 between the groundwater and marine surface waters. The historic use of the area for disposal of refuse and
 very high potential to capture marine water from Port Gardner Bay preclude use of Site groundwater as a
 potable water source.
- Off-property constituents: The Site consists of the Property owned by ExxonMobil and ADC as well as several properties owned by other parties. The processing area that was leased by ADC is located west of Federal Avenue on property owned by the Port of Everett. Since Site constituents are present in the inaccessible areas beyond the boundary of the properties owned by ExxonMobil and ADC, an off-property CPOC is necessary for the Site because it is not practicable to meet cleanup levels throughout the entire Site within a reasonable restoration time frame.

11 REMEDIATION TECHNOLOGIES

A reasonable number and type of potentially applicable remediation technologies were evaluated in a feasibility study for this Site, which was completed in 1998 (Exponent, 1998). Based on the previous work, potentially applicable technologies were considered and presented in the FFS Work Plan (AMEC, 2013). A limited number of additional remediation technologies have been considered for this FFS. Based on the technology evaluations completed to date and discussion with Ecology, this FFS will not repeat technology screening. Instead, this FFS will proceed directly to development and evaluation of feasible remediation alternatives. Consistent with discussions and meetings with Ecology, the FFS will focus on evaluating a select number of remediation alternatives that are considered potentially feasible to address petroleum hydrocarbon impacts in soil and groundwater at the Site. This section provides a general description of the remediation technologies that have been included in the remediation alternatives that are developed and evaluated in Sections 12 and 13.

11.1 INSTITUTIONAL CONTROLS

Institutional controls limit access or use of the Site to reduce the potential for applicable receptors to be exposed to Site COCs. Institutional controls applicable to the Site include requirements to provide basic information/notification and/or measures to inform the public and those performing work within the Site about potential risks from Site COCs. Institutional controls, such as restrictive covenants and/or security systems, will be incorporated into the remediation alternatives as appropriate to preclude Site uses or activities with the potential to expose receptors to Site COCs, to restrict inadvertent access by the general public, and to mitigate any potential for vapor intrusion into potential future buildings. The technologies considered for institutional controls include perimeter fencing, signage on the fence, and restrictive covenants.

11.2 EXCAVATION AND OFF-SITE DISPOSAL

This remediation technology includes excavation of contaminated soil, characterization for waste disposal, transportation, and off-Site disposal within a permitted landfill or other appropriate disposal or treatment facility. Excavated soil would be replaced by importing and placing clean fill or utilizing treated soil generated by in situ soil stabilization. Confirmation samples are typically collected from excavations to verify removal of affected soil. This technology can be implemented to remove all affected soil or to remove areas of LNAPL-impacted soils or the known source area. This remediation method is widely used and results in permanent removal of affected soil from the Site. Contaminated soil is typically placed within an engineered landfill; contaminants are not permanently destroyed by this remediation technology.

11.3 LNAPL RECOVERY

LNAPL recovery is a technology that removes mobile, free-phase petroleum hydrocarbons that float on the groundwater surface. Recovery typically utilizes a hydraulic recovery system (such as pumping) or a skimming system to remove the mobile LNAPL LNAPL recovery systems can be implemented using wells or using recovery trenches. For both such systems, LNAPL must be removed either continuously or periodically, with either treatment or disposal of recovered fluids, which normally include water and petroleum hydrocarbons.

LNAPL recovery is not considered an applicable technology for this Site. As noted in Section 8, LNAPL present at the Site is immobile under existing conditions. The oil-recovery trench previously constructed has not been effective in recovering LNAPL. An aggressive dewatering program conducted by the City of Everett for repair of the combined sewer overflow line did recover some LNAPL, but the volume of LNAPL recovered was only 1.6% of the total volume of groundwater recovered, indicating that dewatering was a highly inefficient means to remove LNAPL. Aggressive dewatering was also performed by the City of Everett for installation of the sewer force main in 2012. Recovered groundwater did not require pretreatment prior to discharge to the publicly owned treatment works, indicating that LNAPL recovery was minimal. Our previous experience in the vicinity of the Site indicates

that LNAPL recovery has been ineffective and inefficient; therefore, LNAPL recovery will not be included in the remediation alternatives considered in this FFS.

11.4 NATURAL ATTENUATION

Natural attenuation is a remediation technology that relies on natural processes—including biodegradation by indigenous organisms—to degrade contaminants that have been released to soil and groundwater. Monitored natural attenuation (MNA) has been proven at many petroleum hydrocarbon sites as an effective technology to retard, disperse, and/or degrade groundwater plume contaminants in combination with appropriate monitoring to verify its effectiveness (Ecology, 2005). Natural attenuation by indigenous organisms has also been found to be effective in remediating petroleum hydrocarbon source areas (ITRC, 2018). Ecology allows the use of natural attenuation when source removal or source control has been implemented to the extent practicable, contaminants left on Site do not pose an unacceptable threat to human health or the environment, there is evidence of natural or chemical biodegradation, and appropriate monitoring is conducted [WAC 173-340-370(7)]. Natural attenuation is considered an appropriate technology for potential implementation at the Site to address groundwater and source area remediation.

11.4.1 MONITORED NATURAL ATTENUATION

This technology is especially appropriate for petroleum hydrocarbon plumes. The depositional history of the shallow subsurface in the vicinity of the Property has resulted in a substantial level of natural organic materials in the subsurface. The high organic content of Site soils increases retardation of groundwater contaminants. The natural soil conditions at the Site are expected to provide a favorable environment for effective natural attenuation of organic constituents present in affected Site groundwater. The limited extent of the downgradient dissolved-phase plume indicates that natural attenuation is active at the Site. The Site will remain capped or covered following source area removal to limit infiltration and potential human or environmental exposures.

A groundwater monitoring well network and monitoring program are typically associated with MNA to ensure that COPC degradation is effective and that cleanup levels are attained. Ecology guidance provides technical recommendations regarding the types of monitoring parameters and analyses useful for evaluating the effectiveness of MNA (Ecology, 2005). These recommendations will be incorporated into remediation alternatives that incorporate MNA as a technology.

11.4.2 MONITORED NATURAL SOURCE ZONE ATTENUATION

Natural source zone attenuation is a relatively new remediation approach which relies upon naturally occurring processes, such as dissolution, biodegradation, and degradation by-product volatilization, to reduce the mass of LNAPL and Site COCs in subsurface source areas (ITRC, 2009, 2018). Recently developed techniques have been applied to LNAPL source areas to confirm attenuation and to assess attenuation rates. Historically, the rate of LNAPL attenuation within source zones was thought to be controlled solely by electron-acceptor-mediated biodegradation, with a degradation rate less than 50 gallons of hydrocarbon per acre per year. However, recent measurements of attenuation of source area LNAPL suggest that source area depletion also occurs by anaerobic biodegradation and vapor transport processes. Reported depletion rates for petroleum hydrocarbons range from 300 to 7,700 gallons per acre per year (Garg et al., 2017). It has also been found that the presence of groundwater in conjunction with LNAPL has a substantial role in natural attenuation processes (ITRC, 2009).

Depletion rates for source zone attenuation can be used to compare estimated remediation time frames for this technology. The depletion rate is generally determined by estimating the LNAPL flux associated with the following three mechanisms (Mackay et al., 2018):

- 1. Dissolution: Estimate the mass flux of dissolved hydrocarbon to groundwater downgradient of the source
- 2. Biodegradation: Estimate the LNAPL depletion associated with both aerobic (i.e., electron-acceptor-mediated) and anaerobic (i.e., electron-donor-mediated) biodegradation using appropriate characterization data, stoichiometry, and local groundwater chemistry data.

3. *Vapor transport*: Estimate LNAPL depletion due to volatilization by monitoring the release of gaseous biodegradation by-products (e.g., carbon dioxide and methane) within or above the source zone and estimating various properties of the media to estimate the volatilization rate for the entire source zone.

Regulatory policies regarding source zone attenuation have been changing in many states. Natural source zone attenuation has been used as an acceptable remedial approach at sites in several states, such as the Guadalupe Oil Field in California (ITRC, 2009), the Bemidji site in Minnesota (Essaid et al., 2011), and the BNSF Midland Market Railyard in Oregon (Oregon DEQ, 2014).

Natural source zone attenuation is considered an appropriate remedial technology for the Site for several reasons. As discussed previously, much of the LNAPL and affected soil within the Site source areas is below the water table, a condition that supports natural source zone attenuation. The potential rate of LNAPL removal associated with natural source zone attenuation reported in previous studies (up to thousands of gallons per acre per year) exceeds the volume of LNAPL recovered historically from remediation activities conducted at the Site, as noted in Table 6-2. Higher removal rates were only achieved during the CSO dewatering work conducted in 1996. Site TPH and LNAPL have been highly weathered, likely due to natural attenuation processes that are active at the site (Section 6.4). Additionally, a substantial portion of the Site LNAPL source area is inaccessible and cannot be addressed by other remediation technologies. Natural source zone attenuation is a newly recognized remediation technology that may be effective for remediation of Site contaminants from impacted areas, including the inaccessible areas. A monitoring program is typically associated with natural source zone attenuation to verify that natural source zone remediation is effective. This technology is considered an essential tool for Site remediation and will be incorporated into remediation alternatives as appropriate.

11.5 SUBSURFACE BARRIER WALL

Low-permeability barrier walls can be used to completely or partially contain source areas or areas with high levels of contamination. These barriers have been proven to be highly effective for isolating and containing both contaminated soil and contaminated groundwater. Shallow barrier walls, which would most likely be applicable to the Site, are typically constructed of a soil-bentonite mixture using the slurry wall technique. The slurry wall technique involves excavation of a trench and filling the trench with bentonite and water slurry to maintain an open excavation. The excavated soil is stockpiled alongside the trench, where it is mixed with bentonite to achieve the desired permeability. The amended backfill is then placed back into the trench as backfill, displacing the bentonite slurry and forming the barrier wall. Conventional soil-bentonite slurry walls can be readily completed to depths of about 50 feet bgs and are capable of achieving a hydraulic conductivity on the order of 10^{-7} cm/sec, which is approximately two orders of magnitude lower than the hydraulic conductivity of Site soils. Barrier walls may be keyed into a lower confining soil layer, or they may be constructed as a "hanging" wall when no lower confining unit is present. Both types of barrier walls can be effective for containing contaminated soil and/or groundwater.

11.6 PERMEABLE REACTIVE BARRIER

Permeable reactive barriers (PRBs) are used to remediate dissolved groundwater contaminants as groundwater flows through the reactive medium. They are typically constructed using reactive media that interact with groundwater contaminants that flow through the barrier wall, with the PRB medium selected to address the specific contaminants present at a given site. For TPH, an activated carbon or amended organoclay medium may be used, as these materials will adsorb dissolved TPH. The PRB medium must have a permeability higher than the surrounding saturated soils. A PRB may be used in conjunction with a low-permeability barrier wall in a "funnel-and-gate" arrangement to direct groundwater flow through the PRB. Funnel-and-gate designs require proper design to control excessive mounding on the upgradient side. PRBs are designed to provide a minimum contact time and adsorption capacity for the contaminants being addressed. Depending on the design of the PRB and the mass flux of the contaminants into the PRB, the medium may need to be replaced to address all of the dissolved-phase contamination. The medium in the PRB could also support biological activity, which would degrade adsorbed TPH over time.

11.7 IN SITU SOIL STABILIZATION

In situ soil stabilization (ISS) is accomplished by mixing a stabilization additive (typically Portland cement) to stabilize the soil and bind contaminants. Portland cement, and/or other pozzolanic materials, tightly bind to most inorganic contaminants and effectively immobilize them, thereby eliminating migration and direct exposure risks. The stabilized soil is usually friable after stabilization but has good bearing capacity and reduced permeability. For organic contaminants, such as TPH or creosote, this technology can be effective in reducing mobility if an additive, such as bentonite or organophilic clay, is added. Mixing the additives with the soil results in a volume increase (which may be in the range of 20–30%); the excess soil is typically removed from the Site to maintain the existing grade. If this technology is combined with excavation of affected soil, the stabilized soil may be used to backfill portions of the Site that have been excavated.

Soil mixing can be accomplished in situ by several methods, including use of modified augers, proprietary soil mixing heads, or conventional excavator buckets. Augers and mixing heads provide more thorough mixing than can be accomplished using a conventional excavator bucket. Thorough mixing also homogenizes the treated soil column, distributing COCs throughout the treated volume. Treatability testing is required to determine the appropriate amendment ratios. Stabilized materials are usually covered with clean soil or pavement to limit infiltration and erosion. This technology has been demonstrated to be effective for hydrocarbon sites. If treated soil is removed in the future to support development after remediation is complete, the excavated soil would not require management or disposal as dangerous waste but would require management and disposal as solid waste.

Advantages of ISS include decreased mobility of COCs due to binding of stabilized soils, decreased concentrations of COCs in treated soil due to mixing into the soil column, and slightly reduced permeability of treated soils, thus reducing the potential for migration. Additionally, site-specific admixtures can be developed and evaluated to achieve desired results. For example, increasing bentonite along the perimeter could further reduce permeability, resulting in decreased groundwater flow through the treated area. The mixing and stabilization of affected soils would also make it unlikely that vapor intrusion barriers would be necessary for future development over treated soils.

Disadvantages of ISS include the potential for excessive reduction in the permeability of treated soils (increasing the likelihood of surface seepage under some conditions) and the presence of residual COCs that remain in place after treatment. In addition, the stabilized soils would be considered solid waste by Ecology if they are excavated in the future, such as for utility or redevelopment work, requiring additional costs for handling and disposal. ISS would also hinder or inhibit the natural biodegradation of Site contaminants within the stabilized areas that is occurring under current site conditions (ITRC, 2011). This inhibition of natural biodegradation would reduce the degradation rate of COCs at the Site and extend the restoration time frame. Another disadvantage is that implementation of ISS requires a second mobilization for construction activities using specialized equipment to perform the work.

12 DEVELOPMENT OF REMEDIATION ALTERNATIVES

The objective of the FFS is to provide sufficient information to identify a preferred, comprehensive Site remediation alternative that adequately addresses Site soil and groundwater contamination and the relevant exposure pathways identified in Section 8.3. The alternatives developed for the FFS have been designed such that they can be implemented within a reasonable time frame and within the existing Site constraints, including the presence of affected media in inaccessible areas beneath and adjacent to the Terminal Avenue Overpass and along the utility rights-of-way (Section 10.2). Two groups of remediation alternatives have been developed and evaluated.

The first group of alternatives has been designed to address affected soil and groundwater within the source areas (Figure 12-1). Source areas are defined as those areas where soils affected by the operations conducted by ExxonMobil and ADC significantly exceed PCLs. Within the source areas are more limited areas defined by the presence of LNAPL-affected soil, where LNAPL has been observed or where concentrations of petroleum hydrocarbons are high enough to suggest that the hydrocarbons are present in residual saturation ("LNAPL Areas"). The LNAPL Areas occur in two portions of the Site: one includes the majority of the Property, and the other is located west of Federal Avenue on property owned by the Port of Everett in the vicinity of the former ADC garage (Figure 12-1). Figure 12-1 shows the approximate footprint of the LNAPL Area on the Port of Everett property as delineated by Cardno's (2021) investigation, as described in Section 3.2.4. Note, however, that the soil characterization results shown by symbols on Figure 12-1 do not show the sampling locations or incorporate the analytical results from Cardno's (2021) investigation. The boring locations and detailed analytical results from Cardno's investigation are presented in Appendix F and figures in the DCAP.

The *inaccessible source areas* (or inaccessible areas) are areas where soils affected by the operations conducted by ExxonMobil and ADC may exceed PCLs, but where access is not practicable for remediation construction activities. These areas include the areas beneath and adjacent to the Terminal Avenue Overpass, adjacent to the neighboring KC building, and along the utility rights of way on Federal Avenue and former Everett Avenue (Figure 12-1).

The second group of alternatives has been designed to address the areas of affected groundwater extending downgradient from the source areas, with dissolved-phase COC concentrations that are significantly lower than the COC concentrations found within the source areas. As noted in Section 6, concentrations of most of the COCs in groundwater west of Federal Avenue are lower than the PCLs. Both groups of remediation alternatives were developed and evaluated separately to provide the information necessary to identify the preferred alternative from each of the two groups (source area and affected groundwater).

The final, comprehensive Site alternative will combine the preferred alternative from each of the two groups so that both the source areas and affected groundwater are addressed effectively. All alternatives being evaluated meet both the MTCA requirements and ARARs. The recommended Site remediation alternative is presented in Section 14.

Using the remediation technologies identified in Section 11, three remediation alternatives were developed to address affected soil and groundwater within the source areas, and two alternatives were developed to address dissolved-phase COCs in downgradient groundwater.

The FFS will evaluate the following three source area remediation alternatives:

- Source Area Alternative 1: LNAPL Area Excavation and Natural Source Zone Attenuation. Excavation of
 accessible source area soils impacted by LNAPL and/or residual LNAPL saturation would occur to the
 maximum extent practicable under this alternative. Remaining source area soil exceeding PCLs and impacted
 portions of the inaccessible areas would be addressed by natural source zone attenuation.
- Source Area Alternative 2: LNAPL Area Excavation and Source Area Stabilization. This alternative would
 combine excavation of accessible source area soils impacted by LNAPL and/or residual LNAPL saturation to
 the maximum extent practicable, as described for Source Area Alternative 1, with in situ soil stabilization of
 affected soils exceeding PCLs within the source areas. Affected soils within the source areas would be treated

using an admixture of Portland cement and bentonite to immobilize remaining COCs and limit potential migration risks. Impacted areas within inaccessible areas would be addressed by natural source zone attenuation.

- Source Area Alternative 3: Source Area Excavation. This alternative consists of comprehensive excavation of accessible affected soils exceeding PCLs in the source areas to the maximum extent practicable. As noted for Alternatives 1 and 2, impacted portions of the inaccessible areas would be addressed by natural source zone attenuation.

The three remediation alternatives for the source areas all include institutional controls as appropriate to achieve remediation objectives, particularly for the inaccessible areas. In these areas, it is impracticable to treat or remove affected soil and groundwater, which would remain in place for some time. In addition, isolated exceedances of certain COCs outside the source areas and inaccessible areas do not pose unreasonable risk as they are only slightly above the PCLs and are already contained beneath existing pavement. The source area remediation alternatives are described in more detail in Section 12.1.

The FFS evaluated two remediation alternatives that focus on remediation of the dissolved groundwater plume downgradient of the source areas:

- **Groundwater Alternative 1: Monitored Natural Attenuation.** Groundwater remediation based on monitoring attenuation of groundwater COCs by intrinsic, natural processes.
- **Groundwater Alternative 2: Funnel and Gate.** Groundwater remediation using a PRB and monitoring the attenuation of groundwater COCs.

The two groundwater alternatives would address dissolved COCs and would include institutional controls and a groundwater monitoring program to fully achieve remediation objectives. The two groundwater alternatives are described in more detail in Section 12.2.

12.1 SOURCE AREA REMEDIATION ALTERNATIVES

The three remediation alternatives developed for the source areas at the Site are described in Sections 12.1.1 through 12.1.3. The two defined source areas for the Site described above are generally located (1) on the Property and (2) in the vicinity of the former ADC garage on Port of Everett property immediately west of Federal Avenue. The two source areas include areas where free LNAPL or LNAPL at concentrations at or above residual saturation is present. These areas are referred to as *LNAPL areas* and are shown on Figure 12-1. Figure 12-1 also shows the soil sampling locations where each of the Site COCs has exceeded the PCLs and demonstrates that the source areas and the LNAPL areas effectively cover the areas impacted by these constituents. Figures 12-2 through 12-4 show schematic drawings of the three source area alternatives. The areas to be addressed by each of the source area remedial alternatives effectively cover the areas with soils affected by petroleum hydrocarbons.

The source area and excavation areas shown on Figures 12-1 through 12-4 incorporate the footprint of the LNAPL Area on the Port of Everett property delineated by Cardno (2021), as described in Section 3.2.4. Note, however, that the soil characterization results shown by symbols on Figures 12-1 through 12-4 do not show the sampling locations or incorporate the analytical results from Cardno's (2021) investigation. The boring locations and detailed analytical results from Cardno's investigation are presented in Appendix F and figures in the DCAP.

The two defined source areas can be practicably remediated and include most of the areas with the highest concentrations of COCs and/or LNAPL. The inaccessible areas cannot be feasibly remediated by active measures, as any remediation would significantly impact existing infrastructure and vehicular traffic while creating undue health and safety risks for workers involved in the remediation effort, as well as the general public. In addition, serious and expansive structural concerns would have to be addressed prior to performing work adjacent to structures in these areas.

For conceptual design of the source area alternatives, it was assumed that any excavation must be set back from the base of the Terminal Avenue overpass a sufficient distance to achieve a one-to-one horizontal-to-vertical (1H:1V) ratio to minimize the potential for adverse impacts to the overpass. For example, if the excavation on the southeast side of the property adjacent to the overpass is expected to be 10 feet deep, the edge of the excavation would be set back 10 feet from the overpass. The southeast edge of the excavation would also be protected using

piling. Installation of protective measures such as shoring may allow for excavation closer to the overpass; however, further geotechnical investigation and testing would be necessary to determine an adequate approach to safely conduct the excavation. The contamination present beneath the utility corridors (former Everett Avenue and Federal Avenue) cannot be directly addressed due to the presence of utilities (both underground and overhead) and because it is the sole source of access for several active businesses. For all three alternatives, contamination remaining in these inaccessible areas would be remediated by natural source zone attenuation processes.

12.1.1 SOURCE AREA ALTERNATIVE 1: LNAPL AREA EXCAVATION AND NATURAL SOURCE ZONE ATTENUATION

This alternative entails removal of accessible soils contaminated with LNAPL or residual LNAPL saturation within the two defined source areas. Remaining COCs exceeding PCLs within source areas and inaccessible areas would be remediated by natural source zone attenuation. In this alternative, the most highly affected portions of the accessible source areas would be excavated for off-site disposal. The excavation areas shown on Figure 12-2 are based on currently available analytical data. The source area and excavation areas shown on Figure 12-2 incorporate the approximate footprint of the LNAPL area on the Port of Everett property delineated by Cardno (2021), as described in Section 3.2.4. Note, however, that the soil characterization results shown by symbols on Figure 12-2 do not show the sampling locations or incorporate the analytical results from Cardno's investigation. The results from Cardno's investigation are presented in Appendix F and figures in the DCAP.

Based on Site investigation data, five different excavation areas have been defined with different excavation depths. The excavation depths are based on Site investigation boring logs, which are included in Appendix B, and the delineation by Cardno (2021) presented in Appendix F and figures in the DCAP. For the excavations on the Property, additional site characterization data may be collected for final design if this alternative is selected for implementation. The areas beneath the Terminal Avenue Overpass and areas within a 1H:1V setback from the overpass are not included for excavation under this remedial alternative due to potential structural issues for the overpass. The excavation areas shown on Figure 12-2 on the Property may change during final design, based on additional design data collected and/or provisions to protect the structural integrity of the overpass and adjacent roadways; the excavation area shown on Figure 12-2 on the Port of Everett property has been delineated by Cardno (2021) and would not change during final design if this alternative is selected for implementation.

For conceptual design of this alternative, it was assumed that remedial activities would be conducted in the following sequence:

- 1. Excavate soils containing LNAPL and/or residual LNAPL saturation.
- 2. Backfill the excavation.
- 3. Pave/cap and restore the final surface.
- 4. Implement natural source zone attenuation monitoring for the remaining source area soils and the inaccessible areas.

For the FFS, it was assumed that the excavated soil would be disposed of off Site as impacted soil.

It was assumed that the LNAPL area excavation would be conducted as open excavations in the areas shown on Figure 12-2. To the maximum extent practicable, excavation would be performed without groundwater removal. Temporary shoring using sheet piling was assumed to allow excavation to the depths shown on Figure 12-2 and is necessary to protect the City of Everett Force Main sewer to the north, the Overpass to the east, and Federal Avenue to the west (i.e., the inaccessible areas). The temporary shoring would be removed upon completion to allow normal groundwater flow. For excavation areas not along public rights-of-way, the perimeter of the excavation would be sloped at an angle determined by a competent person based on results of soil testing and analysis. For conceptual design of this alternative, it was assumed that the side slopes would be sloped at a 1:1 ratio.

Figure 12-2 shows the approximate limits of the side-slope excavations and shoring used for conceptual design and cost estimates. Final shoring and sloping plans and requirements will be presented in the Engineering Design Report (EDR) to be prepared later. For this alternative, it was assumed that approximately 880 linear feet of shoring along public rights-of-way would be needed to the approximate depth of 30 feet, representing

approximately 26,200 vertical square feet of sheet pile shoring. The temporary shoring would be removed upon completion to allow normal groundwater flow. Side-slope soils excavated along boundaries that are not expected to exceed PCLs were assumed to be reused as backfill. Side-slope soils excavated along boundaries expected to exceed PCLs were assumed to be disposed with LNAPL-impacted soil.

Excavation will be performed as dredging, with minimal groundwater removal. Groundwater will be removed if necessary to achieve the following objectives: (1) prevent groundwater from overtopping the excavation, and (2) remove LNAPL from groundwater within the excavation. LNAPL may be removed from the surface of the groundwater within the excavation as it is performed using methods such as skimming from the water surface using a vacuum truck or using absorbent booms/pads. Due to the depth to groundwater in the excavation areas (generally 2-5 feet bgs), groundwater recovery to prevent groundwater from overtopping the excavation will likely not be necessary. LNAPL will be removed from the surface of groundwater within the excavation prior to placement of backfill. Recovered groundwater will either be treated on site and discharged to the City of Everett publicly owned treatment works or temporarily stored in on-site tanks for off-site disposal. Final dewatering plans and requirements will be presented in the EDR.

The LNAPL Area excavation is expected to generate approximately 31,000 tons of impacted soil, which would be transported to an off-site landfill for disposal. Due to the potential for mobilization of LNAPL from inaccessible areas during excavation, provisions would be needed for LNAPL recovery and disposal during the excavation work. Based on past experience during the interim action to the east of the Property, it was assumed that approximately 1,000 gallons of LNAPL may be recovered during this excavation. It was assumed that the recovered LNAPL would be transported to a commercial facility for disposal.

It was assumed that the excavations would be left open and undisturbed for two to three days after completing excavation work to allow LNAPL that might have been mobilized due to excavation activities to collect and be recovered prior to commencing backfill. The conceptual design for this alternative assumes that the excavations would be backfilled with crushed rock. The backfill material placed below the water table was assumed to be similar to City of Seattle Standard Specifications for Road, Bridge, and Municipal Construction ("Seattle Standard"; City of Seattle, 2017) Mineral Aggregate Type 13, and the backfill material placed above the water table to within 10 inches from the finish grade was assumed to be a finer crushed rock, such as Seattle Standard Mineral Aggregate Type 17. Although low concentrations of dissolved-phase COCs will remain in groundwater within the excavation areas, recent groundwater sampling of source area wells indicates that these low COC concentrations will not cause any significant contamination of backfill material. It was assumed that a 6-inchthick layer of pavement subgrade would be placed above the crushed rock backfill, followed by 4 inches of asphalt pavement. The paved surface would be graded to restore current drainage patterns. The paved surface would also serve as a protective cap. These backfill specifications were used for costing purposes; the final backfill material and specifications will be presented in the EDR.

Under this alternative, impacted soils would remain in the inaccessible areas and in the source areas beyond where soils with LNAPL and/or residual LNAPL saturation were removed. The weathered LPH currently present at the Site preferentially adsorbs to peat, wood waste, and other organic constituents present in the subsurface, which limits the mobility of LPH during natural source zone attenuation. Therefore, the restoration time for this alternative is expected to be the time required for LNAPL within these areas to become sufficiently weathered so it is permanently immobile (i.e., so that LNAPL cannot be mobilized due to excavation or induced changes in the water table).

The inaccessible source areas would be remediated by natural source zone attenuation. The COC degradation rate would be determined by measuring the gaseous release of carbon dioxide, methane, and other biodegradation byproducts from the vadose zone. The natural source zone attenuation rate would be monitored at four different locations (plus one duplicate at one location) to produce an average value for the entire site. It was assumed that the natural source zone attenuation rate would be monitored annually for the first 5 years after active remediation, and then biannually for the following 20 years. The natural source zone attenuation rate would be used to estimate the quantity of LNAPL remaining in inaccessible areas, and the restoration time for the site. Natural source zone attenuation monitoring methods would not involve significant ground disturbance, therefore would be feasible in most inaccessible areas.

Institutional controls would supplement active remediation performed under Source Area Alternative 1 so that the alternative is protective of human health and the environment. Environmental covenants would establish

requirements for soil management, groundwater recovery or use, and building construction conducted over the source areas within the Site. The environmental covenants would address the Property and the portions of the Site located on the Port of Everett and KC properties where soil or groundwater exceeding PCLs would remain. Landowners for these properties will be consulted to obtain their consent to proposed environmental covenants on their properties as part of the DCAP. The City of Everett will also be consulted to ensure proposed environmental covenants are consistent with current and future land-use plans.

Additionally, risk management planning has been included in this alternative to mitigate potential future safety risks that Site COCs may present to workers (either public works or private contractors) conducting subsurface work within or adjacent to the inaccessible areas (Federal Avenue, former Everett Avenue, and the overpass) where COCs may remain in place. Work conducted within these areas also may result in recovery of impacted soil, impacted groundwater, or LNAPL. ExxonMobil/ADC would prepare and implement a Risk Management Plan (RMP) that would establish procedures and plans to maintain worker safety and establish protocols for proper management and disposal of media affected by LNAPL and other Site COCs in these areas. The RMP would establish a general framework for third parties performing work to mitigate risks in a manner appropriate for the specific work to be performed.

Institutional controls would be implemented to achieve the following objectives:

- Limit future use of the Property to industrial or commercial uses.
- Prohibit recovery and use of groundwater from the Site unless it is adequately treated.
- Require appropriate management of soils and groundwater recovered from the areas within the two defined
 Site source areas that were not excavated under this alternative. Excavated soils and groundwater from
 possible future subsurface construction work must be managed as waste and require treatment or disposal in
 accordance with solid and dangerous waste regulations.
- Require appropriate health and safety plans for any subsurface work and require appropriate training for construction workers conducting subsurface work within the two defined source areas and portions of the plume where cleanup levels are exceeded.
- Require permanent buildings constructed within the source areas to incorporate vapor barriers to limit potential migration of affected soil vapor into buildings.
- Require that soil vapor discharges not cause violations of applicable ambient air quality standards for Site COCs.

Institutional controls would also include access agreements with neighboring landowners as appropriate to allow access to and maintenance of monitoring wells included in the long-term monitoring program.

The restoration time frame for this alternative is expected to be determined by the COC degradation rate in the inaccessible areas resulting from natural source zone attenuation. The restoration time frame is estimated to be either the time required for inaccessible areas to be degraded to PCLs or the time required for residual COCs within inaccessible areas to become sufficiently degraded so that remaining Site constituents are permanently immobile (i.e., so that COCs cannot be mobilized due to induced changes in the water table or excavation at or near the impacted location). It is difficult to estimate how much time would be required to achieve this level of weathering or degradation. For this FFS, it has been assumed that it would occur within 50 years, considering that storage and transfer of petroleum and petroleum products began as early as 1920, and LNAPL is largely immobile under existing conditions.

12.1.2 SOURCE AREA ALTERNATIVE 2: LNAPL AREA EXCAVATION AND SOURCE AREA STABILIZATION

This alternative includes removal of soils impacted by LNAPL and/or residual LNAPL saturation within the LNAPL Areas combined with ISS for remaining accessible source area soils that exceed PCLs. The COCs remaining within the inaccessible areas would be remediated by natural source zone attenuation. The soil excavation areas in this alternative are identical to those for Alternative 1. The most highly affected portions of the source areas would be excavated, and COCs in remaining source area soils would be treated using ISS to reduce mobility under this alternative. As described for Alternative 1, there are five excavation areas with different excavation depths. The

excavation depths are based on the boring logs from Site characterization, which are included in Appendix B, except for the excavation on the Port of Everett property, which is based on Cardno's (2021) excavation area delineation presented in Appendix F and figures in the DCAP. The excavation assumptions described for Alternative 1 in Section 12.1.1 were used for excavation design for this alternative. The remaining impacted soil within the defined source areas would be remediated using ISS.

The areas shown on Figure 12-3 were used for conceptual design of this alternative. The source area and excavation areas shown on Figure 12-3 incorporate the footprint of the LNAPL area on the Port of Everett property delineated by Cardno (2021), as described in Section 3.2.4. Note, however, that the soil characterization results shown by symbols on Figure 12-3 do not show the sampling locations or incorporate the analytical results from Cardno's investigation are presented in Appendix F and figures in the DCAP. Additional characterization data may be collected for final design on the ExxonMobil/ADC Property if this alternative is selected for implementation; the excavation area shown on Figure 12-3 for the Port of Everett property has been delineated by Cardno (2021) and would not change during final design if this alternative is selected for implementation. The areas beneath and within a 1H:1V setback from the Terminal Avenue Overpass were not included for excavation under this remedial alternative due to potential structural issues for the overpass, as described in Section 12.1.1.

For conceptual design of this alternative, it was assumed that remediation activities would be conducted in the following sequence:

- 1 excavation of LNAPL Areas;
- 2. ISS of impacted soil in the source area;
- 3. backfilling the excavation;
- 4. placement of surface pavement;
- 5. final work area restoration; and,
- 6. monitoring inaccessible areas for natural source zone attenuation.

For the FFS, it was assumed that LNAPL area soil would be excavated in open excavations. Figure 12-3 shows the approximate limits of the side slope excavations used for the conceptual design and cost estimate. Final shoring and sloping plans and requirements will be presented in the EDR. The conceptual design for excavation, soil disposal, groundwater management, and LNAPL recovery under this alternative is the same as described in Section 12.1.1 for Source Area Alternative 1.

During the two- to three-day period when the excavation would be open and left undisturbed, ISS of soil outside the source area excavations would occur. For conceptual design of ISS for this alternative, it was assumed that stabilization would extend to a depth of 10 feet bgs and that a stabilization recipe of 10% dry weight Portland cement and 1% dry weight bentonite mixed with the Site soils would be used. The total amount of bentonite to be added is estimated at 58 tons, and the quantity of Portland cement is estimated to be 580 tons for conceptual design of this alternative. For final design, treatability testing would be performed to determine the appropriate stabilization recipe to achieve effective stabilization and immobilization of COCs, the appropriate swell volume for Site soils, and the curing curve (for quality control purposes). It was also assumed that a specially designed, proprietary mixing head and admixture feed equipment would be used to inject and mix the amendments in situ.

Stabilization of the impacted source area soil is expected to cause soil expansion. For conceptual design, it was assumed that the stabilized soil volume would expand vertically by 3 feet, which corresponds to 1,000 CY of stabilized soil. It was assumed that any stabilized soil in excess of what is required to maintain the existing grade would be placed within the excavated LNAPL Areas, thereby reducing backfill requirements.

Following implementation and curing of soil stabilization, the excavations would be backfilled using the excess volume of stabilized soil and crushed rock. It was assumed that all of the 1,000 CY of the excess stabilized soil would be used as backfill, and 29,000 tons of imported crushed rock would be required to backfill the remaining excavation areas. Excavation backfill material, subgrade placement, and asphalt surface would be the same as described in Section 12.1.1 for Alternative 1. The final backfill material and specifications will be presented in the EDR. Areas remediated by ISS would be graded and paved as described for the excavation areas. The paved surface would also serve as a protective cap.

Inaccessible source areas would be remediated by natural source zone attenuation, as described in Section 12.1.1 for Alternative 1.

Institutional controls would supplement the active remediation performed under Source Area Alternative 2 so that the alternative is protective of human health and the environment. Environmental covenants would be used to establish requirements for soil management, groundwater recovery or use, and building construction conducted over the source areas within the Site. The environmental covenants would address the Property and the portions of the Site located on the Port of Everett and KC properties where soil or groundwater exceeding PCLs would remain, as described for Source Area Alternative 1 in Section 12.1.1. The RMP described in Section 12.1.1 for Alternative 1 would also be included in this alternative to ensure the alternative is protective of workers conducting subsurface work on the adjacent areas.

Institutional controls would be implemented to achieve the following objectives:

- Limit future use of the Property to industrial or commercial uses.
- Prohibit recovery and use of groundwater from the Site without adequate treatment.
- Require that soils and groundwater recovered from the two defined Site source areas during possible future subsurface construction would be managed as waste and require treatment or disposal in accordance with solid and dangerous waste regulations.
- Require appropriate health and safety plans for any subsurface work and require appropriate training for construction workers conducting subsurface work within the two defined source areas and portions of the plume where cleanup levels are exceeded.
- Require permanent buildings constructed within the source areas to incorporate vapor barriers to limit potential migration of affected soil vapor into buildings.
- Require soil vapor discharges not cause violations of applicable ambient air quality standards for Site COCs.

Institutional controls would also include access agreements with neighboring landowners as appropriate to allow access to and maintenance of monitoring wells included in the long-term monitoring program.

The restoration time frame for this alternative is expected to be determined by the COC degradation rate in the inaccessible areas under natural source zone attenuation. The restoration time frame is estimated to be either the time required for COCs in inaccessible areas and source areas to be degraded to PCLs or the time required for residual COCs within inaccessible areas to become sufficiently degraded so that remaining Site constituents are permanently immobile (i.e., so that COCs cannot be mobilized due to induced changes in the water table or excavation at or near the impacted location). It is expected that ISS of source area soil would inhibit and slow the natural degradation of Site COCs, potentially increasing restoration time. It is difficult to estimate how much time would be required to achieve this level of weathering or degradation. For this FFS, it has been assumed that it would occur within 50 years, considering that storage and transfer of petroleum and petroleum products began as early as 1920, and LNAPL is largely immobile under existing conditions. However, because of the uncertainty about the degree to which ISS could impede natural attenuation of stabilized COCs, a 15% contingency has been added to the operations and maintenance cost estimate for Alternative 2 versus a 10% contingency for Alternative 1.

12.1.3 SOURCE AREA ALTERNATIVE 3: SOURCE AREA EXCAVATION

This alternative is similar to Alternative 1, except that soils exceeding PCLs (including LNAPL Areas) within both source areas would be excavated for off Site disposal (Figure 12-4). The depths of the excavation vary across the site and are shown on Figure 12-4. The source area and excavation areas shown on Figure 12-4 incorporate the approximate footprint of the LNAPL area on the Port of Everett property delineated by Cardno (2021), as described in Section 3.2.4. Note, however, that the soil characterization results shown by symbols on Figure 12-2 do not show the sampling locations or incorporate the analytical results from Cardno's investigation. The results from Cardno's investigation are presented in Appendix F and figures in the DCAP. The excavation depths are based on the boring logs from Site characterization, which are presented in Appendix B. Additional characterization data may be collected for final design on the ExxonMobil/ADC Property if this alternative is selected for implementation. However, the extent of excavation on the Port of Everett property is based on

Cardno's (2021) excavation area delineation presented in Appendix F and figures in the DCAP and will not change in final design. The inaccessible areas are not included for excavation under this remedial alternative due to potential structural issues for existing infrastructure and access issues on public streets, as described in Section 12.1.1 for Alternative 1. Remaining COCs within inaccessible areas would be remediated by natural source zone attenuation.

For conceptual design of this alternative, it was assumed that the sequence of activities would be: excavation of the source area, backfilling the excavation, placement of surface pavement, final work area restoration, and natural source zone attenuation monitoring for inaccessible areas. It was assumed that the excavated soil would be disposed of off Site as impacted soil.

It was assumed that the excavations would be conducted as open excavations in the areas shown on Figure 12-4. To the maximum extent practicable, excavation would be performed without groundwater removal. Final dewatering plans and requirements will be presented in the EDR. Temporary shoring using sheet piling was assumed to allow excavation to the depths shown on Figure 12-4 and is necessary to protect the City of Everett Force Main sewer to the north, the Overpass to the east, and Federal Avenue to the west (i.e., the inaccessible areas). For excavation areas not along public rights-of-way, the perimeter of the excavation would be sloped to stabilize the side walls of the excavation. For conceptual design of this alternative, it was assumed that unshored sidewalls would be sloped at a ratio of 1:1 and that all soils excavated for side slopes would be reused as backfill. Figure 12-4 shows the approximate limits of the side-slope excavations and shoring used for conceptual design and cost estimates. Final shoring and sloping plans and requirements will be presented in the EDR. For the configuration shown in Figure 12-4, it was assumed that an estimated 1,200 linear feet of shoring would be needed to the approximate depth of 30 feet, or approximately 36,000 vertical square feet of shoring. The temporary shoring would be removed upon completion to allow normal groundwater flow. The conceptual design for soil disposal, groundwater management, and LNAPL recovery under this alternative is the same as described in Section 12.1.1 for Source Area Alternative 1.

Based on the conceptual design for this alternative, approximately 35,000 tons of soil would be excavated for off-Site disposal. Due to the subsurface disturbances during excavation work, LNAPL may be mobilized adjacent to the excavation. Provisions would be needed for LNAPL recovery and disposal during the excavation work. Based on past experience during the interim action to the east of the Property, an estimated 1,200 gallons of LNAPL may be recovered from the source area excavation. Backfill and surface restoration would be done as described in Section 12.1.1 for Source Area Alternative 1. The final backfill material and specifications will be presented in the EDR.

Inaccessible source areas would be remediated by natural source zone attenuation as described for Alternative 1 in Section 12.1.1.

Institutional controls would supplement the active remediation performed under Source Area Alternative 3 so that the alternative is protective of human health and the environment. Environmental covenants would be used to establish requirement for groundwater recovery or use within the Site. The environmental covenants would address the Property and the portions of the Site located on Port of Everett and KC properties where soil or groundwater above cleanup levels would remain, as described in Section 12.1.1 for Source Area Alternative 1. The RMP described in Section 12.1.1 for Alternative 1 would also be included in this alternative to ensure the alternative is protective of workers conducting subsurface work on the adjacent areas.

Institutional controls would:

- Limit future use of the Property to industrial or commercial uses.
- Prohibit recovery and use of groundwater from the Site unless it is adequately treated.
- Require inspection and maintenance of the surface pavement over the source areas.

Institutional controls would also include access agreements with landowners as appropriate to access and maintain monitoring wells included in the long-term monitoring program.

The restoration time frame for this alternative is expected to be similar to Alternative 1, as discussed in Section 12.1.1.

12.2 GROUNDWATER REMEDIATION ALTERNATIVES

Two remediation alternatives for groundwater have been identified, as illustrated on Figure 12-5. Groundwater Remediation Alternative 1 could be combined with any of the source area alternatives to provide a comprehensive remedy addressing the entire Site. Groundwater Alternative 1 utilizes MNA to achieve the cleanup standard for the groundwater plume downgradient of the source areas. Groundwater Alternative 2 includes active removal of the dissolved-phase contaminants passing through a PRB in addition to MNA for remediation of the groundwater plume. The selected groundwater remediation alternative would be implemented in conjunction with the selected source area remediation alternative. A description of the two groundwater remediation alternatives is provided in Sections 12.2.1 and 12.2.2.

12.2.1 GROUNDWATER ALTERNATIVE 1: MONITORED NATURAL ATTENUATION

Groundwater Alternative 1 incorporates MNA to address groundwater contamination within the plume downgradient of the source areas. Available data for groundwater indicate that Site COCs in groundwater are effectively attenuating under existing conditions as groundwater flows to the west, through the Port of Everett property (Section 6.4). Analytical results from three monitoring wells near the shoreline of Port Gardner Bay (MW-A5, MW-A6, and MW-A8) show that contaminant concentrations are either below the laboratory reporting limit or below cleanup levels. As discussed previously and shown on Figure 12-5, a CPOC would be established on Port of Everett property conditional on approval by the Port and Ecology. Existing monitoring well MW-A4 and potentially one or more new wells installed on Port of Everett property would serve as the CPOC for groundwater. The conceptual CPOC shown on Figure 12-5 is located on Port of Everett property, downgradient of the source areas; this conceptual CPOC was used for costing purposes. The final CPOC will be presented in the EDR upon approval by Ecology and the Port of Everett.

For conceptual design of this remediation alternative, the existing monitoring well network would potentially be supplemented with a new monitoring well north of monitoring well MW-A4. The actual number of CPOC monitoring wells will be specified in the EDR. As shown by the current plume extent on Figure 12-5, natural attenuation is currently reducing concentrations of Site constituents to below the PCLs upgradient of the proposed CPOC. Figure 6-21 demonstrates that concentrations of Site constituents have been trending downward over time. Figure 6-22 shows that measurements of MNA parameters suggest that active biodegradation is occurring within the source area. These findings provide additional evidence for the effectiveness of natural attenuation for remediation of the groundwater plume at the Site (Section 6-4).

In accordance with the current Ecology MNA guidance (Ecology, 2005), the conceptual monitoring program for this alternative area is designed to:

- Demonstrate that natural attenuation is occurring according to expectations.
- Verify that the plume is not expanding beyond the CPOC.
- Verify that cleanup levels are attained at the CPOC.
- Verify that there is no unacceptable impact to downgradient receptors.
- Detect any new releases of COCs that could impact the effectiveness of the natural attenuation remedy.
- Demonstrate the efficacy of institutional controls put in place to protect potential receptors.
- Verify attainment of remediation objectives.

The conceptual monitoring program for Groundwater Alternative 1 would include development of a detailed MA validation and long-term sampling work plan to describe the monitoring program. This work plan would identify the monitoring well network and monitoring analytes required for both characterization/validation sampling and long-term groundwater monitoring. Characterization/validation sampling would be used to demonstrate the effectiveness of MNA with respect to contaminant mass reduction, attenuation rates, and temporal trends. Long-term groundwater monitoring would be used after characterization/validation monitoring to confirm that the contaminant plume is progressing toward achievement of numerical cleanup goals.

For the conceptual design of Groundwater Alternative 1, it was assumed that characterization/validation sampling would consist of semiannual monitoring of seven monitoring wells for one year and that one or more new monitoring wells, screened from 5 to 15 feet bgs with a total depth of 15 feet, would be installed to monitor plume migration and groundwater quality at an off-Site CPOC located on Port of Everett property (Figure 12-5). Monitoring parameters and analytes included in the conceptual design include TPH-G, TPH-D, TPH-O, and BTEX, as well as the full suite of MNA geochemical parameters for the degradation of TPH (i.e., DO, nitrate/nitrite, orthophosphates, iron[II] oxide, sulfate, temperature, pH, specific conductance, total alkalinity, ORP, and total organic carbon). It is assumed that reporting for characterization/validation sampling would follow each semiannual monitoring event during the first year.

Groundwater monitoring would continue under Alternative 1 until monitoring results indicate that the cleanup standard for the Site has been attained. Ecology guidance documents indicate that the cleanup standard is typically considered attained if monitoring results from four consecutive quarters (i.e., one year) of monitoring data from the CPOC meet the cleanup levels. For Site groundwater monitoring, it has been assumed that the cleanup standard will have been attained when two consecutive years of monitoring results for a well are below cleanup levels. Since the Site groundwater monitoring program consists of semiannual monitoring, the cleanup standard evaluation will be based on results from four consecutive monitoring events. If four consecutive semiannual monitoring results (i.e., monitoring results for a two-year period) for a monitoring well are below the cleanup level, the well will be assumed to meet the cleanup standard and it will be removed from the monitoring program.

As requested by Ecology, a 50-year time period was used for estimating the cost for this alternative. For the purposes of the FFS, it was further assumed that long-term groundwater monitoring would follow characterization/validation sampling for an additional 20 years and include semiannual monitoring of the seven monitoring wells for TPH and a limited suite of geochemical parameters (DO, ORP, temperature, and pH) for a period of five years, followed by 15 years of annual monitoring. It was assumed that routine reporting for each monitoring event would be provided to Ecology for long-term groundwater monitoring, as is presently being done for the Site.

12.2.2 GROUNDWATER ALTERNATIVE 2: FUNNEL AND GATE

Groundwater Alternative 2 consists of a subsurface barrier wall arranged in a funnel and gate arrangement to provide active groundwater treatment along with MNA to achieve the cleanup standard. Redundant treatment with a PRB would remove COCs just downgradient of the western source area (Figure 12-5), and MNA (which is already achieving the PCLs at the CPOC under existing conditions), would further degrade Site COCs while groundwater flows to the CPOC. The funnel-and-gate approach under this alternative uses a low-permeability barrier wall as the funnel that would direct groundwater to a PRB in a gate configuration. The PRB would adsorb dissolved COCs from the groundwater as it passes through the gate. Any COCs that remain in groundwater passing the gate, as well as any COCs that are downgradient of the funnel and gate, would attenuate naturally as groundwater moves to the CPOC, as described for Groundwater Alternative 1. The funnel-and-gate configuration would be located downgradient of the source areas and would be sized to intercept the full width of the groundwater plume (Figure 12-5).

For the conceptual design used for this FFS, the low-permeability funnel would be a soil-bentonite barrier wall constructed using the slurry wall technique, as described in Section 11.5. An estimated 300 linear feet of barrier extending to a depth of 15 feet would be constructed, resulting in about 5,250 vertical square feet of impermeable barrier. The conceptual design considered for the gate would be a perforated concrete vault, approximately 20 feet long and 15 feet deep, that would hold the sorbent medium (Figure 12-5). The medium selected for the conceptual design is granular activated carbon (GAC), but other media, such as a sorbent clay, may be considered during final design if this alternative is selected for implementation. The conceptual layout is shown in Figure 12 5; the final design and layout would likely differ from that used for this FFS.

In order to avoid groundwater mounding upgradient of the funnel and gate and to help redistribute flow downgradient of the gate, two high-porosity trenches would be installed along both the upgradient and downgradient sides of the barrier wall funnel. These trenches would be backfilled with coarse rock and fitted with perforated piping to facilitate groundwater flow. A total of 600 linear feet of trench would be needed to avoid mounding, based on the conceptual design assumptions. Construction of the funnel and gate, including the

collection and distribution trenches, would generate approximately 400 CY (2,400 tons) of excavated soil; for conceptual design, it has been assumed that excavated soil would require off-Site disposal in a solid waste landfill.

The gate would be a permeable barrier constructed of a perforated concrete vault containing a material that would absorb TPH and other Site COCs. As noted above, GAC was selected as the sorptive medium for the FFS. The quantity of GAC included for this alternative was based on the estimated mass of COCs in groundwater, which was based on groundwater monitoring data. It was assumed that this quantity of GAC would be sufficient to last several years, but it was not expected to last until the Site was restored. Monitoring would be performed to assess the effectiveness of the adsorbent. It was further assumed that the sorptive medium would be maintained as needed (including periodic replacement) to achieve cleanup objectives if this alternative is chosen. For estimating the cost of this alternative, it was assumed that the media would be replaced in years 6, 15, and 30. The approximate location and preliminary, conceptual alignment of the system is shown on Figure 12-5. The funnel-and-gate system is expected to substantially remove dissolved COCs passing through the gate and to decrease the mass of contaminants that must attenuate to achieve the cleanup standard for Site groundwater.

In order to evaluate the performance of the funnel and gate, the removal of dissolved COCs from the groundwater, and the effectiveness of MNA in achieving the cleanup standard, a groundwater monitoring program would be implemented. The groundwater monitoring program for this alternative is the same as the monitoring program described in Section 12.2.1 for Groundwater Alternative 1 and was assumed to continue through the assumed restoration time of 50 years. This program would also be implemented in the same way that was described for Groundwater Alternative 1.

13 EVALUATION OF ALTERNATIVES

The MTCA regulations in WAC 173-340-350(8) provide general requirements for completing feasibility studies to select a preferred remediation alternative for the Site. In order for a cleanup action to be selected under MTCA, WAC 173-340-360 specifies that the cleanup action must meet the following requirements:

- 1. Protect human health and the environment.
- 2. Comply with cleanup standards.
- 3. Comply with applicable state and federal laws and regulations.
- 4. Provide for compliance monitoring.
- 5. Prevent or minimize present and future releases of hazardous substances.
- 6. Rely primarily on a method other than dilution and/or dispersion to achieve the cleanup standard.
- 7. Use permanent solutions to the maximum extent practicable.
- 8. Provide a reasonable restoration time frame.
- 9. Consider public concerns.

The remediation alternatives described in Section 12 have been designed to meet the minimum requirements noted above by combining one of the source area alternatives with one of the groundwater alternatives. The remediation alternatives selected for the Site also will incorporate institutional controls as outlined in Section 12, as it is infeasible to permanently remove all affected soil and groundwater for this Site.

The source area alternatives will be evaluated separately from the groundwater alternatives. The evaluation will identify the best-performing source area alternative and the best-performing groundwater alternative. In the DCAP, the source area and groundwater alternatives will be combined to comprehensively address Site cleanup and achieve cleanup objectives. Each group of alternatives will be evaluated against the criteria specified in WAC 173-340-360(3)(f)—protectiveness, permanence, cost, long-term effectiveness, management of short-term risks, technical and administrative implementability, public concerns, and restoration time frame. In addition, the alternatives will be evaluated against sustainability concerns to assess the life-cycle impact of the alternative on the global ecology.

13.1 SOURCE AREA ALTERNATIVES

The comparison of remediation alternatives for the source areas is presented in Table 13-1 and summarized below. Ratings from 1 to 10 were used for this evaluation, with 10 being exceptional and 1 being very low. Thus, a rating of 10 indicates that an alternative fully achieves the criterion, a rating of 5 indicates that the alternative partially achieves the criterion, and a rating of 1 indicates that the alternative does not significantly address the criterion.

In general, the remediation alternative with the overall highest rating for all evaluation criteria and considering disproportionate costs, after review and approval by Ecology, will be selected as the preferred alternative in the DCAP.

13.1.1 PROTECTIVENESS

Protectiveness is gauged primarily on the level of risk reduction achieved by the alternative and the time required for the alternative to achieve risk reduction objectives and the cleanup standard. LNAPL at the Site is essentially immobile under existing conditions and it appears to have degraded significantly under normal Site conditions. The limited extent of the downgradient plume also indicates that there is limited existing risk associated with continued releases to groundwater. Protectiveness for all three alternatives would be affected by Site constituents remaining in the inaccessible areas; however, all three alternatives remove all accessible soil contaminated with LNAPL or residual LNAPL saturation. As shown in Table 13-1, Alternatives 1 and 2 were

assigned a rating of 8 for protectiveness and Alternative 3 was assigned a slightly higher rating of 9. Protectiveness is similar for all three alternatives as similar quantities of LNAPL would be removed.

13.1.2 PERMANENCE

Permanence refers to the ability to reduce the toxicity, mobility, or volume of hazardous substances at a site, including the permanent destruction of hazardous substances. None of the three alternatives would result in permanent destruction of all Site COCs. None of the source removal alternatives would actively remove COCs from the inaccessible areas. For these reasons, the definition of permanence used in the rating of the three alternatives is the reduction in toxicity, mobility, or volume of hazardous substances in those areas that are technically feasible to actively remediate. Site COCs remaining are expected to be remediated by natural source zone attenuation, which would provide additional COC degradation and toxicity reduction. All three alternatives would remove accessible soils contaminated with LNAPL or residual LNAPL saturation and were therefore rated similarly. Alternative 3 relocates the greatest quantity of Site COCs and was assigned a rating of 9. Alternatives 1 and 2 relocate the same quantity of affected Site soil. For Alternative 2, the stabilized source area soils remaining after remediation would be somewhat less appropriate for natural source zone attenuation than the undisturbed soils remaining under Alternative 1. In addition, the stabilized source area soils remaining after stabilization would still contain residual COCs and would need to be managed appropriately if they were later excavated, such as for utility work or property redevelopment. Because the volume of soil remaining in the source areas is significantly smaller than the volume of soil in the inaccessible source area, any difference in permanence between Alternatives 1 and 2 would likely be negligible. Therefore, a rating of 8 was assigned to both Alternative 1 and Alternative 2.

13.1.3 COST

The cost evaluation addresses estimated costs related to implementation of an alternative, including costs for design and construction, operation and maintenance, monitoring, and reporting. The costs for operation, maintenance, monitoring, and reporting are recurring annual costs that will occur in the future. As requested by Ecology, it has been assumed that these costs would be incurred for a period of 50 years for each alternative. The cost estimates for the three source area alternatives, based on the conceptual designs described in Section 12, are presented in Table 13-2 and include the local sales tax of 9.7%, a 10-15% contingency for construction, and a 10% contingency for long-term monitoring/maintenance. The costs presented in Table 13-2 are in 2019 dollars and do not reflect changes in construction material costs that may have occurred since 2019. Alternative 2 was given a 15% construction contingency because Site-specific pilot testing has not been completed and a 15% contingency for operation and maintenance costs due to the uncertainty regarding the degree to which ISS could impede natural attenuation of stabilized COCs. If the restoration time frame was extended significantly, costs for Alternative 2 could be higher.

The total estimated cost for implementation and long-term monitoring and maintenance for Alternatives 1 through 3 are approximately \$9.1, \$10.7, and \$10.7 million, respectively. Annual monitoring and maintenance costs are similar for each alternative. The implementation and long-term operation and maintenance costs were used to estimate the net present value (NPV) of the costs over a 50-year period for each alternative. The net discount rate used for the NPV calculations was 1.6% and was taken from the federal Office of Management and Budget Circular A-94 that was updated in November 2017. The 50-year NPV estimated for Alternatives 1 through 3 are \$8.8, \$10.3, and \$10.3 million, respectively. The NPV costs were used for rating and comparing the alternatives.

All three alternatives would have significant costs and leave the same extent of impacted media in the inaccessible areas. As shown in Table 13-1, Alternative 1 was rated highest, with an assigned cost rating of 9, and Alternative 2 and 3 had similar costs and were rated lowest, with a cost rating of 4.

13.1.4 LONG-TERM EFFECTIVENESS

Long-term effectiveness assesses the degree of certainty and reliability of the alternative and whether treatment residue remains from implementation of the alternative that would require ongoing management. All three alternatives remove accessible soils contaminated with LNAPL or residual LNAPL saturation, therefore were rated similarly. As shown in Table 13-1, Alternative 3 was rated 8, and Alternatives 1 and 2 were rated 7. All three

alternatives would require long-term, active management of affected soil and groundwater due to the inability to actively remediate the inaccessible areas. Alternatives 1 through 3 would all require the same long-term response plans and institutional controls to address affected media in the inaccessible areas. Alternative 3 was rated the highest because slightly more contaminated material would be removed from the site. Alternatives 1 and 2 were both rated 7, as stabilization of source area soils included in Alternative 2 is expected to hinder bioremediation and therefore provides little benefit compared to Alternative 1.

For all three alternatives, affected soil and groundwater would remain in the inaccessible areas for an extended period of time. These COCs would be remediated by natural source zone attenuation. None of the alternatives would appreciably decrease existing Site risks, as they would result in only partial remediation of affected Site media at the time of implementation.

13.1.5 MANAGEMENT OF SHORT-TERM RISKS

Short-term risks are the risks to human health and the environment during implementation of the alternative. Alternatives with more invasive construction or transportation requirements would inherently have greater short-term risks. As shown in Table 13-1, all three alternatives would have substantial short-term risks due to soil excavation, stockpiling, and off-site shipment of affected soil. All three alternatives have potential to mobilize LNAPL during implementation, thereby increasing the potential for worker exposure; this potential risk is somewhat greater for Alternative 3, as the excavation is more extensive. While the excavation for Alternative 2 is less extensive, ISS is included and would result in additional short-term risks associated with implementing two different remedial techniques. Construction for Alternative 2 would require two separate construction mobilizations with different personnel and equipment. Well-established measures, such as Site-specific training, implementation of safe work practice protocols, and standard protocols for work on hazardous waste operations and emergency response sites, would be implemented to mitigate the short-term risks associated with implementation of the selected alternative. For these reasons, Alternative 1 was rated highest (8) because it would require the lowest level of invasive construction work. Alternatives 2 and 3 were assigned a rating of 4 because they are considered roughly equivalent for short term risks, with Alternative 3 requiring a larger excavation area and Alternative 2 requiring two different remediation techniques, two separate mobilization events, and two sets of construction equipment.

13.1.6 TECHNICAL AND ADMINISTRATIVE IMPLEMENTABILITY

This criterion is based on whether implementation of the alternative is technically possible to implement relative to its complexity, administrative/regulatory requirements, size, access, and integration with existing Site conditions. Removal of LNAPL from inaccessible areas (the Terminal Avenue Overpass, Federal Avenue, and former Everett Avenue) would require removal of permanent structures and numerous utilities and is impracticable for all three alternatives. It is expected that inaccessible COCs would be remediated by natural degradation processes. All three alternatives would include fairly complex RMP agreements to establish risk mitigation procedures with the City of Everett, Port of Everett, and BNSF property owners to address worker safety and proper management of affected groundwater and/or soil during future subsurface construction or dewatering activities that may occur within currently inaccessible areas of the Site. Similar access agreements and permits are required for all three alternatives. All three alternatives would require open excavations in wet soils, which are inherently challenging to implement, particularly due to the existing surrounding features that must be protected. The remediation technologies used in the three alternatives are proven, and the alternatives are considered implementable. Therefore, all three alternatives were assigned ratings above 5.

Alternative 3 requires a greater excavation area than Alternative 1; therefore, it was rated lower. While Alternative 2 would have the same excavation area as Alternative 1, ISS would require a second construction mobilization with different remediation equipment, thereby adding considerable complexity to the remediation; therefore, Alternative 2 was rated lower. Site-specific pilot testing required for Alternative 2 has not yet been completed, therefore it was rated the lowest. Implementing the excavations for all three alternatives (which would require temporary shoring) without affecting improvements on adjacent properties or on properties owned and operated by others also increases the complexity involved in obtaining access agreements and permits. For these reasons, Alternative 1 was rated highest (9), Alternative 2 was rated 4, and Alternative 3 was rated 6.

13.1.7 PUBLIC CONCERNS

Public concerns are potential community concerns with design and implementation of the remediation alternative. All three alternatives would likely be accepted by the general public and other property owners. All three alternatives would leave the same extent of impacted soil in place within the inaccessible areas, where active remediation is infeasible for all three alternatives. Alternatives 2 and 3 would require greater amounts of construction-related traffic, and therefore were rated lower than Alternative 1. The Port of Everett has also indicated that ISS would likely not be permitted on Port property. Therefore Alternative 2 was assigned the lowest rating (4). Alternative 1 was rated 8 and Alternative 3 was rated 7.

13.1.8 RESTORATION TIME FRAME

The restoration time frame assesses the time required to complete remediation and involves the practicability of achieving more rapid Site restoration, with consideration given to a number of factors, including Site risks, Site use and potential use, effectiveness and reliability of institutional controls, and toxicity of hazardous substances present. Together, these factors assess the effectiveness of the alternative, the timely reduction of risk, and achieving cleanup goals. The restoration time for the inaccessible Site areas where constituents are present is similar for all of the alternatives. Alternative 2 was rated slightly lower because ISS is expected to hinder the natural attenuation of remaining source area COCs. Alternatives 1 and 3 were rated 7 and Alternative 2 was rated 6.

13.1.9 SUSTAINABILITY

Sustainability considers the life-cycle impacts of the alternative on the global environment: alternatives requiring more energy, more manufactured materials, more transportation, or more active operations would be considered less sustainable than alternatives using lesser amounts. This criterion is not cited in the MTCA regulations, but it is considered appropriate for evaluating long-term remediation alternatives. As noted in Table 13-1, Alternative 1 was rated highest for this criterion because it has the least extensive construction and transportation requirements. Alternatives 2 and 3 would require greater construction and transportation work than Alternative 1. Alternative 3 would require more waste transportation and utilize more landfill capacity than Alternatives 1 and 2, and was therefore rated lower. For these reasons, Alternative 1 was rated 8, Alternative 2 was rated 6, and Alternative 3 was rated 4.

13.1.10 SOURCE AREA ALTERNATIVES EVALUATION SUMMARY

The evaluation discussed above for the source area remediation alternatives is summarized in Table 13-1. Based on the individual criterion ratings assigned to the three alternatives, the ratings total, which is the sum of individual ratings, is shown at the bottom of Table 13-1. Comparison of the ratings totals shows that Source Area Alternative 1, LNAPL Area Excavation and Natural Source Zone Attenuation, was the highest rated source area remediation alternative. Alternative 2, LNAPL Area Excavation and Source Area Stabilization, had the lowest total rating.

13.2 GROUNDWATER ALTERNATIVES

The two groundwater remediation alternatives described in Section 12 are evaluated against the same criteria used for evaluating the source area alternatives above. The evaluation criteria cited in the MTCA regulations are considered in addition to sustainability. The ratings are summarized in Table 13-3 and discussed below.

13.2.1 PROTECTIVENESS

Protectiveness is gauged primarily on the level of risk reduction achieved by the alternative and the time required for the alternative to achieve risk reduction objectives and the cleanup standard. Both alternatives are considered highly protective of the environment. Groundwater Alternative 2 offers a slightly lower degree of protectiveness than Alternative 1 because it includes an engineered component to remove dissolved COCs from groundwater. However, dissolved COCs in groundwater are already below PCLs at the proposed CPOC. Because Alternative 2 could decrease the effectiveness of natural attenuation processes by removing substrate from

groundwater and inaccessible areas and would require long-term maintenance of engineered components, it is rated 7 for this criterion, while Alternative 1 is rated 8.

13.2.2 PERMANENCE

Permanence refers to the ability to reduce the toxicity, mobility, or volume of hazardous substances at a site, including the permanent destruction of hazardous substances. Both groundwater alternatives would significantly reduce the toxicity of Site COCs and either permanently destroy COCs through biodegradation or immobilize them through adsorption to the PRB media. However, Alternative 2 relies on active operation and maintenance for effectiveness; thus, it is rated 7 for this criterion, while Alternative 1 is rated 9.

13.2.3 COST

The cost evaluation considers the estimated costs related to implementation of an alternative, including costs for initial design and construction, operation and maintenance, monitoring, and reporting. The estimated costs for the two alternatives, based on the conceptual designs discussed in Section 12, are presented in Table 13-4. The costs presented in Table 13-4 are in 2019 dollars and do not reflect changes in construction material costs that may have occurred since 2019. The cost estimate assumes one new additional monitoring well will be installed. The actual number of monitoring wells will be specified in the DCAP and Engineering Design Report. As noted above, the NPV of the long-term implementation and monitoring costs were used for cost evaluation. The NPV calculations for the groundwater alternatives were done using the same assumptions and evaluation time discussed in Section 13.1.3 for the source area alternatives. The two groundwater alternatives would have similar long-term monitoring costs, as noted in Table 13-4. The total estimated cost for Alternative 2 (\$2.2 million) is more than three times the total estimated cost of Alternative 1 (\$0.6 million). The 50-year NPV cost for Alternative 2 is about \$2.1 million, which is over three times the NPV cost for Alternative 1. Due to this substantial difference in cost estimates and since PCLs are currently being met at the anticipated CPOC location, Alternative 1 was assigned a cost rating of 9 while Alternative 2 was assigned a rating of 4.

13.2.4 LONG-TERM EFFECTIVENESS

Long-term effectiveness consists of the degree of certainty and reliability of the alternative and whether treatment residue remains from implementation of the alternative that would require management. Both alternatives incorporate natural attenuation, which has been active at the Site and is currently achieving PCLs at the anticipated CPOC location. As natural attenuation is a passive remediation technology that relies totally on indigenous, natural processes that include biodegradation, the two groundwater alternatives are expected to be effective for as long as COCs are present. Because active maintenance would be required to maintain effectiveness of sorbent media in the PRB under Alternative 2, and because the PRB may affect intrinsic biodegradation downgradient of the funnel and gate due to altering the substrate composition in that area, Alternative 2 was rated 6, lower than Alternative 1, which was rated 9.

13.2.5 MANAGEMENT OF SHORT-TERM RISKS

Short-term risks are the risks to human health and the environment during implementation of the alternative. Alternatives with more invasive construction or transportation requirements would inherently have greater short-term risks. Alternative 2 has higher risk associated with implementation due to the intrusive work needed to install the funnel and gate system and for off-Site transportation and disposal of soil and groundwater removed from the excavations. Conventional construction methods would be used, short-term construction risks can be effectively managed, and thus a rating of 6 was assigned to Alternative 2. Alternative 1 has only minimal subsurface construction (i.e., monitoring well installation) and, therefore, has minimal short-term risks and was assigned a higher rating of 9.

13.2.6 TECHNICAL AND ADMINISTRATIVE IMPLEMENTABILITY

This criterion is based on whether implementation of the alternative is technically possible relative to complexity, administrative/regulatory requirements, size, access, and integration with existing Site conditions. Both alternatives are technically implementable; however, Alternative 1 would be much simpler to implement

due to the substantially smaller construction requirements. However, it would be necessary to work with the Port of Everett to maintain groundwater monitoring wells over the long term and to locate the CPOC on their property. In addition to the considerations for Alternative 1, Alternative 2 would require extensive construction on property owned by the Port of Everett and leased to Vigor Marine. Negotiations and contractual conditions for installation of Alternative 2 would be more complicated than those for Alternative 1. Access agreements have been established previously with both the Port and Vigor Marine for installation and sampling of monitoring wells. Due to the large difference in implementability considerations, Alternative 1 was given a rating of 8 while Alternative 2 was given a rating of 5.

13.2.7 PUBLIC CONCERNS

Public concerns are potential community concerns with design and implementation of the alternative. As noted in Table 13-3, both groundwater remediation alternatives are considered to be equally acceptable to the public. Both are considered to be readily accepted by the public, and each alternative was given a rating of 7.

13.2.8 RESTORATION TIME FRAME

The restoration time frame involves capability of achieving Site remediation and the practicability of achieving more rapid Site restoration, with consideration given to a number of factors, including Site risks, Site use and potential use, availability of alternative water supply, effectiveness and reliability of institutional controls, and toxicity of hazardous substances present at the Site. Together, these factors are a measure of the urgency of reducing risk and achieving cleanup goals. As previously noted, groundwater located on the Port of Everett property, where the anticipated CPOC will be located, is currently below the PCLs for the Site. As shown in Table 13-3, both alternatives were assigned a rating of 9.

13.2.9 SUSTAINABILITY

Sustainability considers the life-cycle impacts of the alternative on the global environment; alternatives requiring more energy, more manufactured materials, more transportation, or more active operations would be considered less sustainable than alternatives using lesser amounts. Both remediation alternatives for groundwater are considered sustainable. Alternative 1 relies totally on a passive technology that involves indigenous, natural processes, and was assigned a higher rating of 9 for sustainability than Alternative 2, which was assigned a rating of 6. The PRB requires active monitoring and maintenance to assure effectiveness. Construction of the funnel and gate would generate a significant amount of waste that would require off-Site transportation and disposal. Additional waste generation may occur in the future under Alternative 2 due to maintenance of the PRB.

13.2.10 GROUNDWATER ALTERNATIVES EVALUATION SUMMARY

The evaluation of the groundwater remediation alternatives is presented in Table 13-3 and discussed above. Based on the ratings assigned to the individual evaluation criteria, the ratings total, which is the sum of individual ratings, is shown at the bottom of Table 13-3. The ratings total for Alternative 1 is substantially higher than the rating total for Alternative 2.

14 PREFERRED ALTERNATIVE

This section identifies and describes the preferred remediation alternative. The evaluation presented in Section 13 provides the basis for selecting the preferred approach for remediating the Site. The preferred source area alternative and the preferred groundwater alternative will be combined as the comprehensive Site remedy.

In accordance with MTCA requirements, pursuant to WAC 173-340-360 (3)(e)(ii)(A-C), a disproportionate cost analysis is also presented to support selection of the preferred Site remedy. The disproportionate cost analysis is used to compare the cost and total benefits of higher cost alternatives to those of lower cost alternatives. Costs are disproportionate to benefits if the incremental costs of the higher cost alternative exceed the benefits. A direct comparison of the ratio of the cost to the benefits may be made to select a preferred alternative. All alternatives were given a total rating score in Section 13 (Tables 13-1 and 13-3), which summarizes the overall benefit of each alternative. These ratings were then used to assign an overall benefit score for each alternative. The overall benefit score is the sum of the rating scores for all criteria except cost. A unit cost per benefit is then provided by taking the NPV cost estimated for the conceptual-level design described in this FFS and dividing it by the overall benefit score of each alternative. This unit cost per benefit for each alternative may then be used to directly compare the cost/benefit for all the alternatives. Results of the disproportionate cost analysis are summarized in Table 14-1. The disproportionate cost analysis presented in Table 14-1 is based on cost estimates in 2019 dollars. These cost estimates do not reflect changes in construction material costs that may have occurred since 2019.

14.1 SOURCE AREA REMEDIATION ALTERNATIVE

The three source area remediation alternatives are compared in Table 14-1. The three alternatives are similar in that they all incorporate institutional controls, and they all leave some affected soil in place, either within the two defined source areas or in the inaccessible areas. The three alternatives provide equally for long-term degradation of LNAPL and Site COCs from inaccessible areas. All three alternatives include removal and off-site disposal of affected soil from the source areas and a risk management plan to address affected media remaining within the inaccessible area.

In Table 14-1, the overall benefit for each alternative is quantified as the total of the ratings presented in Table 13-1 for all criteria except cost. The maximum possible overall benefit for each alternative is 80. Alternative 1 had the highest overall benefit score of 63, followed by Alternative 3 which had a benefit score of 54. Alternative 2 had the lowest overall benefit rating of 47.

Alternative 3 was rated highest for permanence, as shown in Table 14-1. However, Alternative 3 was rated only slightly better than Alternatives 1 and 2 for permanence. The estimated NPV costs, in 2019 dollars, for the three alternatives are shown on Table 14-1. Alternative 1 has the lowest estimated NPV cost of \$8.8 million. The highest cost alternative is Alternative 2, which is approximately 17% higher than the cost for Alternative 1; Alternative 3 has a similar cost to Alternative 2.

The cost-to-benefit ratios are calculated by dividing the estimated NPV cost by the overall benefit score; the calculated ratios are summarized in Table 14-1. The alternative with the lowest cost-to-benefit ratio is preferred, as it provides the greatest benefit for the given expenditure. As shown in Table 14-1, Alternative 1, LNAPL Area Excavation and Natural Source Zone Attenuation, has the lowest cost-to-benefit ratio and would provide the most benefit per dollar spent on remediation. The overall benefit rating for Alternative 1 was also slightly higher than for the other two alternatives.

Alternative 1 has a cost-to-benefit ratio of \$139,000. The most permanent alternative (Alternative 3) has the second highest cost to benefit ratio of \$190,000. While Alternative 3 has the highest permanence, the permanence rating for Alternative 1 is only slightly lower. The 37% increase in cost to benefit associated with Alternative 3 compared to Alternative 1 is disproportionate to its slight improvement in permanence. The cost/benefit ratio for Alternative 2, the lowest rated alternative for overall benefit, also had the lowest cost-to-benefit ratio of \$219,000, about 58% higher than Alternative 1. All three alternatives would incorporate similar institutional controls for long-term management of potential Site risks.

The results summarized in Table 14-1 indicate that Alternative 1 will provide the largest overall benefit for the lowest cost. While Alternative 1 is not the highest rated for protectiveness, permanence, and long-term effectiveness, its ratings are only slightly lower than those of Alternative 3, which had the highest ratings for these criteria.

As a result of the disproportionate cost evaluation described above and summarized in Table 14-1, the preferred source area remediation alternative is Alternative 1: LNAPL Area Excavation and Natural Source Zone Attenuation. This alternative meets the RAOs and the ARARs and has the highest rating for overall benefit (Table 14-1). The disproportionate cost evaluation considered the ratings for all evaluation criteria addressed in Section 13. Alternative 1 would provide the greatest benefit relative to the cost, would result in highly manageable short-term risks, and would use essentially the same approach as the other three alternatives for long-term management of residual impacted soil remaining at the Site. The substantially increased cost of Alternatives 2 and 3 compared to Alternative 1 that would be incurred to stabilize or remove impacted soils beyond the LNAPL/saturated areas within the source areas on the Property is not warranted given the significant extent of LNAPL and impacted soils that would remain in inaccessible areas. Alternative 1 would also be readily implementable with local contractors and was rated as the most sustainable alternative. Groundwater is currently below the PCLs at the anticipated CPOC located downgradient of the two defined source areas, indicating that Site groundwater poses low risk to human health and the environment and that the source area material removal or stabilization provided by the other source area alternatives would provide minimal additional benefit at substantially higher cost.

Under current conditions, subsurface contamination in the two defined source areas on the ADC/ExxonMobil properties and on the Port of Everett property is old, weathered, and, if left undisturbed, immobile. Under existing conditions, soil contamination is essentially limited to the areas where historic operations occurred and to which it migrated when it was unweathered. The contamination is effectively contained beneath the existing surface pavement cover on the Property, adjacent streets, or adjacent industrial properties. Alternative 1 would provide further protection by removal of the most highly contaminated soils located on ExxonMobil/ADC property and on Port of Everett property. It is expected that remaining Site COCs would be continually degraded by natural source zone attenuation processes.

Costs have been included in Alternative 1 to continue monitoring for LNAPL, to ensure an appropriate RMP is developed and implemented, and to maintain surface pavement cover as part of the preferred remedy. Costs have also been included to monitor the effectiveness of natural source zone attenuation. Environmental covenants would also be recorded on the Property to require that future development projects would appropriately manage affected soil and groundwater that may be encountered and provide adequate protection of indoor air quality. Environmental covenants would be established for the portions of the Site that are owned by other parties (i.e., the City of Everett, Port of Everett, and BNSF). These parties would be consulted to obtain their consent to proposed environmental covenants on their properties. The City of Everett would also be consulted so that proposed environmental covenants are consistent with current and future land-use plans.

As described in Section 12, Alternative 1 includes an RMP to address work that may be performed within the inaccessible areas where affected soil and groundwater would remain after implementing the preferred alternative. The RMP would ensure that risks to workers and the public are mitigated during work affecting the inaccessible areas, and also would ensure that any affected soil, affected groundwater, or LNAPL recovered from the inaccessible areas would be properly managed.

The evaluation presented in this FFS indicates that Source Area Alternative 1 is the preferred remediation alternative for the Site source areas.

14.2 GROUNDWATER REMEDIATION ALTERNATIVE

The groundwater remediation alternatives are also compared in Table 14-1. The overall benefit and cost were compared to calculate a cost to benefit ratio in a similar manner as described in Section 14.1 for source area alternatives. Groundwater Remediation Alternatives 1 and 2 both provide permanence, as both remove and/or destroy contaminants present in groundwater, although Alternative 1 is rated somewhat higher since it does not require active maintenance to retain its effectiveness. Under existing conditions, groundwater downgradient of the western source area, located on Port of Everett property, is below the PCLs; Alternative 1 would maintain

existing conditions in the downgradient groundwater plume. Directly comparing the benefits of the two alternatives indicates that Alternative 1 would achieve greater overall benefit than Alternative 2, primarily due to its ease of implementation, better sustainability, and lower short-term risks. The NPV cost for Alternative 2 is also about 4 times the NPV cost of Alternative 1, which results in a cost-to-benefit ratio for Alternative 2 that is nearly 4.9 times the ratio for Alternative 1 (Table 14-1). Also, Alternative 1 does not rely on engineering controls and long-term operations that are included in Alternative 2. Alternative 1 would not generate waste for disposal in a commercial landfill, whereas Alternative 2 would require off-Site disposal of soils with low levels of contamination from remedy construction and generate spent sorbent in the future.

The evaluation presented in this SC-FFS indicates that Groundwater Remediation Alternative 1 is the preferred approach to remediate Site groundwater.

14.3 PREFERRED COMPREHENSIVE SITE REMEDY

The comprehensive Site remedy identified by this FFS combines Source Area Alternative 1 with Groundwater Remediation Alternative 1.

The comprehensive Site remedy would consist of the following elements:

- excavation and landfill disposal of the most highly affected soil within the two source areas located on ExxonMobil/ADC property and on Port of Everett property;
- natural source zone attenuation to remediate COCs remaining in the source areas and inaccessible areas, including a monitoring program to assess the effectiveness of the remedy;
- a groundwater monitoring program to assess potential LNAPL mobility in the vicinity of the inaccessible areas and to assess groundwater quality downgradient of the source areas, including Port of Everett property;
- MNA to continue to degrade groundwater COCs upgradient of the anticipated CPOC, which would be located
 on Port of Everett property, downgradient of the source areas, and in the vicinity of existing downgradient
 monitoring wells;
- risk management planning by ExxonMobil/ADC with the City of Everett, Port of Everett, and BNSF property
 owners to address worker safety and management of LNAPL, affected soil, and/or affected groundwater
 resulting from potential future work within inaccessible areas on or near Federal Avenue, former Everett
 Avenue, and/or the overpass; and
- environmental covenant(s) to require that affected groundwater, soil, and/or soil vapor that may potentially be exposed during future construction is properly managed in accordance with MTCA and the solid and dangerous waste regulations.

The source area component of the Site remedy, which is based on Source Area Alternative 1, would remove the most highly affected soil and provide long-term management of both the source areas and the inaccessible areas. The conceptual excavation areas shown in Figure 12-2 represent accessible areas where potentially mobile LNAPL may be present based on historical observation of LPH in wells or TPH levels that exceeded residual saturation concentrations during several decades of environmental investigations and interim remedial activities at the Site. These areas would be used to guide excavation, with the objective to remove accessible soils containing LNAPL or hydrocarbon concentrations above residual saturation.

The excavation area on the Port of Everett property was delineated by Cardno (2021) and therefore will not change from what is presented on Figure 12-2. The excavation area delineated on the Port of Everett property is based on comprehensive sampling and will not require sidewall or excavation base sampling.

For the excavation on the ExxonMobil/ADC property, performance samples for soil remediation will be collected from the base of the excavation and from accessible sidewalls (i.e., sidewalls where sheet piling does not block access to the sidewall) to confirm removal of soils containing LNAPL. Accessible sidewall soil samples will be collected after the planned extent of excavation has been reached and field screening indicates that LNAPL or residually saturated soils are not present. If samples taken from the accessible sidewalls or the base of the excavation exceed remediation levels based on the residual saturation concentrations described below, additional

excavation will be conducted, and the sidewall or excavation base will be resampled to confirm removal of soils containing LNAPL.

Remediation levels for LNAPL will be based on residual saturation concentrations. In the absence of site-specific data, LNAPL will be assumed to be present when TPH concentrations exceed the following lower limits of the residual saturation concentrations for each hydrocarbon class:

- TPH-D: 4,800 mg/kg.
- TPH-0: 5,810 mg/kg.
- TPH-G: 2,470 mg/kg.

Further details on soil sampling and soil management will be developed as part of the DCAP and the EDR.

Groundwater will be managed as described in Section 12.1.1, and a detailed groundwater management plan will be presented in the DCAP.

Remaining Site COCs in source areas and inaccessible areas would be remediated by natural source zone attenuation. The groundwater component of the Site remedy, which is based on Groundwater Alternative 1, would rely on MNA to continue to degrade groundwater COCs in the plume that is downgradient of the source areas and the inaccessible portions of the Site. It is expected that a CPOC would be established on the Port of Everett property west of Federal Avenue in the vicinity of existing groundwater monitoring wells; this location is necessary due to the source area located west of Federal Avenue. Groundwater monitoring data collected in the vicinity of the anticipated CPOC indicate that natural attenuation has achieved the PCLs described in this FFS. The number of CPOC monitoring wells will be specified in the DCAP and EDR.

The comprehensive Site remedy would provide an appropriate remedy for the Site, where releases occurred decades ago and are highly weathered and immobile. Institutional controls would ensure that Site workers would be protected, and that future use of the ExxonMobil/ADC properties are limited to industrial use. An environmental covenant would be in place to ensure that any future exposure of affected groundwater and/or soil will be handled in accordance with appropriate solid and dangerous waste regulations. In addition, the Risk Management Plan described in Section 12.1.1 would establish procedures and plans to manage worker safety and establish protocols for proper management and disposal of soil and water if exposed in the future (e.g., future utility maintenance or development activities).

It is expected that natural attenuation, in combination with the source area remediation by excavation and natural source zone attenuation, would continue to achieve groundwater cleanup levels well upgradient of the shoreline.

In accordance with WAC 173-340-410, the comprehensive Site remedy will include monitoring to verify the protectiveness of the remediation and to assess the effectiveness of natural source zone attenuation at achieving the required cleanup levels for soil and groundwater set forth in Tables 5-1 and 5-2, respectively. The details of the confirmation monitoring program will be included in the DCAP and EDR and will include regularly scheduled collection of groundwater samples at the CPOC and designated Site monitoring wells, inspections of the Site cap, and collection of soil samples in areas where COCs remain above cleanup levels.

The total estimated NPV cost for the preferred Site remedy would be approximately \$9.3 million, which includes the cost for 50 years of monitoring and maintenance. This remedy would comprehensively address Site contamination and continue to limit migration of Site COCs via intrinsic biodegradation. The comprehensive Site remedy is sustainable and relies primarily upon noninvasive and natural remediation techniques after initial construction has been completed. Due to the presence of affected soil and groundwater within the inaccessible areas, COCs will be present at the Site for a significant time.

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TABLES

Date	Consultant	Location	Reference	Activities	Tasks Performed	Notes
May-85	RZA	ExxonMobil Parcel	RZA 1985	Borings, monitoring well installation	2-inch-diameter monitoring wells B-1 through B-5 (MW-1 through MW-5 in several reports) installed.	B-1, B-2, B-4, and B-5: Petroleum odor noticed in borings; evidence found of contamination below groundwater table.
Mar-88	RZA	ExxonMobil Parcel	AMEC E&E 2010a	Borings, monitoring well installation	2-inch-diameter monitoring wells MW-6 through MW-18 installed.	Soil and groundwater samples collected. LPH (1.29 feet) measured in MW-14.
Jan-90	ESE	ADC Parcel	AMEC E&E 2010a	Borings	Hand augers AD-01 through AD-19 to depths ranging from 1 to 4.5 feet.	Soil samples collected.
Feb-90	ESE	ADC Parcel	AMEC E&E 2010a	Borings, monitoring well installation	HSA borings W-1 through W-7. 2-inch-diameter monitoring wells W-1 through W-6 installed.	W-7 was backfilled.
Jun-90	ESE	ADC Parcel	AMEC E&E 2010a	Hand-auger borings	Hand-auger borings W-8 through W-17 to depths of 6–10 feet.	No soil data found for W-8 through W-17. Gauging data indicate that free product was observed in 10 of the 17 monitoring wells located at and around the ADC Parcel.
Oct-90	RZA	ExxonMobil Parcel	AMEC E&E 2010a	Shallow grid soil sampling, bio- feasibility study	Hand augers B-1 through B-25. Two soil samples were studied to conduct a slurry flask bio-feasibility study.	0-3 feet bgs. Rapid biodegradation of TPH-G fraction was observed. Biodegradation of TPH (undifferentiated) was not achieved.
Nov-90	Unknown	ExxonMobil Parcel	AMEC E&E 2010a	Monitoring well decommissioning	B-3 (MW-3), B-4 (MW-4), and MW-7 destroyed.	No documentation of well decommissioning.
March–June 1991	RZA	Parcels surrounding ExxonMobil Parcel	AMEC E&E 2010a	Borings, monitoring well installation	Six percussion soil borings to depths ranging from 5 to 5.5 feet bgs, 2-inch diameter monitoring wells MW-19 through MW-24, and 4-inch diameter monitoring wells MW-27 through MW-30 installed. Soil boring B-21-91 advanced to depth of 29 feet bgs.	MW-25 and MW-26 were inaccessible or dry and later renamed as B-25 and B-26. No well decommissioning records were found.
Jun-91	RZA and ESE	The Property	AGRA 1996g	Quarterly groundwater monitoring	Groundwater monitoring event. New 2-inch diameter monitoring wells MW-25 and MW-26 installed. Gauged wells: RW-1, B-1, B-2, B-5, MW-6, MW-8 through MW-13, MW-15 through MW-18, AD-19, W-1 through W-6, and W-8 through W-15.	B-1, MW-8, AD-19, W-1, W-6, W-9, W-11, W-12, W-13, and W-15 contained LPH and were not sampled.
Nov-91	RZA AGRA	ExxonMobil Parcel	AMEC E&E 2010a	Borings, recovery well	8-inch diameter recovery well RW-2 installed. Deep soil borings B-1A, B-8A, and B-15A advanced.	Soil borings advanced in vicinity of existing wells B-1, B-8, and B-15. No analytical data found for this event.

Date	Consultant	Location	Reference	Activities	Tasks Performed	Notes
Dec-91	RZA AGRA	ExxonMobil Parcel	AGRA 1996g	Quarterly groundwater monitoring, aquifer and tidal study	Quarterly groundwater monitoring. Gauged wells: RW-1, B-1, B-2, B-5, MW-6, MW-8 through MW-13, MW-15 through MW-30, and AD-19. Aquifer study involved 24-hour pumping from MW-10 at a rate of 1 to 2 gpm and measuring response in MW-18, RW-1, and RW-2 for 48 hours.	B-1, MW-8, MW-11, MW-26, MW-27, MW-29, and AD-19 contained LPH and were not sampled. Hydraulic conductivity at the Site was estimated as 4 to 9.5 feet/day. Minimum tidal influence was observed.
1992	RZA AGRA	NA	NA	Discussions with Ecology	Ecology discussed enforcement with Mobil and RZA AGRA. Ecology decided to allow Site to go independent.	
Dec-93	RZA AGRA	West of ExxonMobil Parcel	AMEC E&E 2010a	Off-Property borings, monitoring well installation, GPR survey	2-inch diameter monitoring wells MW-31 through MW-33 and MW-35 through MW-37 were installed; B-34 advanced and backfilled. GPR survey was conducted to assess whether underground product lines had been removed.	Survey did not identify any subsurface linear features.
Dec-93	RZA AGRA	ExxonMobil Parcel and off-Property to the west	AGRA 1996g	Quarterly groundwater monitoring	Groundwater monitoring event. Gauged wells B-1, B-2, MW-6, MW-8 through MW-13, MW-15 through MW-18, MW-27 through MW-33, MW-35 through MW-37.	B-1, MW-27, and MW-29 contained LPH and were not sampled.
Dec-93	RZA AGRA	West of ExxonMobil Parcel	AMEC E&E 2010a	Test pits, recovery trench	Excavated five test pits, TP-1 through TP-5, to depths ranging from 3 to 3.5 feet bgs. Recovery trench installed along the western border of ExxonMobil Parcel.	Monitoring well MW-21 was reportedly decommissioned during the recovery trench installation activities. However, a 2002 decommissioning record was found that stated that MW-21 was decommissioned in 2002.
1995			NA	Agreed Order DE-95TC-N402		Required evaluation of LPH.
Jul-95	RZA AGRA	ADC Parcel	AGRA 1996g	Quarterly groundwater monitoring	Groundwater monitoring event. Gauged wells: W-3, W-5, W-9, W-10, W-12 through W-15.	W-9, W-12, and W-13 contained LPH and were not sampled.
Oct-95	U.S. Coast Guard Puget Sound Marine Safety Office & City of Everett	North of the Property	AMEC E&E 2010a	Investigation of petroleum product discharge into Everett Harbor	Camera surveys of the sewer lines made.	Outfall located approximately 175 yards northwest of the ADC Parcel; LPH seepage observed in section of CSO line.
Nov-95	RZA AGRA	Site	AGRA 1996g	Groundwater monitoring	Groundwater monitoring event. Gauged wells: RW-1, RW-2, B-1, B-2, MW-6, MW-8 to MW-13, MW-15 to MW-18, MW-27 to MW-37, and NRW-1.	B-1, MW-18, MW-29, and MW-30 contained LPH and were not sampled.

Date	Consultant	Location	Reference	Activities	Tasks Performed	Notes
Dec-95	RZA AGRA	Site	AGRA 1996g	Groundwater monitoring	Groundwater monitoring event. Gauged wells: RW-2, B-2, MW-8, MW-9, MW-18, MW-15 through MW-18, MW-27, and MW-28.	RW-2, MW-9, MW-18, and MW-28 contained LPH and were not sampled.
Mar-96	AGRA	North of the Property	AMEC E&E 2010a	Borings	Direct-push soil borings GP-1 through GP-13. Borings associated with the CSO line repair.	The collected soil sample results indicated that soil surrounding the damaged portion of the CSO had petroleum hydrocarbon impacts. LPH accumulation was noticed in temporary screens installed in soil borings. No groundwater samples were collected from temporary screens.
Apr-96	City of Everett		AMEC E&E 2010a	Meeting	Meeting held to discuss options for repairing the section of CSO line.	Decisions made regarding replacement of the settled portion of the line and slip lining of the remaining portion of the line.
May-96	AGRA	ADC Parcel	AGRA 1996d	Borings	Bobcat borings BB-1 through BB-14.	Soil samples collected.
Jun-96	AGRA	ADC Parcel	AGRA 1996d	Borings, monitoring wells, and test pits	4-inch diameter recovery well VRW-1 and 2-inch diameter monitoring well MW-38 installed. Seven test pits TP-1-96 through TP-7-96 excavated.	Wells were installed on the northeast corner of the property. Test pits were located throughout the ADC Parcel.
Aug-96	AGRA	Site	AMEC E&E 2010a	Monitoring wells	Gauged wells at the property.	LPH found in B-1, VRW-1, MW-27, MW-29, MW-30, MW- 38, W-1, W-9, W-15.
Feb-97	PTI	Site	PTI 1997	LPH recovery technical memorandum	Technical memorandum to summarize environmental investigations, LPH recovery activities, and geology.	PTI concluded that long-term, passive (LPH only) recovery may be the most effective method of LPH recovery. PTI also concluded that active LPH and groundwater recovery that had been performed up to that time had been effective for short durations, but recovery structures did not continue to recover LPH for extended periods of time when active recovery was employed.

Date	Consultant	Location	Reference	Activities	Tasks Performed	Notes
November 1997 through January 1998	Pacific Environmental Group, Inc.	Kimberly-Clark property	Pacific Environmental Group, Inc. 1998	Borings, monitoring wells	Direct-push borings Probe-1 through Probe-15 were advanced, and 2-inch diameter HSA monitoring wells KC-1 and KC-2 were installed inside the KC warehouse.	Groundwater samples were collected from temporary screens installed in each boring. LPH not identified in soil borings or monitoring wells. TPH-D and TPH-O were detected above MTCA Method A cleanup levels in borings advanced in the vicinity of repaired CSO line. Samples not collected in vicinity of former ASTs.
1998			NA	Agreed Order DE98TC-P-N223		Required remedial investigation/focused feasibility study.
Jul-98	Exponent	Site	Exponent 1998a	Remedial Investigation and Focused Feasibility Study	Exponent summarized the history of the Property and evaluated feasible remedial options for the Site.	Exponent recommended the installation of LPH recovery trenches and installation of a low-permeability cap over the property.
Jul-98	Exponent	Site	Exponent 1998b	Final Interim Action Work Plan and Engineering Design Report	Exponent presented design for interim measures at the Property.	Exponent provided specifications for demolition of existing Site structures and installation of LPH recovery trenches, water treatment system, and low-permeability cap over the Property.
Oct-99	Kleinfelder	The Property	Exponent 2000	Monitoring wells installation	Monitoring wells W-10R, W-15R, and MW-40R.	Wells installed to replace wells W- 10, W-15, and MW-40.
Dec-99	Dames and Moore/URS	South and southeast of the Property	URS 2000a	Geotechnical drilling and piezometer installation	DM-6, DM-7, and DM-8 were sampled for environmental samples.	Work associated with CSTO Project.
Sep-00	URS	South, east, and southeast of the Property	URS 2000b	Borings	Phase II investigation for the CSTO Project. Push- probe borings UG-1 through UG-12.	Groundwater samples collected from temporary screens installed in UG-2 and UG-8. Estimated 7,600 cubic yards of petroleum-contaminated soil present along the overcrossing alignment.
Jul-01	URS	Johnston Petroleum parcel	URS 2001a and b	Borings	Phase II investigation for Johnson Petroleum parcel. Push-probe borings JP-1 through JP-7.	Soil samples collected. Groundwater samples collected from JP-1, JP-4, and JP-7. No significant contamination found.

Date	Consultant	Location	Reference	Activities	Tasks Performed	Notes
Feb-02	ERI	Site and vicinity	ERI 2002a	Monitoring well decommissioning and re- installment	Abandonment of monitoring wells (MW-22, MW-23, MW-24, MW-35, and MW-37) and piezometer DM-6 due to proximity to the CSTO Project. Re-installed well W-2 screened from 3 to 23 feet bgs.	No soil samples taken during W-2 installation. The reported abandonment of MW-21 in 2002 contradicts the reported decommissioning of MW-21 due to installation of the recovery trench to the west of the Property in December 1995.
2002	Reid Middleton	CSTO	Reid Middleton 2002	Memorandum to Ecology	Southeast corner of the asphalt cap over the ExxonMobil Parcel removed. Steel piles for concrete foundation were installed.	No information regarding contaminant soil excavation and removal was found.
2002-2007	Kleinfelder, ERI, AMEC	Site	Various	Groundwater monitoring	Monthly LPH gauging and quarterly groundwater monitoring.	LPH greater than 0.02 foot thick is bailed manually and oleophilic socks are replaced.
Jul-02	ERI	West of the ExxonMobil Parcel	ERI 2002b	Well decommissioning	Monitoring wells MW-20, MW-21, and one unidentified well were decommissioned.	The record contradicts the records that indicate that MW-21 was decommissioned during the December 1993 recovery trench installation.
Feb-07	AMEC/Bravo Environmental	Site	AMEC E&E 2007	Video survey of storm drain system	AMEC contracted Bravo to conduct a video survey of the storm drain system installed as part of 1999 interim measure to verify that groundwater from the Property is not infiltrating into the stormwater system through possible cracks and fissures in the piping and catch basins.	No significant cracks or fissures within the stormwater system were observed.
2007–present	AMEC	Site	AMEC E&E 2010a	Groundwater monitoring	AMEC requested to change to semiannual groundwater monitoring in 2007.	Request was accepted by Ecology.
2008	AMEC	West of the Property	AMEC E&E 2008b	Monitoring wells	Off-property monitoring wells MW-A1 and MW-A2 installed on the west side of Federal Avenue.	Monitoring wells MW-A1 and MW-A2 are incorporated into existing groundwater monitoring network.
Feb-08	AMEC	Site	AMEC E&E, 2008a	Tidal study	Measured tidal response in W-3, W-6, MW-11, MW-28, & MW-40R.	Minimal response in each well, except MW-11.
Jun-08	AMEC	Site	2010 updated survey included as Appendix C	Well head elevations survey	True North Land Surveying of Seattle, Washington, surveyed recovery and monitoring wells located on-Site.	Recovery wells LPH-1 to LPH-9 and monitoring wells W-1, W-2, W-3, W-6, W-10R, MW-10, MW-11, W-15R, W-17, RW-2, MW-19, MW-27, MW-28, MW-29, MW-30, MW-40R, MW-A1, and MW-A2.

Date	Consultant	Location	Reference	Activities	Tasks Performed	Notes
2010	AMEC	Site	AMEC E&E 2010a		Summarized Site history, previous environmental investigations and interim remedial activities, known environmental conditions, preliminary conceptual site model, and remaining data gaps.	FFS Work Plan included a sampling and analysis plan to guide data gaps investigation and identified applicable remedial technologies to be evaluated n the FFS.
2010	AMEC	Site	AMEC E&E 2010a	Agreed Order DE 6184		Required FFS and Draft CAP.
2010	AMEC	Site	AMEC E&E 2011f	Sampling for City of Everett Force Main	Borings CE-1 to CE-8 advanced on Federal Avenue, former Everett Avenue, and the BNSF property to characterize soils in the alignment of City's planned force main.	Analytical results were provided to City of Everett and used to characterize soil excavated for the force main project for disposal purposes.
2011	AMEC	Site	AMEC E&E 2011b	Data gaps investigation	Seven deep borings (AB-1 to AB-5, AP-6, MW-7ab), six shallow borings (AP-1 through AP-5, AP-7), five new off-Property monitoring wells (MW-A3 through MW-A7), aquifer testing, and tidal influence study.	A plume of groundwater with petroleum hydrocarbon impacts was identified west & northwest of the Property. Groundwater downgradient and upgradient from the Property was not affected by COCs. Geochemical parameters were consistent with an anaerobic environment in which active petroleum biodegradation appears to be occurring. No continuous silt layer was identified beneath the Property. Monitoring wells MW-A3 through MW-A7 incorporated into existing groundwater monitoring network.
2011	AMEC	Site	AMEC E&E 2011a	Tidal influence investigation	A stilling well with transducer was installed on the Everett Pier to automatically record tidal elevations. Pressure transducer/ data loggers were installed in monitoring wells W-3, W-6, MW-11, MW-19, MW-28, MW-40R, and MW-A1 through MW-A7 to record groundwater levels every 6 minutes for 6 days.	Monitoring wells W-3, MW-11, MW-A1, MW-A2, MW-A3, MW-A5, and MW-A6 are tidally influenced, with tidal fluctuations ranging from 0.1 foot to 1.1 feet. MW-19, MW-28, MW-40R, MW-A4, and W-6 exhibited minimal tidal influence, and MW-A7 was unaffected by tidal elevation. A potentiometric surface map showed groundwater flow toward the west.
2011	AMEC	Former Everett Avenue	AMEC E&E 2011g and h	Observations of seeps along former Everett Avenue	AMEC recorded photographs in the field to document observations of petroleum product seeps through the pavement on former Everett Avenue.	

ExxonMobil/ADC Property, Ecology Site ID 2728, Everett, Washington

Date	Consultant	Location	Reference	Activities	Tasks Performed	Notes
2012	AMEC	Federal Avenue and former Everett Avenue	AMEC 2012b	Observations during City of Everett force main replacement	AMEC observed excavation and drilling activities during installation of the City's force main and recorded notable subsurface features when relevant, including the presence of LPH if encountered.	AMEC documented the presence of LPH in borings and/or trenches along much of the alignment on former Everett Avenue, and at selected locations along Federal Avenue.
2013–2014	AMEC	Site	AMEC 2014a	Data gaps investigation	A total of 33 soil borings were drilled on the Property and nearby properties, and soil samples were analyzed to delineate areas of affected soil at the Site. One of the borings was completed as a new monitoring well (MW-A8).	Higher COC concentrations were found primarily on the Property and in the western portion of the former ADC garage. Contamination from the Site extends to the former ADC garage and former Everett Avenue. Contamination on KC property north of former Everett Avenue likely originates from sources on the KC property. Monitoring well MW-A8 incorporated into groundwater monitoring network.
2020-2021	Cardno	Port of Everett	Appendix F	Excavation delineation	A total of 51 soil borings were drilled on the Port of Everett property, and soil samples were analyzed to delineate areas exceeding remediation levels for future excavation. Two geotechnical borings were also advanced. Analytical results will be used so that collection of sidewall and base soil samples during future excavation work is not necessary.	COC concentrations exceeding remediation levels are present as deep as 16 feet bgs.

Abbreviations

ADC = American Distributing Company

AMEC = AMEC Environment & Infrastructure, Inc.

AMEC E&E = AMEC Earth & Environmental, Inc.

AST = aboveground storage tank

bgs = below ground surface

CAP = Cleanup Action Plan

COC = constituent of concern

CSO = combined sewer outflow

CSTO = California Street Overcrossing

Ecology = Washington State Department of Ecology

ERI = Environmental Resolutions, Inc.

ESE = Environmental Science and Engineering, Inc.

FFS = Focused Feasibility Study

gpm = gallons per minute

GPR = ground penetrating radar

HSA = hollow-stem auger

KC = Kimberly-Clark

Kleinfelder = Kleinfelder, Inc.

LPH = liquid petroleum hydrocarbons

MTCA = Model Toxics Control Act

PTI = PTI Environmental Services

RZA = Rittenhouse-Zeman & Associates, Inc.

RZA AGRA = RZA AGRA Earth & Environmental, Inc.

TPH = total petroleum hydrocarbons

TPH-D = total petroleum hydrocarbons-diesel range organics

TPH-G = total petroleum hydrocarbons-gasoline range organics

TPH-O = total petroleum hydrocarbons-residual range organics

TABLE 3-2: 2010 FORCE MAIN SAMPLING SOIL ANALYTICAL DATA¹

ExxonMobil/ADC Site, Ecology Site ID 2728, Everett, Washington

(all results are in milligrams per kilogram, dry weight basis)

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		A	rsen	ic	Ва	Barium			ium	Chi	rom	ium		Leac	d	Se	leniι	ım		Silve	r	M	lercı	ıry
Sample ID	Sample Depth	Resu	lt	LOQ	Resul	t LO	Re	sult	LOQ	Resu	lt	LOQ	Resu	lt	LOQ	Resu	lt	LOQ	Resu	lt	LOQ	Resu	ılt	LOQ
	MTCA CUL ²		20		16	5,000		2.0	00	19.	0/2,0	000 ³		250			400			400			2.00)
CE 1	0.5-3 feet	1.99		1.19	22.2	2.3	1.1	9 U	1.19	20.7		1.19	14.2		1.19	2.37	U	2.37	1.19	U	1.19	0.116	U	0.116
CE 1	6.5-8 feet	4.19	U	4.19	14.8	8.3	4.1	9 U	4.19	9.63		4.19	8.88		4.19	8.37	U	8.37	4.19	U	4.19	0.411	U	0.411
CE 2	1-4 feet	1.08	U	1.08	43.1	2.1	1.0	8 U	1.08	22.3		1.08	4.68		1.08	2.16	U	2.16	1.08	U	1.08	0.111	U	0.111
CE 2	4-8 feet	1.63		1.13	63.7	2.2	1.1	3 U	1.13	27.3		1.13	16.7		1.13	2.26	U	2.26	1.13	U	1.13	0.114	U	0.114
CE 3	1-4 feet	2.34		1.02	14.0	2.0	1.0	2 U	1.02	28.2		1.02	2.81		1.02	2.05	U	2.05	1.02	U	1.02	0.104	U	0.104
CE 3	4-8 feet	4.80		1.65	72.6	3.2	1.6	5 U	1.65	68.6		1.65	4.41		1.65	3.29	U	3.29	1.65	U	1.65	0.160	U	0.160
CE 4	0.5-4 feet	4.64		1.25	83.2	2.5	1.2	5 U	1.25	32.8		1.25	70.4		1.25	2.51	U	2.51	1.25	U	1.25	0.126	U	0.126
CE 4	5-7 feet	1.68		1.25	46.0	2.5	1.2	5 U	1.25	25.3		1.25	5.44		1.25	2.51	U	2.51	1.25	U	1.25	0.124	U	0.124
CE 5	0.5-4 feet	6.87		1.14	105	2.2	1.1	4 L	1.14	23.0		1.14	26.6		1.14	2.27	U	2.27	1.14	U	1.14	0.115	U	0.115
CE 5	5-8 feet	1.40		1.11	38.8	2.2	1.1	1 U	1.11	27.7		1.11	2.09		1.11	2.22	U	2.22	1.11	U	1.11	0.107	U	0.107

Notes

- 1. Data qualifiers were applied by laboratory. Data qualifiers are as follows:
- U = The analyte was not detected at the reporting limit indicated.
- 2. MTCA Method A CULs were used for arsenic, cadmium, chromium, lead, and mercury because this value is the most conservative. MTCA Method B CULs associated with direct contact were used for barium, selenium, and silver because MTCA Method A cleanup levels were not available for these analytes, and because the data were used for waste profiling.
- 3. Samples were not analyzed for chromium speciation, therefore both the MTCA Method A CULs for hexavalent chromium (19.0) and trivalent chromium (2,000) are shown.

Abbreviations

CE = City of Everett LOQ = limit of quantification
CUL = cleanup level MTCA = Model Toxic Control Act

ID = identification N/A = not applicable

TABLE 4-1: CHRONOLOGY OF HISTORICAL INTERIM REMEDIAL MEASURES

ExxonMobil/ADC Property, Ecology Site ID 2728, Everett, Washington

Date	Consultant	Location	Reference	Activities	Tasks Performed	Notes
April–May 1988	RZA	ExxonMobil Parcel	PTI 1997	Recovery trench installation, SVE and groundwater treatment system test (oil- water separator and air stripper), infiltration gallery, pumping subsurface fluids	Installation of recovery trench near MW-14, SVE system and groundwater treatment system to evaluate feasibility of extracting LPH. Infiltration gallery installed in the vicinity of MW-14. Subsurface fluids were pumped with a vacuum truck from the sumps.	Decommissioned in 1998 during construction of low- permeability cap at the Property. The gallery was T-shaped and 45 feet long with two 55-gallon drums installed at both ends as sumps. 1,400 gallons of liquid removed, 50 gallons was LPH. As a result, LPH thickness in MW-14 decreased to 0.40 foot by August 1988.
Mar-89	RZA	ExxonMobil Parcel	RZA 1989	Automated groundwater extraction and treatment system	An automated groundwater extraction and treatment system was installed in the location of the infiltration gallery. The system included fluid extraction sump stationed in RW-1 (formerly MW-14), oil-water separator, air stripper, and re-infiltration gallery.	The groundwater extraction and treatment system was shut down in March 1990 due to flooding of the reinfiltration gallery, and has not been restarted.
Nov-91	RZA AGRA	ExxonMobil Parcel	PTI 1997	Borings, recovery well	8-inch diameter recovery well RW-2 installed.	No analytical data found for this event.
Dec-93	RZA AGRA	West of ExxonMobil Parcel	AGRA 1993	Test pits, recovery trench	Recovery trench installation along the western border of ExxonMobil Parcel.	
Jun-96	AGRA	North of the Property	AGRA 1996b and c	CSO line repairs	Excavation of settled portion of pipe replaced. Slip- lining of remaining CSO line. CSO line excavation dewatering.	1,450,800 gallons of groundwater and 23,050 gallons of LPH were removed during CSO line excavation and dewatering.
Jun-96	AGRA	LPH Vacuum Recovery Pilot Test	AGRA 1996a, d,e, and f	LPH vacuum recovery pilot test	14-day test included SVE and groundwater/LPH pumping system.	125 gal of LPH and 28,228 gallons of groundwater removed from VRW-1 during test.
Nov-98	Kleinfelder	ADC Parcel	Exponent 2000	Survey, geotechnical evaluation	Initial survey. Asbestos survey prior to demolition.	Demolition activities included four buildings on the ADC parcel. Asbestos abatement activities were conducted in November 1998, and demolition was completed in January 1999.
Dec-98	Kleinfelder	Water management and treatment system	Exponent 2000	Installation of treatment system	A water management and treatment system consisting of an oil–water separator, a settling tank, and a carbon polishing unit was constructed at the Property.	System treated approximately 2.5 million gallons of water between December 1998 and September 1999. Approximately 19,900 gallons of oily water and 450 gallons of sludge were collected between December 1998 and September 1999.
Dec-98	Kleinfelder	The Property	Exponent 2000	Interim remedial action	Removed TPH-impacted soil, graded the property, removed purge water.	162 tons of contaminated shallow soil and vegetation removed from within the ADC firewall area during demolition and transported to TPS Technologies facility for disposal. 3.5 tons of class 3 PCS taken to CRS Associated. Marine Services, Inc. removed 110 gallons of purge water.
1999	Kleinfelder	The Property	Exponent 2000	Interim remedial action	Monitoring well abandonment. Interceptor trench construction along the western and northern property boundaries. Low-permeability cap construction over the property. Recovery wells LPH-1 through LPH-9 installed in interceptor trench. Stormwater collection system that connects to the City of Everett sewer system was installed.	Monitoring wells MW-6, MW-8, MW-9, MW-12, MW-13, MW-15, MW-16, MW-17, MW-38, WP-1, B-1, B-2, W-4, W-8, W-11, W-12, W-14, AD-11, AD-12, AD-13, AD-15, AD-19, W-10, W-15, and MW-40 abandoned. Completed Site grading, installation of two layers of geotextile fabric, asphalt-treated base material, and paving fabric and asphalt cap.
2002-present	Kleinfelder, ERI, AMEC E&E	Site	Various	Petroleum recovery	Monthly removal of LPH.	LPH greater than 0.02 foot thick is bailed manually, and oleophilic socks are replaced.
Jul-08	Floyd Snider	North-northeast of the Property	AMEC E&E 2010a	Excavation and disposal of PCS and dewatering the excavation	Soil associated with Puget Sound Outfall 5 Overflow Structure project was excavated and disposed of. In addition, dewatering occurred during excavation.	Soil was field screened. Soil exhibiting obvious signs of contamination was disposed of as Class II soil without sampling. Soil that appeared to be "clean" was sampled and then disposed as Class II soil. Water from the excavation was sampled for the City sewer discharge requirements.
2010	AMEC E&E	Federal Avenue and Port of Everett property	AMEC E&E 2011e	Removal of abandoned pipes and affected soil	AMEC decommissioned pipelines west of the Property to prepare for upgrades to the storm sewer line planned by the City of Everett.	A total of 76.55 tons of construction debris, 243 tons of soil, 487 linear feet of piping, 65,669 gallons of non-regulated liquid, four 55-gallon product/ water drums, and four 55-gallon solid waste drums were removed and disposed of off Site. Samples from base of excavation showed contaminated soil left in place.
2011–2012	AMEC	BNSF and KC properties	AMEC 2012a	Interim removal action	Excavation and off-Site disposal of surface asphalt, affected soil, and recovered LPH and treatment of the recovered groundwater from the secondary source areas on the BNSF and KC properties. Monitoring wells MW-27 through MW-30 abandoned.	Approximately 3,785 tons of material was excavated and disposed of at a permitted landfill, approximately 2,530 gallons of LPH was removed, and 1,489,246 gallons of petroleum-affected groundwater was removed and treated. Affected material was evident and left in place at all side wall areas of the completed excavation on the BNSF property and on the north and east sidewalls on the KC property.

Abbreviations
ADC = American Distributing Company
AMEC = AMEC Environment & Infrastructure, Inc.
AMEC E&E = AMEC Earth & Environmental, Inc.
BNSF = BNSF Railway Company
CSO = combined sewer outflow
ERI = Environmental Resolutions, Inc.
KC = Kimberly-Clark
Kleinfelder = Kleinfelder, Inc.

LPH = liquid petroleum hydrocarbons PCS = petroleum-contaminated soil PTI = PTI Environmental Services RZA = Rittenhouse-Zeman & Associates, Inc. RZA AGRA = RZA AGRA Earth & Environmental, Inc. SVE = soil vapor extraction
TPH = total petroleum hydrocarbons

TABLE 4-2: 2010 REMOVAL OF ABANDONED PIPES AND AFFECTED SOIL STOCKPILE SOIL ANALYTICAL DATA¹

ExxonMobil/ADC Site, Ecology Site ID 2728, Everett, Washington

(all results are in milligrams per kilogram, dry weight basis)

	Ar	seni	ic	В	ariu	m	Ca	dmi	ım	Chr	omi	ium		Lead	1	Se	leniı	ım		Silver		Mercui		ry
Sample ID	Result	t	LOQ	Resu	lt	LOQ	Resu	lt	LOQ	Resu	lt	LOQ	Resu	lt	LOQ	Resu	lt	LOQ	Resu	lt	LOQ	Resu	lt	LOQ
MTCA CUL ²		20		1	6,00	0		2.00		19.0)/2,0	000 ³		250			400			400		7	2.00	
SP-1	2.08		1.53	72.4		3.06	1.53	U	1.53	25.1		1.53	30.9	J	1.53	3.06	U	3.06	1.53	U	1.53	0.160	U	0.160
SP-2	3.53		1.16	75.8		2.32	1.16	U	1.16	27.4		1.16	61.9		1.16	2.32	U	2.32	1.16	U	1.16	0.116	U	0.116
SP-3	4.45		1.24	81.0		2.49	1.24	U	1.24	34.1		1.24	55.9		1.24	2.49	U	2.49	1.24	U	1.24	0.128	U	0.128
SP-4	4.95		1.76	110		3.51	1.76	U	1.76	64.1		1.76	59.9		1.76	3.51	U	3.51	1.76	U	1.76	0.181	U	0.181
SP-5	3.51		1.24	102		2.47	1.24	U	1.24	33.3		1.24	39.4		1.24	2.47	U	2.47	1.24	U	1.24	0.128	U	0.128
D-1	1.82		1.25	36.9		2.49	1.25	U	1.25	53.1		1.25	16.7		1.25	2.49	U	2.49	1.25	U	1.25	0.126	U	0.126
Average - SP	3.70			88.2			1.39			36.8			49.6			2.77			1.39			0.143		
Average - All	3.39			79.7			1.36			39.5			44.1			2.72			1.36			0.140		

Notes

- 1. Data qualifiers were applied by laboratory. Data qualifiers are as follows:
- U = The analyte was not detected at the reporting limit indicated.
- J = Reported value is an estimate.
- 2. MTCA Method A CULs were used for arsenic, cadmium, chromium, lead, and mercury because this value is the most conservative. MTCA Method B CULs associated with direct contact were used for barium, selenium, and silver because MTCA Method A cleanup levels were not available for these analytes, and because the data were used for waste profiling.
- 3. Samples were not analyzed for chromium speciation, therefore both the MTCA Method A CULs for hexavalent chromium (19.0) and trivalent chromium (2,000) are shown.

Abbreviations

CUL = cleanup level MTCA = Model Toxic Control Act

D = drum N/A = not applicable

ID = identification SP = stockpile

LOQ = limit of quantification

TABLE 5-1: PRELIMINARY CLEANUP LEVELS FOR GROUNDWATER¹

ExxonMobil/ADC Site, Ecology Site ID 2728, Everett, Washington

Values in micrograms per liter (µg/L)

	CAS	Groundwater, MTCA Method A	Groundwat MTCA Method I	В	Groundwater, MTCA Most Restrictive		ITCA	Aquatic Life - Marine/Acute (WAC	Marine/Chronic (WAC	Aquatic Life - Human Health (WAC 173-	Aquatic Life - Marine/Acute	Surface Water ARAR- Aquatic Life - Marine/Chronic	Surface Water ARAR - Human Health Consumption of Organisms	EPA Human Health SW Criteria - Marine	Method B Groundwater Screening Level Protective		Preliminary Cleanup
Constituent	Number	Cleanup Level	Cleanup Le	vei	ARAR	Level	_	173-201A- 240)	173-201A- 240)	201A- 240)	(CWA §304)	(CWA §304)	(CWA §304)	(40 CFR 131.45)	of Indoor Air ²	PQL	Level ³
Volatile Organic Compound																	
Benzene	71-43-2	5	0.8	С	5	23	С			1.6			16		2.4	0.5	1.6
Ethylbenzene	100-41-4	700	800	nc	700	6,900	nc			270	130			31	2800		31
Xylenes	1330-20-7	1,000	1600	nc	10,000										310		310
Semivolatile Organic Comp	ounds																
1-methylnaphthalene	90-12-0		1.5	С												0.5	1.5
Total cPAHs ⁴		0.1	0.023	С	0.2	0.22	С			0.0021			1.30E-04	1.60E-05		0.1	0.15
Total Petroleum Hydrocark	ons																
Gasoline	86290-81-5	800														800	800
Diesel	NA	500														500	500
Motor oil	NA	500														500	500

Notes

- 1. All levels downloaded from Washington State Department of Ecology Cleanup Levels and Risk Calculations website at https://fortress.wa.gov/ecy/clarc/CLARCHome.aspx.
- 2. Method B groundwater screening level protective of indoor air, lowest of carcinogenic or non-carcinogenic, in the Washington State Department of Ecology 2015 Vapor Intrusion Updated Excel table issued on 4/6/2015.
- 3. The preliminary cleanup level is the lowest value of the presented ARARs because MTCA method A values are based on protection of drinking water, which is not a complete pathway.
- 4. The cleanup levels and remediation levels established for benzo(a)pyrene shall be used, respectively, as the cleanup levels and remediation levels for mixtures of cPAHs (WAC 173-340-708[8][e]).
- 5. The PCL for total cPAHs was revised so that PCL was no lower than PQL for project laboratory (WAC 173-340-705[6]).

<u>Abbreviations</u>

-- = not available

ARAR = applicable or relevant and appropriate requirement

c = carcinogenic

CAS = Chemical Abstracts Service

CFR = Code of Federal Regulations

cPAH = carcinogenic polycyclic aromatic hydrocarbons

CWA = Clean Water Act
MTCA = Model Toxics Control Act

NA = not applicable

nc = noncarcinogenic

PCL = preliminary cleanup level

PQL = practical quantitation limit

WAC = Washington Administrative Code

SW = surface water

Table 5-2: PRELIMINARY CLEANUP LEVELS FOR SOIL¹

ExxonMobil/ADC Site, Ecology Site ID 2728, Everett, Washington

Values in milligrams per kilogram (mg/kg)

Constituent	CAS Number	Soil, MTCA Method A Cleanup Level, Unrestricted Land Use	Soil, MTCA Method Cleanup Level, Unrestricted Land U		Soil Cleanup Level Protective of Groundwater (Unsaturated) ²	Soil Cleanup Level Protective of Groundwater (Saturated) ²	Practical Quantitation Limit	Preliminary Cleanup Level (Unsaturated)	Preliminary Cleanup Level (Saturated)
Volatile Organic Compound	s								
Benzene	71-43-2	0.03	18	С	0.009	0.0006	0.005	0.009	0.005^3
Ethylbenzene	100-41-4	6	8,000	nc	0.3	0.02	0.005	0.3	0.02
Xylenes	1330-20-7	9	16,000	nc	2.8	0.16	0.005	2.8	0.16
Semivolatile Organic Compo	ounds								
1-methylnaphthalene ³	90-12-0	NA ⁴	34	С	0.08	0.004	0.50	0.08	0.53
Total cPAHs ⁵	NA	0.1	0.19	С	1.9	0.1	0.02	0.2	0.1
Total Petroleum Hydrocarbo	ons								
Gasoline	86290-81-5	30/100 ⁶			NA	NA	0.5		30
Diesel	NA	2,000			NA	NA	5.0		2,000
Lube Oil	NA	2,000			NA	NA	5.0		2,000

Notes

- 1. All levels downloaded from Washington State Department of Ecology Cleanup Levels and Risk Calculations website at https://fortress.wa.gov/ecy/clarc/CLARCHome.aspx.
- 2. The calculations for soil cleanup levels protective of groundwater are presented in Table 5-3. The soil to groundwater cleanup level is based on a groundwater cleanup level of 31 µg/L, which is protective of surface water.
- 3. PCLs for benzene and methylnaphthalene were revised so that PCLs were not lower than the PQL for the project laboratory (WAC 173-340-705[6]).
- 4. There is no MTCA Method A cleanup level specified for 1-methylnaphthalene; MTCA Method B cleanup level for direct contact with soil is 34.5 mg/kg.
- 5. The cleanup levels established for benzo(a)pyrene shall be used as the cleanup levels for mixtures of cPAHs (WAC 173-340-708[8][e]).
- 6. The preliminary cleanup level for TPH-G is 30 mg/kg if benzene is present, and 100 mg/kg if it is not present. Since benzene has been detected in site soils, the preliminary cleanup level is set to 30 mg/kg.

Abbreviations

c = carcinogenic

CAS = Chemical Abstracts Service

cPAH = carcinogenic polycyclic aromatic hydrocarbons

MTCA = Model Toxics Control Act

NA = not available

nc = noncarcinogenic

Table 5-3: GROUNDWATER PROTECTION CALCULATIONS¹

ExxonMobil/ADC Site, Ecology Site ID 2728 Everett, Washington

			Chem	ical Specific Con	C _s ⁵		
		C _w ²	K _{oc} ³	K _d ⁴		(Unsaturated)	C _s ⁵ (Saturated)
Chemical	CAS	(μg/L)	(ml/g)	(L/kg)	H _{cc} ⁵	(mg/kg)	(mg/kg)
Volatile Organic Compound	s						
Benzene	71-43-2	1.6	62	0.06	0.133	0.009	0.0006
Ethylbenzene	100-41-4	31	204	0.20	0.162	0.26	0.015
Xylenes ⁶	1330-20-7	310	233	0.233	0.138	2.8	0.16
Semivolatile Organic Compo	ounds						
Benzo(a)pyrene	50-32-8	0.1	9.70E+05	969	6.39E-06	1.9	0.1
1-methylnaphthalene	90-12-0	1.5	2.53E+03	2.53	1.59E-02	0.08	0.004
Total Petroleum Hydrocarbo	ons						
Diesel		500.00					
Gasoline	86290-81-5	800.00					
Heavy Oil		500.00					

Notes

- 1. Groundwater calculations provided by the Washington State Department of Ecology; Wood did not reproduce these calculations.
- 2. C_w values obtained from Table 5-1.
- 3. K_{oc} values obtained from the Washington State Department of Ecology CLARC online database.
- 4. K_d values were calculated using MTCA Equation 747-2.
- 5. Constants and soil concentration values were obtained from a letter by the Washington State Department of Ecology dated 4/9/2018. Use H_{rc} at 13 degrees Celsius.
- 6. Values used for o-xylene.

Abbreviations

-- = not available

 μ g/L = micrograms per liter

CAS = Chemical Abstracts Service

CLARC = Cleanup Levels and Risk Calculations

 C_s = soil concentration

C_w = groundwater preliminary cleanup level

H_{cc} = Henry's law constant (dimensionless)

 K_d = distribution coefficient

 K_{oc} = soil organic carbon-water partitioning coefficient

L/kg = liters per kilogram

mg/kg = milligrams per kilogram

ml/g = milliliters per gram

MTCA = Model Toxics Control Act

TABLE 6-1: GROUNDWATER SAMPLE ANALYTICAL RESULTS 1,2

ExxonMobil/ADC Property, Ecology Site ID 2728, Everett, Washington

Well ID		LPH-1	LPH-2	LPH-3	LPH-4	LPH-5	LPH-6	LPH-7	LPH-8	LPH-9	MW-10	MW-11	MW-19	MW-40R	MW-A1	MV	V-A2	MW-A3
																	01/05/2015	
Date Sampled	PCL	01/06/2015	01/06/2015	01/07/2015	01/07/2015	01/07/2015	01/07/2015	01/08/2015	01/08/2015	01/08/2015	01/06/2015	01/06/2015	01/05/2015	01/06/2015	01/06/2015	01/05/2015	FD	01/06/2015
TPH (μg/L)																		
TPH as Gasoline	800	100 U	100 U	100	100 U	100 U	100 U	100 U	140	390	290	100 U	130 NJ	610	100 U	110	110	100 U
TPH as Diesel	500	100 U	130	200	8,600	450	240	140	140	970	690	100 U	180 NJ	790	730 NJ	320	320	110 NJ
TPH as Motor Oil Range	500	100 U	100 U	100 U	4,100	230	100 U	100 U	130	180	100 U							
PAHs (μg/L)																		
Total cPAHs	0.1	0.0725 U	0.0717 U	0.0717 U	0.0717 U	0.0725 U	0.0717 U	0.0732 U	0.0717 U	0.0717 U	0.0725 U	0.0717 U	0.0725 U					
VOCs (µg/L)																		
Benzene	1.6	4.3	0.50 U															

Well ID		MW-A4	MW-A5	MW-A6	MW-A7	MW-A8	RW-2	Sump 1	Sump 2	W-1	W	-2	W-3	W-6	W-10R	W-15R	W-15R FD	W-17
												01/07/2015						
Date Sampled	PCL	01/06/2015	01/05/2015	01/05/2015	01/05/2015	01/05/2015	01/06/2015	01/08/2015	01/08/2015	01/07/2015	01/07/2015	FD	01/07/2015	01/08/2015	1/7/2015	01/08/2015	01/08/2015	01/08/2015
TPH (μg/L)																		
TPH as Gasoline	800	100 U	340	100 U	1,900	300	490 J	1,000 J	100 U	450	350	2,500	2,900 J	1,000				
TPH as Diesel	500	100 U	240	100 U	100 U	100 U	270	100 U	11,000	1,900	1,300	970	250	390	870	3,000	3,000	990
TPH as Motor Oil Range	500	100 U	2,900	230	100 U	100 U	100 U	100 U	150	100 U	100 U	290						
PAHs (μg/L)																		
Total cPAHs	0.1	0.0725 U	0.0717 U	0.0725 U	0.0717 U	0.0725 U	0.0725 U	0.0747 U	10.45	0.1712	0.0725 U	0.0717 U	0.0717 U	0.0732 U	0.0725 U	0.0717 U	0.0717 U	0.0725 U
VOCs (μg/L)																		
Benzene	1.6	0.50 U	0.53	0.50 U	0.72	0.50 U	0.50 U	1.9	2.1	0.50 U								

Notes:

1. Data qualifiers are as follows:

J = The result is an approximation.

NJ = The result is estimated and the identification is tentative due to a poor match with the reference standard.

U = not detected at or above the laboratory reporting limit shown.

2. Bolded values exceed the PCLs summarized on Table 5-1.

Abbreviations:

μg/L = micrograms per liter

cPAHs = carcinogenic polycyclic aromatic hydrocarbons

FD = field duplicate

PAHs = polycyclic aromatic hydrocarbons

PCL = preliminary cleanup level

TPH = total petroleum hydrocarbons

VOCs = volatile organic compounds

TABLE 6-2: HISTORY OF LNAPL RECOVERY AT THE SITE

ExxonMobil/ADC Property, Ecology Site ID 2728, Everett, Washington

LNAPL Activity	Date	Gallons of Water Recovered	Gallons of LNAPL Recovered	Comments
	5/12/1988	1,150	250	A 45-foot-long trench with two sumps constructed. Vacuum truck used to recover
May 1988 LNAPL Infiltration Trench	5/26/1988	1,200	50	water and LNAPL from sumps; diminishing recovery of LNAPL noted after two events.
March 1989 Groundwater Extraction and Treatment	March 1989 to March 1990	NA	NA	Groundwater extraction and treatment system was installed in the location of the May 1988 infiltration gallery. Fluid extraction at RW-1, a former monitoring well, and re-infiltration into a 190-foot long trench. Groundwater pumped at 2 to 3 gallons per minute. No LNAPL recovered or observed.
June 1989 Bailing	June to August 1989	NA	7	LNAPL noted in MW-8 and MW-18; wells bailed and limited LNAPL recovered.
December 1990 Test Pit Installation	December 1, 1993	NA	0	Five test pits installed to 4 feet below ground surface and blackish LNAPL was observed; insufficent LNAPL was present to allow for recovery of oil.
June 1996 LNAPL Vacuum Recovery Pilot Test	May to June 1996	28,228	125	After investigations identifed LNAPL in a number of borings, a 4-inch-diameter vacuum recovery well (VRW-1) was installed at the northeast corner of the ADC property. The system was operated in three modes—skimmer, vacuum, and depression mode—with greater submersion of a total fluids pump and higher vacuums. LNAPL recovery was variable and the the test ran for fourteen days.
June 1996 LNAPL Recovery Trench Pilot Test	June 1996	1,000s	0	Three test pits were installed with two monitoring wells. For the recovery test, one test pit and two wells were evacuated with a vacuum truck. No measureable LNAPL was observed in the wells or the selected test pit.
June 1996 CSO Dewatering	June 1996 to July 1996	1,450,800	23,050	City of Everett repairs to the CSO line in the former Everett Avenue ROW just south of the Kimberly Clark Building. Repairs were coordinated with a dewatering project to recover LNAPL from three dewatering wells. Dewatering began on June18 and continued through July 10. LNAPL daily production peaked at 7,550 gallons on June 21, 1996, and decreased asymmtotically to zero by July 4, 1996.
January 1997 LNAPL Bailing	January 1997	NA	12.33	LNAPL was hand-bailed from a series of eight wells over eight separate events.
LNAPL Interceptor Trench	January 1999 to Present	NA	None since March 2010	A 485-foot-long passive LNAPL recovery trench was installed along the western and northern sides of the Exxon-Mobil/ADC Property. The trench is 3 feet wide, approximately 4.5 feet deep, backfilled with permeable material, and uses a downgradient barrier to LNAPL migration (former concrete footings or 16-mil HDPE). The trench is equiped with nine LNAPL recovery wells. Since installation approximately 16 years ago, only trace quantities of LNAPL have been noted.
BNSF Soil Excavation	November 2010 to Mid-February 2011	1,489,246	6,019	Dewatering during excavation to approximately 10 feet deep. LNAPL recovered by vacuum truck during excavation as LNAPL accumulated on water surface within the excavation.
City of Everett Force Main	May 2012 through July 2012	3,000,000	unknown	Dewatering using dewatering points installed in fomer Everett Avenue toward the west and then south along Federal Avenue. The City did not record the volume of LNAPL recovered during this project.
Passive LNAPL Recovery from Wells and Sumps	March 2010 to August 2016	NA	33.9	Passive LNAPL recovery from wells, groundwater monitoring wells, and sumps frrom March 2010 through August 2016. Recovery methods including pumping oil from well, and using sorbent materials.

Abbreviations: BNSF = BNSF Railway Company City = City of Everett

CSO = combined sewer overflow HDPE = high density polyethylene LNAPL = light non-aqueous phase liquid

NA = not applicable ROW = right of way

TABLE 7-1: HYDRAULIC PARAMETERS FROM AQUIFER AND SLUG TESTS

ExxonMobil/ADC Property, Ecology Site ID 2728, Everett, Washington

Test Type	Well Name	Hydraulic Conductivity (cm/sec)	Transmissivity (gpd/ft)	Storativity ¹	Source	
	MW-10	1.84E-03	627	0.01	AGRA (drawdown at observation well) 2	
	MW-10	3.35E-03	1136	0.006	AGRA (recovery at observation well) 2	
Aquifer Test	MW-10	1.80E-03	608	0.008	AGRA (elastic response	
	MW-18	2.01E-03	685	0.004	at observation well) 2	
	RW-1	1.41E-03	482	0.34	AGRA (delayed response at pumping well) ²	
	MW-A1	2.65E-02				
Slug Test	MW-A5	6.35E-03			AMEC (rising head) ³	
_	MW-A6	9.28E-03				

Notes:

- 1. Storativity is dimensionless.
- 2. Undated AGRA pump test data included as an appendix to Remedial Investigation and Focused Feasibility Study, Mobil and ADC/Miller Properties, Everett, Washington (Exponent, 1998a).
- 3. Geometric mean of 5 slug test results (AMEC Earth & Environmental, 2010c).

Abbreviations

ADC = American Distributing Company AGRA = AGRA Earth & Environmental, Inc cm/sec = centimeters per second gpd/ft = gallons per day per foot of drawdown

TABLE 13-1: COMPARISON OF SOURCE AREA REMEDIATION ALTERNATIVES

Standards/Crite	ria	Alternative 1: LNAPL Area Excavation and Natural Source Zone Attenuation	Alternative 2: LNAPL Area Excavation and Source Area Stabilization	Alternative 3: Source Area Excavation		
	Pros	Removes accessible LNAPL for placement in an engineered landfill. Remaining source area soils are undisturbed, supporting natural source zone attenuation Controls are included to implement appropriate action if LNAPL remaining in inaccessible areas becomes mobilized.	Removes accessible LNAPL for placement in an engineered landfill. Stabilizes remaining source area soils and limits groundwater flow through the stabilized soil. Controls are included to implement appropriate action if LNAPL remaining in inaccessible areas becomes mobilized.	Removes source area soils with placement in an off- Site engineered landfill. Controls are included to implement appropriate action if LNAPL remaining in inaccessible areas becomes mobilized.		
Protectiveness	Cons	LNAPL and COCs would remain in inaccessible areas. COCs remain in unexcavated portion of source areas. Excavation could induce mobility in LNAPL outside the excavation area.	LNAPL and COCs would remain in inaccessible areas. Excavation could induce mobility in LNAPL outside the excavation area. Stabilization of source area soils would likely inhibit natural source zone attenuation and extend restoration time.	LNAPL and COCs would remain in inaccessible areas. Larger excavation than Alternative 1 and 2, therefore a greater risk of inducing mobility for LNAPL outside the excavation area.		
	Rating	8	8	9		
Permanence	Pros	Removes the accessible LNAPL for placement in an engineered landfill, reducing Site toxicity and impacted source area volume but not destroying contaminants. Natural source zone attenuation is expected to provide continued intrinsic degradation of LNAPL and COCs remaining after LNAPL excavation.	Removes the accessible LNAPL for placement in an engineered landfill, reducing Site toxicity and impacted source area volume but not destroying contaminants. Stabilizes remaining source area contamination to the extent practicable. Stabilization materials have long effective life. Natural source zone attenuation is expected to provide continued intrinsic degradation of LNAPL and COCs remaining in inaccessible areas.	Removes source area contamination to the extent practicable for placement in an engineered landfill, reducing Site toxicity and contaminant volume slightly more than Alternatives 1 and 2, but not destroying contaminants. Natural source zone attenuation is expected to provide continued intrinsic degradation of LNAPL and COCs remaining in inaccessible areas.		
	Cons	Affected soil would remain in source areas and LNAPL would remain in inaccessible areas.	Affected soil would remain in stabilized source area soils and in inaccessible areas. LNAPL would remain in the inaccessible areas. Stabilization of source area soils would likely inhibit natural source zone attenuation and extend restoration time.	Affected soil and LNAPL would remain on Site primarily in inaccessible areas.		
	Rating	8	8	9		

TABLE 13-1: COMPARISON OF SOURCE AREA REMEDIATION ALTERNATIVES

ExxonMobil/ADC Site, Ecology Site ID 2728 Everett, Washington

Standards/Criter	·ia	Alternative 1: LNAPL Area Excavation and Natural Source Zone Attenuation	Alternative 2: LNAPL Area Excavation and Source Area Stabilization	Alternative 3: Source Area Excavation
	Pros	Lowest cost estimate.	Second lowest cost estimate.	None.
Cost	Cons	Significant initial implementation cost. Long-term costs for response plans, maintenance, and monitoring.	Significant initial implementation cost. Highest cost. Long-term costs for response plans, maintenance, and monitoring.	Significant initial implementation cost, greater than lowest cost alternative. Long-term costs for response plans, maintenance, and monitoring.
	Rating	9	4	4
	Pros	The most highly contaminated material in source areas would be removed and placed in an off-Site landfill. Relies on intrinsic degradation processes for remediation of Site COCs and LNAPL (inaccessible areas) remaining after excavation.	The most highly contaminated material in source areas would be removed and placed in an off-Site landfill. Relies on intrinsic degradation processes for remediation of Site COCs and LNAPL (inaccessible areas) remaining after excavation. Soil stabilization uses natural components that have a long-term viability.	The most highly contaminated material in source areas would be removed and placed in an off-Site landfill. Relies on intrinsic degradation processes for remediation of COCs and LNAPL in inaccessible areas after excavation.
Long-Term Effectiveness	Cons	Long-term, active Site management would be required. Surface cover would require periodic maintenance. Limited soil contamination would remain in source areas until fully degraded. Long-term response plans and institutional controls would be required to address remaining affected soil and/or LNAPL outside of excavation and in the inaccessible areas.	Long-term, active management would be required. Surface cover would require periodic maintenance. Long-term response plans and institutional controls would be required to address remaining affected soil and/or LNAPL outside of excavation and in the inaccessible areas. Stabilized soil would likely hinder natural degradation processes for remaining COCs in source areas.	Long-term, active Site management would be required. Long-term response plans and institutional controls would be required to address remaining affected soil and/or LNAPL in the inaccessible areas.
	Rating	7	7	8
	Pros	Reduced potential for short-term risk relative to Alternatives 2 and 3 due to smaller construction/transportation requirements. Proven construction methodologies are available to mitigate potential short-term risks during work.	Proven construction methodologies are available to mitigate short-term risks during work.	Reduced potential for short-term risk relative to Alternative 2 due to single construction method. Proven construction methodologies are available to mitigate short-term risks during work.
Management of Short- Term Risks	Cons	Significant excavation, with significant potential for releases to air and surface water during construction and transportation and with significant potential for worker exposure. Significant potential to adversely affect adjacent improvements. Shoring would be required to mitigate risks of structural failure.	Significant excavation, with significant potential for releases to air and surface water during construction and transportation, and with significant potential for worker exposure. Significant potential to adversely affect adjacent improvements. Shoring would be required to mitigate risks of structural failure. Soil mixing creates substantial potential for worker exposure. Added complexity of implementing two different remedial techniques. Two separate mobilizations required using two different sets of equipment.	Larger excavation than Alternative 1, with greater potential for releases to air and surface water during construction and increased potential for worker exposure. Increased transportation increases short-term risks. Greater potential to adversely affect adjacent improvements; increased shoring would be required compared to Alternative 1 to mitigate risks of structural failure.
	Rating	8	4	4

TABLE 13-1: COMPARISON OF SOURCE AREA REMEDIATION ALTERNATIVES

ExxonMobil/ADC Site, Ecology Site ID 2728 Everett, Washington

Standards/Crite	ria	Alternative 1: LNAPL Area Excavation and Natural Source Zone Attenuation	Alternative 2: LNAPL Area Excavation and Source Area Stabilization	Alternative 3: Source Area Excavation
	Pros	Somewhat less invasive than Alternative 3. Could be implemented with local contractors. Natural source zone attenuation is non-invasive and can be readily implemented.	Portions of the work could be performed by local contractors. Soil stabilization is a frequently used technology. Natural source zone attenuation is non-invasive and can be readily implemented.	Could be implemented with local contractors. Natural source zone attenuation is non-invasive and can be readily implemented.
Technical and Administrative Implementability	Cons	Excavation would be difficult due to Site conditions. Requires excavation through water, increasing the potential for releases to adjacent properties or surface water. Groundwater management would be difficult; permitting and safeguards would be difficult to implement. Requires agreements with City of Everett, Port of Everett, and KC property owner concerning remaining LNAPL in inaccessible areas. Potential for inducing LNAPL movement from inaccessible areas.	Excavation would be difficult due to Site conditions. Requires excavation through water, increasing the potential for releases to adjacent properties or surface water. Groundwater management would be difficult; permitting and safeguards would be difficult to implement. Requires agreements with City of Everett, Port of Everett, and KC property owner concerning remaining LNAPL in inaccessible areas. Potential for inducing LNAPL movement from inaccessible areas. Specialty contractor and equipment would be needed for soil stabilization. Second mobilization would be required. Site-specific pilot testing has not been completed.	Excavation would be difficult due to Site conditions. Requires excavation through water, increasing the potential for releases to adjacent properties or surface water. Groundwater management would be difficult; permitting and safeguards would be difficult to implement. Requires agreements with City of Everett, Port of Everett, and KC property owner concerning remaining LNAPL in inaccessible areas. Higher potential for inducing LNAPL movement from inaccessible areas than Alternatives 1 & 2.
	Rating	9	4	6
Public Concerns	Pros	Expected to be accepted by public. Some concern may result due to contamination left in soil/source areas and inaccessible areas and the long-term risk management approach.	Expected to be accepted by public. Some concern may result due to contamination left in soil/source areas and inaccessible areas and the long-term risk management approach. Greatest amount of construction related traffic. Port of Everett will likely not permit ISS on port property.	Expected to be accepted by public. Some concern may result due to contamination in inaccessible areas and the long-term risk management approach. Community concern may result due to increased truck transportation relative to Alternative 1.
	Rating	8	4	7
Restoration	Pros	Shortest initial construction time. Partial removal of source area contamination may somewhat shorten restoration time. Source area COCs remaining after implementation are expected to attenuate by natural processes. LNAPL and COCs in inaccessible areas are expected to slowly degrade by natural degradation processes.	Partial removal and ISS of source area contamination would be completed in a short time, but slightly longer than for Alternative 1. COCs remaining in source areas after implementation would have reduced mobility. LNAPL and COCs in inaccessible areas are expected to slowly degrade by natural degradation processes.	Removal of source area contamination may somewhat shorten Site restoration time. LNAPL and COCs in inaccessible areas are expected to slowly degrade by natural degradation processes.
Time Frame	Cons	Site COCs would remain in source areas and inaccessible areas following remediation activities and slowly attenuate by natural degradation processes. LNAPL would remain in inaccessible areas and slowly attenuate by natural degradation	Construction time longer than Alternative 1 and longer than Alternative 3. Site COCs and/or LNAPL would remain in the inaccessible areas following remediation activities. COCs would remain in source areas for an extended time. Stabilized soil may slightly hinder natural attenuation processes for	Construction time longer than Alternative 1. Site COCs and/or LNAPL would remain within inaccessible areas following active remediation.
	Rating	processes.	COCs in source area.	7

TABLE 13-1: COMPARISON OF SOURCE AREA REMEDIATION ALTERNATIVES

ExxonMobil/ADC Site, Ecology Site ID 2728 Everett, Washington

Standards/Criteria		Alternative 1: LNAPL Area Excavation and Natural Source Zone Attenuation	Alternative 2: LNAPL Area Excavation and Source Area Stabilization	Alternative 3: Source Area Excavation
	Pros	Resource use for excavation and transportation is lower than for Alternatives 2 and 3. Non-invasive processes applied for remediation of portion of source areas and inaccessible areas.	Resource use is comparable to Alternative 3. Non-invasive processes applied for remediation of inaccessible areas.	Resource use is comparable to Alternative 2. Non-invasive processes applied for remediation of inaccessible areas.
Sustainability	Cons	Significant requirements for waste transportation and use of landfill capacity for disposal. Requires long-term monitoring program for remaining LNAPL and COCs in source areas and inaccessible areas.	Significant requirements for waste and material transportation and significant use of landfill capacity for disposal. Requires long-term monitoring program for remaining LNAPL and COCs in the source areas and inaccessible areas.	Greatest requirements for waste transportation and landfill capacity for disposal. Requires long-term monitoring program for remaining LNAPL and COCs in the inaccessible areas.
	Rating	8	6	4
RATING TOTAL		72	51	58
OVERALL BENEFIT		63	47	54

Notes:

Comparison Ratings:

10 = Exceptional. This rating indicates an alternative fully achieves the criterion.

5 = Medium. Alternative partially achieves the requirements for the criterion.

1 = Very Low. The alternative does not achieve the requirements for the criterion.

Rating total = sum of ratings for all nine criteria. Overall benefit = sum of rating for all criteria except cost

Abbreviations:

COC = contaminants of concern

KC = Kimberly-Clark Corporation

LNAPL = light nonaqueous phase liquid

TABLE 13-2: PRELIMINARY COST ESTIMATE FOR SOURCE AREA ALTERNATIVES

ExxonMobil/ADC Property, Ecology Site ID 2728 Everett, Washington

			Excavation	I: LNAPL Area and Natural e Attenuation	Excavatio	2: LNAPL Area n and Source tabilization		3: Source Area
Description	Rate ¹	Units	Quantity htractor Cost	Cost	Quantity	Cost	Quantity	Cost
Mobilization/Demobilization	\$100,000	LS	4	\$400,000	6	\$600,000	5	\$500,000
Site Setup	\$50,000	LS	2	\$100,000		\$150,000	3	\$150,000
Structures Removal and Restoration	\$75,000	LS	2	\$150,000		\$225,000	3	\$225,000
Soil Stabilization (1% bentonite, 10% cement)	\$57	CY	0	\$0	3,400	\$194,000	0	\$0
Existing Asphalt Removal	\$12	CY	900	\$11,000	1,100	\$14,000	1,100	\$14,000
Asphalt Paving	\$140	TON	1,800	\$252,000		\$308,000	2,200	\$308,000
Soil Excavation (including sloping)	\$17	CY	22,700	\$386,000	22,700	\$386,000	23,200	\$395,000
Stockpile/placement of clean sloping for fill	\$10	CY	2,500	\$25,000		\$25,000	2,200	\$22,000
Backfill Import	\$26	TON	30,900	\$804,000		\$749,000	34,900	\$908,000
Soil Transport & Disposal	\$87	TON	30,900	\$2,689,000		\$2,654,000	34,900	\$3,037,000
Sheet Pile Shoring	\$33	SF	26,200	\$865,000		\$865,000	36,000	\$1,188,000
Stormwater Treatment System Operation	\$43,000	MO	4	\$172,000		\$215,000	5	\$215,000
Security Fence	\$38	LF	600	\$23,000		\$23,000	600	\$23,000
SUBTOTAL	Ψ50	Li	000	\$5,877,000		\$6,408,000	000	\$6,985,000
Sales Tax	9.7	%		\$570,000		\$622,000		\$678,000
CONTRACTOR COST	5.1	70		\$6,447,000		\$7,030,000		\$7,663,000
CONTRACTOR COST		Cor	sultant Cost	\$0,1 11 ,000		Ψ1,030,000		Ψ1,003,000
Field Investigation	\$100,000	LS	1	\$100,000	2	\$200,000	1	\$100,000
Access Agreements	\$100,000	LS	1	\$100,000		\$100,000	1	\$100,000
Well Abandonment	\$800	LS	20	\$16,000		\$16,000	20	\$16,000
Surveying	\$2,300	Day	15	\$35,000		\$35,000	15	\$35,000
Design	\$50,000	LS	3	\$150,000		\$200,000	3	\$150,000
Permitting	\$40,000	LS	2	\$80,000		\$80,000	2	\$80,000
Project Management	\$2,500	MO	20	\$50,000		\$50,000	20	\$50,000
Sampling and Analysis	\$50,000	LS	2	\$100,000		\$200,000	3	\$150,000
Archeological Oversite	\$5,000	LS	1	\$5,000		\$5,000	1	\$5,000
Construction Management	\$15,000	WK	20	\$300,000		\$420,000	28	\$420,000
Construction Report	\$50,000	LS	1	\$50,000		\$100,000	1	\$50,000
Institutional Controls	\$75,000	LS	1	\$75,000		\$75,000	1	\$75,000
Risk Management Planning	\$60,000	LS	1	\$60,000		\$60,000	1	\$60,000
CONSULTANT COST	Ψ00,000	LJ	'	\$1,121,000	'	\$1,541,000	'	\$1,291,000
CAPITAL COST SUBTOTAL				\$7,568,000		\$8,571,000		\$8,954,000
CONTINGENCY	1	%	10	\$757,000		\$1,286,000	10	\$895,000
TOTAL CAPITAL COST	'	70	10	\$8,325,000		\$9,857,000		\$ 9,849,000
TOTAL CAPITAL COST		Onorotion	and Mainten			\$3,031,000		\$3,043,000
Vocas 1 through F		operation	i and iviainten	lance				
Years 1 through 5	¢ 500	ГА	25	#10 F00	25	#40.500	25	#42.500
NSZA Rate Measurements	\$500	EA	25	\$12,500		\$12,500	25	\$12,500
Gauging & Bailing	\$1,300	EA	60	\$78,000		\$78,000		\$78,000
Non-Hazardous Oil Disposal	\$250	Drum	10	\$2,500		\$2,500	10	\$2,500
Project Management	\$29,000	Annual	5	\$145,000	5	\$145,000	5	\$145,000
Years 6 through 50	***			****		***		***
Gauging & Bailing	\$1,300	EA	175	\$227,500		\$227,500	175	\$227,500
Non-Hazardous Oil Disposal	\$250	Drum	55	\$13,800		\$13,800	55	\$13,800
NSZA Rate Measurements	\$500	EA	50	\$25,000		\$25,000	50	\$25,000
Project Management	\$6,000	Annual	45	\$270,000		\$270,000	45	\$270,000
O&M COST SUBTOTAL				\$761,800		\$761,800		\$761,800
Contingency	1	%	10	\$76,000		\$114,000	10	\$76,000
TOTAL O&M COST				\$837,800		\$875,800		\$837,800
TOTAL ESTIMATED COST				\$9,163,000		\$10,733,000		\$10,687,000
50 Year NPV (1.6% net discount rate)				\$8,788,000		\$10,295,000		\$10,271,000

<u>Notes</u>

1. Rates are in 2019 US dollars.

Abbreviations:

CY = cubic yard EA = each

LF = linear feet

LS = lump sum MO = month NPV = net present value

NSZA = natural source zone attentuation O&M = operation and maintenance

SF = square feet

WK = week

TABLE 13-3: COMPARISON OF GROUNDWATER REMEDIATION ALTERNATIVES

ExxonMobil/ADC Site, Ecology Site ID 2728 Everett, Washington

Standards/Crite	eria	Alternative 1: Monitored Natural Attenuation	Alternative 2: Funnel and Gate
Pros		Protective of human health and the environment. Intrinsic biodegradation is active at Site and is presently achieving PCLs at proposed CPOC. Relies on natural constituent degradation processes that are currently active at Site.	Protective of human health and the environment. Provides more robust means to remove groundwater COCs. Combines engineered component with ongoing natural attenuation processes.
Protectiveness	Cons	Effectiveness must be maintained for long-term attenuation of COCs from inaccessible areas.	Requires long-term operation and maintenance to maintain effectiveness. Could decrease effectiveness of natural attenuation process by removing substrate from groundwater. Inaccessible areas would require long-term maintenance of engineered components.
	Rating	8	7
	Pros	Permanently destroys or reduces toxicity of COCs by natural processes. Natural attenuation is currently active at the Site.	Immobilizes COCs on sorbent media. Destroys or reduces toxicity of non-adsorbed COCs by natural processes.
Permanence	Cons	Relies on natural environmental conditions that could change.	Relies on active maintenance and natural environmental conditions that could change. Implementation time would be associated with funnel and gate construction.
	Rating	9	7
	Pros	Lower cost than Alternative 2. Total cost less than half of Alternative 2.	None. High cost alternative.
Cost	Cons	Long-term monitoring required to confirm effectiveness.	Long-term monitoring and maintenance required to maintain and confirm effectiveness. Construction cost substantially higher than Alternative 1.
	Rating	9	4
	Pros	Intrinsic biodegradation is effective at present for releases that occurred more than 50 years ago and is expected to remain effective in the future due to reliance on indigenous organisms and natural processes.	Proven technologies used for this alternative that are known to be effective. The PRB has a fixed life but is backed up by MNA.
Long-Term Effectiveness	Cons	No active control over natural attenuation rate.	Active maintenance required to maintain effectiveness of sorbent media in the PRB. The PRB may affect intrinsic biodegradation downgradient of the funnel and gate due to altering the substrate composition in that area.
	Rating	9	6
	Pros	Very limited construction required for implementation, thereby minimal potential for short-term risk.	Funnel and gate construction occurs in area with fairly low levels of groundwater contamination.
Management of Short-Term Risks	Cons	Minor potential for short-term risk due to installation of monitoring wells.	Excavation required for installation of funnel and gate system, creating short-term health and safety risks during implementation.
	Rating	9	6
	Pros	Simple alternative that can be implemented within 1–2 days by multiple local contractors, with minimal permitting requirements and access agreements that already have been negotiated.	Proven technologies that can be readily installed by specialty contractors.
Technical and Administrative Implementability	Cons	Access agreements required for monitoring wells and CPOC.	Construction occurs on third party property and within active industrial areas, requiring more complex access agreements and scheduling to avoid adversely affecting ongoing industrial operations. Access agreements required for monitoring wells and CPOC. Ongoing access needed to inspect and maintain funnel and gate.
	Rating	8	5
	Pros	Expected to be accepted by public.	Expected to be accepted by public.
Public Concerns	Cons	May be some concern due to reliance on intrinsic biodegradation, a passive remedy.	May be some concern due to ultimate reliance on a passive remedy.
	Rating	7	7
Restoration	Pros	Natural attenuation is currently achieving cleanup standard at anticipated CPOC.	Natural attenuation is currently achieving cleanup standard at anticipated CPOC.
Time Frame	Cons	None. Natural attenuation has been effective at Site.	Funnel and gate would not affect restoration time frame.
	Rating	9	9

TABLE 13-3: COMPARISON OF GROUNDWATER REMEDIATION ALTERNATIVES

ExxonMobil/ADC Site, Ecology Site ID 2728 Everett, Washington

Standards/Criteria		Alternative 1: Monitored Natural Attenuation	Alternative 2: Funnel and Gate	
	Pros	Minimal requirements for materials, equipment, and transportation to implement this alternative. Remedy relies on natural, passive processes that are already active at Site.	Readily available materials are used for remedy construction. The remedy operates using a combination of natural processes and a engineered component that requires limited active operation.	
Sustainability	Cons	None. Natural attenuation has been effective at Site.	The PRB requires active monitoring and maintenance to ensure effectiveness. A significant amount of waste would be generated from construction that would require off-Site transportation and disposal. Additional waste generation may occur in the future due to maintenance of the PRB.	
Rating		9	6	
RATING TOTAL		77	57	
OVERALL BENEFIT		68	53	

Notes:

Comparison Ratings:

- 10 = Exceptional. This rating indicates an alternative fully achieves the criterion.
- 5 = Medium. Alternative partially achieves the requirements for the criterion.
- 1 = Very Low. The alternative does not achieve the requirements for the criterion.

Rating total = sum of ratings for all nine criteria. Overall benefit = sum of rating for all criteria except cost

Abbreviations:

COC = constituent of concern

CPOC = conditional point of compliance

MNA = monitored natural attenuation

PCL = preliminary cleanup level

PRB = permeable reactive barrier

TABLE 13-4: PRELIMINARY COST ESTIMATE FOR GROUNDWATER ALTERNATIVES

ExxonMobil/ADC Property, Ecology Site ID 2728 Everett, Washington

Description	Pata	Units	Moni Natural A	ative 1: itored ttenuation	Alternative 2: Funnel and Gate		
Description	Rate		Quantity	Cost	Quantity	Cost	
		ntractor Cost					
Mobilization/Demobilization	\$50,000	LS		\$0	1	\$50,000	
Site Setup	\$20,000	LS		\$0	1	\$20,000	
Structure Removal and Restoration	\$150,000	LS		\$0	1	\$150,000	
Low Permeability Barrier Wall	\$25	SF		\$0	5,250	\$132,000	
Low Permeability Barrier Import	\$21	TON		\$0	1,200	\$26,000	
Reactive Barrier Vault	\$50,000	EA		\$0	1	\$50,000	
Reactive Media	\$2,500	TON		\$0	80	\$200,000	
Asphalt Paving	\$140	TON		\$0	70	\$10,000	
Soil Transport & Disposal	\$87	TON		\$0	2,400	\$209,000	
SUBTOTAL				\$0		\$847,000	
Sales Tax	9.7	%		\$0		\$82,200	
CONTRACTOR COST				\$0		\$929,200	
		sultant Cost					
Field Investigation	\$25,000	LS	0	\$0	1	\$25,000	
Monitoring Well Installation	\$2,500	EA	1	\$3,000	1	\$3,000	
Surveying	\$2,000	Day	1	\$2,000	3	\$6,000	
Design	\$60,000	LS	0	\$0	1	\$60,000	
Permitting	\$20,000	LS	0	\$0	1	\$20,000	
Project Management	\$2,500	МО	1	\$2,500	4	\$10,000	
Sampling and Analysis	\$10,000	LS	1	\$10,000	2	\$20,000	
Construction Management	\$15,000	WK	0.5	\$8,000	8	\$120,000	
Construction Report	\$5,000	LS	1	\$5,000	4	\$20,000	
CONSULTANT COST				\$30,500		\$284,000	
CAPITAL COST SUBTOTAL				\$30,500		\$1,213,200	
CONTINGENCY	10	%		\$3,000		\$121,000	
TOTAL CAPITAL COST				\$34,000		\$1,334,000	
	Monitoring	and/or Maint	enance				
Years 1 through 5							
Reactive Media Excavation and Disposal	\$30,000	Round	0	\$0	0	\$0	
Reactive Barrier Media Replacement	\$50,000	Annual	0	\$0	0	\$0	
IDW Disposal	\$1,000	Annual	5	\$5,000	5	\$5,000	
Groundwater Monitoring	\$15,000	EA	10	\$150,000	10	\$150,000	
Reports	\$5,100	EA	10	\$51,000	10	\$51,000	
Project Management		Annual	5	\$0	5	\$0	
Years 6 through 50							
Reactive Barrier Excavation and Disposal	\$30,000	Annual	0	\$0	3	\$90,000	
Reactive Barrier Media Replacement	\$50,000	Annual	0	\$0	3	\$150,000	
IDW Disposal	\$500	Annual	15	\$7,500	15	\$7,500	
Well Maintenance	\$2,000	EA	10	\$20,000	10	\$20,000	
Groundwater Monitoring	\$15,000	EA	15	\$225,000	15	\$225,000	
Reports	\$5,100	EA	15	\$76,500	15	\$76,500	
Well Decommissioning	\$600	EA	16	\$9,600	16	\$9,600	
Project Management		Annual	15	\$0	15	\$0	
O&M COST SUBTOTAL				\$544,600		\$784,600	
Contingency	10	%		\$54,460		\$78,460	
TOTAL O&M COST				\$599,060		\$863,060	
TOTAL ESTIMATED COST				\$633,000		\$2,197,000	
50 Year NPV (1.6% net discount rate)				\$545,000		\$2,063,000	

Abbreviations:

EA = each IDW = investigation-derived waste

LS = lump sum MO = month

NPV = net present value

O&M = operation and maintenance

SF = square feet WK = week

TABLE 14-1: DISPROPORTIONATE COST ANALYSIS FOR REMEDIATION ALTERNATIVES

ExxonMobil/ADC Site, Ecology Site ID 2728 Everett, Washington

		Sou	urce Area Alternatives		Groundwater Alternatives		
	ltem	1: LNAPL Area Excavation and Natural Source Zone Attenuation	2: LNAPL Area Excavation and Source Area Stabilization	3: Source Area Excavation	1: Monitored Natural Attenuation	2: Funnel and Gate	
		Description of A	Alternatives ¹				
	Total Estimated NPV Cost ² (2019 \$) ³	\$8,788,000	\$10,295,000	\$10,271,000	\$545,000	\$2,063,000	
v	Institutional Controls	Yes	Yes	Yes	Yes	Yes	
ent	Engineering Controls	Yes	Yes	Yes	No	Yes	
pod	Contamination left in place	Yes	Yes	Yes	Yes	Yes	
Components	Waste Disposal Off Site (tons)	30,900	30,500	34,900	Minimal	2,400	
	LNAPL Recovery	Yes	Yes	Yes	No	No	
	LNAPL Removal during Construction (gal)	1,000	1,000	1,200	Minimal	Minimal	
		Disproportionate	Cost Analysis				
	Criteria	Score ⁴	Score ⁴	Score ⁴	Score ⁴	Score ⁴	
Б	Protectiveness	8	8	9	8	7	
Ranking	Permanence	8	8	9	9	7	
Ra	Long-Term Effectiveness	7	7	8	9	6	
efits o	Management of Short-Term Risks	8	4	4	9	6	
Benefits parison	Technical and Administrative Implementability	9	4	6	8	5	
	Public Concerns	8	4	7	7	7	
	Restoration Time Frame	7	6	7	9	9	
& Relative Comp	Sustainability	8	6	4	9	6	
DCA 8	Overall Benefit Rating	63	47	54	68	53	
Δ	Ratio of Cost/Benefit	\$139,000	\$219,000	\$190,000	\$8,000	\$39,000	

Notes:

- 1. The comprehensive Site remedy will consist of one soil/source area alternative and one groundwater alternative.
- 2. 50 years, 1.6 percent net discount rate.
- 3. Amounts are in 2019 US dollars.
- 4. Comparison Ratings:
 - 10 = Exceptional. This rating indicates an alternative fully achieves the criterion.
 - 5 = Medium. Alternative partially achieves the requirements for the criterion.
 - 1 = Very Low. The alternative does not achieve the requirements for the criterion.

Overall benefit = sum of rating for all criteria except cost

Abbreviations:

DCA = disproportionate cost analysis

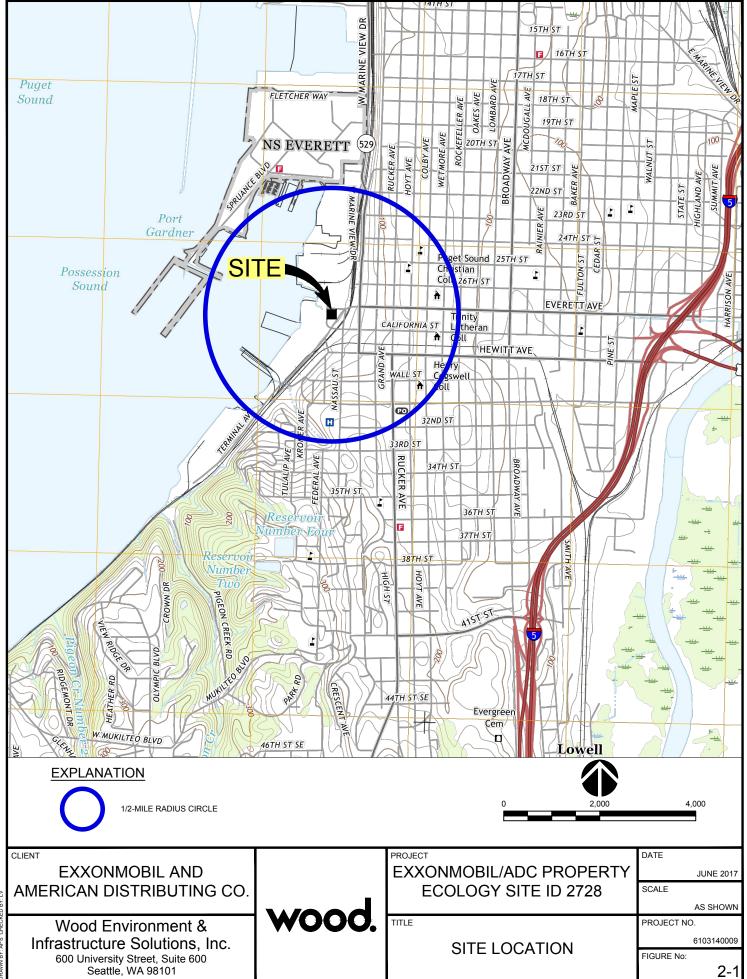
gal = gallons

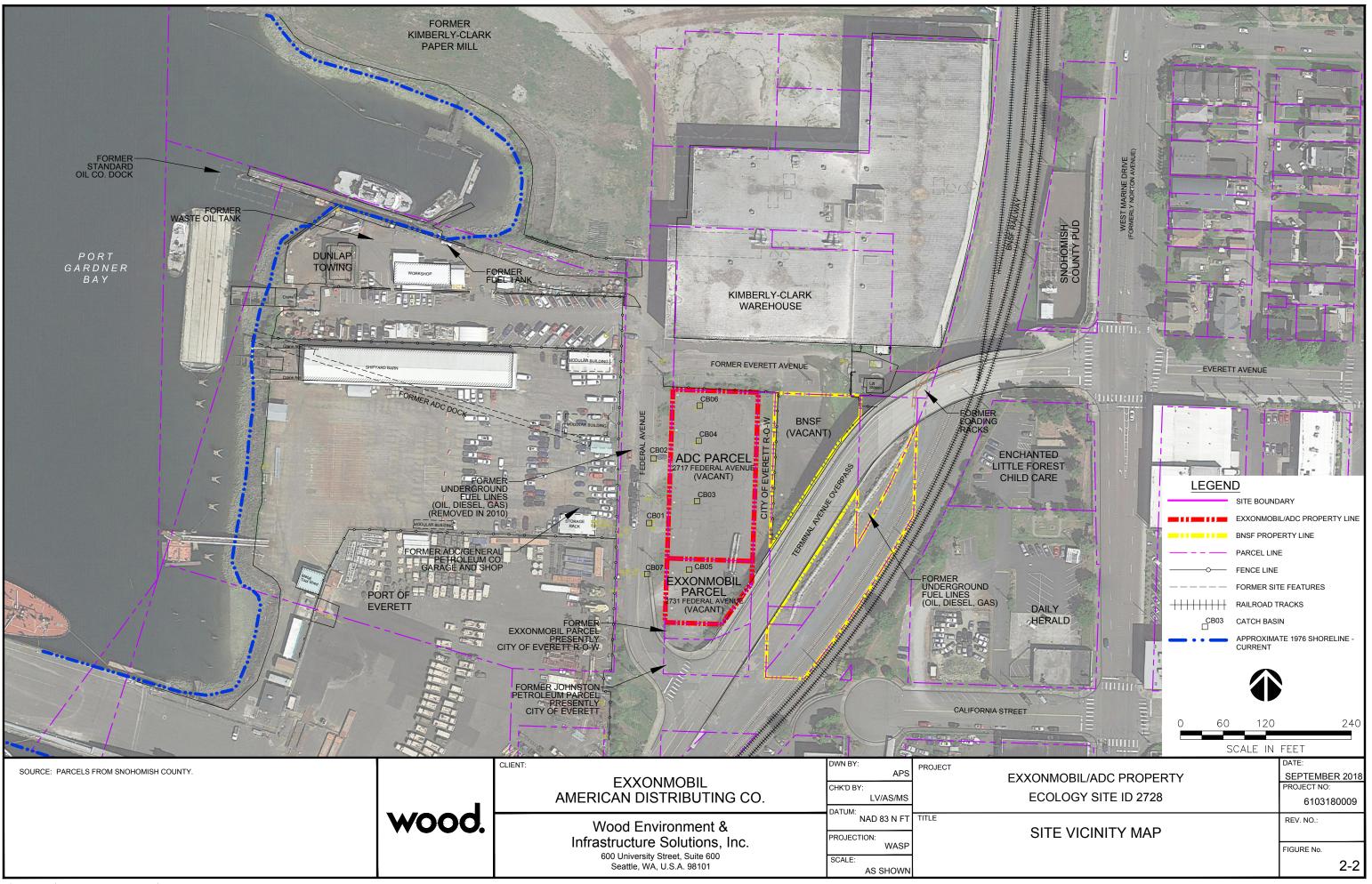
LNAPL = light nonaqueous phase liquid

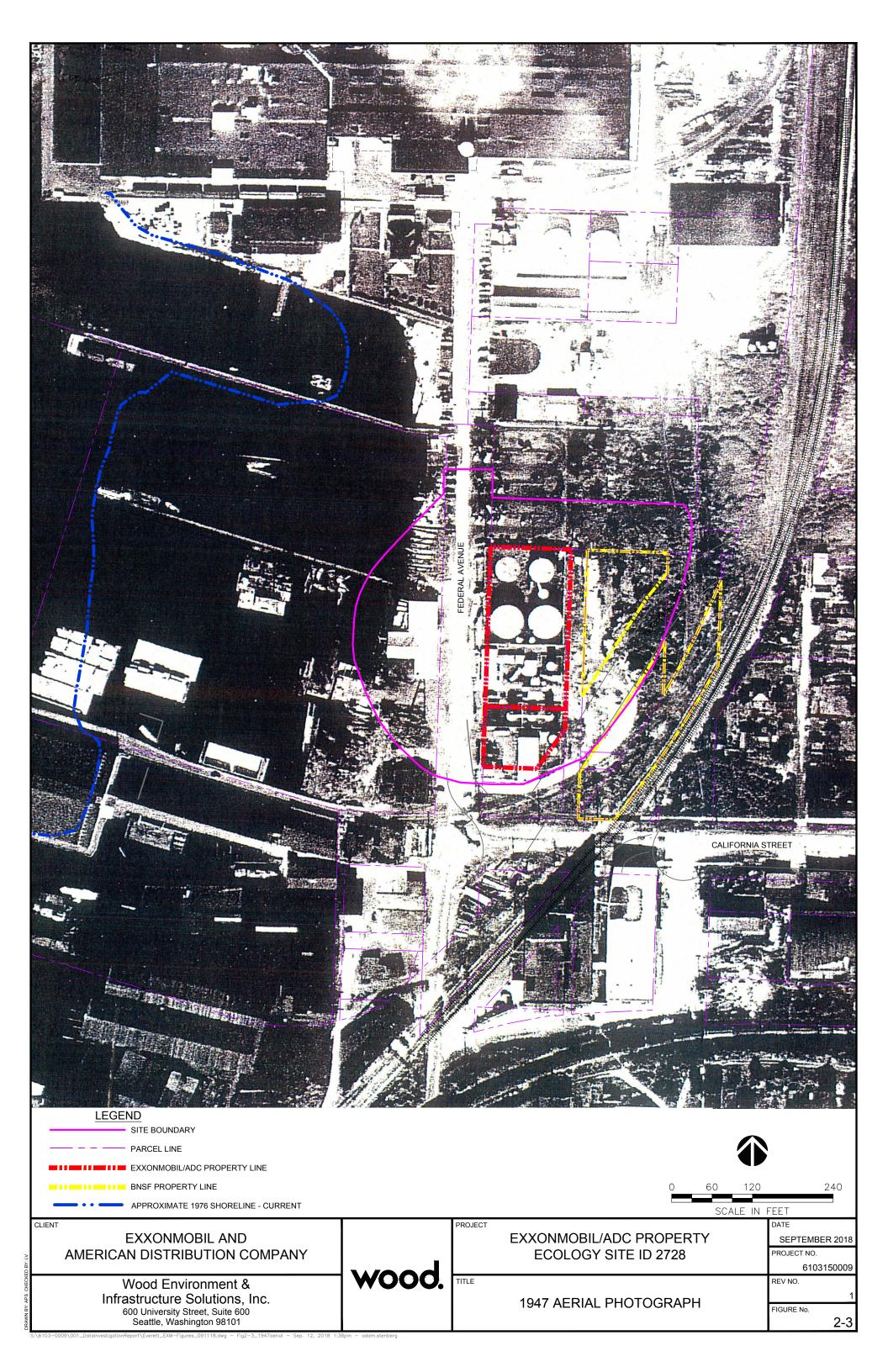
NPV = net present value

Wood Environment & Infrastructure Solutions, Inc.

FIGURES



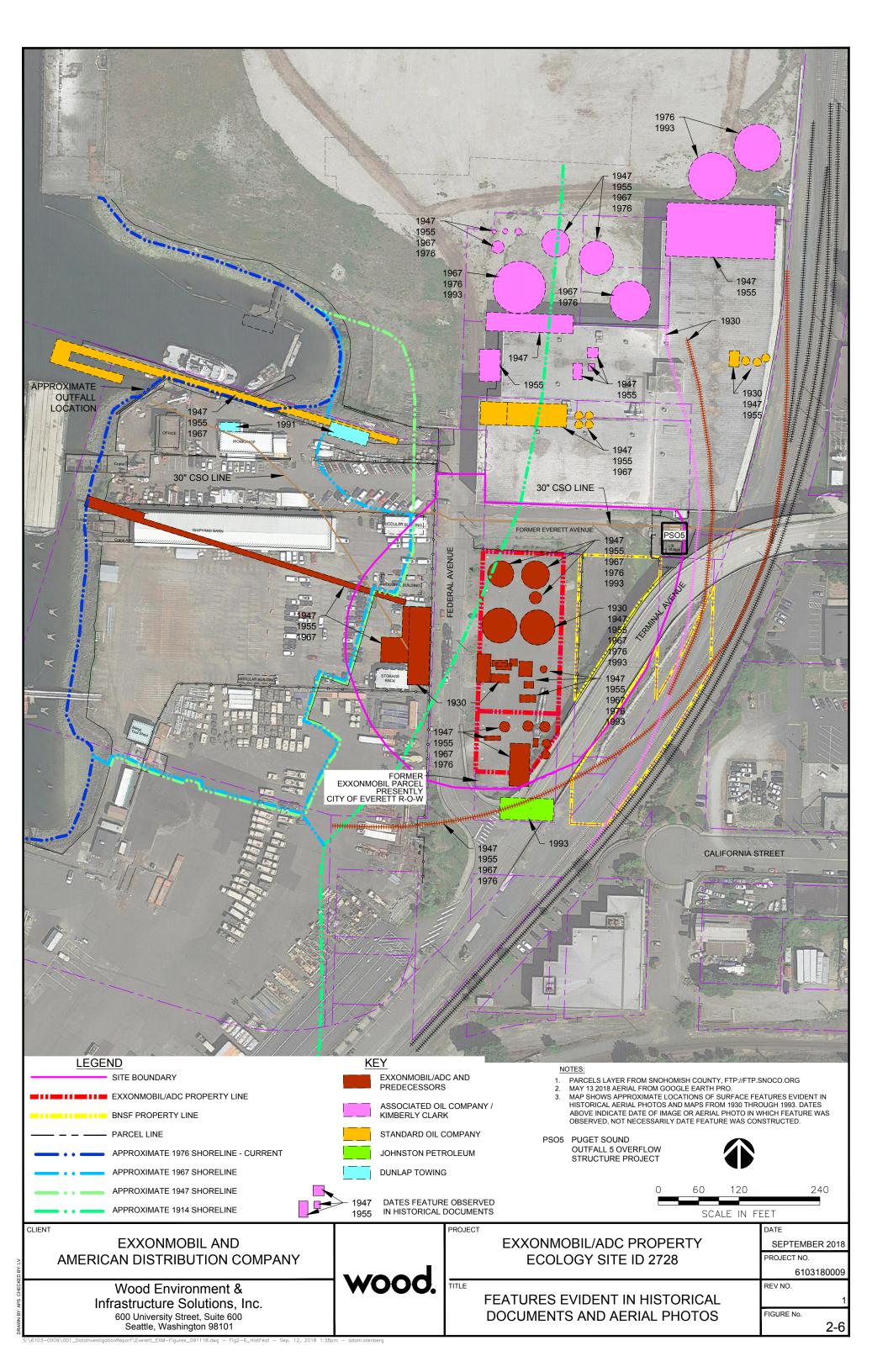


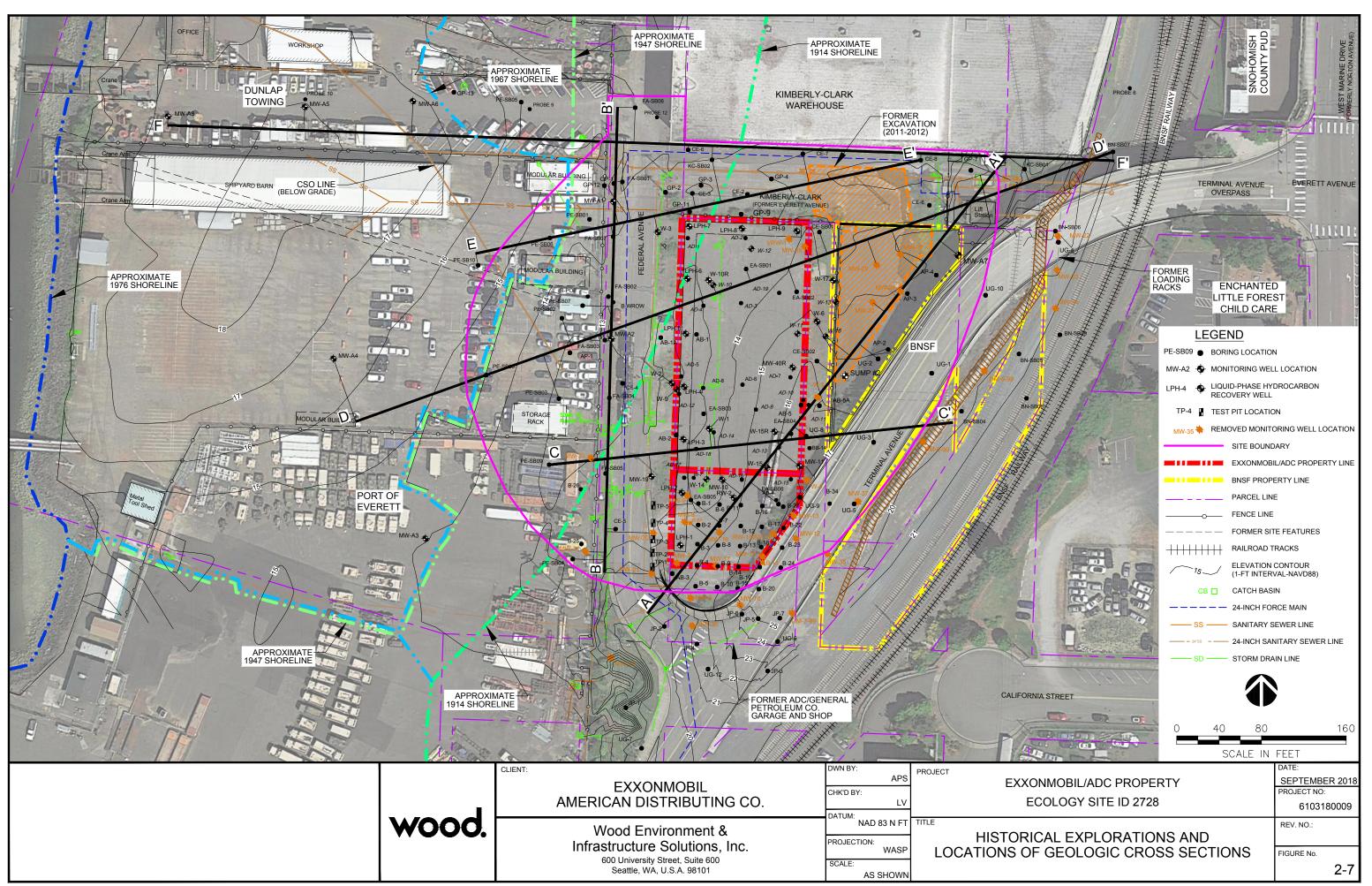


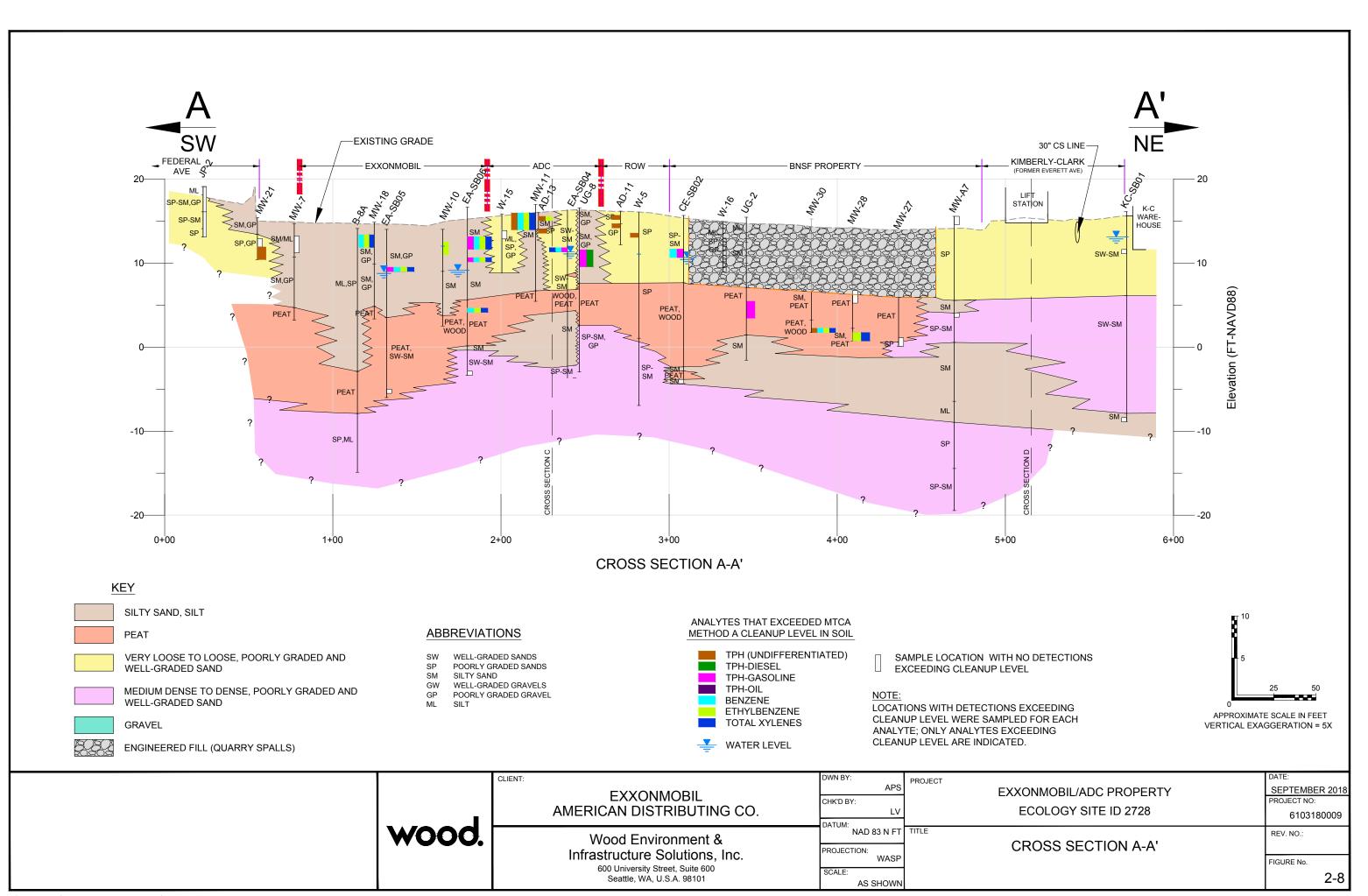


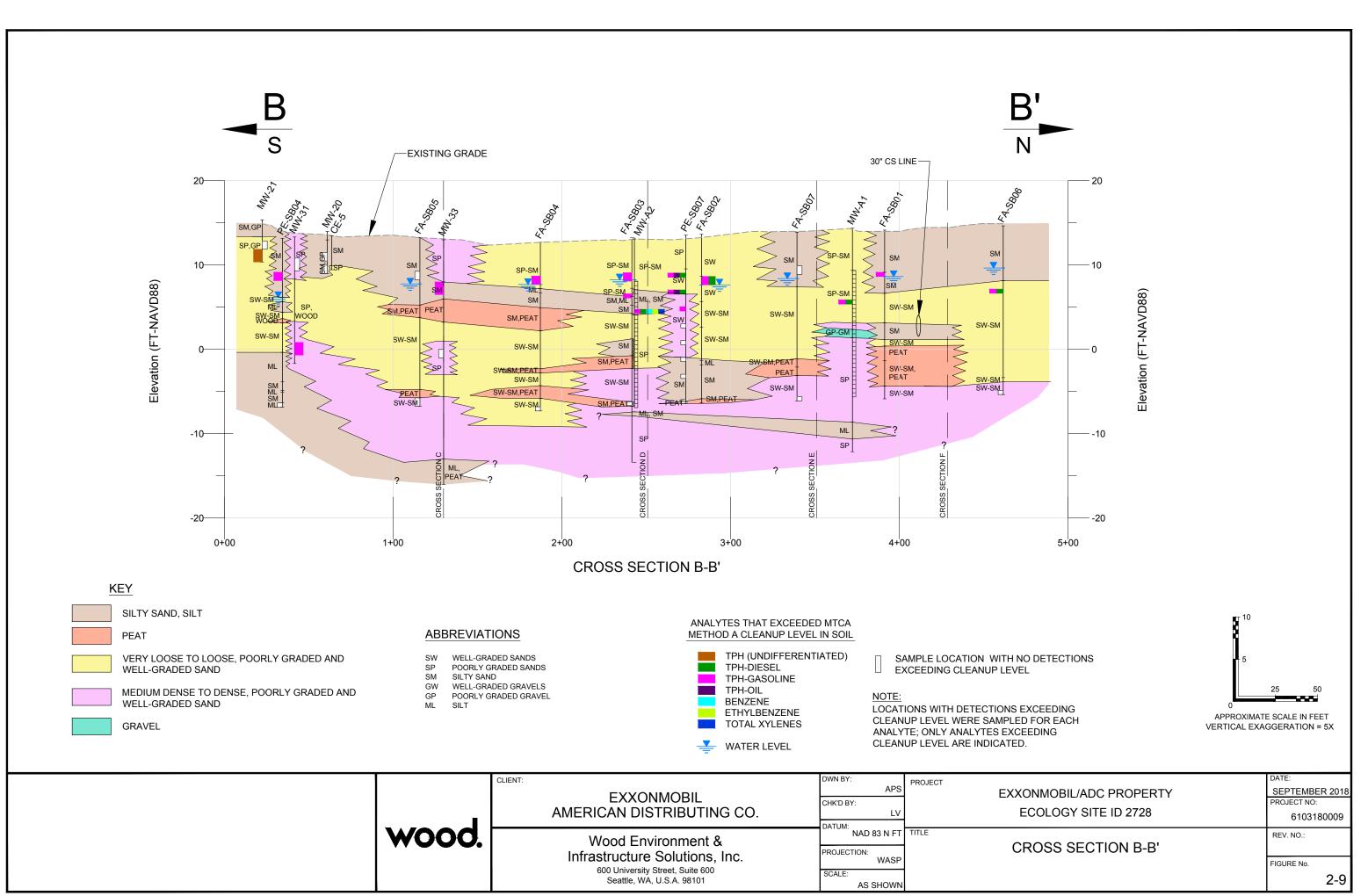


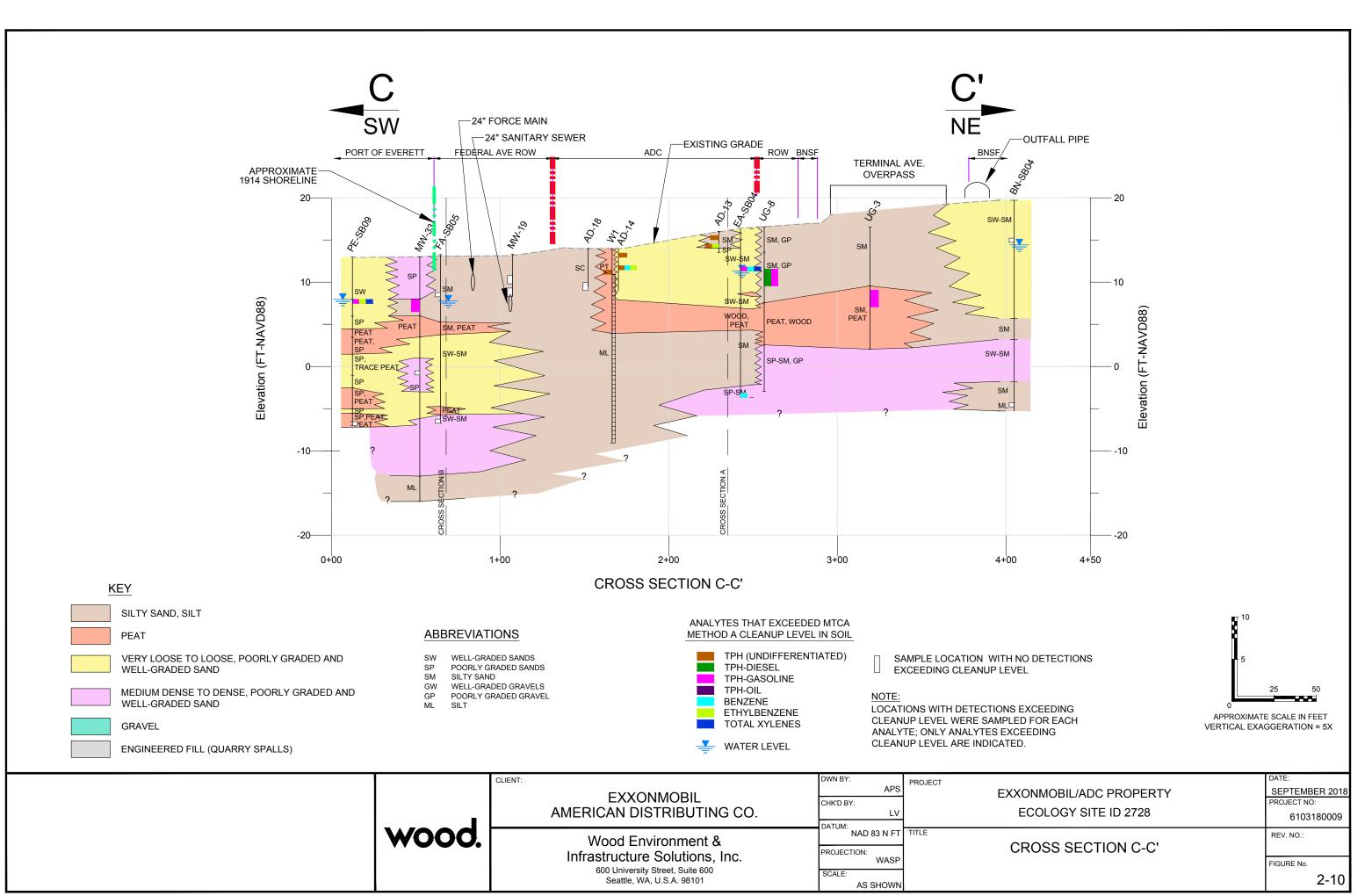
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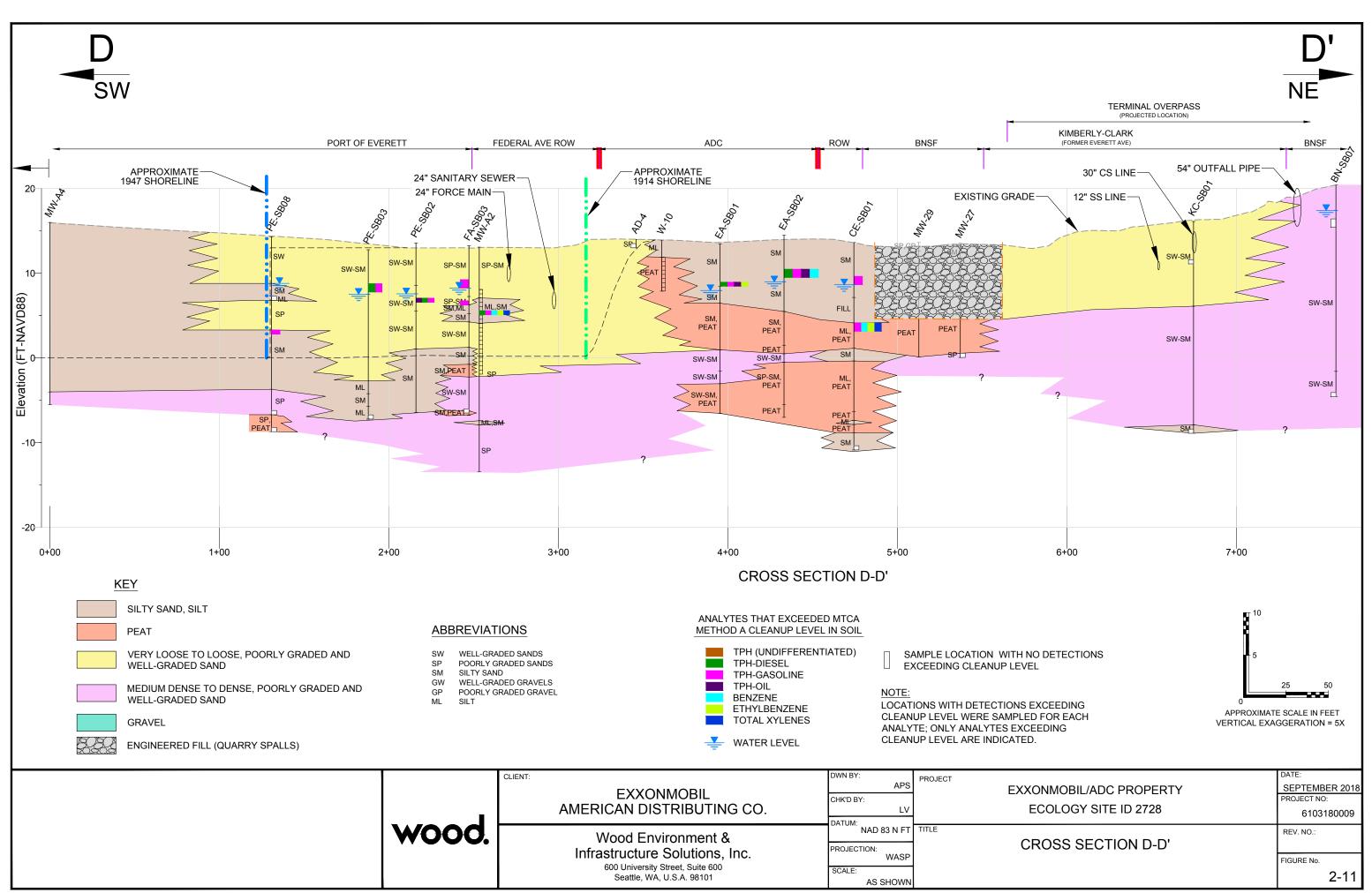


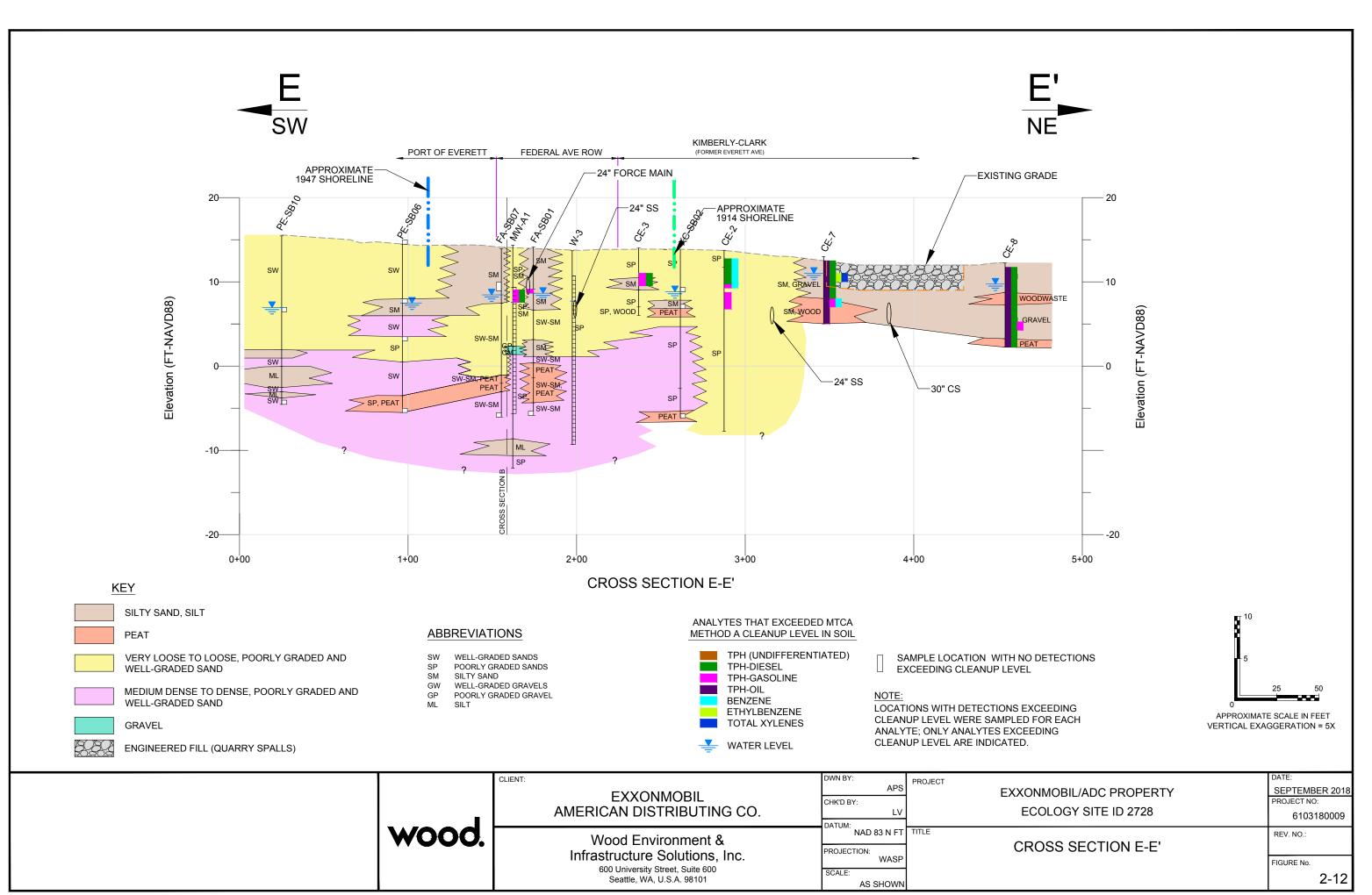


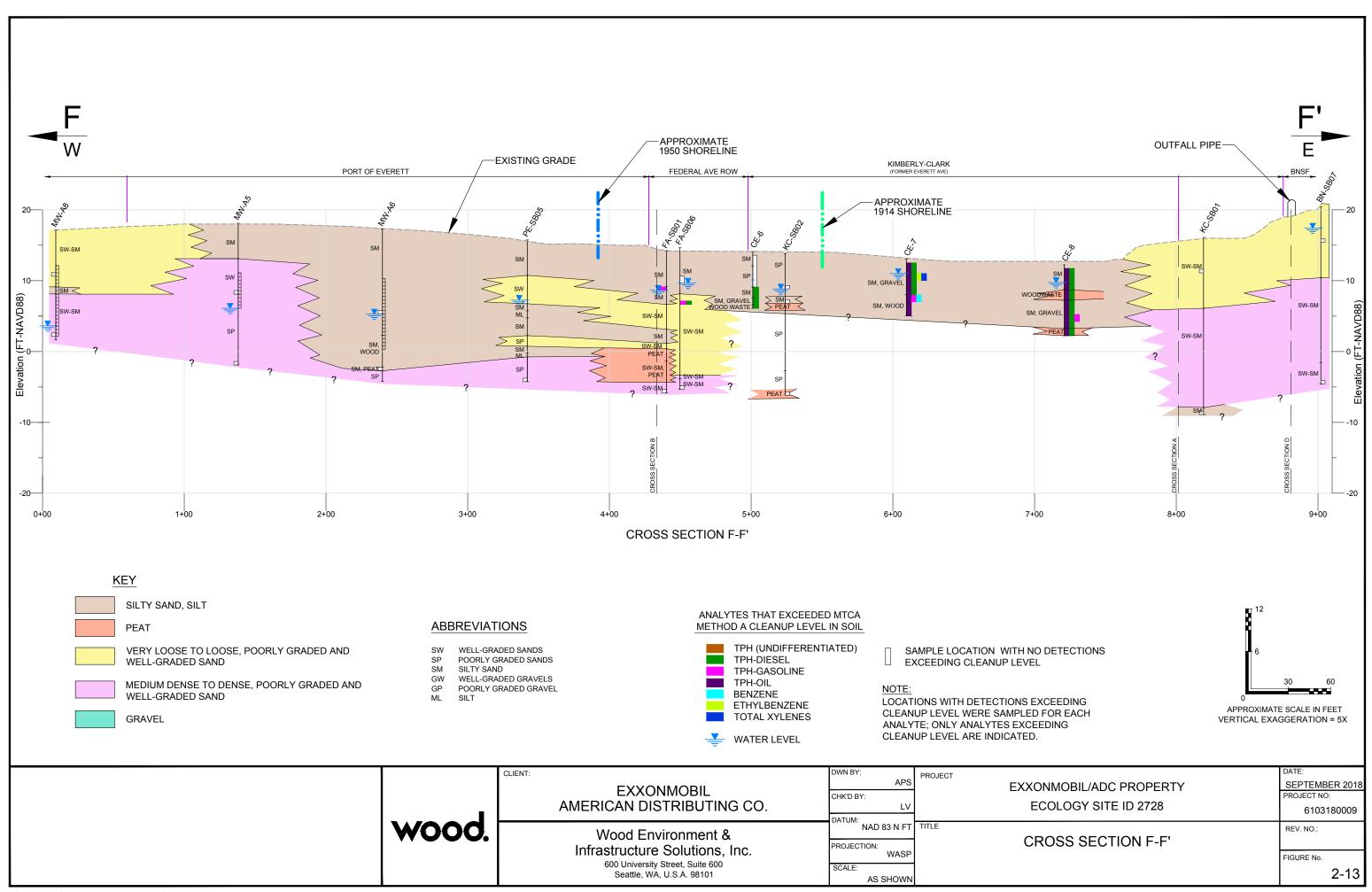


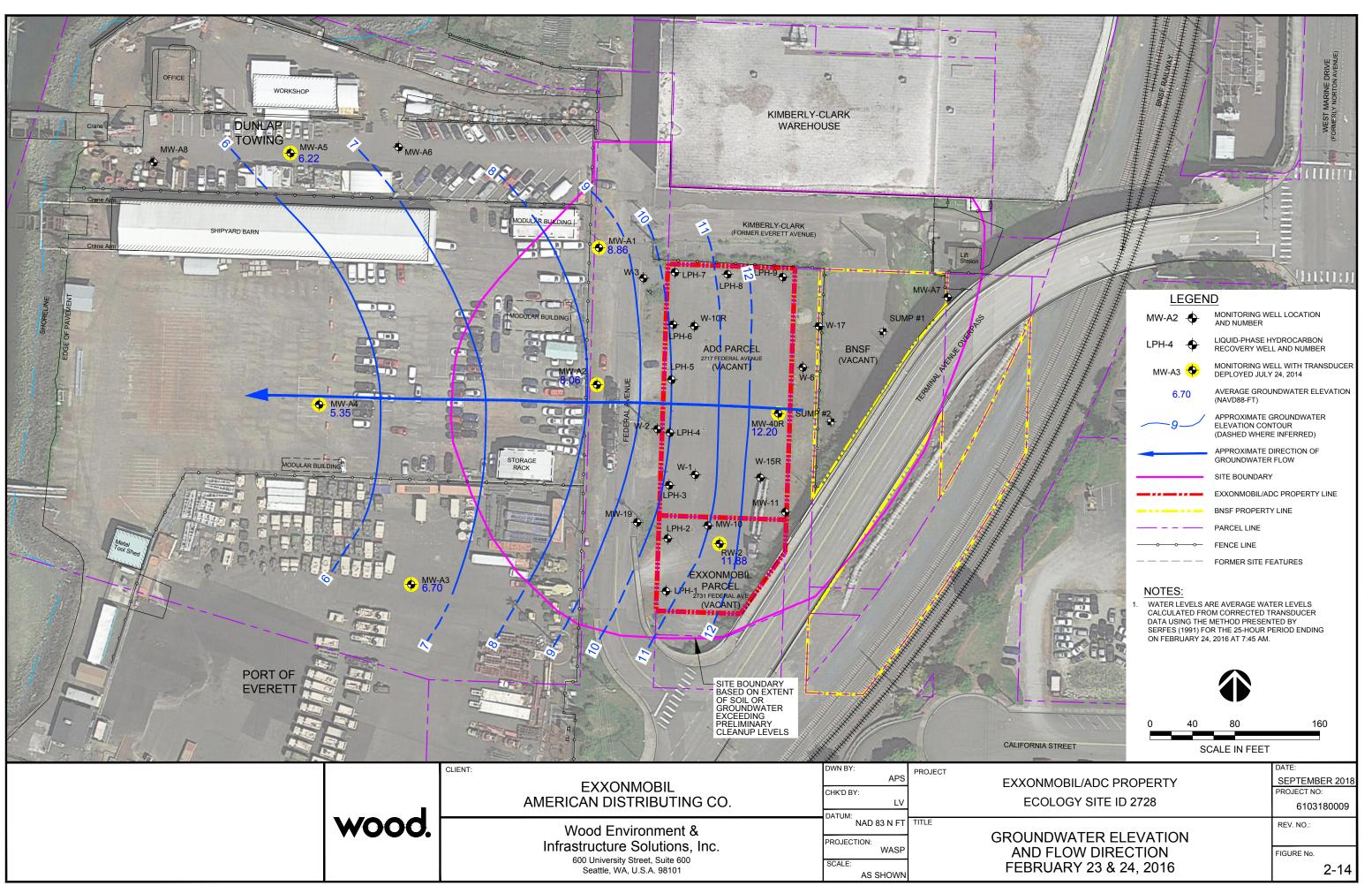


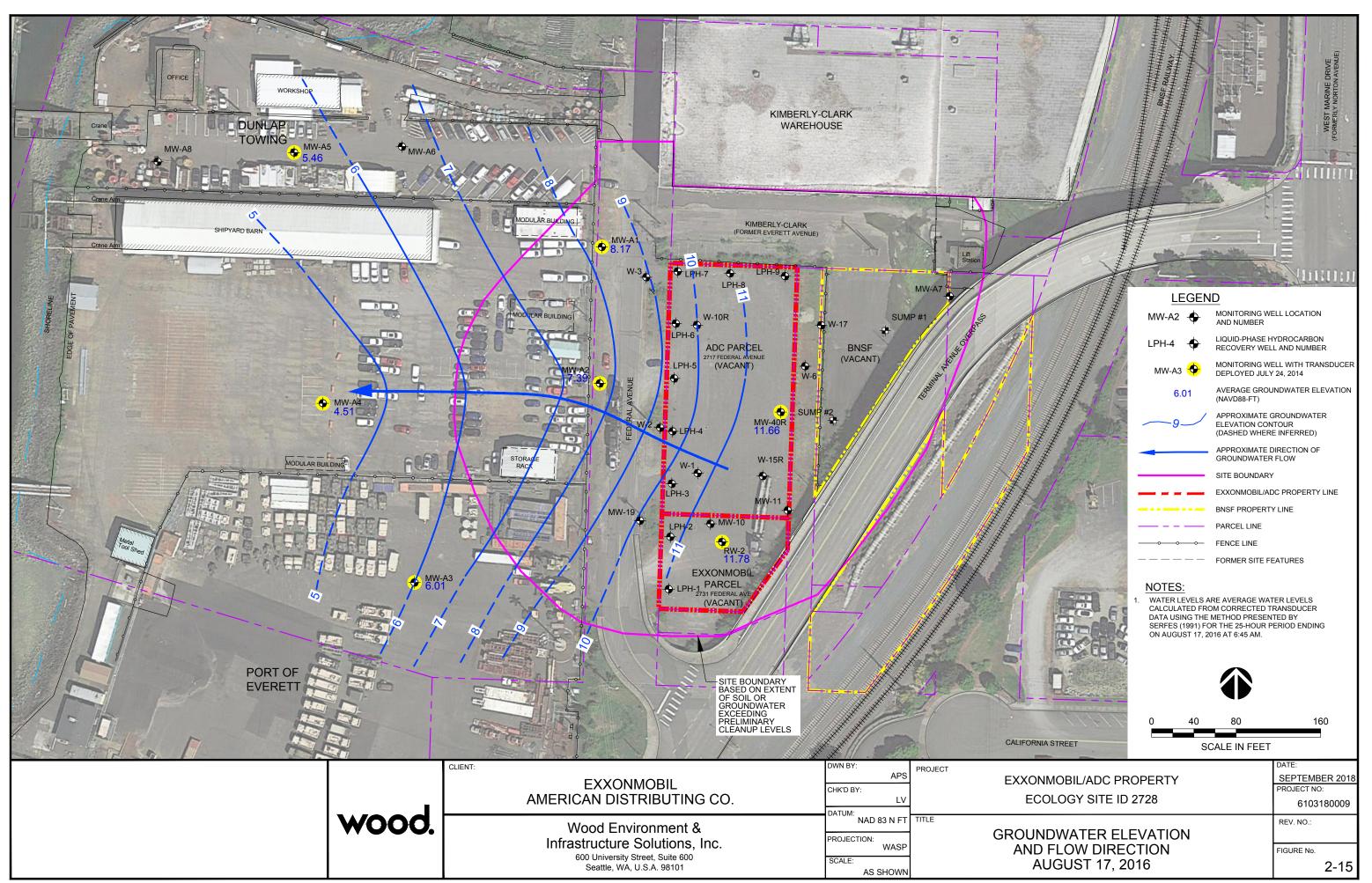


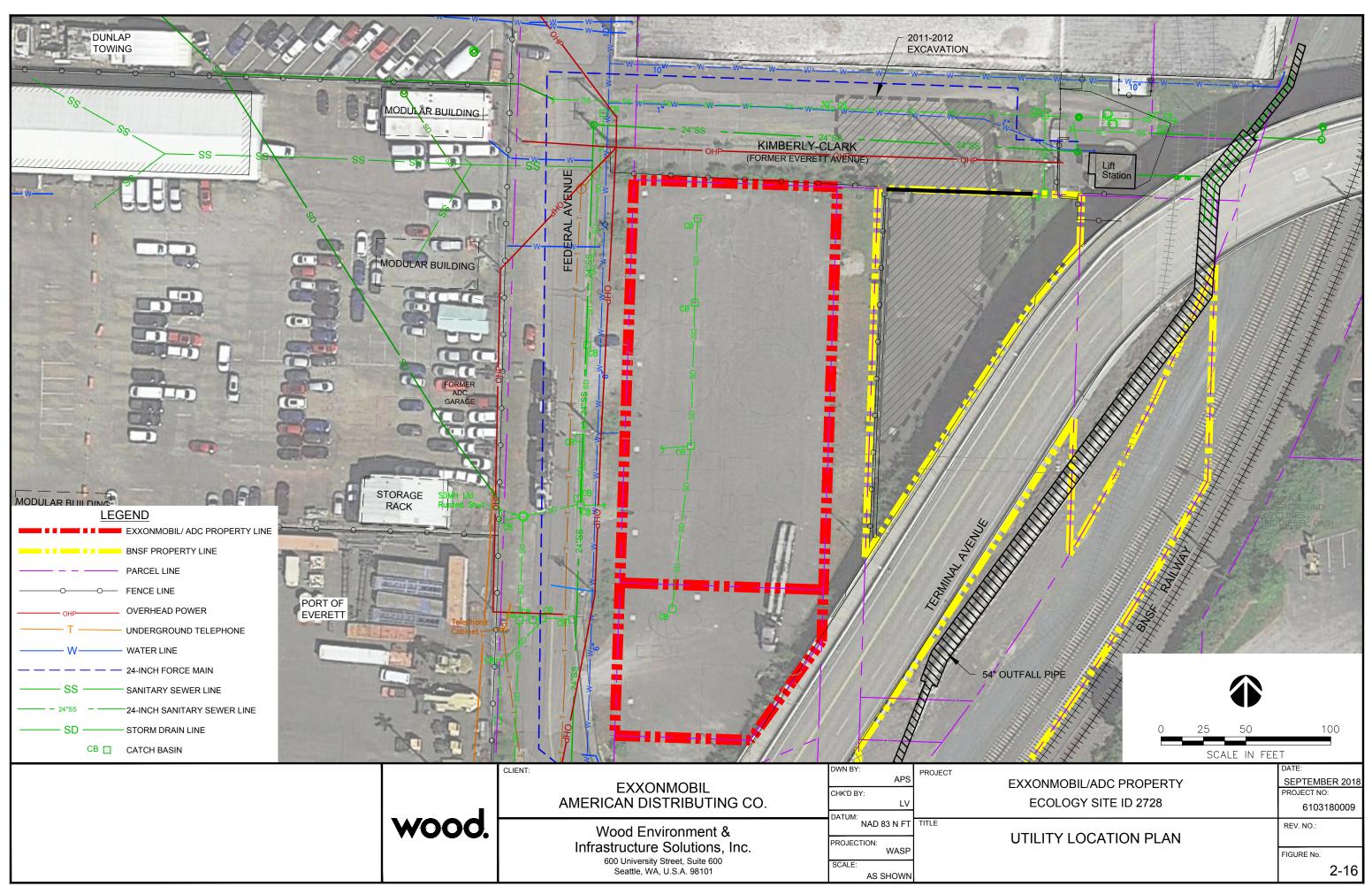


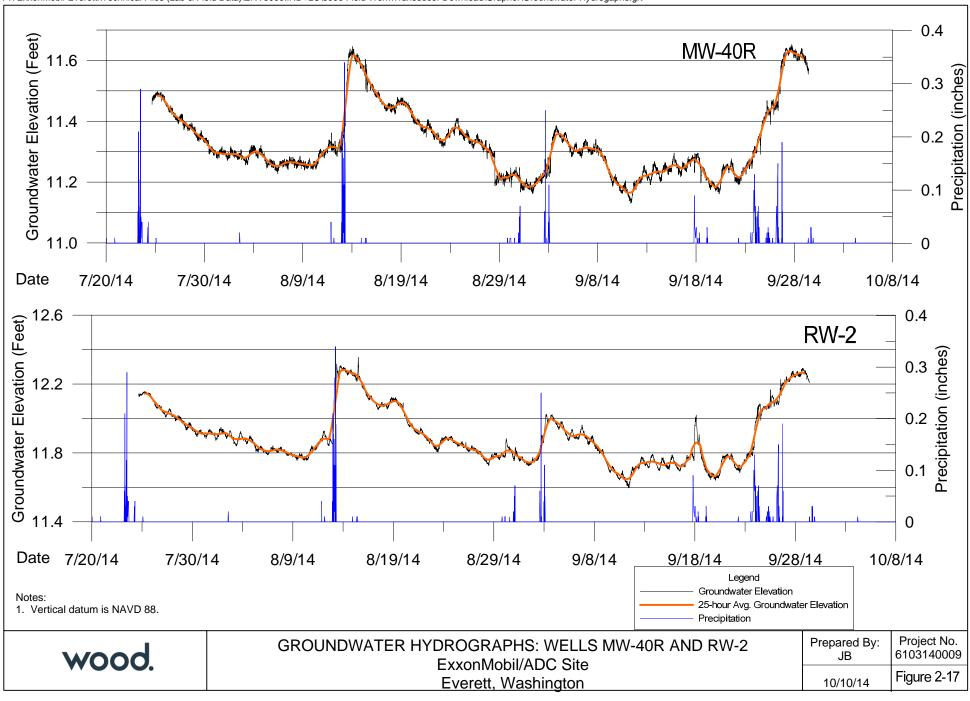


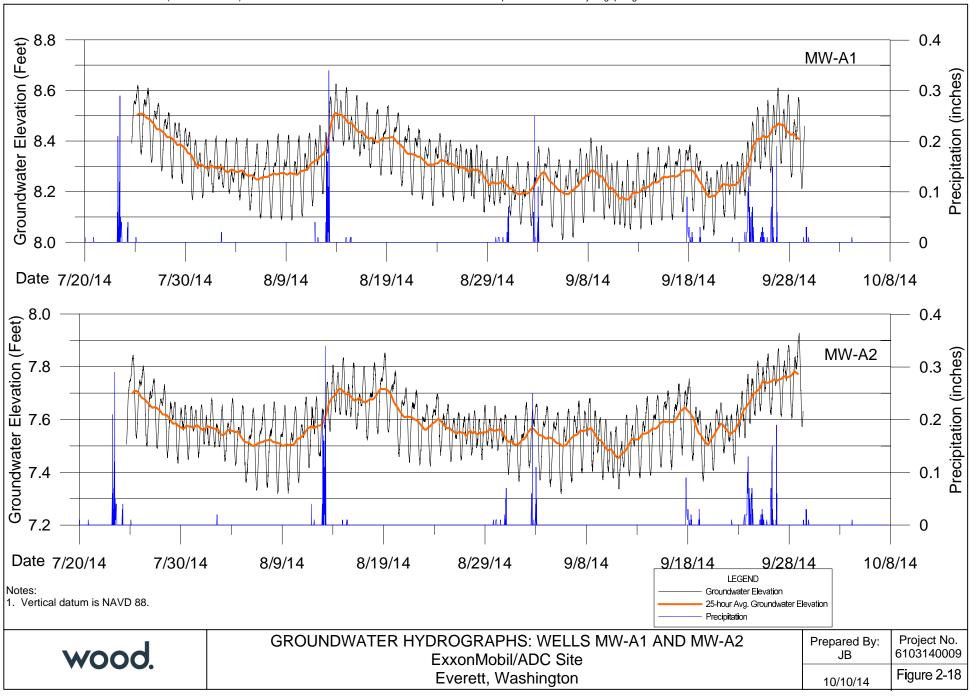


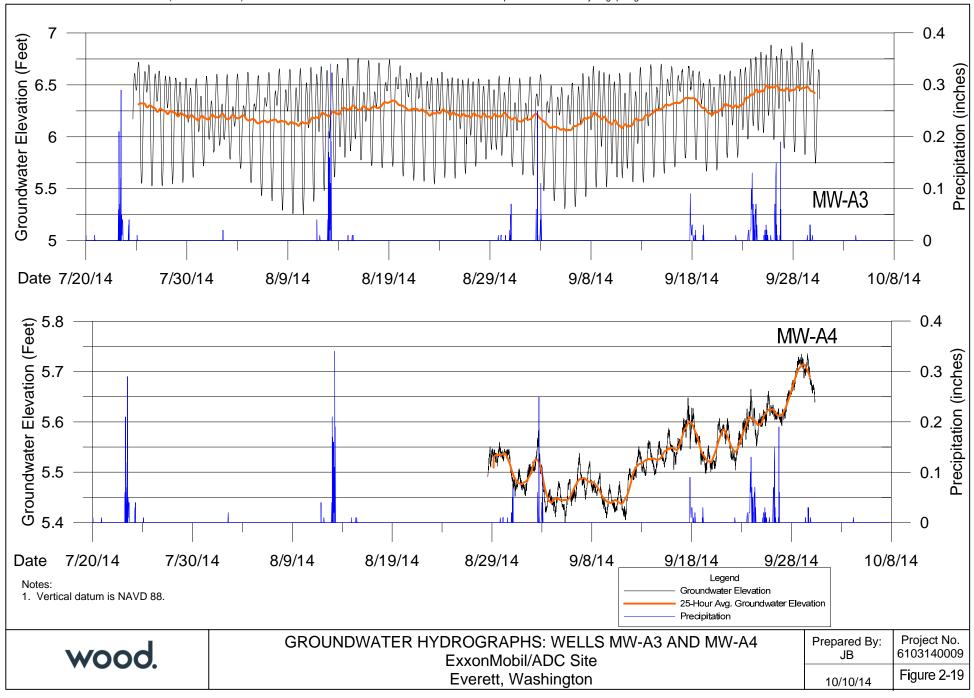


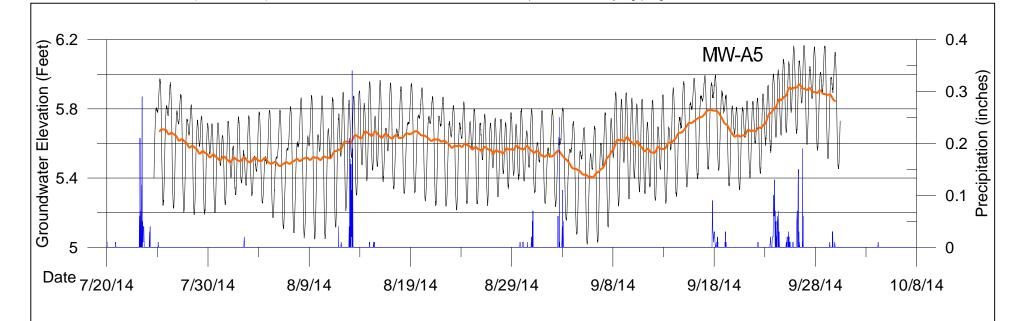








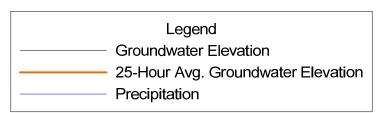




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Notes:

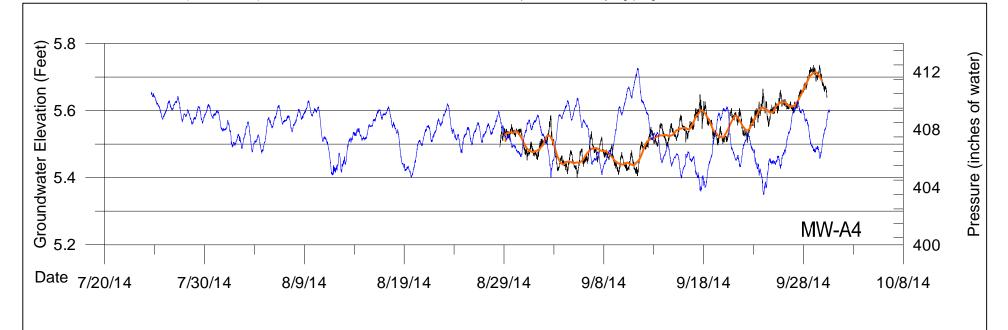
1. Vertical datum is NAVD 88.





GROUNDWATER HYDROGRAPHS: WELL MW-A5
ExxonMobil/ADC Site
Everett, Washington

Prepared By:	Project No.
JB	6103140009
10/10/14	Figure 2-20



Notes:

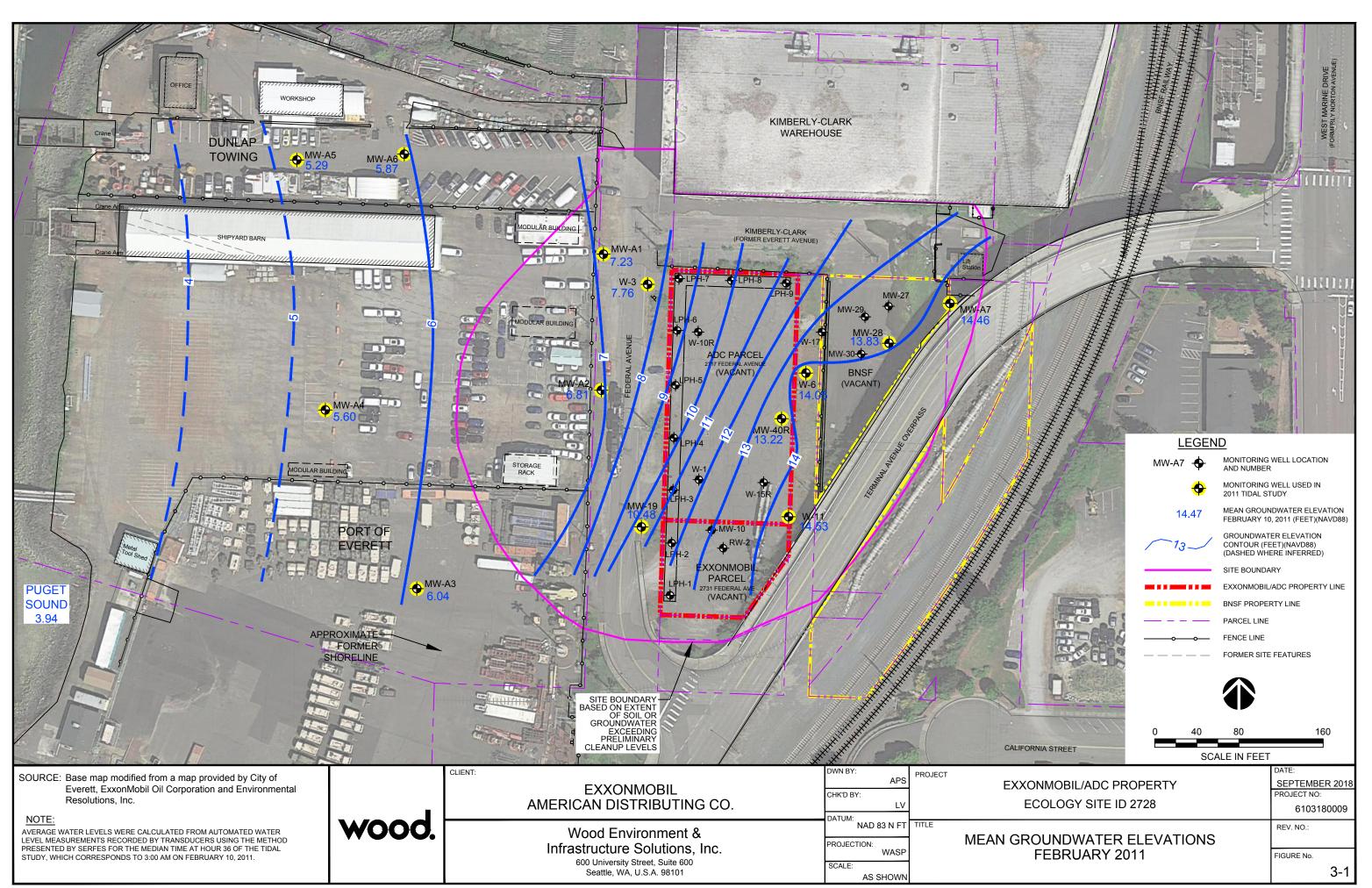
1. Vertical datum is NAVD 88.

Legend
Groundwater Elevation
25-Hour Avg. Groundwater Elevation
Pressure (inches of water)



PLOT OF ATMOSPHERIC PRESSURE AND GROUNDWATER HYDROGRAPH FOR MW-A4 ExxonMobil/ADC Everett, Washington

Prepared By:	Project No.
JB	6103140009
10/10/14	Figure 2-21









wood.

CLIENT:

EXXONMOBIL AMERICAN DISTRIBUTING CO.

Wood Environment & Infrastructure Solutions, Inc. 600 University Street, Suite 600 Seattle, WA, U.S.A. 98101

DWN BY:

APS

CHK'D BY:

LV/AS/MS

DATUM:

NAD 83 N FT

TITLE

PROJECTION:

WASP

SCALE:

AS SHOWN

EXXONMOBIL/ADC PROPERTY

ECOLOGY SITE ID 2728

PHOTOGRAPHS OF EXAMPLE SEEPS OBSERVED ON FEDERAL AVENUE APRIL 28, 2011 DATE:

SEPTEMBER 2018

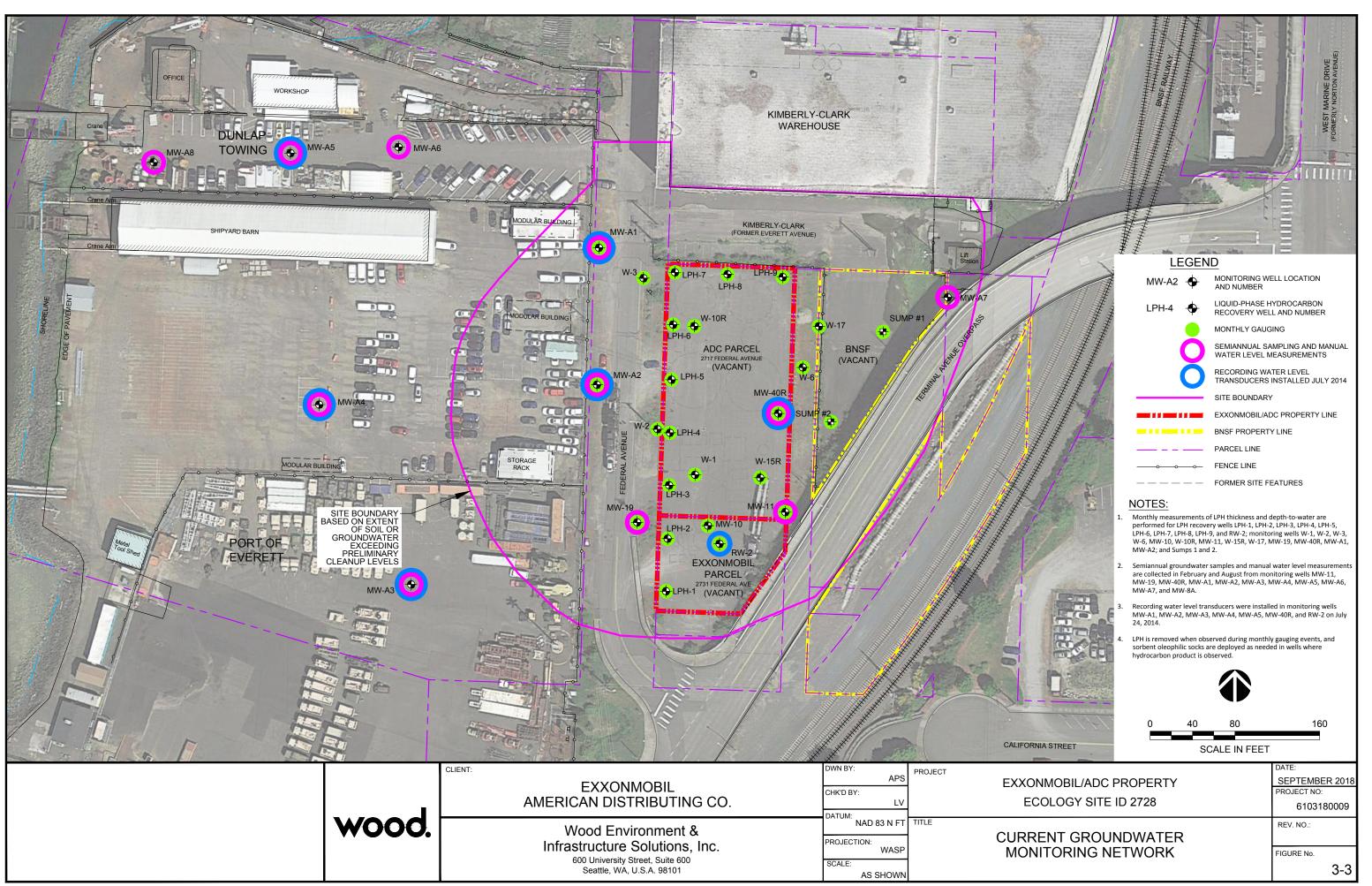
PROJECT NO:

6103180009

REV. NO.:

FIGURE No.

3-2



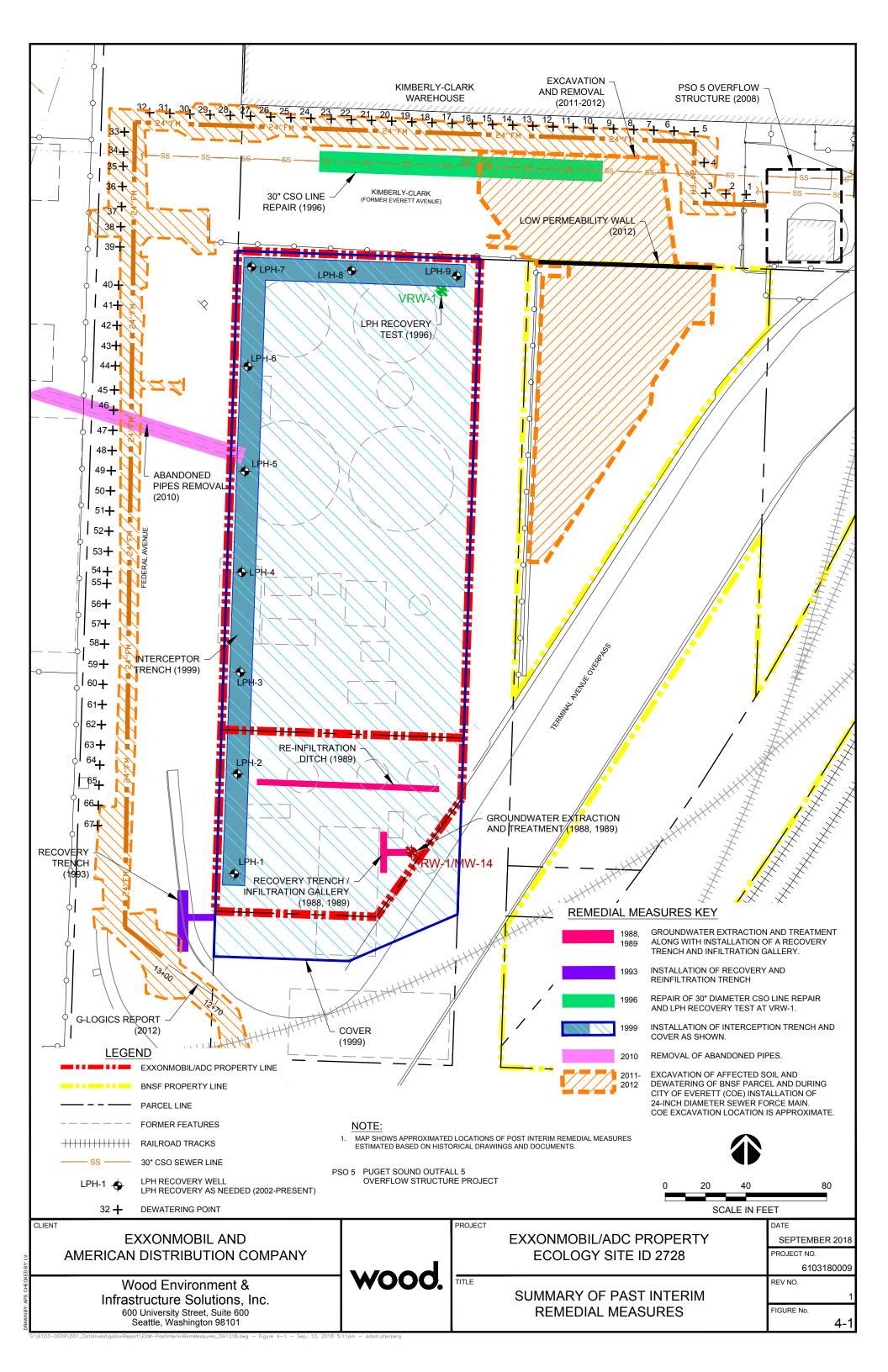


FIGURE 4-2

PHOTOGRAPHS OF 2011-2012 EXCAVATION ON BNSF PROPERTY

ExxonMobil/ADC Property, Ecology Site ID 2728 Everett, Washington





FIGURE 4-3

PHOTOGRAPHS OF SOIL AND DEBRIS FROM 2011-2012 EXCAVATION DECEMBER, 2011

ExxonMobil/ADC Property, Ecology Site ID 2728 Everett, Washington





FIGURE 4-4

PHOTOGRAPHS OF BARRIER WALL CONSTRUCTION ALONG BNSF PROPERTY BOUNDARY FEBRUARY, 2012

ExxonMobil/ADC Property, Ecology Site ID 2728 Everett, Washington

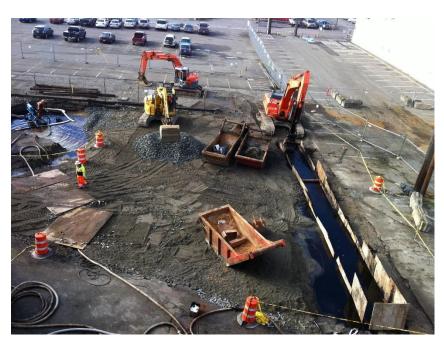




FIGURE 4-5

PHOTOGRAPHS KC PROPERTY EXCAVATION MARCH, 2012

ExxonMobil/ADC Property, Ecology Site ID 2728 Everett, Washington

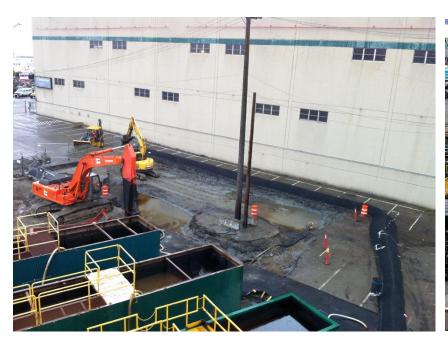




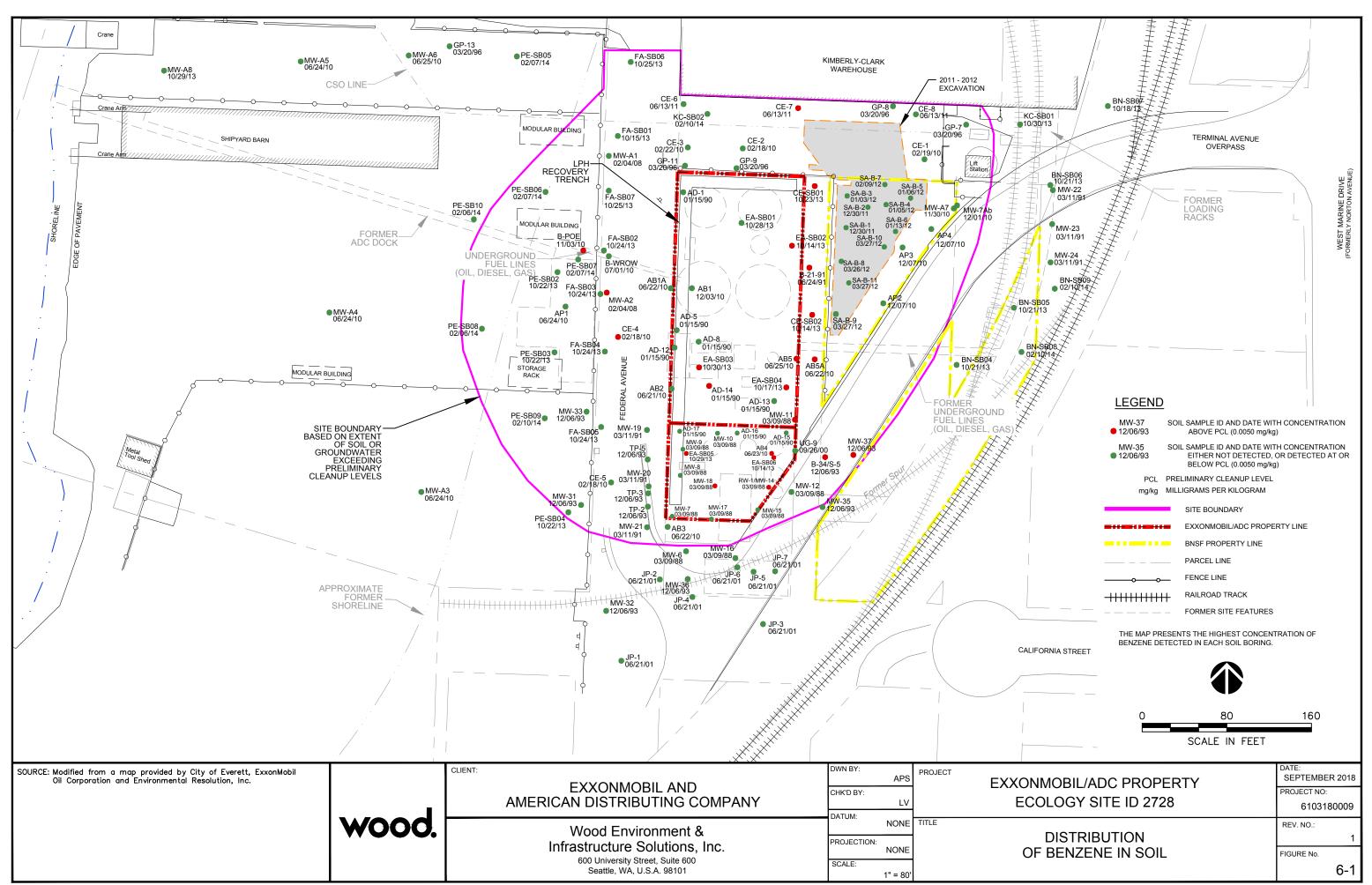
FIGURE 4-6

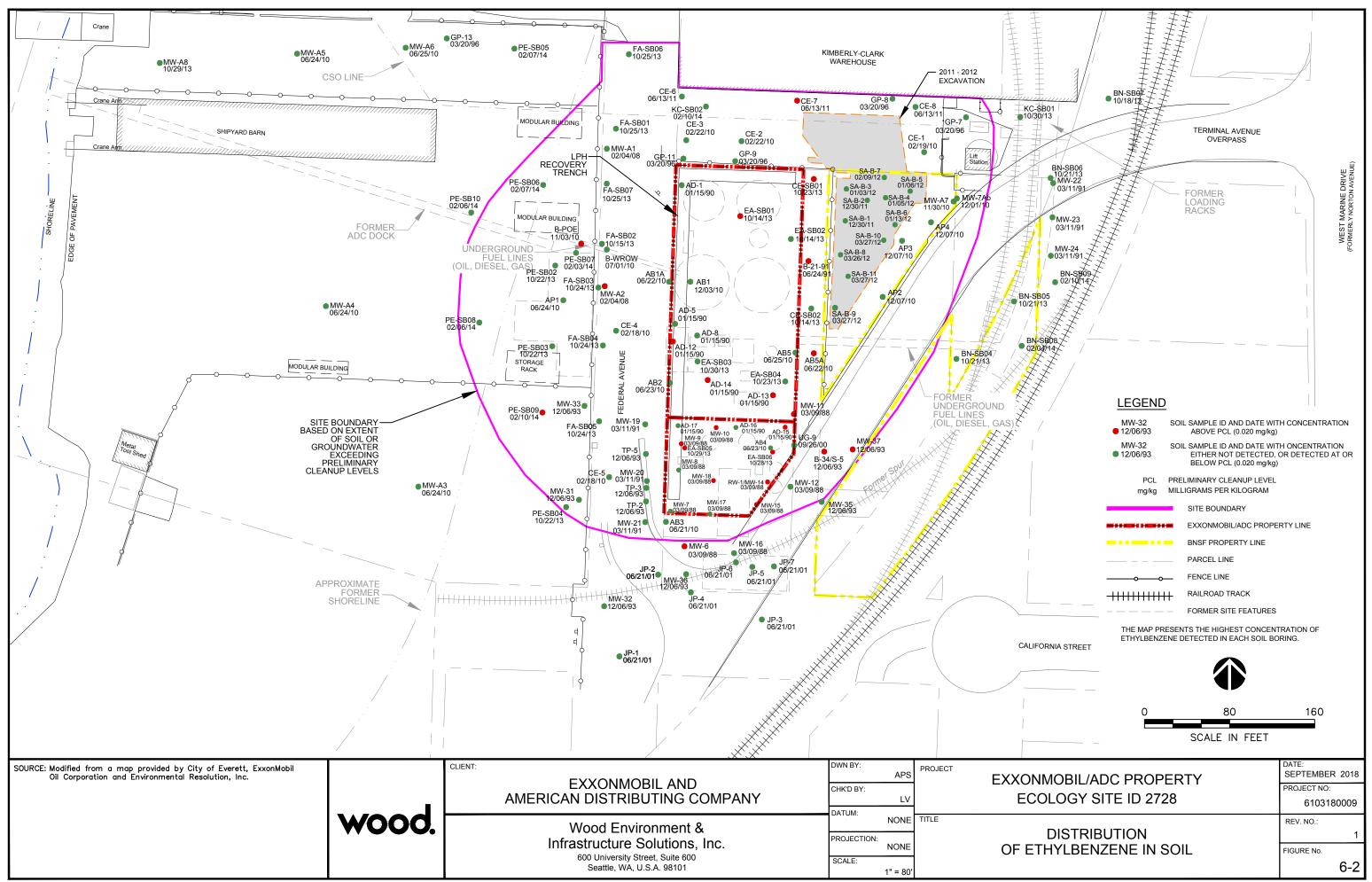
PHOTOGRAPHS OF BACKFILLING THE BNSF EXCAVATION JANUARY, 2012

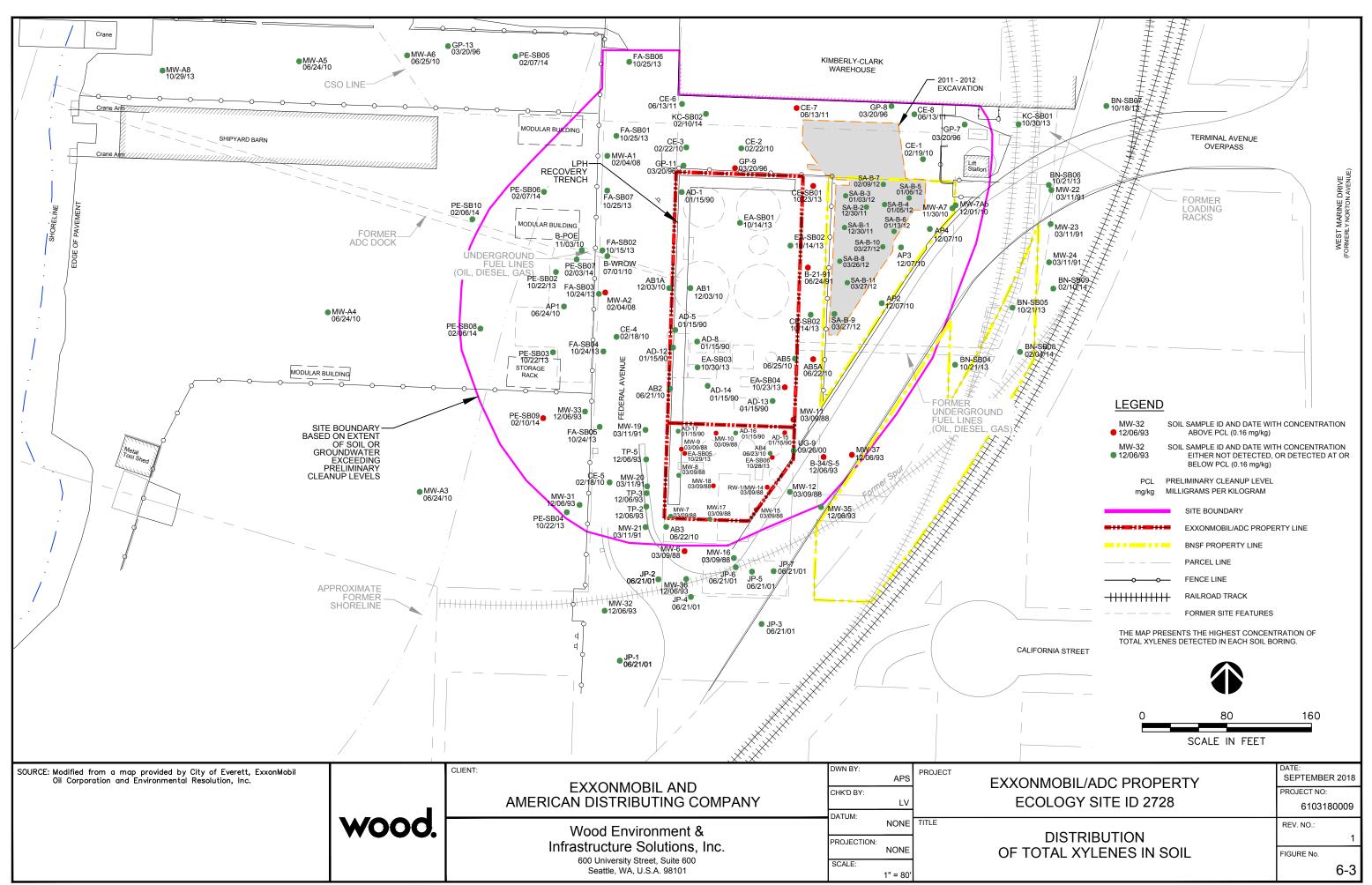
ExxonMobil/ADC Property, Ecology Site ID 2728 Everett, Washington

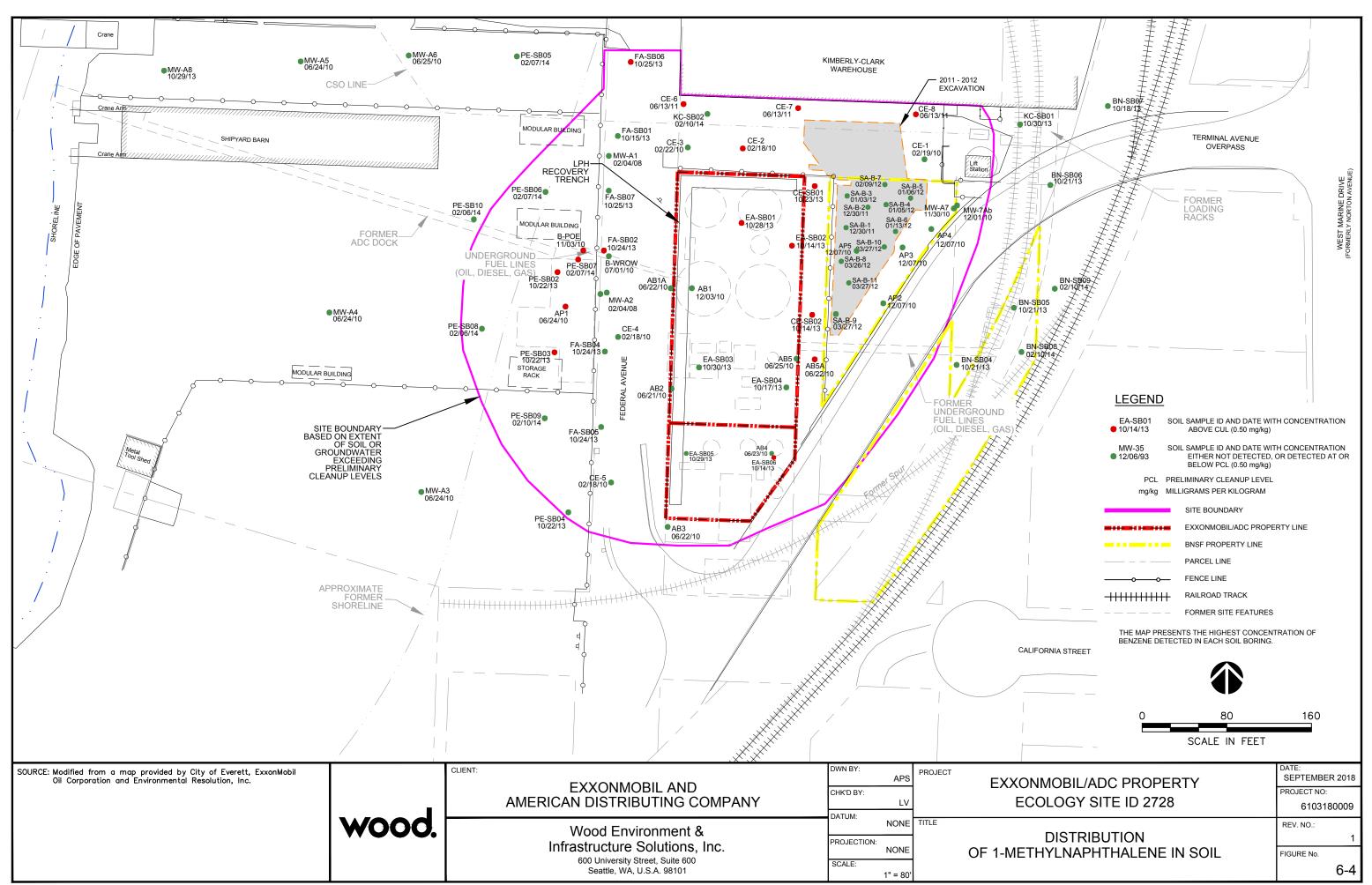


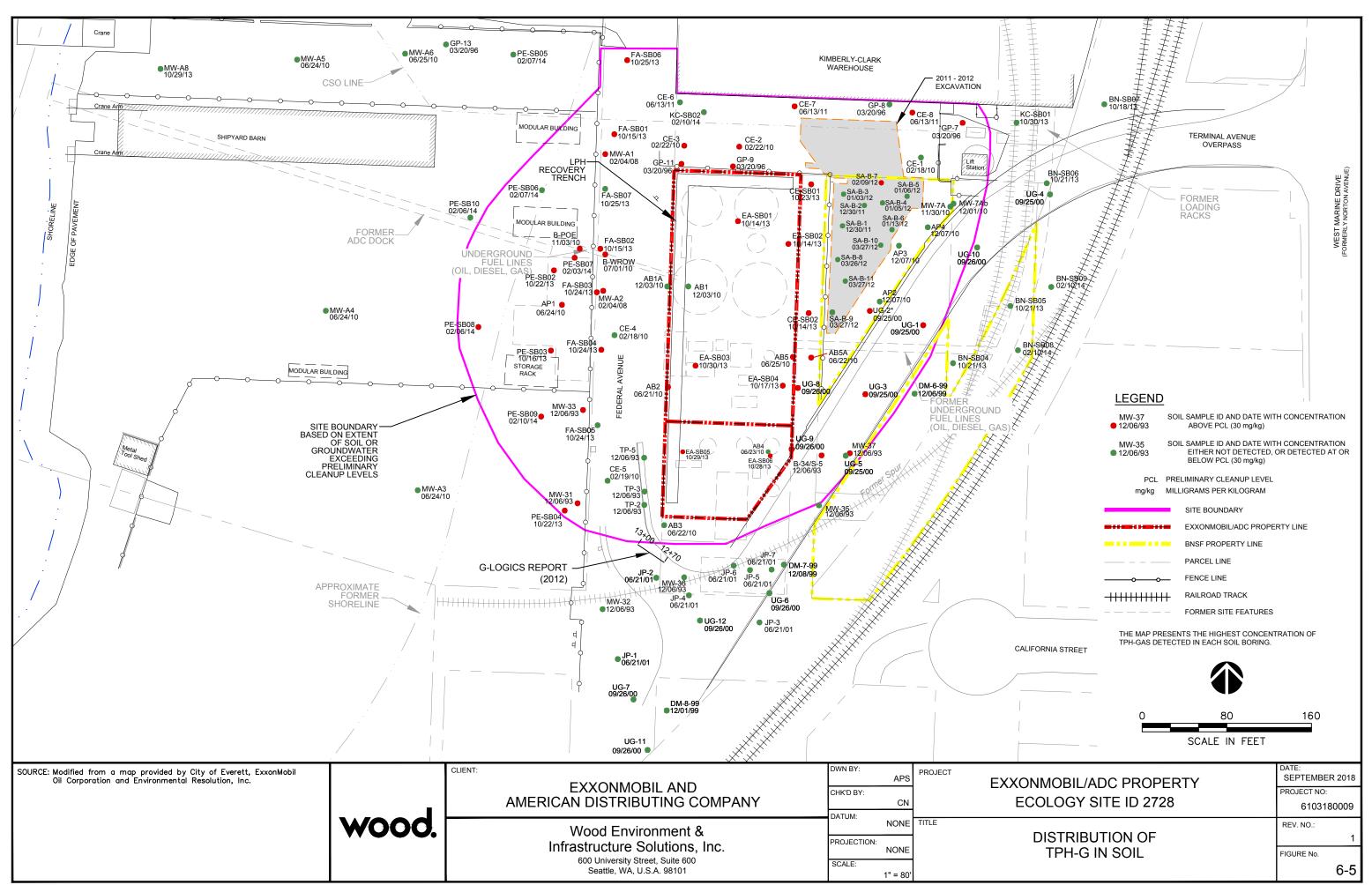


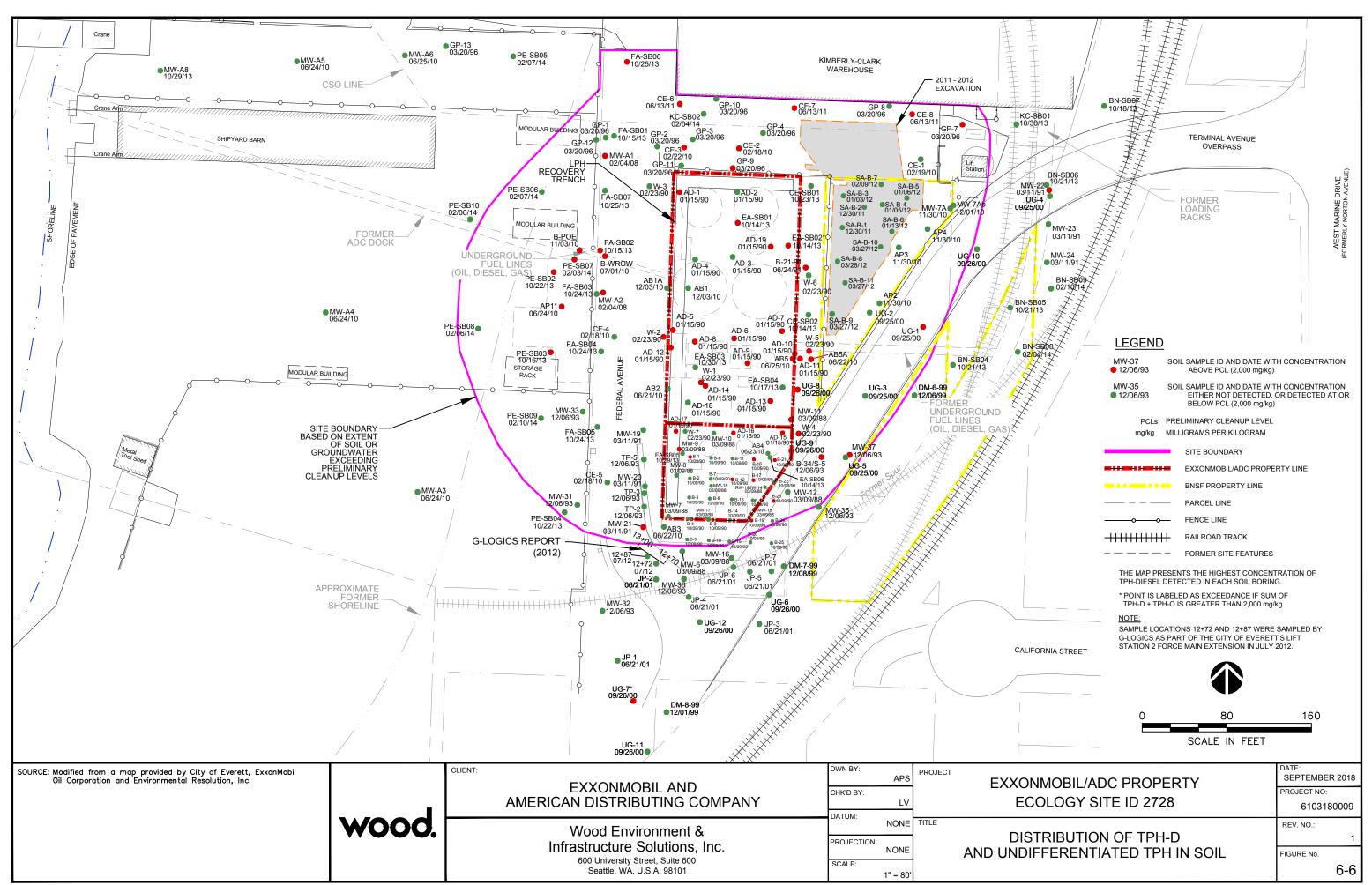


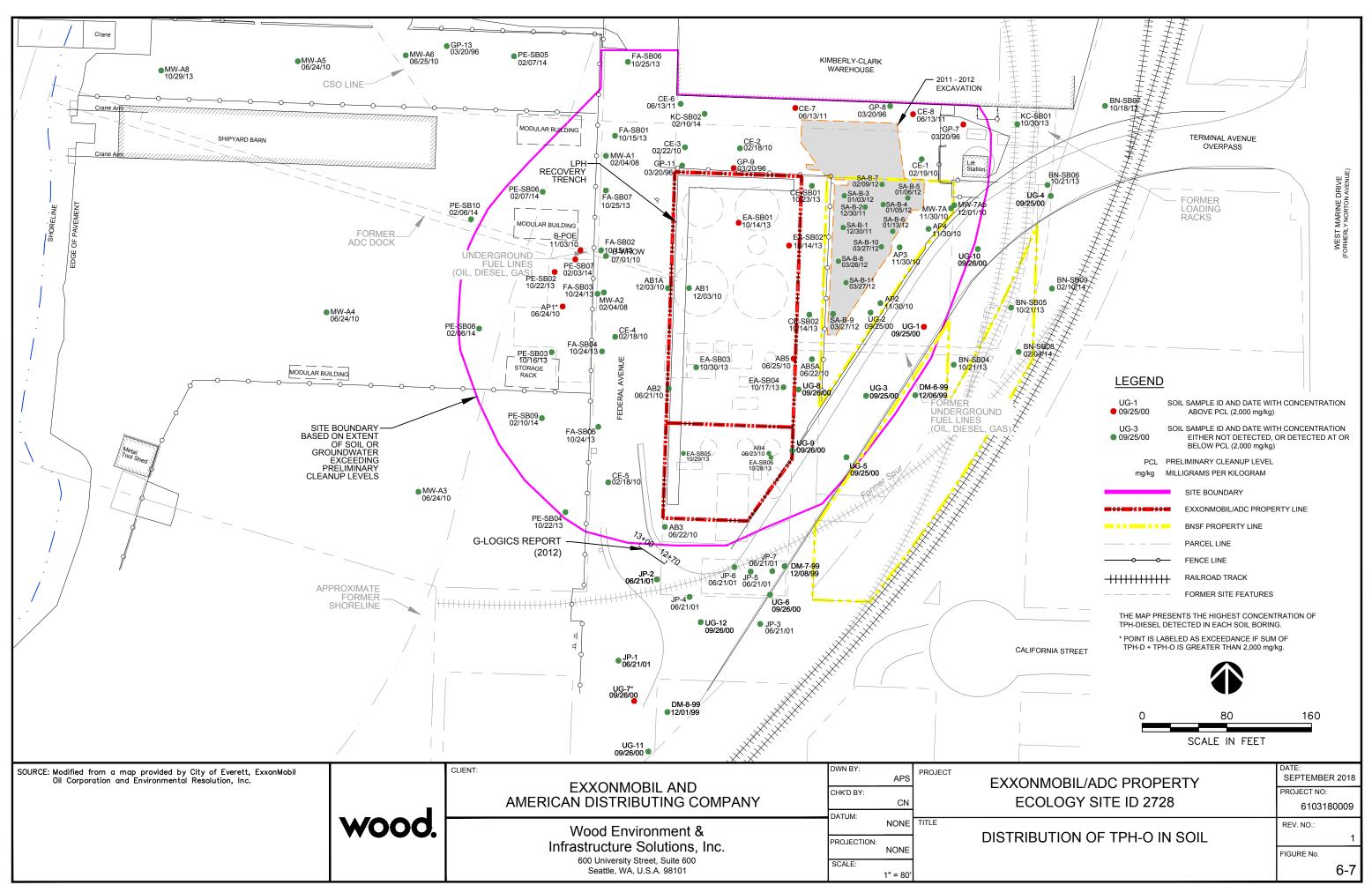


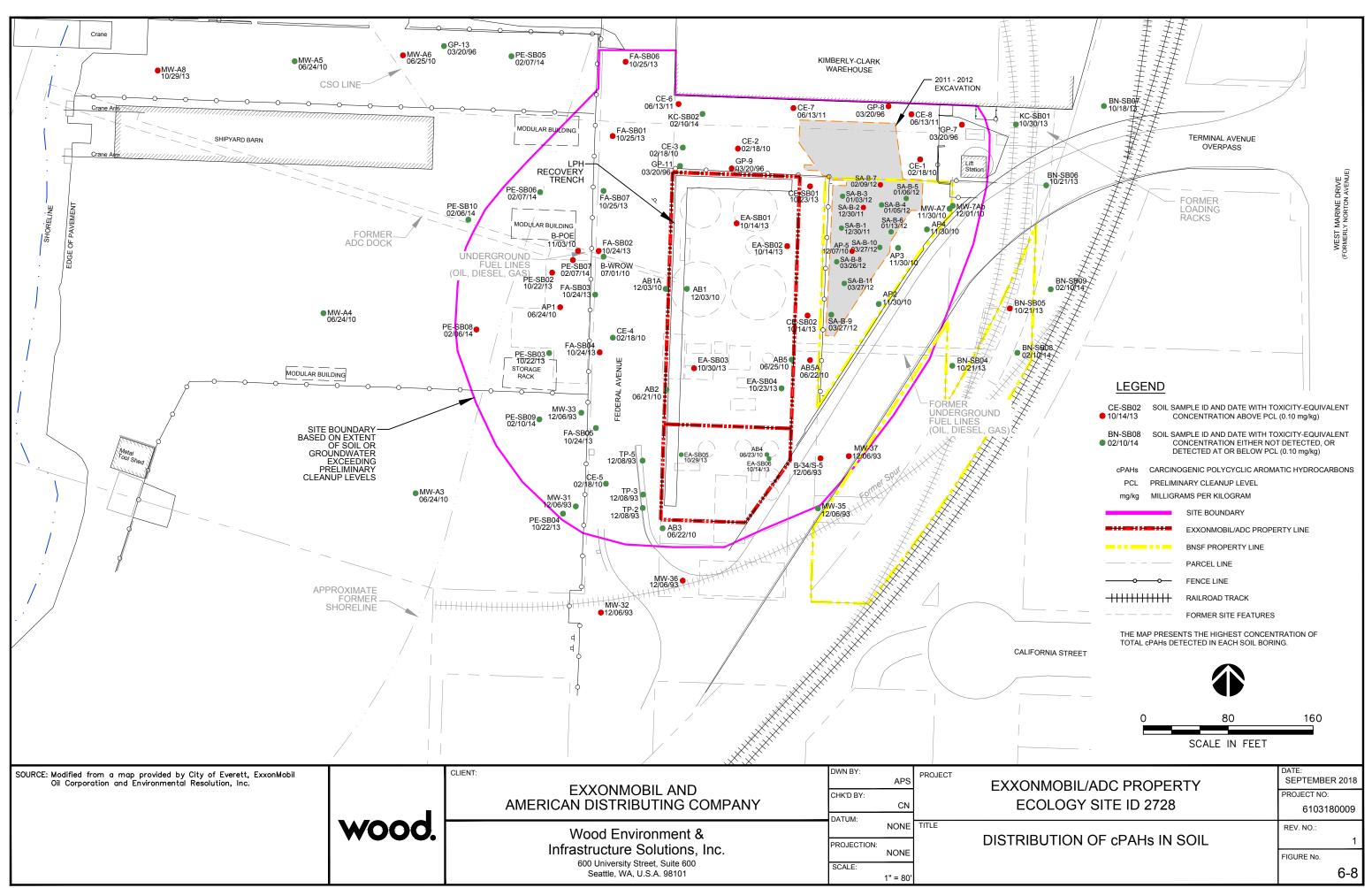


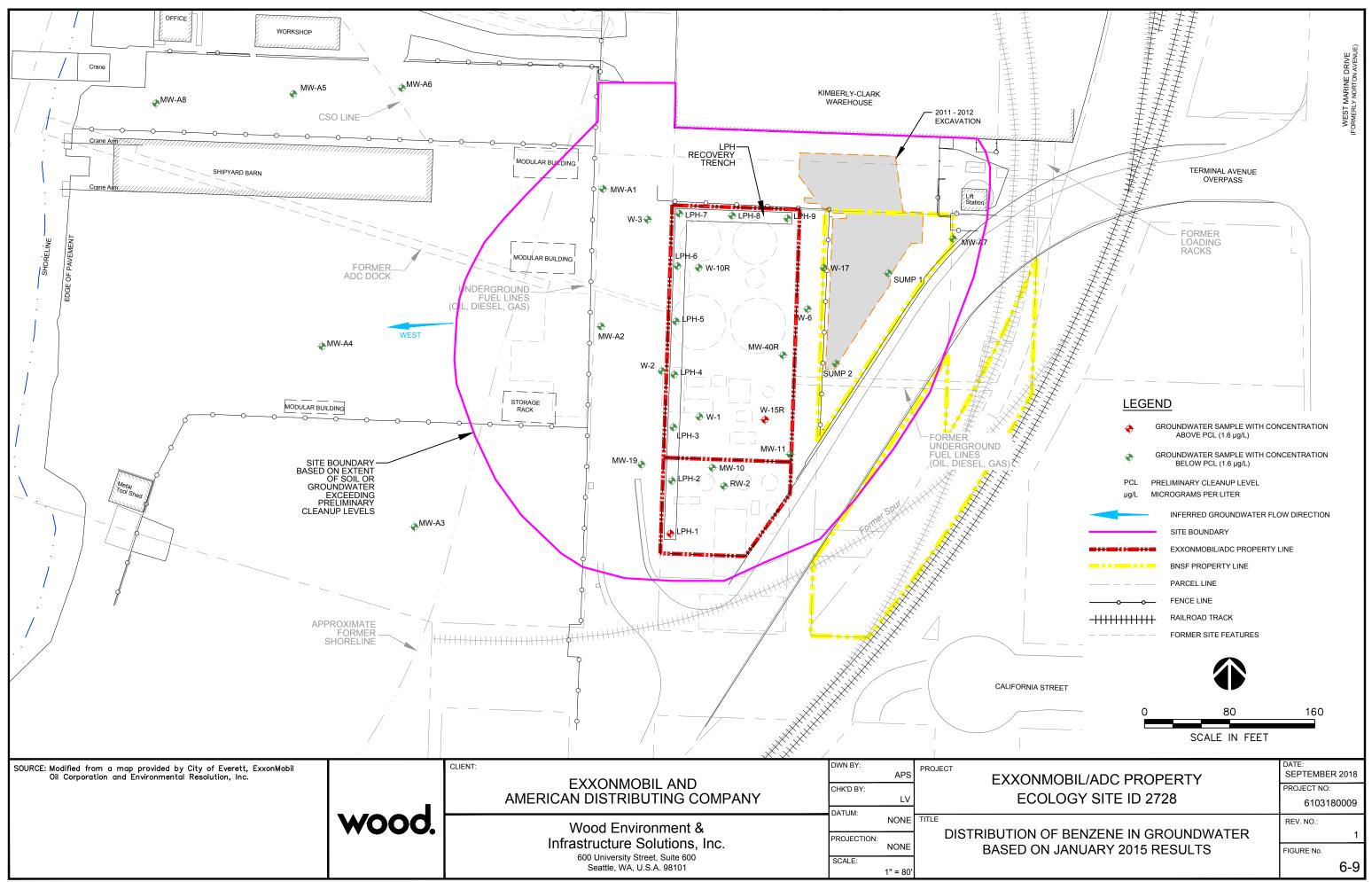


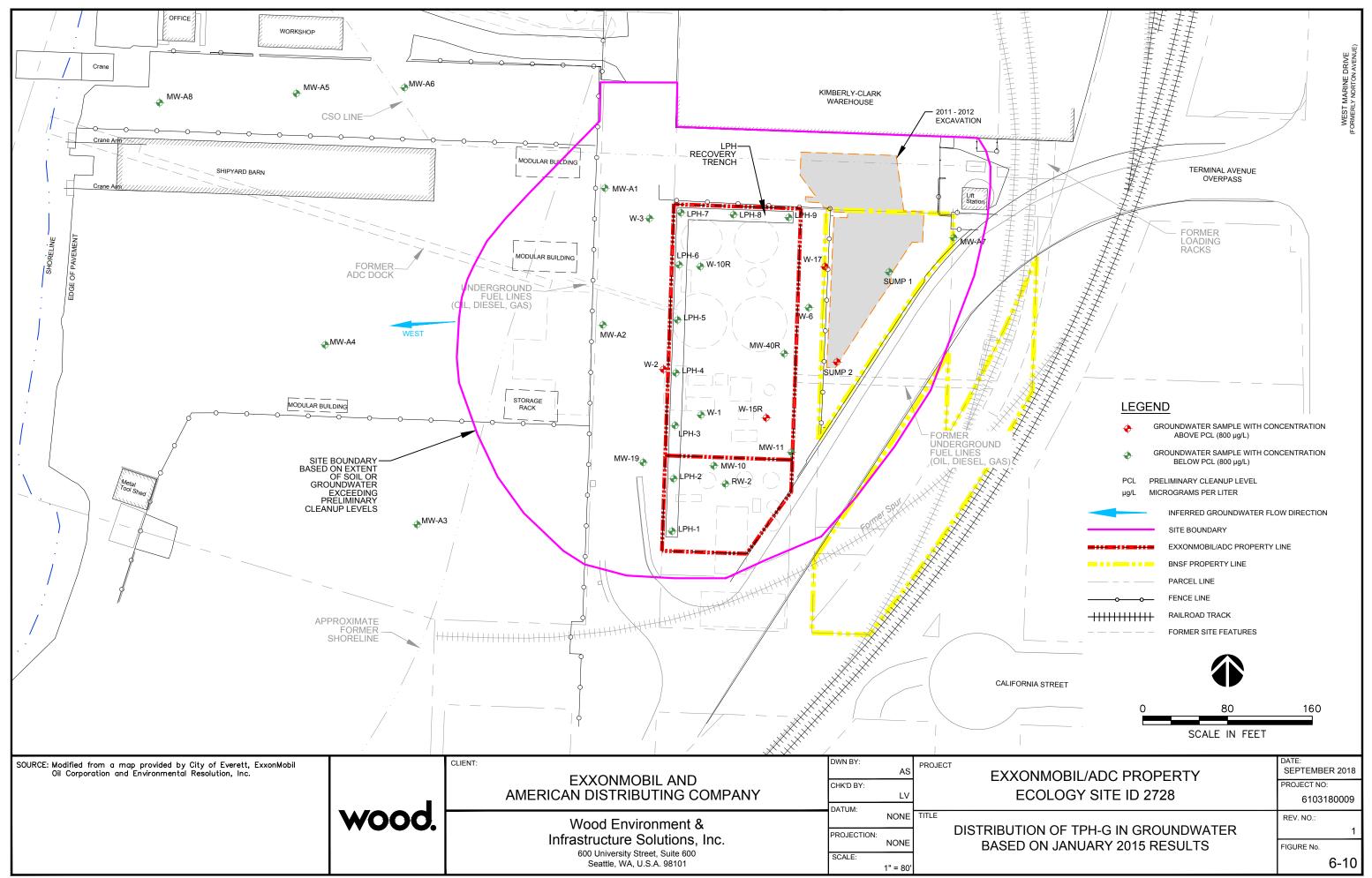


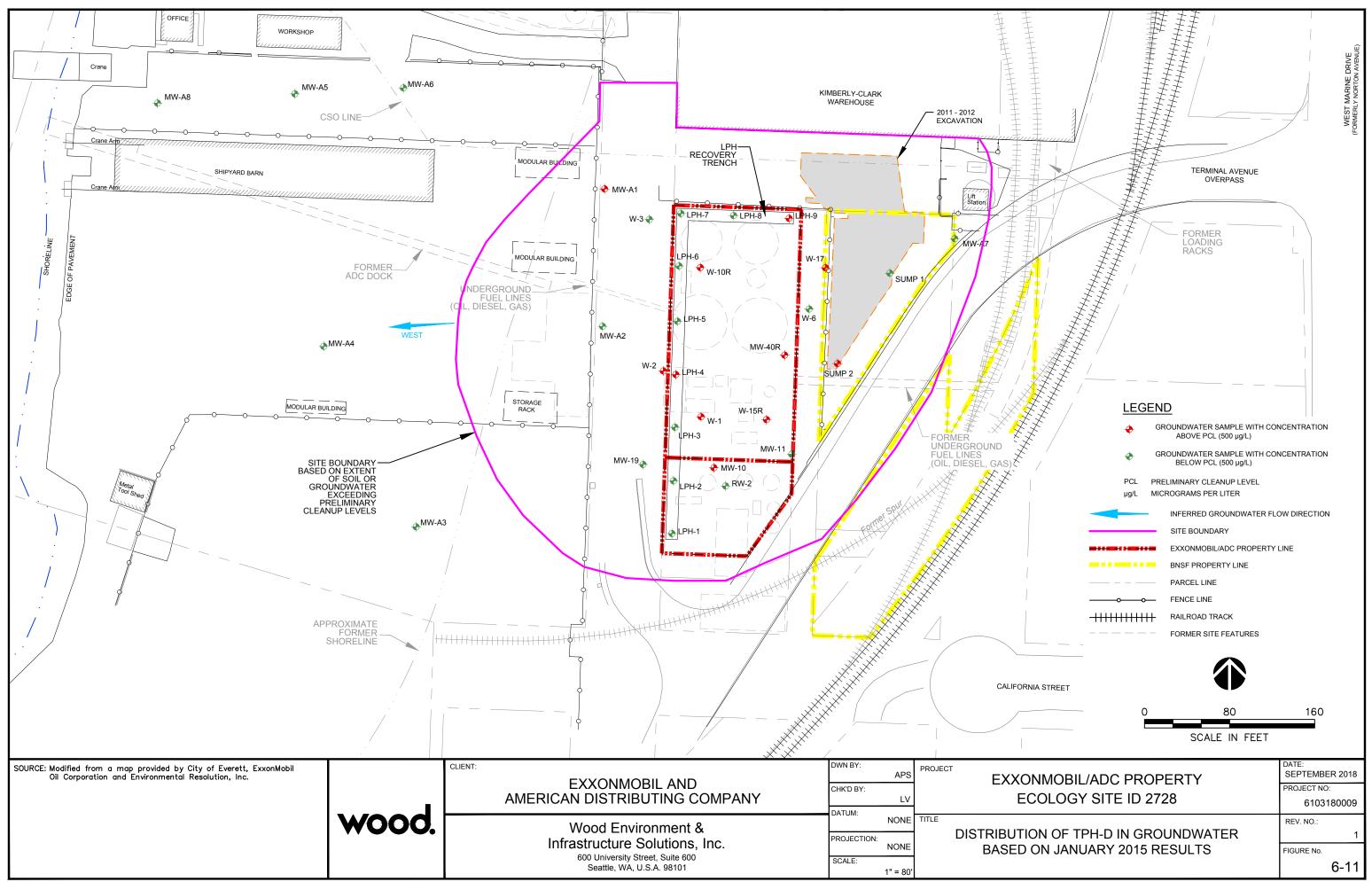


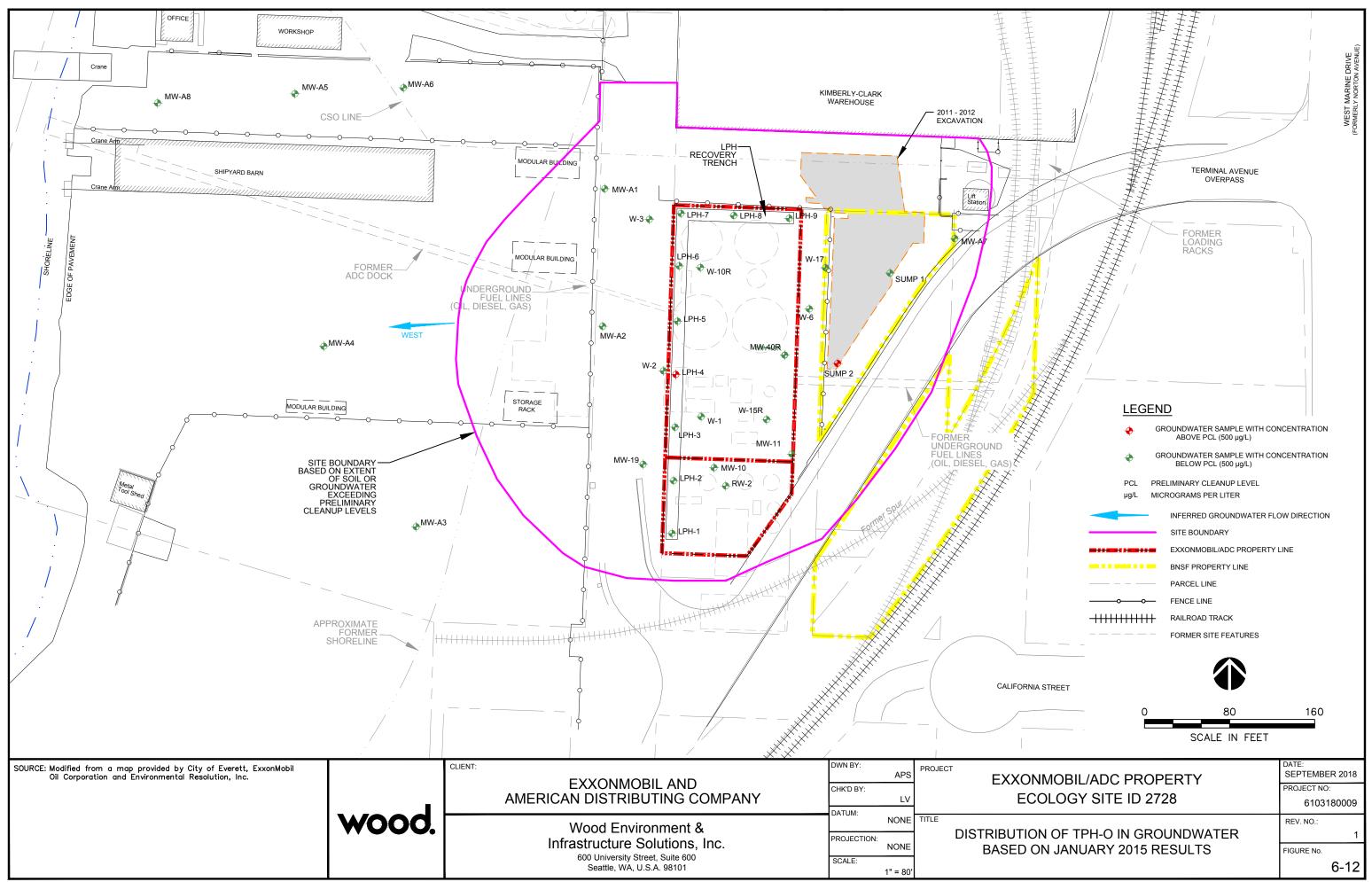


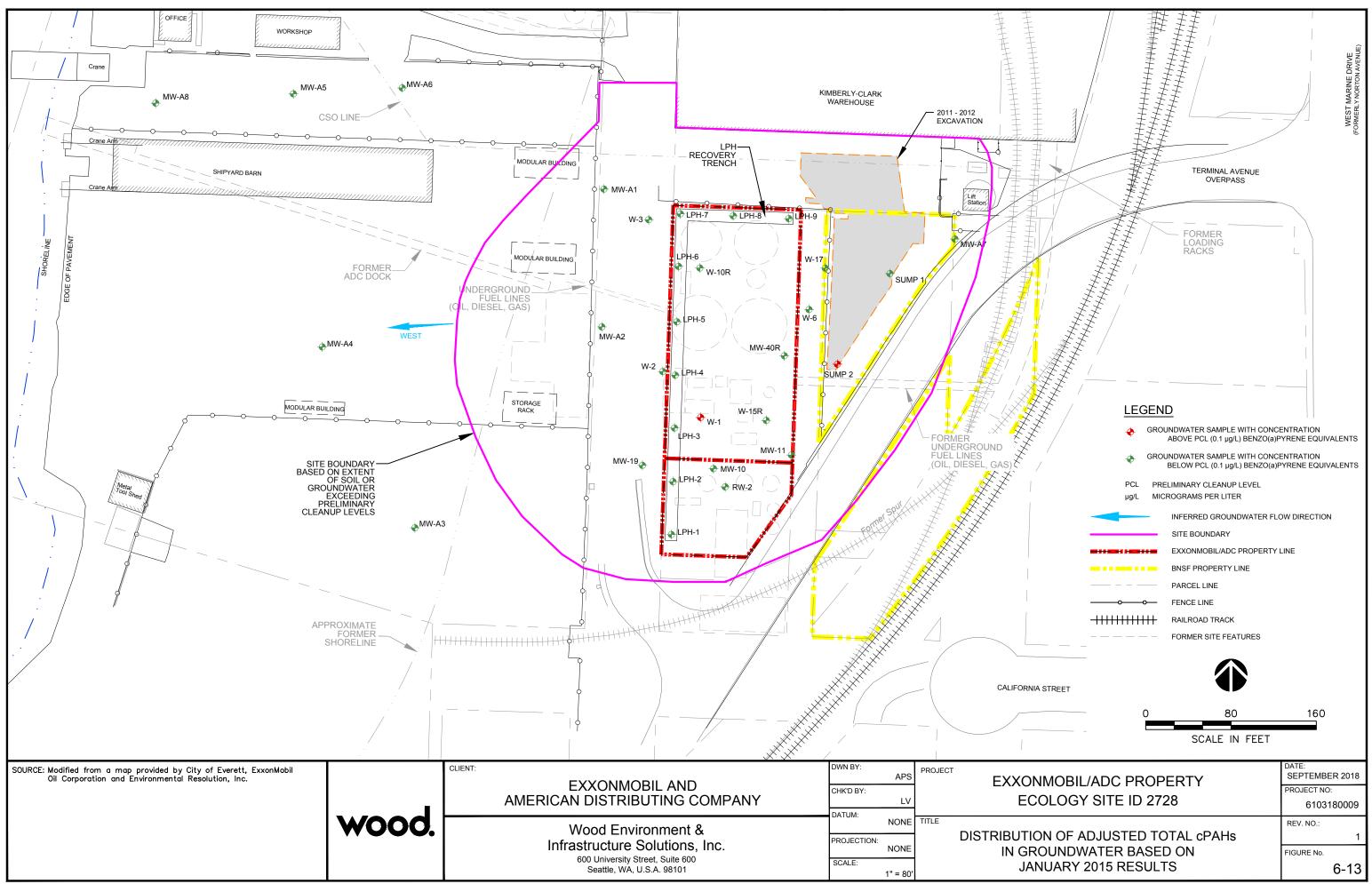


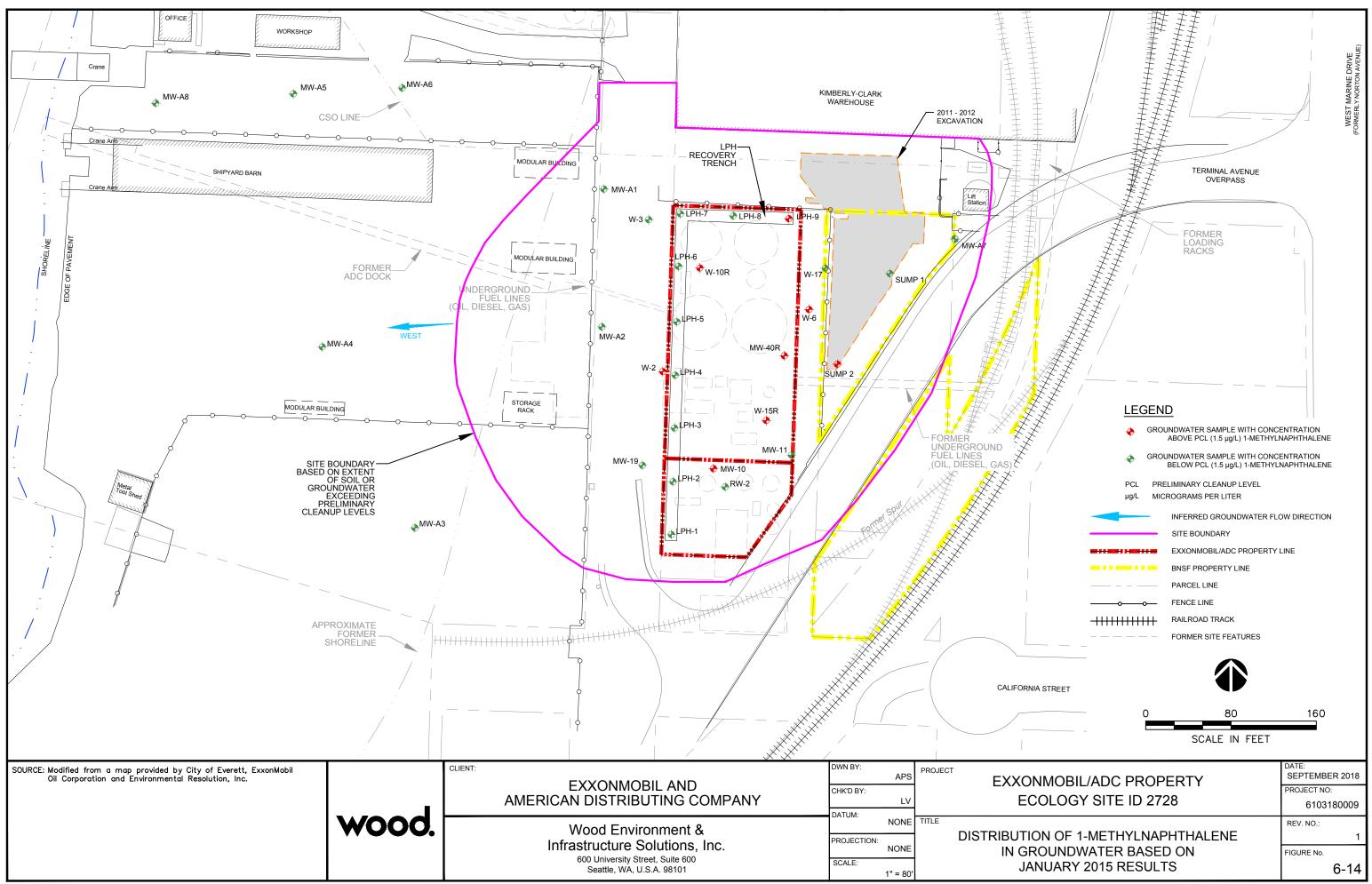


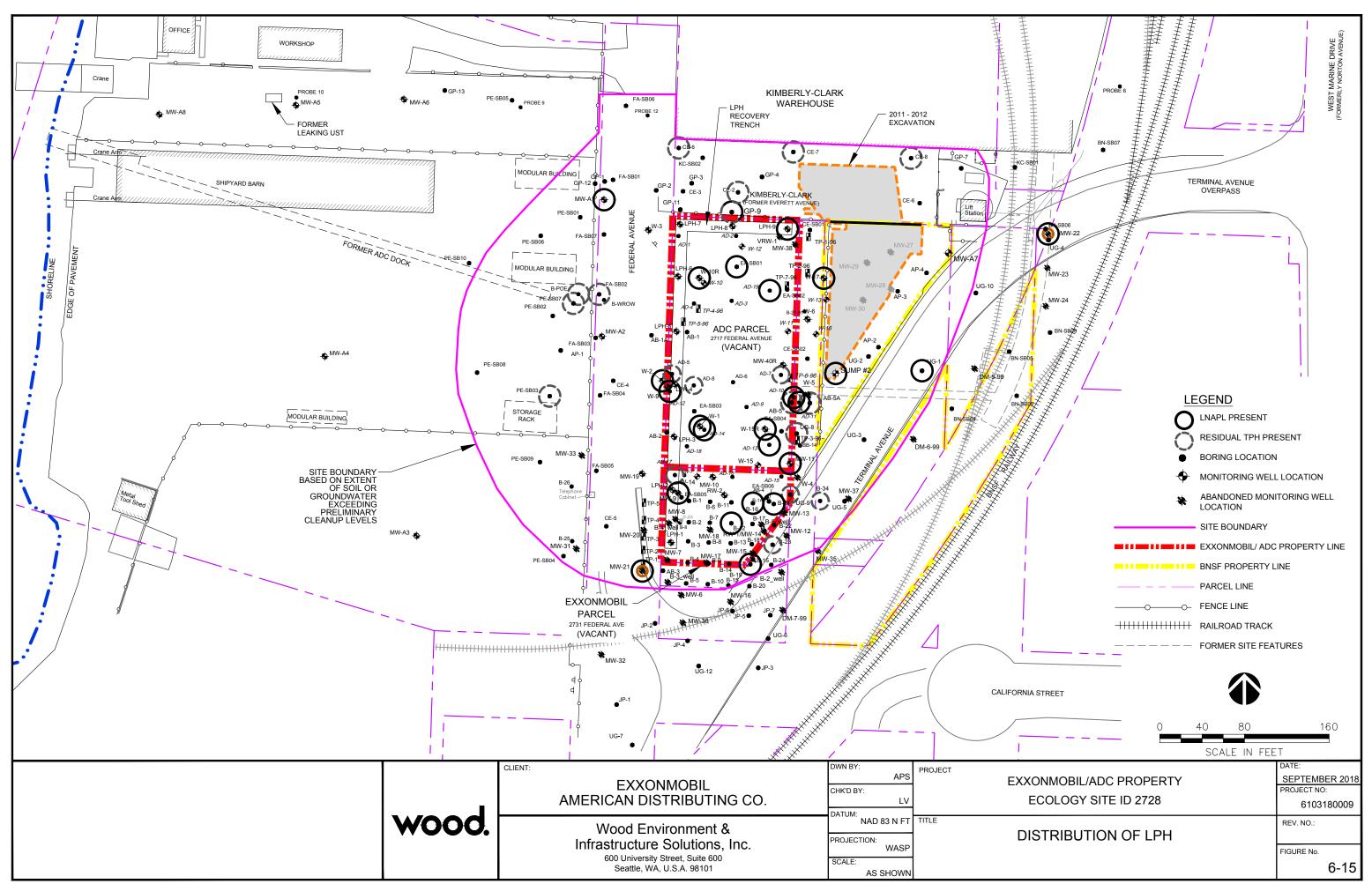


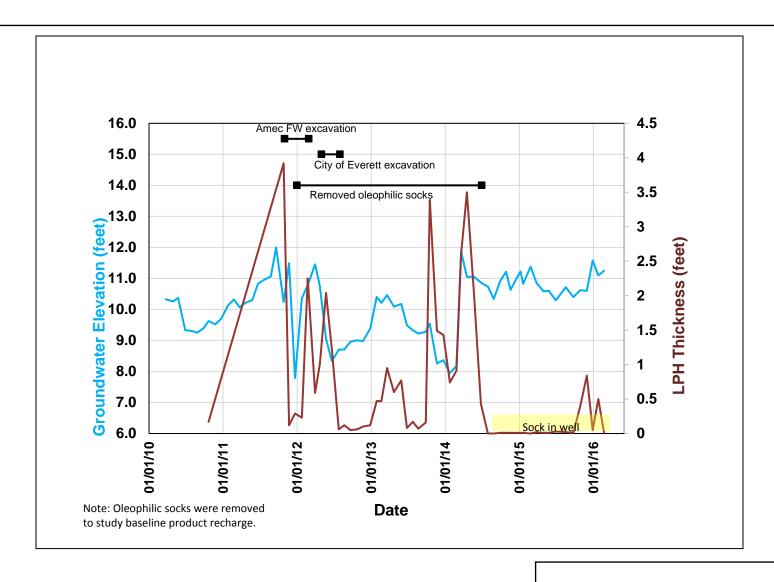






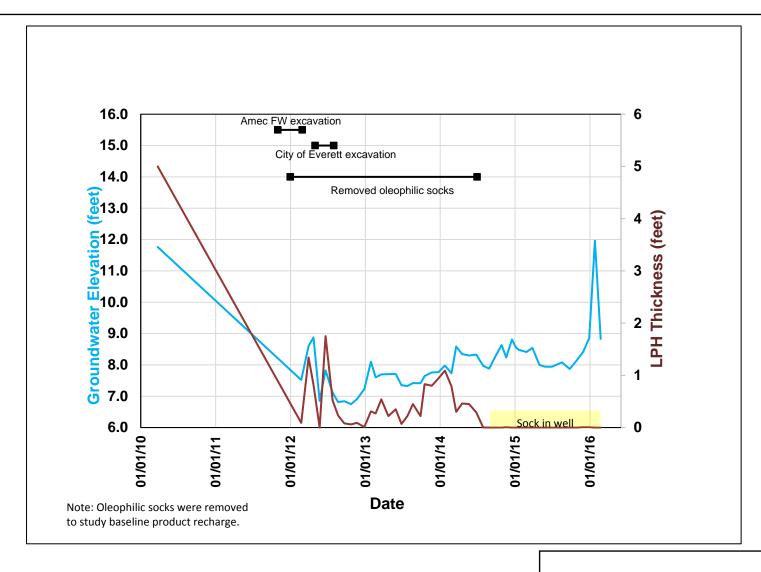






W-1 GROUNDWATER ELEVATION AND LPH THICKNESS
ExxonMobil/ADC Property
Everett, Washington

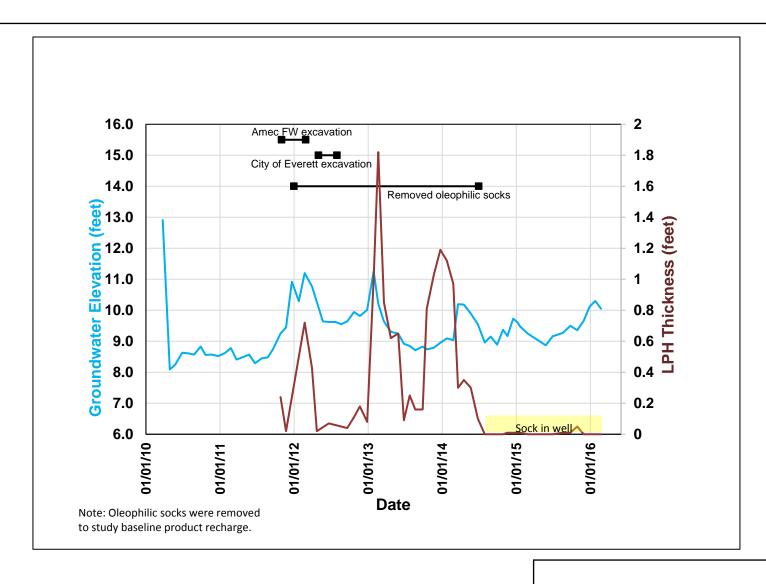
By: KK | Date: 03/01/2017 | Project No. 6103170009 |
Figure 6-16



W-2 GROUNDWATER ELEVATION AND LPH THICKNESS
ExxonMobil/ADC Property
Everett, Washington

By: KK Date: 03/01/2017 Project No. 6103180009

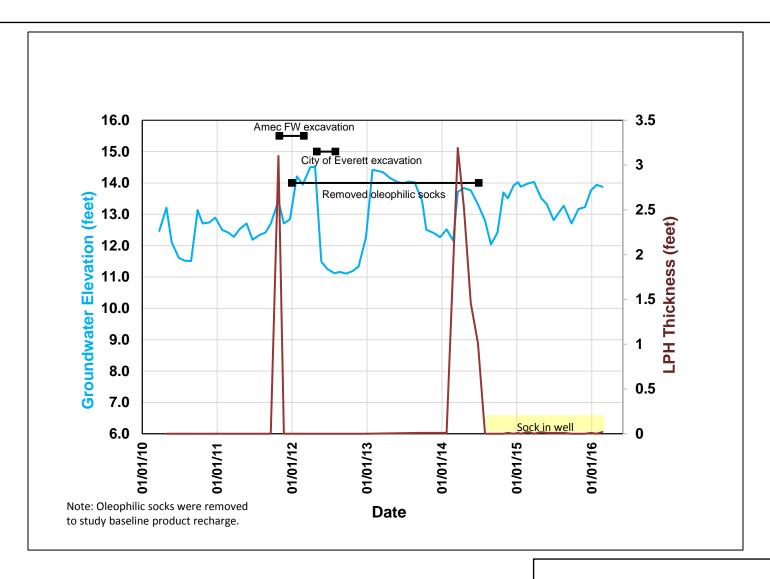
Figure 6-17



W-10R GROUNDWATER ELEVATION AND LPH THICKNESS
ExxonMobil/ADC Property
Everett, Washington

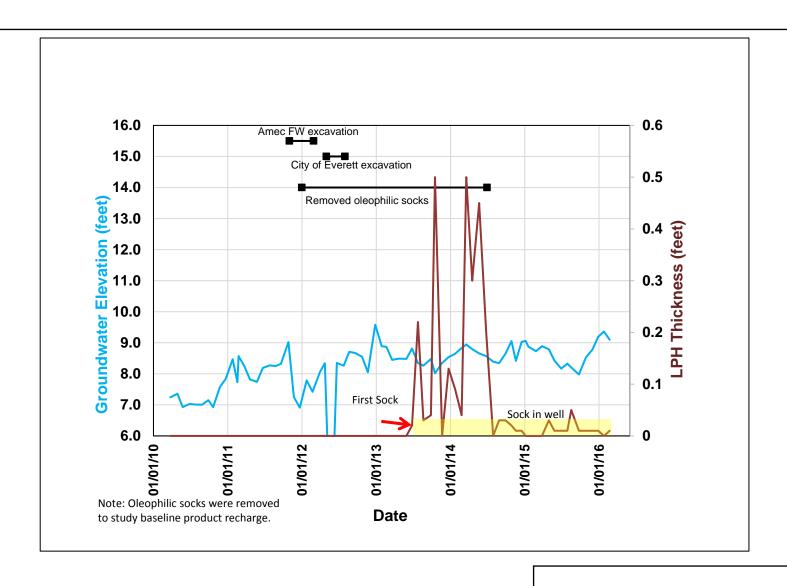
By: KK Date: 03/01/2017 Project No. 6103180009

Figure 6-18



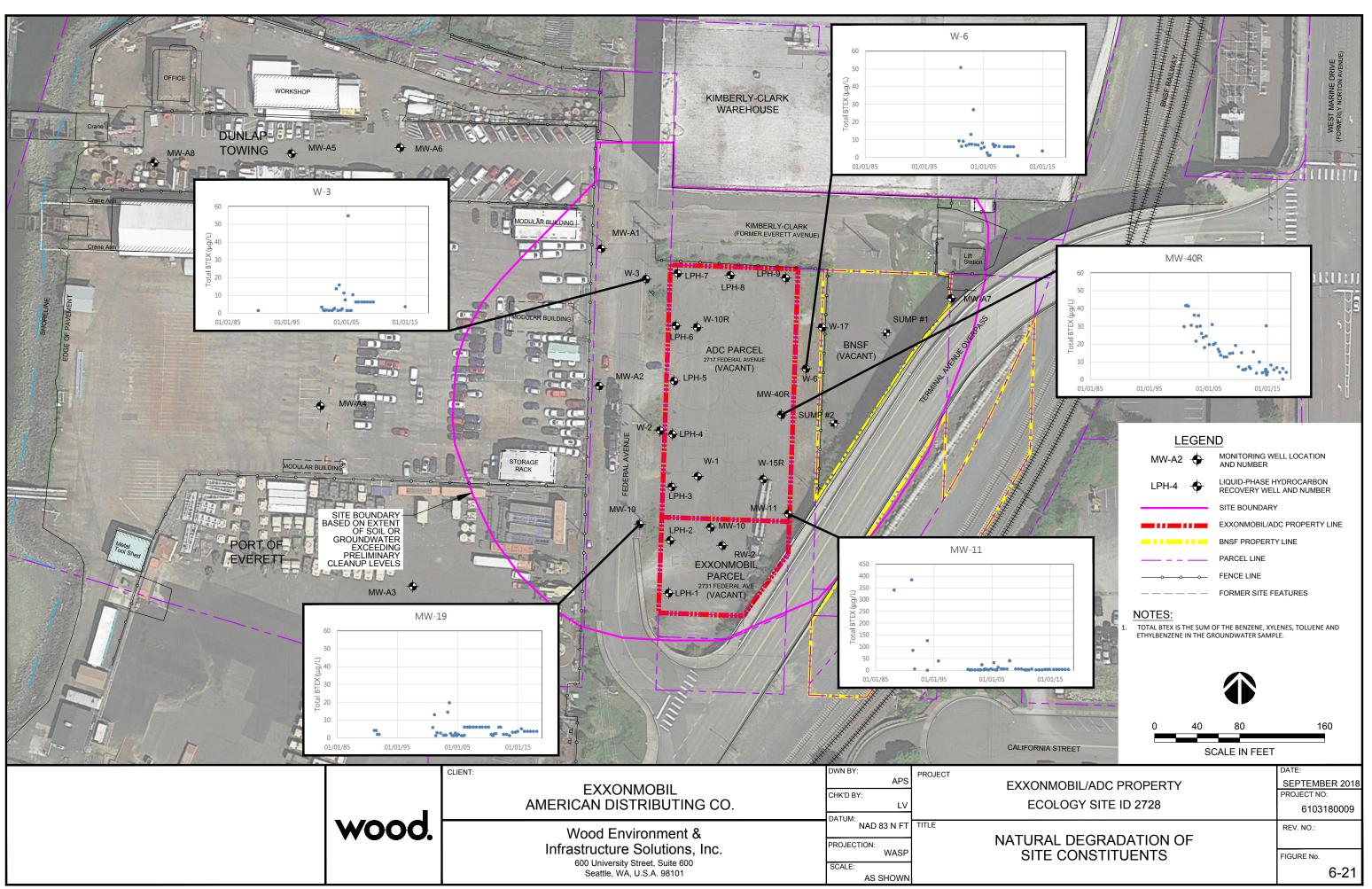
W-15R GROUNDWATER ELEVATION AND LPH THICKNESS
ExxonMobil/ADC Property
Everett, Washington

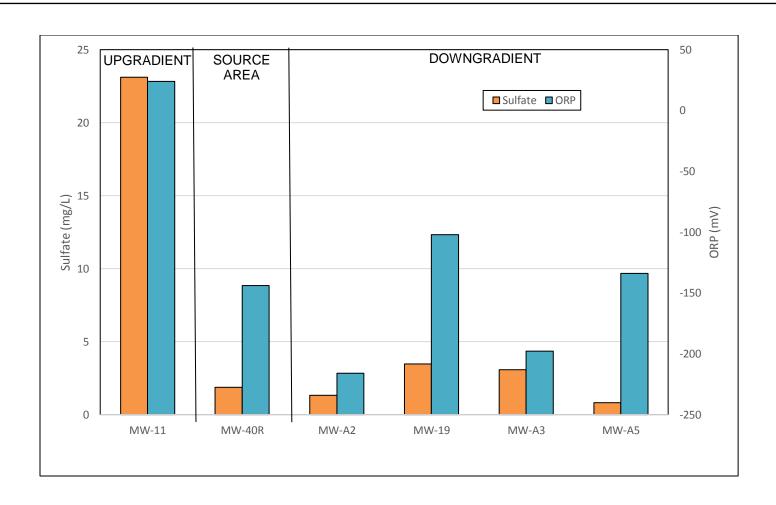
By: KK | Date: 03/01/2017 | Project No. 6103150009 | Figure 6-19



MW-A1 GROUNDWATER ELEVATION AND LPH THICKNESS
ExxonMobil/ADC Property
Everett, Washington

By: KK | Date: 03/01/2017 | Project No. 6103150009 | Figure 6-20





1. Data from November 2010 Data Gaps sampling event.

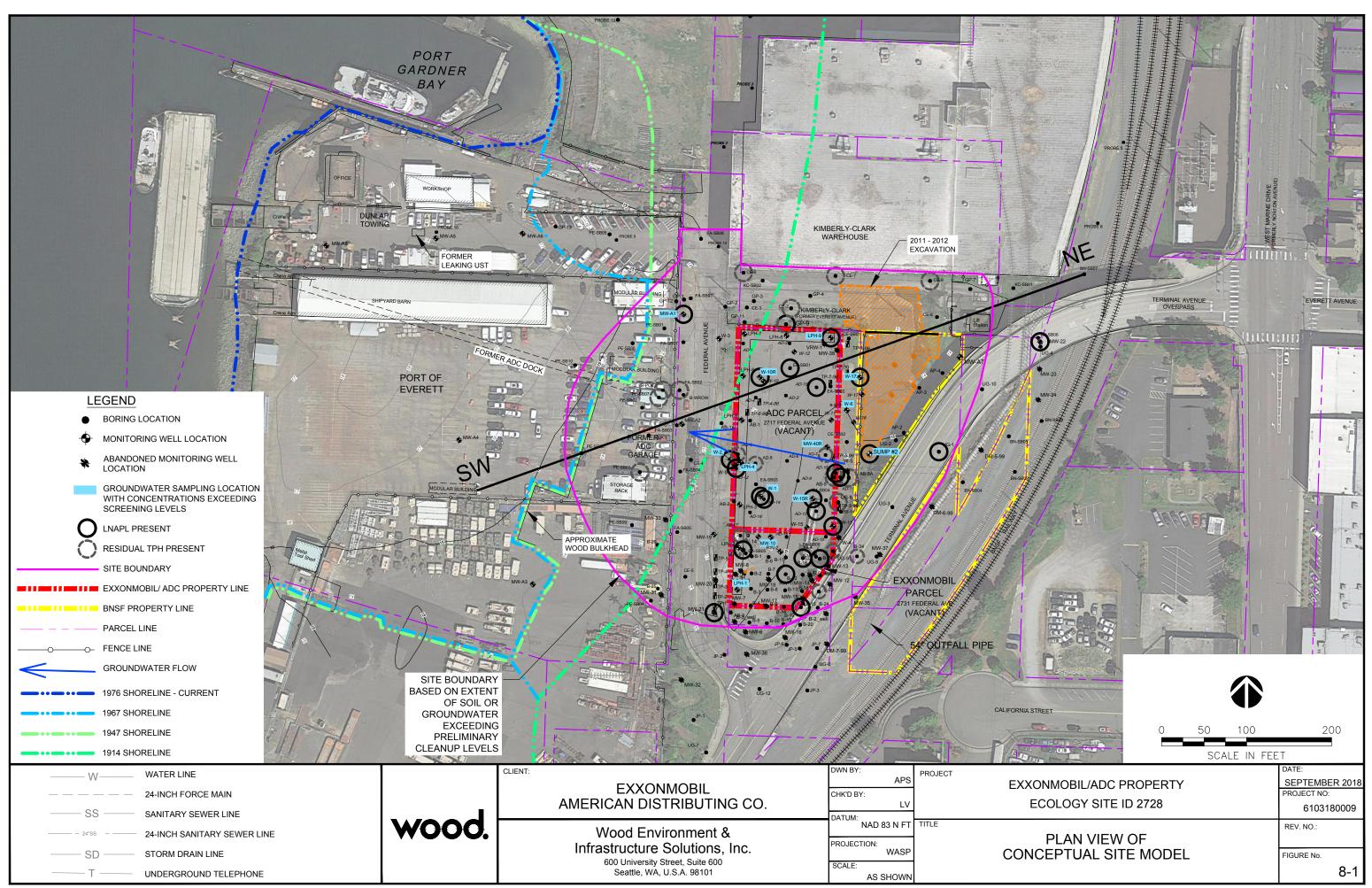
Abbreviations mg/L = milligrams per liter

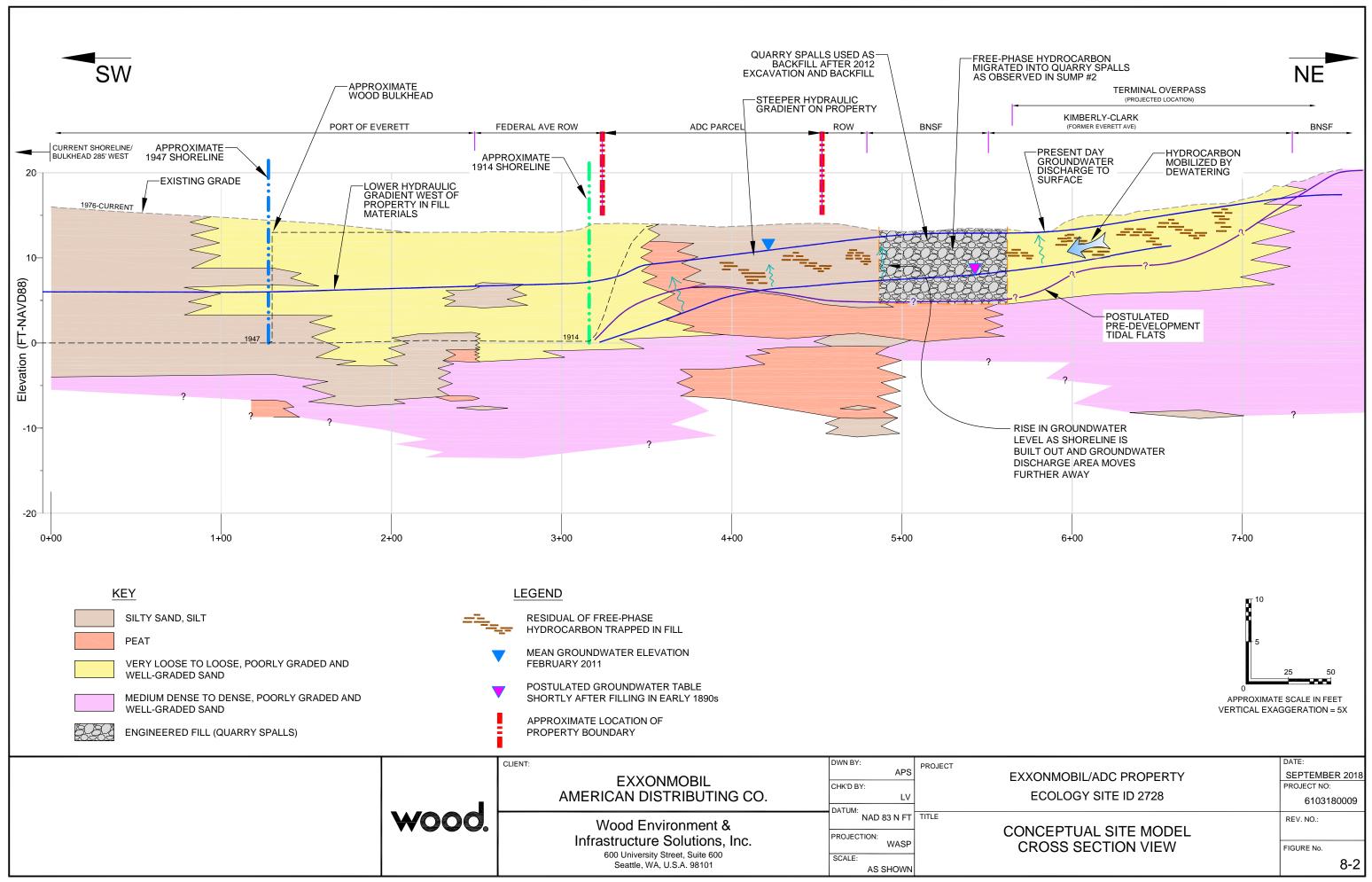
mV = millivolts

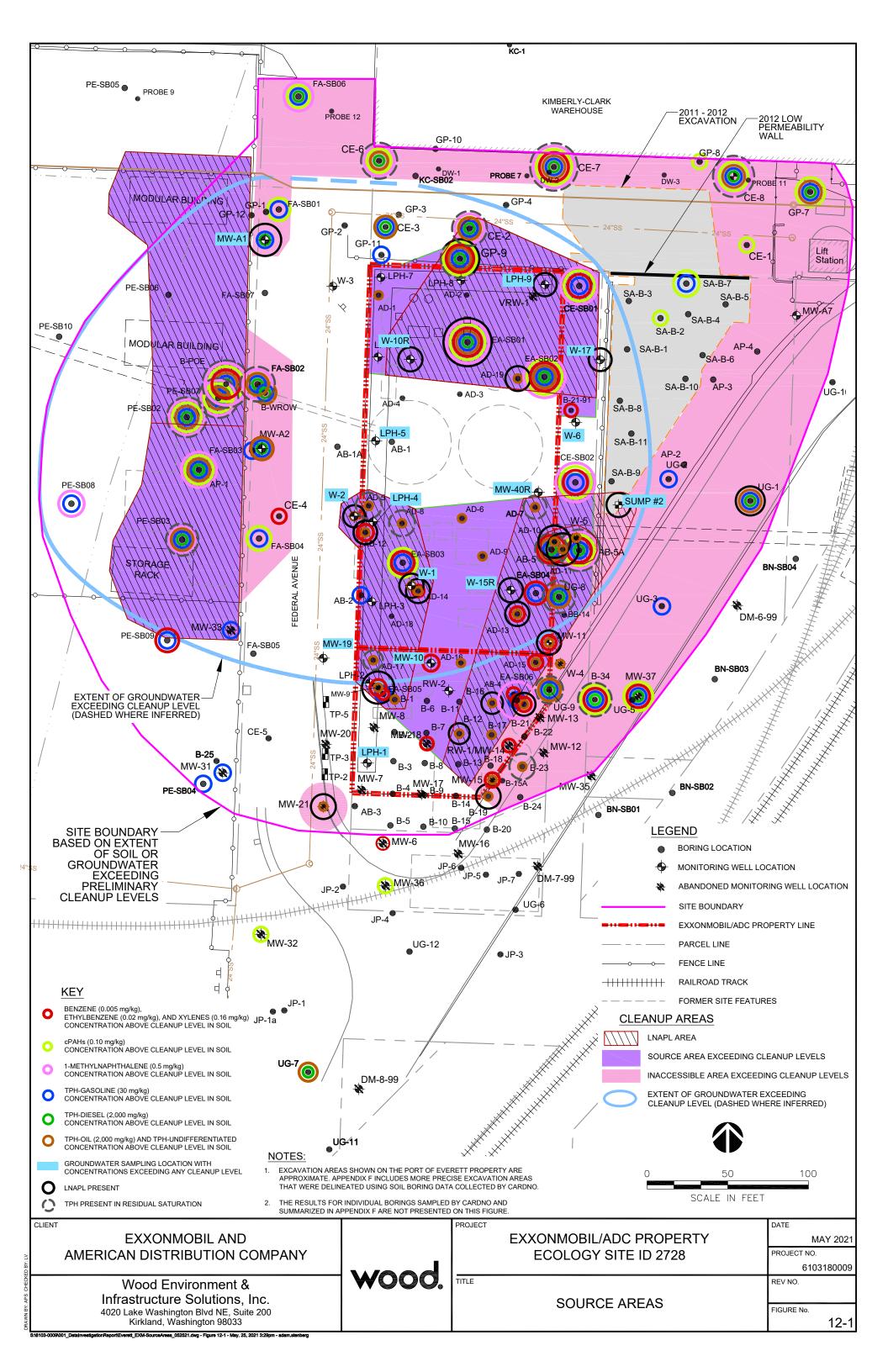
ORP = oxidation-reduction potential

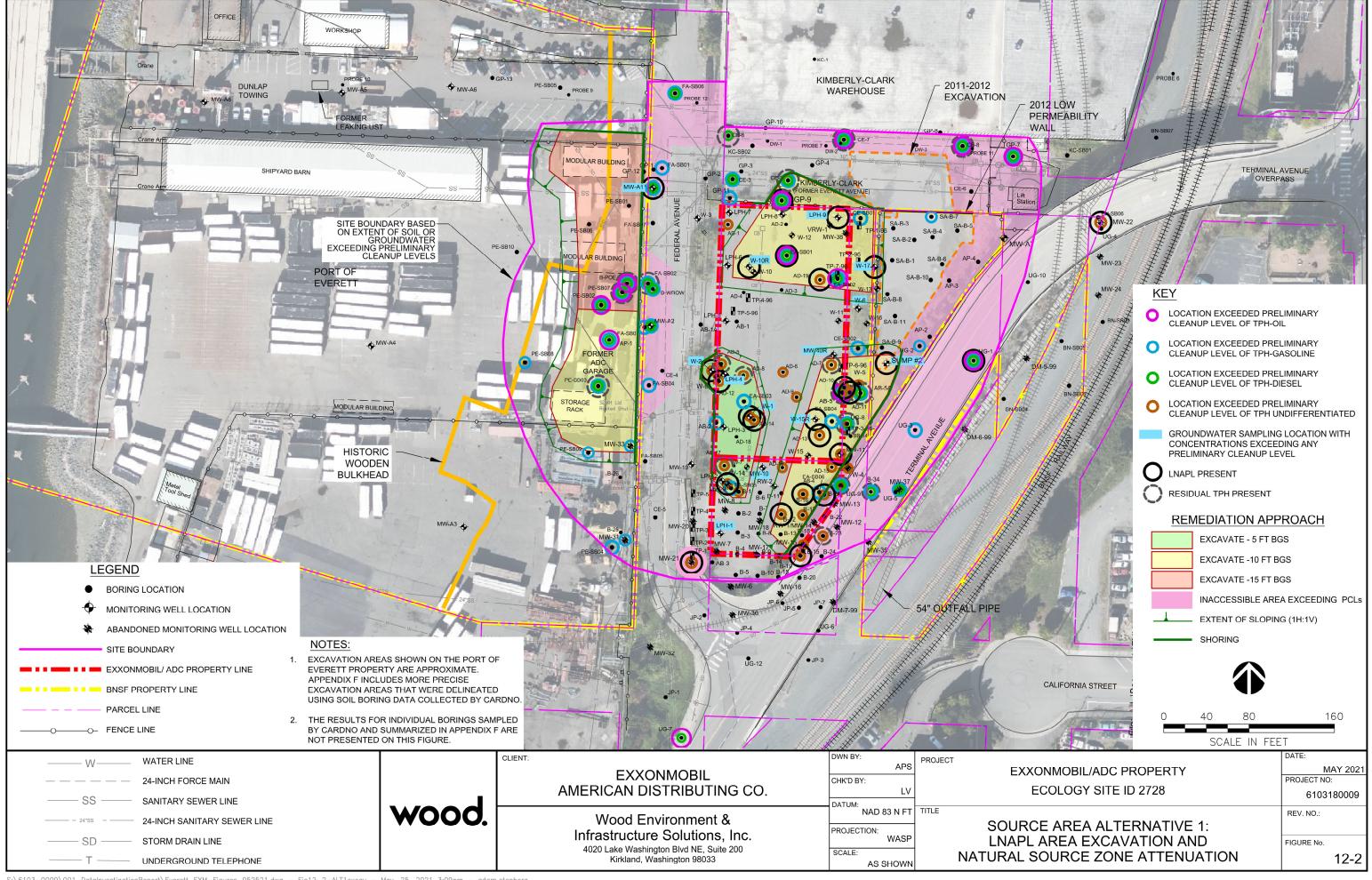
NATURAL ATTENUATION PARAMETERS ExxonMobil/ADC Property Everett, Washington

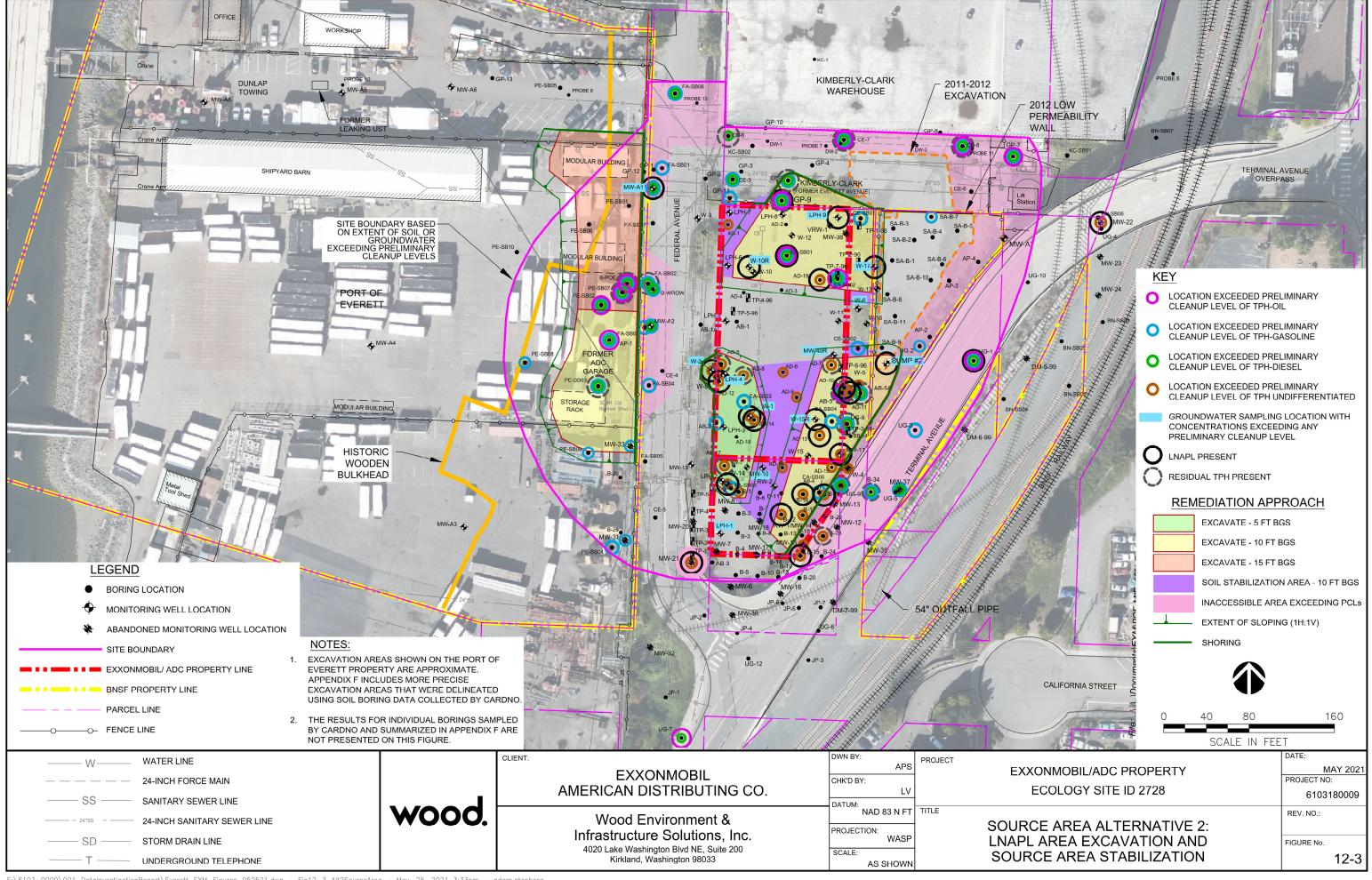
By: WY	Date: 9/21/2018	Project No.	6103180009
wood.		Figure	6-22

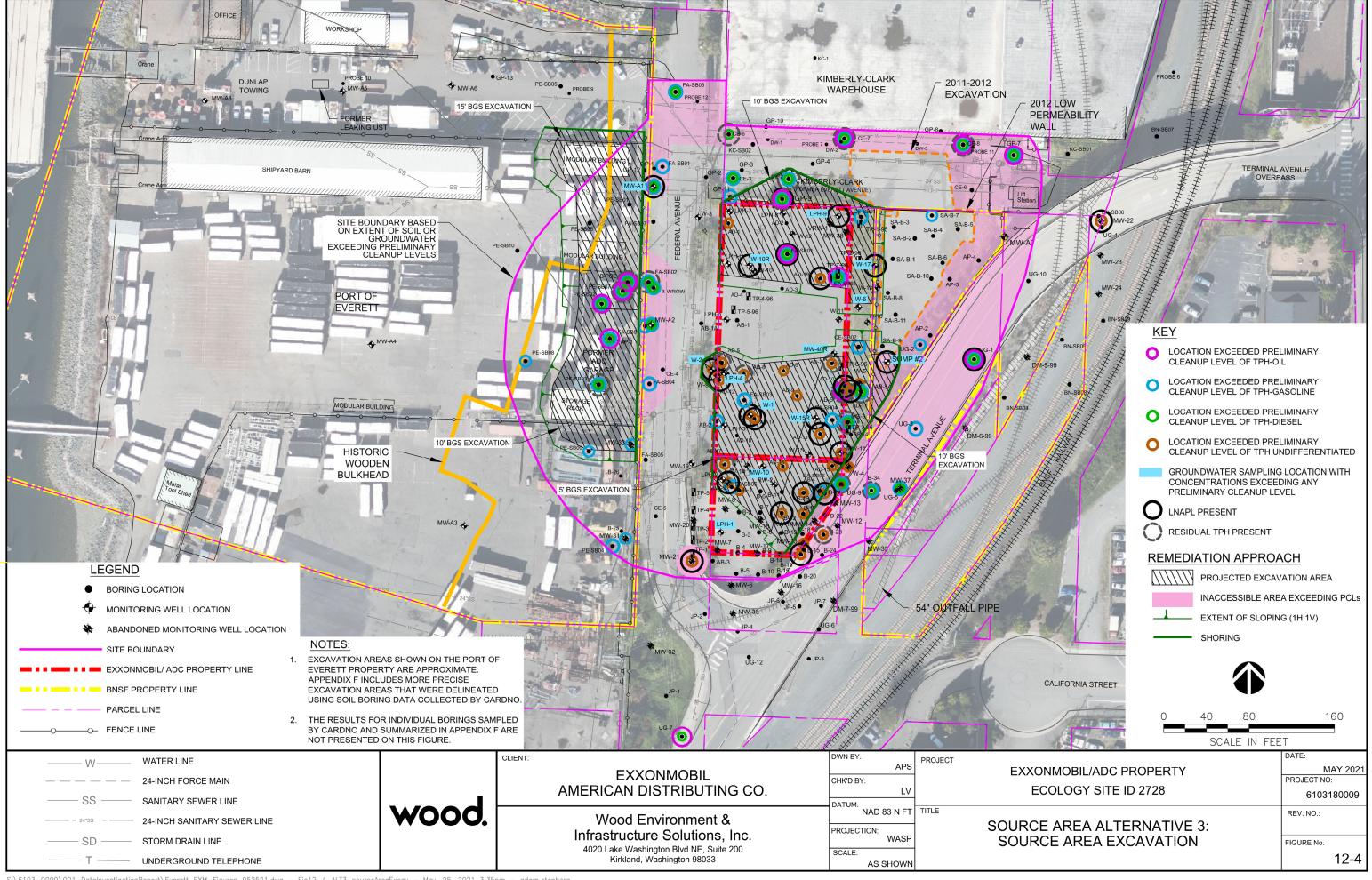


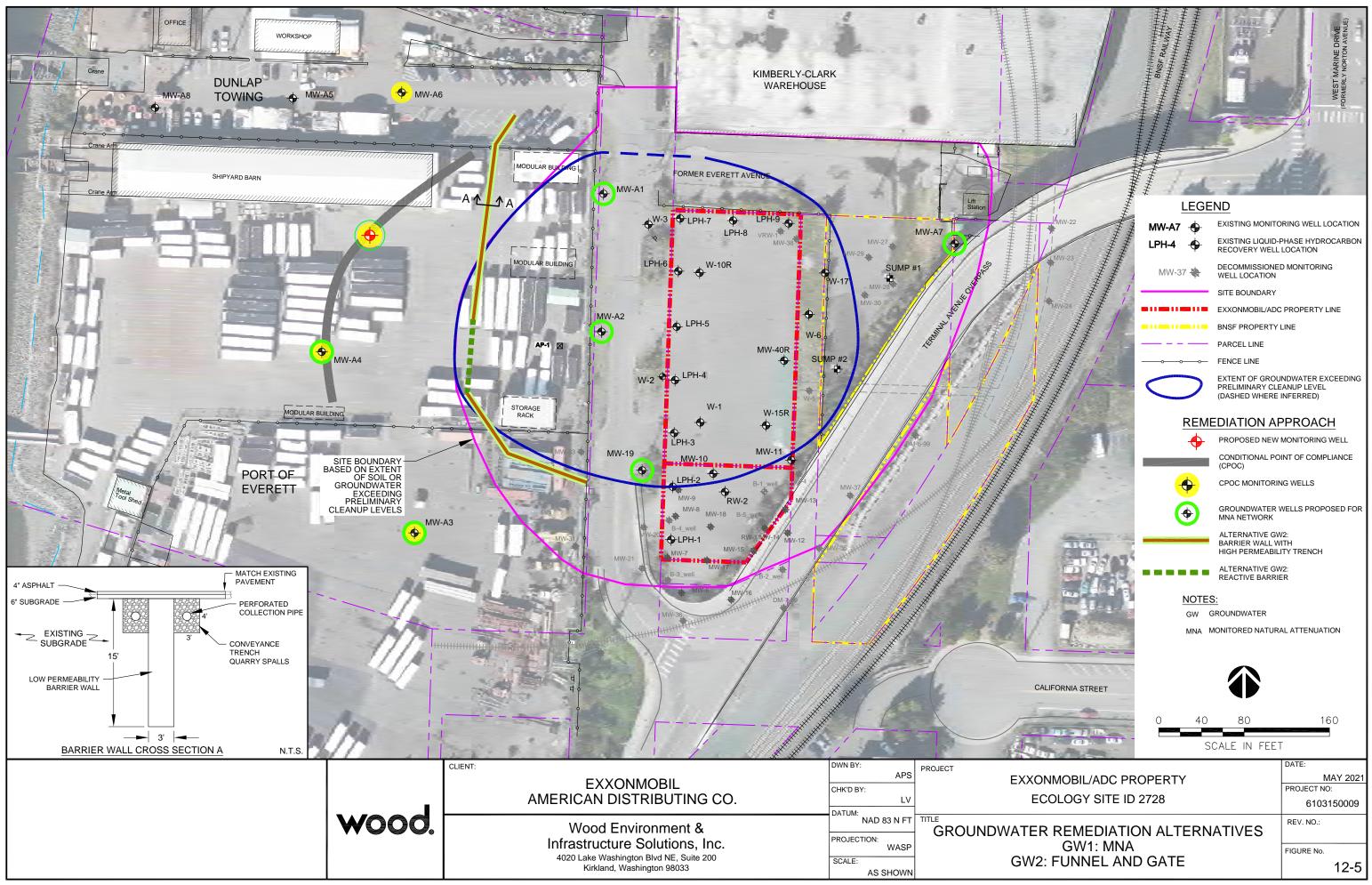






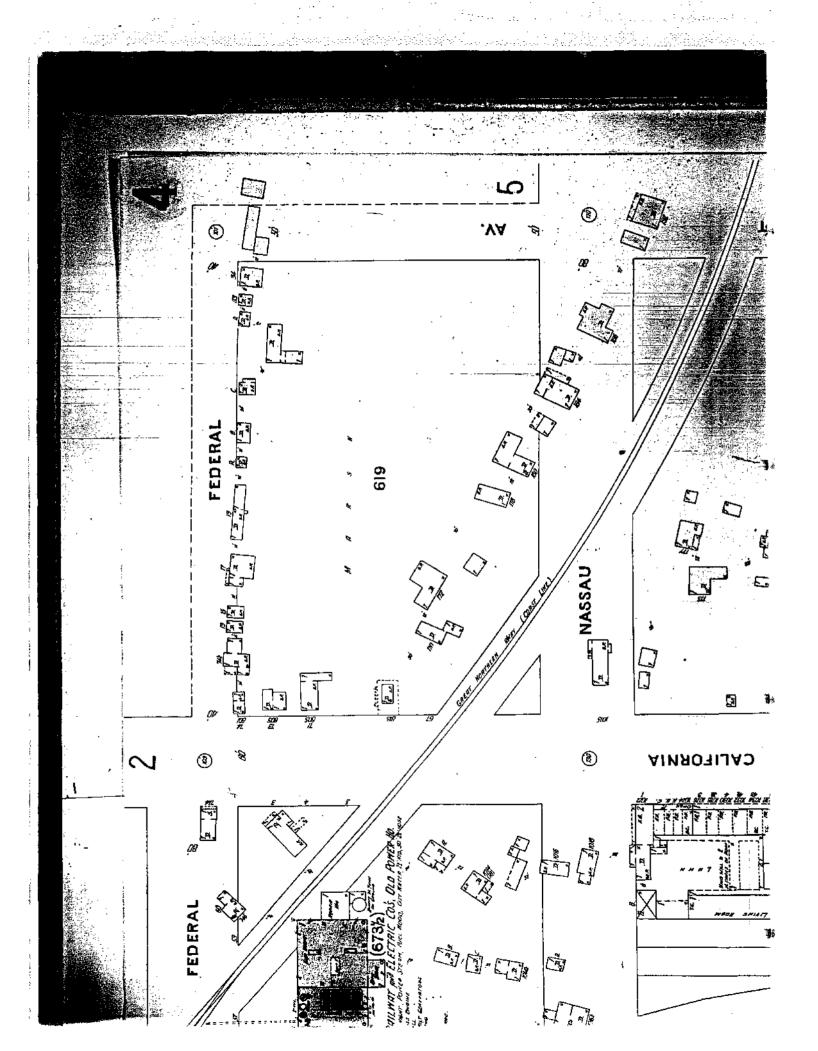






APPENDIX A HISTORICAL MAPS AND DOCUMENTATION





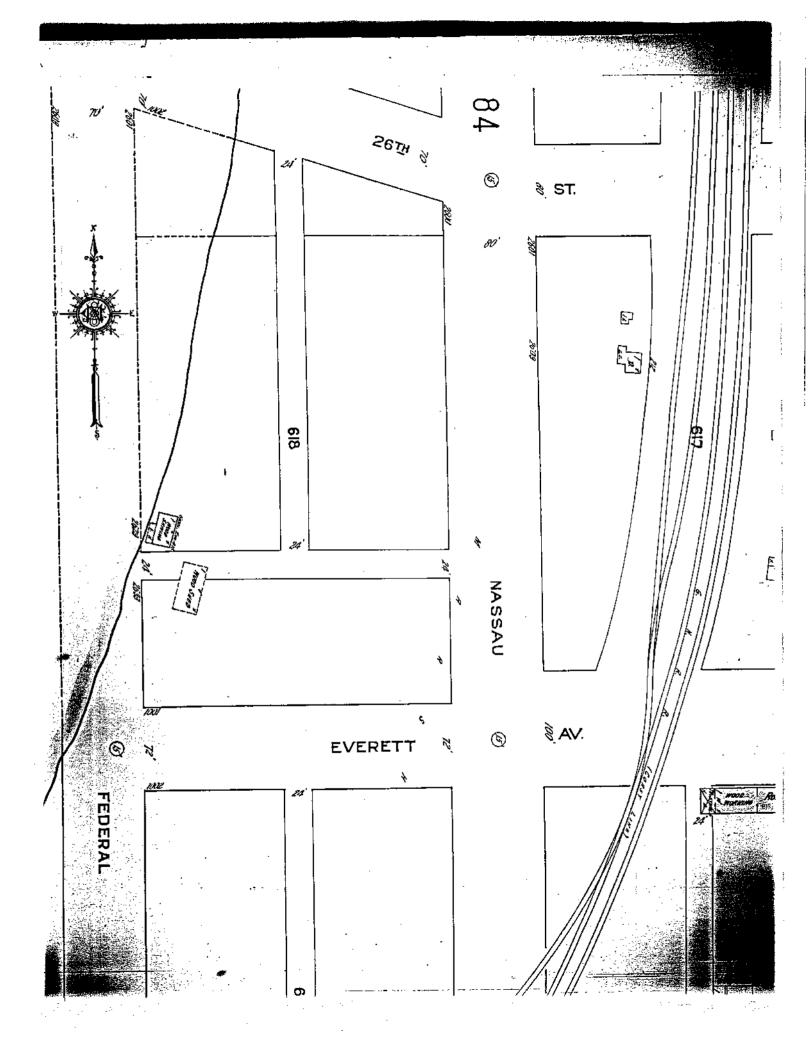


Published by the





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The regular Administrative Session of the City Council was held August 16, 1915, at 10:30 A.M. with Mayor Clay in the Chair and Commissioners Clay, Kelly and Salter present at roll call.

On motion minutes approved as of record. Moved by Kelly, seconded by Salter, that bills of A. C. Chilson for \$6.00 and H. J. Linden for \$11.65 for services as registration clerks beallowed and ordered paid.

Carried unanimously

Moved by Kelly, seconded by Salter that the City Attorney be instructed to prepare an ordinance covering the installation of oil tanks north of the G. N. Dock.

Carried unanimously

Moved by Kelly, seconded by Clay that the City Attorney be instructed to prepare an ordinance regulating the speed of Street Railway cars to conform to the speed allowed autos.

Carried unanimously

On motion Council adjourned at 11:00 A. M.

City Clerk

EXHIBIT D

An ordinance granting to the Standard Oil Company, a corporation, a permit to locate, erect, operate and maintain a warehouse or tankage, or both, and other necessary buildings, on a certain tract of land in the city of Everett described as follows: Lot 1, block 619, Plat of Everett, at the corner of Everett Avenue and Federal Street, for the storage and distribution of petroleum and its products, and other kinds of merchandise, by said company, and declaring an emergency.

THE CITY OF EVERETT DOES ORDAIN:

Section 1: That the Standard Oil Company, a corporation, be and it is hereby granted permission to locate, erect, operate and maintain a warehouse or tankage, or both, and other necessary buildings, upon that certain tract of Tand in the city of Everett described as follows: Lot 1, block 619, Plat of Everett, at the corner of Everett Avenue and Federal Street, for the storage and distribution of petroleum and its products, and other kinds of merchandise handled by said company, said warehouse, tankage and buildings to be constructed in accordance with the plans and specifications therefor filed by said company with the city clerk of the city of Everett and now on file in the office of said clerk.

Section 2: WHEREAS, it is desirous to begin the construction of said warehouse, tankage and buildings immediately, an emergency is declared to exist, and this ordinance shall take effect upon its passage and publication.

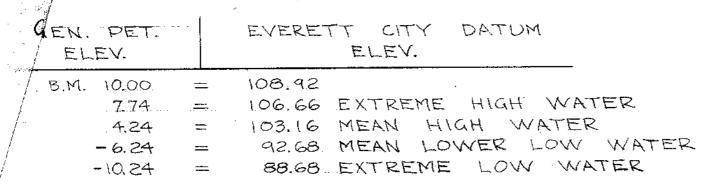
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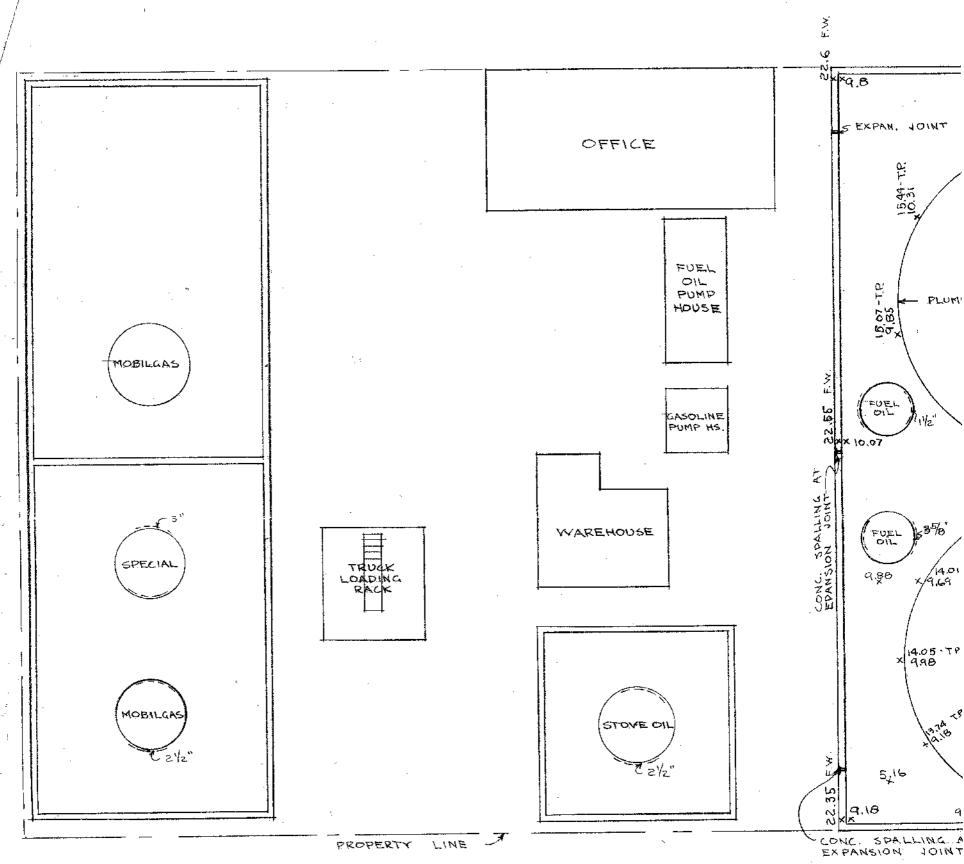
Published

AUG 2 4 1915

Attest Zour Lity Clerk.

AUG 2 9 1915





MOTES

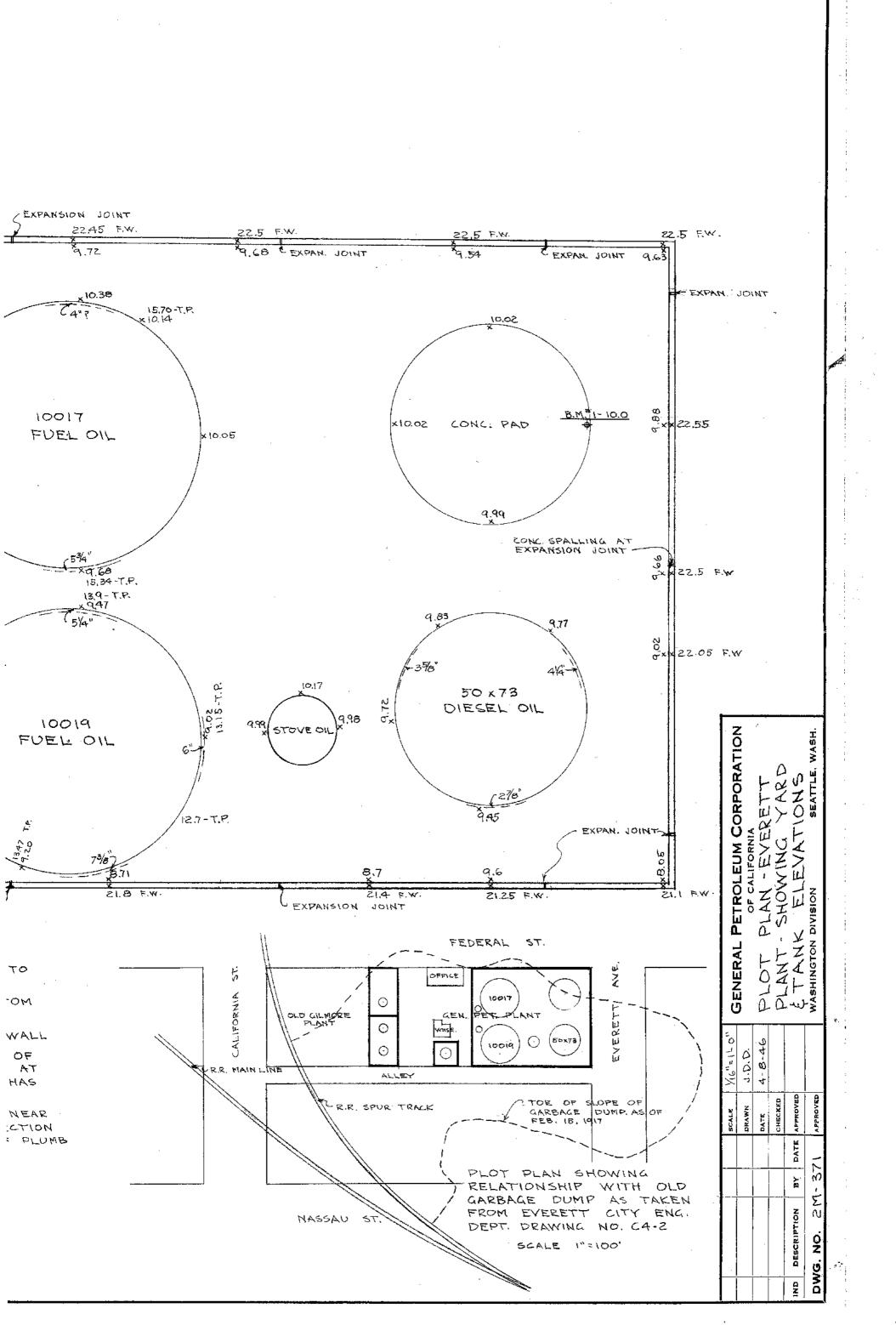
ELEVATIONS EXCEPT AS INDICATED BELOW ARE

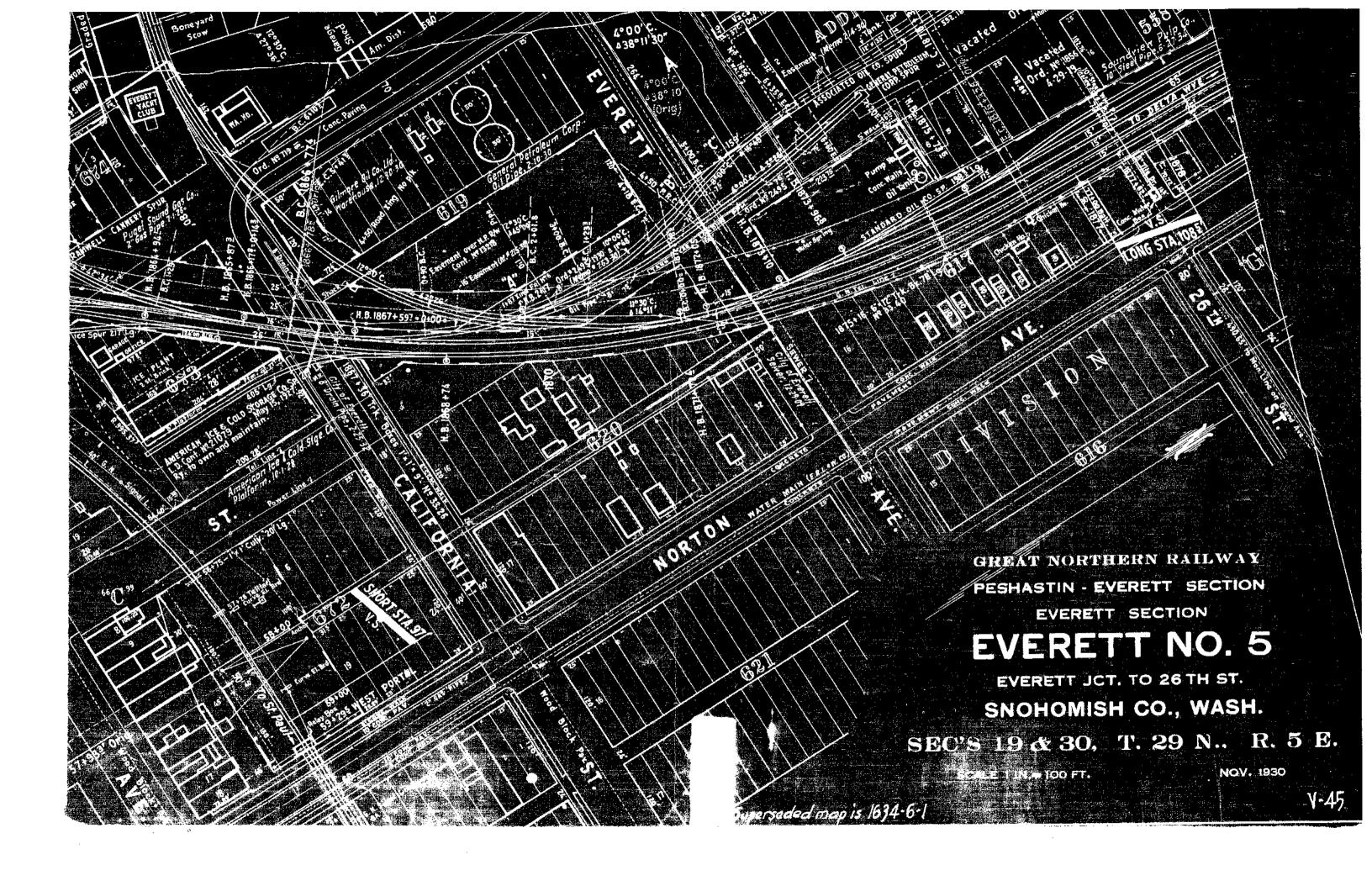
T.P. INDICATES ELEVATION AT TOP OF BO

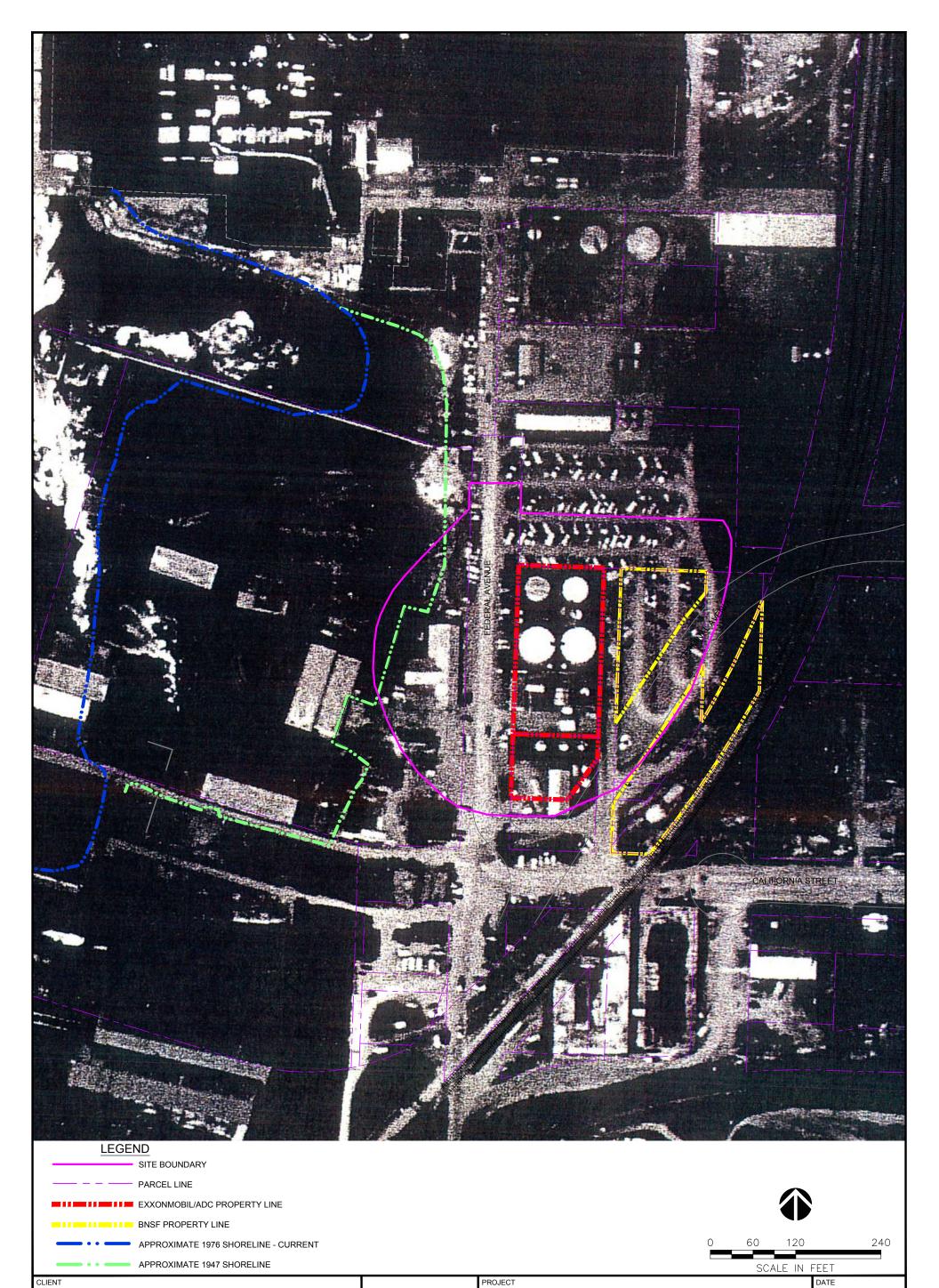
F.W. INDICATES ELEVATION AT TOP OF

ELEVATIONS SHOWN AROUND OUTSIDE EDGITANKS ARE TO TOP OF CONC. PAD EXCENTION NO. 10019 WHERE ORIGINAL RING PATEURK AND BEEN COVERED WITH DIRT

DOTTED LINES AND DIMENSIONS IN INCHE OUTSIDE EDGE OF TANKS INDICATE THE D AND DISTANCE IN WHICH THEY ARE OUT







CLIENT

EXXONMOBIL AND AMERICAN DISTRIBUTION COMPANY

Wood Environment & Infrastructure Solutions, Inc. 600 University Street, Suite 600 Seattle, Washington 98101 wood.

EXXONMOBIL/ADC PROPERTY ECOLOGY SITE ID 2728

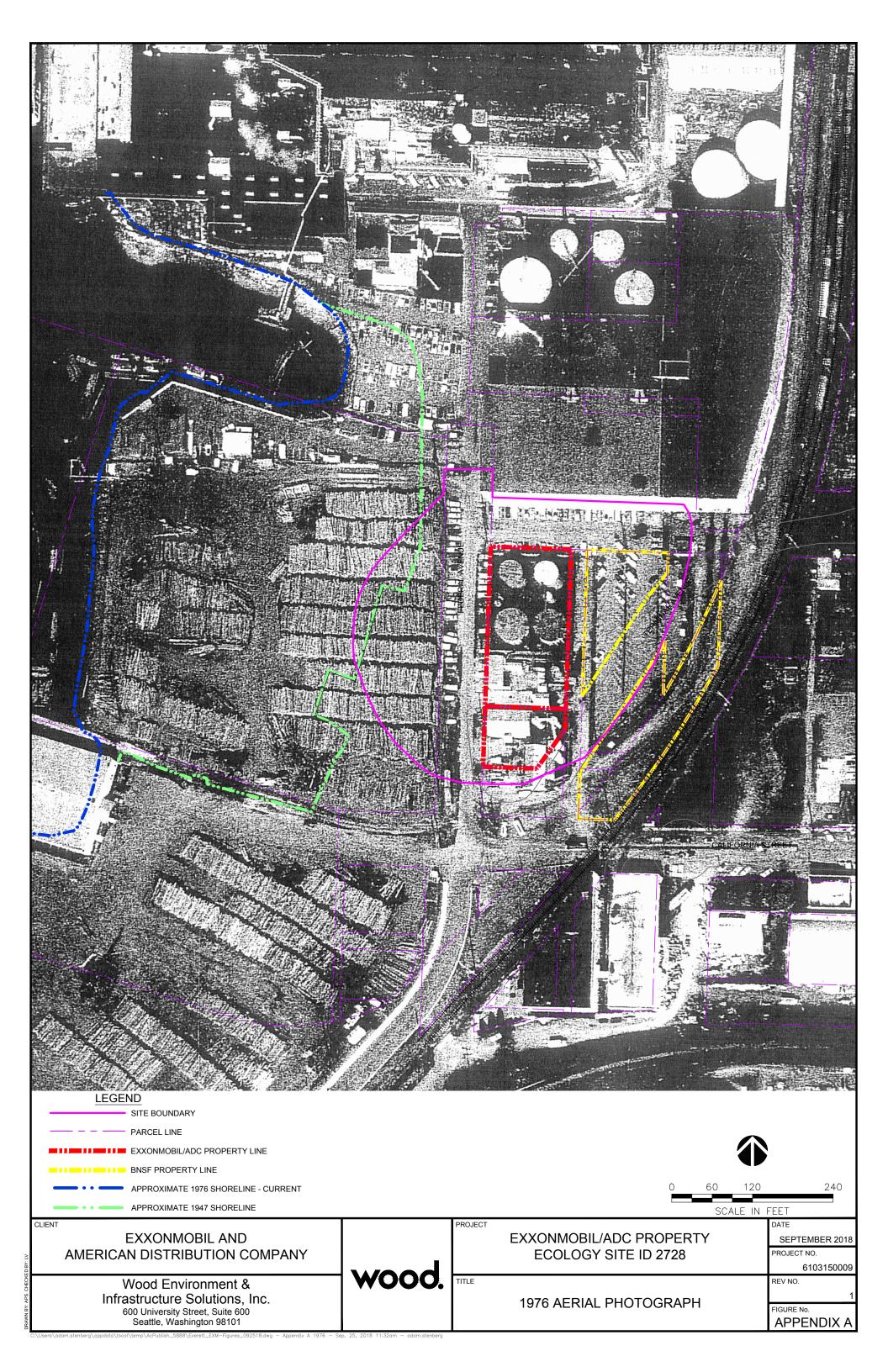
1955 AERIAL PHOTOGRAPH

SEPTEMBER 2018
PROJECT NO.

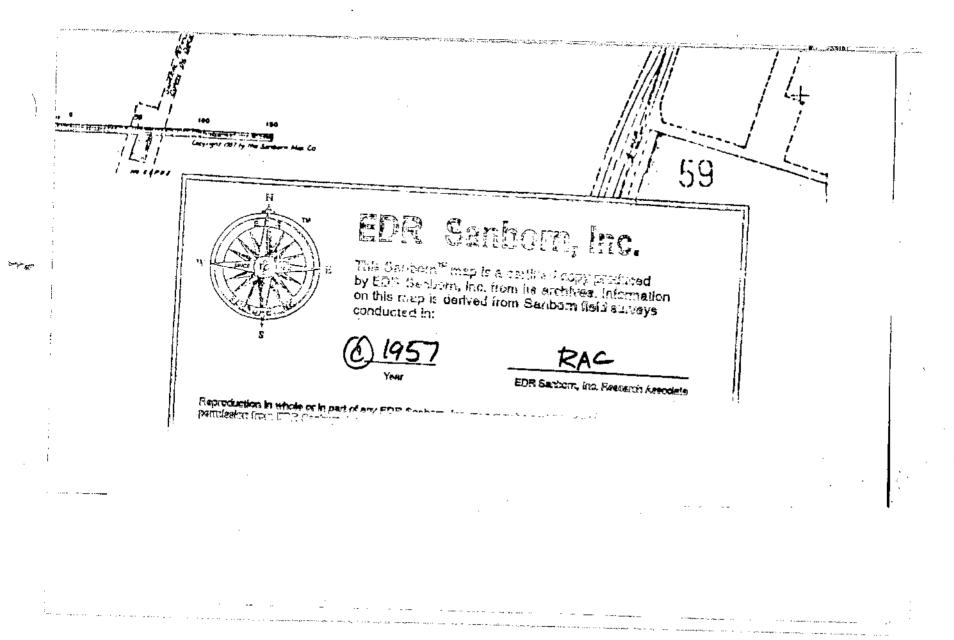
6103150009 REV NO.

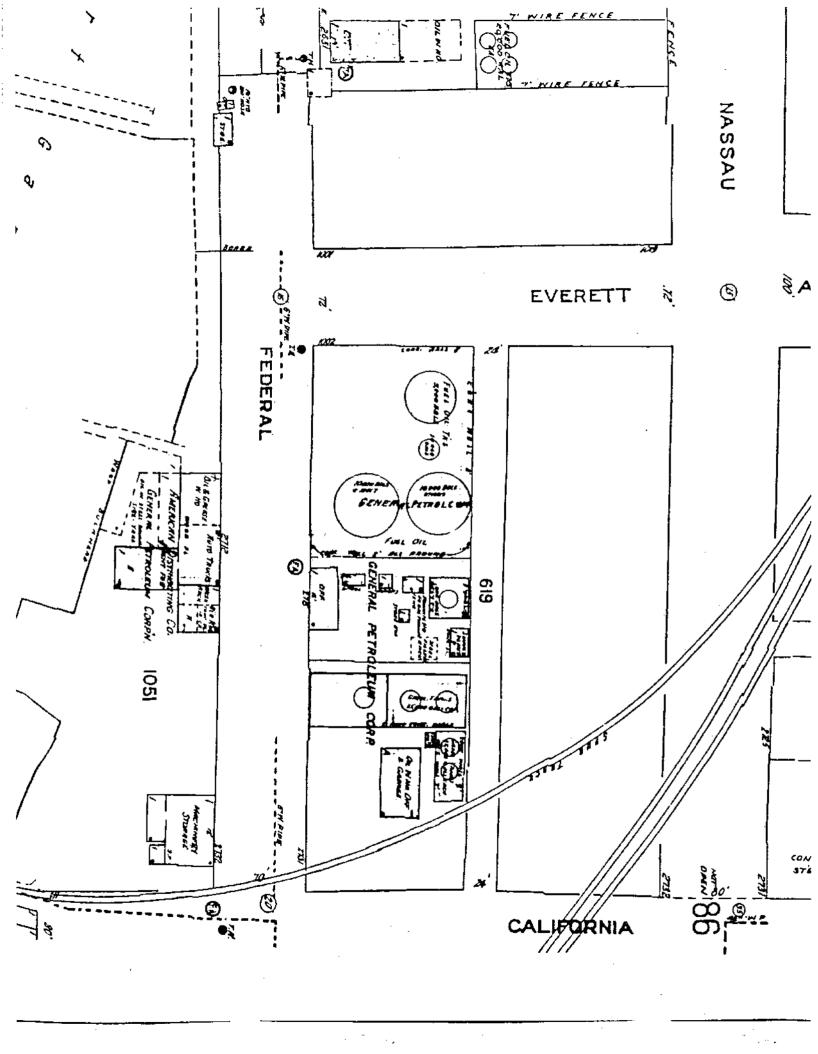
FIGURE No.

APPENDIX A



EVERETT AVE.		
		EVERETT AVE.
		The state of the s
American Pila Priving Corrigon, Sine	American Pila Priving Correspond Site	TIVELE STATE OF THE STATE OF TH





APPENDIX B

BORING LOGS
AND MONITORING
WELL LOGS

Appendix B

Lithologic Logs

1001

Observed groundwater level
(ATD = at time of drilling)



RITTENHOUSE-ZEMAN & CESTOCIATES IN E Environmental Consultants 1400 140th Ave NE Bellevue, Washington 98005

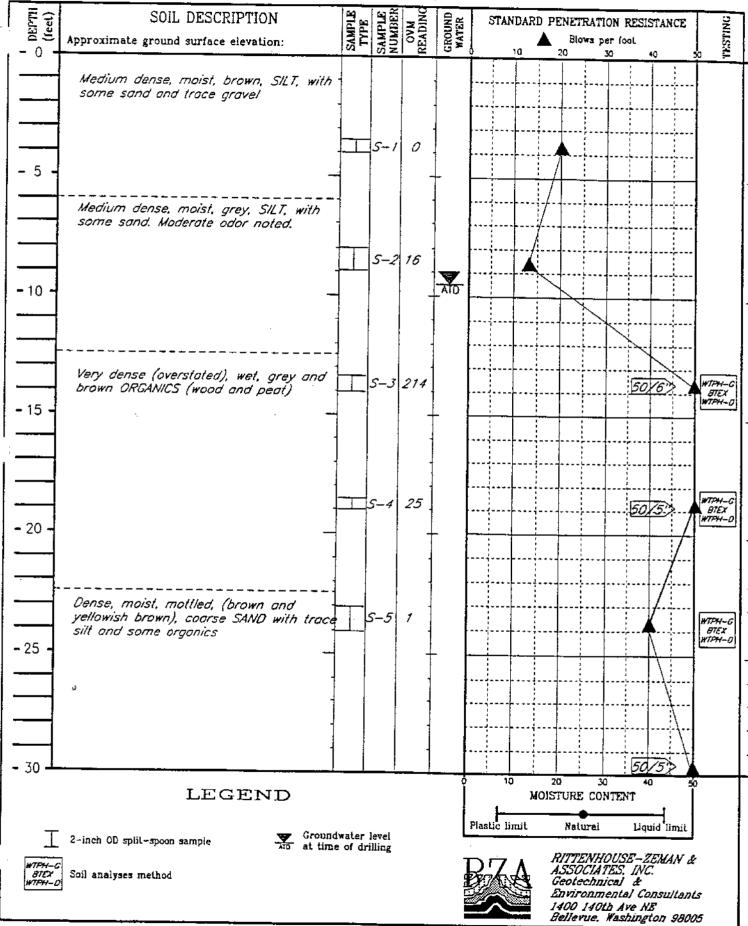
WELL TIP

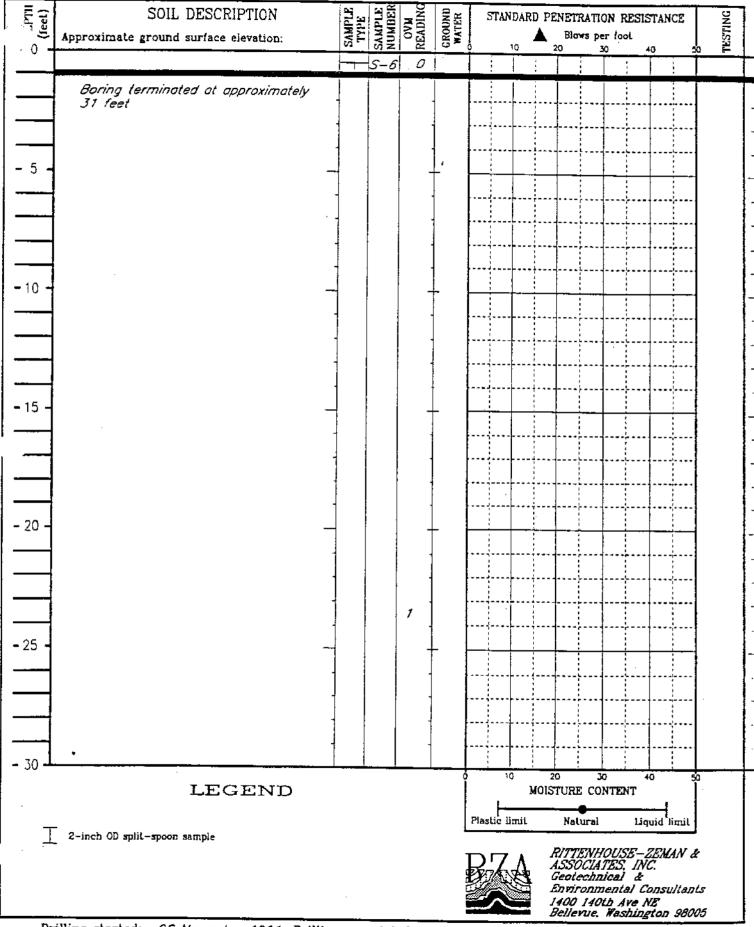
NATURAL WATER

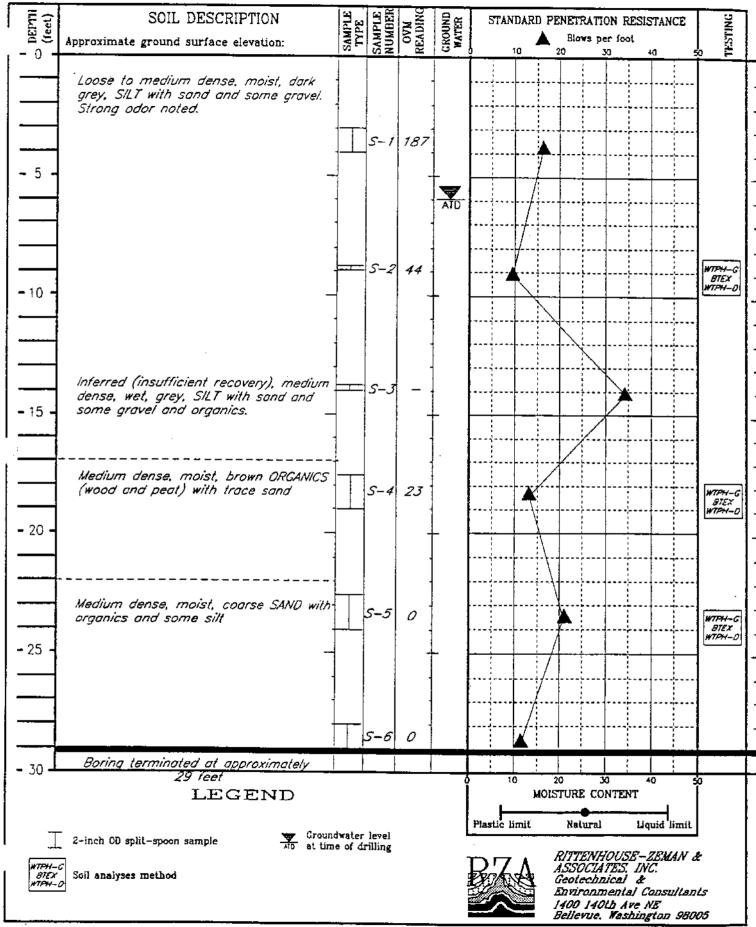
← PLASTIC LIMIT

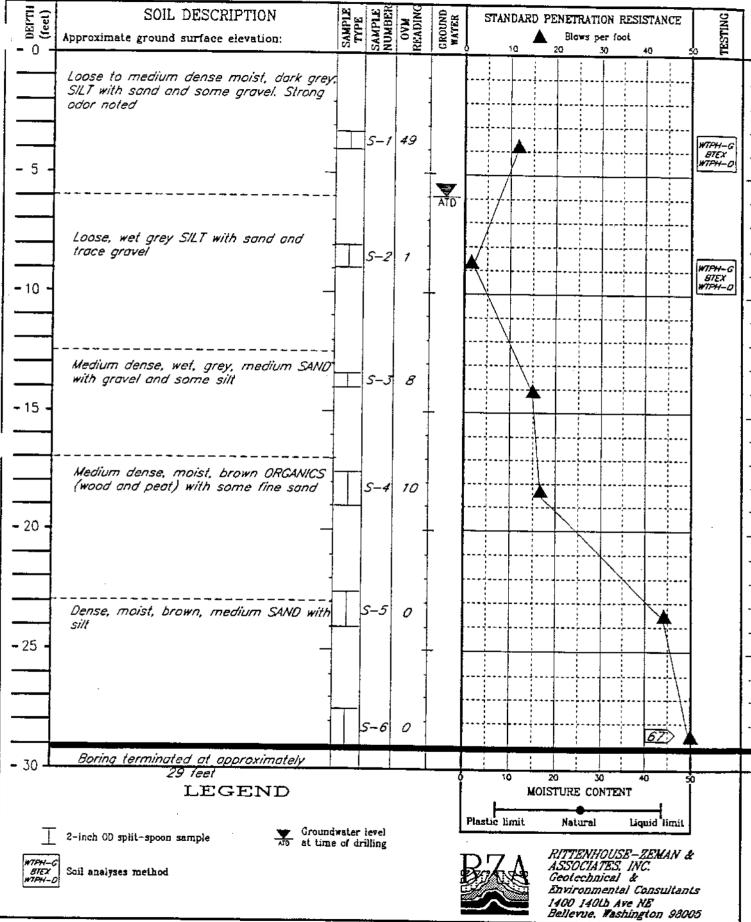
BULK SAMPLE

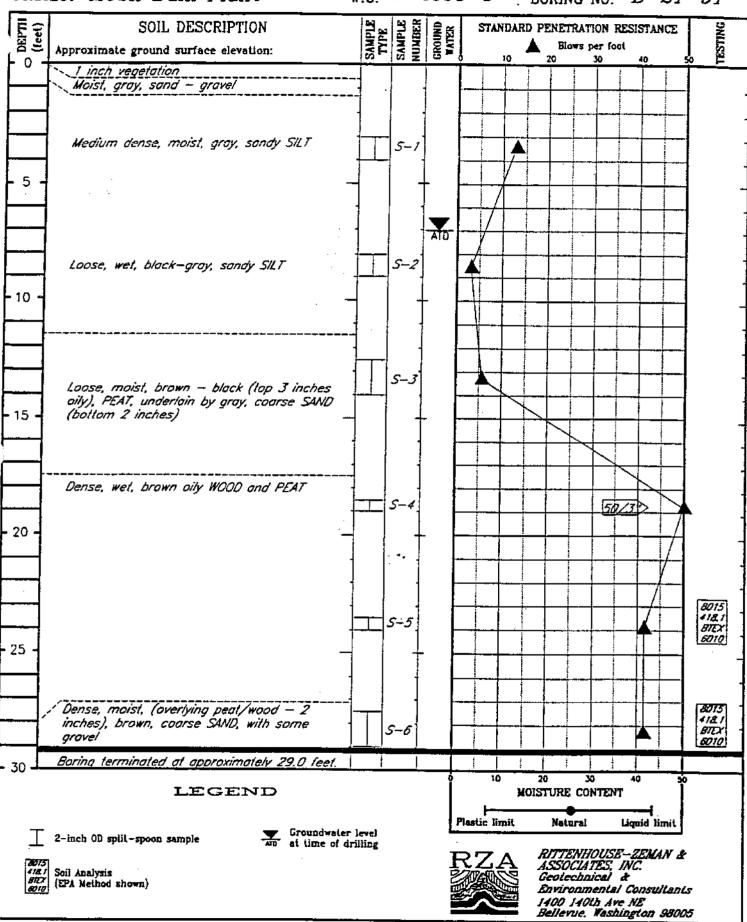
* SAMPLE NOT RECOVERED











PROJECT: Everett Mobil Bulk Plant W.O. 11-04558-04 WELL NO. B-34 Elevation reference: N/A Well completed: N/A Page ! AS-BUILT DESIGN Ground surface elevation: N/A Casing elevation: N/A of 1 OVM READING DEPTH (feet) BLOW SOIL DESCRIPTION TESTING 0 Boring abandoned by backfilling with bentonite. Loose, moist, brown, silty, fine to medium SAND interbedded with gray, S-I 5 17 sandy SILT with trace gravel S-2 69 5 ATD S-3 Medium dense to dense, saturated. gray, silty, fine to medium SAND with S-4 41 80 some wood debris 10 Grades to grayish-black, silty, medium to coarse SAND S-5 12 Bottom of boring at 14 feet. 15 . Petroleum-like staining and odor observed in all samples. Field FT-IR analysis of sample S-5 indicated > 10,000 ppm TPH. 20 25 30 LEGEND RZA AGRA, Inc. 2-inch O.D. Observed groundwater level Geotechnical & Environmental Group split-spoon sample ATD = at time of drilling 11335 NE 122nd Way, Suite 100 3-inch QD Shelby sampler Kirkland, Washington 98034-6918

Drilling started:

Bobcat Boring Logs

BR-1

Gray, moist to wet, silty, gravelly SAND with some cobbles. Slow seepage at approximately 1.0 foot; no other seepage encountered; soil exhibits a petroleum hydrocarbon-like odor. No LPH observed. Met with refusal at approximately 3.0 feet.

BB-2

Gray, moist to wet, gravelly SAND. Slow seepage at approximately 1.5 feet; no other seepage encountered; soil exhibits a petroleum hydrocarbon-like odor. Seepage from 1.5 foot depth pooled at bottom of boring and exhibits an irridescent sheen. No LPH observed. Boring terminated at a depth of approximately 4.0 feet.

BB-3

Gray, moist to wet, gravelly SAND with some gravel. Slow seepage below approximately 2.5 feet; soil exhibits a petroleum hydrocarbon-like odor. Discontinuous blebs of LPH observed on water pooled at the bottom of the boring. Boring terminated at a depth of approximately 4.0 feet. Boring allowed to remain open approximately two hours; discontinuous blebs of LPH still present on the water pooled in the bottom of the boring.

BB-4

Gray, moist to wet, silty, gravelly SAND with some wood debris. Slow seepage at approximately 1.0 foot; soil exhibits a petroleum hydrocarbon-like odor. Moderate seepage observed below approximately 3.5 feet. Approximately 0.01 to 0.02 feet of LPH accumulated on groundwater in the boring. Buring terminated at a depth of approximately 4.0 feet.

BB-5

Dark gray, wet, SAND with some silt, gravel, and wood debris. Moderate seepage observed below approximately 3.0 feet; soil exhibits a petroleum hydrocarbon-like odor. Boring terminated at a depth of approximately 4.0 feet; caved to approximately 3.5 feet. Gauged fluid at bottom of boring using Colorcut paste; it appeared to be 100% LPH. Collected two bottles of LPH for potential future laboratory analysis; collected one bag sample of soil for possible sieve analysis.

BB-6

Gray, moist to wet, gravelly, SAND with some silt. LPH seepage observed at approximately 3.8 feet; soil exhibits a petroleum hydrocarbon-like odor. Boring terminated at a depth of approximately 4.0 feet. Gauged fluid at bottom of boring using Colorcut paste; it appeared to be 100% LPH.

BB-7

Gray, moist to wet, gravelly, SAND with some silt and wood debris. Slow water and LPH seepage observed at approximately 1.0 feet; rapid LPH seepage observed below approximately 3.5 feet; soil exhibits a petroleum hydrocarbon-like odor. Boring terminated at a depth of approximately 4.0 feet. Gauged fluid at bottom of boring using Colorcut paste; it appeared to be 100% LPH.

Logged By TJP 5/22/96

Page 1

BB-8

Gray, moist to wet, gravelly SAND with some silt; scattered glass shards. LPH observed on tip of auger at approximately 2.5 feet. Slow seepage observed below approximately 3.8 feet; soil exhibits a petroleum hydrocarbon-like odor. Boring terminated at a depth of approximately 4.0 feet. Gauged fluid at bottom of boring using Colorcut paste approximately one hour after drilling boring; LPH thickness approximately 0.05 feet.

BB-9

Gray, moist to wet, gravelly SAND with some silt. Slow seepage observed at approximately 1.5 feet. Slow seepage observed again below approximately 3.8 feet; soil exhibits a petroleum hydrocarbon-like odor. Boring terminated at a depth of approximately 4.0 feet. Gauged fluid at bottom of boring using Colorcut paste; fluid appears to be a mixture of LPH and water (stains tape black like LPH but changes Colorcut from yellow to red like water).

BB-10

Gray, moist to wet, gravelly SAND with some silt and cobbles. No seepage observed; soil exhibits a petroleum hydrocarbon-like odor. Boring terminated at a depth of approximately 4.0 feet.

BB-11

Gray, moist to wet, gravelly SAND with some silt. No seepage observed in boring but soil and auger tip appears to be saturated with water; no LPH observed. Soil exhibits a petroleum hydrocarbon-like odor. Boring terminated at a depth of approximately 4.0 feet. Boring left open overnight. Fluid level in boring in 5/23/96 was at approximately 3.0 feet. Gauged fluid with Colorcut paste; LPH thickness measured in boring using this method was approximately four inches. Collected two bottles of LPH for potential future laboratory analysis; collected one bag sample of soil for possible sieve analysis.

BB-12

Gray, wet, gravelly SAND with some silt. Rapid seepage observed below approximately 3.0 feet: soil exhibits a petroleum hydrocarbon-like odor. Boring terminated at a depth of approximately 4.0 feet. Seepage accumulated in the boring to a depth of approximately 2.0 feet. Gauged fluid at bottom of boring using Colorcut paste; LPH thickness approximately 0.01 feet. Collected two bottles of LPH for potential future laboratory analysis.

BB-13

Gray, moist, gravelly SAND overlying saturated %-inch minus round rock at approximately 2.0 feet. LPH on tip of auger when removed from the boring. However, boring caved as fast as the auger was removed; consequently, LPH thickness was indeterminate; soil exhibits a petroleum hydrocarbon-like odor. Boring terminated at a depth of approximately 4.0 feet.

RR-74

Gray, moist, gravelly SAND with some silt and scattered metal debris. No seepage observed; soil exhibits a petroleum hydrocarbon-like odor. Boring terminated at a depth of approximately 4.0 feet.

Logged By TJP 5/22/96

Page 2

									<u> </u>
		EXE	LOG (Project No:			Boring No: W-1 Date: 2-23-90
ir	`ocation of I	boring:				Location: Bu Logged by: Installation	lk Termina G. Stuesse	l-Everett,	O Driller: Geotech Drilling Mathod: CMEC-55 Hollow Stem Auger Hole Diameter: 7" Page No: 1 of 1
	,	1		·····	Т "-	-	ı	Г	·
epth (t)	Graphic Log	Blow/ft	Vapor Concen- tration (ppm)	and Depth	Soil Group Symbol (U.S.C.S.)	Water Level	Time:	Date:	Comments:
			(ppm)	ĺ					
0 ~						0-3.0" Aspha	alt		
2 -		4.00		Ring @ 3.0'	Pt	3.0' Organic wood shavings			on, loose, moist, primarily
8 -					ML.	10.0' Silt,	brown, sof	t, wet, wo	od shavings, slight odor.
4 · · · · · · · · · · · · · · · · · · ·					мъ		brown, sof		od shavings, slight s.
4 -	TD=23.0'					i S P	Data: Screen: Blank: Sand: Sentonite: Concrete:		0 0 0

EXPLORATORY BORING Client: American Distributing Co Date: 2-22-90 Location of boring: Client: American Distributing Co Date: 2-22-90 Client: American Distributing Co Date: 2-22-90 Client: American Distributing Co Date: 2-22-90 Dotte: 2-22-90 Client: American Distributing Co Date: 2-22-90 Dotte: Concent Logged by: G. Stuesse Hole Distributing Co Hollow Stem Appear Log Logged by: G. Stuesse Hole Distribution Data: (See Below) Fage No: 1 of 1 Page No: 1 of 1 SW TIP II SW TIP II SW Time: Date: Comments: 11 SO Ring 8 3.0' SW Gravel; degraded asphalt. 3-5" Sand, fine-coarse, grey, loose, very moist, occasional gravel, slight-moderate cily odor, dark brown on outside of sampler. SW Sand, fine-coarse, grey, loose, vet, occasional gravel, slight, moderate oily odor, dark brown on outside of sampler. SW 20.0' Sand, fine-coarse, grey, loose, vet, occasional gravel, slight-medium oily odor, dark brown oily on outside of sampler. SW 20.0' Sand, fine-coarse, grey, loose, vet, occasional gravel, slight-medium oily odor, dark brown oily on outside of sampler. SW 20.0' Sand, fine-coarse, grey, loose, vet, occasional gravel, slight-medium oily odor, dark brown oily on outside of sampler. 21.0' Clay, brown, soft, wet, possible organic, very sorganic odor.	zional m., oily
Client: American Distributing Co Driller: Geotech Location: Bulk Terminal-Everett, Drilling Method: Co Hollow Stem Anger Hole Diameter: 7" Fage No: 1 of 1 Spth Oraphic Log Blow/ft Concentration (ppm)	zional m., oily
Location of boring: Location of boring: Logged by: G. Stuesse Hole Data: (See Below) Fage No: 1 of 1 Spoth Graphic Log Show/ft Concentration (ppm) TIP II So Ring 8 3.0' Sw Sand, fine-coarse, grey, loose, wet, occasional of gravel, slight-medium oily one outside of sampler. Sw Sand, fine-coarse, grey, loose, wet, occasional of gravel, slight-medium oily one outside of sampler. Sw Sold fine coarse, grey, loose, wet, occasional of gravel, slight-medium oily one outside of sampler. Sw Sand, fine-coarse, grey, loose, wet, occasional of gravel, slight-medium oily oder, dark brown on outside of sampler. Sw Sold fine-coarse, grey, loose, wet, occasional of gravel, slight-medium oily oder, dark brown oily on outside of sampler. Sw Sold fine-coarse, grey, loose, wet, occasional of gravel, slight-medium oily oder, dark brown oily on outside of sampler. Sw Sold fine-coarse, grey, loose, wet, occasional of gravel, slight-medium oily oder, dark brown oily on outside of sampler. Sw Sold fine-coarse, grey, loose, wet, occasional of gravel, slight-medium oily oder, dark brown oily on outside of sampler. Sw Sold fine-coarse, grey, loose, wet, occasional of gravel, slight-medium oily oder, dark brown oily on outside of sampler. Sw Sold fine-coarse, grey, loose, wet, occasional of gravel, slight-medium oily oder, dark brown oily on outside of sampler. Sw Sold fine-coarse, grey, loose, wet, occasional of gravel, slight-medium oily oder, dark brown oily on outside of sampler. Sw Sold fine-coarse, grey, loose, wet, occasional of gravel, slight-medium oily oder, dark brown oily on outside of sampler.	zional m., oily
Description	zional m., oily
Logged by: G. Stuesse Hole Diameter: 7" Installation Date: (See Below) Page No: 1 of 1 Page No: 1 of 1 Page No: 1 of 1 Nater Level Time: Date: Comments: The II Comments: The II So Ring 8 1.0' Sw John Sand, fine-coarse, grey, loose, very moist, occasional gravel, slight, moderate oily, odor, dark brown on outside of sampler. Sw John Sand, fine-coarse, grey, loose, wet, occasional gravel, slight-medium oily odor, dark brown on outside of sampler. Sw John Sand, fine-coarse, grey, loose, wet, occasional gravel, slight-medium oily odor, dark brown on outside of sampler. Sw John Sand, fine-coarse, grey, loose, wet, occasional gravel, slight-medium oily odor, dark brown oily on outside of sampler. Sw John Sand, fine coarse, grey, loose, wet, occasional gravel, slight-medium oily odor, dark brown oily on outside of sampler. 20.0' Sand, fine coarse, grey, loose, wet, occasional gravel, slight-medium oily odor, dark brown oily on outside of sampler. 21.0' Clay, brown, soft, wet, possible organic, very sorganic odor.	m, oily
Installation Date: (See Below) Fage No: 1 of 1 Graphic (t) Log Slow/ft Concentration (ppm) O - TIP II	m, oily
Sample type Soil Group Symbol 10	m, oily
Sw Sand, fine-coarse, grey, loose, wet, occasional gravel, slight-medium oily odor, dark brown oily on outside of sampler. Sw Sw Sand, fine-coarse, grey, loose, wet, occasional gravel, slight-medium oily odor, dark brown on outside of sampler. Sw Sw Sand, fine-coarse, grey, loose, wet, occasional gravel, slight-medium oily odor, dark brown on outside of sampler. Sw Sw Sw Sw Sand, fine-coarse, grey, loose, wet, occasional gravel, slight-medium oily odor, dark brown oily on outside of sampler. Sw Sw Sw Sw Sw Sand, fine-coarse, grey, loose, wet, occasional gravel, slight-medium oily odor, dark brown oily on outside of sampler. Sw S	m, oily
tration (ppm) TIP II TIP II	m, oily
(ppm) TIP II TIP II	m, oily
TIP II TIP II O-3" Gravel; degraded asphalt. 3-5" Sand, fine-coarse, grey, loose, very moist, occasional gravel, slight, moderate oily odor, dark brown on outside of sampler. SW 15.0' Sand, fine-coarse, grey, loose, wet, occasional gravel, slight, moderate oily, odor, dark brown on outside of sampler. SW 15.0' Sand, fine-coarse, grey, loose, wet, occasional gravel, slight-medium oily odor, dark brown oily on outside of sampler. SW 20.0' Sand, fine coarse, grey, loose, wet, occasional gravel, slight-medium oily odor, dark brown oily on outside of sampler. 20.0' Sand, fine coarse, gray, loose, wet, occasional gravel, slight-medium oily odor, dark brown oily on outside of sampler. 21.0' Clay, brown, soft, wet, possible organic, very sorganic odor.	m, oily
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gravel, slight-medium oily odor, dark brown oily on putside of sampler. 23.0' Clay, brown, soft, wet, possible organic, very sorganic odor.	
OL on outside of sampler. 23.0' Clay, brown, soft, wet, possible organic, very sorganic odor.	
TD=23.0' Clay, brown, soft, wet, possible organic, very a organic odor.	LIIM
- TD=23.0' organic odor.	
	.l1ght
NOTE: The lower 3.0' of well could not be sand packed	dua ta
heaving sands.	uue co
-	
_	
- Installation Data:	
Blank: 3.0' + 0'	
Sand: 23.0' - 2.0'	
Bentonite: 2.0' - 1.0'	
Congrete: 1.0' - 0'	
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<u>.</u>		EXC	LOG (•		Project No:	05-487-002		Boring No: W-3 Date: 2-22-90
	location of b	ooring:				Client: Ame Location: Bu Logged by: Installation	Driller: Geotech		
epth	Graphic Log	Blow/ft	Vapor Concen- tration (ppm)	and Depth	Soil Group Symbol (U.S.C.S.)	Water Level	Time:	Date:	Comments:
0 - 2 - 4 - 6 -		11		Ring @	SP				dium, grey, loose, moist,
8 -				70.	sp		ight silty nal gravel		lium, grey, loose, wet,
-					SP	occasion	nal gravel,	no oder.	dium, gray, loose, wet,
-	TD=23.0'	***************************************		<u>-</u>		NOTE: Vapors			odor.
						5. B.	creen:		o, ,
-									
-	,								

			LOG O	OF		Project No: 05-487-00	3 .	Boring No: W-4	
		EXF	PLORATORY	/ BORING				Date: 2/22/90	
						_ Client: American Dist	tributin		
	ocation of b	soring:	-			Location: Bulk Termina		Drilling Method:]
						Everett, WA		Hole Diameter: 7"	Ì
						Logged By:			Į
						- · · · · · · · · · · · · · · · · · · ·	7 7 24	Page No: 1 of 1	
						Installation Data: See) Below		Ì
	-		Vapor	I .		water Level Time	Date	Comments:	
pth	1 '	Blow/tt	Concen-	1	1	-		(İ
ft)	Log		tration	4	(D.S.C.S.)	·	1	1	
	1	1	(ppm)				1	l .	
		J				0 +3" Concrets.	1	1	
-		1 7	f '	1		-			
-		4 '	1	1	,				
-		1 1	1 1	1	SM				
- [16	0	Ring @ 4'	1	@ 4' Sand, silty, fine	to medi	ium grained, gray/brown, loose,	
- 🛊		j 1	1 1	1		wet, moderate odor, fil			1
- [1 1	1 1	1	1		****	affir white was stamped to -	İ
-		i)	1 1	1)	1	1			
-		i . J	1 1	1 1	1	1			-
-		<i>i</i>	<i>i</i>	, ,	1 1				
-		,	,	1	1	6 10' Sand, silty, find	e to med	inm grained, gray/brown, loose, we	ent.
- []			<i>i</i>	1	ı J	moderate odor, pieces o	of class	meral and wood.	*-
-		. 1	,	,]	i J	1	/* y=== .	, meent and moore	
- []			.	.	ı j	1			
-		!	.]			I			
1)	414414141				.	A 15/ Clay organic, ht			İ
1							OWN, SU.	ft, wet, pieces of wood, very	
ii.	ATHINIMIN.	1		Ţ	I	slight odor.			
~ 			[1	OL	ı			1
-	\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\				1				
~		1		!	1				
- [.############		1	1			own, sof	ft, wet, pieces of wood, very	
- 11	.[4]44444444]				alight odor.			
-	//////////////////////////////////////	- [1	1				·	
1		[- 1	.					
-	TD=23'	1	[
-	1	.	1		1	Installation Data: Scre	e en	23' - 3'	1
-	Ī		į			Blan	nk	3' - 0	
-	İ		!	1	Ī	Sand	ıd	23' - 2'	
_	1	1	Ì	1				2' - 1'	
-]		Ī		1	•	crete	1' - 0	Į
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	location of t		LOG (Project No: Client: Ame Location: Bu	rican D)istributi:	ng Co.	Boring No: W-5 Date: 2/22/90 Driller:	
ε'		- -				1	erett,	WA		Drilling Method: Hole Diameter: 7" Page No: 1 of 1	
epth	Graphic Log	Blow/ft	Vapor Concen- tration (ppm)	and Depth	1	Water Level	Time	Date	Commen	ita:	
0 - 2 - 4		28	50	Ring @ 3'	SP	moist, slight	ne to m	pieces of	wood and		
6 - 8 - - 2 -						@ 6' Sand, fir	ne to m	edium grai lm of brow	ined, sli	ightly eilty, gray, loose	1,
						wet, slight od 20' Sand, fi	or, [1]	lm of brown	s oil on	ightly silty, gray, loose cuttings. ightly silty, gray, loose brown oil film	
	TD=23'					Installation Da	B B	lank and	23' - 3 3' - 6 23' - 2 2' - 1 1' - 6) !* !*	
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EXPLORATORY BORING Client: American Distributing Co. Driller: Location of boring: Location: Bulk Terminal Drilling Method Everett, WA Hole Diameter:		·		LOG	OF -		Project No:	05-487-	003		Boring No: W-6
epth (ft) Log Blow/ft Concentration (ppm) Symbol (U.S.C.S.) 2 0 - 5' Sand, elightly wilty, fine to medium grained moist, slight odor, some gravel. 19 30 Ring 8 3' SH 6 -	· 	location of b				•	Client: American Distributing Co. Driller: Location: Bulk Terminal Drilling Method: Everett, WA Hole Diameter: 7" Logged By: Page No: 1 of 1				
moist, slight odor, some gravel. 2 -	- 1	1	Blow/ft	Concen- tration	and Depth	Symbol		Time	Date	Commen	its:
4 - TD=23' - Blank 3' - 0 Sand 23' - 2' Bentonite 2' - 1'			19	30	Ring @ 3'		# 6' Sand, sl. # 6' Sand, sl. wet, slight of water and cutt # 10' Sand, ve slight odor, s water and cutt	ightly dor, so tings. ery sil some gr tings.	silty, fin me gravel,	e to me piaces o medium	dium grained, gray, loose, of wood, brown oily film on m grained, gray, loose, wet, ood, brown oily film on
	- 1	I					Installation D	E 5	Blank Band Bentonite	3' - 23' - 2' -	0 2' 1'

Fr 4	location of b		LOG C		c		Project No: 05-487-003 Eoring No: W-7 Client: American Distributing Co. Date: 2/21/90 Location: Bulk Terminal Driller: Geotech Everett, WA Drilling Method: CMEC-55							
							Logged By: G. Stuesse Hollow-Stem Auger Installation Data: Backfill with Hole Diameter: 7" Enviroplus Page No: 1 of 1							
Depth	Graphic Log	Blow/ft	Vapor Concen- tration (ppm)	and I		Soil Group Symbol (U.S.C.S.)	l	Level	Time	Date	Commen	its:		
0	TD=16'	5	TIP!	Ring	@ 3'	SM	@ 3' S wet, g	and, si	lty, fi	ne to coar	se grai	ned, gray to	dark gray, loos	
-														

	OG OF CORY BORING	Project No: 05-487-003 Boring No: W-8 Date: 6/28/90						
`ocation of boring:	, ,,-,	Client: American Distributing Co. Driller: ESE Location: Bulk Terminal Drilling Method: Hand Auguster Averaged By: G. Stuesse Page No: 1 of 1 Installation Data: See Below						
oth Graphic Blow/ft Conc (t) Log trat.	en- and Depth Symbol							
	SM 	0 - 3' Sand, silty, brown, loose, moist to wet, no odor. 0 3' - 10' Silt, gray, soft, wet, slight odor.						
- TD=10'		Installation Data: Screen 10' - 2' Blank 2' - C Sand 10' - 1' Bentonite 1'5' Concrete .5' - 0						

		EX	LOG :	OF Y BORING	<u> </u>	Project No:	05-487	-003	···	Boring No: W-9 Date: 5/28/90	<u></u>
_	location of	boring:				Client: American Distributing Co. Driller: Location: Bulk Terminal Drilling Hethod: Har Everett, WA Sole Diameter: 7* Logged By: Page No: 1 of 1 Installation Data: See Below					d Auger
⊃epth (ft)	Graphic Log	Blow/ft	Vapor Concen- tration (ppm)	and Depth	Soil Group Symbol (U.S.C.S.)	Water Level	Time	Date	Commen	ts:	
0 - 2 - 4 -					ML	0 - 3' Silt, @ 3' - 7.5' S					
8 -	TD=7.5'					Installation		Screen Blank Sand Bentonite Concrete		0 1.0' 0.5'	
-											,
-											
-			778.6								
-											

			LOG		, <u>.</u> , <u>-</u>	Proje	ect No:	05-487	-001		Boring No: W-10		
		EXI	PLORATOR	Y BORING		Client: American Distributing Co. Location: Bulk Terminal Everett, WA							
-	location of b	orina.		_									
	10080100 01 0	oring.									Drilling Method: Hand Auger		
											Hole Diameter: 7"		
							ed By:				Page No: 1 of 1		
						insta	illation	Data:	See Below				
epth	Graphic	Blau (Sa	Vapor Concen-		pe Soil Group	Water	Level	Time	Date	Commen	ts:		
(ft)	Log	310W/IC	tration	, -		<u> </u> -			ļ———				
, ,	209	ļ			(U.S.C.S.)	}		İ					
			(ppm)	ĺ			į	ĺ		}			
0 -				<u> </u>	HIL.			!	!	l			
-					-	0 - 2	' S1It.	hzowa	moint mi	f .	wood and metal, no odor.		
2 -						az,	- 6' Pea	it. hrm	wa, wet, no	odor	wood and metal, no ocor.		
-					ĺ			, 210	,,	. 0401.			
4 -		ļ			₽t								
-		Ì	· [ĺ							
6 -		· [i										
-	TD=6'	İ	ĺ			Instal	lation	Data:	Screen	5.0' -	2.0'		
-	ļ	- 1	}		1				Blank	2.0' -			
- [ł	ļ		1 1				Sand	6.0' -	1.5'		
-	i				1 1				Bentonite	1.5' -	0.5'		
-	}	İ	j]]						İ		
-	1	1	1										
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LOG OF Project No: 05-487-003 Boring No: W-11 EXPLORATORY BORING Date: 5/28/90 Client: American Distributing Co. Driller: ocation of boring: Location: Bulk Terminal Drilling Method: Hand Auger Everett, WA Hole Diameter: 7" Logged By: Page No: 1 of 1 Installation Data: See Below Vapor Sample type Soil Group Water Level Time Date Comments: 3pth Graphic Blow/ft Concenand Depth Symbol 'ft) Log tration (U.S.C.S.) (ppm) 0 - 2' Peat, silty, brown, moist, no odor. Pt @ Z' - 6.5' Peat, brown, wet, brown, oil sheen. Installation Data: Screen 6.5' - 1.5' Blank 1.5' - 0 Sand 5.5' - 1.0' Bentonite 1.0' - 0.5' Concrete 0.5' - 0

	<u> </u>	EX	LOG (OF Y BORING	·	Project No:	Q5 - 467-	-003		Boring No: W-12 Date: 6/28/90
<u></u>	location of 1				<u> </u>	Client: Ame Location: Bu Ev Logged By: Installation	lk Term erett,	minal WA	Driller: Drilling Method: Hand Auger Hole Diameter: 7" Page No: 1 of 1	
epth	Graphic Log	Blow/ft	Vapor Concen- tration (ppm)	and Depth		Water Level	Time	Date	Commen	ts:
2 - 4 - 6 - 6					SM Pt	0 - 3' Sand,				
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						Client: American Distributing Co.				Driller:		
ield location of boring:						Location: Bu	1					
							Location: Bulk Terminal					
						Logged By:	,					
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		EX		Y BORING		Project No:	V3-487	-003		Boring No: W-14 Date: 6/28/90	
			_		<u> </u>	Client: Ame	rican 1	Distributi	ng Co.	Driller:	
	ocation of b	oring:				Location: Bu	lk Ter	minal		Drilling Method: Ba	nd Auger
							erett,	WA		Hole Diameter: 7"	
						Logged By:				Page No: 1 of 1	
						Installation	Data:	See Below			
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		FY	LOG C			Project No:	05-487	-003		Boring No: W-15	
	location of b	_	PLORATOR	! BOKING		Client: Ame Location: Bu Ev Logged By: Installation	ilk Term Ærett,	minal WA	ng Co.	Date: 6/28/90 Driller: Drilling Method: Hole Diameter: 7 Page No: 1 of 1	
epth	Graphic Log	Blow/ft	Vapor t Concen- tration (ppm)	and Depth	Soil Group Symbol (U.S.C.S.)	P Water Level	Time	Date	Comment	51	
0 -					MI.	0 - 7' Silt,	Some sa	and and con	obles, moj	ist to wet, sligh	it odor.
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		EX	LOG (Project No: 05-487-003 Boring No: W-16 Date: 6/28/90 Client: American Distributing Co. Driller:	
	ocation of b	ooring:				Client: American Distributing Co. Driller: Location: Bulk Terminal Drilling Method: Band Auger Everett, WA Hole Diameter: 7" Logged By: Page No: 1 of I Installation Data: See Below	
.h	Graphic Log	Blow/ft	Vapor Concen- tration (ppm)	and Depth	Soil Group Symbol (U.S.C.S.)	Water Level Time Data Comments:	
					MT	O - 6' Silt, some sand and gravel, moist to wet, occasional cobbles, oil on ground water surface.	
	TD=6'					Installation Data: Screen 6' - 2' Blank 2' - 0 Sand 6' - 1' Bentonite I'5' Concrete .5' - 0	
		,					

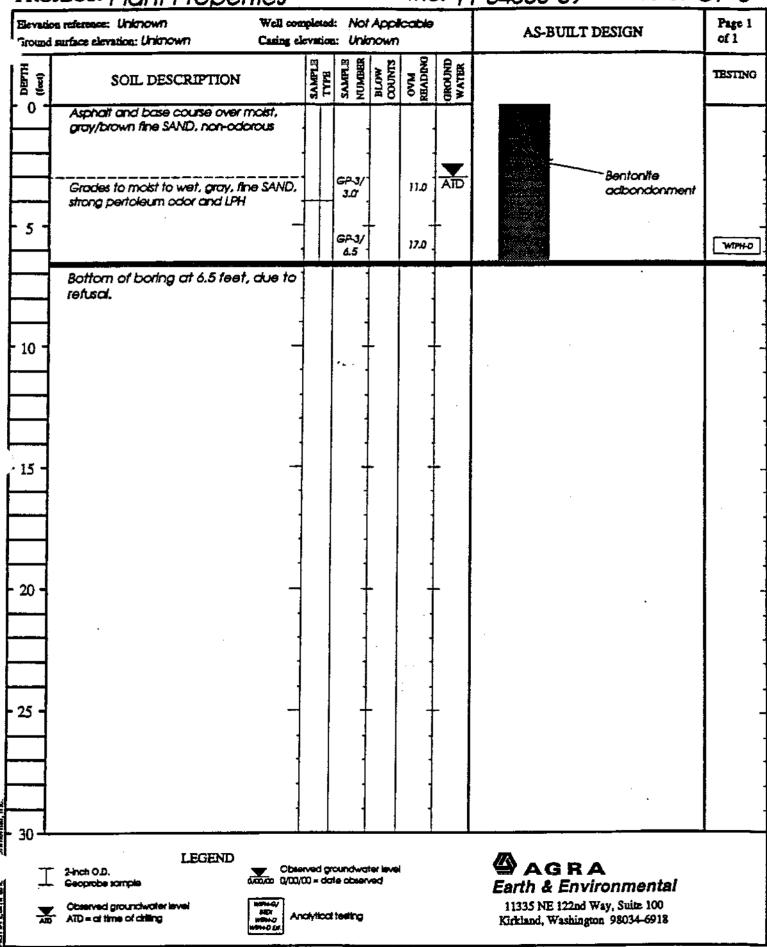
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		EXT	LOG O			Project No:			a Co	Boring No: W-17 Date: 6/29/90 Driller:
7/	ocation of b	ocing:				Location: Bu	lk Term erett,	inal WA	g co.	Drilling Method: Hand Auge: Hole Diameter: 7" Fage No: 1 of 1
Jepth (ft)	Graphic Log	Blow/ft	Vapor Concen- tration (ppm)	and Depth	Soil Group Symbol (U.S.C.S.)	Water Level	Time	Date	Comment	te:
0 -					MI	0 - 6' Silt,				ist to wet, occasional
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W.O. 11-04558-09 WELL NO. GP-1 Plant Properties PROJECT: Elevation reference: Unionown Well completed: 19 March 1996 Page 1 AS-BUILT DESIGN of 1 Ground surface elevation: UnithOWN Casing elevation: Unknown SAMPLE NUMBER BLOW COUNTS SAMPLE OVM READING Derm (od) Flush-mounted TESTING SOIL DESCRIPTION cast iron monument Ground surface 0 Gravel Surfacing over moist, brown, sitty, Top of casing gravely SAND, non-adorous **Asonat** Weathered, red clay brick Bentonite GP-1/ Molst, brown, silty, fine SAND with some 0.0 3.0 Cosina gravel and minor brick fragments (Schedule-80 1-Inch I.D. PVC) 5 Moist to wet, gray, fine to medium SAND. 10-20 sand petroleum odor at 7.0 feet filter pack GP-1/ 8.0 Grades to wet, gray, fine to coarse SAND Screen (3-Inch fine sandy sitt layer at 10.0 feet) (1-Inch I.D. PVC GP-1/ 10 7.0 WIPH D with 10.0 0.028-inch siots) Sto end cap Bottom of boring at 12 feet. 15 20 25 **LEGEND ⇔**agra Observed groundwater level 2-inch O.D. 0/00/00 = date observed Earth & Environmental Geoprobe somble 11335 NE 122nd Way, Suite 100 Observed groundwater level Kirkland, Washington 98034-6918 ATD = at time of drilling Analytical testing

W.O. 11-04558-09 WELL NO. GP-2 Plant Properties PROJECT: Page 1 Well completed: 19 March 1996 Elevation reference: Unionown AS-BUILT DESIGN of 1 Caring elevation: Unknown round purface elevation: Unknown OVM READING Rush-mounted DEPTH (feel) TESTING SOIL DESCRIPTION cast iron monument Ground surface 0 Asphalt and base course over molst. Top of casing gray/brown, sitty, graveity SAND **Asphalt** Moist, gray, fine to coarse SAND with Bentonite some sitt, non-odorous GP-2/ œ 3.5 Casina (Schedule-80 Grades to gray/brown, sity, fine to 1-Inch LD. PVC) medium SAND, non-odorous 5 10-20 sand filter pack 11.0 2-inch fine sandy SLT layer at 7.3 feet GP-2/ 8.0 Grades to saturated, stained black, fine Screen to medium SAND, strong petroleum (1-Inch I.D. PVC odor and LPH globules with 10 0.028-inch slots) GP-2/ Fine SAND interbedded with fine wood 114 W/PH-D 11.0 Slip end cap fragments Bottom of boring at 12 feet. - 15 20 25 **LEGEND ⇔**agra Observed groundwater level 2-inch O.D. troop 0/00/00 = date observed Earth & Environmental **Своргова запря** 11335 NE 122nd Way, Suite 100 Observed groundwater level Analytical teeling Kirkland, Washington 98034-6918 ATD = at time of atting

PROJECT: Plant Properties

W.O. 11-04558-09 WELL NO. GP-3



Mobil Oil/ADC Bulk W.O. 11-04558-09 WELL NO. GP-4 Plant Properties PROJECT: Well completed: 19 March 1996 Page 1 Elevation reference: Unknown AS-BUILT DESIGN of i Casing elevation: Unknown Fround surface elevation: Unknown OVM READING BLOW Rush-mounted DEPTH (foot) TESTING SOIL DESCRIPTION cost iron monument Ground surface 0 Asphalt over base course over Top of casing pray/brown, gravelly, silty SAND. non-adorous Cement **Asphalt** Moist, brown/black/aray, sitty, fine to GP-4/ Cadna 0.0 medium SAND with some gravel, wood 4.0 (Schedule-80 and brick fragments, non-odorous 1-Inch I.D. PVC) 5 Most to wet, gray/brown, fine SAND, GP-4/ WIPHO moderate petroleum odor 7.0 6.0 10-20 sand filter pack Wood debris and LPH GP-4/ 11.0 Screen 8.0 (1-Inch I.D. PVC with 10 Fine grained wood fragments, slight 0.028-inch slots) petroleum staining and odor Slip end cap Bottom of boding at 12 feet. 15 20 25 30 **LEGEND** 🗳 AGRA Observed groundwater lavel 2-Inch O.D. 5000 c/CO/CO = date observed Earth & Environmental Geoprobe sample 11335 NE 122nd Way, Suite 100

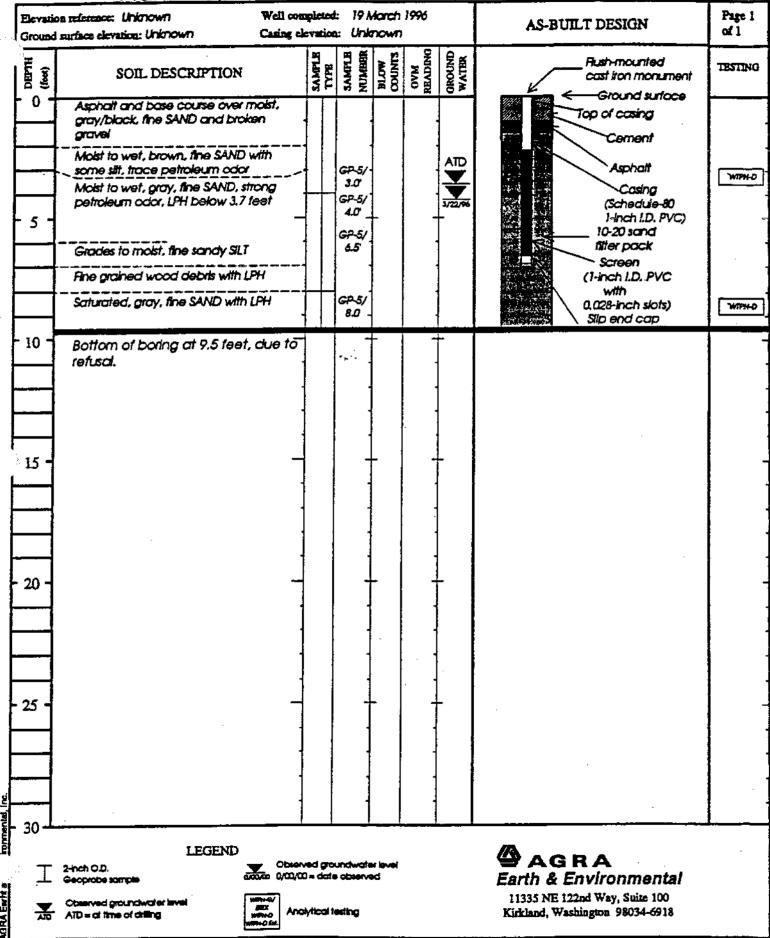
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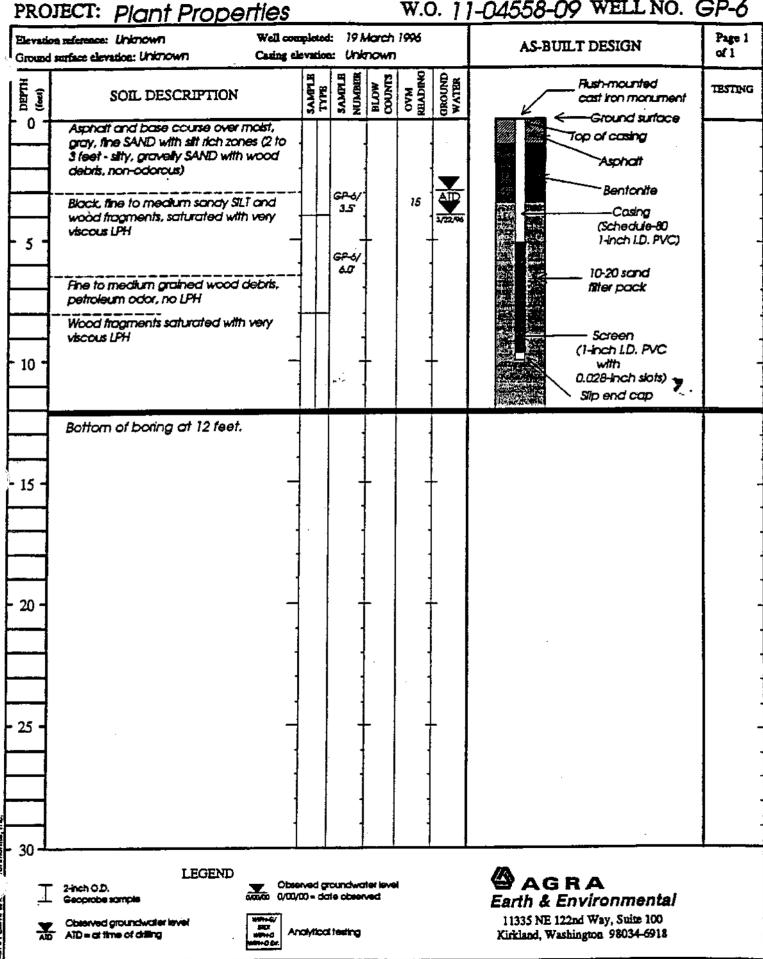
Analytical testing

Kirkland, Washington 98034-6918

Mobil Oll/ADC Bulk
PROJECT: Plant Properties W.O. 11-04558-09 WELL NO. GP-5
Elevation reference: Unknown Well completed: 19 March 1996
Ground surface elevation: Unknown Casing elevation: Unknown R. - BUILT DESIGN of 1



W.O. 11-04558-09 WELL NO. GP-6



W.O. 11-04558-09 WELL NO. GP-7 PROJECT: Plant Properties Elevation reference: Unichown Well completed: Not Applicable Page 1 AS-BUILT DESIGN of 1 Ground surface elevation: Unknown Casing elevation: Unknown SAMPLE NUMBER BLOW COUNTS OVM READING DEPTH (feet) TESTING SOIL DESCRIPTION 0 Asphalt and base course over moist, brown, fine SAND with some sit (5-inch sandy SILT layer at 3.0 feet), non-odorous Bentonite adbondonment X AID 40 Moist, brown, silty, gravelly SAND with wood debris and very viscous LPH WIPH-G/ GP-7/ 5 gracing to fine grained wood debris EFFY 5.5 WIPH-D Est. Bottom of boring at 7.0 feet, due to refusal. 10 15 20 25 LEGEND AGRA Observed groundwater swel 2-inch O.D. Devreede atob = CD/CD\0 co.co.c Geoprobe sample Earth & Environmental Observed groundwater level 11335 NE 122nd Way, Suite 100 Analytical testing ATD = at time of atting Kirkland, Washington 98034-6918

W.O. 11-04558-09 WELLNO. GP-8 PROJECT: Plant Properties Page 1 Well completed: 20 March 1996 Elevation reference: Unknown AS-BUILT DESIGN Ground surface elevation: UnithOwn Caring elevation: Unknown of 1 SAMPLE NUMBER BLOW COUNTS OVM RRADING Flush-mounted TESTING SOIL DESCRIPTION cast iron monument Ground surface 0 Asphalt and base course Top of cosing <u>ದ್ಯಾ/</u> **Asonat** 3.0 Bentonite Minor recovery, moist, dark gray SAND. slight petroleum odor 3/72/90 Casina Moist, black to gray/green, fine sandy (Schedule-80) SILT with wood debris, 1° thick zone of 1-inch I.D. PVC) 5 LPH 10-20 sand GP-8/ filter pack 11 Fine grained wood debris saturated with 9.0 Screen LPH over gray/green SILT WIPH-Q/ (1-inch I.D. PVC EFF with WIPH-D Bo Mionr recovery - sitty, fine SAND over 0.028-inch slots) fine grained wood debris, petroleum odor 10 Stip end cap Bottom of boring at 11 feet. 15 20 25 **LEGEND ⇔**AGRA Observed groundwater level 1-inch O.D. beyveedo etpb = 00/00/0 anana **Geoprobe запрів** Earth & Environmental 11335 NE 122nd Way, Suite 100 Observed groundwater level

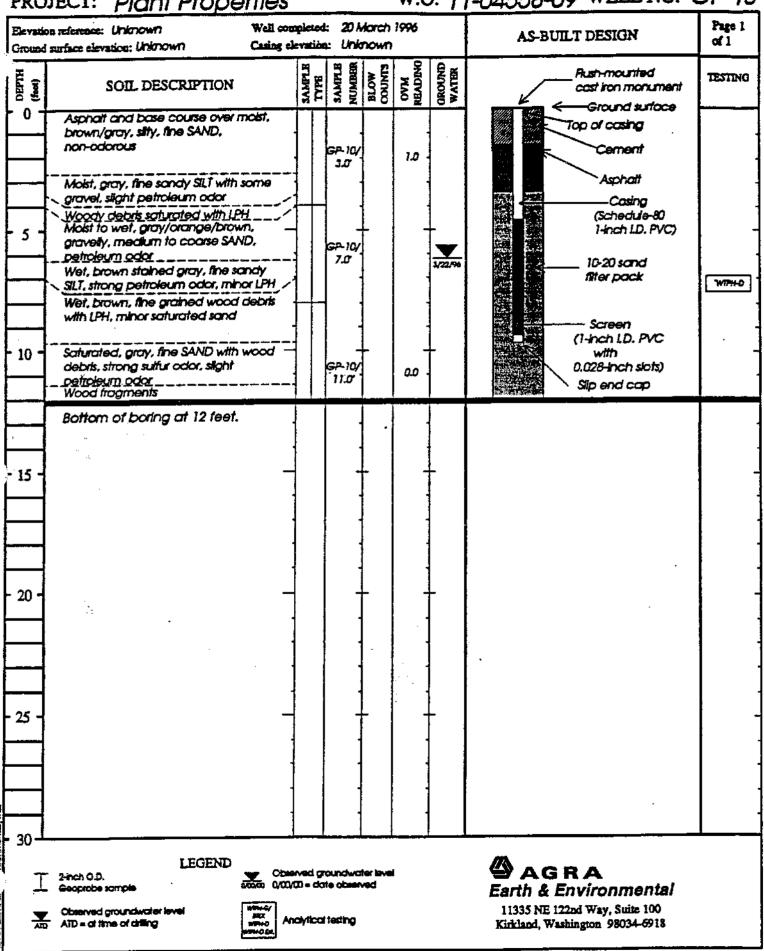
ATD = at time of citting

Analytical testing

Kirkland, Washington 98034-6918

W.O. 11-04558-09 WELL NO. GP-9 Plant Properties PROJECT: Elevation reference: Unknown Well completed: 20 March 1996 Page 1 AS-BUILT DESIGN Casing elevation: Unknown of 1 Ground surface elevation: Unknown BLOW DEPTH (feel) OVM Rush-mounted TESTING SOIL DESCRIPTION cast from monument Ground surface 0 Asphalt and base course Top of casing **Asphall Bentonite** Trace recovery; minor gravel and wood <u>fragments</u> Casina (Schedule-30) 5 1-Inch I.D. PVC) 3/22/No Minor recovery; moist, gray, fine SAND 10-20 sand over minor wood debris and sandy SILT filter pack with gravel, strong petroleum odor WIPH G/ BIFY GP-9/ 3.0 TPH-D B4 8.0 Screen WITHD (1-Inch I.D. PVC 10 0.028-inch slots) Sip end cap No recovery Bottom of boring at 12 feet, 15 20 25 LEGEND **4** AGRA Observed groundwater level 2-inch O.D. arrand 0/00/00 - date observed Geoprobe somple Earth & Environmental 11335 NE 122nd Way, Suite 100 Observed groundwater lievel Analytical testing Kirkland, Washington 98034-6918 ATD = at time of drilling

PROJECT: Plant Properties W.O. 11-04558-09 WELL NO. GP-10

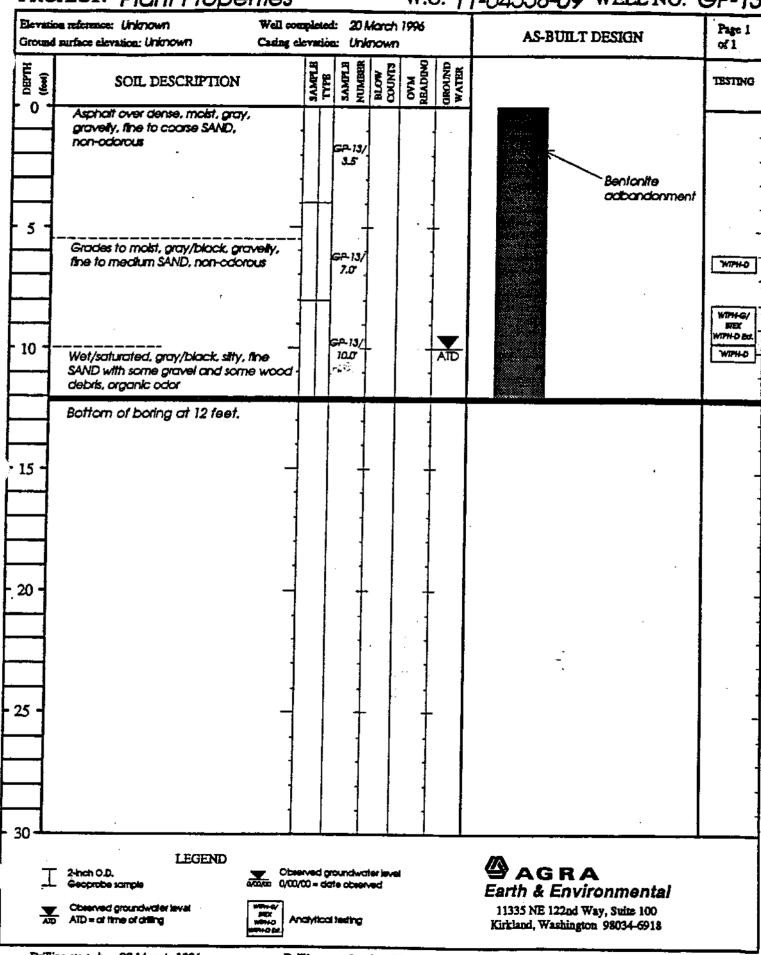


W.O. 11-04558-09 WELL NO. GP-11 PROJECT: Plant Properties Elevation reference: Linknown Well completed: 20 March 1996 Page 1 AS-BUILT DESIGN Casing elevation: Unknown of 1 Ground surface elevation: UNICOWN SAMPLE SAMPLE NUMBER BILOW OVM READING DEPTH (feet) Rush-mounted TESTING SOIL DESCRIPTION cast iron monument Ground surface Ð Asphalt and base course over moist, Top of casing brown, sitty, fine SAND, non-odorous SP-11/ **Asphalt** 40 3.0 Bentonite Moist, gray, sitty, fine SAND with mottling and some shells and wood debits -Casing Moist, tan grading to gray, fine sandy (Schedule-80 SILT with interbedded wood debris, slight 5 1-inch I.D. PVC) petroleum odor at 4.0 feet 45 Wet to saturated, brown, sity, gravely 10-20 sand WIPH-D SAND, strong petroleum odor, minor LPH filter pack WIPH-G/ **EFY** Saturated, black, fine SAND, trace WIPH-D WIPH-D Bd petroleum odor مه 8.0 Screen (1-Inch LD, PVC 10 with 0.028-inch slots) P-11, Silp end cap 120 Bottom of boring at 12 feet. 15 20 25 LEGEND 🗳 agra Observed groundwater level 2-inch O.D. activo 0/00/00 - date observed Geograpie sample Earth & Environmental 11335 NE 122nd Way, Suite 100 Cheerved groundwater level Analytical testing ATD = at time of drilling Kirkland, Washington 98034-6918

W.O. 11-04558-09 WELLNO. GP-12 PROJECT: Plant Properties Elevation reference: Unknown Well completed: 20 March 1996 Page 1 AS-BUILT DESIGN of 1 Casing elevation: Unknown Ground surface elevation: UNICHO SAMPLE NUMBER BLOW COUNTS OVM READING Fush-mounted TESTING SOIL DESCRIPTION cast iron monument Ground surface 0 Asphalt and base course over moist, Top of cosing black, gravelly SAND, slight petroleum odar Cement Moist, gray/brown, fine to coarse SAND grading to brown, fine SAND with some **Aschalt** pravel, non-odorous Casina (Schedule-80 1-inch LD, PVC) 5 10-20 sand 8.0 filter pack Screen (1-inch I.D. PVC) 0.028-inch stats) CP 12/ Wet, gray stained globules black, fine 10.0 10 SAND with gravel, strong petroleum GP 12/ odor and minor LPH globules WIPHO 11.0 Stip end cap GP-12/ Saturated, gray, fine SAND with some 3.2 ט-אימער ט-אימער 12.5 gravel, strong petroleum odor, minor alobules of LPH 15 Bottom of boring at 14 feet. 20 25 **LEGEND** 🗳 AGRA Observed groundwater level 2-inch O.D. 0/00/00 = date observed Earth & Environmental Geoprobe sompts 11335 NE 122nd Way, Suite 100 Observed groundwater level Analytical testing Kirkland, Washington 98034-6918 ATD = at time of drilling

PROJECT: Plant Properties

W.O. 11-04558-09 WELLNO. GP-13



RITTENHOUSE-ZEMAN & A. Geotechnical / Hydrogeological	Consul	INC. tants				NAMI	_			Ever			558-1 1ant	·
SOIL DESCRIPTION	DEPTH (FEET)	LAB TESTS	SAMPLING	GROUND WATER		STAN		▲ B	LOWS	PER	ON F	•		CE
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Loose, wet to saturated, brown-gray, silty fine SAND and fine sandy SILT with a trace of grave! (Fill)			T	又		A		. 						
Very loose to loose, saturated, gray, silty fine to medium SAND with a trace of grayel (Fill)	- -5		Ι								-			
Soft, saturated, brown, silty PEAT Total depth 11½ feet Boring completed 9 March 1988									-			<u>-</u>		
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SOIL DESCRIPTION	DEPTH (FEET)	Lab Tests	SAMPLING	GROUND WATER		STAN		▲ 8	LOW	S PER	FOO	RESIS T		IC
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brown-gray, silty fine SAND and fine sandy SILT with a trace of gravel (Fill)				∇				!						l
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Very loose to loose, saturated, gray, silty fine SAND with a trace of gravel (Fill)			ΙTΙ							-	†	 -	 	†-
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Geotechnical / Hydrogeologic		ltants	_	PAC	JECT T	NAM	Mc	b t l	0il -	Ever	ett (ulk	Plant	
SOIL DESCRIPTION	DEPTH (FEET)	LAB TESTS	SAMPLING	GROUND	5	STAN		A B	NET LOW	S PER	FOO	T		1CE
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MP LING OD SPLIT SPOON SAMPLE	GROUND	WATE	P dz	SEAL			_	LAI	3OR/	TOI	Y T	ESTS		
OD SHELBY SAMPLE 5" ID RING SAMPLE	WATER	LEVEL	∇	DATE				• %	NON	TER C	ONTE			

RITTENIIOUSE-ZEMAN	I & ASSOC., INC.	BOR	ING N	UMBER	W-10			w.o.	W-4	558-1	_
Geotechnical / Hydrogeolo	gical Consultants	PRO	JECT	NAME _M	obil ()i] -	Ever	ett B	ulk P	lant	
SOIL DESCRIPTION Ground Surface Elevation Approximately	DEPTH (FEET) LAB TESTS SAMPLING	GROUND			A B 10 lb. 1	LOWS	PER	FOO	T		CE
	-0	0 2	0	10		20	:	30		40	!
Loose to medium dense, wet to saturated, brown, gravelly, silty, fine to coarse SA a trace to some wood debris (Fill)	ND with	-									
Very loose, saturated, dark brown and gra fine SAND (Fill)	y, silty	-	A						-		
Soft, saturated, brown, silty PEAT	10										
Total depth 11½ feet Boring completed 9 March 1988											
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SALVEL INO	40										
SAMPLING 1 2 OD SPLIT SPOON SAMPLE 1 3 OD SHELBY SAMPLE 2.5 ID RING SAMPLE BULK SAMPLE * SAMPLE NOT RECOVERED	GROUND WATER WATER LEVEL TO ATTIME OF DRILLING ATT	DATE OBSER	VATIO L TIP	ON!	•	% WA	 -N	CONT STIC	ENT JQUID AL W	LIMIT	_

RITTENHOUSE-ZEMAN & ASS Geotechnical / Hydrogeological Co	OC., onsul	INC. tants			RING NUMBER MW-11 W.O. W-4558-I DJECT NAME Mobil Oil - Everett Bulk Plant
SOIL DESCRIPTION Ground Surface Elevation Approximately Feet	DEPTH (FEET)	LAB TESTS	SAMPLING	GHOUND WATER	STANDARD PENETRATION RESISTANCE A BLOWS PER FOOT (140 lb. hammer, 30 inch drop) 0 10 20 30 40 50
Very loose, wet to saturated, gray and brown-gray, silty, fine SAND with a trace of grayel and wood debris (Fill)	-		I	又	
Loose to medium dense, saturated, gray, silty fine SAND with some fine sandy SILT and a trace of gravel (Fill)	-5		I		
Soft, saturated, brown, silty PEAT	-10				
Total depth 11½ feet Boring completed 9 March 1988	-15				
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II 3' OD SHELBY SAMPLE	'ATER I	LEVEL	▽		LABORATORY TESTS * WATER CONTENT NP NON PLASTIC EVATION LI TIP PLASTIC LIMIT CONTENT

WELL TIP

∠ PLASTIC LIMIT.

WELL TIP

NATURAL WATER

CONTENT

PLASTIC LIMIT

HZA

WELL TIP

* SAMPLE NOT RECOVERED

NATURAL WATER

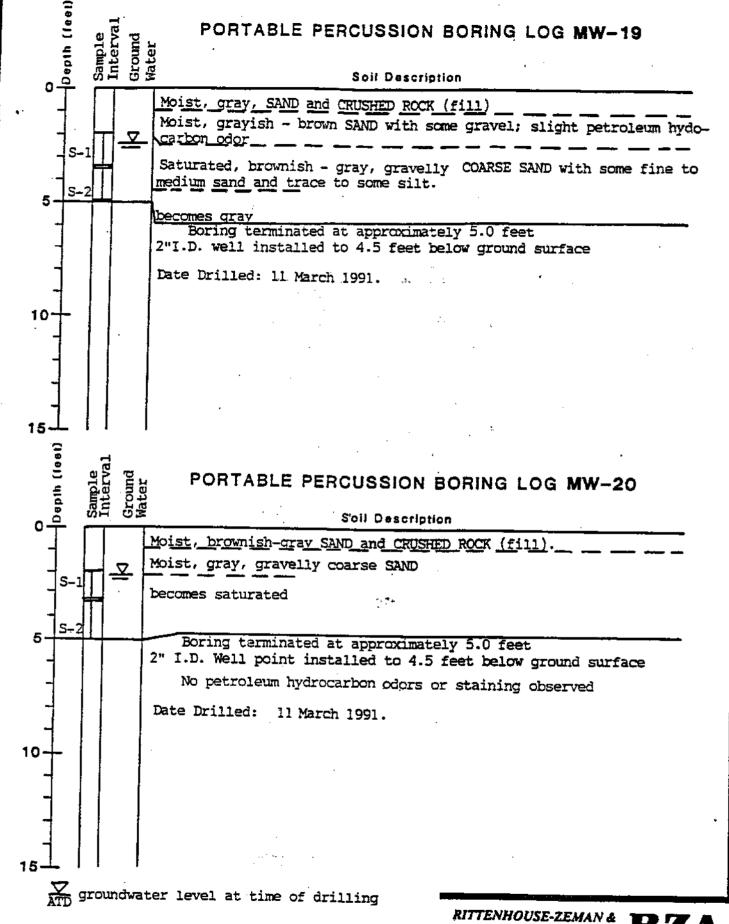
PLASTIC LIMIT

RITTENHOUSE-ZEMAN Geotechnical / Hydrogeolo	'& ASSUC., INC gical Consultant	5			LIMBE			011 -	Fven			1558-1 Plant	
SOIL DESCRIPTION Ground Surface Elevation Approximately	S DEPTH (FEET)	SAMPLING	GROUND		BTAN	IDAR	D PE	NET	RAT S PER er, 30	ON FOO	RESIS T drop	STAN	
Very loose to loose, wet to saturated, da and gray, silty fine SAND with a trace of	rk hrown				1		1	1	1	1	<u> </u>		
and wood debris (Fill)	-		又										
Very loose, saturated, gray, silty, fine swith a trace of gravel (Fill)	5						1	-			-	-	
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oft, saturated, brown, silty PEAT	10						 						
otal depth 11½ feet Oring completed 9 March 1988													
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AMPLING 2' OD SPLIT SPOON SAMPLE 3' OD SHELBY SAMPLE 2.5' ID RING SAMPLE BULK SAMPLE SAMPLE SAMPLE	GROUND WA WATER LEVE AT TIME OF DRILLIN	L 🗸	DATE OBSER	VATIC			• 9	% WA	TER (CONT STIC		LIMIT	

RITTENHOUSE-ZEMAN & Geotechnical / Hydrogeologic	al Cons	ultants			N DAIL		R _ M		011 -	- Ever	-		4558-: Plant	
SOIL DESCRIPTION	TOPOLOGICAL CERTIFICATION CERI	LAB TESTS	SAMPLING	GROUND	s	MAT		📤 Bi	LOW	'RATI S PER er, 30	FOO	T	STAN	CE
Ground Surface Elevation Approximately	- 6	_	ŝ	ੌ ≯	0		10		20	;	30		40	5
loose to medium dense, wet to saturated, bro gray, gravelly, silty SAND with a trace to s wood debris (Fill)		· ——		∇.		A					_			
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Soft, saturated, brown, silty PEAT		0						ļ <u>.</u>		ļ				
Total depth 11% feet Boring completed 9 March 1988		:								ļ				
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SAMPLING	40				į			į						
E 2'00 SPLIT SPOON SAMPLE E 3'00 SHELBY SAMPLE 7 2.5'10 RING SAMPLE	GROUN	D WATI		SEAL DATE				• 9	6 WA	ATOP TER C	ОИТ		3	
	AT TIME OF	DRILLING	- 	OBSER WEL	VATIC L TIP	Ν	2	PLAST	•	— N.	— Li	L WA	LIMIT TÉR	

Geotechnical / Hydrogeolog	gical Con	C., sul	INC. tants				UMBE NAME			_	- Eve		D. <u>W-</u> Bulk	. –	
SOIL DESCRIPTION Ground Surface Elevation Approximately	Fæst	DEPTH (FEET)	LAB TESTS	SAMPLING	GROUND WATER			(140	▲ B	LOW	S PE	R FOC	RESI OT of drop		ICE
Loose to medium dense, wet to saturated, I	1 001	-0 ■		1 0,		0	1	0		20		30	مسند	40	
gray to gray, silty, fine to medium SAND trace of gravel (Fill) Very loose, saturated, gray, silty, fine to SAND with trace of gravel, wood debris and organics (Fill)	with a	. 5		I	又										
Soft, saturated, brown, silty PEAT	· 	10													
Total depth 11½ feet Boring completed 10 March 1988		15										-			
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AMPLING 2° OD SPLIT SPOON SAMPLE 3° OD SHELBY SAMPLE 2.5° ID RING SAMPLE JULK SAMPLE	GROUI WATE AT TIME OF	ER L	.EVEL		SEAL DATE OBSERV	/ATIO	- 		• 9	WA	TER (CONT STIC	ENT		
SAMPLE NOT RECOVERED		٠.,			METI	- TIP	14	2,	r PLAST		—- N. С		AL WA		

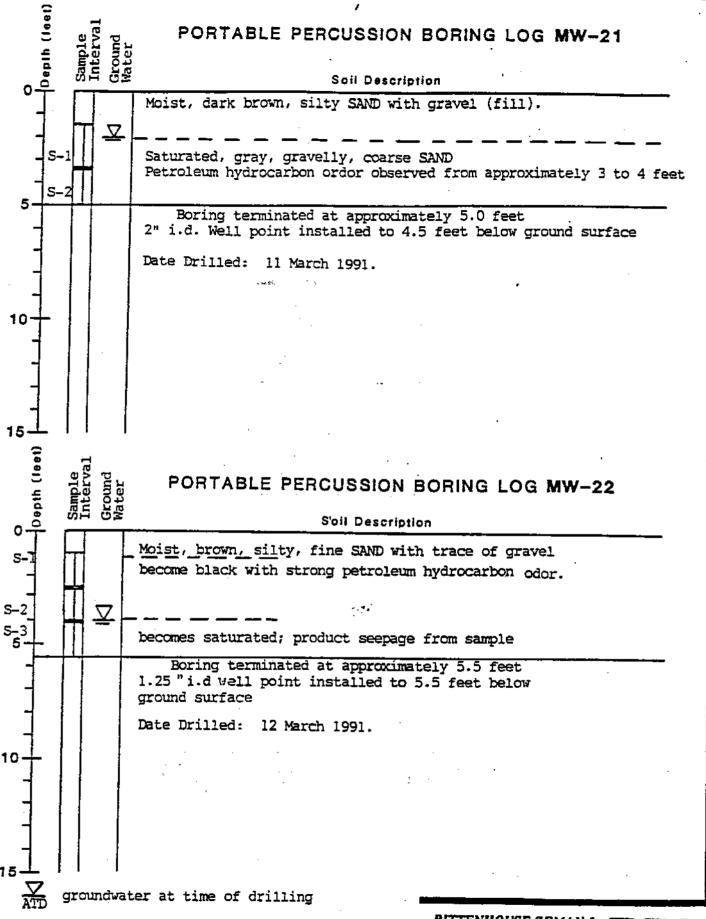
RITTENHOUSE-ZEMAN Geotechnical / Hydrogeolog	ING NUMBER MW-18 W.O. W-4558-1 JECT NAME Mobil Oil - Everett Bulk Plant													
SOIL DESCRIPTION	DEPTH (FEET) LAB TESTS	SAMPLING	GROUND	STANDARD PENETRATION RESISTANCE A BLOWS PER FOOT (140 lb. hammer, 30 inch drop)										
Ground Surface Elevation Approximately	1.061	~ <u>~</u> ~	တ်	5 ≯	0	1	10		20		30		40	50
Loose to medium dense, wet to saturated, d to black, gravelly, silty, fine SAND (Fill	lark brown)	-	\overline{H}	\sqrt{Z}				_						
toose, saturated, gray, silty, fine to med with a trace to some gravel and wood debri	ium SAND s (Fill)	- 5												
Soft, saturated, brown, silty PEAT	[10												
Total depth 11½ feet Boring completed 10 March 1988		15												
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SAMPLING I 2' OD SPLIT SPOON SAMPLE II 3' OD SHELBY SAMPLE 2.5' ID RING SAMPLE ULK SAMPLE	GROU	ND WAT	\neg	SEAL DATE OBSERV	. ! /ATIO	i N		• 9	WAT		ONTE STIC — LI	ENT QUIÐ	LIMIT	
* SAMPLE NOT RECOVERED		•• : •	. [WELL		=	<u></u>	LAST	 اان ۱۵	CC	ATURA ONTE	IL WA	TER	



RITTENHOUSE-ZEMAN & ASSOCIATES, INC.
Geotechnical Consultants

1400 140th N.E. Bellevne, Washington \$6007 (206) 746-8020

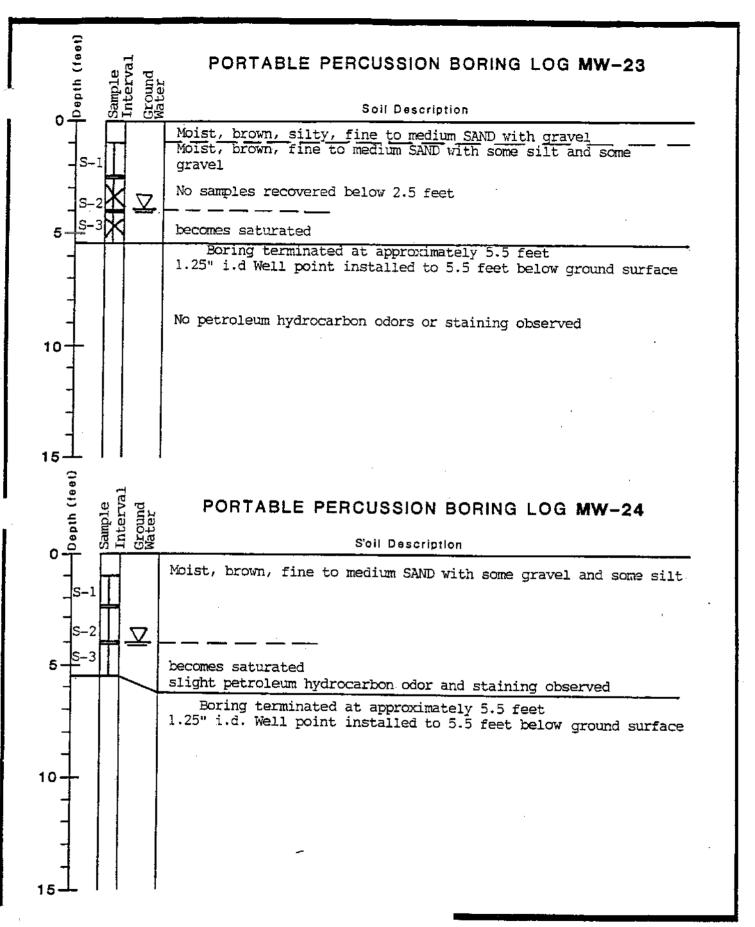




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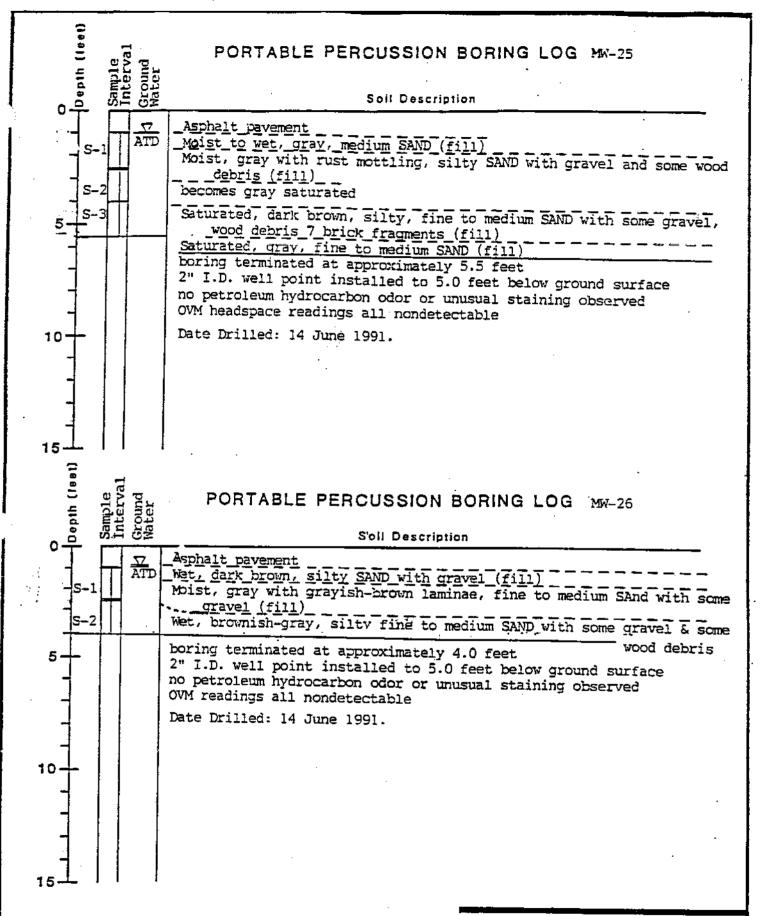




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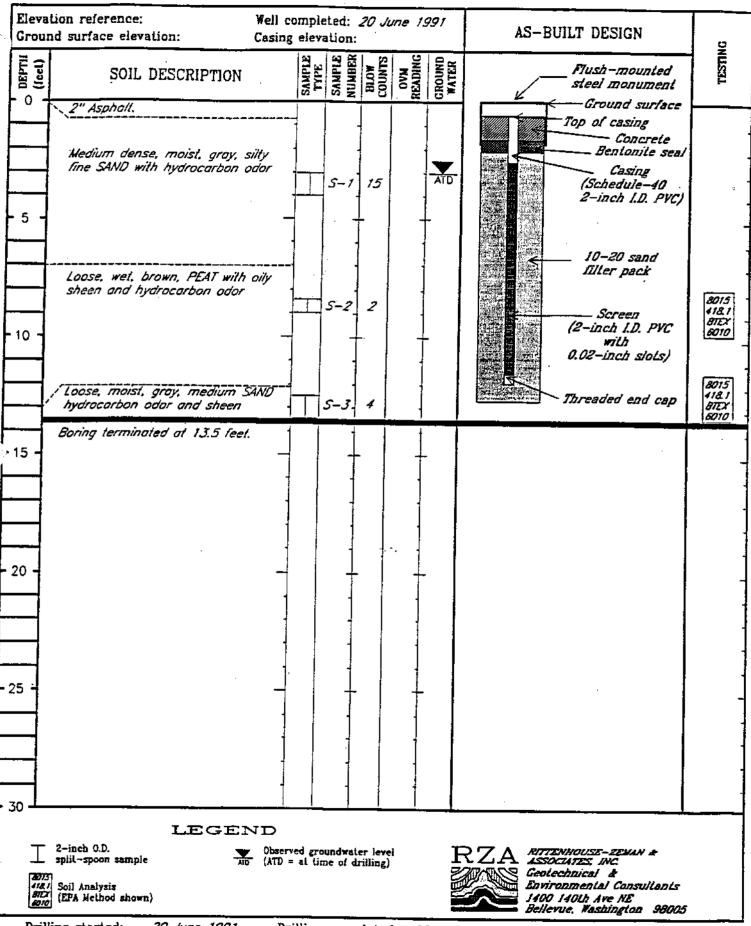




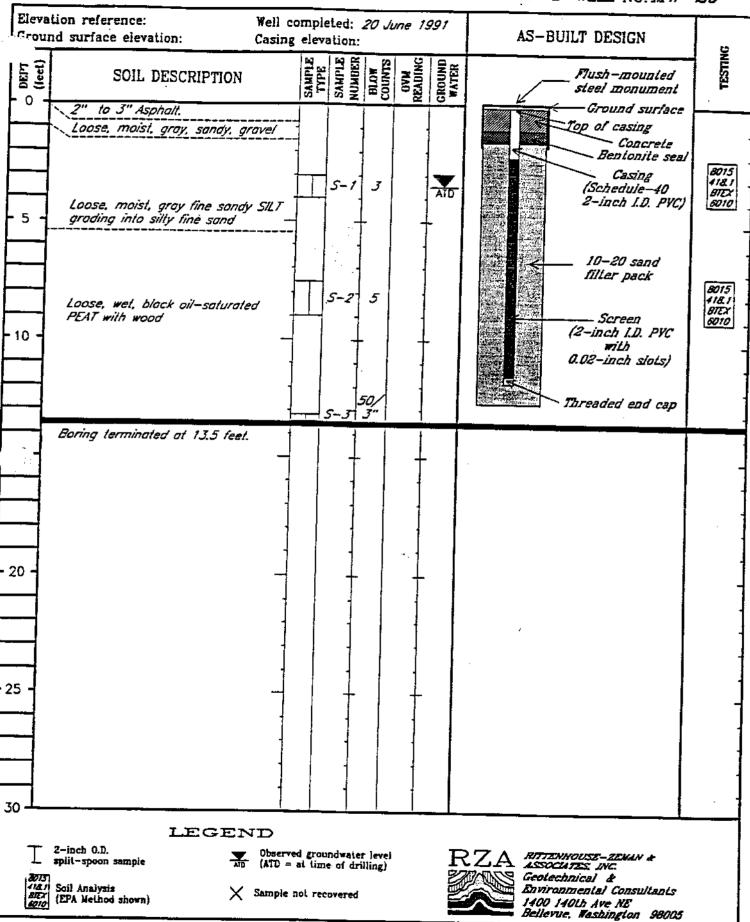
▼ ATD groundwater level at time of drilling

RITTENHOUSE-ZEMAN & ASSOCIATES, INC.
Geotechnical Consultants
1400 140th N.E.
Bellevue, Washington 98007
(206) 7-16-8020





	ion reference:	Well co	mpl	eted:	20 J	une 1.	991	AS DINE DEGICAL
(feet)	d surface elevation: SOIL DESCRIPTION	Casing	SAMPLE TYPE			OVM READING	GROUND	AS-BUILT DESIGN Flush-mounted
0 +			器드	SA D	ਛੋੜ	25	GRO **	Jest monument
	2" Asphalt. 3 inches brown/gray sandy	GRAVEL					1	Top of casing Concrete Bentonite seal
	Loose, moist, gray silly line	= SANO		5-1	2		ATD	Casing (Schedule-40 2-inch I.D. PVC)
5	Loose, moist, brown, PEAT /	-		_	_	_	-	10–20 sand
	strong hydrocarbon odor	oyes.		5-2	2			filler pack Screen
) 	·	_			-	1	-	(2-inch I.D. PVC with 0.02-inch slots)
	Loose, moist to wet, brown, medium SAND with organics moderate hydrocarbon odor	(peat);	$ $ $ $	S-3.	2			Threaded end cap
	Boring terminated at 13.5 fee	et.		†				
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⊥ 5 [8075] *18.7] S	mid maan asaa la	Cbserve	d grou al tim	Undwate le of dr	r leve illing)	I		RZA ASSOCIATES, INC. Geolechnical & Environmental Consultants 1400 140th Ave NE
	ng started: 20 June 1991					: 20		Bellevue, Washington 98005



	tion reference:	Well com	ple	ted: .	20 JU	ine 19	991	AS-BUILT DESIGN
(leet)	SOIL DESCRIPTION	Casing el			BLOW	DVM	GROUND	Flush-mounted steel monument
	2" Asphalt. Loose, moist, gray, silty SAM	0						Ground surface Top of casing Concrete Bentonite seal
	Loose, moist, gray, silty fine	SAND	K	S-1	5		AÎD	Casing (Schedule-40 2-inch I.D. PVC)
5	Loose, black, oily wood and i	PEAT		·]	-	1	_	10-20 sand
-	Very loose, wet, oily, gray me SAND with organics (wood and	dium		5-2	2			filler pack ### ### ### ### ### ### ###
10	SAINE WITH ORGANICS (WOOD ONE	peur)		1	.	-	-	(2-inch I.D. PYC with 0.02-inch slots)
	Loose, wet (oily), black/brown and wood	1 1	-	5-3	8			Threaded end cap
5 -	Boring terminated at 13.5 feet	-		+	.	+		
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-	LEGEI	• Observed	grou	ındwalı	er l ev e	1	F	RZA RITTENHOUSE-ZEMAN &
8015 118.1 877	Soil Analysis		tim	e of di	rilling)			ASSOCIATES, INC. Geotechnical & Environmental Consultants 1400 140th Ave NE

PROJECT: Everett Mobil Bulk Plant W.O. 11-04558-04 WELL NO. MW-3 Elevation reference: 100.00 feet Well completed: 07 December 1993 Ground surface elevation: Unknown Page 1 AS-BUILT DESIGN Casing elevation: 98.58 feet of I DEPTH (feet) SAMPLE NUMBER BLOW COUNTS SAMPLE TYPE OVM READING SOIL DESCRIPTION Flush-mounted TESTIN steel monument 0 Ground surface Asphattic Concrete Top of casing Cement Medium dense, wet, brownish-gray, fine SAND with gravel (Fill). Slight pertoleum-S-1 Bentonite 25 5 like odor observed Casina 5 (Schedule-40 2-inch I.D. PVC) 10-20 sand 12/8/93 filter pack Loose, wet to saturated, dark greenishgray, SAND with some gravel and wood S-2 6 5 debris (Fili) Screen 10 (2-inch I.D. PVC with 0.010-inch slots) Medium dense, saturated, dark gray, medium SAND with wood debris S-3 22 Riveted slip cap 5 15 Bottom of boring at 15 feet. 20 25 30 LEGEND RZA AGRA, Inc. 2-inch O.D. Geotechnical & Environmental Group split-spoon sample Observed groundwater level Devreed etab = 00/00/0 animo 11335 NE 122nd Way, Suite 100 Kirkland, Washington 98034-6918 Drilling started: 07 December 1993 Drilling completed: 07 December 1993 Logged by:

TJP

PROJECT: Everett Mobil Bulk Plant W.O. 11-04558-04 WELL NO. MW-32 Elevation reference: 100.00 feet Well completed: 07 December 1993 Page 1 Ground surface elevation: Unknown AS-BUILT DESIGN Casing elevation: 99,17 feet of 1 SAMPLE TYPE OVM READING DEPTH (feet) BLOW COUNTS GROUND WATER SOIL DESCRIPTION Flush-mounted TESTING steel monument 0 Ground surface Gravel surface Top of casing Cement Mediun dense, wet to saturated. 12/8/93 Bentonite greenish-gray, gravelly, medium SAND S-1 13 5 · Casing (Schedule-40 5 2-Inch-I.D. PVC) 10-20 sand filter pack Medium dense, saturated, grayish-dark brown, medium SAND with gravel, some 5-2 17 5 silt and wood fragments Screen 10 (2-inch I.D. PVC with 0.010-inch slots) Medium dense, saturated, gravish-dark brown, sitty, fine to medium \$AND with S-3 17 5 Riveted slip cap some gravel and wood fragments 15 Bottom of boring at 15 feet. No unusual staining or petroleumlike odors observed. 20 25 30

LEGEND

2-inch O.D. eigmos noogs-filgs

RZA AGRA, Inc. Geotechnical & Environmental Group

Observed groundwater level Observed group warrier a

I 1335 NE 122nd Way, Suite 100 Kirkland, Washington 98034-6918

PROJECT: Everett Mobil Bulk Plant W.O. 11-04558-04 WELL NO. MW-35 Elevation reference: 100.00 feet Well completed: 07 December 1993 Ground surface elevation: Unknown Casing elevation: 97,64 feet Page 1 AS-BUILT DESIGN of 1 DEPTH (feet) SAMPLE TYPE SAMPLE NUMBER BLOW COUNTS OVM READING GROUND WATER SOIL DESCRIPTION Flush-mounted TESTING steel monument 0 Asphaltic Concrete Ground surface Top of casina Cement Medium dense, wet to saturated, gray, medium to coarse SAND with some S-1 Bentonite 21 5 gravel (Fill) Casing 5 (Schedule-40 Medium dense, saturated, greenish-gray, 2-inch I.D. PVC) silty, fine to medium SAND (Fill) S-2 11 5 10-20 sand filter pack Loose, saturated, brown, sitty PEAT S-3 5 5 Screen 10 Loose to medium dense, saturated, gray (2-inch I.D. PVC to brownish-gray, SAND with trace to with S-4 8 5 0.010-inch slots) some silt, gravel and wood fragments (Chunk of wood stuck in sample tube; S-5. blow count probably not representative) 50/ S-5 5 Riveted slip cap 15 S-6 11 5 S-7 5 20 S-8 10 5 Native soil backfill (caved) 17 5 25 S-10 | 14 5 Very stiff, saturated, brown, clayey SILT with organics (PEAT-Like) S-11 17 5 Bottom of boring at 29 feet. 30 No unusual staining or petroleumlike adors observed.

RZA AGRA, Inc. LEGEND Geotechnical & Environmental Group Observed groundwater level 0/00/00 = date observed 11335 NE 122nd Way, Suite 100 spilit-spoon sample Kirkland, Washington 98034-6918

Drilling started:

2-inch Q.D.

07 December 1993

Drilling completed:

07 December 1993

Logged by:

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PROJECT: Everett Mobil Bulk Plant W.O. 11-04558-04 WELL NO. MW-35 Elevation reference: 100.00 feet Well completed: 06 December 1993 Page 1 Ground surface elevation: Unknown AS-BUILT DESIGN Casing elevation: 103.96 feet of 1 SAMPLE TYPE SAMPLE NUMBER OVM READING DEPTH (feat) BLOW GROUND WATTER SOIL DESCRIPTION Flush-mounted TESTING steel monument 0 Ground surface Top of casing Cement Dense, moist, gray, sitty, fine to medium Bentonite SAND with some gravel S-1 38 0 Casing (Schedule-40 5 2-inch I.D. PVC) 12/8/93 10-20 sand filter pack Loose, moist to saturated, gray, fine sandy SiLT with some gravel S-2 0 Screen 10 (2-inch I.D. PVC with 0.010-inch slots) S-3 4 Ò Riveted slip cap 15 Bottom of boring at 15 feet. Field FT-IR analysis of samples S-1 and S-2 Indicated TPH concentrations of <50 ppm. 20 25 30 LEGEND RZA AGRA, Inc.
Geotechnical & Environmental Group 2-inch Q.D. split-spoon sample Observed groundwater level 0/00/00 = date observed 11335 NE 122nd Way, Suite 100 Kirkland, Washington 98034-6918

Drilling started:

06 December 1993

Drilling completed:

06 December 1993

Logged by:

GKS

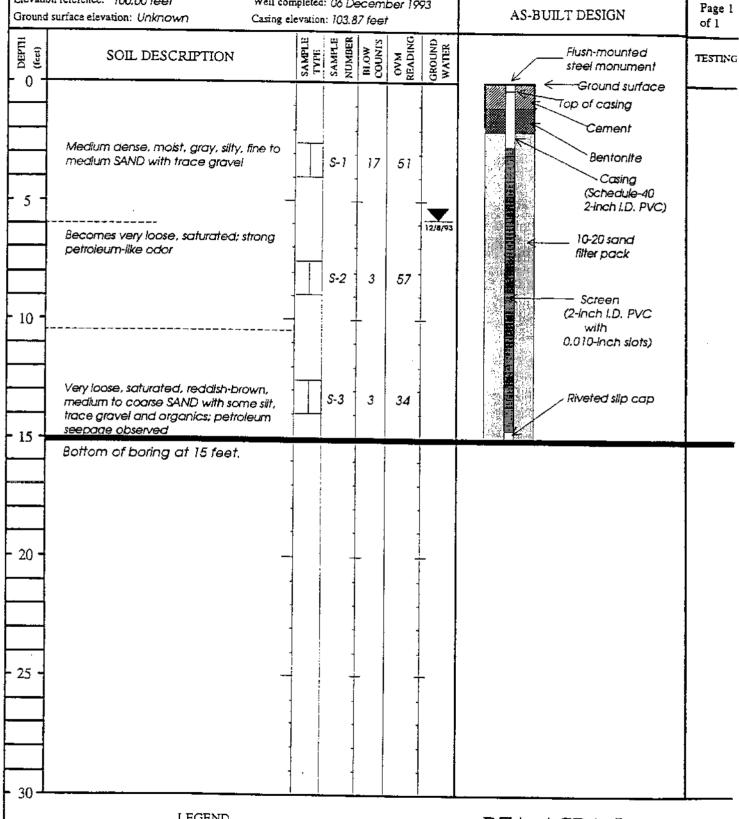
PROJECT: Everett Mobil Bulk Plant W.O. 11-04558-04 WELL NO. MW-36 Elevation reference: 100.00 feet Well completed: 06 December 1993 Page 1 Ground surface elevation: Unknown AS-BUILT DESIGN Casing elevation: 99,91 feet of 1 SAMPLE TYPE SAMPLE NUMBER BLOW COUNTS DEPTH (feet) OVM READING GROUND Flush-mounted SOIL DESCRIPTION TESTING steel monument 0 Ground surface Top of casing Cement Medium dense, moist, blacksh-gray, silty, 12/8/93 Bentonite fine to medium SAND with some gravel S-1 19 0 Casing (Schedule-40 5 2-inch I.D. PVC) Becomes very loose, with increasing silt content 10-20 sand filter pack S-2 2 0 Screen (2-Inch I.D. PVC 10 with 0.010-inch slots) Wood debris 5-3 4 0 Riveted slip cap 15 Bottom of boring at 15 feet. 20 25 30 LEGEND RZA AGRA, Inc. 2-inch O.D.

split-spoon sample

Observed groundwater level omora 0/00/00 = date observed

Geotechnical & Environmental Group

11335 NE 122nd Way, Suite 100 Kirkland, Washington 98034-6918



LEGEND

2-inch O.D. split-spoon sample

Observed groundwater level 0,00,00 0/00/00 = date observed

RZA AGRA, Inc.
Geotechnical & Environmental Group

11335 NE 122nd Way, Suite 100 Kirkland, Washington 98034-6918

Mobil/ADC W.O. 11-04558-09 WELL NO.MW-38 on reference: Unknown Well completed: 05 June 1996 Page 1 AS-BUILT DESIGN and surface elevation: Unknown Casing elevation: Unknown of 1 BLOW COUNTS OVM READING GROUND DEFIN SAMPLE TYPE (geel) 2° above ground SOIL DESCRIPTION TESTING steel monument 0 Top of casing Grass and Roots Loose, moist, dark brown, sitty SAND with. Ground surface gravel (strong petroleum hydrocarbon-like odor) MW-38, 2.5 Bentonite Casing (Schedule-40 5 2-inch I.D. PVC) MW-38. 10 0.0 5.0 ATD 10-20 sand filter pack MW-38/ 50/ 0.0 7.5 Screen (2-inch I.D. PVC) with Medium dense, saturated, brown WOOD 10 0.02-inch slots) CHIPS with trace silt (Fill) (strong WW-38/ 11 aoThreaded end cap petroleum hydrocarbon-like odor) 10.0 Bottom of boring at 12.5 feet. 15 20 25 30 **LEGEND △**AGRA 2-inch O.D. Observed groundwater level eigrape nooge-fiice ATD = at time of skilling Earth & Environmental 11335 NE 122nd Way, Suite 100 Grob sample Kirkland, Washington 98034-6918

Drilling started: 05 June 1996

Drilling completed: 05 June 1996

Logged by: RAL

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AGRA Earth & Environmental

SHEE!	
TOTAL DEPTH	<u> </u>
DATE BEGUN 6	
DATE COMPLETED	4/3/16

		DATE BEGUN 6/5/76	
EATHER	portly cloudy,	TEST BORING LOG DATE COMPLETED 9/5/1	5
	MPLING OFFICE OF	GROUNDWATER TABLE FREIT NAME MOBIL/ 10C. ATD ATTOM OF THE ABOUT AS INTO A SUT IN MEET 11-04558-09 T17 DEST-MISSEL 6.7 OF MISSELS BALC THE 0430 MISSELS MISSEL CASCADE DATE 6/5/46 MISSELS MISA EAVELNO MISSELS MISA EAVELNO MISSELS FLETTELTION TEST TITUES RERING D & MISA	
•		SOIL DESCRIPTION	
	·	GRASS AND ROOTS OVER BACKFILL BENTINGS TO APPROX. 5.6 Reat	
	2	_	
	1		
		m dense, saturated, dark brann silty SAND with GARVEL (5m) - was clabris, free product (oil), strong ail. No sample for remains	
trw-1 7.5	8 II Pt.	stiff, moist-salusted, brown PEAT - trace sict, strong oder HAV	=14/7
(0.0	12 J 5P	m. dense, saturated, grey brown SAND with sict (SP) - trace product debris from 10-10.5 feet, strong ador.	ux,
\\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \\	6 T Pt 3-	Stiff, sulvested, bunn PEAT-trace silt, strong oder HNV = 5 ppr	-
		DRILL OUT TO 15' MENVING SANO 0.5 THREADED CAP.	
	7 7 7 7 7 7 7 7 -		
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		140 16 - 30" Drop	
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	DG MARY		

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MONITORING WELL AS-BUILT REPORT

•		PROJECT No. 11-04558-09
L ^z "ATION		PROJECT NAME MOBIL / TO
	BY PAC	BORING/WELL I.D. VRW-1
	STALLER CASCADE	DATE 6/5/95
	•	•
SOIL TYPE		
		-BOVE GROUND RESERVEIGHT (IF APPLICABLE)
	+2.0	MONUMENT TYPE IF APPLICABLE)
	72.0	WELL CAP TYPE locking
		_
		GROUT FFE/=SACKS
	o sorface	
		BENTONITE SEAL /=SACKS
		BENTONITE BEACH SACKS
		WELL CASING LD. 4"
		TYPE OF CASING Schole 40 PUC
	9	TYPE OF CONNECTION Thread-d
	-	_
	· 	FILTER PACK/SIZE/#SACKS_6712
	<u></u>	
		11.11
		WELL SCREEN I.D. 4"
	<u> </u>	TYPE OF SCREEN "V" Screen
		SLOT SIZE 0.030
	·	
		DIAMETER OF BOREHOLE 12"
_		
	14.0 145	ENDCAPTYPE threaded (0.5' points)
	•	LADOM THE TREESE COMMENTAL PERSONS
<u> </u>	14.5	(O)
REMARKS		

Z	12:	20	SAGRA	HOLE NO 1864-1 SHEET 1 OF 1 TOTAL OEPT- 1500
	THEE 06	rtly cloudy,	Earth & Environmental TEST BORING LOG	0416 85001. 6/5/96 DATE COMPLETE: 9/5/96
· · · · · · · · · · · · · · · · · · ·	SAMPL		GROUNDWATER TABLE - PROJECT NAME Md	BIL/40C 1-04558-09 TI7
ENTER CALL	HEROELA WW	PHESAMINI PROTEIN	DEPTH IN FEET 6.7 SECURGET ENGINEER THM: 0430 DRILLING CONTACTOR CRE DATE 6/5/46 METHOD USED HISM	::, C有5CAPE
- 13	<u> </u>	2	SAMARUNU METHOO I SPT=STAMBARD PENETRATION TEST	
			SOIL DESCRIPTION GPASS AND ADDTS OVER BACKFILL BENTHING TO APPROX. 518 Rect	
		/		· ·
			m dense, saturated, dark brown silky samp clebris, free product (011), strong	••• •• •• •• •• •• •• •• •• •• •• •• ••
, l	14-1 8 1.5 4 6	II Pt	stiff, montraturated, brown PEAT - trace sic	Lt, strong odor HNU=14pp
VQ 74	2w-1 12 0.0 11	II 30	m. dense, saturated, gray brown SAND with wood debris from 10-10.5	in sict(SP) - trace prot, feet, strong odor.
ν V 73	RW1 6 25 6	I Pt	Stiff, suturated, brown PEAT-trace sict, stre HAU =	rg odor
			DRILL OUT TO 15' MEAVING SAND 0.5 THREADED CAP.	
		-		
		:		•

140 16 - 30" Drop

BORING LOG SUMMARY



	AC	3 R	Α		
Ear	th &	Env	riron	imen	ital

MONITORING WELL AS-BUILT REPORT

			-		PROJECT No. /1-04558-09
LOUATION	.,				PROJECT NAME MOBIL / ACC
OBSERVED E	3Y	BYL		-	·
DRILLER/INS	STALLER	CASCI	FOE		DATE 6/5/46
SOIL TYPE	DEPTH	,			
	+2.0				ABOTE GROUND RESERVEIGHT (IF APPLICABLE) MONUMENT TYPE IF APPLICABLE) WELL CAP TYPE
	0 10	rface [GROUTIFFE/=SACKS
	t				BENTONITE SEAL - = SACKS
, 1					WELL CASING I.D. 4"
					TYPE OF CASING Schoolule 40 PUC
	2-				TYPE OF CONNECTION Thread-d
					FILTER PACK/SIZE (=SACKS & 12
					WELL SCREEN I.D. 4" TYPE OF SCREEN "V" SCREEN SLOT SIZE 0.030
				Control of the second	BIAMETER OF BOREHOLE 12"
	140 145 145				ENDCAPTYPE threaded (0.51 points)
REMARKS		-			

		, .	rcc	OF		Project No:	05-487-	-001		Boring No: AD-01
		EX	PLORATOR	Y BORING						Date: 1-15-90
_						_Client: Ame	rican E)iatributir	ia Co.	Driller: D. Alford
1	location of h	boring:								Drilling Method: Hand Auger
										Hole Diameter: 2"
						Logged by:				Page No: 1 of 1
						Installation	Data:	Backfill w	ith envi	roplug
			Vapor		Soil Group	Water Lavel	Time	Date	Commen	TS:
epth	Graphic	Blow/ft	Concen-	and Depth	Symbol		!	ļ <u>.</u>		
(ft)	Log		Cration) f	(U.S.C.S.)	1				
	1		(bbm)			3.0'				
0 -		-		Sample @		Grass		l	!	
_		-]	1	0.5-1.0	sp	1	- coar	sa arainnd		onal gravel, very slight clay
1 -	72750503311777	-	İ			loose, moist,			, occasio	onal gravel, very slight clay
-	<i>Gillightille</i>			1		10000,	,,, ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,			
2 -		[[ac ac	2.0' Sand, c	lavey,	fine grain	ed. arev	p brown, loose, very moist,
- 1		ŀ						leum odor.		
3 -			!	Sample @						el, light grey brown, very
-	TD = 3.0'			3.01				, strong p		
4 -										yey, some gravel, light grey
-						wet, mode				
5 -		i								į
-										
-		į								ļ
-	1	i								
- {	Į				İ	Groundwater at	appro	ximately 3	· .	
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<u>.</u>	location of b		LOG C			Project No: 05-487-001 Boring No: AD-02 Date: 1-15-90 Client: American Distributing Co. Driller: D. Alford Location: Bulk Terminal-Everett, WA Drilling Method: Hand / Hole Diameter: 2"	luger
						Logged by: D. Alford Page No: 1 of 1 Installation Data: Backfill with enviroplug	
Jepth (ft)	Graphic Log	Slow/ft	Vapor t Concen- tration (ppm)	and Depth	ł	p Water Level Time Date Comments:) approx. 2.0'	
0 -				Sample #	sp	Grass 0.5-1.0' Sand, coarse grained with occasional gravel, saturat slight petroleum odor.	ed,
3 - 4 5 -	TD = 3.0'			Sample @ 2.5-J.0'	а д	2.5-3.0' Sand, coarse grained with grey/green clayey silt, organic debris, strong petroleum odor, irridescent sheen on water.	
-						Groundwater at approximately 2'	
-							
-							
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		ΣXI	LOG (OF Y BORING	<u> </u>	Project No: 05-487-001 Boring No: AD-03 Date: 1-15-90
- - - -	location of b	oring:				Client: American Distributing Co. Driller: D. Alford Location: Bulk Terminal-Everett, WA Drilling Method: Band Auger Role Diameter: 2" Logged by: D. Alford Page No: 1 of 1 Installation Data: Backfill with enviroplug
epth (ft)	Graphic Log	Blow/ft	Vapor Concen- tration (ppm)	and Depth	1	Water Level Time Date Comments: Approx. 2.0'
2 - 3	TD = 2.0'			Sample @ 0.5-1.0' Sample @ i.5-2.0'		0.5-1.0 Sand, coarse grained, with clay and occasional pebbles/gravel, light brown, moist, no odor. 1.5-2.0 Sand, coarse, grained, increased clay content with gravel, light grey-brown, wet, no odor. Sroundwater at approximately 2.0'

			LOG (Project No: 05-487-001 Boring No.: AD-04
- 8_	ocation of b		·LURATOR)	BORING		Date: 1-15-90 Client: American Distributing Co. Briller: D. Alford Location: Bulk Terminal-Everett, WA Drilling Method: Hand Auger Role Diameter: 2" Logged by: D. Alford Page No: I of 1 Installation Data: Backfill with enviroplug
pth (t)	Graphic Log	Blow/ft	Vapor Concen- tration (ppm)	n- and Depth Symbol on (U.S.C.S.)		
-	TD = 1.0'			5ample @ 0.5-1.0	вp	0.5-1.0 Sand, gravelly, coarse grained sand, light brown to grey, moist to wet, no odor.
-						Groundwater at approximately 9 inches.
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			roc (OF .		Project No:	05-487	-001		Boring No: AD-05		
		EXI	LORATOR	Y BORING						Date: 1-15-90		
-						Client: Ame						
ł.E	ocation of b	ooring:				Location: Bu	Drilling Method: Band Auger Hole Diameter: 2"					
						Logged by: D	. Alfor	-d		Page No: 1 of 1		
						Installation			with envi			
			Vapor	Sample type	Soil Group	Water Level	Time	Date	Commen	•••		
epth	Graphic	Blow/ft	Сопсел-		Symbol	Marer Hevel	11126	Date	Commen	CS:		
(t)	Log		tration	1	{v.s.c.s.}	Approx.		·	-			
-			(ppm)]	3.0'		[
		.]							_			
0 -		4	!		<u> </u>							
-		4	ĺ	Sample @	BC					sand, light grey, loose,		
1 -		4		1.5-2.0						etroleum odor.		
- [1	l	Sample @	sc sc	1.5-2.0' Sand	, clay	ey, coarse	grained	, light grey, loose,		
2 - {	777447777777	3		1.5-2.0'				ght petro				
_ * {	<i>HHHHHH</i>			Sample &	вс					, light grey, loose,		
3 - /	<u> </u>			2.5-3.0	!	mois	t, som	e gravel,	slight pe	etroleum odor.		
_	TD = 3.0'											
4 -						C						
5 -			İ			Groundwater a	c appro	uximately	٥.د			
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		EXC	LOG (LORATOR)			Project No: 05-487-001 Boring No: AD-06
- 3	location of }	- "				Date: 1-15-90 Client: American Distributing Co. Driller: D. Alford Location: Bulk Terminal-Everett, WA Drilling Method: Hand Auger Hole Diameter: 2" Logged by: D. Alford Page No: 1 of 1 Installation Data: Backfill with Enviroplug
epth	Graphic Log	Blow/ft	Vapor Concen- tration (ppm)	and Depth	1	Water Level Time Date Comments: Approx. 1.5'
0 -	TD = 1.0'			Sample @ 0.5-1.0	s p	0.5-1.0 Sand, coarse grained, gravelly, loose, moist, moderate odor.
3 -						Groundwater at approximately 5.0'
5 -						
-	;					
-				-		
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		FYE	LOG C			Project No:	05-487-		Boring No: AD-07	
		5.43	DOMEDKI	BONING		Cliant: Ama	rican D	igtributio	a cò	Date: 1-15-90 Driller: D. Alford
7	location of b	orina:								Drilling Method: Rand Au
,							TATE	-wer-sagig	, n n	Hole Diameter: 2"
						Logged by: D	. Alfor	d		Page No: 1 of 1
						Installation		1+5 =		
						1563112635	Data.	ILU FUAT	, replag	
			Vapor	Sample type	Soil Group	Water Level	Time	Date	Commen	ta.
epth ;	Graphic	Blow/ft	Concen-	1	Symbol		1420	Jale	COmme.	
(ft)	Log		tration	i	(U.S.C.S.)	Approx.				
			(ppm)		·	6"				
j		į		1	ĺ					
<u></u>							 -			
- }		İ	i i	Sample @	sp	0.5-1.0 Sand	, coars	e grained,	gravel.	ly, loose, moist to wet,
1 - }				0.5-1.0"						as irridescent film.
-	TD = 1.0'									
2 -										
-						Groundwater a	t appro	ximately 6	inches.	. è
3 -										
-		İ								
4 -										
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		EXI	LOG	OF Y BORING		Project No:	05-487-	001		Boring No: AD-08 Date: 1-16-90		
	location of b	ooring:	·			Client: American Distributing Co. Driller: D. Alf Location: Bulk Terminal-Everett, WA Drilling Method: Hold Diameter: 2 Logged by: D. Alford Page No: 1 of 1 Installation Data: Backfill with enviroplug						
epth (ft)	Graphic Log	Blow/ft	Vapor Concen- tration (ppm)	and Depth	1	5.0'	Time	Date	Commen	ta:		
2 - 3 - 3 - 3 - 3 - 3 - 3 - 3 - 3 - 3 -				Sample @ 0.5~1.0' Sample @ 2.5-3.0' Sample @ 4.5-5.0'	800 80 80	li 1.5-2.0' Sa to 2.5-3.0' Sa st	ght brownd. coar dark brind, clay cong pet	en, dry, m se grained own, loose sy, with o roleum odd	gravel, medium grained lly, some silt/clay, li , no odor. il gravel, light gray, il gravel, light gray, rated at 5.0°	ight to		
	TD = 5.0'					Groundwater a	t approx	kimately 5	.0'			
-												

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	-		LOG			Project No: 05-487-001 Boring No: AD-09
. .	location of b		PLORATOR	E BORING		Date: 1-16-90 Client: American Distributing Co. Driller: D. Alford Location: Bulk Terminal-Everett, WA Drilling Method: Band Auger Hole Diameter: 2" Logged by: D. Alford Page No: 1 of 1 Installation Data: Backfill with Enviroplug
epth (ft)	Graphic Log	Blow/ft	Vapor Concen- tration (ppm)	and Depth		
2 -	TD = 2.0'			Sample @ 1.5-2.0'	sp.	0.5-1.0' Sand, coarse grained, with occasional gravel, loose, moist, no odor. 1.5-2.0 Sand, with gravel, slightly loose, wet, petroleum odor.
- 4 - 5 -						Groundwater at approximately 1.5'
-						
-						
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-						

<u>.</u>	ocation of b		LOG (Project No: Client: Ame Location: Bu	rican D	istributin:		Boring No: AD-1 Date: 1-16-90 Driller: D. Ali Drilling Method:	-16-90	
						Logged by: D	Hole Dismeter: 2 Page No: 1 of 1	No: 1 of 1				
epth	Graphic Log	Blow/E	Vapor Concen- tration (ppm)	and Depth	Soil Group Symbol (U.S.C.S.)	Approx.	Time	Date	Commen	ts:		
0 1 2 -	TD = 1.5'			Sample @ 0.5-1.0'	ap	0.5-1.0° Sar mod	d with	gravel, lo	oder.	t, visible oil st	ains,	
3 - 4 - - 5 -						Groundwater a	t appro	ximately 1	.25'			
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-			avv.									
-					:							
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		EX	LOG (Project N	io: 05-48	7-001		Boring No: AD-11		
- " \v	location of)					Date: 1-16-90 Client: American Distributing Co. Driller: D. Alford Location: Bulk Terminal-Everett, WA Drilling Method: Han Hole Diameter: 2" Logged by: D. Alford Page No: 1 of 1 Installation Data: Backfill with Enviroplug						
epth	Graphic Log	Blow/ft	Vapor Concen- tration (ppm)	and Depth	Soil Group Symbol (U.S.C.S.)			Date	Сопшен	ITS:		
2 - 3 - 4 - 5	TD = 2.0'			Sample @ 0.5-1.0' Sample @ 1.5-2.0'	дÞ	1.5-2.0	moderate Sandy gra moderate	petroleum vel, loose odor.	odor. , wet, v	t, visible oil stains, isible oil staining as above.		
-						·						

		EX	LOG :			Project No:			_	Boring No: AD-12 Date: 1-16-90		
Ţ	ocation of i	poring:		<u>, , , , , , , , , , , , , , , , , , , </u>		Client: American Distributing Co. Driller: D. Alford Location: Bulk Terminal-Everett, WA Drilling Method: Band Aug Hole Diameter: 2" Logged by: D. Blaes Page No: 1 of 1 Installation Data: Backfill with Enviroplug						
epth (ft)	Graphic Log	Blow/ft	Vapor Concen- tration (ppm)	and Depth		Water Level	Time	Date	Commen			
0 -				Sample @ 0.5-1-0'	sp	0.5-1.0' Sa	nd, with	gravel, m	edium gr	rained, brown, loose, moist,		
- 3 - - 4 -	TD = 3.5'			Sample @ 2.5-3.0' Sample @ 3.0-3.5'		2.5-3.0' Sand, medium grained, gravelly, grey brown, loose, visible oil staining, strong diesel odor. 1.0-3.5' Sand, medium grained, gravelly, grey, wet, strong petroleum odor.						
-						Groundwater a	t approx	cimately 3.	.5,			
-												
-			:									
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									,			

			Project No: 05-487-001 Boring No: AD-13 Date: 1-16-90 Client: American Distributing Co. Driller: D. Alford					Date: 1-16-90			
ield	location of b	poring:	-	·	,	Location	: Bul y: D.	k Term:	inal-Evere	ett, WA	Drilling Hethod: Hand Auger Hole Diameter: 2" Page No: 1 of 1
epth	Graphic Log	Blow/ft	Vapor Concen- tration (ppm)		Soil Group Symbol (U.S.C.S.)	ļ		Tima	Data	Commen	ts:
0 - 1 - 2 -				Sample @ 0.5-1.0'	sm.		mois	t, mod	erate pet:	roleum o	gravel, light brown-brown, dor. loose, very moist, visible
3 -	TD = 2.5			2.0-2.5'		Groundwat:	petr er ap	oleum : proxima	staining, ately 2.5°	strong [etroleum odor.
5 -							cides				water. Ground water has
-											
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		EXI	LOG C			Project No:				Boring No: AD-14 Data: 1-16-90		
	location of 1	boring:				Client: Ame Location: Bu Logged by: D	lk Tera	d	ett, WA	Role Diameter: 2" Page No: 1 of 1		
epth (ft)	Graphic Log	Blow/ft	Vapor Concen- tration (ppm)	and Depth	Symbol (U.S.C.S.)	Water Level Approx. 2.5'	Time	Date	Commen	ta:		
0 - 1 - 2 - 3 -	TD = 2.5'			Sample @ 0.5~1.0' Sample @ 2.0~2.5'	ab ab	moi 2.0-2.5' San	st, mod d, grav	derate pet	roleum od rse grain	ned, brown-dark brown, loose, dor. ned, brown-dark brown, loose, a odor, visible staining.		
5 -						Groundwater a	proxim	ately 2.5				
-												
-												
-									~			
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		EXI	LOG (Project No:				Boring No: AD-15 Date: 1-17-90	
i	ocation of t	poring:				Client: Ame Location: Bu Logged by: D Installation	lk Term . Blaes	inal-Evere	ett, WA	Hole Diameter: 2" Page No: 1 of 1	
apth (ft)	Graphic Log	Blow/ft	Vapor Concen- tration (ppm)	and Depth	Soil Group Symbol (U.S.C.S.)	Approx.	Time	Date	Comman	ts:	
0 - 1 - 2 - 3 - 4	TD = 3.0'		(PPm)	Sample @ 0.5-1.0' Sample @ 2.5-3.0'		0.5-1.0' San odd 2.5-3.0' San	d, medi , very	um grained strong gas not retain	i, gray soline on		

		EXF	LOG (Project No:	05-487-	-001	Boring No: AD-16 Date: 1-17-90 Driller: D. Blaes Orilling Method: Hand Auger Hole Diameter: 2" Page No: 1 of 1	
16	cation of 1	poring:				Client: Ame Location: Bu Logged by: D Installation	lk Tern . Blaes	inal-Ever		
apth	Graphic Log	Blow/ft	Vapor Concen- tration (ppm)	and Depth	1	Approx.	Time	Date	Commen	t9:
0 - 1 - 2 -	TD = 1.5'			Sample @	ap					gray, loose, wet, visible ong gasoline odor.
3 ~ 4 ~ 5 -						Groundwater a	t appro	oximately	1.5'	
-								·		
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		EXI	LOG (Project No: 05-487-001 Boring No: AD-17 Date: 1-17-90
	location of	boring:	<u> </u>	-		Client: American Distributing Co. Driller: D. Blaes Location: Bulk Terminal-Everett, WA Drilling Method: Hand Auger Hole Diameter: 2" Logged by: D. Blaes Page No: 1 of 1 Installation Data: Backfill with Enviroplug
epth	Graphic Log	Blow/ft	Vapor Concen- tration (ppm)	and Depth	Soil Group Symbol (U.S.C.S.)	Water Level Time Date Comments: Approx. 1.0'
0 1 2 -	TD # 1.0'			Sample @ 0.5-1.0'	sp	Grass 0.5-1.0' Sand, medium grained, gravel, dark grey loose, wet, moderate gasoline odor.
3 -						Groundwater at approximately 1.0'
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Į.	ocation of b	paring:	•							
epth (t)	Graphic Log	Blow/ft	Vapor Concen- tration (ppm)	and Depth	Soil Group Symbol (U.S.C.S.)	Approx.	Time	Date	Commen	ts:
0 1 2 3 4				Sample @ 0.5-1.0'	ac sc	1.0~4.0' Sand debr	, medin is, med 3.0'	um grained dium dense	, clayey,	y cohesive, moist, no odor, brown to grey, organic moderate diesel odor at
5 -	TD = 4.5'			4-0-5.0'			light d	liesel odo	r.	grey to black, moderate
-										
-										
-										
-										
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		EX	LOG (Project No: 05-487-001 Boring No: AD-19 Date: 1-17-90
1	ocation of	boring:				Client: American Distributing Co. Driller: D. Black Location: Sulk Terminal-Everett, WA Drilling Method: Hand Auger Hole Diameter: 2" Logged by: D. Black Installation Data: Backfill with Enviroplug
epth	Graphic Log	Blow/ft	Vapor Concen- tration (ppm)	and Depth	Soil Group Symbol (U.S.C.S.)	Approx. 1.5' Date Comments:
0	TD = 1.5'			Sample @ 0.5-1.0' Sample @ 1.0-1.5'	ap	Grass 0.5-1.0' Sand, fine to medium grained, grey to black, loose, moist, moderate diesal odor. 1.0-1.5' Sand, fine to medium grained, grey to black, loose, moist, soil saturated with diesal fuel cil. (probable free product on groundwater surface) Groundwater at approximately 1.5'
-					·	

TEST PIT LOGS

Depth (feet)	Soil Classification	11-04558-04								
Test Pit TP-1										
0.0 - 0.5	Gravel surface									
0.5 - 1.5	- 1.5 Loose, wet, dark grayish-brown, silty SAND with gravel (Fill)									
1.5 - 3.5	- , ,									
	Strong petroleum-like odor and black oily staining observed;									
	Test pit terminated at approximately 3.5 feet									
	Moderate groundwater and liquid petroleum hydrocarbon seepage below 3 feet									
	Field FT-IR analysis indicated > 4,600 ppm TPH at 3 foot depth									
	Test Pit TP-2									
0.0 - 0.5	Gravel surface; old A/C at 0.5 feet									
0.5 - 4.0	Loose, wet to saturated, gray, coarse SAND with gravel									
	No unusual odors or staining observed;									
	Test pit terminated at approximately 4.0 feet									
	Moderate groundwater seepage observed below 3.5 feet									
	A large block of concrete encountered at a depth of approximately 1 fo	ot								
	Field FT-IR analysis indicated 30 ppm TPH at 3.5 foot depth									
	Test Pit TP-3									
0.0 - 0.5	Gravel surface old A/C at 0.5 feet									
0.5 - 4.0	Loose, wet to saturated, gray, coarse SAND with gravel									
	Test pit terminated at approximately 4.0 feet									
	Moderate groundwater seepage observed below 3.5 feet									
	Slight surface sheen observed on groundwater emanating from the east s	side of the test								
	pit .									

Field FT-IR analysis indicated 80 ppm TPH at 3.5 foot depth

Depth (feet)	Soil Classification
	Test Pit TP-4
0.0 - 0.5	Gravel surface
0.5 - 4.0	Loose, wet to saturated, gray, coarse SAND with gravel
	Test pit terminated at approximately 4.0 feet
	Moderate groundwater seepage observed below 3.5 feet
	No unusual odors or staining observed
	Field FT-IR analysis indicated 30 ppm TPH at 3.5 feet
	Test Pit TP-5
0.0 - 0.5	Gravel surface
0.5 - 4.0	Loose, wet to saturated, gray, coarse SAND with gravel
	Test pit terminated at approximately 4.0 feet
	Moderate groundwater seepage observed below 3.5 feet
	No unusual odors or staining observed
	Field FT-IR analysis indicated 50 ppm TPH at 3.5 feet

Date excavated: 8 December 1993

Logged by: TJP

Backhoe Test Pit Logs

TP-1-96

Gray, moist to wet, silty SAND with gravel and some cobbles. Met with refusal at a depth of approximately 3.0 feet due to buried concrete. Slow seepage observed at approximately 1.5 feet. Soil exhibits a petroleum hydrocarbon-like odor. After approximately 1.5 hours, discontinuous blebs of LPH were observed on the water accumulated in the test pit.

TP-2-96

Brown, moist to wet, silty SAND with gravel and some wood and metal debris; becomes gray below approximately 1.0 feet. Slow seepage observed at approximately 1.0 feet and again below approximately 4.0 feet. Soil exhibits a petroleum hydrocarbon-like odor. After approximately 1.5 hours, discontinuous blebs of LPH were observed on the water accumulated in the test pit. Test pit terminated at approximately 4.5 feet.

TP-3-96

Gray, moist, gravelly SAND with some silt with scattered wood and brick debris. Underlain at approximately 4.0 feet by gray, wet to saturated, cohesive, silty, fine to medium SAND. Slow seepage observed at approximately 1.5 feet. Moderate seepage observed below a depth of approximately 6.0 feet. Soil exhibits a petroleum hydrocarbon-like odor. No LPH observed; sheen present of water accumulated in the test pit. Test pit terminated at approximately 6.5 feet.

Backhoe Test Pit Logs

TP-4-96

Brown, moist to wet, silty SAND with some gravel; becomes gray with a petroleum hydrocarbon-like odor below 2.5 feet. Slow seepage observed below approximately 5.0 feet. Discontinuous blebs of LPH observed on the groundwater accumulated in the bottom of the test pit. Test pit terminated at approximately 6.0 feet.

TP-5-96

Brown, moist to wet, silty SAND with some gravel with some brick and glass debris; becomes gray with a petroleum hydrocarbon-like odor below 2.5 feet. Slow seepage observed below approximately 5.0 feet. Encountered a 4-inch diameter clay pipe at approximately 4.5 feet. LPH and water drained from the pipe for approximately 10 to 15 minutes after digging through the pipe. Discontinuous blebs of LPH observed on the groundwater accumulated in the bottom of the test pit. The LPH appeared to originate from both seepage from the soil and infiltration from the broken clay pipe. Test pit terminated at approximately 6.0 feet.

TP-6-96

Brownish-gray, moist to wet, silty SAND with gravel and wood debris; becomes gray with a petroleum hydrocarbon-like odor below approximately 2.0 feet. Moderate to rapid LPH and groundwater seepage observed below approximately 4.0 feet. Approximately 0.02 feet of LPH accumulated as a continuous layer on top of groundwater pooled inside of the test pit. Test Pit terminated at approximately 6.0 feet.

TP-7-96

Moist to wet, dark brown to black, SAND with some silt and gravel; strong petroleum hydrocarbon-like odor observed. Moderate LPH and groundwater seepage observed below 3.0 feet. LPH accumulated as a continuous layer on top of the groundwater pooled in the test pit. LPH thickness was approximately 0.10 feet. Test pit terminated at approximately 4.0 feet.

Page 1

APPENDIX D SELECTED GEOTECHNICAL BORING LOGS

LOG OF BORING NO. DM-7-99

PROJECT: California Street Overcrossing PROJECT NO: 04333-041-189 PROJECT LOCATION: Everett, WA WATER LEVEL: ¥7.00 ft CLIENT NAME: Port of Everett DATE STARTED: December 8, 1999 ELEVATION: 18 ft DATE COMPLETED: December 8, 1999 TOTAL DEPTH: 45.00 ft DRILLING CONTRACTOR: Cascade Drilling WEATHER: Light rain FIELD ENGINEER: BBS DRILLER: Scott Kruger DRILLING METHOD: Hollow Stem Auger to Mud Rotary CHECKED BY: SAMPLING METHOD: D&M U, 300lb hammer, 30" drop SAMPLE TYPE KEY: MOISTURE CONTENT (%) FINES CONTENT (%) DRY DENSITY (pcf) BLOWS PER FOOT ELEVATION (ft.) Relatively undisturbed sample **Bag Sample** DEPTH (ft.) SAMPLE TYPE USCS Disturbed sample Sample attempt with no recovery SPT split spoøn sample DÉSCRIPTION REMARKS 18 0 brown woogly debris mixed in with brown silty SAND (FILL) SM Dark to reddish brown medium to fine SAND with trace silt and fine gravel (loose to medium dense with depth)(wet) 13 18 Petroleum Odor Detected in samples 1, 2, 3 (0 - 15 feet below ground surface) PID = 0 6.3 108 12.7 11 WA 9812: 20 17 18 DMSEA6.GDT 25 18 22 KN16310-PROJECT04333041, GPJ ML Gray SILT with some medium sand and trace gravel (hard)(low plasticity)

AMES & MOORE A DAMES & MOORE GROUP COMPANY

30

NOTES: PID is a Photo Ionization Detector that detects the presence of volatile hydrocarbons

LOG OF BORING DM-7-99

PROJECT: California Street Overcrossing PROJECT NO: 04333-041-189

FIELD ENGINEER: BBS

Sheet 2 of 2

PROJECT LOCATION: Everett, WA CHECKED BY: SAMPLE TYPE KEY: FINES CONTENT (%) DRY DENSITY (pdf) MOISTURE CONTENT (%) BLOWS PER FOOT ELEVATION(ft.) Relatively undisturbed sample Bag sample DEPTH (ft.) SAMPLE SSS Disturbed sample Sample attempt with no recovery SPT split spoon sample DESCRIPTION REMARKS 30 25.8 18 Brown medium SAND with some silt and trace of fine gravel SM (very dense)(wet) 35 50/6" 12 107.2 15 -22 40 **1**B 109.6 11.4 10 100/101 End of Boring at 46 feet below ground surface Ground water encountered at 7 feet below ground surface NOTES: PID is a Photo ionization Detector that detects the presence of volatile hydrocarbons

DAMES & MOORE
A DAMES & MOORE GROUP COMPANY

LOG OF BORING DM-7-99

LOG OF BORING NO. DM-8-99

PROJECT: California Street Overcrossing

PROJECT NO: 04333-041-189
PROJECT LOCATION: Everett, WA

CLIENT NAME: Port of Everett

DATE STARTED: December 1, 1999
DATE COMPLETED: December 1, 1999

DRILLING CONTRACTOR: Cascade Drilling

DRILLER: Scott Kruger

DRILLING METHOD: Hollow Stem Auger to Mud Rotary SAMPLING METHOD: D&M U, 300lb hammer, 30" drop

AMES & MOORE

A DAMES & MOORE GROUP COMPANY

WATER LEVEL: ¥5.00 ft

ELEVATION: 18 ft

TOTAL DEPTH: 50.00 ft

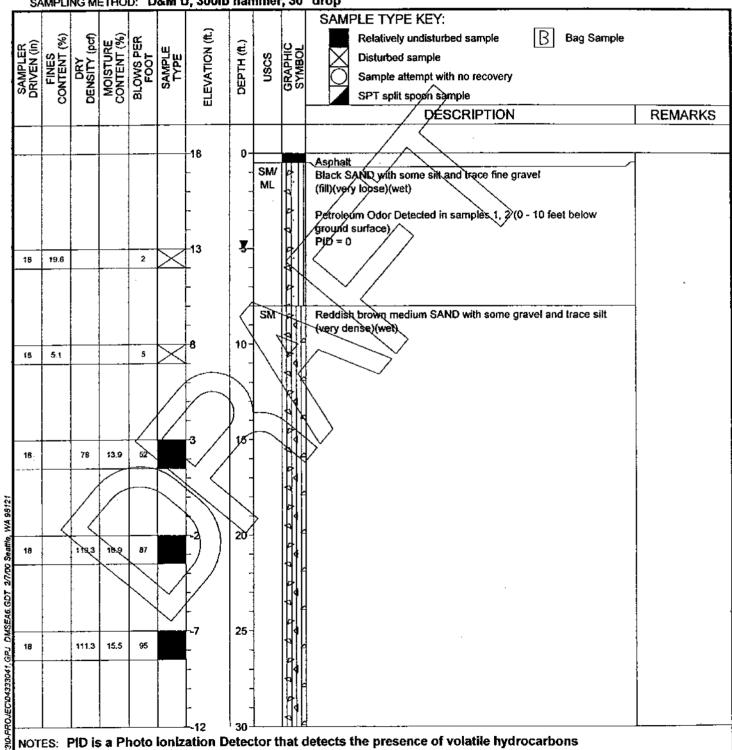
WEATHER: Overcast, light rain

LOG OF BORING DM-8-99

FIGURE A-10.1

FIELD ENGINEER: BBS

CHECKED BY:



PROJECT: California Street Overcrossing

PROJECT NO: 04333-041-189

FIELD ENGINEER: BBS CHECKED BY:

Sheet 2 of 2

PROJECT LOCATION: Everett, WA SAMPLE TYPE KEY: MOISTURE CONTENT (%) BLOWS PER FOOT Bag sample DENSITY (pcf) ELEVATION(R.) Relatively undisturbed sample SAMPLER DRIVEN (in) DEPTH (ft.) SAMPLE nscs Disturbed sample Sample attempt with no recovery SPT split spoon sample DESCRIPTION REMARKS 30 50/3" 113.1 14.3 35 50/6" >< ML Gray SILT with trace fine to medium sand and fine gravel (very stiff) -22 40 -27 45 90.2 36 Gray fine to medium SAND with some silt 'MZ (very dense)(wet) 50√ 50/6" 18 End of Boring at 51.5 feet below ground surface Ground water encountered at 5 feet below ground surface NOTES: PID is a Photo Ionization Detector that detects the presence of volatile hydrocarbons

DAMES & MOORE

A DAMES & MOORE GROUP COMPANY

LOG OF BORING DM-8-99

MONITORING WELL NO. DM-6-99

PROJECT: California Street Overcrossing PROJECT NO: 04333-041-189 WATER LEVEL: ¥0.00 ft PROJECT LOCATION: Everett. WA CLIENT NAME: Port of Everett ELEVATION: +20.00 DATE STARTED: December 6, 1999 TOTAL DEPTH: 55.00 ft DATE COMPLETED: December 6, 1999 WEATHER Overcast, light rain DRILLING CONTRACTOR: Cascade Drilling FIELD ENGINEER: BBS DRILLER: Scott Kruger DRILLING METHOD: Hollow Stem Auger to Mud Rotary CHECKED BY: SAMPLING METHOD: D&M U, 300lb hammer, 30" drop SAMPLE TYPE KEY: MOISTURE CONTENT (%) FINES CONTENT (%) BLOWS PER FOOT ELEVATION (A.) Relatively undisturbed sample Bag Sample SAMPLER DRIVEN (in) DEPTH (ft.) USCS DRY DENSITY (Disturbed sample Sample attempt with no recovery SPT split spoøn sample WELL CONSTRUCTION DETAIL & REMARKS DÉSCRIPTION ELEVATION T -20.0 ٥. Blackish Brown fine sandy SILTwith trace gravel SM (possible fill)(soft)(moist) ML Gray brown predigm to fine SAND with trace to some silt and fine SM 15.0 5-99.B 25.3 18 15 (medium dense)(wet) Retroleum Odor Detected in samples 1, 2 (0 - 10 feet below ground surface) PID = 810.0 10 18 103.1 16.5 14 18 128.6 13,6 18 25 18 14.3 90.6 14.3 14 ML Dark gray SILT with some fine sand (very stiff)(low plasticity) 10.0 NOTES: PID is a Photo Ionization Detector that detects the presence of volatile hydrocarbons **MONITORING WELL DM-6-99** Bentonite grout

Well screen

Concrete plug

FIGURE A-8.1

Bentonite plug

Filter Pack

DAMES & MOORE KEY:

A DAMES & MOORE GROUP COMPANY

PROJECT: California Street Overcrossing

PROJECT NO: 04333-041-189

FIELD ENGINEER: BBS CHECKED BY:

Sheet 2 of 2

Everett, WA PROJECT LOCATION: SAMPLE TYPE KEY: MOISTURE CONTENT (%) BLOWS PER FOOT <u>ලි</u> Relatively undisturbed sample Bag sample **ELEVATION(ft.** DEPTH (ft.) FINES CONTENT (DRY DENSITY (uscs Disturbed sample Sample attempt with no recovery SPT split spoon sample WELL CONSTRUCTION DETAIL & REMARKS DESCRIPTION ELEVATION 10.0 30 18 103,6 18.9 26 SM Brown medium SAND with some silt and trace gravel (very dense)(wet) 15.0 20.2 \$8 for 1 SP Gray brown medium SANQ with trace silt and fine gravel (very dense)(wet) -20.0 40 8 for 11 18 -25.00 25.0 45 18 109 4 20.1 96 for 11 30.0 12 50 for 5 35.0 55 12 50 for : K:\t63\Q-PROJEC\04333041.GPJ DMSE46.GDT 27/00 Seettle, WA 9812 End of boring at 56 feet below ground surface Ground water encountered 6 feet below ground surface NOTES: PID is a Photo Ionization Detector that detects the presence of volatile hydrocarbons

DAMES & MOORE
ADAMES & MOORE GROUP COMPANY

WELL SYMBOL KEY:



Bentonite grout
Bentonite plug
Filter Pack

MONITORING WELL DM-6-99
Well screen

Concrete plug

FIGURE A-8.2

Boring completed at 14' on 10/01/99. Groundwater encountered at 5' bgs during drilling and at 4.5' before developing well. Developed / purged 10 gallons until water turned clear.

DATE DRILLED: 10-1-99 LOGGED BY: S. Lewis REVIEWED BY: Jim Schmidt SURFACE ELEVATION (feet): TOTAL DEPTH (feet): 14.0 DIAMETER OF BORING (in): 8 OD

DRILLING METHOD: Mobile B-59

DRILLER: Holt Drilling

CASING SIZE: 2" DIAMETER WELL

KLEINFELDER

GEOTECHNICAL AND ENVIRONMENTAL ENGINEERS SOILS AND MATERIALS TESTING

PROJECT NUMBER: 60-1914-01

Mobile Everett, Washington

FIGURE
A - 2

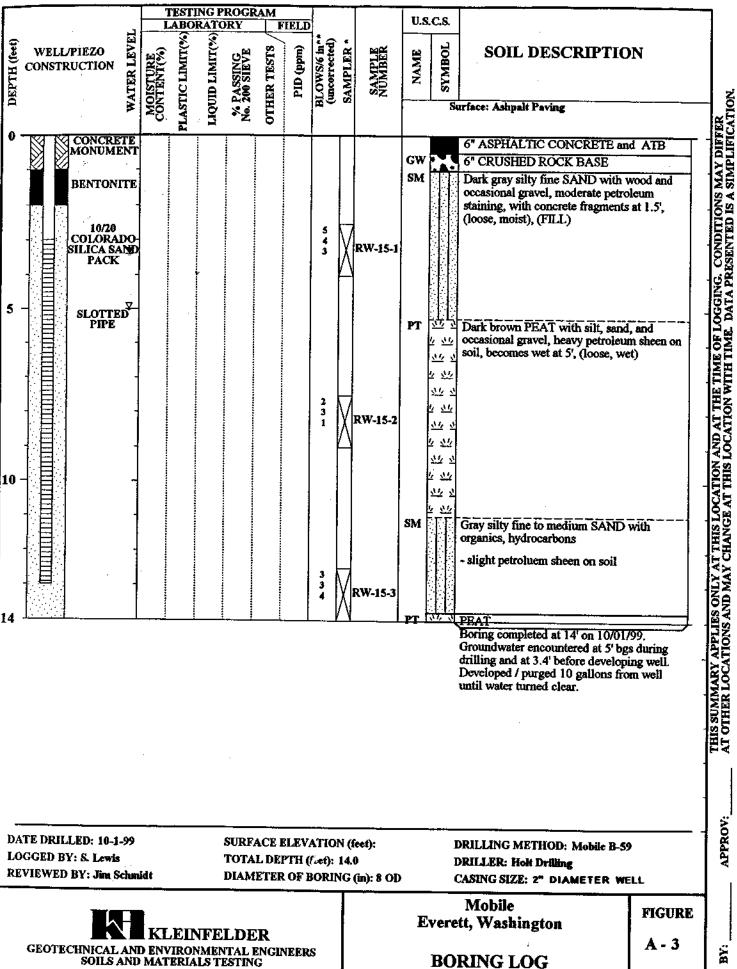
BORING LOG RW-10

PAGE 1 of 1

A DDDD OV.

THIS SUMMARY APPLIES ONLY AT THIS LOCATION AND AT THE TIME OF LOGGING. CONDITIONS MAY DIFFER AT OTHER LOCATIONS AND MAY CHANGE AT THIS LOCATION WITH TIME. DATA PRESENTED IS A SIMPLIFICATION.

,,,,,



RW-15

PROJECT NUMBER: 60-1914-01

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PAGE 1 of 1

THIS SUMMARY APPLIES ONLY AT THIS LOCATION AND AT THE TIME OF LOGGING. CONDITIONS MAY DIFFER AT OTHER LOCATIONS AND MAY CHANGE AT THIS LOCATION WITH TIME. DATA PRESENTED IS A SIMPLIFICATION.

APPROV:

A - 4 PAGE 1 of 1 APPENDIX B BORING LOGS

PROJECT: California Street Overcrossing

PROJECT NO: 04333-041-189 PROJECT LOCATION: Everett, WA CLIENT NAME: Port of Everett DATE STARTED: September 25, 2000 DATE COMPLETED: September 25, 2000

DRILLING CONTRACTOR: Cascade Drilling

WATER LEVEL: ¥4.00 ft

ELEVATION: 18 ft TOTAL DEPTH: 12.00 ft

WEATHER:

FIELD ENGINEER: T. Parkington DRILLER: CHECKED BY: M. McCabe DRILLING METHOD: Geoprobe SAMPLING METHOD: Geoprobe SAMPLE TYPE KEY: MOISTURE CONTENT (%) ELEVATION (ft.) Β BLOWS PER FOOT Relatively undisturbed sample Bag Sample DEPTH (ft.) GRAPHIC SYMBOL FINES CONTENT (DRY DENSITY (uscs Pocket Penetrometer Disturbed sample Vane Shear (psf) Sample attempt with no recovery SPT split spoon sample DESCRIPTION REMARKS -18 Asphaitic Concrete GP Gravel subgrade РΤ Dark brown silty peat PID = 3 ppmŢ. 5 PID = 24 ppm SM Black silty sand with some woody peat PID = 2 ppmSM Brown sand with some silt. h.c. odor 10 Brown gray sand, wet. mqq 0 = GlPNo odor Boring completed at 12 feet. Backfilled with Bentonite. Ground water at 4 feet bgs. KN6304333-TIGEOPROBE GPJ URSSEAT.GLB URSSEAT.GDT 11/3/00 Seattle, WA 98f21

NOTES:

LOG OF BORING UG-1

PROJECT: California Street Overcrossing

PROJECT NO: 04333-041-189 PROJECT LOCATION: Everett. WA

CLIENT NAME: Port of Everett DATE STARTED: September 25, 2000 DATE COMPLETED: September 25, 2000

DRILLING CONTRACTOR: Cascade Drilling

DRILLER:

DRILLING METHOD: Geoprobe

WATER LEVEL: ¥3,00 ft

ELEVATION: 16 ft

TOTAL DEPTH: 17.00 ft

WEATHER:

FIELD ENGINEER: T. Parkington

CHECKED BY: M. McCabe

LOG OF BORING UG-2

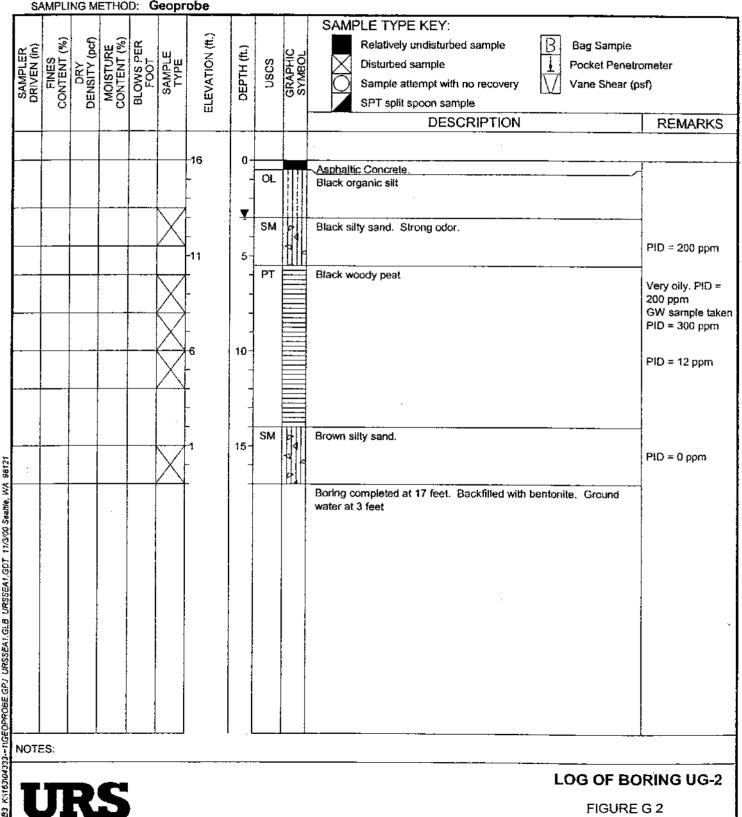


FIGURE G 3

PROJECT: California Street Overcrossing PROJECT NO: 04333-041-189 PROJECT LOCATION: Everett, WA WATER LEVEL: ¥ 5.00 ft CLIENT NAME: Port of Everett DATE STARTED: September 25, 2000 ELEVATION: 18 ft DATE COMPLETED: September 25, 2000 TOTAL DEPTH: 14.50 ft DRILLING CONTRACTOR: Cascade Drilling WEATHER: DRILLER: FIELD ENGINEER: T. Parkington DRILLING METHOD: Geoprobe CHECKED BY: M. McCabe SAMPLING METHOD: Geoprobe SAMPLE TYPE KEY: FINES CONTENT (%) DRY DENSITY (pcf) MOISTURE CONTENT (%) BLOWS PER FOOT ELEVATION (ft. Relatively undisturbed sample Bag Sample SAMPLER DRIVEN (In) SAMPLE TYPE DEPTH (ft.) uscs Disturbed sample Pocket Penetrometer Sample attempt with no recovery Vane Shear (psf) SPT split spoon sample DESCRIPTION REMARKS -18 Asphaltic Concrete. GP Gravel subgrade SM Gray brown sitty sand PID = 0 ppm Ţ Red-tan sitty sand P1D = 0 ppmSM/ Brown silty sand / sandy silt with lenses of woody peat. PID = 1 ppm ML 10 No evidence of hydrocarbons in water on rods Boring completed at 14.5 feet. Backfilled with bentonite. Groundwater at 5 feet bgs. NOTES: LOG OF BORING UG-3 PROJECT: California Street Overcrossing

PROJECT NO: 04333-041-189
PROJECT LOCATION: Everett, WA
CLIENT NAME: Port of Everett
DATE STARTED: September 25, 2000
DATE COMPLETED: September 25, 2000

ELEVATION: 20 ft TOTAL DEPTH: 14.50 ft

WATER LEVEL: ¥4.00 ft

DRILLING CONTRACTOR: Cascade Drilling DRILLER:

TOTAL DEPTH: **14.** WEATHER:

DRILLING METHOD: Geoprobe

FIELD ENGINEER: T. Parkington
CHECKED BY: M. McCabe

SA				D: G	еорг	obe					
SAMPLER DRIVEN (in)	FINES CONTENT (%)	DRY DENSITY (pcf)	MOISTURE CONTENT (%)	BLOWS PER FOOT	SAMPLE TYPE	ELEVATION (ft.)	ОЕРТН (#.)	nscs	GRAPHIC SYMBOL	SAMPLE TYPE KEY: Relatively undisturbed sample Disturbed sample Sample attempt with no recovery SPT split spoon sample DESCRIPTION	
-						20	0-	GP	. ,	Gravel	
						<u> </u> -	 	SM		Brown sand with some silt and gravet. No odor	-
					X	<u> </u> -	<u> </u>		7 4		PID = 0 ppm
					X	- - -	5-	ML		Gray silt	PIO = 0 ppm
					X	-10	10-	SM	5 6 5 6 5 6 5 6 5 6 5 5 6 5 5 6 5 5 6 5 5 6 5 5 6 6 5 6 6 5 6 6 5 6 6 5 6 6 5 6 6 5 6	Brown sand with some silt	PID = 0 ppm
									***	Boring completed at 14.5 feet. Backfilled with bentonite. Groundwater at 4 feet.	

NOTES:

URS

LOG OF BORING UG-4

FIGURE G 5

LOG OF BORING NO. UG-5

PROJECT: California Street Overcrossing PROJECT NO: 04333-041-189 PROJECT LOCATION: Everett. WA WATER LEVEL: ¥6.00 ft CLIENT NAME: Port of Everett ELEVATION: 19 ft DATE STARTED: September 25, 2000 TOTAL DEPTH: 12.00 ft DATE COMPLETED: September 25, 2000 DRILLING CONTRACTOR: Cascade Drilling WEATHER: DRILLER: FIELD ENGINEER: B. Strickler DRILLING METHOD: Geoprobe CHECKED BY: M. McCabe SAMPLING METHOD: Geoprobe SAMPLE TYPE KEY: FINES CONTENT (%) DRY DENSITY (pcf) MOISTURE CONTENT (%) BLOWS PER FOOT ELEVATION (ft.) Relatively undisturbed sample Bag Sample DEPTH (ft.) SAMPLE TYPE GRAPHIC SYMBOL uscs Disturbed sample Pocket Penetrometer Vane Shear (psf) Sample attempt with no recovery SPT split spoon sample DESCRIPTION REMARKS GP Gravel SM Brown sitty sand with trace gravel. No odor. PID = 0 ppm5. PID = 0 ppmSM Gray silty sand PID = 0 ppmSM Dark brown silty sand with trace gravel and wood fragments. 10 PID = 0 ppmEnd of boring at 12 feet. Backfilled with bentonite. Ground water at 6 feet bgs. NOTES: LOG OF BORING UG-5

PROJECT: California Street Overcrossing

PROJECT NO: 04333-041-189
PROJECT LOCATION: Everett, WA

CLIENT NAME: Port of Everett
DATE STARTED: September 26, 2000
DATE COMPLETED: September 26, 2000

DRILLING CONTRACTOR: Cascade Drilling

DRILLER:

DRILLING METHOD: Geoprobe

WATER LEVEL: ¥5.00 ft

ELEVATION: 18 ft

TOTAL DEPTH: 12.00 ft

WEATHER:

FIELD ENGINEER: B. Strickler

CHECKED BY: M. McCabe

LOG OF BORING UG-6

SAMP	PLING ME	THO	D: G	eopr	obe					<u></u>										
SAMPLER DRIVEN (in) FINES	CONTENT (%) DRY DENSITY (pcf)	MOISTURE CONTENT (%)	BLOWS PER FOOT	SAMPLE TYPE	ELEVATION (ft.)	DEPTH (ft.)	nscs	GRAPHIC SYMBOL	SAMPLE TYPE KEY: Relatively undisturbed sample Disturbed sample Sample attempt with no recovery SPT split spoon sample DESCRIPTION	:										
-					- 18 -	0-	SM/ GM	2 0 0	Brown silty gravel and sand											
				X	- -13		SM	4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4	Gray silty sand, some gravel. No odor. Traces of brown color	PID = 0 ppm PID = 0 ppm										
-				X	, r	- - 10-	SP	\$ \$ \$ \$ \$ \$	Some wood fragments. Brown sand, sift and gravel.	PiD = 0 ppm										
			:	X	<u></u>	-	_		End of boring at 12 feet. Backfilled with bentonite. Ground water at 5 feet bgs.	PID = 0 ppm										
										di										
		;																		
						:														
NOTES:	 ;				'	•														

PROJECT: California Street Overcrossing PROJECT NO: 04333-041-189

PROJECT LOCATION: Everett, WA

CLIENT NAME: Port of Everett

CATE STARTED: September 26, 2000

DATE STARTED: September 26, 2000
DATE COMPLETED: September 26, 2000

DRILLING CONTRACTOR: Cascade Drilling

DRILLER:

DRILLING METHOD: Geoprobe

WATER LEVEL: ¥ 2.00 ft

ELEVATION: 16 ft

TOTAL DEPTH: 12.00 ft

WEATHER:

FIELD ENGINEER: B. Strickler

CHECKED BY: M. McCabe

SAMPLER DRIVEN (in)	FINES CONTENT (%)	DENSITY (pcf)	MOISTURE CONTENT (%)	BLOWS PER FOOT	SAMPLE TYPE	ELEVATION (ft.)	DEPTH (ft.)	SOSO	GRAPHIC SYMBOL	SAMPLE TYPE KEY: Relatively undisturbed sample Disturbed sample Sample attempt with no recovery SPT split spoon sample DESCRIPTION	
						16	5-	SM	7 4 4 5 4 4 5 4 4 5 4 5 4 5 5 5 5 5 5 5	Asphaltic Concrete. Dark brown to gray silty sand with some gravel Some wood fragments Dark brown sand with some silt and gravel. End of boring at 12 feet. Backfilled with bentonite. Groundwater at 2 feet bgs.	PID = 0 ppm PID = 0 ppm PID = 0 ppm

URS

LOG OF BORING UG-7

PROJECT: California Street Overcrossing

PROJECT NO: 04333-041-189
PROJECT LOCATION: Everett, WA

CLIENT NAME: Port of Everett
DATE STARTED: September 26, 2000
DATE COMPLETED: September 26, 2000

DRILLING CONTRACTOR: Cascade Drilling

DRILLER:

NOTES:

DRILLING METHOD: Geoprobe SAMPLING METHOD: Geoprobe

WATER LEVEL: ₹4.00 ft

ELEVATION: 17 ft TOTAL DEPTH: 19.50 ft

WEATHER:

FIELD ENGINEER: B. Strickler CHECKED 8Y: M. McCabe

LOG OF BORING UG-8

	1 3						
SAMPLER DRIVEN (in) FINES CONTENT (%) DRY DENSITY (pcf) MOISTURE CONTENT (%) BLOWS PER	SAMPLE TYPE	ELEVATION (ft.)	טפריה (יגי)	nscs	GRAPHIC SYMBOL	SAMPLE TYPE KEY: Relatively undisturbed sample Disturbed sample Sample attempt with no recovery SPT split spoon sample DESCRIPTION	
		-17	0	00.0			
		-	+	GP °	i Pall	Gravel Gray silty sand with some gravel	
			<u>•</u>	SM	7 €	Dark brown to black silty sand with some gravel and wood fragmenst.	PID = 186 ppm
		-12 -	5-		P	Strong odor Strong odor	P1D = 180 ppm
		-	- 5	SM	₽ Q 4	Gray silty sand with some gravel Black silty sand with some wood fragments. Strong odor	PID = 105 ppm
354,4		-7 1 1	0	РТ		Black woody peat, strong odor. Color grades to red with no odor.	PiD = 5 ppm
		-	-				PID = 0 ppm
		-2 1:	5-			Brown sand with some silt and gravel. Faint odor	
	X	- -				No odor.	PID = 0 ppm
						End of boring at 19.5 feet. Backfilled with bentonite. Gound water at 4 feet bgs.	

PROJECT: California Street Overcrossing

PROJECT NO: 04333-041-189 PROJECT LOCATION: Everett, WA CLIENT NAME: Port of Everett

ELEVATION: 18 ft

DATE STARTED: September 26, 2000 DATE COMPLETED: September 26, 2000 DRILLING CONTRACTOR: Cascade Drilling

TOTAL DEPTH: 17.00 ft WEATHER:

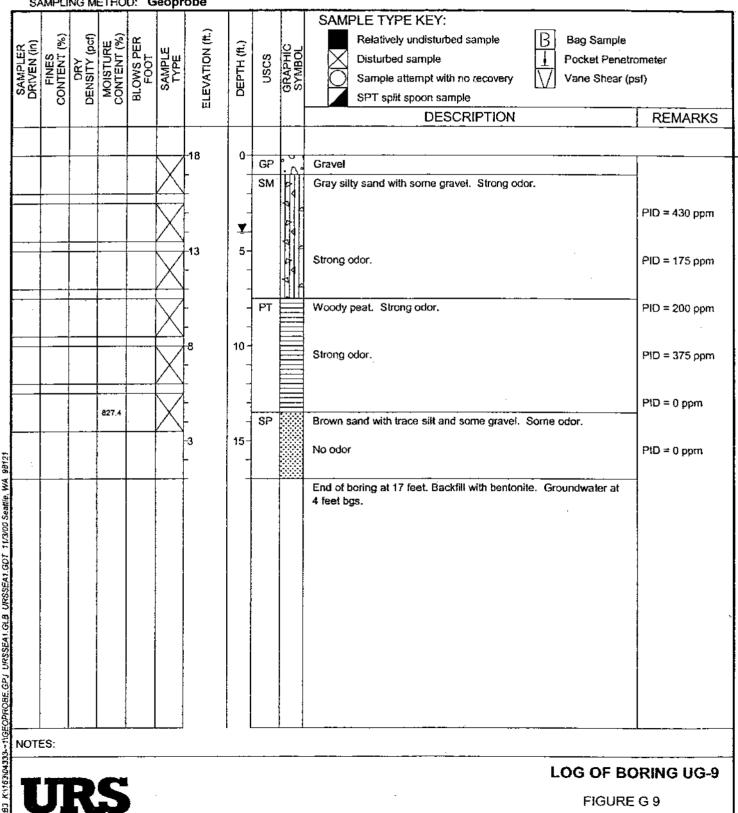
WATER LEVEL: ¥4,00 ft

DRILLER:

FIELD ENGINEER: B. Strickler

DRILLING METHOD: Geoprobe SAMPLING METHOD: Geoprobe

CHECKED BY: M. McCabe



LOG OF BORING UG-9

PROJECT: California Street Overcrossing

PROJECT NO: 04333-041-189 PROJECT LOCATION: Everett, WA

CLIENT NAME: Port of Everett DATE STARTED: September 26, 2000

DATE COMPLETED: September 26, 2000

DRILLING CONTRACTOR: Cascade Drilling

DRILLER:

DRILLING METHOD: Georgobe

WATER LEVEL: ¥3.00 ft

ELEVATION: 18 ft

TOTAL DEPTH: 12.00 ft

WEATHER:

FIELD ENGINEER: B. Strickler

CHECKED BY: M. McCabe

LOG OF BORING UG-10

DRILLING METHOD: G SAMPLING METHOD: G	eaprobe eoprobe		CHECKED BY: M.	AcCabe
SAMPLER DRIVEN (in) FINES CONTENT (%) DENSITY (pct) MOISTURE CONTENT (%) BLOWS PER FOOT	SAMPLE TYPE ELEVATION (ft.) DEPTH (ft.)	USCS	SAMPLE TYPE KEY: Relatively undisturbed sample Disturbed sample Sample attempt with no recovery SPT split spoon sample DESCRIPTION	
	18 0- - - - - - - - - - - - - - - - - - -		Gravel	PID = 0 ppm PID = 0 ppm PID = 0 ppm

PROJECT: California Street Overcrossing

PROJECT NO: 04333-041-189

PROJECT LOCATION: Everett, WA

CLIENT NAME: Port of Everett

DATE STARTED: September 26, 2000

DATE COMPLETED: September 26, 2000
DRILLING CONTRACTOR: Cascade Drilling

DRILLER:

DRILLING METHOD: Geogrape

WATER LEVEL: ¥4.00 ft

ELEVATION: 18 ft

TOTAL DEPTH: 12.00 ft

WEATHER:

FIELD ENGINEER: B. Strickler

CHECKED BY: M. McCabe

LOG OF BORING UG-11

OVIAL FILE	G METHO	J. G	eopi	ope			, ,		· · · · · · · · · · · · · · · · · · ·
PRIVEN (In) FINES CONTENT (%)	DENSITY (pcf) MOISTURE CONTENT (%)	BLOWS PER FOOT	SAMPLE TYPE	ELEVATION (ft.)	оертн (п.)	SOSO	GRAPHIC SYMBOL	SAMPLE TYPE KEY: Relatively undisturbed sample Disturbed sample Sample attempt with no recovery SPT split spoon sample DESCRIPTION	
				-18 -	0-	GP	٠٥.	Gravel.	
			X	_	<u>▼</u>	SP		Brown to gray sand with some to trace silt and gravel. Faint odor.	PID = 0 ppm
			X	-13 -	5-			No odor	PID = 0 ppm
			X	-	-				PID ≃ 0 ppm
			X	- 8 -	10-			End of boring at 12 feet. Backfilled with bentonite. Groundwater	PID = 0 ppm
			:					at 4 feet bgs.	<u> </u>
;	į	:					:		
NOTES:									

PROJECT: California Street Overcrossing

PROJECT NO: 04333-041-189
PROJECT LOCATION: Everett, WA

CLIENT NAME: Port of Everett
DATE STARTED: September 26, 2000

DATE COMPLETED: September 26, 2000
DRILLING CONTRACTOR: Cascade Drilling

DRILLER:

DRILLING METHOD: Geoprobe SAMPLING METHOD: Geoprobe

WATER LEVEL: ¥4.00 ft

ELEVATION: 18 ft

TOTAL DEPTH: 12.00 ft

WEATHER:

FIELD ENGINEER: B. Strickler

CHECKED BY: M. McCabe

OAIV	APLIN	II ME	THO	U: G	eopr	obe					
SAMPLER DRIVEN (in)	CONTENT (%)	DENSITY (pcf)	MOISTURE CONTENT (%)	BLOWS PER FOOT	SAMPLE TYPE		OEPTH (ft.)	SOSO	GRAPHIC SYMBOL	SAMPLE TYPE KEY: Relatively undisturbed sample Disturbed sample Sample attempt with no recovery SPT split spoon sample DESCRIPTION	
					X	-13	5-	SP		Brown sand with trace silt and gravel. No odor. Some wood fragments.	P1D = 0 ppm P1D = 0 ppm
					X	8	10-	PT SP		Woody peat Brown sand with trace silt and gravel. End of boring at 12 feet. Groundwater at 4 feet bgs. Backfilled with bentonite.	PID = 0 ppm
:											
NOTES	S:									·	

URS

LOG OF BORING UG-12

SOIL BORING AND WELL INSTALLATION DATA SHEET

Boring ID: JP-1/JP-1a

Project	Informat	ion										Page 1 of 1
Project	Name:		Californ	ia Street	Overeros	sing	Location:	California	St and Fede	rai Ave		
Ртојеси	Task No.:		53-0433	3041.00	00056		Weather:	sunny, 60F	· 			
Drillin	g Informa	tion										<u> </u>
Date \$t			Thursda				Angulus Diam			2	inches	
	empleted:		Thursda		1, 2001	County Daily	Haznmer Weig			NA NA	lbs and	NA inches
Drilled Logged	•		Kasey C			of Cascade Drilling of URS	Sampler Type Approximate 3			NA NA	steel split spoor feet	<u> </u>
Checke	-		Dave Ra			of URS	Groundwater .			4	below ground :	surface
Dritting	Method:		Direct P				Total Depth:			13	below ground	surface
Dritt Ri	g Type:		Truck-n	ounted (eoProbe	· · · · · · · · · · · · · · · · · · ·	Backfill Mater	rial:		bentanite c	hips, asphalt pa	ı <u>ch</u>
Well In	stallation	Data				•						
Type of	Well Casi	ng:	NA				Top of PVC E	VC Elevation: NA				
Screen	Perforation	r	NA				Type/Thicken	ss of S ca ls:		NA		
ŧ	er of Well:		NA				Type of Sand	Pack:		NA		
Screene	d Interval:		NA			·						
Septh (feet)	Blaws per 6 inches	Penetration/ Recovery (inches)	E ine	USCS Classification	USCS Graphic	Material Description			Well Completion Diagram	PID Readings (ppm)	Samples	Remarks
0	. A . S			<u> </u>	<u> </u>	Asphalt, gravel road base.			201	A 5		REHEIRS
,					<u> </u>							
2		36/24		SM SP		Gray to brown Silt and fine Sand, some very angular Gray medium to coarse sand, mottled, moist.	fine Gravel, dr	γ.		1.61	JP1/1.5-4.5	Began sampling at 1.5'.
3						•						
1				MO.		Gray Silt and Clay, wood debris, moist.						
4		36/27	8:15	SM		Grading brown. Brown fine Sand and Sift, wet.				45	JP1/4.5-7.5	
5				MI.		Brown Silt and Clay, wet.						
6												
7		36/36	8:30	SM		Brown Sand and Silt with silty clay interbeds, gradin	ur black		JP1/7.5-10			
В		3030	0.50			province and one with only they intercess, grain	E DALEAS			15	11 13 13 10	
9												
10	·	36/12	8:45	SP		Brown medium to coarse Sand, medium soft, mottle	i, wet.			5		Refusal at 10' bgs. Moved 6.5' west and sampled 10 - 13'.
11												won and surpled to - 13.
12				:								
13					•*•••	BORING COMPLETED AT	13					
14												
15												
16												
17												
18												
19												
20					Li							<u></u>
NOTES		measured do	non hete	with over	r level !-	diestar		· · · - · ·				
Y .		measured do plack soil at 1			a igyel j[]	≚(caroi -						
n -						y clear water.						
Slight o	rganic odo	r in 10 - 13's:	апфіє. М	ot collect	ied for an	aysıs.						
Í												
<u> </u>												

SOIL BORING AND WELL INSTALLATION DATA SHEET

Boring ID: JP-2 Project Information Page 1 of 1 roject Name: California Street Overcrossing Location: California St and Federal Ave Project/Task No.: 53-04333041.00 00056 Weather: sunny, 60F **Drilling Information** Date Started: Thursday, June 21, 2001 Annulus Diameter: inches 2 Date Completed: Thursday, June 21, 2001 Hammer Weight and Drop: NΑ lbs and NA inches Drilled By: Kasey Gobie Cascade Drilling οf Sampler Type: 3' stainless steel split spoon ogged By: Kate Pineo URS Approximate Surface Elevation: NA fest hecked By: URS Dave Raubyogel Groundwater Level: below ground surface Drilling Method: Direct Push Total Depth: 6 below ground surface Dtill Rig Type: Truck-mounted GeoProbe Backfill Material: bentonite chips **Well Installation Data** Type of Well Casing: NA Top of PVC Elevation: NA creen Perforation: NA Type/Thickenss of Seals: NA Diameter of Well: NA Type of Sand Pack: NA Screened Interval: NA Penetration/ Recovery (inches) Well Completion Diagram Samples Material Description Remarks 9:15 Brown Silt and Clay, some fine Gravel, dry. JP2/0-3 Fine Sand and Silt, some fine Gravel, wet. 0 JP2/3-6 36/24 9:15 Grading brown fine to coarse Sand and fine Gravel, some Silt. Grading brown-gray fine Sand and Silt, some fine to coarse Gravel. Black fine Sand, saturated. BORING COMPLETED AT 6' NOTES: Groundwater level measured down-hole with water level indicator.

Logsek Date, 21s, 3P2

SOIL BORING AND WELL INSTALLATION DATA SHEET
Boring ID: _____ JP-3

Pro	ect Infor	metion				_									Page I of
Proj	ect Name:		Califor	nia Stree	et Overcro	ssing			Locatio	: n :	California	s St and Fed	ierai Ave		
Proj	ect/Task l	Yo.:	<u>53-043</u>	33041.0	0 00056				Weath	ef:	sunny, 60	F		_	
_	ling Infor	malion 	773.		21 2221			_							
t	Complete	ed-			21, 2001				-	s Diame			- 2	inches	
	ed By:		Kasey		21, 2002	of	Cascade De	illine	Sample		ht and Drop	p:	NA 2' strintess	_lbs and	NA inches
1	ed By:		Kate Pi			of	URS		-		urface Elev	vation:	NA NA	steel split spoo feet	л
Chec	ked By:		Dave R	aubvoge	!	_ of	URS		•	iwaier L			2.5	below ground	surface
ł	ing Metho		Direct !	Push					Total D	еріћ:			6	below ground	
Drill	Rig Type	:	Truck-	nounted	GeoProbe	<u></u>			Backfil	l Materi	al:		bentonite o	hips	
Well	Installati	ion Data													
	of Well C		NA						Top of	PVC Ele	vation:		NA		
Scre	n Perfora	tíga:	NA								of Seals:		NA.		
	neter of W		NA						Type of	Sand P	ack:		NA		
Scree	ned Inter	val:	NA	<u> </u>			 -								
<u>_</u>		>	Ţ	5	T	1					· · · ·		1 2	1 ''	1
Depth (fest)	<u>k</u>	Penetration/ Recovery (inches)		USCS Classification	و. ا	i						Well Completion Diagram	PID Readings (ppm)]	
捒	Blows	Penet Reco	i i	USCS	USCS Graphic]		Material Descripti	ian.			Vel.	5 E	Samples	
ō	<u> </u>	36/30	10:00	GP		Brown fine to	medium Send	and fine Gravel, dr	<u>у.</u>			704	8.5	JP3A0-3	Remarks
ĺ				ML		Brown-gray !	Silt and Clay, s	ome fine Gravel, day				}	ŀ		
1		1													
•		Ī										İ	1		
2		İ	1	İ									ļ		İ
														JP3/3-6	
3		36/36	10:00	SM		Brown fine S	and and Silt, w	<u></u>				┥ .			
-			.5.55	J			and Mid Oill, #	-4.					6	1F3/3-6	
						ĺ									
4															
	i					Ì									
5															
	:		1												
ا ۽								nic co							•
6							ВО	UNG COMPLETEE	O AT 6'.						
7			:												
8															
	ļ														
9	!														
1						!					<u> 1</u>				!
VOTE		el megazione	down hel	nejek s	niar laur	indicator		·····							
भ ०१म्म	uwaitf ICV	rei measured o	arawii-UOI	swill) W	KICI JE VČŠ	muica(or.									

SOIL BORING AND WELL INSTALLATION DATA SHEET
Boring ID: _____ JP-4

Pro	ect Infor	mation											Page 1 of
Proj	ect Name:		Califor	mia Stree	t Overer	ossing	Location:	Californi	a St and Fed	ierai Ave			
Proj	ect/Task l	ło.:	53-043	333041.00	0 00056		Weather:	sunny, 60)F				
	ing Infor	mation											
1	Started: Complete				21, 2001		Annulus Dian			2	inches		
	ed By:	ю.	Kasey	lay, June Goble	21, 2001	of Cascade Drilling	Hammer Weig		Þ:	NA.	_ lbs and	NA	inches
1	ged By:		Kate P			of Cascade Drilling of URS	Sampler Type Approximate:		vation:	NA NA	steel split spo feet	on	
1 "	ked By:			taubvoge	1	of URS	Groundwater		vanon.	- 107	below ground	t surface	
Drill	ing Matho	d:	Direct	Push			Total Depth:			10	below ground		
Drill	Rig Type:	:	Truck-	mounted	GeoProb	=	Backfill Mater	rial:		bentonite d	-		
W-D	Installati	D-14											
	of Well (N/A		•		*	•				·	
	n Perfora	-	NA NA				Top of PVC E			NA			
ł	eler of W		NA.				Type/Thickens Type of Sand I	•		NA NA			
	ned inter		NA				t yee ot dans			1174			
_	7			,									
牙	9	Penetration/ Recovery (inches)		USCS Classification	1				 	PID Readings (ppm)			
Depth (feet)	Blows per inches	ietrat Sover		N gg	USCS				Well Completion Diagram	2 gg 2			
	Blor inch	2 % £	Ě		USCS	Material Description			* 9 g	Ð.	Samples		Remarks
0		36/24	10:30	GP		Brown-gray fine Sand and Gravel, dry				280 - 300	JP4/0-3	Odor.	-
				5M		Gray fine Sand and Silt, some fine Gravel, dark gray	ash/sinder layer	r, dry.	1				
1			ĺ	1					į				
												1	
			i	1									
2									Ì				•
						Grading brown fine Sand and Silt, little coarse Grave	. 1.						
3		36/12	10:45	SP		<u>L.</u> .						İ	
		3012	10.43	31		Brown fine to coarse SAND, little coarse Gravel, we	<u> </u>		1 i	270	JP4/3-6	Odor.	
												}	
4									!				
				l									
												İ	
5					3.7								
									! !			•	
6	-					No sample collected.						i	
Ī			i										ļ
7]								į					
		Ī											
8		24/7	10:50	SM		Gray medium Sand and Silt, wet. Red-brown wood o	ebris noted		:	5.3	JP4/8-10		
	ľ	!						j	i		** ***]	
	ľ									- 1		İ	
9		[1							j		İ	
-		l								- 1			
				!	!!!!!![]	BORING COMPLETED AT	EC'.		l	<u> i</u>		<u> </u>	
NOTE													
		el measured d ipie JP4/GW				indica(or.							
, outil	. water San	₩.C 1E4/CJYY	-oneried	.a10∷0Ü									Į.
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													!

SOIL BORING AND WELL INSTALLATION DATA SHEET
Boring ID: _____ JP-5

Proj	ect Infort	retion										Page 1 of 1
Proj	ect Name:		Catiforn	nia Street	Overcros	ssing	Location:	California	St and Fed	eral Ave		
Ртој	ct/Task N	io.:	53-043	33041.00	00056		Weathern	sunny, 601	F			
D-11	r						·				-	
	ing Inford Started:	mation.	Threed	[. 2001		Annulus Dian			2	inches	
1	Complete	d:		ay, June 2 ay, June 2			Hammer Weig			NA NA	inches Ibs and	NA inches
	ed By:	-	Kasey (., 2001	of Cascade Drilling	Sampler Type	-	•		steel split spoot	
	ed By:		Kate Pis			ef URS	Approximate		ration:	NA	feet	
Chec	ked By:		Dave R	aubvogei		of URS	Groundwater			2	below ground:	surface
Drill	ing Metho	d;	Direct P	ush			Total Depth:			6	below ground:	surface
Drill	Rig Type:		Truck-n	nounted (GeoProbe	:	Backfill Mate	rial:		bentonite c	hips	
Well	Installati	on Data										
Туре	of Well C	asing:	NA				Top of PVC E	levation:		NA	<u> </u>	
Scree	n Perforat	tion:	NA				Type/Thicken	ss of Seals:		NA		· · · · · · · · · · · · · · · · · · ·
	eter of We		NA	···-		<u></u>	Type of Sand	Pack:		NA		
Scree	med Interv	/al:	ŊĄ				····					·
٥	٠	Ē	-	<u>g</u>	Ţ		-		₽	8.8°		
Depih (fect)	Blows per 6 inches	Penetration/ Recovery (inches)		USCS Classification	_ =				Well Completion Diagram	PID Readings (ppm)		
듗	How	Reco	Time.	JSCS Jassi	USCS Graphic	Materiał Description			Diag.	PLO R	Samples	Remarks
ō	<u> </u>	36/36	11:05	SM		Light gray fine Sand and Silt, some coarse Gravel, dr	у.			4.3	JP5/0-3	North Ed
				1					i			·
1				MI.		Dark gray SB T and coarse Grayet			[
Ĺ						Dark gray SILT and coarse Gravet						
		36/22	11:10	SM		Brown dense fine Sand and Silt, wet, grading gray.				1.5		
2]			•
3				i		Grading brown.				5.3	JP5/3-6	
1						Columning of Owner				3.3	31 33-0	
4												
					1							
5			l									
				SP		Black fine to medium Sand and Gravel.		:				
. 6	:					BORING COMPLETED AT	6.					
	,									- 1		
7												
										ļ		
8												
9												
]		
			لــــا			<u> </u>						<u> </u>
NOTE	iS:											
		el measured	down-hol	e with wa	ater level	indicator.			-			
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SOIL BORING AND WELL INSTALLATION DATA SHEET
Boring ID: IP-6

Proj	ect Infor	mation										Page 1 of
Рюј	ect Name:	-	Califor	nia Stree	t Overere	ossing		Location:	California St and Fed	ietal Ave		. <u></u>
Proj	ecvTask N	√o. :	53-043	3304 E.0K	00056			Weather:	surmy, 60P			
Dritt	ling Infor	mation					_	•			•	· • • • • • • • • • • • • • • • • • • •
_	Started:		Thursd	ay, June	21, 2001			Annulus Diam	elet:	2	inches	· <u>·</u>
Date	Complete	ed:		ay, June			·	Hammer Weig		NA.	- los and	NA inches
Drill	ed By:		Kasey (Goble		of Cascade	Drilling	Sampler Type:	=		– s steel split spac	
	ed By:		Kate Pi			of URS		Approximate 5	Surface Elevation:	NA	feet	
	ked By:			aubvogel	<u> </u>	of URS		Groundwater I	evel:	2	_below ground	surface
	ing Metho Rig Type:		Direct i	nounted (GenPmby	<u></u>		Total Depth: Backfill Materi	. .	9	_below ground	surface
<u> </u>	0.77		-			·		Dacktill Matet		bentonite	cnips	
	Installati							. .				
	of Well C	-	NA			_ 	 	Top of PVC El		NA	· .	
	n Perforat eter of Wo		NA NA					Type/Thickens		NA		<u></u>
	ned Interv		NA.					Type of Sand P	ack:	<u>NA</u>		
		1	ī ·-		1	T			· · ·			
(eet)	per 6	Penetration/ Recovery (Inches)	ĺ	USCS Classification					ig _	PID Readings (ppm)		
Depth (feet)	Blows p	inelia acove	Į.	SS	USCS Graphic				Well Completion Diagram	2 E	1	
0		36/24	11:50	SM.	55 	Gray-brown fine Sand an	Material Descripti d Siit, some coasse Gra	on Wel, mottled, dry	≱ប៉ដ	4.3	Samples JPS/0-3	Remarks
		ļ										
1												
										ļ		
				•]	
2						j						
3		36/6	11:50			Grading wet.				14		Poor recovery.
4												
									ļ			
ا ۔												
5												
-		i										
6	- 1	36/18	11:50			Grading peat noted.				t.5	JP5/6-9	
ı	ļ											
7												
8						•						
9		l	ĺ			В	ORING COMPLETED	AT 9'.	i			
_1	<u>l</u>										·	1
OTE:		el measured (lown-bole	with un	ter laval	indicator				<u></u>		
		n=eodtsu (***************************************	nn W3		marcator,						
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SOIL BORING AND WELL INSTALLATION DATA SHEET

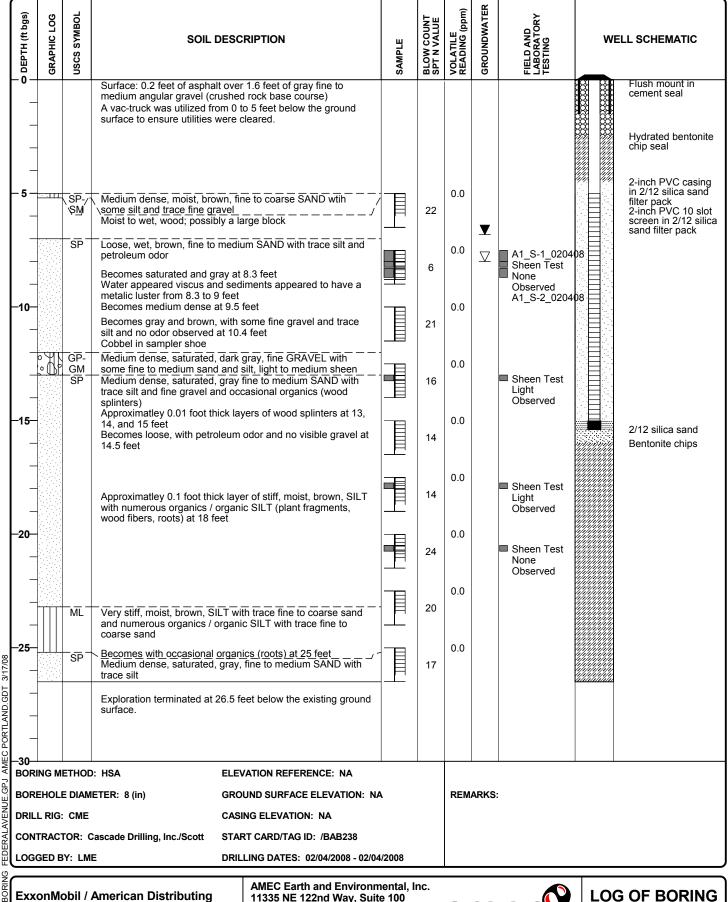
	~	01415	1
Boring I	D:	JP-	7

•	<i>J</i> 3,1	4.0										Boring ID: JP-
Proj	ect Infoir	eation										Page 1 of
Proje	eci Name:		Califor	nia Street	t Overcro	ssing	Location:	California	St and Fed	eral Ave		· · · · · · · · · · · · · · · · · · ·
Proje	eci/Task N	lo.:	53-043	33041.00	00056		Weather:	sunny, 60l				
Dei1	lles lessen											
	ling Inford Started:	RETURN	Thursda	ay, June 2	21. 2D01	· · · · · · · · · · · · · · · · · · ·	Annulus Dia	meter		2	inches	<u> </u>
	Complete	el:		ay, June 2				eight and Drop	r	NA NA	lbs and	NA inches
	ed By:		Kasey (of Cascade Drilling					steel split spor	
Logg	ed By:		Kate Pi	пео		of URS		e Surface Elev	ation:	NA	feet	
	ked By.		Dave R	aubvogel		af <u>URS</u>	Groundwate	r Level:		2 below ground surface		
l .	ing Metho		Direct F				Total Depth			9 below ground surface		surface
Drill	Rig Type:		Truck-n	nounted (GeoProb	: 	Backfill Ma	terial:		bentonite o	hips	
	Installati											
	of Well C	•	NA				Top of PVC			NA .		
	en Perforat Seies of We		NA					enss of Seals:		NA	<u>.</u>	
	ned interv		NA NA			*	Type of San	d Pack:		ŅA		· · · · · · · · · · · · · · · · · · ·
								· · · · · · · · · · · · · · · · · · ·			 	
ନ୍ତ	و [è.		ē					8	silu.		
Oepth (feet)	Blows per inches	urath overy	١	Siffea	S #				and detail	Read		
ā	Blows	Penetration/ Recovery (inches)	Time	USCS Classification	USCS Graphic	Ma Ma	aterial Description		Weil Campletion Diagram	PID Readings (ppm)	Samples	Remarks
o		36/30		SM		Light brown fine Sand and Silt.	some fine Gravel, dry.				:	Odor.
										75	JP7/1-2	
ı			1			Grading dark gray.				20	JP7/2-3	
				<u> </u>								
2				SP		Brown fine to medium Sand, littl	e coarse Gravel, wet.		:			
3		36/0										No recovery.
				[•		
4												
						}						
5							•					
1				1								
_		3604	*****			C-4		i				
6	:	36/24	12:20			Grading brown fine to medium S	and.			9	JP7/6-9	
						İ				į		
7												
В			l i									
•												
9				_	1	BORING	COMPLETED AT 9.					
			<u> </u>		!	<u> </u>						<u> </u>
NOTE			J b1									
		rel measured reple JP7/GV				нкисают.						

	Project No.: 31174 Boring: MW20 Plate: 1 OF 1					
ERI ENVIRONMENTAL	Site: Former Mobil Oil Terminal 46-108 Date: 07/03/0	<u>_</u>				
RESOLUTIONS, SIC.	Drill Contractor: Cascade Drilling, Inc. of Woodinville, WA	_				
Sample Method: None Geologist: Antonio Luna						
Drill Rig: CME-55	Bore Hole Diameter: 8" Signature:	_				
in gravel nex	Location: Southwest corner of property Registration: in gravel next to Federal Avenue. Logged by: Antonio Luna					
/30/////////		7				
1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	GEOLOGIC DESCRIPTION	\$ ²				
	Removed steel well and point, backfilled with bentonite, capped with 1 foot of cement					
-5-						
	Total depth, 5 feet below ground surface					
		N/A				
		Grout:				
		 				
		2				
		Ü				
		Size:				
		Sand				
		, to				
		∢				
		Size:				
		Slot				
		-				
		∢				
		×				
		er:				
		Diameter				
		Dia				
		Casing				
FN: 3117480020						

	Project No.: 31174 Boring: MW21 Plate: 1 (ጉም 1				
	Site: Former Mobil Oil Terminal 46-108 Date:	20\ 20\ c0				
ENVIRONMENTAL RESOLUTIONS, INC.	Drill Contractor: Cascade Drilling, Inc. of Woodinvill	e. WA				
Sample Method: None	Sample Method: None Geologist: Antonio Luna					
	Bore Hole Diameter: 10" Signature:					
Location: Southwest con	mer of property Registration:					
in gravel nex	t to Federal Avenue. Logged by: Antonio Lu	na				
	GEOLOGIC DESCRIPTION	13 E				
	GEOLOGIC DESCRIPTION	RELY CO.				
	Removed schedule 40 PVC well casing,	77777				
	overdrilled to remove seal and sand pack,					
	backfilled with bentonite,	1				
	capped with 1 foot of cement					
-5-						
[]						
	Total depth, 6 feet below ground surface					
		N/A				
		4 1				
		Grout:				
		Į į				
		٥				
		l i				
		₹				
		X				
		Size:				
		1				
		Sand				
		1 22				
		1 i				
		₹				
		2				
		;!				
		Size:				
		Slot				
		.				
		 *				
 		N				
		Diameter:				
	·	Jet				
		la l				
		Casing				
		asi				
		١٥				
FN: 34174B0021						

						
	Project No.: 31174 Boring: Unknown Plate: 1 (<u>)F 1</u>				
Site: Former Mobil Oil Terminal 46-108 Date: 07/03/02						
Drill Contractor: Cascade Drilling, Inc. of Woodinville, WA						
Sample Method: None	Sample Method: None Geologist: Antonio Luna					
Drill Rig: CME-55	Bore Hole Diameter: <u>10"</u> Signature:					
Location: Southwest cor	ner of property Registration:					
	to Federal Avenue. Logged by: Antonio Lu	na				
(E) / . / / .	77					
1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	GEOLOGIC DESCRIPTION	(A) (B)				
1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	GEOLOGIC DESCRIPTION	ALL THE STATE OF T				
	Well overdrilled to remove well casing,	77777				
	seal, and sand pack, backfilled with bentonite,	(.]././././				
	capped with 1 foot of cement	1				
-5-						
	Total depth, 6 feet below ground surface					
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ExxonMobil / American Distributing Company

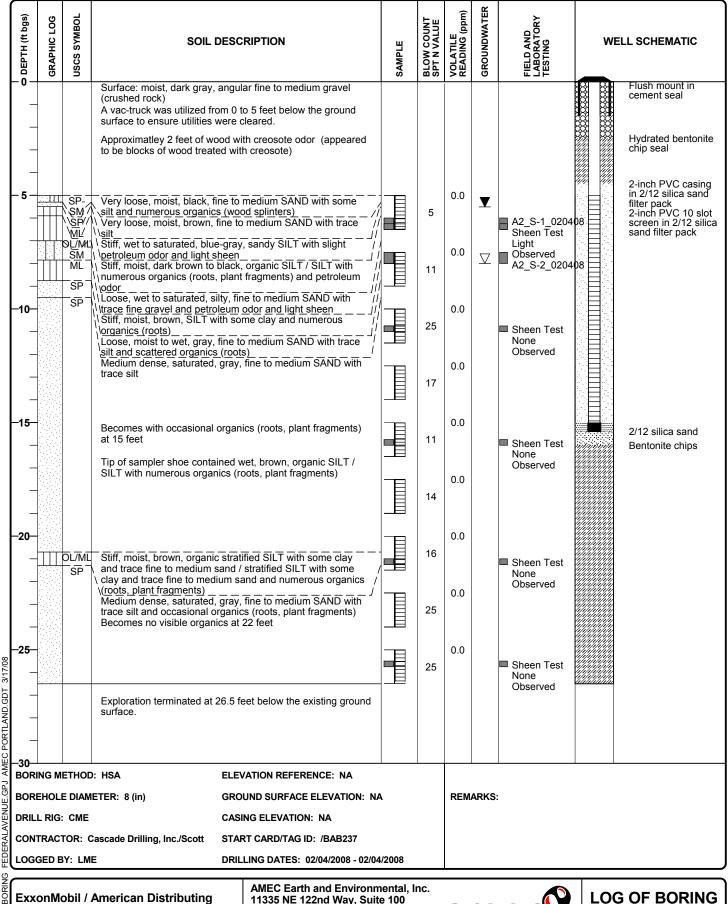
7-915-15716-B

AMEC Earth and Environmental, Inc. 11335 NE 122nd Way, Suite 100 Kirkland, Washington USA 98034 Tel (425) 820-4669

Fax (425) 821-3914



LOG OF BORING MWA1



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7-915-15716-B

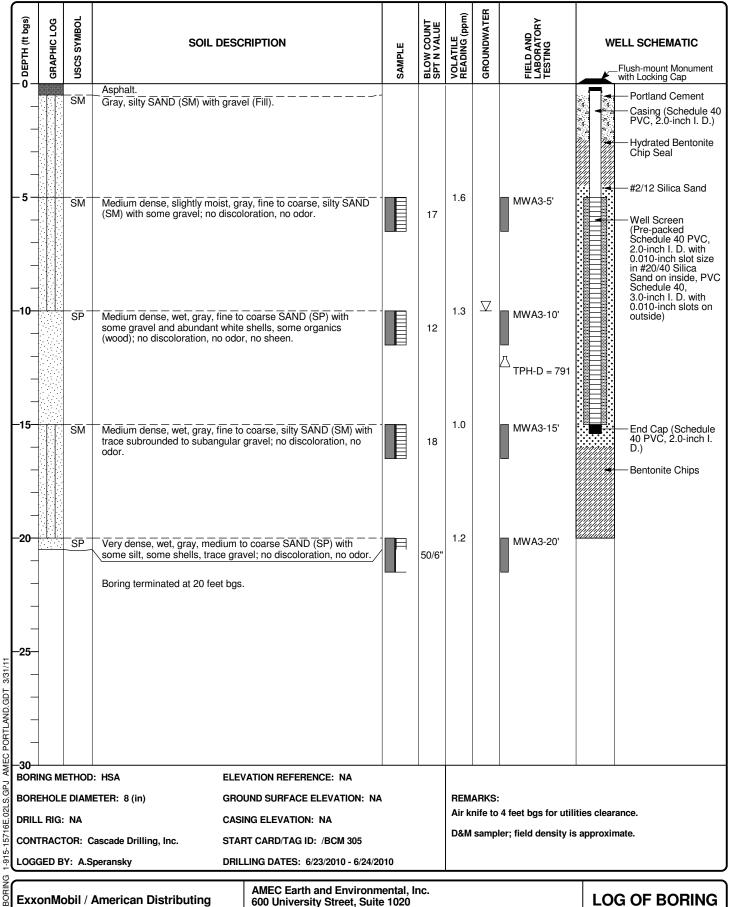
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LOG OF BORING MWA2

AGENCY DRAFT



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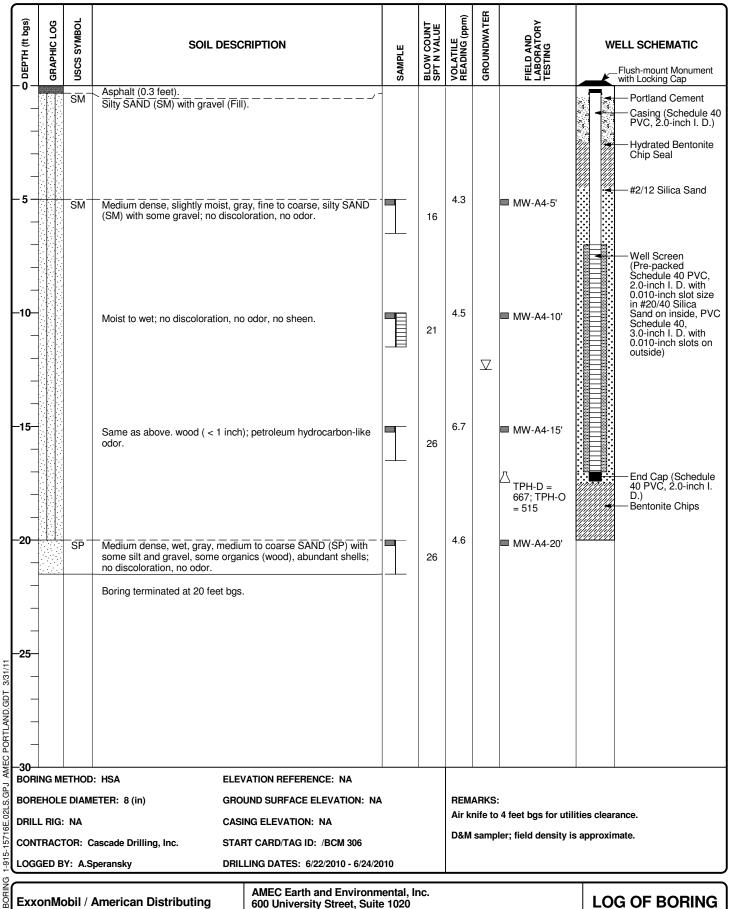
1-915-15716E

600 University Street, Suite 1020 Seattle, Washington USA 98101 Tel (206) 342-1760 Fax (206) 342-1761



LOG OF BORING MW-A3

AGENCY DRAFT



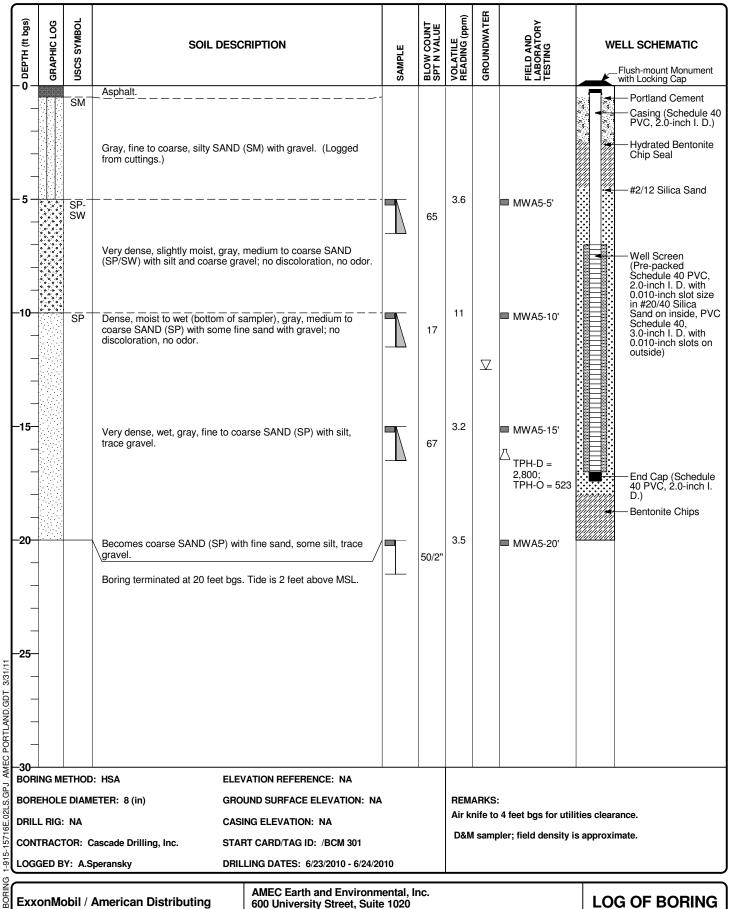
ExxonMobil / American Distributing Company

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LOG OF BORING MW-A4



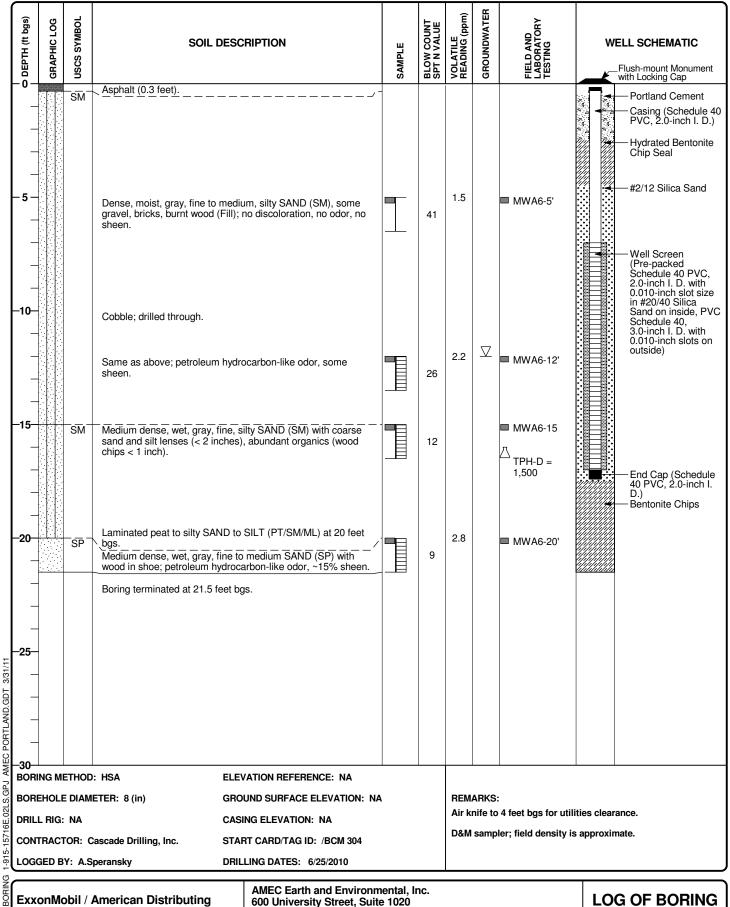
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LOG OF BORING MW-A5



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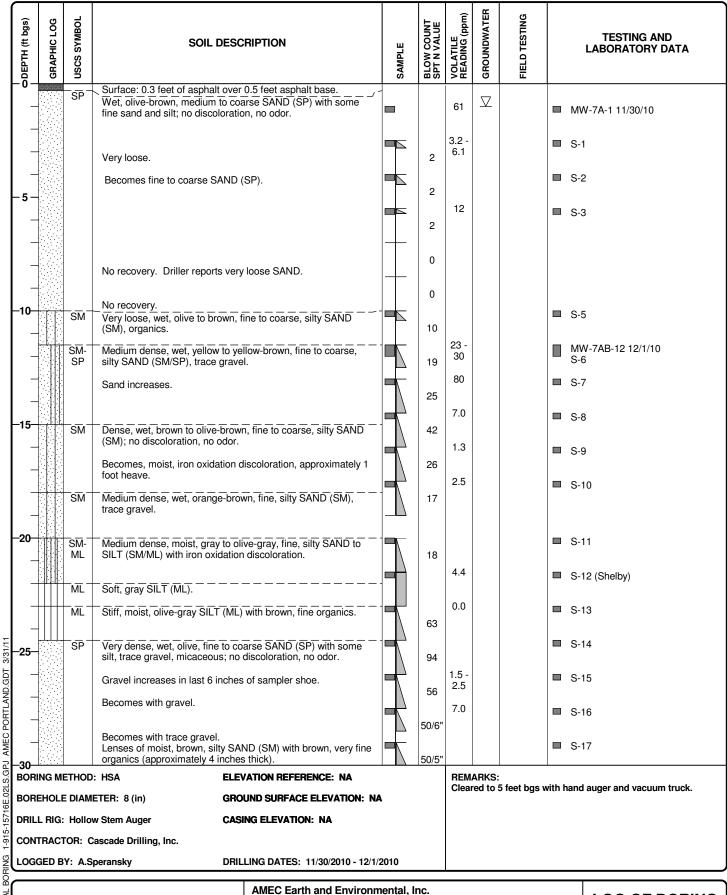
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LOG OF BORING MW-A6

DEPTH (ft bgs)	GRAPHIC LOG	USCS SYMBOL	SOIL DESC	CRIPTION	SAMPLE	BLOW COUNT SPT N VALUE	VOLATILE READING (ppm)	GROUNDWATER	FIELD AND LABORATORY TESTING	WELL SCHEMATIC Flush-mount Monument with Locking Cap
-5	15	35	No samples collected, for lithology AB boring log. Boring terminated at 15 feet bgs		76	18	N BI	15	IFI LLA TT	with Locking Cap Portland Cement Casing (Schedule 2 PVC, 2.0-inch I. D.) Medium Bentonite Chips #2/12 Silica Sand Well Screen (Pre-packed Schedule 40 PVC, 2.0-inch I. D. with 0.010-inch slot size in #20/40 Silica Sand on inside, PV Schedule 40, 3.0-inch I. D. with 0.010-inch slots on outside) End Cap (Schedule 40 PVC, 2.0-inch I. D.)
-30-BORIN	IG ME	ETHOD	: HSA ELEY	VATION REFERENCE: NA						
BOREI DRILL	HOLE RIG:	DIAMI Hollov	ETER: 8 (in) GRO w Stem Auger CAS	UND SURFACE ELEVATION: NA ING ELEVATION: NA RT CARD/TAG ID: /BLT 570			REMA	ARKS:		
				LING DATES: 12/2/2010				_		
Exxo Comp	pany	/	American Distributing	AMEC Earth and Environm 600 University Street, Suite Seattle, Washington USA 98101 Tel (206) 342-1760 Fax (206) 342-1761	ental, li e 1020	nc.		an	nec [©]	LOG OF BORING





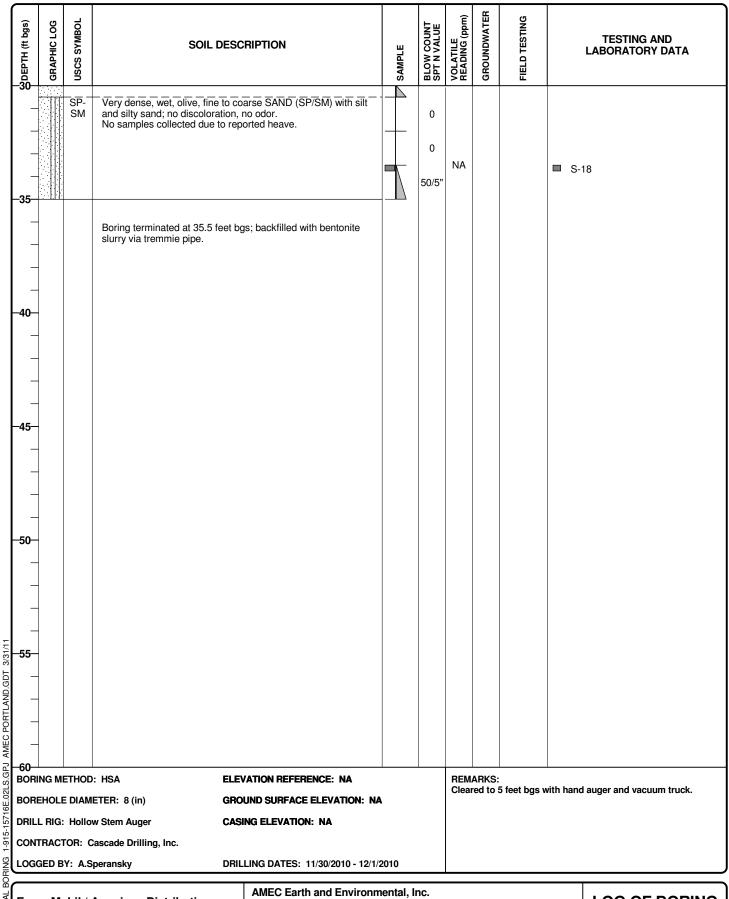
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LOG OF BORING MW-7AB



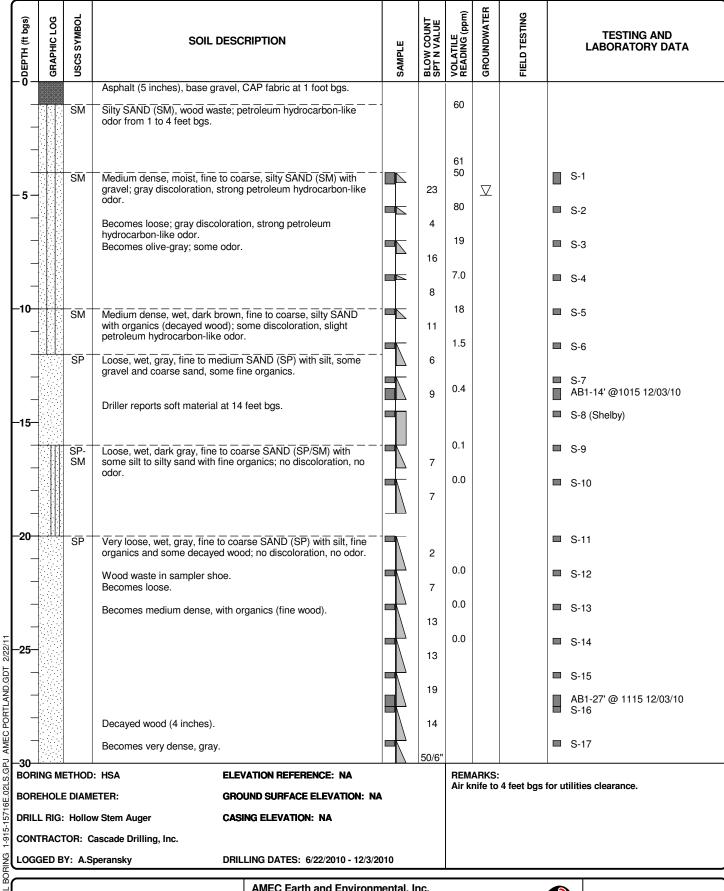
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LOG OF BORING MW-7AB



1-915-15716E

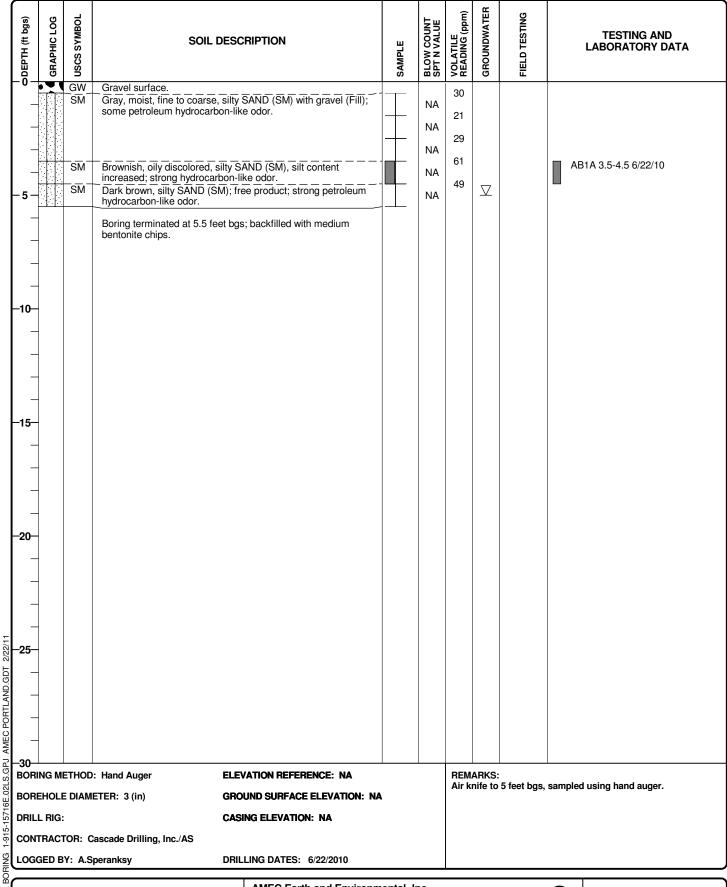
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LOG OF BORING AB-1

р Фрертн (ft bgs)	GRAPHIC LOG	USCS SYMBOL	SOIL DESCR	RIPTION	SAMPLE	BLOW COUNT SPT N VALUE	VOLATILE READING (ppm)	GROUNDWATER	FIELD TESTING		TESTING AND LABORATORY DATA
-30-		SP	Very loose, wet, gray, fine to coars organics and some decayed wood	se SAND (SP) with silt, fine I; no discoloration, no odor.						■ S-	18
-	-		Wood (last 6 inches of sampler). Wood (last 6 inches).			19				■ S-	19
-	-	SM	Loose, wet, olive-brown, fine to m brown, fine gravel, some dark bro	edium, silty SAND (SM) with	1	8				_ 0	
-	- 1	SP- SM	Medium dense, wet, gray, fine to r silt to silty sand, some fine gravel.	medium SAND (SP/SM) with		19					
- 35-											
-			Boring terminated at 35 feet bgs; I slurry via tremmie pipe then patch	packfilled with bentonite led with concrete on top.							
-											
-40-											
~											
-											
-											
-45											
-											
-											
-											
-											
-5 0-											
55 <u>-</u> 25/11											
AND.G											
PORTL	-										
AMEC PORTLAND.GDT	-										
ਰੂ -60	RING MI	ETHOD	: HSA FIEW	ATION REFERENCE: NA			REM	ARKS:			
BOE	DRING METHOD: HSA DREHOLE DIAMETER:			IND SURFACE ELEVATION: NA	١					for utiliti	ies clearance.
2716 DRI	RILL RIG: Hollow Stem Auger			IG ELEVATION: NA							
-	ONTRACTOR: Cascade Drilling, Inc.										
$\overline{}$	OGGED BY: A.Speransky			ING DATES: 6/22/2010 - 12/3/2	010						
Co	ExxonMobil / American Distributing Company			AMEC Earth and Environn 11810 North Creek Parkwa Bothell, Washington USA 98011	nental, li ny N	nc.	ə 1	n	eď	9	LOG OF BORING AB-1
1-9	915-15716E			Tel (425) 368-1000 Fax (425) 368-1001							PAGE 2 OF 2



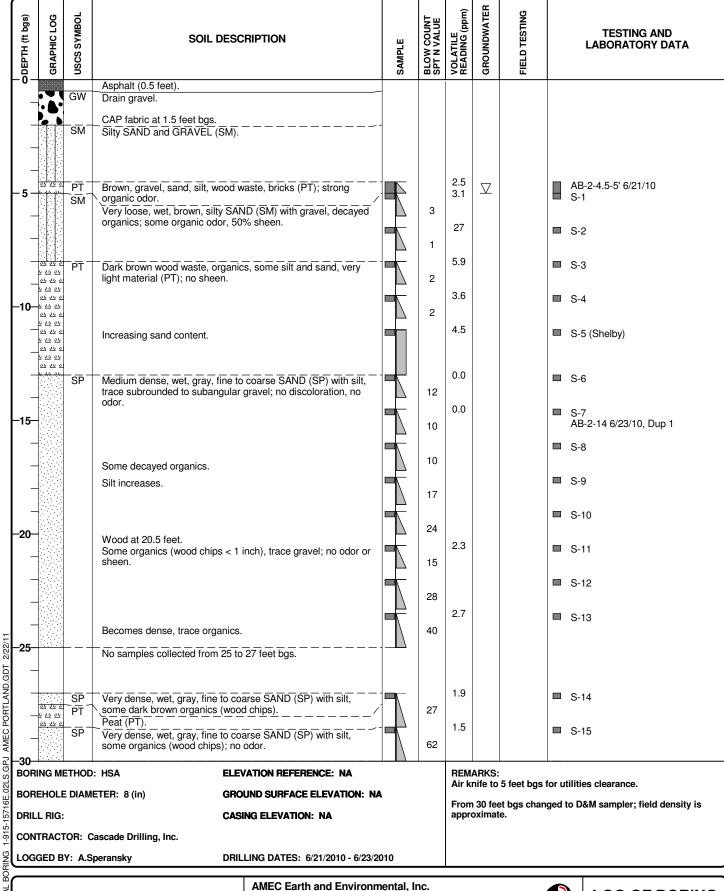
1-915-15716E

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LOG OF BORING AB-1A



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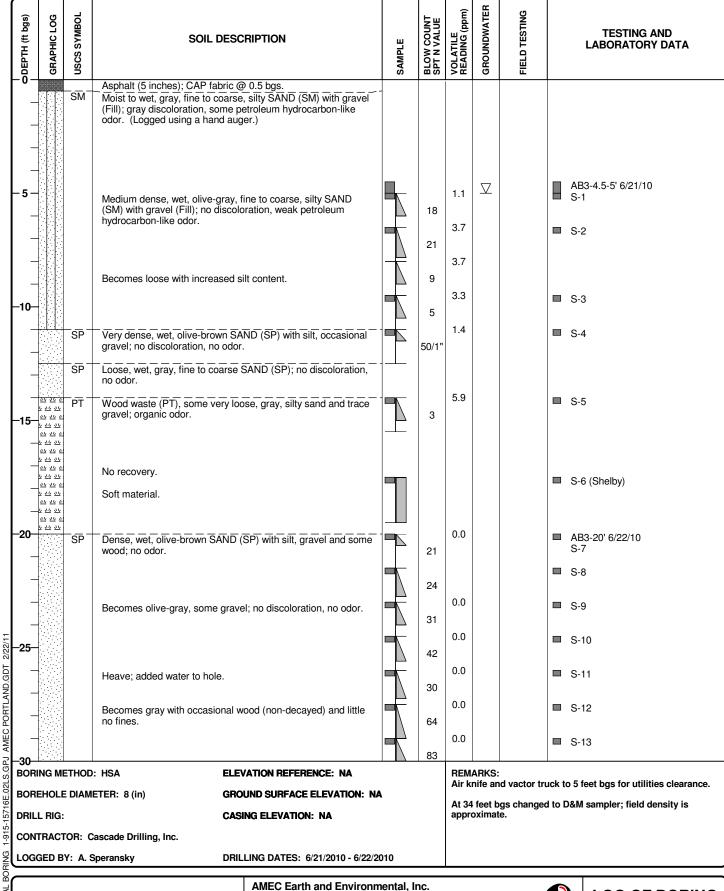
Fax (425) 368-1001

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LOG OF BORING AB-2

Spepth (# bas)	(ega ii) iii aga)	GRAPHIC LOG	USCS SYMBOL	SOIL DES	CRIPTION	SAMPLE	BLOW COUNT SPT N VALUE	VOLATILE READING (ppm)	GROUNDWATER	FIELD TESTING		TESTING AND LABORATORY DATA
-3	0 -		SM	Dense, wet, brown, fine to coar organics (wood > 2 inches thick some gravel. Changed to D & M sampler at 3 Heaving sand.			37	1.1				
			SM	Dense, wet, yellow-brown, fine with coarse sand, some gravel	to medium, silty SAND (SM) no odor.		34	0.6			■ 8	G-18
-3	5-		SP	Very dense, wet, olive-grey, me little to no fines, some gravel.	edium to coarse SAND (SP),		51				■ 8	3-19
			SM	Very dense, wet, yellow-brown, (SM) with coarse sand, some g	fine to medium, silty SAND ravel; no odor.		65				■ S	3-20
							72 50/6"	0.7			S	3-21
AMEC PORTLAND.GDT 2/22/11	5- - - - - - -	EX LX		Boring terminated at 40 feet bg bentonite chips and capped wit	s; backfilled with medium h concrete patch.							
GPJ AME	-		-TUOD						, DIVO			
2L8			THOD DIAMI		EVATION REFERENCE: NA OUND SURFACE ELEVATION: NA	A		Air kr		5 feet bgs		ities clearance.
-15716E				SING ELEVATION: NA				30 fee		ged to	D&M sampler; field density is	
	CONTRACTOR: Cascade Drilling, Inc. LOGGED BY: A.Speransky			ILLING DATES: 6/21/2010 - 6/23/2	010							
ONMENTAL BORI	ExxonMobil / American Distributing Company 1-915-15716E			AMEC Earth and Environn 11810 North Creek Parkwa Bothell, Washington USA 98011 Tel (425) 368-1000 Fax (425) 368-1001	nental, lı	nc.	AB-2			LOG OF BORING AB-2 PAGE 2 OF 2		





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LOG OF BORING AB-3



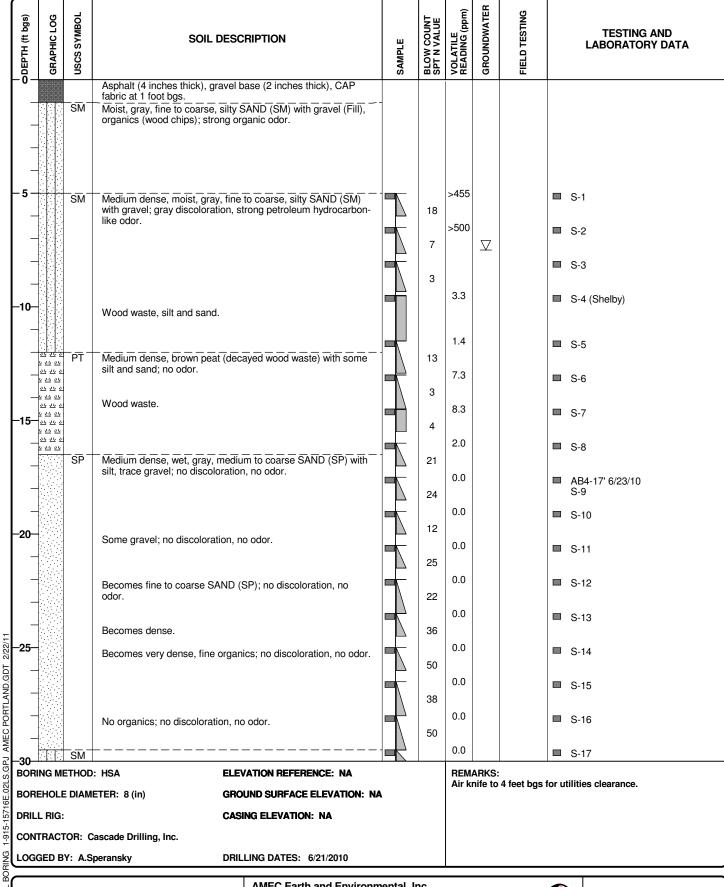
1-915-15716E

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LOG OF BORING AB-3



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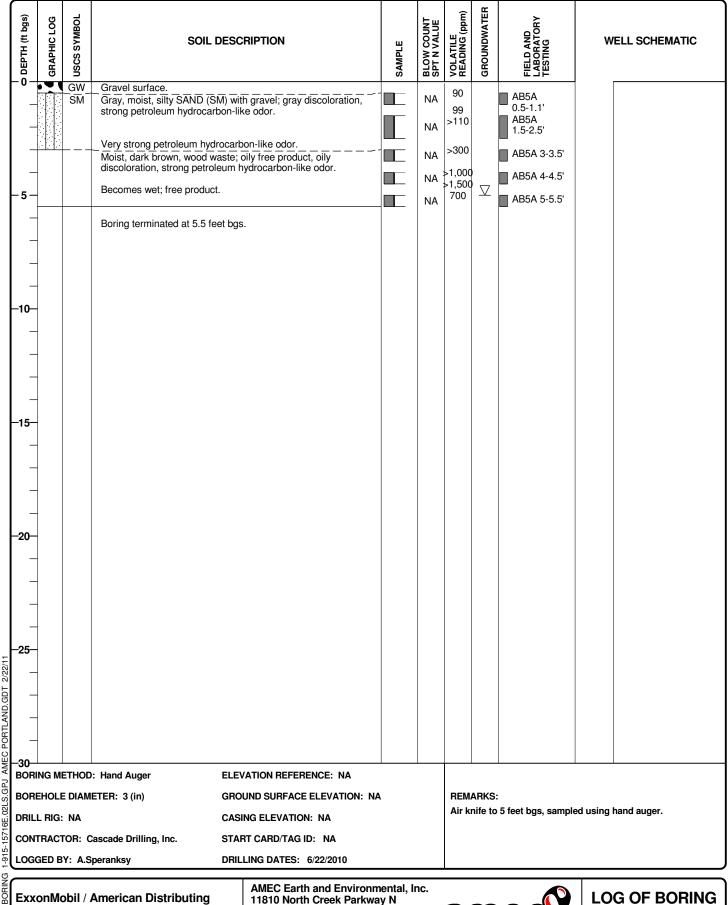
LOG OF BORING AB-4

р В ОЕРТН (ft bgs)	GRAPHIC LOG	USCS SYMBOL	SOIL DESCRIPTION	ON	SAMPLE	BLOW COUNT SPT N VALUE	VOLATILE READING (ppm)	GROUNDWATER	FIELD TESTING	ı	TESTING AND LABORATORY DATA
-30-		SM	Dense to very dense, wet, yellow-brown coarse, silty SAND (SM) with trace sub-	n, fine to medium rounded gravel,		61	0.0				
			micaceous. Becomes dense, olive-gray, fine, silty S	AND (SM) with some		31	0.0			■ S-18	3
_		ML	medium sand. Stiff, moist, gray SILT (ML), some fine s gravel, slightly plastic, iron-oxide stainir	sand with clay, trace			0.0			■ S-19	9
		SP				31				■ S-19	9A
-35-		51	Very dense, gray, fine to coarse SAND discoloration, no odor.	(SP), little lines; no		61				_ 0-20	S
-40- - -45-			Boring terminated at 35.5 feet bgs. Backfilled with medium bentonite chips	concrete patch at top.							
- - -50-											
-											
_											
- 55	-										
AMEC PORTLAND.GDT 2											
MEC PC											
ਫ਼ੂ –60–											
DOLS		ETHOD		REFERENCE: NA				ARKS: nife to	4 feet bgs	for utilitie	s clearance.
16E	EHOLI .L RIG:		,	URFACE ELEVATION: NA EVATION: NA	4						
5-1			ascade Drilling, Inc.	EVAIION. NA							
E LOG	-			ATES: 6/21/2010							
Cor Exx	ExxonMobil / American Distributing Company 1-915-15716E			C Earth and Environm 0 North Creek Parkwa nell, Washington 98011 (425) 368-1000 (425) 368-1001	nental, li ay N	nc.	Ə 1	ກ	ec	9	LOG OF BORING AB-4 PAGE 2 OF 2



 	GRAPHIC LOG	USCS SYMBOL	SOIL DESCRIPTION	SAMPLE	BLOW COUNT SPT N VALUE	VOLATILE READING (ppm)	GROUNDWATER	FIELD TESTING		TESTING AND LABORATORY DATA
-0-			Asphalt (6 inches thick), rock drain beneath, CAP fabric at 1 foot bgs.							
		SM	Moist, gray, silty SAND (SM) with fine to coarse gravel (Fill); strong petroleum hydrocarbon-like odor, sheen.							
			and ig positions in joint and accept and in			4.4				
			Becomes moist; very strong petroleum hydrocarbon-like odor; 50% sheen; oily.			30				
-5-		SM	Wet wood waste, bricks, silty SAND (SM) mixture (Fill); oily; 100% sheen.		10	>100	∇			AB5-5' 6/25/10 S-1
-	示 7 7 77 7 77	SM- PT	Very loose, wet, brown, fine to coarse, silty SAND (SM), with organics (peat); 100% sheen.		3	125				S-2
-	77 77 77 77 77 77		Trace gravel.			400				S-3
-10-	7 元 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7		Very loose, wet, gray, silty SAND (SM), wood waste; strong petroleum hydrocarbon-like odor, 75% sheen.		2	>200				S-4
	7 元 7 元 7 元 7 元		Wood waste, some gray sand.		2					S-5 (Shelby)
4	77 77 77 77 77 77 77 77 77	PT	Becomes loose, wood waste (PT); strong petroleum hydrocarbon-like odor, sheen.		9	75.7			-	S-6
-15- ¹	40 40 40 5 40 40 40 40 40 5 40 40				13	>200				S-7
<u>.</u>	77 77 77 77 77 77 77 77 77				11	>200				S-8
: ;	40 40 40 5 40 40 40 40 40 5 40 40		Very strong petroleum hydrocarbon-like odor, 100% sheen.		8	>200				S-9
-20-	2 22 22	SM	Medium dense, wet, gray, fine to coarse, silty SAND (SM).		11	321				S-10
		SP	Medium dense, wet, yellow-brown, fine to coarse SAND (SP) with silt and some organics (wood); slight petroleum hydrocarbon-like odor, 25% sheen.		12	9				S-11
		SM	Dense, wet, olive-brown, fine to coarse, silty SAND (SM); no discoloration, no odor.		26	3.8				AB5-22' 6/25/10 S-12
4			Becomes loose.		9	3.5				S-13
-25-			Becomes medium dense, trace gravel, trace organics (< 1		30	4.2				S-14
7			inch). Trace to some gravel; no discoloration, no odor.			3.2				S-15
			-		26	5.2				S-16
-			Becomes dense, fine organics.		34					S-17
-30- ¹ BORII	NG ME	ETHOD:	HSA ELEVATION REFERENCE: NA		<u> </u>	REMA	ARKS:	<u> </u>		<u> </u>
		DIAME		١		feet b	gs. A	t 31 feet bg		oles collected using hand auger to to nged to D&M sampler; field density
DRILL	. RIG:		CASING ELEVATION: NA			is ap	proxin	nate.		
CONT	RACT	OR: C	ascade Drilling, Inc.							
LOGG	ED B	Y: A.S _l	peransky DRILLING DATES: 6/25/2010							
Exxo			American Distributing American Distributing American Distributing American Distributing 11810 North Creek Parkwa Bothell, Washington USA 98011		nc.	aı	ຠ	eď	9	LOG OF BORING AB-5
		716E	Tel (425) 368-1000					_		1

GRAPHIC LOG	1	DESCRIPTION	SAMPLE	BLOW COUNT SPT N VALUE	VOLATILE READING (ppm)	GROUNDWATER	FIELD TESTING		TESTING AND LABORATORY DATA
-35-	discoloration, no odor. Heave. D&M sampler at 31 feet bg	to coarse, silty SAND (SM) with		37 44 50/4" 59					S-18 AB5-35' 6/25/10 S-19
-40- -45- -50- -50-	Boring terminated at 35.5 f Boring backfilled with medi patch at surface.	eet bgs. um bentonite chips and cement							
BORING TO BOUND BORING TO BOUND BORING METHOLOGIC BORILAND GDT BOUND BORING METHOLOGIC BOUND BORING METHOLOGIC BOUND BOUND BORING METHOLOGIC BOUND BOU	AMETER: Cascade Drilling, Inc.	ELEVATION REFERENCE: NA GROUND SURFACE ELEVATION: NA CASING ELEVATION: NA DRILLING DATES: 6/25/2010	A		feet b	ife to	5 feet bgs, t 31 feet bg	samp s cha	oles collected using hand auger to 5 nged to D&M sampler; field density
_	/ American Distributing	AMEC Earth and Environn 11810 North Creek Parkwa Bothell, Washington USA 98011 Tel (425) 368-1000 Fax (425) 368-1001	nental, l	nc.	ə r	ກ	eď	9	LOG OF BORING AB-5 PAGE 2 OF 2



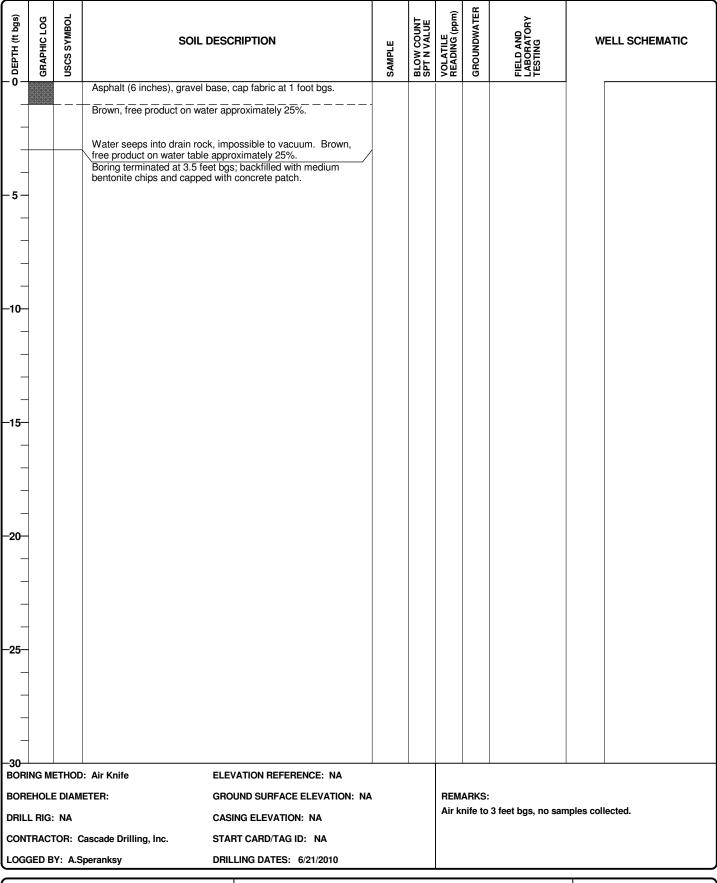
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LOG OF BORING AB-5A



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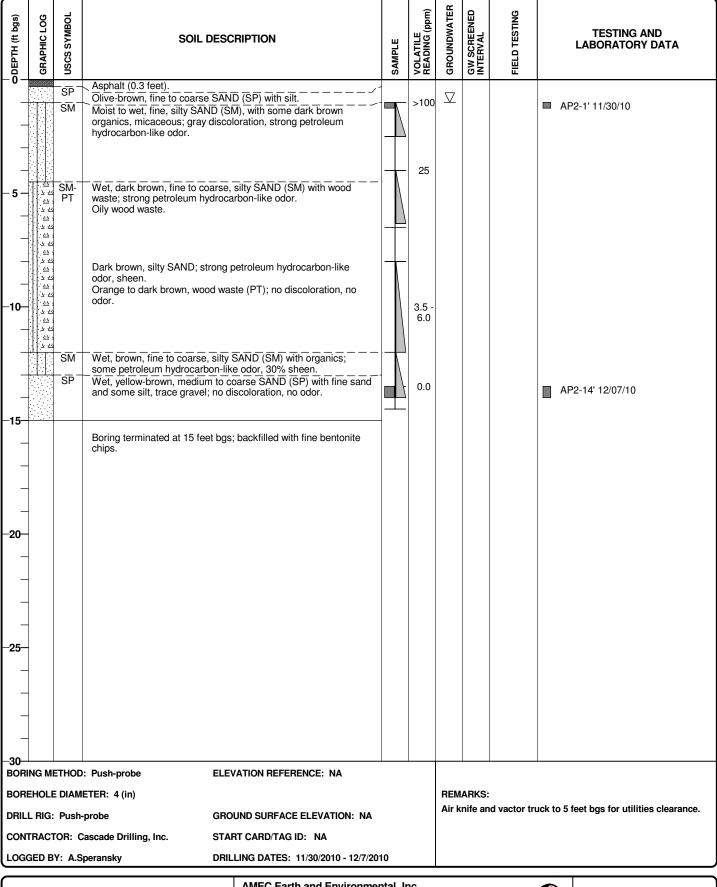
Fax (425) 368-1001

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LOG OF BORING AB-6

ODEPTH (ft bgs) GRAPHIC LOG	USCS SYMBOL	SOIL DESCRIPTION	SAMPLE	BLOW COUNT SPT N VALUE	VOLATILE READING (ppm)	GROUNDWATER	FIELD TESTING		TESTING AND LABORATORY DATA
	SM	Asphalt (5 inches). Gray, moist, silty, fine to coarse SAND (SM) with gravel, wood, glass (Fill); grayish discoloration, petroleum hydrocarbon-like odor, staining.							
-5 -	SM	Medium dense, moist to wet (at bottom), gray, fine to mediun silty SAND (SM) with gravel; grayish discoloration, strong petroleum hydrocarbon-like odor, sheen ~50%.	m,	9	12	\		AP	1-5'
-10 -10 -	SM	Dense, wet, gray, fine to coarse, silty SAND (SM) with some subrounded gravel; no discoloration, some petroleum hydrocarbon-like odor, no sheen.		25	3.1			AP	1-10'
-15- -	ML	Organics. Brown wood waste with silt (ML), laminated; no discoloration some organic odor.	;	26	5.1			AP	1-15'
S.G.P.J. AMEC PORTLAND.GDT 2/16/111 -20- 25-	THOD	Boring terminated at 17 feet bgs; sand installed to 15 feet bg installed and sampled temporary well with screened interval from 5 to 15 feet bgs. Backfilled with medium bentonite chips; cement patch at surface.	s;		REMM	ARKS			
BOREHOLE DRILL RIG:	DIAMI	GROUND SURFACE ELEVATION: CASING ELEVATION: NA ascade Drilling, Inc.			Air kı Samı	nife an oled w	d vactor tr	ger to 5 f	eet bgs for utilities clearance. eet bgs, D&M sampler to 17 feet le.
9	<i>'</i>	American Distributing American Distributing AMEC Earth and Environce 11810 North Creek Park Bothell, Washington USA 98011 Tel (425) 368-1000 Fax (425) 368-1001			Ə 1	ฑ	eď	•	LOG OF BORING AP-1 PAGE 1 OF 1





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AMEC PORTLAND.GDT 2/22/1

02LS.GPJ

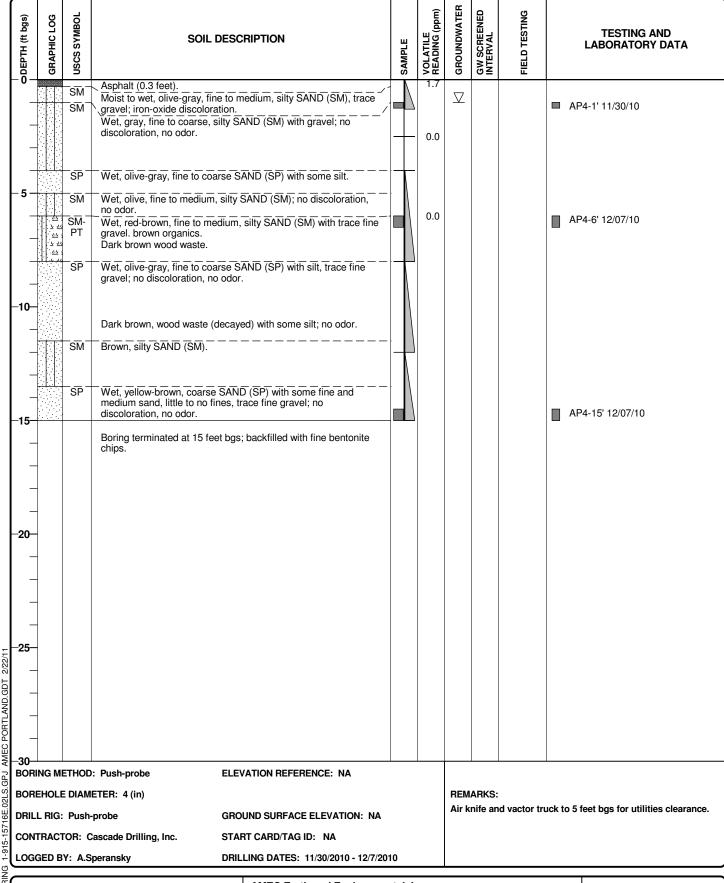
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LOG OF BORING AP-2

ODEPTH (ft bgs)	GRAPHIC LOG	USCS SYMBOL	SOIL DESC	RIPTION	SAMPLE	VOLATILE READING (ppm)	GROUNDWATER	GW SCREENED INTERVAL	FIELD TESTING		TESTING AND LABORATORY DATA
-0-		SM SM	Asphalt (0.3 feet). Moist to wet, gray, fine to coarse, (Fill); no discoloration, no odor. Wet, olive-gray, fine, silty SAND gray discoloration, petroleum hyd sheen.	/		2.2	∇				AP3-1' 11/30/10
- 5	7.77 7.77 7.77 7.77 7.77 7.77	SM- PT	Wet, brown, fine to coarse, silty Sorganics, bricks. Wood waste; product, 100% sheethydrocarbon-like odor.			80					
_ _ _10_	7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7		Trace gravel; sheen. Dark brown wood waste with som hydrocarbon-like odor.	ne silt; some petroleum		0.2				- A	AP3-9' 12/07/10
_ _ _ _15	77.7 7.7 7.7 7.7 7.7 7.7 7.7 7.7		Driller reports soft material. Grou	undwater rose up to surface.							
-20-			Boring terminated at 15 feet bgs; chips.	backfilled with fine bentonite							
AMEC PORTLAND.GDT 2/22/11											
BORII BORI CONT LOGG	HOLE RIG:	Push-	probe GROU ascade Drilling, Inc. STAR	ATION REFERENCE: NA UND SURFACE ELEVATION: NA RT CARD/TAG ID: NA LING DATES: 11/30/2010 - 12/7/20	10			ARKS: nife an		uck to	5 feet bgs for utilities clearance.
Come 1-91	pan	/	American Distributing	AMEC Earth and Environment 11810 North Creek Parkway Bothell, Washington USA 98011 Tel (425) 368-1000 Fax (425) 368-1001	ntal, Ir N	nc.	Ə I	n	eď	9	LOG OF BORING AP-3 PAGE 1 OF 1



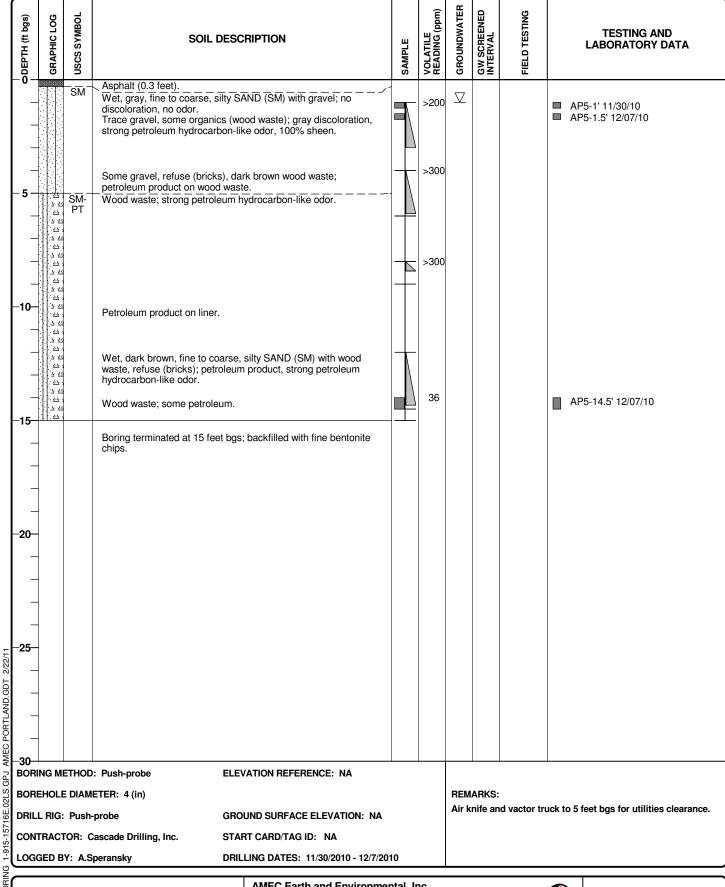
1-915-15716E

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LOG OF BORING AP-4



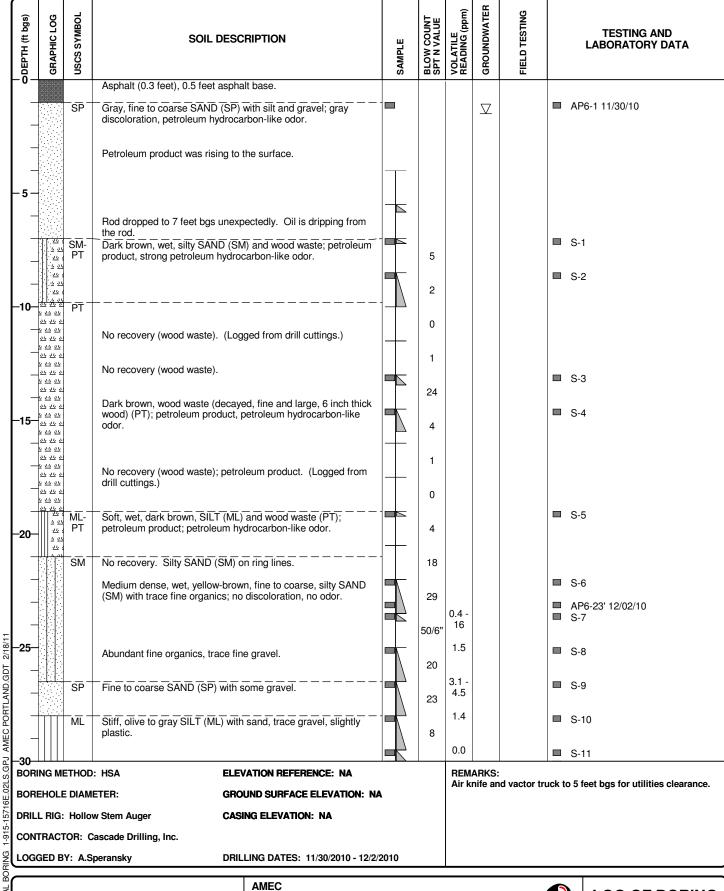
1-915-15716E

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LOG OF BORING AP-5



1-915-15716E

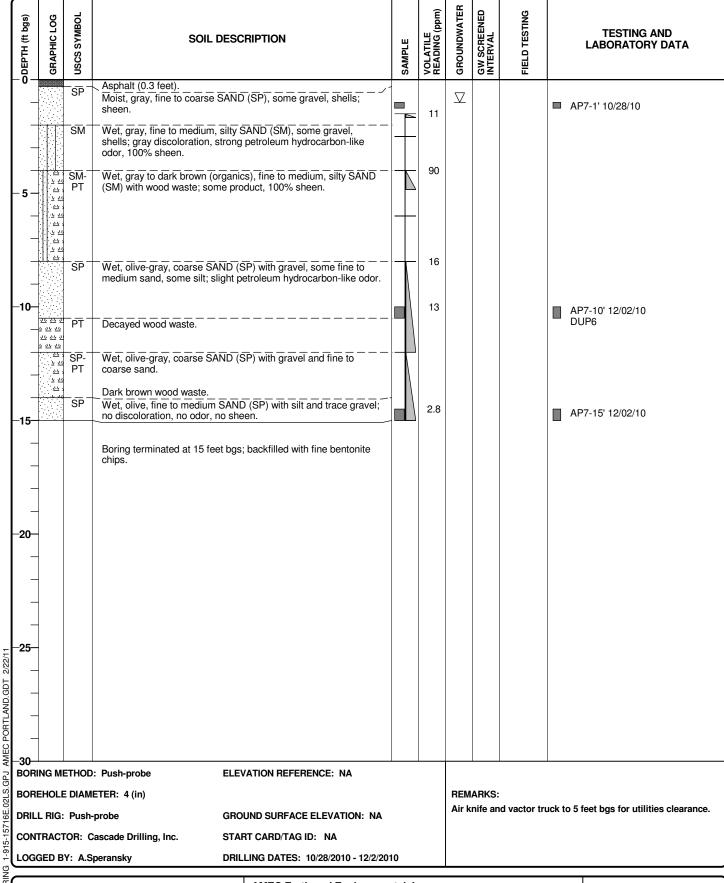
7376 SW Durham Road Portland, Oregon USA 97224 Tel (503) 639-3400 Fax (503) 620-7892



LOG OF BORING AP-6

В В DEPTH (ft bgs)	GRAPHIC LOG	USCS SYMBOL	SOIL DES	SCRIPTION	SAMPLE	BLOW COUNT SPT N VALUE	VOLATILE READING (ppm)	GROUNDWATER	FIELD TESTING		TESTING AND LABORATORY DATA
-30-		ML	Stiff to very stiff, moist, gray to sand, iron oxidation; no discolo	olive-gray SILT (ML) with fine		16					AP6-30' 12/02/10
			dana, iron oxidation, no diodoic	ration, no odor.		31	0.0				S-12
			Becomes very stiff, gray, trace odor.	organics; no discoloration, no							S-13
		SM SP	Brown, wet, fine to medium, sill Dense, wet, olive-gray, fine to	ty SAND (SM).	-	38					
-35-						31					S-14
		SM	Becomes silty SAND (SM) with								
_			Boring terminated at 35.5 feet slurry via tremmie pipe.	bgs; backfilled with bentonite							
_											
_											
-40 -											
-											
-											
-45-											
-											
-50-											
-55—											
1/2											
AMEC PORTLAND.GDT 2/18/11											
- - 											
ੂ ਜੂ -60											
21.	ORING METHOD: HSA OREHOLE DIAMETER:			EVATION REFERENCE: NA	_			ARKS: nife an		uck to	o 5 feet bgs for utilities clearance.
BORE				ROUND SURFACE ELEVATION: NA	١.						
1-21-21-21-21-21-21-21-21-21-21-21-21-21	RILL RIG: Hollow Stem Auger ONTRACTOR: Cascade Drilling, Inc.			ISING ELEVATION: NA							
	_			RILLING DATES: 11/30/2010 - 12/2/	2010						
Exx Com	ExxonMobil / American Distributing Company 1-915-15716E			AMEC 7376 SW Durham Road Portland, Oregon USA 97224 Tel (503) 639-3400 Fax (503) 620-7892			Ə I	n	ec	S	LOG OF BORING AP-6 PAGE 2 OF 2





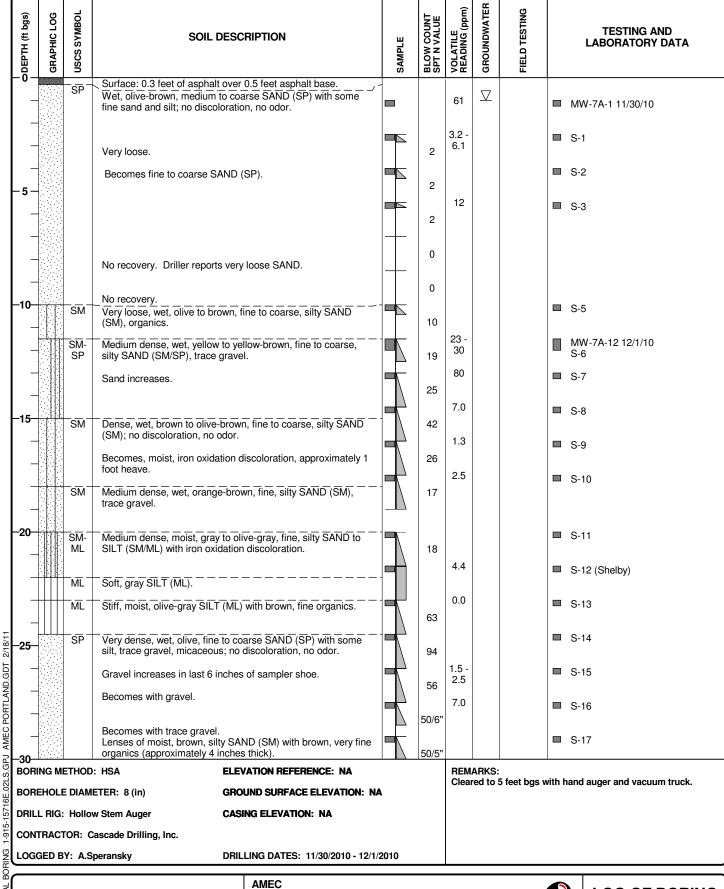
1-915-15716E

AMEC Earth and Environmental, Inc. 11810 North Creek Parkway N Bothell, Washington USA 98011 Tel (425) 368-1000

Fax (425) 368-1001

amec

LOG OF BORING AP-7

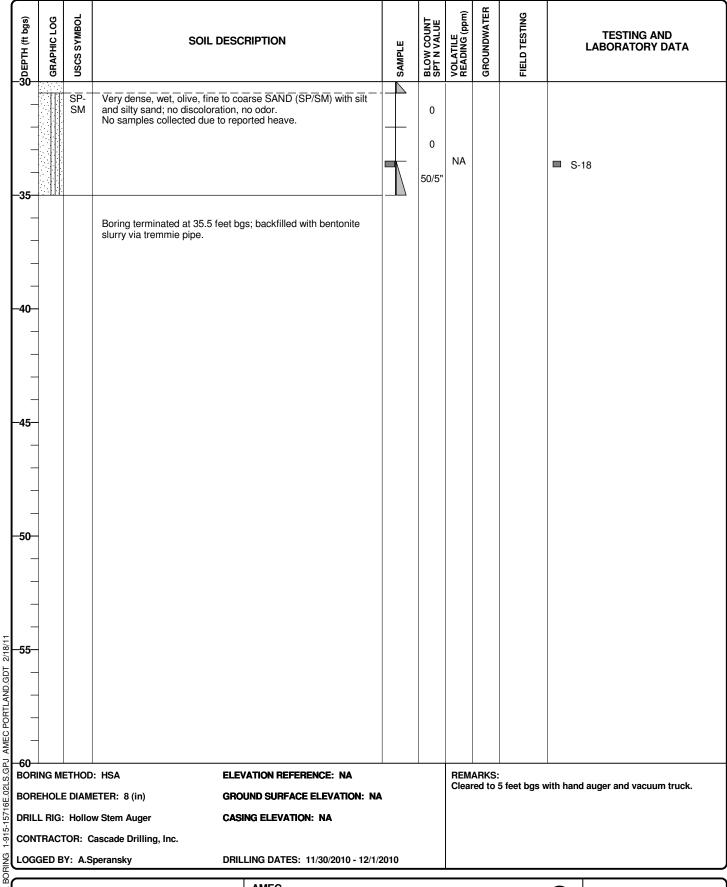


1-915-15716E

AMEC 7376 SW Durham Road Portland, Oregon USA 97224 Tel (503) 639-3400 Fax (503) 620-7892



LOG OF BORING MW-7AB



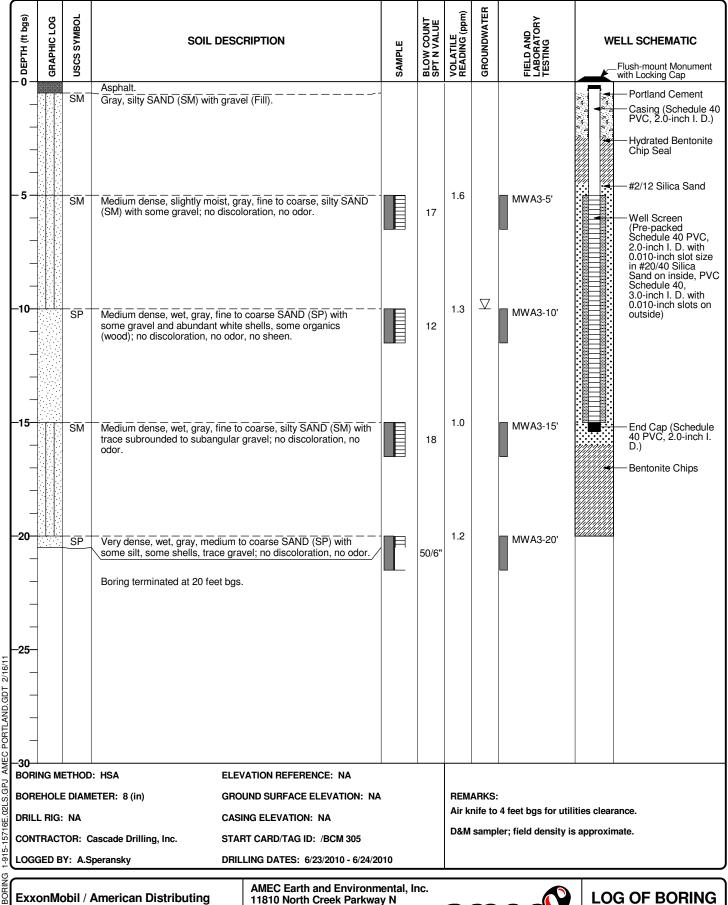
1-915-15716E

BORING

AMEC 7376 SW Durham Road Portland, Oregon USA 97224 Tel (503) 639-3400 Fax (503) 620-7892



LOG OF BORING MW-7AB



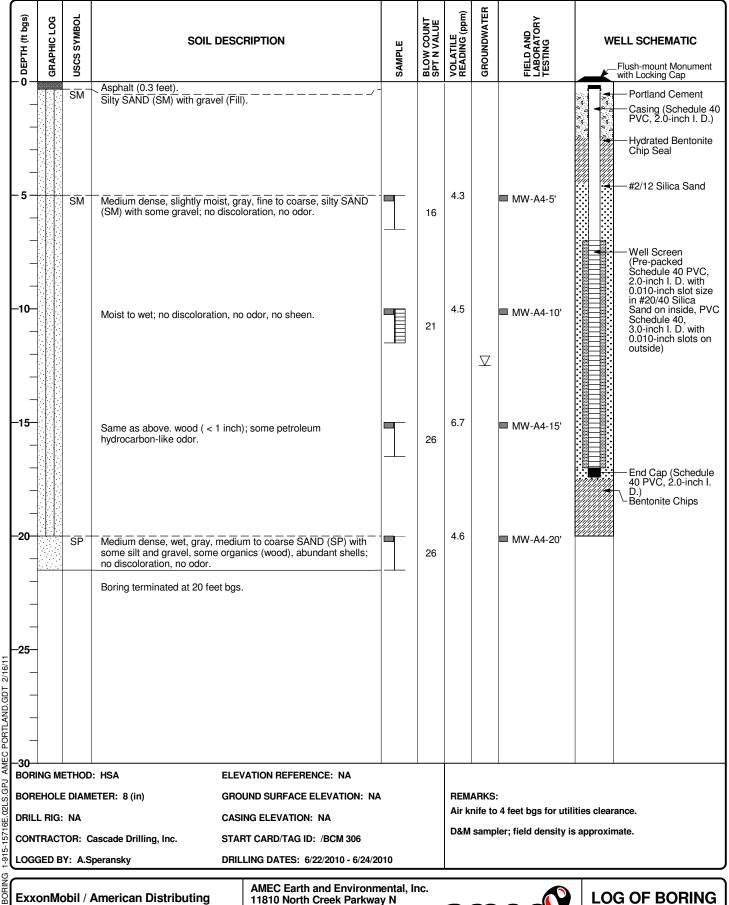
1-915-15716E

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LOG OF BORING MW-A3



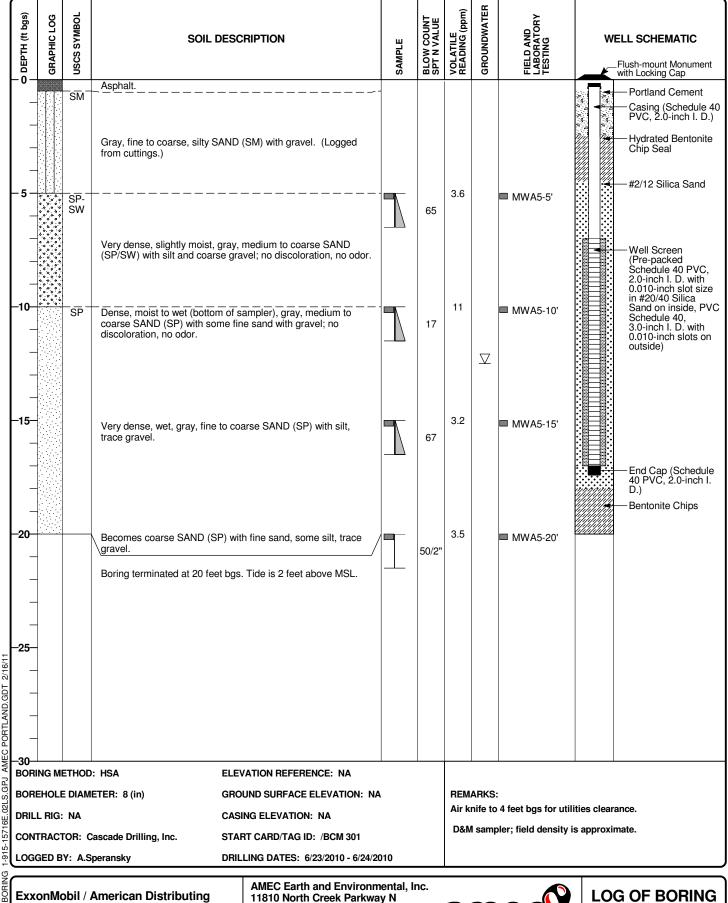
1-915-15716E

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LOG OF BORING MW-A4



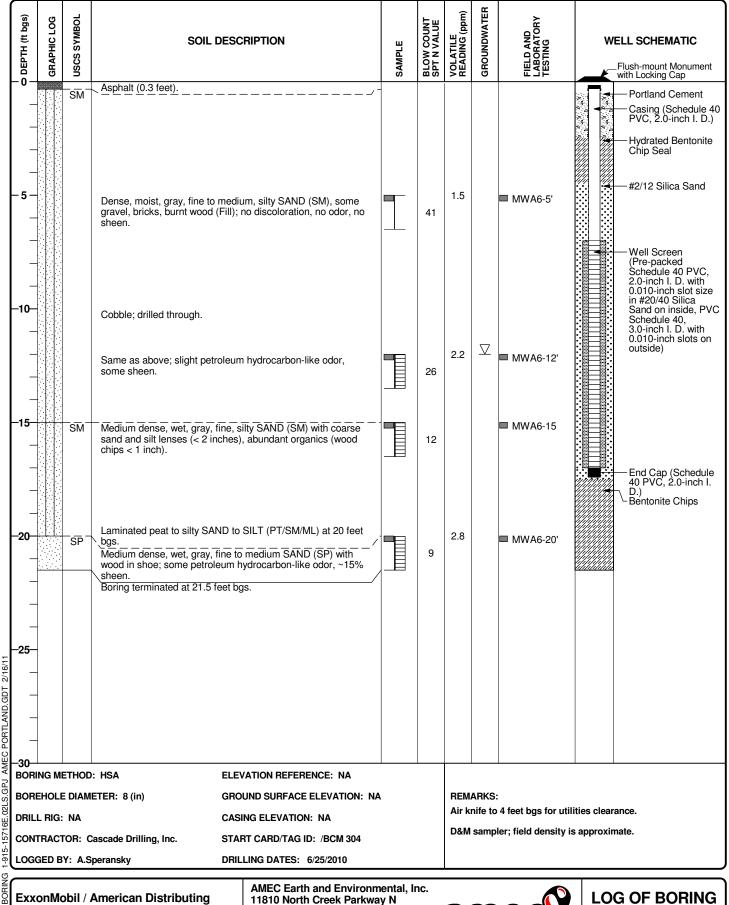
1-915-15716E

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LOG OF BORING MW-A5



1-915-15716E

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LOG OF BORING MW-A6

DEPTH (ft bgs)	GRAPHIC LOG	USCS SYMBOL	SOIL DESC	RIPTION	SAMPLE	BLOW COUNT SPT N VALUE	VOLATILE READING (ppm)	GROUNDWATER	FIELD AND LABORATORY TESTING	ELL SCHEMATIC Flush-mount Monument with Locking Cap
- 0	NG ME	THOD	ETER: 8 (in) GRC w Stem Auger CAS					ARKS:		— Portland Cement — Casing (Schedule 40 PVC, 2.0-inch I. D.) — Medium Bentonite Chips — #2/12 Silica Sand — Well Screen (Pre-packed Schedule 40 PVC, 2.0-inch I. D. with 0.010-inch slot size in #20/40 Silica Sand on inside, PVC Schedule 40, 3.0-inch I. D. with 0.010-inch slots on outside) — End Cap (Schedule 40 PVC, 2.0-inch I. D.)
LOGG				LING DATES: 12/2/2010						
EXXG Com 1-91:	pany	7	American Distributing	AMEC Earth and Environm 11810 North Creek Parkwa Bothell, Washington USA 98011 Tel (425) 368-1000 Fax (425) 368-1001	nental, Ir ny N	nc.	Ə 1	ກ	ec®	G OF BORING MW-A7 PAGE 1 OF 1



PROJE						Data Investigation Everett, WA		Log of Bo	orin	g No. B	N-SB04
BORIN	G LO	CAT	ION:	BNSF Pro	operty			ELEVATION AND DA	TUM:		
DRILLI	NG C	ONT	RAC	TOR: Caso	cade Drilli	ng, Inc.		DATE STARTED: 10/21/13		DATE FIN 10/21/13	
DRILLI	NG M	ETH	OD:	Hollow	-stem au	ger		TOTAL DEPTH (ft.): 25.0		Ground S	
DRILLI	NG E	QUIF	PMEN	IT: CME 7	5			DEPTH TO WATER (fi	i.)	FIRST NA	COMPL. NA
SAMPL	ING N	ИЕТ	HOD:	Modified	California	ı drive sampler [18" x	2.5"]	LOGGED BY: J. Bellamy, LG			
HAMM	ER W	EIGI	HT:	300 lb		DROP: 30 in		RESPONSIBLE PROF	ESSI	ONAL:	REG. NO. L.Hg. 1354
DEPTH (feet)	Sample S No.	Sample T	Blows/ S Foot	OVM READING (ppm)	NA	ME (USCS): color, mois	SCRIPTION st, % by wt., plast. den react. w/HCl, geo. inter	sity, structure,		R	EMARKS
	Š	Š	<u> </u>	<u> </u>	\A/ \ \		Elevation: NA	da a de la constanta de la con			
- 1-					(10Y	L-GRADED SAND wit R 3/4), moist, 85% fine ounded gravel (up to 0	e to coarse sand, 10%				
_									-	Cleared to with vacuu	10 feet bgs ım truck.
2-									-	BN-SB04-	
3-									_	10 FT.	rom interval 0 to
4-	2113			0.1							
_	BN-SB04-4-102113								_		
5-	BN-SB				wet:	at 5.3 FT.			_	No sheen.	
6-					Wet	3.511.			-		
_									-		
7-									_		
8-									_		
9-											
9 – _											
10 –		<u> </u>		0.2					-	No sheen.	
- 11-			10								
-		$\left\langle \cdot \right\rangle$	10 9	0.3					-	No sheen.	
12-			14							No sheen.	
13-			11 13 12	0.3	(10Y	L-GRADED SAND wit R 5/6), moist, medium , 5% fine subrounded (dense, 85% fine to co	parse sand, 10%		No sheen.	
14 -			15 16	0.3 0.4		Y SAND (SM): dark yo edium sand, 20% fines ze).				No sheen.	
15-				•							OAKBOREV (REV. 8/2011)
		а	med					Project No. 3	91157	16G.02	Page 1 of 2

PROJECT: ExxonMobil/ADC Final Data Investigation 2717/2731 Federal Ave. Everett, WA

Log of Boring No. BN-SB04 (cont'd)

ī	SAN			- S (DECODIDATION		REMARKS
DEPTH (feet)	Sample No.	Sample	Blows/ Foot	OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., plast. density, structure, cementation, react. w/HCl, geo. inter.		NEW WATER
16-		X	17 21 20	0.4	very dark grayish brown (10YR 3/2),	No she	
17-			20 21 20	0.4 0.4	WELL-GRADED SAND with SILT (SW-SM): very dark grayish brown (10YR 3/2), wet, medium dense, 85% fine to coarse sand, 10% fines, 5% fine subrounded gravel (up to 0.75" in size). Heaving Sand.	No she	een.
18 – – 19 –			17 26 27	0.3	risaving saira:	No she	
20 –			17 22 21	0.3		No she	
21 –			18 27	0.3	SILTY SAND (SM): dark yellowish brown (10YR 4/4), wet, medium	No she	een.
22- - 23-			10 12	0.3	dense, 75% fine to coarse sand, 20% fines, 5% fine subrounded gravel (up to 0.75" in size).	No she	
24-	-102113		20	0.4	SILTY SAND (SM): dark yellowish brown (10YR 4/4), wet, medium dense, 60% fine to coarse sand, 35% fines, 5% fine subrounded gravel (up to 0.75" in size), mottled. SILT (ML): very dark gray (10YR 3/1), wet, no plasticity, stiff, 85%	No she	
25-	BN-SB04-24.5-102113		14 17		fines, 10% fine sand, 5% fine subrounded gravel (up to 0.75" in size), trace shells. Bottom of Boring @ 25.0 FT. Abandoned with bentonite to surface.		
26 – – 27 –						_ _ _	
28-						- - -	
29-							
30-							
32-							
33							OAKBOREV (REV. 8/2011)
		а	me	0.	Project No. 3	39115716G.02	Page 2 of 2

PROJECT: ExxonMobil/ADC Final Data Investigation 2717/2731 Federal Ave. Everett, WA		Log of Boring No. BN-SB05	
BORING LOCATION: BNSF Property		ELEVATION AND DATU	M:
DRILLING CONTRACTOR: Cascade Drilling, Inc.		DATE STARTED: 10/21/13	DATE FINISHED: 10/21/13
DRILLING METHOD: Hollow-stem auger		TOTAL DEPTH (ft.): 24.5	MEASURING POINT: Ground Surface
DRILLING EQUIPMENT: CME 75		DEPTH TO WATER (ft.)	FIRST COMPL.
SAMPLING METHOD: Modified California drive sampler [18" x 2.5"]		LOGGED BY: J. Bellamy, LG	
HAMMER WEIGHT: 300 lb	DROP: 30 in	RESPONSIBLE PROFES John Long	SSIONAL: REG. NO. L.Hg. 1354
DEPTH (feet) Sample No. Sample Blows/ Foot OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., plast. der cementation, react. w/HCl, geo. inte	sity, structure, r.	REMARKS
1- 2- 3- 4- 10 0.0 7- 10 11 8- 10 0.0 7- 11 11 12- 11- 11- 11- 11- 11- 11- 11-	WELL-GRADED SAND with SILT (SW-SM): da (10YR 3/4), moist, 85% fine to coarse sand, 10% subrounded gravel (up to 0.75" in size), trace rot trace brick and wood debris. FILL. WELL-GRADED SAND with SILT (SW-SM): da (10YR 3/2), wet, medium dense, 90% fine to coa 5% fine subrounded gravel (up to 0.75" in size). WELL-GRADED SAND with SILT (SW-SM): ve brown (10YR 3/2), wet, medium dense, 85% fine 10% fines, 5% fine subrounded gravel (up to 0.75").	rk grayish brown arse sand, 5% fines,	Cleared to 5 feet bgs with vacuum truck. BN-SB05-102113 is collected from interval 0 to 5 FT. No sheen. No sheen. No sheen. No sheen. No sheen. No sheen. No sheen. No sheen. No sheen. No sheen. No sheen.
15 / 12			OAKBOREV (REV. 8/2011)
amec [®] Project No			15716G.02 Page 1 of 2

Log of Boring No. BN-SB05 (cont'd)

NAME (USCS): color, moist, % by wt., plast. density, structure, cementation, react. w/HCl, geo. inter. No sheen.	MARKS
12 0.2 Treaving Sand.	
40 / 0.2	
16 - 16 No sheen.	
$17 - \begin{array}{ c c c c c c c c c c c c c c c c c c c$	
SANDY SILT (ML): yellowish brown (10YR 5/4), wet, low plasticity, very stiff, 60% fines, 40% fine to medium sand.	
SILT (ML): very dark gray (10YR 3/1), wet, low plasticity, stiff, 93% fines, 5% fine sand, trace fine subrounded gravel (up to 0.75" in	
20 — 10 10 size).	
$\begin{bmatrix} 21 - & & & & \\ & 10 & & & \\ & 10 & & & \\ & 10 & & & \end{bmatrix}$	
22- 10 10	
$\begin{array}{c c} - & & \\ 23 - & & \\ \infty & & \\ \end{array}$	
24 - 1501	
Bottom of Boring @ 24.5 FT. Abandoned with bentonite to surface.	
29-	
33 OA	KBOREV (REV. 8/2011)
amec Project No. 39115716G.02 P	Page 2 of 2

PROJE					Final Data Investigation ral Ave. Everett, WA	Log	g of Bori	ing No. E	BN-SB06	
BORING	G LO	CAT	ION:	BNSF Pro	operty	ELEVATION NA	N AND DATU	M:		
DRILLIN	IG C	ONT	RAC	TOR: Caso	cade Drilling, Inc.	DATE STAF 10/21/13		DATE FINISHED: 10/21/13		
DRILLIN	IG M	ETH	IOD:	Hollow	-stem auger	TOTAL DEF	PTH (ft.):	Ground	RING POINT: Surface	
DRILLIN	IG E	QUIF	PMEN	NT: CME 7	5	DEPTH TO	WATER (ft.)	FIRST NA	COMPL. NA	
SAMPL	ING N	ИЕТ	HOD	: Modified	California drive sampler [18" x 2.5"]	LOGGED B J. Bellamy			, ,	
HAMME	RW	EIGI	HT:	300 lb	DROP: 30 in		BLE PROFES	SSIONAL:	REG. NO. L.Hg. 1354	
DEPTH (feet)	Sample No.	_	Blows/ S Foot	OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., plas cementation, react. w/HCl, ged	o. inter.) ,		REMARKS	
	S	S	ш	<u>«</u>		NA	h.m.			
- 1-					WELL-GRADED SAND with SILT (SW-SM (10YR 3/4), moist, 85% fine to medium san subrounded gravel (up to 0.75" in size).			_ - Cleared	to 5 feet bgs with	
								- vacuum		
2-									6-102113 is from interval 0 to	
3-								_ 3 F 1.		
4-	BN-SB06-4-10213			0.2	Wet @ 4 FT.			No sheer	٦.	
5-	BN-SB06	\ /		0.0						
6-		X	4	_	Oll TV OAND (OM), dad only o'd brown	40)/[2,0/4]		- - Na alaaa	_	
7-			7	0.0	SILTY SAND (SM): dark yellowish brown (dense, 75% fine to medium sand, 20% fine gravel (up to 0.75" in size), mottled.			No sheer	1.	
_		X	10 21					No sheer	1.	
8-			28 12	0.0				No sheer	٦.	
9-			14 16	0.0				No sheer	٦.	
10-		\bigvee	13	0.0	WELL-GRADED SAND with SILT (SW-SM (10YR 3/4), wet, medium dense, 90% fine t fines.			_ No sheer	٦.	
11-			15 18	0.0				_ _ No sheer	٦.	
12-		V	16 20					_		
_			20	0.0				No sheer	1.	
13-			19 21	_	SILTY SAND (SM): dark yellowish brown (10VR 3/4) wet m	nedium	No sheer	٦.	
14-			21	0.0	dense, 80% fine to medium sand, 20% fine		- Culum	No sheer	٦.	
15			14						OAKBOREV (REV. 8/2011)	
		_	me	.		Р	roject No. 3911	15716G 02	Page 1 of 2	

Log of Boring No. BN-SB06 (cont'd)

	SAN	1PLI	ES				
- -			Blows/ Foot	OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., plast. density, structure, cementation, react. w/HCl, geo. inter.		REMARKS
16-		X	24 21	0.0	WELL-GRADED SAND with SILT (SW-SM): dark yellowish brown (10YR 3/4), wet, medium dense, 85% fine to coarse sand, 10% fines, 5% fine subrounded gravel (up to 0.75" in size).	No s	heen.
-		\bigwedge	28 31 30			No s	heen.
17 –	Í	\bigvee	26	0.0	Heaving Sand.	No s	sheen.
18-	ļ	$\left\langle \cdot \right\rangle$	27 29	0.0		No s	sheen.
19-		$\left \right $	21 25			No s	heen.
20 –	ł	\bigvee	31 10	0.0	brown (10YR 5/3),	_	
21 –	ļ	\bigwedge	10 10 20	0.0		_	
22-			10 20		SILTY SAND (SM): dark yellowish brown (10YR 4/4), moist,		
23-	2113	\bigvee	20		medium dense, 80% fine to coarse sand, 20% fines. WELL-GRADED SAND with SILT (SW-SM): brown (10YR 5/3), wet, dense sand, 90% fine to coarse sand, 10% fines.		
24 - 25 - 8688	B06-24-10	Λ	31 33 36	0.0	Bottom of Boring @ 24.5 FT. Abandoned with bentonite to surface.		
25 – g	S-NB				Bottom of Borning & 24.5 FT. Abandoned with bentonite to surface.	_	
26 -						_	
27 –						_	
28-							
29-							
30-						_	
31-						_	
32-						_	
33							OAKBOREV (REV. 8/2011)
		a	me	0	Proiect No. 3	39115716G.02	

BORING LOCATION: BINSF Property	PROJI						Data Investiga Everett, WA	ation		L	og of Bor	in	g No. B	N-SB07
DRILLING CONTRACTOR Cascade Drilling, Inc. DATE SMATTED DATE SMISHED: 10/18/13 10/18/13	BORIN	IG LO	CATI	ON:	BNSF Pr	operty	•				ION AND DATU	JM:		
DRILLING METHOD: Hollow-stem auger							ling Inc			DATE ST				
DRILLING BCI IPUC Priorw-stern auger 25.0 Growd Surface 25.0 Growd Surface 25.0 Growd Surface 25.0 Growd Surface 25.0 Growd Surface 25.0 Growd Surface 25.0 Growd Surface 25.0 Growd Surface 25.0 Growd Surface 25.0 25.0 Growd Surface 25.0 25														
Deliciting Del	DRILL	ING M	ETH	OD:	Hollow	-stem au	ıger				, <u> </u>		Ground	Surface
SAMPLING METHOD. Modified California drive sampler [18" x 2.5"] LOGGED BY: J. Bellamy, L. C.	DRILL	ING E	QUIF	MEN	T: CME 7	'5				DEPTH T	O WATER (ft.)			
HAMMER WEIGHT: 300 lb DROP: 30 in RESPONSIBLE PROFESSIONAL: REG. NO. LHg. 1354	SAMP	LING I	METH	HOD:	Modified	Californi	a drive sample	r [18" x 2.5"]						
SAMPLES SAMP	HAMN	IER W	EIGH	HT:	300 lb		DROP: 30 ir	1		RESPON	ISIBLE PROFE	SSI	ONAL:	
1	EPTH feet)				OVM ADING opm)	N/	AME (USCS): co	lor, moist, % by w	vt., plast. dens	sity, struct			F	-
(10YR 34), moist, 85% fine to coarse sand, 10% fines, 5% fine subrounded gravel, trace cobbles. Cleared to 10 feet bgs with vacuum truck. BN-SB07-102113 is a composite sample from 0 to 10 FT. No Sheen. Wet @ 3 FT. Wet @ 3 FT. Wet wet, wet, medium dense, 90% fine to coarse sand, 10% fines. No Sheen. No Sheen. No Sheen. No Sheen. No Sheen. No Sheen. No Sheen.	===	San	San	B 오										
Wet @ 3 FT. Wet @ 3 FT. Wet @ 3 FT. Wet @ 3 FT. Wet @ 3 FT. Wet @ 3 FT. Wet @ 3 FT. Wet @ 3 FT. Wet @ 3 FT. Wet @ 3 FT. No Sheen. No Sheen. No Sheen. No Sheen. No Sheen. No Sheen. No Sheen. No Sheen. No Sheen. No Sheen. No Sheen.	1-	-				(10)	LL-GRADED SA YR 3/4), moist, 8	ND with SILT (S	SW-SM): dar			_	Cloared	10 foot has
8- 9- 10- 11- 11- 12- 9- 12- 9- 13- 15- 0.0 0.0 0.0 WELL-GRADED SAND with SILT (SW-SM): dark yellowish brown (10YR 3/4), wet, medium dense, 90% fine to coarse sand, 10% fines. No Sheen. No Sheen. No Sheen. No Sheen. No Sheen. No Sheen.	2-	_				We	t @ 3 FT.					_	BN-SB07- composite to 10 FT.	um truck. 102113 is a e sample from 0
10 - 0.0	5- 5- 6- 7-	BN-SB07-4-101813												
No Sheen. No Sheen. No Sheen. OAKBOREV (REV. 8/2011)	10 - 11 -			13 15	0.0	(10)	YR 3/4), wet, me						No Sheen	
OAKBOREV (REV. 8/2011)	14 - -	-		8 8	0.0							_		
	<u> </u>		-	mor	•						Project No. 301	157	16G 02	

Log of Boring No. BN-SB07 (cont'd)

т		MPL	ES	<u>o</u>				DEMA DIZO
DEPTH (feet)	Sample No.	Sample	Blows/ Foot	OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., plast. density, structure, cementation, react. w/HCl, geo. inter.		r	REMARKS
16-			6 12 13	0.0	WELL-GRADED SAND with SILT (SW-SM): dark yellowish brown (10YR 3/4), wet, medium dense, 90% fine to coarse sand, 10% fines.	_	No Sheen	
17 – – 18 –			16 15	0.0 0.0	WELL-GRADED SAND with SILT (SW-SM): dark yellowish brown (10YR 3/4), wet, medium dense, 90% fine to coarse sand, 10% fines.		No Sheen	
19-		$\bigvee_{i=1}^{N}$	8 9 9	0.0	Heaving Sand.	-	No Sheen	
20 –			14 19 25	0.1		- -	No Sheen	
21 – – 22 –			20 22 25	0.0	very dark gray (10YR 3/1),	_	No Sheen	
23-			22 27 26			_	No Sheen	
24 – –	BN-SB07-24-101813	X	23 18	0.2 0.1		_	No Sheen	
25 – – 26 –	BN-SB07-		19		Bottom of Boring @ 25 FT. Abandoned with bentonite to surface.			
27-						_		
28 –						_		
29 – - 30 –						- -		
31-						_		
32-						_		
33 –	I		-	<u> </u>				OAKBOREV (REV. 8/2011)
		а	me	co Co	Project No.	. 391157	716G.02	Page 2 of 2

2/1//2		Final Data Investigation	Log of B	oring No. C	CE-SB01
BORING LOCATION:		·	ELEVATION AND DA	TUM:	
DRILLING CONTRAC	TOR: Casca	de Drillina. Inc.	DATE STARTED:	DATE FI	
DRILLING METHOD:		tem auger	10/23/13 TOTAL DEPTH (ft.):		RING POINT:
			20.0	FIRST	Surface COMPL.
DRILLING EQUIPMEN	11: CME 75		DEPTH TO WATER (f	nt.) NA	NA
SAMPLING METHOD:	Modified C	alifornia drive sampler [18" x 2.5"]	J. Bellamy, LG		
IAMMER WEIGHT:	300 lb	DROP: 30 in	RESPONSIBLE PRO John Long	FESSIONAL:	REG. NO. L.Hg. 1354
(feet) Sample No. Sample Blows/ Foot	OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., pla cementation, react. w/HCl, ge	est. density, structure,		REMARKS
Sar Sar Sar Sar Sar Sar Sar Sar Sar Sar	RE C	Surface Elevation:	NA		
1-		SILTY SAND (SM): very dark gray (10YR medium sand, 30% fines, 5% fine subrour FILL.		_	
2-				vacuum tCE-SB01collected	o 5 feet bgs with ruck. -4-102313 is from interval 0 to
3	11.6			5 FT. - -	
CE-SB01-4-102313	26	Wet @ 5 FT.		- No sheer	ì.
6- - 7- 5	142 134	Pieces of wood, brick fragments, glass, ce pieces (up to 1"). FILL.	eramic tile fragments, rock	Sheen	
8 - 15 20	96.8			petroleunhydrocarl	oon-like odor.
9- 2 4 3 2				petroleun hydrocarl	isible product, n pon-like odor. isible product,
10 - 6-1023	64.6 76.1	PEAT (PT): reddish brown (2.5YR 2.5/3), SANDY SILT (ML). FILL.	wet, soft, mixed with	petroleun hydrocarl	
11 - 89 4 4	35			Sheen, vi	oon-like odor. isible product,
12- 4 4 4	64.9			Sheen, p	oon-like odor.
13-	71.5	SILTY SAND (SM): very dark gray (10YR fine to medium sand, 30% fines, 5% fine s 0.75").		Sheen, p	
14	44.9	PEAT (PT): reddish brown (2.5YR 2.5/3),	wet, soft, mixed with		isible product,
15		SANDY SILT (ML).		petroleunhydrocarl	oon-like odor.

Log of Boring No. CE-SB01 (cont'd)

(feet)	Sample 14	Blows/ SA Foot	OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., plast. density, structure, cementation, react. w/HCl, geo. inter.	REMARKS
- 16- - 17- - 18- - 19-		2 2 1 2 1 3 2 4	29	PEAT (PT): reddish brown (2.5YR 2.5/3), wet, soft, mixed with SANDY SILT (ML).	Sheen, visible product, petroleum hydrocarbon-like odor. Sheen, visible product, petroleum hydrocarbon-like odor.
20 - - 21 - - 22 - - 23 -		12 20 20	7.5 3.4 5.9 2.6	PEAT (PT): reddish brown (2.5YR 2.5/3), wet, soft, 100% organic matter. SANDY SILT (ML): very dark gray (10YR 3/1), wet, no plasticity, soft, 60% fines, 40% fine to medium sand. ORGANIC SOIL (PT): reddish brown (2.5YR 2.5/3), wet, stiff, 100% organic matter. Piece of rock from 22 FT to 22.5 FT. SILTY SAND (SM): very dark gray (10YR 3/1), moist, medium dense, 65% fine to medium sand, 30% fines, 5% fine subrounded gravel (up to 0.75"), wood debris.	Sheen. No sheen. Sheen. Sheen.
24 - 24 - 24 - 25 - 25 - 26 - 27 - 28 - 29 - 29 - 29 - 29 - 29 - 29 - 29		20 21 22	1.2	Bottom of Boring @ 24.5 FT. Abandoned with bentonite to surface.	_ No sheen.
30 - - 31 - - 32 - - 33		amed	Ø	Project No. 3	OAKBOREV (REV. 8/2011) 39115716G.02 Page 2 of 2

PROJECT: ExxonMobil/AD 2717/2731 Fed	C Final Data Investigation eral Ave. Everett, WA	Log of Boi	ring No. CE-SB02
BORING LOCATION: City of E	·	ELEVATION AND DATU	JM:
DRILLING CONTRACTOR: Cas	scade Drilling, Inc.	DATE STARTED: 10/23/13	DATE FINISHED: 10/23/13
DRILLING METHOD: Hollo	w-stem auger	TOTAL DEPTH (ft.): 20.0	MEASURING POINT: Ground Surface
DRILLING EQUIPMENT: CME	75	DEPTH TO WATER (ft.)	FIRST COMPL. NA NA
SAMPLING METHOD: Modified	d California drive sampler [18" x 2.5"]	LOGGED BY: J. Bellamy, LG	1.00
HAMMER WEIGHT: 300 lb	DROP: 30 in	RESPONSIBLE PROFE John Long	SSIONAL: REG. NO. L.Hg. 1354
DEPTH (feet) Sample No. Sample Blows/ Foot OVM READING (ppm)		o. inter.	REMARKS
1- 1- 2- 3- 3- 4- 4- 1096 5- 8- 3 4 4 4 4 5 232 76.9 2 2 8- 108 3 2 2 76.9 2 2 79.4 87.5 4 4 5 20.9 12- 2 2 34 23 7 87 44 7	SILTY SAND (SP-SM): dark brown (10YR medium sand, 30% fines, 5% fine subround wood debris, ceramic tile debris. FILL. Wet @ 5 FT. PEAT (PT): reddish brown (2.5YR 2.5/3), v SILTY SAND (SM), nails, glass fragments, size). FILL.	vet, soft, mixed with	Cleared to 5 feet bgs with vacuum truck. Sheen, visible product, petroleum hydrocarbon-like odor. Sheen, petroleum hydrocarbon-like odor. Sheen, petroleum hydrocarbon-like odor. Sheen, petroleum hydrocarbon-like odor. Sheen, petroleum hydrocarbon-like odor. Sheen, petroleum hydrocarbon-like odor. Sheen, petroleum hydrocarbon-like odor. Sheen, petroleum hydrocarbon-like odor. Sheen, petroleum hydrocarbon-like odor. Sheen, petroleum hydrocarbon-like odor. Sheen, petroleum hydrocarbon-like odor.
5 5			Sheen, petroleum hydrocarbon-like odor.
15 6		, , , , , , , , , , , , , , , , , , ,	OAKBOREV (REV. 8/2011)
amec [©]		Project No. 391	15716G.02 Page 1 of 2

Log of Boring No. CE-SB02 (cont'd)

_	AMPL	ES	U			_	
(feet)	No. Sample	Blows/ Foot	OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., plast. density, structure, cementation, react. w/HCl, geo. inter.	,	R	EMARKS
- 16 - - 17 -		3 3 4	6.5 4.6	PEAT (PT): reddish brown (2.5YR 2.5/3), wet, soft, 100% organ matter, nails, glass fragments, hydrogen sulfide-like odor. FILL.	nic	Sheen, pe hydrocarb Sheen. No sheen.	on-like odor.
18- 19- 1		7	3.2 0.8	SILTY SAND (SM): very dark gray (10YR 3/1), wet, loose, 70% to medium sand, 25% fines, 5% fine subrounded gravel. PEAT (PT): reddish brown (2.5YR 2.5/3), wet, soft, 100% organ matter, nails, hydrogen sulfide-like odor.		No sheen.	
19		10		SILTY SAND (SM): very dark gray (10YR 3/1), wet, loose, 70% to medium sand, 25% fines, 5% fine subrounded gravel. Bottom of Boring @ 20 FT. Abandoned with bentonite to surface		No sheen.	
22- - 23-					- - -		
24-					- - -		
25 – – 26 – –					- - -		
27 – – 28 –					- - -		
29 – – 30 –					- - -		
31 32 -					- - -		
33							OAKBOREV (REV. 8/2011)
	а	med	CO	Project	ct No. 391157	16G.02	Page 2 of 2

BORING LOCATION: ExxonMobil/ADC	ring No. E	A-SB01	
DATE STARTED: 10/28/13	UM:		
DRILLING METHOD: Modified California drive sampler [18" x 2.5"] SAMPLING METHOD: Modified California drive sampler [18" x 2.5"] DEPCH TO WATER (ft.) LOGGED BY: J. Bellamy, LG RESPONSIBLE PROFI John Long DESCRIPTION NAME (USCS): color, moist, % by wit., plast, density, structure, cementation, react, wHCl, geo, inter. Surface Elevation: NA Asphalt (0.5 inches), road base (13 inches), CAP fabric at 18 inches. SILTY SAND (SM): very dark gray (10YR 3/1), moist, 55% fine to medium sand, 40% fines, 5% fine subrounded gravel (up to 0.75"), wood debris, nails, glass fragments. FILL. PEAT (PT): reddish brown (2.5YR 2.5/3), wet, very soft, mixed with SILTY SAND (SM): very dark gray (10YR 3/1), moist, very loose, 55% fine to medium sand, 40% fines, 5% fine subrounded gravel (up to 0.75"), wood debris, nails, glass fragments. FILL. PEAT (PT): reddish prown (2.5YR 2.5/3), wet, very soft, mixed with SILTY SAND (SM): very dark gray (10YR 3/1), wet, medium dense, 55% fine to medium sand, 40% fines, 5% fine subrounded gravel (up to 0.75"), wood debris, nails, glass fragments. FILL. Vood pieces. SILTY SAND (SM): very dark gray (10YR 3/1), wet, medium dense, 55% fine to medium sand, 40% fines, 5% fine subrounded gravel (up to 0.75"), wood debris, nails, glass fragments. FILL. Wood pieces. SILTY SAND (SM): very dark gray (10YR 3/1), wet, medium dense, 85% fine to coarse sand, 10% fines, 5% fine to medium sand, 40% fines, 5% fine to coarse sand, 10% fines, 5% fine ubrounded gravel (up to 0.75"), wood debris, nails, glass fragments. FILL.	DATE FINISHED: 10/28/13		
Common	MEASURIN Ground S	urface	
SAMPLES HAMMER WEIGHT: 300 lb DROP: 30 in DESCRIPTION SAMPLES DESCRIPTION NAME (USCS): color, moist, % by wt., plast. density, structure, cementation, react. w/HCl. geo. inter. Surface Elevation: NA Asphalt (0.5 inches), road base (13 inches), CAP fabric at 18 inches. SILTY SAND (SM): very dark gray (10YR 3/1), moist, 55% fine to medium sand, 40% fines, 5% fine subrounded gravel (up to 0.75"), wood debris, cobbles, ceramic pieces. FILL. PEAT (PT): reddish brown (2.5YR 2.5/3), wet, very soft, mixed with SILTY SAND (SM): very dark gray (10YR 3/1), moist, very loose, 55% fine to medium sand, 40% fines, 5% fine subrounded gravel (up to 0.75"), wood debris, nails, glass fragments. FILL. Wood pieces. SILTY SAND (SM): very dark gray (10YR 3/1), wet, medium dense, 55% fine to medium sand, 40% fines, 5% fine subrounded gravel (up to 0.75"), wood debris, nails, glass fragments. FILL. Wood pieces. SILTY SAND (SM): very dark gray (10YR 3/1), wet, loose, 55% fine to medium sand, 40% fines, 5% fine subrounded gravel (up to 0.75"), wood debris, nails, glass fragments. FILL. Wood pieces. SILTY SAND (SM): very dark gray (10YR 3/1), wet, loose, 55% fine to medium sand, 40% fines, 5% fine subrounded gravel (up to 0.75"), wood debris, nails, glass fragments. FILL. Wood pieces. SILTY SAND (SM): very dark gray (10YR 3/1), wet, loose, 55% fine to medium sand, 40% fines, 5% fine subrounded gravel (up to 0.75"), wood debris, nails, glass fragments. FILL.) FIRST NA	COMPL. NA	
HAMMER WEIGHT: 300 lb			
SAMPLES SAMP	ESSIONAL:	REG. NO. L.Hg. 1354	
Asphalt (0.5 inches), road base (13 inches), CAP fabric at 18 inches. SILTY SAND (SM): very dark gray (10YR 3/1), moist, 55% fine to medium sand, 40% fines, 5% fine subrounded gravel (up to 0.75"), wood debris, cobbles, ceramic pieces. FILL. Wet @ 5.5 FT. PEAT (PT): reddish brown (2.5YR 2.5/3), wet, very soft, mixed with SILTY SAND (SM); very dark gray (10YR 3/1), moist, very loose, 55% fine to medium sand, 40% fines, 5% fine subrounded gravel (up to 0.75"), wood debris, nails, glass fragments. FILL. SILTY SAND (SM): very dark gray (10YR 3/1), wet, mixed with SILTY SAND (SM); very dark gray (10YR 3/1), wet, mixed with SILTY SAND (SM); very dark gray (10YR 3/1), wet, mixed with SILTY SAND (SM); very dark gray (10YR 3/1), wet, medium dense, 55% fine to medium sand, 40% fines, 5% fine subrounded gravel (up to 0.75"), wood debris, nails, glass fragments. FILL. Wood pieces. SILTY SAND (SM): very dark gray (10YR 3/1), wet, medium dense, 55% fine to medium sand, 40% fines, 5% fine subrounded gravel (up to 0.75"), wood debris, nails, glass fragments. FILL. Wood pieces. SILTY SAND (SM): very dark gray (10YR 3/1), wet, loose, 55% fine to medium sand, 40% fines, 5% fine subrounded gravel (up to 0.75"), wood debris, nails, glass fragments. FILL.	RE	EMARKS	
SILTY SAND (SM): very dark gray (10YR 3/1), wet, medium dense, 55% fine to medium sand, 40% fines, 5% fine subrounded gravel (up to 0.75"), wood debris, nails, glass fragments. FILL. Wood pieces. SILTY SAND (SM): very dark gray (10YR 3/1), wet, loose, 55% fine to medium sand, 40% fines, 5% fine subrounded gravel (up to 0.75"), wood debris, nails, glass fragments. FILL. WELL-GRADED SAND with SILT (SW-SM): very dark gray (10YR 3/1), wet, medium dense, 85% fine to coarse sand, 10% fines, 5% fine subrounded gravel (up to 0.75"), wood debris.	Sheen, visi petroleum hydrocarbo Sheen, visi petroleum hydrocarbo Sheen, visi petroleum hydrocarbo Sheen, petroleum hydrocarbo Sheen, petroleum hydrocarbo	ble product, on-like odor. ble product, on-like odor. ble product, on-like odor. roleum on-like odor.	
3/1), wet, medium dense, 85% fine to coarse sand, 10% fines, 5% fine subrounded gravel (up to 0.75"), wood debris.	hydrocarbo Sheen, peti hydrocarbo Sheen, visi petroleum	n-like odor.	
	No sheen,	n-like odor.	
15 Project No. 39		Page 1 of 2	

Log of Boring No. EA-SB01 (cont'd)

	SAI	MPL	ES	Ŋ			
DEPTH (feet)	Sample No.	_	Blows/ Foot	OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., plast. density, structure, cementation, react. w/HCl, geo. inter.		REMARKS
			7			Sheen, po	etroleum
-			5	60 20.3	WELL-GRADED SAND with SILT (SW-SM): very dark gray (10YR		oon-like odor.
16-			8	20.5	3/1), wet, loose, 90% fine to coarse sand, 10% fines, wood debris.	Sheen, p	etroleum
		$ \rangle \rangle$	5 6		WELL-GRADED SAND with SILT (SW-SM): very dark gray (10YR	hydrocart	oon-like odor.
17 – –				26.3	3/1), wet, loose, 90% fine to coarse sand, 10% fines, wood debris, mixed with PEAT, reddish brown (2.5YR 2.5/3), hydrogen	Sheen, p	etroleum oon-like odor.
18-	-	X	8		sulfide-like odor.	_	
_	-		9	43.5		No sheer	l.
19-	113	$ \bigvee $	_	10		Sheen.	
_	1-1028	Å	5 5	10		- Sileen.	
20 –	EA-SB01-102813		6		Bottom of Boring @ 20 FT. Abandoned with bentonite to 1 FT bgs	No sheer	
_	E				and cement to surface.		
21-	-						
22-							
						_	
23-						_	
_						_	
24 –						_	
-							
25 –							
-	-						
26 –							
27 –							
						_	
28-						_	
_	-					_	
29-						_	
-							
30 –							
-							
31 –							
32-							
-							
33-							
		9		Δ.	Ιμ	204457422 22	OAKBOREV (REV. 8/2011)
		а	me	C°	Project No. 3	39115716G.02	Page 2 of 2

PROJE	ECT:	Exx 271	onN 7/27	/lobil/AD0 731 Fede	C Final Data Investigation eral Ave. Everett, WA	Log of Bo	rin	g No. E	A-SB02
BORIN	IG LO	CATI	ON:	ExxonMo	obil/ADC	ELEVATION AND DAT	UM:		
DRILLI	NG C	ONTF	RAC ⁻	TOR: Cas	cade Drilling, Inc.	DATE STARTED: 10/28/13	DATE FINISHED: 10/28/13 MEASURING POINT:		
DRILLI	NG M	IETHO	OD:	Hollov	v-stem auger	TOTAL DEPTH (ft.): 20.0		Ground S	
DRILLI	NG E	QUIP	MEN	NT: CME		DEPTH TO WATER (ft.))	FIRST NA	COMPL. NA
SAMPI	ING	METH	HOD:	Modified	California drive sampler [18" x 2.5"]	LOGGED BY: J. Bellamy, LG		1	1.0.1
НАММ	ER W	'EIGH	łT:	300 lb	DROP: 30 in	RESPONSIBLE PROFI	ESSI	ONAL:	REG. NO. L.Hg. 1354
DEPTH (feet)	Sample SS No.	Sample 14M	Blows/	OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., plast. d cementation, react. w/HCl, geo. in Surface Elevation: NA	ter.		R	EMARKS
					Asphalt (5 inches), road base (10 inches), CAI	P fabric at 15 inches.			
1- 2-					SILTY SAND (SM): very dark gray (10YR 3/1) mediums and, 30% fines, 5% fine subrounded cobbles. FILL			Cleared to vacuum tru	5 feet bgs with ick.
3- 4- 5- 6- 7- 8- 9-	EA-SB02-4-101413		4 3 2 3 2 3 9 4	421 33.3 18.3 30.4	Wet @ 5.5 ft with wire and wood debris.		-	petroleum hydrocarbo Sheen, vis petroleum hydrocarbo Sheen, vis petroleum hydrocarbo Sheen, vis petroleum hydrocarbo	ible product, on-like odor. ible product, on-like odor. ible product, on-like odor. ible product,
10-			5 6 6	61.6 8.6	Mixed with PEAT, reddish brown (2.5YR 2.5/3) SILTY SAND (SM): very dark gray (10YR 3/1) to mediums and, 30% fines, 5% fine subround 0.75"), glass pieces. FILL.	, wet, loose, 65% fine		petroleum hydrocarbo	ible product, on-like odor. ible product,
11-			5	42.8	Mixed with PEAT, reddish brown (2.5YR 2.5/3))		•	on-like odor.
12-			3 3 4	16.1			-	Sheen, pet	roleum on-like odor.
13 <i>-</i>			2 3		PEAT (PT): reddish brown (2.5YR 2.5/3), wet wood pieces and SILTY SAND (SM).	soft, mixed with			
14 -			6 4	9.8	WELL-GRADED SAND with SILT (SW-SM): v 3/1), wet, loose, 90% fine to medium sand, 10			No sheen.	
15-	<u> </u>	<u>/ \</u>	т .						PAKBOREV (REV. 8/2011)
		aı	med	.0		Project No. 39	1157	16G.02	Page 1 of 2

Log of Boring No. EA-SB02 (cont'd)

DEPTH (feet)		Sample	Blows/ 5	OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., plast. density, structure, cementation, react. w/HCl, geo. inter.	R	EMARKS
16-		X	5 4	21.6 19.6	PEAT (PT): reddish brown (2.5YR 2.5/3), wet, medium stiff, mixed with POORLY-GRADED SAND with SILT (SP-SM), hydrogen sulfide-like odor.		
17-		\bigvee	5 5 5 6	8.6		Sheen. Sheen.	
18-			5	12		Sheen.	
19-			6 5 4	3.2		No sheen.	
20 21 -	21-102813	V	4 4	7.1	PEAT (PT): reddish brown (2.5YR 2.5/3), wet, medium stiff, 100% organic, trace fine subrounded gravel (up to 0.75"), wood pieces, hydrogen sulfide-like odor.	No sheen.	
22-	EA-SB02-21-102813		4		Bottom of Boring @ 21.5 FT. Abandoned with bentonite to 1 FT bg and cement to surface.	gs	
23-						-	
24 – – 25 –						_	
26-						_	
27 – –						-	
28-						_	
29 30 -						_ _ _	
31 –						- - -	
32-						_	
33⊥							DAKBOREV (REV. 8/2011)
		a	med	co.	Project	No. 39115716G.02	Page 2 of 2

PROJECT				Final Data Investigation ral Ave. Everett, WA	Log of Bor	ing No. E	A-SB03
BORING L	_OCA	TION:	ExxonMo	bil/ADC	ELEVATION AND DATU	JM:	
DRILLING	CON	ITRAC	TOR: Case	cade Drilling, Inc.	DATE STARTED: 10/30/13	DATE FIN 10/30/13	
DRILLING	MET	HOD:	Hollow	-stem auger	TOTAL DEPTH (ft.): 20.0	MEASURING POINT: Ground Surface	
DRILLING	EQU	JIPMEN	NT: CME 7	5	DEPTH TO WATER (ft.)	FIRST NA	COMPL.
SAMPLING	G ME	THOD	: Modified	California drive sampler [18" x 2.5"]	LOGGED BY: J. Bellamy, LG		
HAMMER	WEI	GHT:	300 lb	DROP: 30 in	RESPONSIBLE PROFE	SSIONAL:	REG. NO. L.Hg. 1354
_	No.		OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., plast. do	ensity, structure, ter.	R	EMARKS
S	ů.	<u> </u>	₩.	Surface Elevation: NA Asphalt (7 inches), road base (8 inches).			
1- 2- 3-				WELL-GRADED SAND with SILT (SW-SM): v 3/1), moist, 70% fine to coarse sand, 20% fine (up to 0.75"), 10% fines, cobbles, wood debris.	subrounded gravel	- vacuum tru	5 feet bgs with uck. 5-103013 is rom interval 0 to
C + + - + + + + + + + + + + + + + + + +			155 29.6	Wet @ 5 FT.		- - Petroelum	
6- 7-		7 3 3 3	3.2 10.5	Wood pieces WELL-GRADED SAND with SILT (SW-SM): v 3/1), moist, 70% fine to coarse sand, 20% fine (up to 0.75"), 10% fines, cobbles, wood debris. SILTY SAND (SM): very dark gray (10YR 3/1) to medium sand, 20% fines, 5% fine subroundedebris, rootlets.	subrounded gravel FILL. , wet, loose, 75% fine	hydrocarbo	on-like odor.
8 - - 9 -		1 2	0.7	SILTY SAND (SM): dark gray (10YR 4/1), wet medium sand, 15% fines, 5% fine subrounded rootlets.		Sheen. No sheen.	
10-		2 2 2	10.7 5.7	DEAT (DT): and disk is a (2.5) (2.5)	5 400V - ·	Sheen.	
11 – 11 – 103013		3	1.7	PEAT (PT): reddish brown (2.5YR 2.5/3), wet, matter, hydrogen sulfide-like odor.	soπ, 100% organic	Sheen.	
13 13 14 15 15 15 15 15 15 15		3 4 4	0.7 0.5			No sheen. No sheen.	
14-		5 16 5	0.2	WELL-GRADED SAND with SILT (SW-SM): owet, loose, 90% fine to medium sand, 10% fine		No sheen.	
15—	V						OAKBOREV (REV. 8/2011)
		ame	c _o		Project No. 391	15716G.02	Page 1 of 2

Log of Boring No. EA-SB03 (cont'd)

						Г
(feet) Sample No.	Sample	Blows/ S Foot	OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., plast. density, structure, cementation, react. w/HCl, geo. inter.		REMARKS
16 – 17 –		6 7 3 4 6	0.8 0.5	WELL-GRADED SAND with SILT (SW-SM): dark gray (10YR 4/1), wet, loose, 90% fine to medium sand, 10% fines, hydrogen sulfide-like odor.		No sheen.
18-		8 7 5	0.6	PEAT (PT): reddish brown (2.5YR 2.5/3), wet, soft, 100% organic matter, with pieces of wood, hydrogen sulfide-like odor.	_	No sheen.
- 05 		3 4 4	0.3	POORLY-GRADED SAND with SILT (SP-SM): dark gray (10YR 4/1), wet, loose, 90% fine to medium sand, 10% fines, hydrogen sulfide-like odor, mixed with PEAT. Bottom of Boring @ 20 Ft. Abandoned with bentonite to 1 FT bgs	_ _ _	No sheen.
21-				and cement to surface.	- - -	
22-					 - -	
24 – – 25 –					 - -	
26 — —					- - -	
27 – – 28 –					- - -	
29-					- - -	
30					 - -	
32-					- -	
			•			OAKBOREV (REV. 8/2011)
	а	me	co.	Project No.	. 391157	16G.02 Page 2 of 2

PROJE	CT:	Ex:	konN 17/2	Mobil/AD0 731 Fede	Final Data Investigation ral Ave. Everett, WA		Log of Bo	rin	g No. E	A-SB04
BORING	S LO	CAT	ION:	ExxonMo	bil/ADC		ELEVATION AND DAT	UM:		
DRILLIN	IG C	ONT	RAC	TOR: Cas	cade Drilling, Inc.		DATE STARTED: 10/23/13		DATE FINI 10/23/13	
DRILLIN	IG M	ETH	IOD:	Hollow	-stem auger		TOTAL DEPTH (ft.): 20.0		MEASURII Ground S	NG POINT: urface
DRILLIN	IG E	QUII	PMEN	NT: CME 7	75		DEPTH TO WATER (ft.))	FIRST NA	COMPL. NA
SAMPLI	NG N	ИЕТ	HOD	: Modified	California drive sampler [18" x 2.5"]		LOGGED BY:		1.0.1	107
HAMME	R W	EIG	HT:	300 lb	DROP: 30 in		J. Bellamy, LG RESPONSIBLE PROFI John Long	ESSI	ONAL:	REG. NO. L.Hg. 1354
DEPTH (feet)	Sample No.	Sample 14	Blows/ S Foot	OVM READING (ppm)	DESCRIPTIO NAME (USCS): color, moist, % by wt. cementation, react. w/HC	., plast. den Cl, geo. inte	sity, structure, r.		RI	EMARKS
					Asphalt (7 inches), road base (6 inche		bric at 15.6 inches.			
1- 2- 3-					WELL-GRADED SAND with SILT and dark gray (10YR 3/1), moist, 70% fine subrounded gravel (up to 0.75"), 10%	to coarse	sand, 20% fine	 - - - -	Cleared to vacuum tru	5 feet bgs with ck.
5- 6- 7-	EA-SB04-5-101713		4 5 3	541 327 333	Wet @ 5 FT.				petroleum hydrocarbo Sheen, pet	ble product, n-like odor. roleum n-like odor.
8-			10 10 12	99.9	Wood pieces.	A CDAVEL	(CW CM); year	_	-	n-like odor.
9-			7 15 15		WELL-GRADED SAND with SILT and dark gray (10YR 3/1), moist, 70% fine subrounded gravel (up to 0.75"), 10%	to coarse	sand, 20% fine	_	-	n-like odor.
				6.1	PEAT (PT): reddish brown (2.5YR 2.5	5/3), wet. s	tiff, 100% organic		Sheen, pet hydrocarbo	n-like odor.
10-			8 10 10		matter, pieces of wood.	- ,, 54, 6	,	_	Sheen, pet	roleum n-like odor.
11-			4	14.8 7.5				_	Sheen, pet	
12-			6	14.7	SILTY SAND (SM): very dark gray (1 to medium sand, 20% fines, 5% fine s 0.75") mixed with PEAT, reddish brow	subrounded	gravel (up to		No sheen.	
13-			2 23		5.75 / HILAGE WILLT LAT, TEGGISTI DIOW	(2.011\ 2			Sheen, pet hydrocarbo	roleum n-like odor.
14-			6	4.6				_	Sheen, pet hydrocarbo	roleum n-like odor.
15		ν \	I						0	AKBOREV (REV. 8/2011)
		a	me	co.			Project No. 39	1157 ⁻	16G.02	Page 1 of 2

Log of Boring No. EA-SB04 (cont'd)

t)		MPL o		N €	DESCRIPTION		F	REMARKS
DEPTH (feet)	Sample No.	Sample	Blows/ Foot	OVM READING (ppm)	NAME (USCS): color, moist, % by wt., plast. density, structure, cementation, react. w/HCl, geo. inter.			
_		X	7 10	2.2		_	No sheen hydrocarb	petroleum on-like odor.
16 – –			12 11	1.2	SILTY SAND (SM): very dark gray (10YR 3/1), wet, medium dense, 75% fine to medium sand, 20% fines, 5% fine subrounded gravel		No sheen	
17 –			18 13	2.8	(up to 0.75").	_	No sheen	
18-			16 22		Poor recovery, pieces of rock wedged in sampler shoe.	_	No sheen	
19-	02313		16		POORLY-GRADED SAND with SILT (SP-SM): very dark gray (10YR 3/1), wet, medium dense, 80% fine to coarse sand, 10% fine sand, 10% fine subrounded gravel (up to 0.75"), wood debris.	_	No sheen	
20 –	EA-SB04-20102313		20 20	1.6	Bottom of Boring @ 20 FT. Abandoned with bentonite to 1 FT bgs			
_ 21 _	EA-				and cement to surface.			
22-						_		
- 23-						_		
24-								
_						_		
25 – –						_		
26 – –								
27 – –						_		
28 – –						-		
29-								
30 -								
31 –								
32-								
33-								OAKBOREV (REV. 8/2011)
		2	med	۵	Project No.	391157		Page 2 of 2

PROJE	CT:	Exx 271	onN 7/27	/lobil/ADC 731 Fede	Final Data Investigation ral Ave. Everett, WA		Log of Bo	rin	g No. E	A-SB05
BORING				ExxonMo	· ·		ELEVATION AND DATE	JM:		
DRILLIN	NG C	ITNC	RAC [*]	TOR: Case	cade Drilling, Inc.		DATE STARTED: 10/29/13		DATE FIN 10/29/13	
DRILLIN	NG M	ETH	OD:	Hollow	-stem auger		TOTAL DEPTH (ft.): 20.0		MEASURII Ground S	NG POINT: turface
DRILLIN	NG E	QUIP	MEN	NT: CME 7	5		DEPTH TO WATER (ft.)		FIRST NA	COMPL. NA
SAMPL	ING N	ИЕТН	HOD:	Modified	California drive sampler [18" x 2.5"]		LOGGED BY: J. Bellamy, LG		1.0.	14/1
HAMME	R W	EIGH	HT:	300 lb	DROP: 30 in		RESPONSIBLE PROFE John Long	SSI	ONAL:	REG. NO. L.Hg. 1354
DEPTH (feet)	Sample No.	Sample	Blows/ SS Foot	OVM READING (ppm)	DESCRIP NAME (USCS): color, moist, % by cementation, react. v Surface Elevat	y wt., plast. den v/HCl, geo. inter	sity, structure,		RI	EMARKS
					Asphalt (7 inches), No CAP fabric			_		
1- - 2-					SILTY SAND with GRAVEL (SM): moist, 60% fine to medium sand, 2 gravel (up to 0.75"), wood debris, FILL.	25% fines, 15%	fine subrounded	_	Cleared to vacuum tru	5 feet bgs with ck.
3- - 4- -	EA-SB05-5-101913			122 4.0				_ _ _		
5-	EA-SB(V	3	4.0	Wet @ 5 FT.			_	No sheen.	
6-			3 4 1	3.6 0.9					No sheen.	
7-			1					-	Sheen.	
8-		X	2 2	1.4				-	No sheen.	
9-			1	0.8					No sheen.	
10 -			1 1 2		PEAT (PT): reddish brown (2.5YF	R 2,5/3). wet. s	oft. 100% organic	+	No sheen.	
11-			8 9 8	0.7	matter, hydrogen sulfide-like odor. Poor recover, due to wood pieces	•		+	No sheen.	
12-		\bigvee	U	0.8	DEAT (DT): raddiah brown (2.5VF	0.2.5/2\ wat a	off organic metter	_	No sheen.	
13-			20 21		PEAT (PT): reddish brown (2.5YF mixed with wood pieces and SILT sulfide-like odor.				No sheen.	
14-			20	4.9				_	No sheen.	
15			4							AKBOREV (REV. 8/2011)
		aı	med	۵			Project No. 39	1157		Page 1 of 2

Log of Boring No. EA-SB05 (cont'd)

S	SAMPL	ES	(D			
(feet)			OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., plast. density, structure, cementation, react. w/HCl, geo. inter.		REMARKS
_	X	5	1.63	PEAT (PT): reddish brown (2.5YR 2.5/3), wet, soft, organic matter mixed with wood pieces, hydrogen sulfide-like odor.		No sheen.
16-		8 10	20.3	WELL-GRADED SAND with SILT (SW-SM): dark brown (10YR 3/2), wet, medium dense, 90% fine to coarse sand, 10% fines mixed with 10% PEAT, hydrogen sulfide-like odor.		No sheen.
17 –		14	3.0 17		_	No sheen.
18-		8 5	17	PEAT (PT): reddish brown (2.5YR 2.5/3), wet, soft, organic matter mixed with wood pieces, hydrogen sulfide-like odor.		No sheen.
- 10 61 EA-SB05-20-102913		6 6 8	27.3	WELL-GRADED SAND with SILT (SW-SM): dark brown (10YR 3/2), wet, medium dense, 90% fine to coarse sand, 10% fines mixed with 10% PEAT and pieces of wood, hydrogen sulfide-like		No sheen.
20 - 4				odor. PEAT (PT): reddish brown (2.5YR 2.5/3), wet, soft, organic matter mixed with wood pieces, hydrogen sulfide-like odor.		
21-				Bottom of Boring @ 20 FT. Abandoned with bentonite to 1 FT bgs and cement to surface.		
22-					_	
23-					_	
24 –					_	
25 –					_	
26-					_	
27 –					_	
28-					_	
29-						
30-						
31 –						
32-						
33						OAKBOREV (REV. 8/2011)
	-	me	.	Project No	30115	

PROJECT:	Exx 271	onN 7/27	obil/AD0 31 Fede	C Final Data Investigation ral Ave. Everett, WA	Log of Bor	ing No. EA-SB06
ORING LO	CATI	ION:	ExxonMo	hil/ADC	ELEVATION AND DATU	M:
RILLING (CONT	RACT	ГОR: Cas		DATE STARTED: 10/28/13 TOTAL DEPTH (ft.):	DATE FINISHED: 10/28/13 MEASURING POINT:
RILLING N	METH	OD:	Hollow	r-stem auger	20.0	Ground Surface
RILLING E	EQUIF	PMEN	IT: CME 7	5	DEPTH TO WATER (ft.)	FIRST COMPL.
AMPLING	METI	HOD:	Modified	California drive sampler [18" x 2.5"]	LOGGED BY: J. Bellamy, LG	
AMMER V			300 lb	DROP: 30 in	RESPONSIBLE PROFES John Long	SSIONAL: REG. NO. L.Hg. 1354
(feet)	Sample Sample	Blows/ S Foot	OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., plast. dens cementation, react. w/HCl, geo. inter. Surface Elevation: NA	ity, structure,	REMARKS
				Asphalt (6 inches).		
1- - 2- - 3-				SILTY SAND (SM): gray (10YR 5/1), moist, 75% sand, 20% fines, 5% fine subrounded gravel (up t		Cleared to 5 feet bgs with vacuum truck. EA-SB06-5-101413 is collected from interval 0 to 5 FT.
EA-SB06-5-101413			417			
- L - 9 9 9 EA-SB06-6-102813		3 3 4	868 671 7.6	Wet @ 6 FT.		hydrocarbon-like odor. No sheen, petroleum hydrocarbon-like odor. No sheen, petroleum
8- -		1 1 1 2	4.2	SILTY SAND (SM): gray (10YR 5/1), wet, loose, medium sand, 20% fines, 5% fine subrounded gramixed with PEAT, reddish brown (2.5YR 2.5/3) ar	avel (up to 0.75"),	No sheen, petroleum hydrocarbon-like odor. No sheen, petroleum hydrocarbon-like odor.
9-		1	78.2	SILTY SAND (SM): very dark gray (10YR 3/1), w 75% fine to medium sand, 20% fines, 5% fine sub (up to 0.75").		No sheen, petroleum hydrocarbon-like odor. Sheen, petroleum
		1 2 8	8	SILTY SAND (SM): very dark gray (10YR 3/1), w 75% fine to medium sand, 20% fines, 5% fine sub (up to 0.75"), mixed with PEAT, reddish brown (2. wood pieces.	prounded gravel	hydrocarbon-like odor. No sheen.
- LST ST ST ST ST ST ST ST ST - ST		8	9.3	ORGANIC SOIL (PT): reddish brown (2.5YR 2.5/stiff, organic matter, pieces of wood, hydrogen su ORGANIC SOIL (PT): reddish brown (2.5YR 2.5/	lfide-like odor.	No sheen.
13 - KH - 14 -		20 21 20	2.6	stiff, organic matter, pieces of wood, metal debris brown, SANDY SILT (ML), hydrogen sulfide-like o	s, mixed with	No sheen. No sheen.
15		4				
15—	_,v	med	•		Project No. 3911	OAKBOREV (REV. 8/2011) 15716G.02 Page 1 of 2

Log of Boring No. EA-SB06 (cont'd)

	SAI	MPL	ES	(D			
DEPTH (feet)	Sample No.	_	Blows/ (Foot	OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., plast. density, structure, cementation, react. w/HCl, geo. inter.		REMARKS
16-		X	4 5	1.5 1.3			No sheen.
17-		X	8 10 14	1.2	SILTY SAND (SM): brown (10YR 5/3), wet, medium dense, 75% fine to medium sand, 20% fines, 5% fine subrounded gravel (up to		No sheen.
17		\bigvee	8	1.2	0.75") WELL-GRADED SAND with SILT (SW-SM): dark gray (10YR 4/1) wet, loose, 85% fine to coarse sand, 10% fines, 5% fine	_/	No sheen.
19-	13	$\left\langle \cdot \right\rangle$	8 5	1.3	subrounded gravel, wood pieces.		No sheen.
20 –	EA-SB06-20-102813	X	6 6 8	1.2	2 inch piece of gravel.	_	No sheen.
_ _ 21_	EA-SB				Bottom of Boring @ 20 FT. Abandoned with bentonite to 1 FT bgs and cement to surface.	-	-
22-						_	-
23-						-	-
24-						-	-
- 25-						-	-
26-						-	-
27-						_	-
28-						_	-
29-							-
30 -						_	-
31-						_	-
32-						_	-
33-							OAKBOREV (REV. 8/2011)
		а	me	co Co	Project	No. 39115	

PROJECT				Final Data Investigation ral Ave. Everett, WA	Log of Bor	ring No. F	A-SB01
BORING L				ve (West Right-of-Way)	ELEVATION AND DATU	JM:	
DRILLING	G CO	NTRA	CTOR: Caso	cade Drilling, Inc.	DATE STARTED: 10/25/13	DATE FIN 10/25/13	ISHED:
DRILLING	ME	THOD	: Hollow	-stem auger	TOTAL DEPTH (ft.): 20.0	Ground S	
DRILLING	EQI	UIPMI	ENT: CME 7	5	DEPTH TO WATER (ft.)	FIRST NA	COMPL. NA
SAMPLIN	IG MI	ETHO	D: Modified	California drive sampler [18" x 2.5"]	LOGGED BY: J. Bellamy, LG	<u> </u>	
HAMMER	WE	IGHT:	300 lb	DROP: 30 in	RESPONSIBLE PROFE	SSIONAL:	REG. NO. L.Hg. 1354
_		Sample Sample Blows/	Poot OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., plast. den cementation, react. w/HCl, geo. inte	sity, structure,	R	EMARKS
S	3 - 2	χ <u> </u>	<u> </u>	Surface Elevation: NA			
1 - 2 - 3 - 4 - 21610	2			SILTY SAND (SM): dark yellowish brown (10YF fine to medium sand, 30% fines, 10% fine subrol 0.75"), wood debris, bricks, and cobbles present	unded gravel (up to	Cleared to vacuum tru	5 feet bgs with uck.
2 - 6 - 7 - 7 - 7 - 7 - 7 - 7 - 7 - 7 - 7		5	60 34.7	Wet @ 5.5 FT.		petroleum hydrocarbo Sheen, pet hydrocarbo	ible product, on-like odor. troleum on-like odor. ible product,
8- - 9-		5 3 3 1	19.2	WELL-GRADED SAND with SILT (SW-SM): ver 3/1), wet, loose, 85% fine to coarse sand, 10% fi subrounded gravel (up to 0.75").		Sheen, vis	on-like odor. ible product, on-like odor. troleum
_	-	5	10.7	Pieces of wood.		hydrocarbo	on-like odor.
10-	\	8 8 8		WELL-GRADED SAND with SILT (SW-SM): ver 3/1), wet, loose, 85% fine to coarse sand, 10% fi subrounded gravel (up to 0.75").		Sheen, pet	roleum on-like odor.
11-		5	20.7	SILTY SAND (SM): very dark gray (10YR 3/1), to coarse sand, 20% fines, 5% fine subrounded		Sheen, pet	troleum on-like odor.
12- - 13-	<u> </u>	5				Sheen, pet	roleum on-like odor.
_		5 5 7		WELL-GRADED SAND with SILT (SW-SM): ver 3/1), wet, loose, 85% fine to coarse sand, 10% fi subrounded gravel (up to 0.75").		No sheen, hydrocarbo	petroleum on-like odor.
14-		9	7.5	PEAT (PT): reddish brown (2.5YR 2.5/3), wet, n with SILTY SAND with GRAVEL and wood debri		Sheen, pet	troleum on-like odor.
15—		V				(DAKBOREV (REV. 8/2011)
		ame	eco		Project No. 391	15716G.02	Page 1 of 2

Log of Boring No. FA-SB01 (cont'd)

(feet) Sample No.	Sample TA	Blows/ C	OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., plast. density, structure, cementation, react. w/HCl, geo. inter.	F	REMARKS
- 16 - - 17 -		8 10 3 4 4	2.2 7.6	WELL-GRADED SAND with SILT (SW-SM): very dark gray (10YR 3/1), wet, loose, 85% fine to coarse sand, 10% fines, 5% fine subrounded gravel (up to 0.75"). mixed with PEAT, reddish brown (2.5YR 2.5/3), hydrogen sulfide-like odor.	Sheen, pe hydrocarb Sheen. Sheen.	etroleum on-like odor.
18		17 23 10 13 13	2.2	WELL-GRADED SAND with SILT (SW-SM): very dark gray (10YR 3/1), wet, medium dense, 85% fine to coarse sand, 10% fines, 5% fine subrounded gravel (up to 0.75") mixed with dark brown, SILT (ML). Bottom of Boring @ 20 FT. Abandoned with bentonite to surface.	No sheen No sheen No sheen	
21 - 22 - 23 -					- - - -	
24 - - 25 - -					- - - -	
26 – 27 – 28 –					- - - -	
29 30 -					- - - -	
31 32					- - - -	
33						OAKBOREV (REV. 8/2011)
	2	med	.	Project No.	. 39115716G.02	Page 2 of 2

PROJE					Final Data Investigation ral Ave. Everett, WA	Log of Bo	orin	g No. F	A-SB02
BORIN					ve (West Right-of-Way)	ELEVATION AND DA	TUM:		
DRILLI	NG C	ОМТ	TRAC	TOR: Caso	ade Drilling, Inc.	DATE STARTED: 10/24/13		DATE FIN 10/24/13	
DRILLI	NG M	ETH	HOD:	Hollow	stem auger	TOTAL DEPTH (ft.): 20.0		Ground S	
DRILLI	NG E	QUII	PMEN	NT: CME 7	5	DEPTH TO WATER (ff	t.)	FIRST NA	NA
SAMPL	ING N	MET	HOD	: Modified	California drive sampler [18" x 2.5"]	J. Bellamy, LG		IONIAI	DEC NO
HAMME				300 lb	DROP: 30 in	RESPONSIBLE PROP John Long	FESS	IONAL:	REG. NO. L.Hg. 1354
DEPTH (feet)	Sample No.	Sample		OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., plast. o cementation, react. w/HCl, geo. i	density, structure, nter.		R	EMARKS
۵ -	Sal	Sa	Bk	RE (Surface Elevation: NA	1			
1-					WELL-GRADED SAND (SW): very dark gray 100% fine to medium sand.	y (10YR 3/1), moist,	_	Cleared to	8 feet bgs with
2-							_	vacuum tri	
3-							_ _ _		
4-	3						_		
5- - 6- -	FA-SB02-5-101513			150	Wet @ 6 FT.		- - -		ce free product, hydrocarbon troluem on odor.
7- -							_	Sheen, pe	
8- - 9-		V	10	44.8 5.6	WELL-GRADED SAND with SILT (SW-SM): 3/1), wet, loose, 90% fine to medium sand, 10		_	Sheen, pe	
10-			6 3	38.9 1.6			_	Sheen, pe	on odor.
11		\mathbb{A}	5 5 5	20.5				Sheen, pe hydrocarb	
11 – – 12 –			6	20.0	WELL-GRADED SAND with SILT (SW-SM): 3/1), wet, loose, 80% fine to medium sand, 10 subrounded gravel, wood debris (roots).			No sheen.	
13-		<u> </u>	9	7.4 5.6			_	Sheen.	
14 –			4 4 3	3.2			_	Sheen.	
-			3	J.Z			_	No sheen.	
15		γ	N						OAKBOREV (REV. 8/2011)
		ā	me	co .		Project No. 3	91157	16G.02	Page 1 of 2

Log of Boring No. FA-SB02 (cont'd)

	MPL	EC				
(feet) Sample			OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., plast. density, structure, cementation, react. w/HCl, geo. inter.		REMARKS
16-	X	5 5	2.2 3.2	SANDY SILT (ML): very dark brown (10YR 2/2), wet, no plasticity, medium stiff, 65% fines, 35% fine to medium sand, wood debris, hydrogen sulfide-like odor. SILTY SAND (SM): very dark gray (10YR 3/1), wet, loose to	_	No sheen.
17-		5 9	1.2	medium dense, 65% fine to coarse sand, 30% fines, 5% fine subrounded gravel (up to 0.75" in size), hydrogen sulfide odor.		
18-		13 14		SILTY SAND (SM): very dark gray (10YR 3/1), wet, loose to medium dense, 80% fine to coarse sand, 15% fines, 5% fine subrounded gravel (up to 0.75" in size), wood debris, hydrogen sulfide odor.		No sheen.
19 - 4		14	0.8		_	No sheem.
1-20-102	X	7 8	0.6	→ Mixed with reddish brown (2.5 YR 3.5/3) PEAT.		No sheen.
- 02 28 28 28		11		Bottom of Boring @ 20 FT. Abandoned with bentonite to surface.		
21-						
22-					_	
23-						
24 –					_	
25-						
_						
26 –					_	
27 –					_	
28-						
29-						
30 –						
31-						
_						
32-						
33						OAKBOREV (REV. 8/2011)
	а	me	co Co	Project No. 391	1571	6G.02 Page 2 of 2

PROJE	ECT:				C Final Data Investigation eral Ave. Everett, WA	Log of B	oring	g No. F	A-SB03	
BORIN	IG LO	CAT	ION:	Federal /	Ave (West Right-of-Way)	ELEVATION AND DA	ATUM:			
DRILL	NG C	ONT	RAC	TOR: Cas	cade Drilling, Inc.	DATE STARTED: 10/24/13		DATE FIN 10/24/13	ISHED:	
DRILL	NG M	IETH	IOD:	Hollov	<i>y</i> -stem auger	TOTAL DEPTH (ft.): 20.0		MEASURING POINT: Ground Surface		
DRILL	NG E	QUI	PME	NT: CME	75	DEPTH TO WATER (ft.)	FIRST NA	COMPL. NA	
SAMP	ING	MET	HOD	: Modified	California drive sampler [18" x 2.5"]	LOGGED BY: J. Bellamy, LG				
HAMM				300 lb	DROP: 30 in	RESPONSIBLE PRO John Long	PESSI	JNAL:	REG. NO. L.Hg. 1354	
DEPTH (feet)	Sample No.	Sample TO	Blows/ Sa Foot	OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., plast. cementation, react. w/HCl, geo. Surface Elevation: N/ POORLY-GRADED SAND with SILT (SP-SN	inter.		R	EMARKS	
1- 2- 3- 3- 4- 5- 6- 7- 8- 9- 10- 11- 12-	FA-SB03-6.5-102413 FA-SB03-4-102413		4 4 4 4 5 7 9 6 7 8 8 9 9 5 7 7	9.4 9.5 23.4 7.4 2.6 0.5 0.5 0.8	brown (10YR 3/2), moist, 85% fine to medium fine subrounded gravel (up to 0.75"), wood of the subrounded gravel (up to 0.75"), wood of the subrounded gravel (up to 0.75"), wood of the subrounded gravel (up to 0.75"), wood of the subrounded gravel (up to 0.75"), wood of the subrounded gravel (up to 0.75"). SILTY SAND (SM): very dark gray (10YR 3/2), wet, loose, 85% fine to coarse sand, 10 subrounded gravel (up to 0.75").	wet, loose, 60% fine to ded gravel (up to 0.75") gray (10GY 4/1). (1), wet, 65% fine to gravel (up to 0.75"). E very dark gray (10YR 0% fines, 5% fine		Vacuum tru FA-SB03-4 collected fr 5 FT. No sheen. Sheen, pet hydrocarbo Sheen, pet	a-102413 is from interval 0 to from interval 0 to from interval 0.	
13 - - 14 - -			7 8 8	2.1	mixed with PEAT, reddish brown (2.5YR 2.5.	/3).	- - - -	No sheen.		
15-		<u> </u>	13					C	DAKBOREV (REV. 8/2011)	
		ā	me	c _©		Project No.	3911571	6G.02	Page 1 of 2	

Log of Boring No. FA-SB03 (cont'd)

SA	MPL	ES	(5)			
(feet)		Blows/ Foot	OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., plast. density, structure, cementation, react. w/HCl, geo. inter.		REMARKS
_	X	15				No sheen.
16-		19 15	0.4 0.2	WELL-GRADED SAND with SILT (SW-SM): very dark gray (10YF 3/1), wet, medium dense, 75% fine to coarse sand, 10% fines, 5% fine subrounded gravel, rootlets.	₹ _	No sheen.
17 –		17 22 10	0.2		_	No sheen.
18-		11 14	0.2 0.2		_	No sheen.
- 05 61 61 61 61		16 17 22	0.2	mixed with PEAT, reddish brown (2.5YR 2.5/3).	_	No sheen.
21 –				Bottom of Boring @ 20 FT. Abandoned with bentonite to surface.	_	
22-					_	
23-					_	
24 –					_	
25 -					_	
26 – – 27 –					_	
28-					_	
29-					_	
30 -					_	
31-					_	
32-					_	
			•			OAKBOREV (REV. 8/2011)
	а	med	-o	Project	No. 391157	716G.02 Page 2 of 2

PROJECT				C Final Data Investigation eral Ave. Everett, WA		Log of Bo	ring No. F	A-SB04
BORING L	_OCA	TION:	Federal A	Ave (West Right-of-Way)		ELEVATION AND DATU	JM:	
DRILLING	CON	TRAC	TOR: Cas	cade Drilling, Inc.		DATE STARTED: 10/24/13	DATE FII 10/24/13	3
DRILLING	MET	HOD:	Hollow	v-stem auger		TOTAL DEPTH (ft.): 20.0	MEASUF Ground	RING POINT: Surface
DRILLING	EQU	IPME	NT: CME 7	75		DEPTH TO WATER (ft.)	FIRST NA	COMPL. NA
SAMPLING	G ME	THOD	: Modified	California drive sampler [18" x 2.5"]		LOGGED BY: J. Bellamy, LG		1.0.1
HAMMER	WEIG	SHT:	300 lb	DROP: 30 in		RESPONSIBLE PROFE	ESSIONAL:	REG. NO. L.Hg. 1354
-	No. Sample		OVM READING (ppm)	DESCRIF NAME (USCS): color, moist, % b cementation, react. v Surface Eleva POORLY-GRADED SAND with S	oy wt., plast. den: w/HCl, geo. inter ution: NA			REMARKS
1- 2- 3- 4- 102413			2.3	brown (10YR 3/2), moist, 85% finfine subrounded gravel (up to 0.7	e to medium sa		vacuum t	o 5 feet bgs with ruck. -4-102413 is from interval 0 to
4 - 7 - 5 - 7 - 7 - 7 - 7 - 7 - 7 - 7 - 7		2 2 3	0.1 0.8 0.1	Wet @ 5 FT. SANDY SILT (ML): dark greenish plasticity, 70% fines, 30% fine sal SILTY SAND (SM): dark greenish fine to medium sand, 30% fines, \$	nd. h gray (5GY 4/1), wet, loose, 65%		
8- - 9-		1 2 1 5 11	0.1	0.75"). Mixed with PEAT, reddish brown	(2.5yr 2.5/3), bu	urnt wood debris.	No sheen	
10 -		10	0.2	WELL-GRADED SAND with SILT	(SW-SM)· ver	v dark grav (10YR	No sheen	ı.
11-		9 11 12	0.1	3/1), wet, loose, 85% fine to coars subrounded gravel (up to 0.75").			No sheen	
13-		10 10 7	0.1 0.2	hadroner salfate III			No sheen	
_		5		hydrogen sulfide-like odor.			No sheen	
15—	-	əme	ø			Project No. 391	115716G 02	OAKBOREV (REV. 8/2011) Page 1 of 2
	•	on ne	<u> </u>			i Toject No. 39	1107 100.02	1 age 1 01 Z

Log of Boring No. FA-SB04 (cont'd)

	A B 4 D !	<u> </u>	I		Т	
(feet)	No. Sample	Blows/ SS	OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., plast. density, structure cementation, react. w/HCl, geo. inter.	Э,	REMARKS
16-	X	5 5	2.8 21.6	WELL-GRADED SAND with SILT (SW-SM): very dark gray (1 3/1), wet, loose, 85% fine to coarse sand, 10% fines, 5% fine subrounded gravel (up to 0.75"), mixed with PEAT, reddish bro (2.5yr 2.5/3).	/	No sheen.
17 —		5 6 7	9.9	WELL-GRADED SAND with SILT (SW-SM): very dark gray (1 3/1), wet, loose, 85% fine to coarse sand, 10% fines, 5% fine subrounded gravel (up to 0.75"), hydrogen sulfide-like odor.	0YR	No sheen. No sheen.
18-		6 8 10		WELL-GRADED SAND with SILT (SW-SM): very dark gray (1 3/1), wet, loose, 85% fine to coarse sand, 10% fines, 5% fine subrounded gravel (up to 0.75"), mixed with PEAT, reddish bro		No sheen.
102413		6 5	0.3	(2.5yr 2.5/3). WELL-GRADED SAND with SILT (SW-SM): very dark gray (1 3/1), wet, loose, 85% fine to coarse sand, 10% fines, 5% fine subrounded gravel (up to 0.75"), hydrogen sulfide-like odor.	0YR	No sheen.
19		8	0.0	Bottom of Boring @ 20 FT. Abandoned with bentonite to surface	ce.	
21 –					-	-
22-					-	-
23-					-	-
24 – – 25 –					- - -	- - -
26 –					-	-
_ 27 <i>-</i>					-	-
28-					-	-
29-					-	- - -
30 -					-	-
31-					-	-
32-					-	-
33		I				OAKBOREV (REV. 8/2011)
	a	me	co	Pro	ject No. 39115	716G.02 Page 2 of 2

PROJE					Final Data Investigation ral Ave. Everett, WA	Log of Bo	oring No.	FA-SB05
BORIN					vve (West Right-of-Way)	ELEVATION AND DA	TUM:	
DRILLI	NG C	ON	ΓRAC	TOR: Cas	cade Drilling, Inc.	DATE STARTED: 10/24/13	10/24/1	
DRILLI	NG M	ETH	HOD:	Hollow	-stem auger	TOTAL DEPTH (ft.): 20.0	Ground	RING POINT: I Surface
DRILLI	NG E	QUI	PMEN	NT: CME 7	75	DEPTH TO WATER (ft	t.) FIRST NA	COMPL. NA
SAMPI	ING N	MET	HOD	Modified	California drive sampler [18" x 2.5"]	LOGGED BY: J. Bellamy, LG		
IAMM	ER W	'EIG	HT:	300 lb	DROP: 30 in	RESPONSIBLE PROF	FESSIONAL:	REG. NO. L.Hg. 1354
DEPTH (feet)	Sample S No.			OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., plast. cementation, react. w/HCl, geo.	density, structure, inter.		REMARKS
<u> </u>	San	San	Blows/ Foot	RE/	Surface Elevation: NA	Ą		
_					SILTY SAND (SM): dark gray (10YR 4/1), m medium sand, 30% fines, 5% fine subrounded	noist, 65% fine to ed gravel (up to 0.75").	_	
1-							_ Cleared _ vacuum	to 8 feet bgs with truck.
2-								5-4-102413 is
3-							_ 8 FT.	
4-	2413						_	
5-	FA-SB05-4-102413			0.0			_	
-	FA-SI				Wet @ 5.5 FT.			
6-								
7-							- -	
8-			7	1.0	SILTY SAND (SM): dark gray (10YR 4/1), m medium sand, 30% fines, 5% fine subrounded	ed gravel (up to 0.75"),	No shee	n.
9-			5 8		mixed with PEAT reddish brown (2.5YR 2.5/	3).	- No shee	n.
10-			12	0.3 0.3	WELL-GRADED SAND with SILT (SW-SM): wet, loose, 85% fine to medium sand, 10% fi subrounded gravel.		No shee	
- 11-			9	0.5	subrounded graver.		_	
- 12-			8 7				No shee	11.
-		<u> </u>	9	0.3 0.3			No shee	n.
13 <i>-</i> -		X	6 7		— wet, loose, 75% fine to medium sand, 10% fi	ines. 15% fine	No shee	n.
14 -			9	27.9	subrounded gravel.		_ No shee	n.
15-		<u> </u>	5					OAKBOREV (REV. 8/2011)
		â	med	-O-		Project No. 3	9115716G.02	Page 1 of 2

Log of Boring No. FA-SB05 (cont'd)

	A B 4 D I	<u> </u>				
(feet)	No. Sample	Blows/ CT Foot	OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., plast. density, structure, cementation, react. w/HCl, geo. inter.		REMARKS
16 -	X	7 9 6 6 9	0.3 8.9	WELL-GRADED SAND with SILT (SW-SM): very dark gray (10YR 3/1), wet, loose, 85% fine to medium sand, 10% fines, 5% fine subrounded gravel, hydrogen sulfide-like odor.		o sheen.
17 – – 18 –		7 7	10.1		- - -	o sheen.
-		5 6	1.6	PEAT (PT): reddish brown (2.5YR 2.5/3), wet, medium stiff, 100% organics, with pieces of wood.	_	o sheen.
19	X	11 14 16	5.9	WELL-GRADED SAND with SILT (SW-SM): very dark gray (10YR 3/1), wet, medium dense, 90% fine to medium sand, 10% fines, plant debris, hydrogen sulfide-like odor. Bottom of Boring @ 20 FT. Abandoned with bentonite to surface.	No	o sheen.
21-						
22 – –					_	
23-					_	
24 – – 25 –					_	
26-						
27 –						
28-						
29-						
30						
32-						
33						OAKBOREV (REV. 8/2011)
	·	me	co	Project No.	39115716G	.02 Page 2 of 2

PROJI	ECT:				C Final Data Investigation eral Ave. Everett, WA		Log of Bor	ing	No. F	A-SB06
BORIN	IG LO				Ave (West Right-of-Way)	ELE NA	VATION AND DATU	JM:		
DRILL	ING C	CNO	ΓRAC	TOR: Cas	cade Drilling, Inc.	DAT 10/2	E STARTED: 25/13		DATE FIN 10/25/13	
DRILL	ING M	IETH	HOD:	Hollow	v-stem auger	20.0	TAL DEPTH (ft.):	MEASURING POINT Ground Surface		
DRILL	ING E	QUII	PME	NT: CME 7		DEF	PTH TO WATER (ft.)		FIRST NA	COMPL. NA
SAMP	LING	MET	HOD	: Modified	California drive sampler [18" x 2.5"]		GGED BY: Sellamy, LG			-
HAMN				300 lb	DROP: 30 in	RES	SPONSIBLE PROFE n Long	SSIC	NAL:	REG. NO. L.Hg. 1354
DEPTH (feet)	Sample S No.	Sample TO	Blows/ ST Foot	OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., plas cementation, react. w/HCl, geo Surface Elevation:	t. density, s . inter. IA	structure,		RI	EMARKS
					Asphalt (0.5 inches).					
1- 2- 3-					SILTY SAND (SM): dark yellowish brown (fine to medium sand, 30% fines, 10% fine s 0.75"), cobbles present.			_ _ _	vacuum tru FA-SB06-4	5 feet bgs with lick. 102513 is om interval 0 to
4-	FA-SB06-4-102513			0.4				_ _ _		
5-	FA-SB0		3	0.8	Wet @ 5 FT.			_	No sheen.	
6-	2513		2 4	31.2	WELL-GRADED SAND with SILT (SW-SM) 3/1), wet, loose, 85% fine to coarse sand, 1				Sheen, pet hydrocarbo	roleum on-like odor.
8-	FA-SB06-7.5-1025	X	4 6 5	55 42	subrounded gravel (up to 0.75").	0 /0 mics, v	070 IIIIC		Sheen, pet hydrocarbo	roleum on-like odor.
9-	FA-SB(7 6	12						n-like odor.
10-	_		6	35 33.9						on-like odor.
11-	-		9 10 10	2.6						n-like odor.
12-	_		5							n-like odor.
13-	-		6	20.9 20.7						n-like odor.
14-	-		10 11 12	2.6						n-like odor.
_			9	2.0					Sheen, pet hydrocarbo	roleum on-like odor.
15-	•			~			Desirate 001	4571		DAKBOREV (REV. 8/2011)
		ā	me	Ca			Project No. 391	15/16	0G.02	Page 1 of 2

Log of Boring No. FA-SB06 (cont'd)

SAMPLES SAMPLES SAMPL	or.
WELL-GRADED SAND with SILT (SW-SM): very dark gray (10YR 3/1), wet, medium dense, 85% fine to coarse sand, 10% fines, 5% fine subrounded gravel (up to 0.75"). Heaving sand. WELL-GRADED SAND with SILT (SW-SM): very dark gray (10YR 4 7.9 WELL-GRADED SAND with SILT (SW-SM): very dark gray (10YR 3/1), wet, loose, 60% fine to coarse sand, 30% fine subrounded whydrocarbon-like odd sales and subrounded and subrounded s	or.
Sheen, petroleum hydrocarbon-like odd WELL-GRADED SAND with SILT (SW-SM): very dark gray (10YR 3/1), wet, loose, 60% fine to coarse sand, 30% fine subrounded hydrocarbon-like odd hydrocarbon-like odd hydrocarbon-like odd	
7.9 3/1), wet, loose, over line to coarse said, 30% line subrounded mydrocarbon-like odd	n
20 – Section of Boring @ 20 Ft. Abandoned with bentonite to 1 FT bgs and cement to surface.	or.
21-	
22-	
24 -	
26 –	
28 –	
30-	
31- - - 32-	
OAKBOREV (REV	
amec Project No. 39115716G.02 Page 2 of 2	2

BORING LOCATION: Federal Ave (West Right-of-Way) NA	PROJE	CT:	Ex:	xonN 17/2	/lobil/AD0 731 Fede	C Final eral Ave	Data Investigation Everett, WA		L	og of Bor	in	g No. F	A-SB07
DATE STARTED: DATE FINSHED	BORIN	G LO	CAT	ION:	Federal A	Ave (Wes	st Right-of-Way)			ION AND DATU	JM:		
DRILLING EN HOLD: Pollow-stem auger 20.0 DEPTH TO WATER (it) FIRST COMPIL. NA NA NA NA NA NA NA N	DRILLII	NG C	ONT	ΓRAC	TOR: Cas	cade Dril	ling, Inc.		DATE ST 10/25/13	3		10/25/13	
Deficition Name N	DRILLII	NG M	ETH	HOD:	Hollow	v-stem au	uger		20.0 Ground Surface				
SAMPLING METHOD: Modified California drive sampler [18" x 2.5"] LOGGED 8": J. Bellamy, L.G	DRILLII	NG E	QUI	PMEN	NT: CME 7	75			DEPTH T	O WATER (ft.)			
HAMMER WEIGHT: 300 lb	SAMPL	ING I	MET	HOD	: Modified	Californ	ia drive sampler [18" x 2.5"]					1	1.0.1
NAME (USCS): color, moist, % by wir, plast, density, structure, cementation, react, which go, onler, so plant of the comentation, react, which go, onler, so plant of the comentation, react, which go, onler, so plant of the comentation, react, which go onler, so plant of the comentation, react, which go onler, so plant of the comentation, react, which go onler, so plant of the comentation, react, which go onler, so plant of the comentation on the comentation of th	HAMME	ER W	'EIG	HT:	300 lb		DROP: 30 in		RESPON	SIBLE PROFE	SSI	ONAL:	
The tomedium sand, 30% fines, 10% fine subrounded gravel (up to 0.75°). Cleared to 5 feet bgs with vacuum truck. FA-SB07-4-102513 is collected from interval 0 to 5 FT. No sheen.	DEPTH (feet)				OVM READING (ppm)	N.	AME (USCS): color, moist, % by w cementation, react. w/H	t., plast. den ICl, geo. inter	sity, struct ·.	ure,		R	EMARKS
Vacuum truck. FA-SB07-4-102513 is collected from interval 0 to 5 FT. No sheen.	1-					fine	to medium sand, 30% fines, 10%	orown (10YR 6 fine subrou	3/4), moi unded gra	st, 60% vel (up to	_	Cleared to	5 feet has with
Mosheen Nosh	_											FA-SB07-4	uck. 4-102513 is
Mosheen Nosh	_	SB01-4-102513											
Mosheen Nosheen Nosheen Nosheen		Ŗ	\bigvee	4	0.0	gra	ay (10YR 5/1), Wet @ 5 FT.				_	No sheen.	
7-	6-					. •		M SM): vor	ny dork arc	ov (10VP	_	No sheen.	
No sheen. 9	_			7		3/1), wet, loose, 85% fine to coarse s				_	No sheen, hydrocarbo	petroleum on-like odor.
10 -	_			6	0.5						_	No sheen.	
No sheen. 11	_										_		
12-	_		\bigvee	16	0.3						_		
9 0.1 0.2	12-										_		
14 9 9 0.3	13-			8							_		
15 OAKBOREV (REV. 8/2011)	14-			VI -	0.3						_		
OAKBOREV (REV. 8/2011)	15		\bigvee	9									
Project No. 39115716G.02 Page 1 of 2			ē	me	وم					Project No. 391	157 ⁻		Page 1 of 2

Log of Boring No. FA-SB07 (cont'd)

SAMPLE (teg) 16- 17- 18- 19- 20- 20- 21- 22- 23- 23- 24-	MNO WAY	COUNTY (bbm)	DESCRIPTION NAME (USCS): color, moist, % by wt., plast. density, structure, cementation, react. w/HCl, geo. inter. WELL-GRADED SAND with SILT (SW-SM): very dark gray (10YR	No she	REMARKS
17 - 18 - 19 - 20 - 20 - 23 - 23 - 23 - 25 - 25 - 25 - 25 - 25	10			No she	en
25 - 25 - 26 - 27 - 28 - 29 - 30 - 31 - 31 - 31 - 31 - 31 - 31 - 31	10 14 16	1.8	3/1), wet, loose, 85% fine to coarse sand, 10% fines, 5% fine subrounded gravel, rootlets, mixed with PEAT reddish brown (2.5YR 2.5/3). PEAT (PT): reddish brown (2.5YR 2.5/3), wet, stiff, mixed with POORLY-GRADED SAND with SILT, hydrogen sulfide odor. WELL-GRADED SAND with SILT (SW-SM): very dark gray (10YR 3/1), wet, medium dense, 85% fine to medium sand, 10% fines, 5% fine subrounded gravel, rootlets. Pieces of wood. WELL-GRADED SAND with SILT (SW-SM): very dark gray (10YR 3/1), wet, loose, 85% fine to medium sand, 10% fines, 5% fine subrounded gravel, rootlets. Bottom of Boring @ 20 FT. Abandoned with bentonite to surface.	No she	een. een. een.
32-					
33				_	
ar				_	OAKBOREV (REV. 8/2011)

	obil/ADC Final 31 Federal Ave	Data Investigation . Everett, WA	Log of Bori	ng No. K	C-SB01
BORING LOCATION: K	Kimberly Clark		ELEVATION AND DATUM	И :	
DRILLING CONTRACTO	DR: Cascade Dri	lling, Inc.	DATE STARTED: 10/30/13	DATE FINI 10/30/13	
DRILLING METHOD:	Hollow-stem a	uger	TOTAL DEPTH (ft.): 25.0	Ground S	
DRILLING EQUIPMENT	: CME 75		DEPTH TO WATER (ft.)	FIRST NA	COMPL.
SAMPLING METHOD: N	Modified Californ	ia drive sampler [18" x 2.5"]	LOGGED BY: J. Bellamy, LG		'
HAMMER WEIGHT: 3	300 lb	DROP: 30 in	RESPONSIBLE PROFES John Long	SIONAL:	REG. NO. L.Hg. 1354
Ceet) (feet) (sample No. Sample Sample Sample Foot Foot	COVM (ppm)	DESCRIPTION AME (USCS): color, moist, % by wt., plast. denotementation, react. w/HCl, geo. inter	sity, structure,	RI	EMARKS
SS SS BB		Surface Elevation: NA ELL-GRADED SAND with SILT and GRAVEL		_	
1- 2- 3- 3- 4- 8 5 2 5 5	0.1 0.2 WE 3/3 sub 0.3 0.1 0.1 WE 3/3 fine	ELL-GRADED SAND with SILT (SW-SM): dar), wet, loose, 85% fine to coarse sand, 10% fine unded to rounded gravel (up to 0.75"). ELL-GRADED SAND with SILT (SW-SM): dar), wet, loose, 85% fine to coarse sand, 10% fine unded to rounded gravel (up to 0.75").	rk brown (10YR nes, 5% fine	vacuum tru KC-SB01-1	
14 – 15 17 21 – 21 –	0.1			No sheen. No sheen.	
15 / 11				_	AKBOREV (REV. 8/2011)
amec	•		Project No. 3911		Page 1 of 2

Log of Boring No. KC-SB01 (cont'd)

		MPL	ES	Ŋ				
DEPTH (feet)	Sample No.	Sample	Blows/ Foot	OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., plast. density, structure, cementation, react. w/HCl, geo. inter.		R	EMARKS
		X	16 21	•			No sheen.	
16 -	-		19 20	0.1 0.2	WELL-GRADED SAND with SILT (SW-SM): very dark grayish brown (10YR 3/2), wet, medium dense, 90% fine to coarse sand, 10% fines. Heaving sand.	_	No sheen.	
17 –			21	0.2	ricaving sand.	_	No sheen.	
18 <i>-</i>	-	\bigvee	18 22 21	0.1		_	No sheen.	
19 – –	-		15 17	0.2		_	No sheen.	
20 -	-		19 18	0.1	WELL-GRADED SAND with SILT (SW-SM): very dark grayish brown (10YR 3/2), wet, medium dense, 85% fine to coarse sand, 10% fines, 5% fine subrounded to rounded gravel (up to 0.75").		No sheen.	
21 – – 22 –		$\left\langle \cdot \right\rangle$	22 24	0.2 0.2		_	No sheen.	
23-		\bigwedge	14 18 19		4 inch cobble stuck in shoe of split-spoon sampler.	_	No sheen.	
- 24 -	1013			0.3	OIL TV OAND (OM), dedeces (40)/D 5/0			
- 25 -	KC-SB01-25-103013	Å	20 20 24	0.2	SILTY SAND (SM): dark gray (10YR 5/3), wet, medium dense, 75% fine to medium sand, 25% fines.		No sheen.	
_ _ 26 –	KC-SB				Bottom of Boring @ 25 FT. Abandoned with bentonite to surface.	_		
27 –	-					_		
- 28 -	-					_		
- 29 -	-					_		
30 –						_		
31 –	-					_		
32-	_					_		
33-						_		OAKRODEV/PEV 6/2044)
		_	med	.	Project No	301157		Page 2 of 2
		100.02	1 aye 2 01 2					

PROJE	ECT: ExxonMobil/ADC Final Data Investigation 2717/2731 Federal Ave. Everett, WA						Log of Boring No. PE-SB02			
BORIN					rine (Port of Everett Leasehold Propert	y)	ELEVATION AN	D DATUM:		
DRILL	NG C	ONT	RAC	TOR: Case	cade Drilling, Inc.		DATE STARTED 10/22/13		DATE FIN 10/22/13	
DRILL	NG M	ETH	IOD:	Hollow	-stem auger		TOTAL DEPTH (ft.):	MEASURI Ground S	NG POINT: Surface
DRILL	NG E	QUII	PMEN	NT: CME 7	'5		DEPTH TO WAT	ER (ft.)	FIRST NA	COMPL. NA
SAMP	LING I	MET	HOD	: Modified	California drive sampler [18" x 2.5"]		LOGGED BY: J. Bellamy, LG		1.0.1	100
HAMM	ER W	EIG	HT:	300 lb	DROP: 30 in		RESPONSIBLE John Long	PROFESS	IONAL:	REG. NO. L.Hg. 1354
DEPTH (feet)	Sample No.	Sample T	Blows/ S Foot	OVM READING (ppm)	DESCRIPTI NAME (USCS): color, moist, % by v cementation, react. w/h Surface Elevation	vt., plast. den ICI, geo. inte	sity, structure,		R	EMARKS
					Asphalt (8 inches), base gravel (10 i	inches).				
1- 2- 3-				,	WELL-GRADED SAND with SILT (S 3/1), moist, 85% fine to medium san subrounded gravel (up to 0.75" in si	ıd, 10% fines	, 5% fine	R	Cleared to vacuum tru	5 feet bgs with ick.
4- 5- 6- 7- 8-	PE-SB02-7-102213		8 6 7 10 10	40 90.8 88 4.1	Wet @ 6 FT.			- - - - -	Sheen, free petroleum hydrocarbo	on-like odor
9-			5 5 5 10 9	4.7 2.2				- - - -	Sheen. No sheen. Sheen.	
11- - 12-			7 9 15	3.2 4.1	SILTY SAND (SM): very dark gray (No sheen.	
13 - - 14 -			10 9 10	1.3	to medium sand, 20% fines, 5% fine in size).				Sheen. No sheen.	
15-		<i>V</i> \	\						(OAKBOREV (REV. 8/2011)
		a	me	co.			Project	No. 391157	'16G.02	Page 1 of 2

Log of Boring No. PE-SB02 (cont'd)

S	SAMP	LFS	(D			
(feet)		Blows/	OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., plast. density, structure, cementation, react. w/HCl, geo. inter.		REMARKS
	\rightarrow	14				No sheen.
16-	X	15 9	1.3 1.1	SILTY SAND (SM): very dark gray (10YR 3/1), wet, medium dense, 65% fine to medium sand, 30% fines, 5% fine subrounded gravel (up to 0.75" in size), no sheen, hydrogen sulfide-like odor.		No sheen.
17-		10 12	4			No sheen.
18-	X	12 13 14			_	No sheen.
19 - 61		11 10	0.6		_	No sheen.
19		14		Bottom of Boring @ 20 FT. Abandoned with bentonite to 1 FT bgs and cement to surface.		
21-					_	
22-						
23-					_	
24 –					_	
25 – –					-	
26 –					-	
27 –					_	
28-					_	
29 – –					_	
30 -					_	
31 –					_	
32-					_	
33						OAKBOREV (REV. 8/2011)
		ame	co.	Project No.	391157	716G.02 Page 2 of 2

PROJE	CT:	Exx 271	onN 7/2	Mobil/AD0 731 Fede	Final Data	Investigation ett, WA		L	og of Bor	in	g No. Pl	E-SB03
BORING	G LO	CATI	ON:	Vigor Ma	rine (Port of Ev	verett Leasehold Prope	rty)	ELEVAT NA	ION AND DATU	JM:		
DRILLIN	IG C	ONT	RAC	TOR: Case	cade Drilling, I	nc.		DATE ST 10/22/13			DATE FINI 10/22/13	
DRILLIN	IG M	ETH	OD:	Hollow	-stem auger			20.0	DEPTH (ft.):		Ground S	NG POINT: urface
DRILLIN	IG E	QUIF	PMEN	NT: CME 7	5			DEPTH 1	O WATER (ft.)		FIRST NA	COMPL. NA
SAMPLI	ING I	METI	HOD	: Modified	California driv	e sampler [18" x 2.5"]		LOGGEI J. Bellai			1	1.0.1
HAMME	R W	EIGH	HT:	300 lb	DRO	P: 30 in			SIBLE PROFE	SSI	ONAL:	REG. NO. L.Hg. 1354
DEPTH (feet)	Sample No.	Sample	Blows/ Si Foot	OVM READING (ppm)	NAME (I	DESCRIP JSCS): color, moist, % by cementation, react. w Surface Elevat	wt., plast. den HCl, geo. inter	sity, struct	ure,		RI	EMARKS
					Asphalt (5	inches), base gravel (18	3 inches).					
1- 2-					WELL-GF 3/1), mois	ADED SAND with SILT t, 95% fine to medium sa	(SW-SM): ver and, 5% fines.	y dark gra	ay (10YR		Cleared to vacuum tru	5 feet bgs with ck.
3- 4- 5- 6- 7-	PE-SB03-5-101613		8 20 12 8 7	46 44 13.1 18	Wet @ 5.	25 FT.					Sheen, free petroleum hydrocarbo Sheen, free petroleum hydrocarbo Sheen, pet hydrocarbo	n-like odor product, n-like odor roleum
8- - 9- 10- - 11- - 12- - 13- - 14-			6 6 10 10 3 4 6 8 9 12 6 8 8	3.8 22 2.4 1.6 1.1 1.0		ADED SAND with SILT loose, 95% fine to mediu					Sheen, pet hydrocarbo Sheen, pet hydrocarbo Sheen, pet hydrocarbo No sheen No sheen No sheen No sheen	n-like odor roleum n-like odor roleum n-like odor
15				-0					Droig at N = 004	157		AKBOREV (REV. 8/2011)
		a	me	C.					Project No. 391	15/	10G.02	Page 1 of 2

Log of Boring No. PE-SB03 (cont'd)

DEPTH (feet)	Sample No.	_	Blows/ S Foot	OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., plast. density, structure, cementation, react. w/HCl, geo. inter.		REMARKS
- 16-		X	10 10 7	3.1 1.0	SANDY SILT (ML): very dark brown (10YR 2/2), wet, no plasticity, medium stiff, 65% fines, 35% fine sand, trace wood debris, hydrogen sulfide-like odor.	No st	
17-		$\left \right\rangle$	9	2.4	SILTY SAND (SM): very dark gray (10YR 3/1), wet, loose, 80% fine	 No sh	
18-		\mathbb{X}	8 7 8	0.0	to medium sand, 20% fines, hydrogen sulfide-like odor. SANDY SILT (ML): dark brown (10YR 3/3), wet, no plasticity,	 No sh	neen
19-	-102213	V	9	0.6 1.5	loose, 70% fines, 30% fine to medium sand, hydrogen sulfide-like odor.	_ _ No sh	neen
20 -	PE-SB03-20-102213		10		Bottom of Boring @ 20 FT. Abandoned with bentonite to 1 FT bgs and cement to surface.		
21 –						_	
22-						-	
23 – – 24 –						_	
25 –						_	
26 –						_	
27 –						_	
28-						_	
29-						_	
30 -						_	
31 –						_	
32-						-	
33⊥			•	<u> </u>			OAKBOREV (REV. 8/2011)
		а	me	ço.	Project No.	39115716G.02	Page 2 of 2

PROJE					C Final Data Investigation eral Ave. Everett, WA	Log of Bo	Boring No. PE-SB04			
BORIN	G LO	CAT	ION:	Port of E	verett	ELEVATION AND DAT	TUM:			
DRILLI	NG C	ONT	RAC	TOR: Case	cade Drilling, Inc.	DATE STARTED: 10/22/13		DATE FIN 10/22/13	ISHED:	
DRILLI	NG M	ETH	IOD:	Hollow	y-stem auger	TOTAL DEPTH (ft.): 20.0		Ground S		
DRILLI	NG E	QUIF	PMEN	NT: CME 7	'5	DEPTH TO WATER (ft	i.)	FIRST NA	COMPL. NA	
SAMPI	ING I	МЕТ	HOD	Modified	California drive sampler [18" x 2.5"]	LOGGED BY: J. Bellamy, LG			,	
HAMM	ER W	EIGI	HT:	300 lb	DROP: 30 in	RESPONSIBLE PROF	ESSI	ONAL:	REG. NO. L.Hg. 1354	
DEPTH (feet)	Sample S No.	Sample TO	Blows/ C Foot	OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., plast. cementation, react. w/HCl, geo.	. density, structure, . inter.		R	EMARKS	
	Š	ιχ	В	∝	Surface Elevation: N. Asphalt (6 inches), base gravel (12 inches).		_			
1- 2- 3-					SILTY SAND (SM): very dark gray (10YR 3 fine to coarse sand, 25% fines, 10% fine sub 0.75" in size), wood debris.	v/1), moist, loose, 65%	- - - -	vacuum tru		
4- 4- 5-	PE-SB04-102213		4	0.0 4.6			- - -	No sheen.		
6- - 7-			4 5 2	0.2 3.4	Wet @ 7.0 FT.			No sheen.		
8- - 9-			3 6	0.3	WELL-GRADED SAND with SILT (SW-SM): 3/1), wet, loose, 90% fine to medium sand, 2 SANDY SILT (ML): dark brown (10YR 3/3), medium stiff, 60% fines, 40% fine to medium (possible railroad tie).	10% fines. wet, no plasticity,		Sheen.		
- 10 -			8 10 4 4	0.0 0.0	WELL-GRADED SAND with SILT (SW-SM): 3/1), wet, loose, 90% fine to medium sand, // Pieces of wood. WELL-GRADED SAND with SILT (SW-SM):	10% fines. : very dark gray (10YR		No sheen.		
11-			5	0.0	3/1), wet, loose, 90% fine to medium sand, 7	10% fines.		No sheen.		
12- - 13-			6 6	1.9 0.4			- - -	No sheen.		
14-		X	4 3 6	0.9	SANDY SILT (ML): very dark brown (10YR medium stiff, 70% fines, 30% fine sand, woo sulfide odor.		_	No sheen.		
15-		<u>/ \</u>							DAKBOREV (REV. 8/2011)	
		а	med	.o		Project No. 3	91157	16G.02	Page 1 of 2	

Log of Boring No. PE-SB04 (cont'd)

_		MPLI		<u>o</u>				
DEPTH (feet)	Sample No.	Sample	Blows/ Foot	OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., plast. density, structure, cementation, react. w/HCl, geo. inter.		R	EMARKS
16-		X	7 7 7 9	1.0 9.0	SANDY SILT (ML): very dark brown (10YR 2/2), wet, no plasticity, medium stiff, 70% fines, 30% fine sand, wood debris, hydrogen sulfide odor.	-	No sheen. No sheen.	
17 <i>-</i> -			9	0.1	SILTY SAND (SM): very dark gray (10YR 3/1), wet, medium dense, 60% fine to coarse sand, 40% fines, hydrogen sulfide odor.		No sheen.	
18 <i>-</i>		$\left \right\rangle$	18 14	0.1	SANDY SILT (ML): dark yellowish brown (10YR 4/4), wet, no plasticity, stiff, 70% fines, 30% fine sand, wood debris, hydrogen sulfide odor.	/-	No sheen.	
19 <i>-</i>	PE-SB04-102213	X	14 17		SILTY SAND (SM): very dark gray (10YR 3/1), wet, medium dense, 60% fine to coarse sand, 40% fines, hydrogen sulfide odor.	_	No sheen.	
20 –	PE-SBC		21		SANDY SILT (ML): very dark gray (10YR 3/1), wet, no plasticity, stiff, 70% fines, 30% fine sand, wood debris, hydrogen sulfide odor. Bottom of Boring @ 20 FT. Abandoned with bentonite to 1 FT bgs		-	
21 – –					and cement to surface.		-	
22 <i>-</i> -							-	
23-							-	
24 –							-	
25-							-	
26 –							-	
27 – – 28 –							-	
29-							-	
30-								
31 –							-	
32-								
33							-	
				•				AKBOREV (REV. 8/2011)
		а	me	c _O	Project No.	391157	716G.02	Page 2 of 2

PROJE	ECT:				DC Final Data Investigation		Log of Well	No. MW-A8
BORIN	IG LC	DCA ⁻	TION:	Dunla	p Towing (Port of Everett Leasehold Property)		CASING ELEVATION Surface	N AND DATUM:
DRILL	NG (CON	TRAC	TOR: (Cascade Drilling, Inc.	DATE ST 10/29/1	3	DATE FINISHED: 10/28/13
DRILL	NG N	ИΕΤ	HOD:	Hollow	<i>y</i> -stem auger	15.5	PEPTH (ft.):	SCREEN INTERVAL (ft.): 5-15
DRILL	NG E	EQU	IPME	NT: CM	NE 75	WATER (f		
SAMP	LING	ME	THOD	: Modif	ied California drive sampler [18" x 2.5"]	J. Bella	my, LG	
HAMM					DROP: 30 in	John Lo	ISIBLE PROFESSIO	NAL: REG. NO. L.Hg. 1354
DEPTH (feet)	Sample No.	Sample	Blows/ Foot	OVM Reading	DESCRIPTION NAME (USCS): color, moist, % by wt., plast. density, cementation, react. w/HCl, geo. inter.	structure,		LL CONSTRUCTION DETAILS ND/OR DRILLING REMARKS
۵	Sar	Sar	ᄦᅹ		Surface Elevation: NA			
					Asphalt (6 inches).		Tr	raffic Rated Well Box
1- - 2-					WELL-GRADED SAND with SILT (SW-SM): dari (10YR 3/3), moist, 80% fine to coarse sand, 10% 10% fine subrounded gravel (up to 0.75"), cobble metal pieces. FILL.	fines,		Portland Cement 2"Schedule 40 PVC Well Casing 8-inch diameter borehole
3- -	-							Hydrated Bentonite Chip Seal
4 – –								2" Schedule 40 PVC Well casing
5- -	913		8 6 6	0.1				
6-	-6-102	//		0.2				
7-	MW-A8-6-102913		22 30 30	0.3				
8-			9	0.1				
- 9-	-		8 6		SILTY SAND (SM): dark brown (10YR 3/3), moiloose, 75% fine to coarse sand, 25% fines, 5% fir subround gravel. FILL.			
_			9	0.0	WELL-GRADED SAND with SILT (SW-SM): dark			#2/12 Colorado Silica
10-		\bigvee	20 21	0.0	(10YR 3/3), moist, medium dense, 80% fine to co sand, 10% fines, 10% fine subrounded gravel (up 0.75").			Sand 2" Schedule 40 PVC
- 11-			18 21 22	0.0	5.75 j.			Well casing (0.010 slot)
12-								
13-			22 28 31	0.0	Cobble at 12.5 FT to 13 Ft.			
14-			20 21 24	0.4	brown (10YR 4/3), WET @ 13.5 FT.			
-	1		24	0.1				
15-							1 15,534 15,534	OAKWELLV_TOC (REV. 8/2011)
			ame	co C			Project No. 39115716G	.02 Page 1 of 2

PROJECT: ExxonMobil/ADC Final Data Investigation 2717/2731 Federal Ave. Everett, WA Log of Well No. MW-A8 (cont'd) SAMPLES OVM Reading WELL CONSTRUCTION Sample **DESCRIPTION** Blows/ Foot NAME (USCS): color, moist, % by wt., plast. density, structure, cementation, react. w/HCl, geo. inter. DETAILS AND/OR DRILLING REMARKS 2" Schedule 40 PVC WELL-GRADED SAND with SILT (SW-SM): dark brown MW-A8-15-10291 (10YR 3/3), moist, medium dense, 80% fine to coarse endcap sand, 10% fines, 10% fine subrounded gravel (up to 16 0.75"). Bottom of Boring @ 15.5 FT. 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 OAKWELLV_TOC (REV. 8/2011)

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Project No. 39115716G.02

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PROJE	CT:	Ex: 27	xonN 17/2	Mobil/AD0 731 Fede	C Final Data Investigation eral Ave. Everett, WA	Log of Bo	oring No. BN-SB08
BORIN	G LO	CAT	ION:	BNSF Pr	operty	ELEVATION AND DAT	ГИМ:
DRILLI	NG C	ОИТ	ΓRAC	TOR: Cas	cade Drilling, Inc.	DATE STARTED: 2/4/14	DATE FINISHED: 2/10/14
DRILLI	NG M	ETH	HOD:	Hollov	v-stem auger	TOTAL DEPTH (ft.): 20.0	MEASURING POINT: Ground Surface
DRILLI	NG E	QUII	PME	NT: CME	75	DEPTH TO WATER (ft.)	.) FIRST COMPL. NA
SAMPI	_ING I	МЕТ	HOD	: Modified	California drive sampler [18" x 2.5"]	LOGGED BY: J. Bellamy, LG	PEO NO
HAMM				300	DROP: 30	RESPONSIBLE PROFE John Long	ESSIONAL: REG. NO. L.Hg. 1354
DEPTH (feet)	Sample Sample No.	Sample	Blows/ G Foot	OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., plast. de cementation, react. w/HCl, geo. inte	er.	REMARKS
1— 2— 3— 4— 5— 6— 7— 10— 11— 12— 13—	BN-SB08-5.5-020414		6 7 8 5 6 6 10 13 12 15 11 10 5 11 10 5 11 10 10 10 10 10 10 10 10 10 10 10 10	0.0 0.2 0.1 0.2 0.3 0.2 0.3	WELL-GRADED SAND with SILT (SW-SM): dx (10YR 3/4), moist, 75% fine to coarse sand, 15′ subrounded gravel (up to 0.75″ in size). FILL. Wet at 5.5′. Trace wood debris. POORLY-GRADED SAND (SP): very dark gray 3/2), wet, medium dense, 95% fine to medium size). Similar to above but with trace fine subangular size). WELL-GRADED SAND with GRAVEL (SW): vx brown (10YR 3/2), wet, medium dense, 80% fine 15% fine subrounded gravel (up to 1″ in size), 50 coarses and, 15′ size).	yish brown (10YR sand, 5% fines. gravel (up to 0.75" in ery dark grayish se to coarse sand,	Cleared to 5.5 feet bgs with vacuum truck. Sheen No Sheen No Sheen No Sheen No Sheen No Sheen No Sheen No Sheen No Sheen No Sheen No Sheen
 14 			13 9	0.1	WELL-GRADED SAND (SW): very dark grayis wet, medium dense, 90% fine to coarse sand, 5 gravel (up to 1" in size), 5% fines.		No Sheen
15-		\	10				OAKBOREV (REV. 8/2011)
		ā	me	co		Project No. 61	

Log of Boring No. BN-SB08 (cont'd)

DEPTH (feet) Sample No. Sample Blows/ Foot	OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., plast. density, structure, cementation, react. w/HCl, geo. inter.	F	REMARKS
16 - 12 15 15 17 - 12 11 18 - 15 16 16 16 20 - 10 12 13 14 14 12 13 14 14 15 15 16 16 16 16 16 16 16 16 16 16 16 16 16	0.3 0.4 0.4 0.3 0.3 0.5 0.5	POORLY-GRADED SAND (SP): dark yellowish brown (10YR 4/4), wet, medium dense, 95% fine to coarse sand, 5% fines, trace subrounded gravel (up to 1" in size). SILTY SAND (SM): dark yellowish brown (10YR 4/4), wet, medium dense, 75% fine to medium sand, 25% fines. SANDY SILT (ML): very dark gray (10YR 3/1), wet, no plasticity, medium stiff, 70% fines, 30% fine sand, trace fine subrounded gravel (up to 1" in size). SILT (ML): very dark gray (10YR 3/1), wet, no plasticity, stiff, 95% fines, 5% fine sand, trace fine subrounded gravel (up to 0.75" in size), trace shells. Bottom of Boring @ 24.0 FT. Abandoned with bentonite to surface.	No Sheen No Sheen No Sheen No Sheen No Sheen No Sheen No Sheen	
30 – - 31 – -			- - - -	
32- 33	20	Project No.		OAKBOREV (REV. 8/2011) Page 2 of 2

PROJE					Final Data Investigation ral Ave. Everett, WA	Log of Bo	orin	g No. B	N-SB09
BORIN				BNSF Pro	·	ELEVATION AND DAT	TUM:		
DRILLI	NG C	ONT	RAC	TOR: Casc	ade Drilling, Inc.	DATE STARTED: 2/4/14		DATE FIN 2/10/14	
DRILLI	NG M	ETH	IOD:	Hollow-	stem auger	TOTAL DEPTH (ft.): 20.0		Ground S	
DRILLI	NG E	QUII	PMEN	NT: CME 7	5	DEPTH TO WATER (ft	.)	FIRST NA	COMPL. NA
SAMPI	ING N	MET	HOD	: Modified (California drive sampler [18" x 2.5"]	LOGGED BY: J. Bellamy, LG			
HAMM	ER W			300	DROP: 30	RESPONSIBLE PROF	ESSI	ONAL:	REG. NO. L.Hg. 1354
DEPTH (feet)	Sample S No.	_		OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., pla cementation, react. w/HCl, ge	ast. density, structure, eo. inter.		R	EMARKS
	San	San	Blows/ Foot	REA (REA	Surface Elevation:	NA			
- 1-					WELL-GRADED GRAVEL with SAND (G' to coarse subrounded gravel (up to 3" in s sand, 5% fines. FILL.		_		
- 2-							_	Cleared to vacuum tre	9 feet bgs with uck.
_					Wet @ 2 FT.		_		
3-					Filter fabric observed at 3 FT.		_		
4-									
_							_		
5 – –							_		
6-							-		
7-							-		
8-	1414				WELL-GRADED SAND with SILT (SW-SI (10YR 3/4), wet, medium dense, 70% fine	to coarse sand, 15% fine			
9-	BN-SB09-9-020414			0.1	subrounded gravel (up to 0.75" in size), 1	5% fines.	_	N. O.	
_	BN-S						-	No Sheen	
10 – –			1	0.3 0.4	Heaving Sand.		-	No Sheen	
11-			15 21	0.3			-	No Sheen	
12-			13 25				_	No Sheen	
13-		<u> </u>	20	0.2 0.2			_	No Sheen	
14-		$ \setminus$	19 20 15				_	No Sheen	
		$\overline{}$, 13	0.2			\top		
- 15-		\perp	!						

Log of Boring No. BN-SB09 (cont'd)

		MPLE	ΞS	ڻ ن	<u> </u>			
DEPTH (feet)	Sample No.	Sample	Blows/ Foot	OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., plast. density, structure, cementation, react. w/HCl, geo. inter.		F	REMARKS
16-	_		6 12 12	0.3	POORLY-GRADED SAND (SP): dark yellowish brown (10YR 3/4), wet, medium dense, 95% fine to medium sand, 5% fines, trace subrounded gravel (up to 0.75" in size). POORLY-GRADED SAND (SP): dark yellowish brown (10YR 3/4),	_	No Sheen	
- 17 -	_	$\left \cdot \right $	9 14	0.4	wet, medium dense, 95% fine to medium sand, 5% fines, trace subrounded gravel (up to 0.75" in size).	_	No Sheen	
18-	-		10 14	0.3		_	No Sheen	
19-		$\mid \cdot \mid$	17 21	0.5 0.5		_	No Sheen	
20 -		\geq	10 12 12	0.2		_	No Sheen	
21 -	-		15 15	V.E		-		
22-	_		15	0.3 0.3		_		
23-	BN-SB09-24-021014		17 22 20	0.3				
24 -	BN-SB09-		20 20 20			_		
25 -	-		20		Bottom of Boring @ 25.0 FT. Abandoned with bentonite to surface.			
26 – – 27 –								
28-						_		
29-	-							
30-	_					_		
31-	-							
32-								
33-								04//DDD1//==
		_			D : 11	210044	000	OAKBOREV (REV. 8/2011)
amec [©] Project No. 6103								Page 2 of 2

PROJE					C Final Data Investigation eral Ave. Everett, WA		Log of Bor	inç	g No. K	C-SB02
BORIN				Kimberly	·	ELEV/	ATION AND DATU	IM:		
DRILLI	NG C	ONT	RAC	TOR: Caso	cade Drilling, Inc.		STARTED:		DATE FIN 2/10/14	IISHED:
DRILLI	NG M	ETH	OD:	Limited	d Access Hollow-stem auger	TOTAI 20.0	L DEPTH (ft.):		Ground S	
DRILLI	NG E	QUIF	PMEN	NT: CME 5	55 modified	DEPT	H TO WATER (ft.)		FIRST NA	COMPL.
SAMPL	ING N	ИЕТІ	HOD:	: Modified	California drive sampler [18" x 2.5"]		ED BY: lamy, LG		•	
HAMM	ER W	EIGI	HT:	150	DROP: 30	RESP John	ONSIBLE PROFE	SSI	ONAL:	REG. NO. L.Hg. 1354
DEPTH (feet)	Sample Son No.	Sample T	Blows/ (%) Foot	OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., p cementation, react. w/HCl, g Surface Elevation:	last. density, stru			R	EMARKS
-					Asphalt (4 Inches)			Ħ		
1- - 2-					POORLY-GRADED SAND (SP): very days fine to medium sand, 5% fines, trace fine subrounded gravel (up to 0.75" in size	e coarse sand a		_ _ _ _	Cleared to vacuum tru	5 feet bgs with uck.
3-	414							_ _ _ _		
_	5-020			6.3						
5-	KC-SB02-5-020414		•	0.2	Wet @ 5 FT.			_	Trace She	en
6-	KC-SB02-7-021014	\searrow	8 6 8	0.0	SILTY SAND (SM): very dark gray (10Y to medium sand, 20% fines, 5% fine sub size).				No Sheen	
7- -	KC-SB0		6		PEAT (PT): reddish brown (2.5YR 2.5/3 with SANDY SILT (SM).), wet, medium	stiff, mixed	_	No Sheen	
8-		\bigcap	9	0.7 0.0	POORLY-GRADED SAND (SP): very da loose, 95% fine to medium sand, 5% fine		3/1), wet,		No Sheen	
9-		\square	10 10	0.1				_	No Sheen	
10 – –		$\left \cdot \right $	14 28						No Sheen	
11-		$\mid \mid \mid$	30 20	0.4 0.2					No Sheen	
12 – –			20 20 20	0.4	POORLY-GRADED SAND (SP): very da	ark aray (10VD	3/1) wet	- -	No Sheen	
13 <i>-</i>			15 19		medium dense, 95% fine to coarse sand subrounded gravel (up to 0.75" in size).			- -	No Sheen	
14 – –		X	21	0.2 0.3					No Sheen	
15-			med	.			Project No. 6103	3140		Page 1 of 2

Log of Boring No. KC-SB02 (cont'd)

	SV	MPL	F.S.					
DEPTH (feet)	Sample No.		Blows/ C Foot	OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., plast. density, structure, cementation, react. w/HCl, geo. inter.		F	REMARKS
			15 15	0.2			No Sheen	
16-			16 17				No Sheen	
17 <i>-</i>			17	0.0 0.5	POORLY-GRADED SAND (SP): very dark gray (10YR 3/1), wet, medium dense, 95% fine to coarse sand, 5% fines, trace subrounded gravel (up to 0.75" in size) mixed with PEAT (PT), hydrogen sulfide odor.	_	No Sheen	
18-			15 18 23	0.0	.,g	_	No Sheen	
19-	-021014		7	11.0	PEAT (PT): reddish brown (2.5YR 2.5/3), wet, medium stiff.		No Sheen	
20 –	KC-SB02-20-021014		12		Bottom of Boring @ 20.0 FT. Abandoned with bentonite to 2 FT bgs and cement to surface.		No Sheen	
21-	, <u>x</u>					_		
22-						_		
23-								
24 –						-		
25 –						_		
26-						_		
27 –						_		
28-								
29-						-		
30-						-		
31-						-		
32-								
33-								OAKBOREV (REV. 8/2011)
		а	me	0	Project No	. 610314		Page 2 of 2

					C Final Data Investigation ral Ave. Everett, WA	Log of Bo	ring No. F	PE-SB05
BORIN	G LO	CAT	ION:	Dunlap T	owing (Port of Everett Leasehold Property)	ELEVATION AND DAT	UM:	
DRILLI	NG C	ONT	RAC	TOR: Caso	cade Drilling, Inc.	DATE STARTED: 2/4/14	DATE FI 2/7/14	NISHED:
DRILLI	NG M	ETH	OD:	Hollow	-stem auger	TOTAL DEPTH (ft.): 20.0	Ground	RING POINT: Surface
DRILLI	NG E	QUII	PMEN	NT: CME 7	75	DEPTH TO WATER (ft.) FIRST NA	COMPL. NA
SAMPI	ING I	MET	HOD:	: Modified	California drive sampler [18" x 2.5"]	LOGGED BY: J. Bellamy, LG		250.00
HAMM	ER W	EIG	HT:	300	DROP: 30	RESPONSIBLE PROF John Long	ESSIONAL:	REG. NO. L.Hg. 1354
DEPTH (feet)	Sample No.	Sample	Blows/ C Foot	OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., plast. do cementation, react. w/HCl, geo. in Surface Elevation: NA			REMARKS
_					Asphalt (5 inches)			
1- 2- 3-					SILTY SAND with GRAVEL (SM): dark yellow 3/4), moist, 65% fine to coarse sand, 20% fine (up to 0.75" in size), 15% fines. FILL.		Cleared t vacuum t	o 5 feet bgs with ruck.
4- 5- 6- 7-			5 5 5 50/6	4 0.6	WELL-GRADED SAND (SW): dark yellowish moist, loose, 95% fine to coarse sand, 5% fine WELL-GRADED SAND (SW): dark yellowish moist, loose, 90% fine to coarse sand, 5% fine subrounded gravel (up to 0.75" in size), wood of	s. FILL. brown (10YR 3/4), s, 5% fine	No Sheer No Sheer No Sheer	ı
8-	PE-SB05-9-021014		5	0.4 0.4			No Sheer	า
9-	PE-SB(5 7	0.3	SILTY SAND (SM): very dark gray (10YR 3/1) to medium sand, 20% fines.	, wet, loose, 80% fine	No Sheer	า
10 11 - 12			4 5 11 12 14 19	0.5 0.3	SANDY SILT (ML): very dark gray (10YR 3/1) 80% nonplastic fines, 20% fine to medium sangravel (up to 2" in size), wood debris (twigs), h SILTY SAND (SM): very dark gray (10YR 3/1) 80% fine to medium sand, 20% fines, trace fine cemented.	d, trace subrounded ydrogen sulifde odor. , wet, medium dense,	No Sheer No Sheer No Sheer	ı
13 – – 14 –			21 20 20	0.3 0.2	POORLY-GRADED SAND (SP): black (10YR dense, 95% fine to medium sand, 5% fines, tragravel, trace peat, yellow specks.		No Sheer	
15 –			16					OAKBOREV (REV. 8/2011)
		_	med	.0		Project No. 61	10314009	Page 1 of 2

Log of Boring No. PE-SB05 (cont'd)

(feet)	Sample ITAMA	Blows/ C Foot	OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., plast. density, struct cementation, react. w/HCl, geo. inter.	ture,	R	EMARKS
_		13 14	0.4	POORLY-GRADED SAND (SP): black (10YR 2/1), wet, med dense, 90% fine to medium sand, 5% nonplastic fines, 5% fill subrounded gravel (up to 0.75" in size).		No Sheen	
16-	$\left \cdot \right $	5 5 8	0.4	SILTY SAND (SM): very dark gray (10YR 3/1), wet, loose, 7 to medium sand, 30% nonplastic fines, trace subrounded gray to 0.75" in size).		No Sheen	
17-		6	0.4 0.3	SANDY SILT (ML): very dark gray (10YR 3/1), wet, medium 70% nonplastic fines, 30% fine to medium sand. POORLY-GRADED SAND (SP): very dark gray (10YR 3/1),		No Sheen	
18-		7 9	0.3	loose, 95% fine to medium sand, 5% nonplastic fines, trace to subrounded gravel. Trace wood debris mixed in POORLY-GRADED SAND (SP)	fine -	No Sheen	
19 05 PE-SB05-20-020714		6 9 12	0.4		, 	No Sheen	
20 – 908 – 34 21 –		.4		Bottom of Boring @ 20.0 FT. Abandoned with bentonite to 2 and cement to surface.	FT bgs	No Sheen	
21-						-	
23-						-	
24-					-	-	
_ 25-					-	-	
26-					-	-	
27 –					-	-	
28-					-	-	
29-					-	-	
30-					-	-	
31 –					-	-	
32-						-	
33							DAKBOREV (REV. 8/2011)
			0	T_			
	а	med	C-7	F	Project No. 61031	4009	Page 2 of 2

DRILLING EQUIPMENT: CME 75 DEPTH TO WATER (ft.) NA NA NA NA NA NA NA NA NA N	306
DRILLING CONTRACTOR: Cascade Drilling, Inc. DATE STARTED: 2/4/14 27/14	
DRILLING METHOD: Hollow-stem auger DRILLING EQUIPMENT: CME 75 SAMPLING METHOD: Modified California drive sampler [18" x 2.5"] DEPTH TO WATER (ft.) LOGGED BY: J. Bellamy, L.G RESPONSIBLE PROFESSIONAL: J. Bellamy, L.G RESPONSIBLE PROFESSIONAL: J. Den Long DESCRIPTION NAME (USCS): color, moist, % by wt., plast, density, structure, cementation, react, which caps on inter. Surface Elevation: NA Asphalt (5"" WELL-GRADED SAND with GRAVEL (SW): dark yellowish brown (10YR 3/4), moist, loose, gravel (up to 1" in size), Fill. Concrete rubble, filter fabric at 5". WELL-GRADED SAND (SW): dark yellowish brown (10YR 3/4), moist, loose, gravel (up to 2" in size), wood debris, Fill. No Sheen Sheen, trace properticeum hydrocarbon-like subrounded gravel (up to 1" in size), 5% nonplastic fines. WELL-GRADED SAND with GRAVEL (SW): very dark gray (10YR 3/1), moist, loose, gravel (up to 2" in size), wood debris, Fill. WELL-GRADED SAND with GRAVEL (SW): very dark gray (10YR 3/1), moist, loose, gravel (up to 2" in size), wood debris, Fill. WELL-GRADED SAND with GRAVEL (SW): very dark gray (10YR 3/1), moist, loose, gravel (up to 2" in size), wood debris, Fill. WELL-GRADED SAND with GRAVEL (SW): very dark gray (10YR 3/1), wet, medium dense, 80% fine to coarse sand, 15% fine subrounded subrounded gravel (up to 1" in size), 5% nonplastic fines. Sheen, trace properticeum hydrocarbon-like subrounded gravel (up to 1" in size), 5% nonplastic fines.	
DRILLING EQUIPMENT: CME 75 SAMPLING METHOD: Modified California drive sampler [18" x 2.5"] HAMMER WEIGHT: 300 DROP: 30 DESCRIPTION NAME (USCS): color, moist, % by wt., plast. density, structure, cementation, react. wirf-Cl. geo. inter. Surface Elevation: NA Asphalt (5" WELL-GRADED SAND with GRAVEL (SW): dark yellowish brown (10YR 3/4), moist, 3/4), moist, 7% fine to coarse sand, 15% fine subrounded gravel (up to 2" in size), wood debris, FILL. No Sheen No Sheen No Sheen Silty SAND (SM): dark yellowish brown (10YR 3/4), moist, loose, 75% fine to coarse sand, 20% nonplastic fines, 5% fine subrounded gravel (up to 2" in size), wood debris, FILL. WELL-GRADED SAND with GRAVEL (SW): very dark gray (10YR 3/4), moist, loose, 75% fine to coarse sand, 20% nonplastic fines, 5% fine subrounded gravel (up to 2" in size), wood debris, FILL. WELL-GRADED SAND with GRAVEL (SW): very dark gray (10YR 3/4), moist, loose, 75% fine to coarse sand, 20% nonplastic fines, 5% fine subrounded gravel (up to 2" in size), wood debris, FILL. Well-GRADED SAND with GRAVEL (SW): very dark gray (10YR 3/4), moist, loose, 75% fine to coarse sand, 20% nonplastic fines, 5% fine subrounded gravel (up to 2" in size), wood debris, FILL. No Sheen No Sheen Sheen, trace propertoleum hydrocarbon-like subrounded gravel (up to 1" in size), 5% nonplastic fines.	
SAMPLING METHOD: Modified California drive sampler [18" x 2.5"] HAMMER WEIGHT: 300 DROP: 30 DESCRIPTION NAME (USCS): color, molst, % by wt., plast. density, structure, cementation, react. whrici. geo. inter. Surface Elevation: NA Asphalt (5"* WELL-GRADED SAND with GRAVEL (SW): dark yellowish brown (10YR 3/4), moist, 10ose, 90% fine to coarse sand, 15% fine subrounded gravel (up to 1" in size), Fill. Concrete rubble, filter fabric at 5'. WELL-GRADED SAND (SW): dark yellowish brown (10YR 3/4), moist, loose, 90% fine to coarse sand, 10% nonplastic fines, Fill. No Sheen Siltry SAND (SM): dark yellowish brown (10YR 3/4), moist, loose, 75% fine to coarse sand, 20% nonplastic fines, 5% fine subrounded gravel (up to 2" in size), wood debris, Fill. Siltry SAND (SM): dark yellowish brown (10YR 3/4), moist, loose, 75% fine to coarse sand, 20% nonplastic fines, 5% fine subrounded gravel (up to 2" in size), wood debris, Fill. Wet @ 7 FT. WELL-GRADED SAND with GRAVEL (SW): very dark gray (10YR 3/1), wet, medium dense, 80% fine to coarse sand, 15% fine subrounded gravel (up to 2" in size), 5% nonplastic fines. Sheen Sheen Sheen trace properties and the file of the subrounded gravel (up to 1" in size), 5% nonplastic fines.	OMPL.
HAMMER WEIGHT: 300 DROP: 30 DROP: 30 DESCRIPTION NAME (USCS): color, moist, % by wt., plast, density, structure, cementation, react, wHCl, geo. inter. Surface Elevation: NA Asphalt (5*** WELL-GRADED SAND with GRAVEL (SW): dark yellowish brown (10YR 3/4), moist, 15% fine to coarse sand, 15% fine subrounded gravel (up to 1* in size), FILL. Concrete rubble, filter fabric at 5'. WELL-GRADED SAND (SW): dark yellowish brown (10YR 3/4), moist, loose, 90% fine to coarse sand, 10% nonplastic fines, FILL. No Sheen Siltty SAND (SM): dark yellowish brown (10YR 3/4), moist, loose, 75% fine to coarse sand, 20% nonplastic fines, 5% fine subrounded gravel (up to 2* in size), wood debris, FILL. Wet @ 7 FT. WELL-GRADED SAND with GRAVEL (SW): very dark gray (10YR 3/4), moist, loose, 75% fine to coarse sand, 15% fine subrounded gravel (up to 2* in size), wood debris, FILL. Wet @ 7 FT. WELL-GRADED SAND with GRAVEL (SW): very dark gray (10YR 3/1), wet, medium dense, 80% fine to coarse sand, 15% fine Subrounded gravel (up to 1* in size), 5% nonplastic fines. Sheen. Sheen.	`
NAME (USCS): color, moist, % by wft, plast density, structure, cementation, react. w/HCl, geo. inter. Surface Elevation: NA Asphalt (5"** WELL-GRADED SAND with GRAVEL (SW): dark yellowish brown (10YR 3/4), moist, 75% fine to coarse sand, 15% fine subrounded gravel (up to 1" in size), FILL. Concrete rubble, filter fabric at 5'. WELL-GRADED SAND (SW): dark yellowish brown (10YR 3/4), moist, loose, 90% fine to coarse sand, 10% nonplastic fines, FILL. No Sheen Sheen, trace propetroleum hydrocarbon-like Sheen WELL-GRADED SAND with GRAVEL (SW): very dark gray (10YR 3/1), wet, medium dense, 80% fine to coarse sand, 15% fine subrounded gravel (up to 1" in size), 5% nonplastic fines. Sheen, trace propetroleum Sheen Sheen Sheen Sheen Sheen Sheen, trace propetroleum Sheen	REG. NO. .Hg. 1354
Asphalt (5"" WELL-GRADED SAND with GRAVEL (SW): dark yellowish brown (10YR 3/4), moist, 75% fine to coarse sand, 15% fine subrounded gravel (up to 1" in size), FILL. Concrete rubble, filter fabric at 5'. WELL-GRADED SAND (SW): dark yellowish brown (10YR 3/4), moist, loose, 90% fine to coarse sand, 10% nonplastic fines, FILL. No Sheen SILTY SAND (SM): dark yellowish brown (10YR 3/4), moist, loose, 75% fine to coarse sand, 20% nonplastic fines, 5% fine subrounded gravel (up to 2" in size), wood debris, FILL. Wet @ 7 FT. WELL-GRADED SAND (SW): dark yellowish brown (10YR 3/4), moist, loose, 75% fine to coarse sand, 20% nonplastic fines, 5% fine subrounded gravel (up to 2" in size), wood debris, FILL. Wet @ 7 FT. WELL-GRADED SAND with GRAVEL (SW): very dark gray (10YR 3/1), wet, medium dense, 80% fine to coarse sand, 15% fine subrounded gravel (up to 1" in size), 5% nonplastic fines. Sheen, trace properticulum bydrocarbon-like subrounded gravel (up to 1" in size), 5% nonplastic fines.	KS
1 (10YR 3/4), moist, 75% fine to coarse sand, 15% fine subrounded gravel (up to 1" in size), FILL. Concrete rubble, filter fabric at 5'. WELL-GRADED SAND (SW): dark yellowish brown (10YR 3/4), moist, loose, 90% fine to coarse sand, 10% nonplastic fines, FILL. No Sheen Siltry Sand (sM): dark yellowish brown (10YR 3/4), moist, loose, 75% fine to coarse sand, 20% nonplastic fines, 5% fine subrounded gravel (up to 2" in size), wood debris, FILL. Wet @ 7 FT. WELL-GRADED SAND with GRAVEL (SW): very dark gray (10YR 3/1), wet, medium dense, 80% fine to coarse sand, 15% fine subrounded gravel (up to 1" in size), 5% nonplastic fines. Sheen. Sheen.	
Concrete rubble, filter fabric at 5'. 2.4 3.6 WELL-GRADED SAND (SW): dark yellowish brown (10YR 3/4), moist, loose, 90% fine to coarse sand, 10% nonplastic fines, FILL. No Sheen Siltry SAND (SM): dark yellowish brown (10YR 3/4), moist, loose, 75% fine to coarse sand, 20% nonplastic fines, 5% fine subrounded gravel (up to 2" in size), wood debris, FILL. Wetle-GRADED SAND with GRAVEL (SW): very dark gray (10YR 3/1), wet, medium dense, 80% fine to coarse sand, 15% fine subrounded gravel (up to 1" in size), 5% nonplastic fines. Sheen, trace propertically the subrounded gravel (up to 1" in size), 5% nonplastic fines. Sheen, trace propertically the subrounded gravel (up to 1" in size), 5% nonplastic fines.	bgs with
WELL-GRADED SAND (SW): dark yellowish brown (10YR 3/4), moist, loose, 90% fine to coarse sand, 10% nonplastic fines, FILL. No Sheen No Sheen No Sheen No Sheen No Sheen No Sheen No Sheen No Sheen No Sheen No Sheen No Sheen No Sheen No Sheen No Sheen No Sheen No Sheen Sheen, trace propetroleum hydrocarbon-like Sheen WELL-GRADED SAND with GRAVEL (SW): very dark gray (10YR 3/1), wet, medium dense, 80% fine to coarse sand, 15% fine subrounded gravel (up to 1" in size), 5% nonplastic fines. Sheen, trace propetroleum subrounded gravel (up to 1" in size), 5% nonplastic fines.	
SILTY SAND (SM): dark yellowish brown (10YR 3/4), moist, loose, 75% fine to coarse sand, 20% nonplastic fines, 5% fine subrounded gravel (up to 2" in size), wood debris, FILL. Wet @ 7 FT. Wet L-GRADED SAND with GRAVEL (SW): very dark gray (10YR 3/1), wet, medium dense, 80% fine to coarse sand, 15% fine subrounded gravel (up to 1" in size), 5% nonplastic fines. No Sheen No Sheen Sheen, trace propertoleum hydrocarbon-like subrounded gravel (up to 1" in size), 5% nonplastic fines.	
gravel (up to 2" in size), wood debris, FILL. Wet @ 7 FT. Sheen, trace propetroleum hydrocarbon-like Sheen WELL-GRADED SAND with GRAVEL (SW): very dark gray (10YR 3/1), wet, medium dense, 80% fine to coarse sand, 15% fine subrounded gravel (up to 1" in size), 5% nonplastic fines. Sheen. trace propetroleum hydrocarbon-like Sheen Sheen. Sheen.	
9 3/1), wet, medium dense, 80% fine to coarse sand, 15% fine subrounded gravel (up to 1" in size), 5% nonplastic fines.	
. \ 10	
medium dense, 95% fine to medium sand, 5% nonplastic fines.	
No recovery.	
14 10 13.8 WELL-GRADED SAND with GRAVEL (SW): very dark gray (10YR 3/1), wet, medium dense, 85% fine to coarse sand, 15% nonplastic fines, trace subrounded gravel (up to 0.75" in size).	
одкволе Одина (Стану и Стану	V (REV. 8/2011)

Log of Boring No. PE-SB06 (cont'd)

					0200 (00110 0.)
	Sample Blows/ Sample Foot	OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., plast. density, structure, cementation, react. w/HCl, geo. inter.		REMARKS
	11 14	1.8			No Sheen
16-	11 11		WELL-GRADED SAND with GRAVEL (SW): very dark gray (10YR 3/1), wet, medium dense, 85% fine to coarse sand, 15% nonplastic fines, trace subrounded gravel (up to 0.75" in size).	-	No Sheen
17 –	7	3.9 8.3	inics, trace subrounded graver (up to 0.70 in size).	-	No Sheen
18-	7 9	5	POORLY-GRADED SAND (SP): very dark gray (10YR 3/1), wet, loose, 95% fine to medium sand, 5% nonplastic fines, with trace PEAT (PT), hydrogen sulfide-like odor.	-	No Sheen
05 07 08 08 09 09 09 09 09 09	13 15 20			-	No Sheen
20 – 908 s – H – H 21 – H	20		Bottom of Boring @ 20.0 FT. Abandoned with bentonite to 2 FT bgs and cement to surface.	-	No Sheen
21-				_	
23-				_	
_ 24 <i>-</i>				_	
_ 25 –				_	
26-				_	
27 –				_	
28-				- -	
29-					
30-					
31-					
32-					
33					OAKBOREV (REV. 8/2011)
	ame	.	Project No.	61031400	

PROJE	ECT:	Ex:	xonN 17/2	Mobil/AD0 731 Fede	C Final Data Investigation eral Ave. Everett, WA	L	og of Bori	ng No. F	PE-SB07
BORIN	IG LO	CAT	ION:	Vigor Ma	rine (Port of Everett Leasehold Property)	ELEVAT NA	TON AND DATUM	Л :	
DRILLI	NG C	ГИО	RAC	TOR: Cas	cade Drilling, Inc.		TARTED:	DATE FII 2/7/14	
DRILLI	NG M	ETH	IOD:	Hollow	v-stem auger	TOTAL I	DEPTH (ft.):	Ground	
DRILLI	NG E	QUII	PME	NT: CME	75	DEPTH ⁻	TO WATER (ft.)	FIRST NA	COMPL. NA
SAMPI	LING I	MET	HOD	: Modified	California drive sampler [18" x 2.5"]	J. Bella	my, LG	OLONAL	DEC NO
HAMM				300	DROP: 30	John Lo	NSIBLE PROFES ong	SIONAL:	REG. NO. L.Hg. 1354
DEPTH (feet)	Sample No.	_	Blows/ SS Foot	OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., plast. d cementation, react. w/HCl, geo. in Surface Elevation: NA	ensity, struct ter.	ture,	ı	REMARKS
					Asphalt.				
1- 2- - 3-	-				POORLY-GRADED SAND (SP): very dark grayon specific street, so the second series of the second	5% fine sub		Cleared to vacuum to	o 5 feet bgs with ruck.
4- - 5-	PE-SB07-5-020314			100 71.6	WELL-GRADED SAND (SW): very dark gray 95% fine to coarse sand, 5% nonplastic fines. Wet @ 4.5 FT.		moist,		sible product,
6- - 7-	PE-SB07-7-020714 PI		4 5 9	60	WELL-GRADED SAND (SW): very dark gray loose, 95% fine to coarse sand, 5% nonplastic subrounded gravel (up to 0.75" in size).			Sheen, vi petroleum	oon-like odor. sible product, n oon-like odor. sible product,
8- - 9-	PE-SB07-9-020714 P		19 18 8 5 8	33 71 43	Similar as above but with trace wood debris.			hydrocart Sheen, vi petroleum hydrocart Sheen, vi petroleum	oon-like odor. sible product, n oon-like odor. sible product,
10 - - 11 -	PE-SB07-11-020714		18 18 18	4.0				Sheen, vi	oon-like odor.
12- - 13-	PE-SB07-15-02050207-13-020714 F		16 15 18 15	4.0 11.4				No Sheer	
14-	7E-SB07-15-@2		18 21 14	12.2 4.5				_ No Sheer	n
15-	, ц	9		•			Design (A) 0465	4.4000	OAKBOREV (REV. 8/2011)
		â	me	C*			Project No. 6103	14009	Page 1 of 2

Log of Boring No. PE-SB07 (cont'd)

		451.						
DEPTH (feet)	Sample No.	Sample T	Blows/ C	OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., plast. density, structure, cementation, react. w/HCl, geo. inter.		F	REMARKS
		0	15					
-	4		19	9.9	SILTY SAND (SM): very dark gray (10YR 3/1), wet, medium dense 80% fine to medium sand, 20% nonplastic fines, trace fine subrounded gravel (up to 0.75" in size), trace PEAT.	e, _	No Sheen	
16 -	17-02071		13 20	14.5			No Sheen	
17 <i>-</i> -	PE-SB07-17-020714		15	12.2			No Sheen	
18-	ш.		10 10 12	8.4			Sheen	
19-	120714	\setminus	6			_	No Sheen	
20 –	PE-SB07-20-020714		8	4.8	PEAT (PT): reddish brown (2.5YR 2.5/3), wet, medium stiff, 100% organic, hydrogen sulfide-like odor.		No Sheen	
21 –	PE-S				Bottom of Boring @ 20.0 FT. Abandoned with bentonite to 2 FT bg and cement to surface.	s _	110 0110011	
_ 22_								
_						_		
23-								
24-						_		
25-								
26-						_		
_ 27 <i>-</i>								
-								
28 – –								
29 – –								
30-								
31-						_		
32-								
33								
				•				OAKBOREV (REV. 8/2011)
		а	med	- CO	Project 1	No. 610314	4009	Page 2 of 2

PROJECT					Final Data Investigation ral Ave. Everett, WA	L	og of Bori	ng No. PE-SB08
BORING I	LOC	CATI	ION:	Vigor Ma	rine (Port of Everett Leasehold Property)	ELEVAT NA	ION AND DATUM	Л:
DRILLING	G CC	TNC	RAC	TOR: Case	cade Drilling, Inc.	DATE ST 2/4/14	TARTED:	DATE FINISHED: 2/6/14
DRILLING	3 ME	ΞTΗ	OD:	Hollow	-stem auger	20.0	DEPTH (ft.):	MEASURING POINT: Ground Surface
DRILLING	G EC	QUIF	PMEN	NT: CME 7	5	DEPTH 1	O WATER (ft.)	FIRST COMPL. NA NA
SAMPLIN	IG N	1ETI	HOD	: Modified	California drive sampler [18" x 2.5"]	LOGGEI J. Bellai		1,0,1
HAMMER	R WI	EIGH	HT:	300	DROP: 30	RESPON John Lo	SIBLE PROFESS	SIONAL: REG. NO. L.Hg. 1354
_	SAN No.		Blows/ S Foot	OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., plast. d cementation, react. w/HCl, geo. ir Surface Elevation: NA		ure,	REMARKS
					Asphalt.			
1- 2- 3- 4-					WELL-GRADED SAND (SW): very dark gray 85% fine to coarse sand, 10% fines, 5% nonpl			Cleared to 5 feet bgs with vacuum truck.
5- 6- 7- 7- 7- 7- 7- 7- 7- 7- 7- 7- 7- 7- 7-	20014		6 6 7	0.8	SILTY SAND (SM): very dark gray (10YR 3/1 fine to coarse sand, 35% nonplastic fines, trac gravel (up to 0.75" in size), wood debris.			No Sheen No Sheen
	. I		3 5	0.0	SANDY SILT (ML): very dark gray (10YR 3/1) nonplastic fines, 35% fine to medium sand.	, wet, soft, 6	55%	No Sheen
8-8-40	PE-SB		8	0 0.0	POORLY-GRADED SAND (SP): very dark gr. loose, 95% fine to medium sand, 5% nonplast subrounded gravel (up to 0.75" in size).			No Sheen
9-			5 8	2.0			-	No Sheen
10 - 419020	720614		4 4 5				-	No Sheen
12 - 11 - 12 - 12 - 13 - 14 - 15 - 15 - 15 - 15 - 15 - 15 - 15	-SB08-11.5-C		5 5 5	2.2	WELL-GRADED SAND (SW): very dark gray loose, 85% fine to coarse sand, 10% nonplast subrounded gravel (up to 2" in size).			Sheen, petroleum hydrocarbon-like odor
13-	у Г	\geq	8	2.1 3.2			-	Sheen, petroleum hydrocarbon-like odor Sheen, petroleum
14 -			4 5 7	2.9 6.6			-	hydrocarbon-like odor Sheen, petroleum hydrocarbon-like odor
15		\						OAKBOREV (REV. 8/2011)
		a	me	20			Project No. 61031	14009 Page 1 of 2

Log of Boring No. PE-SB08 (cont'd)

- 27 -	-					_	
26-	-					_	
25 –	_					_	
24 –	PE-S				and cement to surface.	_	NO SHEET
23-	PE-SB08-23-020614		21 24 27	0	Bottom of Boring @ 23.0 FT. Abandoned with bentonite to 2 FT bgs		No Sheen
22 –	0614 PE-S		7	0	medium dense, 95% fine to medium sand, 5% nonplastic fines, trace subrounded gravel (up to 0.75" in size) mixed with trace PEAT (PT), hydrogen sulfide odor.	_	hydrocarbon-like odor
21 –	PE-SB08-21-020614		6 7	7.9	loose, 95% fine to medium sand, 5% nonplastic fines, trace subrounded gravel (up to 0.75" in size). POORLY-GRADED SAND (SP): very dark gray (10YR 3/1), wet,	_	Sheen, petroleum
20 –	20614	\triangle	4		POORLY-GRADED SAND (SP): very dark gray (10YR 3/1), wet,		hydrocarbon-like odor
19-	-		18 5 5	16.6	medium dense, 90% fine to coarse sand, 5% nonplastic fines, 5% fine subrounded gravel.	_	hydrocarbon-like odor Sheen, petroleum
18-	-		16 18	11.3	POORLY-GRADED SAND (SP): very dark gray (10YR 3/1), wet,		hydrocarbon-like odor Sheen, petroleum
- 17 <i>-</i>	_		14 15 18	30.8	rounded to subrounded gravel (up to 3" in size), 5% nonplastic fines, glass fragments.	_	hydrocarbon-like odor Sheen, petroleum
- 16-	-		9	21.2	WELL-GRADED SAND with GRAVEL (SW): very dark gray (10YR 3/1), wet, medium dense, 65% fine to coarse sand, 30% fine		Sheen, petroleum hydrocarbon-like odor Sheen, petroleum
DEPTH (feet)	Sample No.	Sample	Blows/ Foot	OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., plast. density, structure, cementation, react. w/HCl, geo. inter.		

PROJE					Final Data Investigation ral Ave. Everett, WA	Log of E	Borin	ıg No. P	E-SB09
BORIN				Port of Ev		ELEVATION AND D	ATUM:		
					ade Drilling, Inc.	DATE STARTED: 2/4/14 TOTAL DEPTH (ft.):		DATE FIN 2/10/14 MEASUR	IISHED:
DRILLI	NG M	ETH	HOD:	Hollow-	stem auger	20.0		Ground S	Surface
DRILLI	NG E	QUII	PMEN	NT: CME 7	5	DEPTH TO WATER	(ft.)	FIRST NA	COMPL. NA
SAMPI	_ING I	MET	HOD	Modified	California drive sampler [18" x 2.5"]	J. Bellamy, LG RESPONSIBLE PRO)EE00	IONAL :	REG. NO.
HAMM	ER W			300	DROP: 30	John Long	JI L33	IONAL.	L.Hg. 1354
DEPTH (feet)	Sample Sample No.	Sample 14	Blows/ S Foot	OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., plast. do cementation, react. w/HCl, geo. in	ensity, structure, ter.		R	EMARKS
<u> </u>	Sa	Sa	留出	8	Surface Elevation: NA				
_					Asphalt.				
1- - 2-					WELL-GRADED SAND (SW): dark yellowish moist, loose, 85% fine to coarse sand, 10% no fine subrounded gravel (up to 0.75" in size). Fl	nplastic fines, 5%	- - -	Cleared to vacuum tri	5 feet bgs with uck.
3- 4- 5-	PE-SB09-5.5-021014			1.0	Wet @ 5 FT.		- - -	Sheen	
6- - 7-	PE-SB0	\ 	6 7 18	0.2 0.0			_	Sheen	
8-			5 10 9	0.5	POORLY-GRADED SAND (SP): very dark graloose, 95% fine to medium sand, 5% nonplasti subrounded gravel (up to 0.75" in size).		_	No Sheen	
9-			2	0.3	PEAT (PT): reddish brown (2.5YR 2.5/3), wet, matter, hydrogen sulfide-like odor.	soft, 100% organic	_	Trace She	en
_			3	0.0	PEAT (PT): reddish brown (2.5YR 2.5/3), wet, POORLY GRADED SAND (SP).	soft, mixed with	_	No Sheen	
10 – –		$ \setminus$	6 5				-	No Sheen	
11 <i>-</i> -			6	0.0 0.1	DOODLY CDADED CAND (CD), year deek green	w (40VD 2/4) wet		No Sheen	
12-			6 6 8	0.2	POORLY-GRADED SAND (SP): very dark gra loose, 95% fine to medium sand, 5% nonplasti (PT)		_	No Sheen	
13 <i>-</i>		$\left \cdot \right $	9				-	No Sheen	
14 – –			10	0.2 0.9			_	No Sheen	
15-			V -						OAKBOREV (REV. 8/2011)
		а	me	-o		Project No.	610314	1009	Page 1 of 2

Log of Boring No. PE-SB09 (cont'd)

	SAI	MPL	ES	(D				
DEPTH (feet)	Sample No.		Blows/ Foot	OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., plast. density, structure, cementation, react. w/HCl, geo. inter.		F	REMARKS
16-			10	2.0	POORLY-GRADED SAND (SP): very dark gray (10YR 3/1), wet, loose, 95% fine to medium sand, 5% nonplastic fines, mixed with		No Sheen	
- 17 -			5 5 4	8.6 0.6	PEAT (PT), hydrogen sulfide-like odor.	_	No Sheen	
18 <i>-</i>			9 14 15	2.6		_	No Sheen	
19 – 20 –	PE-SB09-5.5-021014		8 8 9	7.0	PEAT (PT): reddish brown (2.5YR 2.5/3), wet, medium stiff, 100% organic, hydrogen sulfide-like odor.		No Sheen	
21 –	PE-SBC				Bottom of Boring @ 20.0 FT. Abandoned with bentonite to 2 FT bg and cement to surface.	s	No Sheen	
22 – –						_		
23 – –						_		
24 – – 25 –						_		
26-						_		
27 –						_		
28 – – 29 –						_		
30-						_		
31 -						_		
32 – –						_		
33-		1						OAKBOREV (REV. 8/2011)
		а	me	co Co	Project I	No. 610314	1009	Page 2 of 2

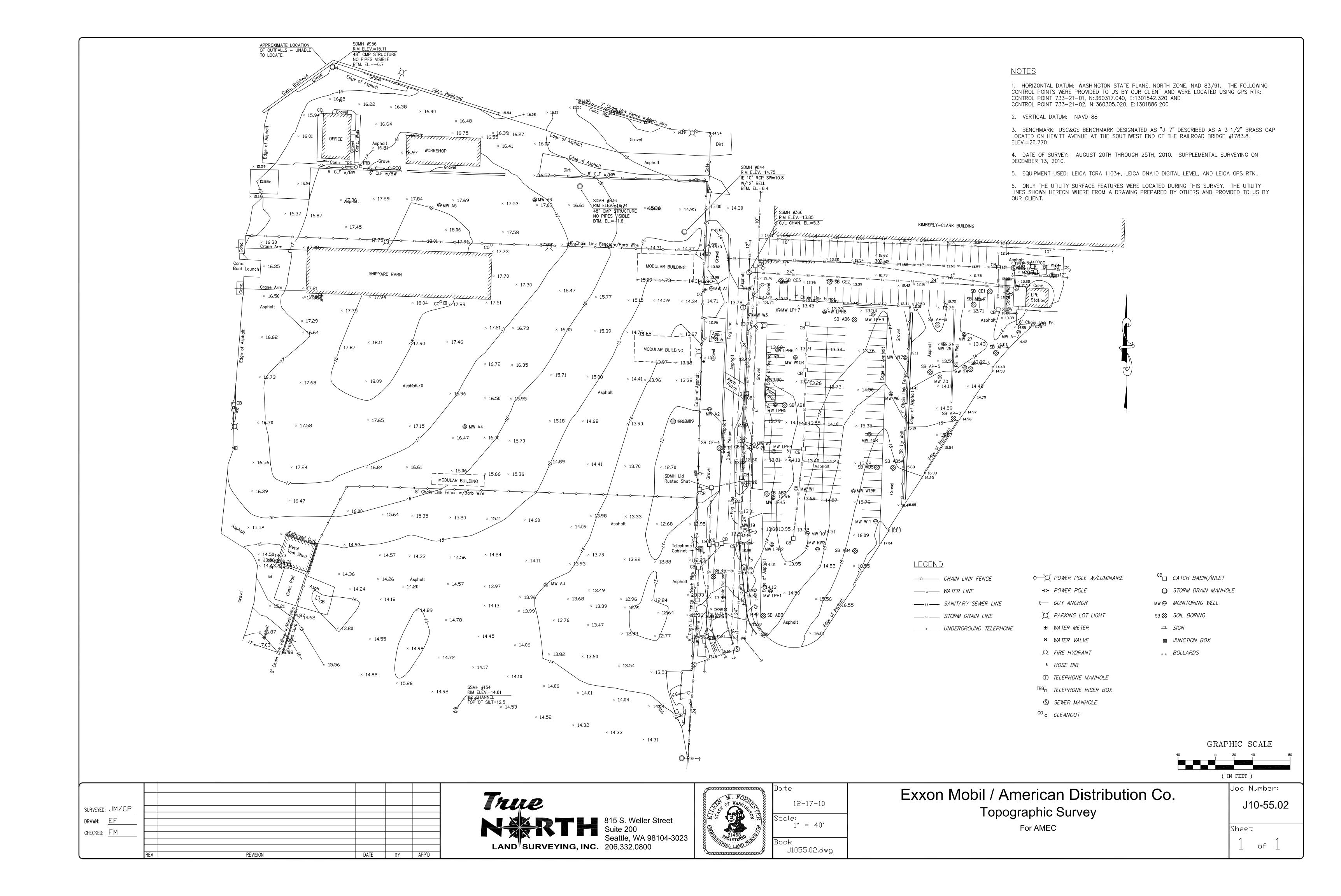
PROJE					C Final Data Investigation eral Ave. Everett, WA	Log of Bo	Log of Boring No. PE-SB10			
BORING LOCATION: Vigor Marine (Port of Everett Leasehold Property) ELEVATION AND DATU NA DATE STARTED:										
DRILLI	NG C	ОИТ	2/6/1	DATE FINISHED: 2/6/14						
DRILLI	NG M	ETH	Grou	SURING POINT: nd Surface						
DRILLI	NG E	QUII	.) FIRST	COMPL. NA						
SAMPI	LING I	МЕТ								
HAMM			ESSIONAL:	REG. NO. L.Hg. 1354						
DEPTH (feet)	Sample No.	_	MPLES DESCRIPTION					REMARKS		
					Asphalt (6")					
1- 2- 3- 4-					WELL-GRADED SAND (SW): very dark gr 80% fine to coarse sand, 15% nonplastic fir gravel, Fill.			ed to 5 feet bgs with m truck.		
5 - 6 - 7 -			10 22 16	1.5 0.2	WELL-GRADED SAND (SW): very dark gr medium dense, 80% fine to coarse sand, 19 fine subrounded gravel, Fill.		- No Sh - No Sh - No Sh	een		
8-	3.5-021014		21 21 20	0.0	Wet @ 8.5 FT.		_ _ _ No Sh			
9-	PE-SB10-8.5-021014	\	16 15 16	0.0			No Sh	een		
11-			9 7 7	0.0 0.0			No Sh			
12- - 13-			8 7 5	5.8			No Sh			
14-			5 5 4 7	0.4 0.1	SANDY SILT (ML): very dark gray (10YR 3 83% nonplastic fines, 17% fine to coarse sa subrounded gravel (up to 0.75" in size), trac sulfide-like odor.	and, trace fine	No Sh			
15-	1		V	•		I		OAKBOREV (REV. 8/2011)		
		â	me	CO		Project No. 6	10314009	Page 1 of 2		

Log of Boring No. PE-SB10 (cont'd)

SAI	MPLE	= S					
(feet) Sample No.		Blows/ C	OVM READING (ppm)	DESCRIPTION NAME (USCS): color, moist, % by wt., plast. density, structure, cementation, react. w/HCl, geo. inter.		F	REMARKS
- 16 - - 17 -		6 7 5 4 5	0.2 0.0 0.0	WELL-GRADED SAND (SW): very dark gray (10YR 3/1), wet, loose, 90% fine to coarse sand, 5% nonplastic fines, 5% fine subrounded gravel (up to 0.75" in size), mixed with trace PEAT (PT). SANDY SILT (ML): very dark gray (10YR 3/1), wet, medium stiff, 83% nonplastic fines, 17% fine to coarse sand, trace fine subrounded gravel (up to 0.75" in size), trace PEAT (PT), wood debris, hydrogen sulfide-like odor.	-	No Sheen No Sheen No Sheen	
18-		8 10 10	0.0	WELL-GRADED SAND (SW): very dark gray (10YR 3/1), wet, loose, 90% fine to coarse sand, 5% nonplastic fines, 5% fine subrounded gravel (up to 1" in size).		No Sheen	
19 - 05 - 05 - 05 - 05 - 05 - 05 - 05 - 0		12 15 20	0.0	SILT (ML): very dark gray (10YR 3/1), wet, stiff, 90% nonplastic fines, 10% fine to medium sand, wood debris. WELL-GRADED SAND (SW): very dark gray (10YR 3/1), wet, medium dense, 90% fine to coarse sand, 5% nonplastic fines, 5%		No Sheen No Sheen	
21 – –				fine subrounded gravel (up to 1" in size). Bottom of Boring @ 20.0 FT. Abandoned with bentonite to 2 FT bgs and cement to surface.	_/ - s - -	- - -	
22-					-	_	
23-					-	_	
24 – – 25 –					-	_	
26-					-	_	
27-					- - -	_ _ _	
28-					-	_	
29 – – 30 –					- -	_ _ _	
31 –					- -	_	
32-					-	_	
33							OAKBOREV (REV. 8/2011)
	a	me	-o	Project N	lo. 61031	14009	Page 2 of 2

APPENDIX C

TOPOGRAPHIC SURVEY BY TRUENORTH

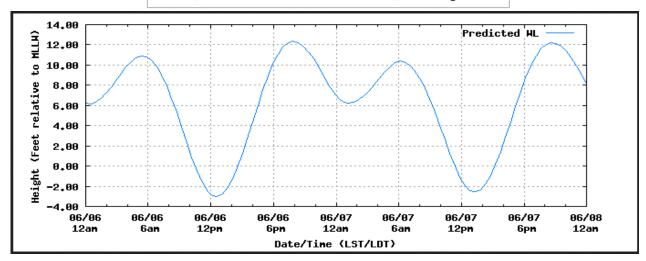


APPENDIX D TIDAL FLUX CALCULATIONS

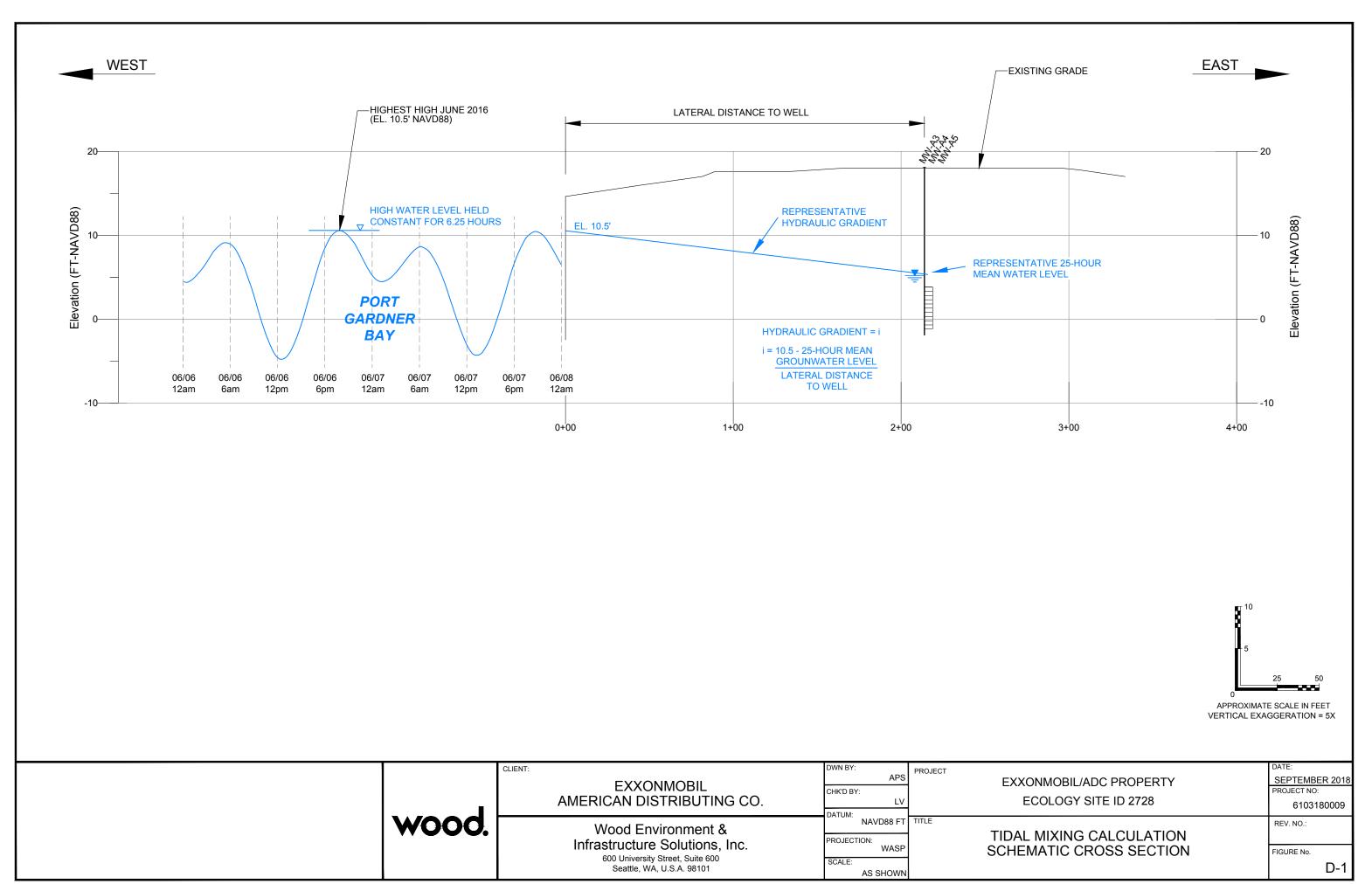
Calculated Maximum Tide Flux Travel Distance

ExxonMobil/ADC Property Ecology Site ID 2728 Everett, Washington

June 6, 2016 Tide Predictions at Everett, Washington



MW-A5 hydrau	lic conductivity						
mitt 710 Hydrad	ilo conductivity			Distance			
	Mean Water			from Port			
	Level 25 hour			Gardner Bay			K
Well	(NGVD88)	units	Datum	(feet)	K (cm/sec)	K based on	(inch/hour)
MW-A3	6.413	feet	NGVD88	368	6.35E-03		9.0
MW-A4	4.747	feet	NGVD88	234	6.35E-03	MW-A5	9.0
MW-A5	5.605	feet	NGVD88	230	6.35E-03		9.0
				Effective		% of voids for	
Everett Tide	12.3	feet	MLLW	Porosity	0.3	sand	
(June 6,2016)	10.5	feet	NGVD88				
0	Seepage veolocity	$S_v =$	Ki/n _e				
					6.25 hour travel		
	K	i	n _e	S _v (inch/hour)	distance (feet)		
	9.0	0.011	0.3	0.33	0.17		
	9.0	0.025	0.3	0.74	0.38		
	9.0	0.021	0.3	0.64	0.33		
MW-A6 hydrau	lic conductivity						
				Distance			
	Mean Water			from Port			
	Level 25 hour			Gardner Bay			K
Well	(NGVD88)	units	Datum	(feet)	K (cm/sec)	K based on	(inch/hour)
MW-A3	6.413	feet	NGVD88	368	9.28E-03		13.2
MW-A4	4.747	feet	NGVD88	234	9.28E-03	MW-A6	13.2
MW-A5	5.605	feet	NGVD88	230	9.28E-03		13.2
				Effective		% of voids for	
Everett Tide	12.3	feet	MLLW	Porosity	0.3	sand	
(June 6,2016)	10.5	feet	NGVD88				
S	Seepage veolocity	$S_v =$	Ki/n _e				
					6.25 hour travel		
	K	i	n _e	S _v (inch/hour)	distance (feet)		
	13.2	0.011	0.3	0.49	0.25		
	13.2	0.025	0.3	1.08	0.56		
	13.2	0.021	0.3	0.93	0.49		



APPENDIX E

HISTORICAL SITE CHARACTERIZATI ON DATA



Memo

To: Leah Vigoren Project: 6103140009 From: Crystal Neirby cc: Project File

Danille Jorgenson

Tel: (206) 342-1760 Fax: (206) 342-1761 Date: April 15, 2015

Subject: ExxonMobil/ADC Site – January 2015 Semiannual Groundwater Sampling
Data Quality Review – Work Order Numbers: 15-01-0127, 15-01-0234, 15-01-0235, 15-

01-0330, and 15-01-0445

This memorandum presents a summary data quality review for analyses of 31 primary groundwater samples, three groundwater field duplicate samples, and four trip blanks collected between January 5 and 8, 2015. The samples were submitted to Eurofins Calscience, located in Garden Grove, California, a laboratory certified by the Washington State Department of Ecology (Ecology).

The samples were analyzed for the following analytes:

- Selected volatile organic compounds (VOCs) (benzene, toluene, ethylbenzene, total xylenes, and methyl tert-butyl ether) by U.S. Environmental Protection Agency (EPA) Method 8260B;
- Polycyclic aromatic hydrocarbons (PAHs) by EPA Method 8270C with select ion monitoring (SIM);
- Total petroleum hydrocarbons (TPH) as gasoline (TPH-G) by Ecology Method NWTPH-Gx;
 and
- TPH as diesel (TPH-D) and motor oil (TPH-MO) by Ecology Method NWTPH-Dx with silica gel cleanup.

The sample IDs, sample collection dates, laboratory sample IDs, and analyses conducted on the samples are listed in the table below.

Sample Location	Sample ID	Sample Collection Date	Laboratory Sample ID	Requested Analyses
MW-A8	XOM010515-03	1/5/2015	15-01-0127-1	all
MW-A5	XOM010515-01	1/5/2015	15-01-0127-2	all
MW-A6	XOM010515-02	1/5/2015	15-01-0127-3	all
MW-A7	XOM010515-04	1/5/2015	15-01-0127-4	all
MW-A2	XOM010515-06	1/5/2015	15-01-0127-5	all
MW-A2	XOM010515-100	1/5/2015	15-01-0127-6	all
Field Duplicate				
MW-19	XOM010515-07	1/5/2015	15-01-0127-7	all
Trip Blank		1/5/2015	15-01-0127-8	VOCs
MW-A3	XOM010615-05	1/6/2015	15-01-0234-1	all



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Sample Location	Sample ID	Sample	Laboratory	Requested
		Collection Date	Sample ID	Analyses
MW-A4	XOM010615-09	1/6/2015	15-01-0234-2	all
MW-A1	XOM010615-10	1/6/2015	15-01-0234-3	all
MW-40R	XOM010615-08	1/6/2015	15-01-0234-4	all
MW-11	XOM010615-11	1/6/2015	15-01-0234-5	all
Trip Blank		1/6/2015	15-01-0234-6	VOCs
LPH-1	XOM010615-12	1/6/2015	15-01-0235-1	all
LPH-2	XOM010615-13	1/6/2015	15-01-0235-2	all
RW-2	XOM010615-14	1/6/2015	15-01-0235-3	all
MW-10	XOM010615-15	1/6/2015	15-01-0235-4	all
LPH-3	XOM010715-16	1/7/2015	15-01-0330-1	all
W-1	XOM010715-17	1/7/2015	15-01-0330-2	all
W-2	XOM010715-18	1/7/2015	15-01-0330-3	all
LPH-4	XOM010715-19	1/7/2015	15-01-0330-4	all
LPH-5	XOM010715-20	1/7/2015	15-01-0330-5	all
LPH-6	XOM010715-21	1/7/2015	15-01-0330-6	all
W-10R	XOM010715-22	1/7/2015	15-01-0330-7	all
W-3	XOM010715-23	1/7/2015	15-01-0330-8	all
W-2	XOM010715-101	1/7/2015	15-01-0330-9	all
Field Duplicate				
Trip Blank		1/7/2015	15-01-0330-10	VOCs
LPH-7	XOM010815-24	1/8/2015	15-01-0445-1	all
Sump 1	XOM010815-25	1/8/2015	15-01-0445-2	all
Sump 2	XOM010815-26	1/8/2015	15-01-0445-3	all
LPH-8	XOM010815-27	1/8/2015	15-01-0445-4	all
LPH-9	XOM010815-28	1/8/2015	15-01-0445-5	all
W-17	XOM010815-29	1/8/2015	15-01-0445-6	all
W-6	XOM010815-30	1/8/2015	15-01-0445-7	all
W-15R	XOM010815-31	1/8/2015	15-01-0445-8	all
W-15R	XOM010815-102	1/8/2015	15-01-0445-9	all
Field Duplicate				
Trip Blank		1/8/2015	15-01-0445-10	VOCs

The analytical results for these samples were reviewed in accordance with the requirements specified in EPA National Functional Guidelines (EPA, 2008), the analytical methods referenced by the laboratory, Amec Foster Wheeler data review procedures, and the laboratory quality control limits. The EPA guidelines referenced above were written specifically for the Contract Laboratory Program, and have

Memo April 15, 2015 Page 3 of 7



been modified for the purposes of this data quality review where they differ from EPA SW-846 method requirements.

All of the certified laboratory reports were reviewed to assess the following: chain-of-custody compliance; holding time compliance; presence or absence of laboratory contamination as demonstrated by method and trip blanks; laboratory control samples (LCS) and LCS duplicates (LCSD); matrix spike (MS) samples; analytical precision as the relative percent (%) difference between replicate sample results (i.e., laboratory and field duplicates) or MS and MS duplicates (MSD); instrument tunes; instrument blanks; interference check samples; and initial and continuing calibrations. This level of data review is equivalent to an EPA Level 2B data review. The work orders subject to the Level 2B data review are 15-01-0127, 15-01-0235, 15-01-0330, and 15-01-0445.

In addition, 10 percent of the results were subjected to an EPA Level 3 data review. The Level 3 data review involves review of all of the criteria noted above for the Level 2B data review and also includes recalculation of instrument and sample results from the laboratory responses, and comparison of the recalculated results to the results reported by the laboratory. The work order subject to the Level 3 data review is 15-01-0234.

Upon receipt by the laboratory, information from the sample jars was compared to the chain-of-custody forms. The temperatures of the coolers were recorded as part of the check-in procedure, and were less than the maximum acceptable temperature of 6 degrees Celsius (°C).

Samples were analyzed using the methods identified in the introduction to this report, and the results were evaluated for the following criteria.

- 1. GC/MS Instrument Performance Check (VOCs and PAHs) Acceptable
- Holding Times Acceptable.
- 3. Blanks Acceptable.

A trip blank was not submitted with samples included in work order 15-01-0235. These samples were collected on the same day as samples submitted with work order 15-01-0127 and all of the samples analyzed for VOCs were submitted in the same cooler; therefore, the trip blank submitted with work order 15-01-0127 can be used to evaluate samples in work order 15-01-0235. Sample results are not affected and are not qualified.

- 4. **LCS/LCSD** Acceptable.
- 5. **MS/MSD** Acceptable.
- 6. **Laboratory Duplicates** Acceptable.
- 7. **Field Duplicates** Acceptable.

Three field duplicates were collected and the primary and duplicate sample IDs are identified in the table below. The primary and duplicate results, as well as the calculated relative percent differences (RPDs), are summarized in the table below. An RPD is not calculated if both the primary and duplicate results are not greater than five times the value of the reporting limit, as indicated in the table below by "NC." In these cases, the difference between the primary and duplicate results should not exceed the value of the reporting limit. The field duplicate RPDs are acceptable (i.e., the RPD is less than 30 or the primary and duplicate results do not differ by more than the value of the RL) except for the TPH-G results for

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XOM010715-18 and XOM010715-101. The TPH-G results in these two samples are qualified as estimated and flagged with a "J."

		Primary	Duplicate	Reporting	
Sample ID/		Result	Result	Limit	RPD
Field Duplicate ID	Analyte	(µg/L)	(µg/L)	(µg/L)	(%)
XOM010515-06/	TPH-D	320	320	100	0
XOM010515-100	TPH-G	110	110	100	0
	1-methylnaphthalene	0.22	0.18	0.096	NC
	acenaphthene	0.68	0.71	0.096	4
	fluorene	1.1	1.0	0.096	10
XOM010715-18/	TPH-D	1,300	970	100	29
XOM010715-101	TPH-G	490	1,000	100	68
	acenaphthene	2.6	2.3	0.096	12
	fluorene	2.8	2.2	0.096	24
	phenanthrene	2.6	2.5	0.096	4
	anthracene	0.14	0.14	0.096	NC
	pyrene	0.10	ND	0.096	NC
	2-methylnaphthalene	12	11	0.096	9
	1-methylnaphthalene	25	23	0.096	8
XOM010815-31/	TPH-D	3,000	3,000	100	0
XOM010815-102	TPH-G	2,500	2,900	100	15
	acenaphthylene	0.36	0.53	0.095	NC
	acenaphthene	3.3	4.1	0.095	22
	fluorene	4.1	4.0	0.095	2
	phenanthrene	3.2	3.6	0.095	12
	anthracene	0.28	0.26	0.095	NC
	fluoranthene	0.26	0.19	0.095	NC
	pyrene	0.20	0.13	0.095	NC
	2-methylnaphthalene	120	120	0.095	0
Natar	1-methylnaphthalene	92	93	0.095	1

Notes

μg/L = micrograms per liter RPD= relative percent difference

8. **Surrogates** – Acceptable except as noted:

NWTPH-Gx

The surrogate was recovered at 139 percent, greater than the control limits of 38 to 134 percent, in sample XOM010815-102. The high recovery equates to a possible high bias in the samples; therefore, the TPH-G result for sample XOM010815-102 is qualified as estimated and flagged with a "J."

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PAHs by EPA 8270C SIM

One of three surrogates, nitrobenzene-d5, was not recovered in the 50X dilutions performed on samples XOM010815-31 and XOM010815-102. The dilutions were performed to overcome high analyte concentrations. The samples are not qualified because the surrogates were not recovered due to the necessary dilutions.

- 9. Internal Standards Acceptable.
- 10. Reporting Limits and Laboratory Flags Acceptable.

Work Order 15-01-0127

<u>NWTPH-Dx:</u> The laboratory flagged the TPH-D results in samples XOM010515-01, XOM010515-06, XOM010515-100, and XOM010515-07 with an "HD" to indicate the chromatographic profiles of these samples were inconsistent with the pattern of the reference fuel standard. The chromatograms were not reviewed as part of the Level 2B review; therefore the results are reported and are not qualified.

Work Order 15-01-0234

<u>NWTPH-Dx</u>

The laboratory flagged the TPH-D results from samples XOM010615-05, XOM010615-08, and XOM010615-10 with HD because the chromatogram did not resemble that of the reference standard. These results were subjected to a level 3 data review, and results were calculated using the reference standard. Amec Foster Wheeler agrees that the results should be considered estimated and the identification is tentative. Results for these samples are qualified as estimated and tentatively identified because of the poor spectral match, and the results are flagged NJ.

NWTPH-Gx

The laboratory flagged the TPH-G result from sample XOM010615-08 with HD because the chromatogram did not resemble that of the reference standard. These results were subjected to a level 3 data review, and results were calculated using the reference standard. Amec Foster Wheeler agrees that the results are estimated and the identification is tentative. This result is qualified as estimated and tentatively identified because of the poor spectral match, and the result is flagged NJ.

Work Order 15-01-0235

<u>NWTPH-Dx:</u> The laboratory flagged the TPH-D results in samples XOM010615-13, XOM010615-14, and XOM010615-15 with "HD" to indicate the chromatographic profiles of these samples were inconsistent with the pattern of the reference fuel standard. The chromatograms were not reviewed as part of the Level 2B review; the results are reported and are not qualified.

Work Order 15-01-0330

<u>NWTPH-Dx:</u> The laboratory flagged the TPH-D results in samples XOM010715-16, XOM010715-17, XOM010715-18, XOM010715-19, XOM010715-20, XOM010715-21, XOM010715-22, XOM010715-23, and XOM010715-101 and the TPH-MO results in samples XOM010715-17, XOM010715-19, XOM010715-20, and XOM010715-22 with "HD" to indicate the chromatographic profiles of these samples were inconsistent with the pattern of the

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reference fuel standard. The chromatograms were not reviewed as part of the Level 2B review; the results are reported and are not qualified.

<u>NWTPH-Gx:</u> The laboratory flagged the TPH-G results in samples XOM010715-17, XOM010715-18, XOM010715-22, and XOM010715-101 with "HD" to indicate the chromatographic profiles of these samples was inconsistent with the pattern of the reference fuel standard. The chromatograms were not reviewed as part of the Level 2B review; the results are reported and are not qualified.

Work Order 15-01-0445

<u>NWTPH-Dx:</u> The laboratory flagged the TPH-D results in samples XOM010815-24, XOM010815-26, XOM010815-27, XOM010815-28, XOM010815-29, XOM010815-30, XOM010815-31, and XOM010815-102, and the motor oil results in samples XOM010815-26, XOM010815-27, XOM010815-28, and XOM010815-29 with "HD" to indicate the chromatographic profiles of these samples was inconsistent with the pattern of the reference fuel standard. The chromatograms were not reviewed as part of the Level 2B review; the results are reported and are not qualified.

<u>NWTPH-Gx:</u> The laboratory flagged the TPH-G results in samples XOM010815-26, XOM010815-27, XOM010815-28, XOM010815-29, XOM010815-30, XOM010815-31, and XOM010815-102 with "HD" to indicate the chromatographic profiles of these samples was inconsistent with the pattern of the reference fuel standard. The chromatograms were not reviewed as part of the Level 2B review; the results are reported and are not qualified.

- 11. Initial Calibrations Acceptable.
- 12. **Continuing Calibrations** Acceptable.
- 13. Calculation Check Acceptable.

OVERALL ASSESSMENT OF DATA

The Eurofins Calscience work orders 15-01-0127, 15-01-0234, 15-01-0235, 15-01-0330, and 15-01-0445 are complete and usable. Evaluation of the data usability is based on EPA's guidance documents. Few problems were identified, and analytical performance was generally within specified limits. There were no rejected results, and all data are acceptable and meet the project's data quality objectives.

A summary of qualified results is presented in the table below.

Sample Identifications and Qualified Results

Sample ID	Qualified Analyte	Qualified Results	Qualifier Reason
XOM010515-03	none		
XOM010515-01	none		
XOM010515-02	none		
XOM010515-04	none		
XOM010515-06	none		
XOM010515-100	none		



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Sample ID	Qualified Analyte	Qualified Results	Qualifier Reason
XOM010515-07	none		
XOM010615-05	TPH as Diesel	110 NJ	Poor Spectral Match
XOM010615-09	none		
XOM010615-10	TPH as Diesel	730 NJ	Poor Spectral match
XOM010615-08	TPH as Diesel TPH as Gasoline	790 NJ 610 NJ	Poor Spectral Match
XOM010615-11	none		
XOM010615-12	none		
XOM010615-13	none		
XOM010615-14	none		
XOM010615-15	none		
XOM010715-16	none		
XOM010715-17	none		
XOM010715-18	TPH-G	490 J	field duplicate RPD
XOM010715-19	none		
XOM010715-20	none		
XOM010715-21	none		
XOM010715-22	none		
XOM010715-23	none		
XOM010715-101	TPH-G	1,000 J	field duplicate RPD
XOM010815-24	none		
XOM010815-25	none		
XOM010815-26	none		
XOM010815-27	none		
XOM010815-28	none		
XOM010815-29	none		
XOM010815-30	none		
XOM010815-31	none		
XOM010815-102	TPH-G	2,900 J	surrogate recovery

REFERENCES

U.S. Environmental Protection Agency (EPA), 2008, U.S. EPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review: EPA 540-R-08-001, June.

TABLE E-1: GROUNDWATER SAMPLE ANALYTICAL RESULTS 1,2

ExxonMobil/ADC Property, Ecology Site ID 2728 Everett, Washington

Well ID	LPH-1	LPH-2	LPH-3	LPH-4	LPH-5	LPH-6	LPH-7	LPH-8	LPH-9	MW-10	MW-11	MW-19	MW-40R	MW-A1	M	IW-A2	MW-A3	MW-A4
Date Sampled	01/06/2015	01/06/2015	01/07/2015	01/07/2015	01/07/2015	01/07/2015	01/08/2015	01/08/2015	01/08/2015	01/06/2015	01/06/2015	01/05/2015	01/06/2015	01/06/2015	01/05/2015	01/05/2015 FD	01/06/2015	01/06/2015
TPH (μg/L)																		
TPH as Gasoline	100 U	100 U	100	100 U	100 U	100 U	100 U	140	390	290	100 U	130 NJ	610	100 U	110	110	100 U	100 U
TPH as Diesel	100 U	130	200	8,600	450	240	140	140	970	690	100 U	180 NJ	790	730 NJ	320	320	110 NJ	100 U
TPH as Motor Oil Range	100 U	100 U	100 U	4100	230	100 U	100 U	130	180	100 U	100 U	100 U	100 U	100 U	100 U	100 U	100 U	100 U
PAHs (μg/L)																		
1-Methylnaphthalene	0.28	0.095 U	0.45	0.10	1.3	0.32	0.097 U	0.095 U	4.3	3.2	0.095 U	0.096 U	11	1.2	0.22	0.18	0.096 U	1.1
2-Methylnaphthalene	0.096 U	0.095 U	0.095 U	0.095 U	0.15	0.095 U	0.097 U	0.095 U	0.095 U	0.15	0.095 U	0.096 U	0.53	0.68	0.096 U	0.096 U	0.096 U	1.6
Acenaphthene	0.096 U	1.2	0.94	0.65	0.64	0.56	0.15	0.24	0.85	0.83	0.095 U	0.096 U	0.91	0.66	0.68	0.71	0.62	4.4
Acenaphthylene	0.096 U	0.095 U	0.095 U	0.027	0.096 U	0.095 U	0.097 U	0.095 U	0.095 U	0.096 U	0.095 U	0.096 U	0.096 U	0.096 U	0.096 U	0.096 U	0.096 U	0.096 U
Anthracene	0.096 U	0.095 U	0.095 U	0.095 U	0.096 U	0.095 U	0.097 U	0.095 U	0.095 U	0.096 U	0.095 U	0.096 U	0.096 U	0.096 U	0.096 U	0.096 U	0.096 U	0.13
Benzo (a) anthracene	0.096 U	0.095 U	0.095 U	0.095 U	0.096 U	0.095 U	0.097 U	0.095 U	0.095 U	0.096 U	0.095 U	0.096 U	0.096 U	0.096 U	0.096 U	0.096 U	0.096 U	0.096 U
Benzo (a) pyrene	0.096 U	0.095 U	0.095 U	0.095 U	0.096 U	0.095 U	0.097 U	0.095 U	0.095 U	0.096 U	0.095 U	0.096 U	0.096 U	0.096 U	0.096 U	0.096 U	0.096 U	0.096 U
Benzo (b) fluoranthene	0.096 U	0.095 U	0.095 U	0.095 U	0.096 U	0.095 U	0.097 U	0.095 U	0.095 U	0.096 U	0.095 U	0.096 U	0.096 U	0.096 U	0.096 U	0.096 U	0.096 U	0.096 U
Benzo (g,h,i) perylene	0.096 U	0.095 U	0.095 U	0.095 U	0.096 U	0.095 U	0.097 U	0.095 U	0.095 U	0.096 U	0.095 U	0.096 U	0.096 U	0.096 U	0.096 U	0.096 U	0.096 U	0.096 U
Benzo (k) fluoranthene	0.096 U	0.095 U	0.095 U	0.095 U	0.096 U	0.095 U	0.097 U	0.095 U	0.095 U	0.096 U	0.095 U	0.096 U	0.096 U	0.096 U	0.096 U	0.096 U	0.096 U	0.096 U
Chrysene	0.096 U	0.095 U	0.095 U	0.095 U	0.096 U	0.095 U	0.097 U	0.095 U	0.095 U	0.096 U	0.095 U	0.096 U	0.096 U	0.096 U	0.096 U	0.096 U	0.096 U	0.096 U
Dibenz (a,h) anthracene	0.096 U	0.095 U	0.095 U	0.095 U	0.096 U	0.095 U	0.097 U	0.095 U	0.095 U	0.096 U	0.095 U	0.096 U	0.096 U	0.096 U	0.096 U	0.096 U	0.096 U	0.096 U
Fluoranthene	0.096 U	0.095 U	0.095 U	0.095 U	0.096 U	0.095 U	0.097 U	0.095 U	0.095 U	0.096 U	0.095 U	0.096 U	0.096 U	0.096 U	0.096 U	0.096 U	0.096 U	0.15
Fluorene	0.096 U	0.19	0.41	0.36	0.43	0.52	0.12	0.21	0.84	0.28	0.095 U	0.096 U	0.77	0.63	1.1	1.0	0.23	1.9
Indeno (1,2,3-c,d) pyrene	0.096 U	0.095 U	0.095 U	0.095 U	0.096 U	0.095 U	0.097 U	0.095 U	0.095 U	0.096 U	0.095 U	0.096 U	0.096 U	0.096 U	0.096 U	0.096 U	0.096 U	0.096 U
Naphthalene	0.096 U	0.095 U	0.095 U	0.095 U	0.096 U	0.095 U	0.097 U	0.095 U	0.095 U	0.096 U	0.095 U	0.096 U	0.096 U	0.096 U	0.096 U	0.096 U	0.096 U	7.9
Phenanthrene	0.096 U	0.095 U	0.13	0.095 U	0.096 U	0.095 U	0.097 U	0.095 U	0.15	0.39	0.095 U	0.096 U	0.42	0.096 U	0.096 U	0.096 U	0.89	1.3
Pyrene	0.096 U	0.095 U	0.095 U	0.095 U	0.096 U	0.095 U	0.097 U	0.095 U	0.14	0.096 U	0.095 U	0.096 U	0.096 U	0.096 U	0.096 U	0.096 U	0.096 U	0.096 U
Total cPAHs	0.0725 U	0.0717 U	0.0717 U	0.0717 U	0.0725 U	0.0717 U	0.0732 U	0.0717 U	0.0717 U	0.0725 U	0.0717 U	0.0725 U	0.0725 U	0.0725 U	0.0725 U	0.0725 U	0.0725 U	0.0725 U
VOCs (μg/L)																		
Benzene	4.3	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U
Ethylbenzene	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Methyl-t-Butyl Ether (MTBE)	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
o-Xylene	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
p/m-Xylene	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.4	1.0 U				
Toluene	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Xylenes (total)	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.4	1.0 U				

TABLE E-1: GROUNDWATER SAMPLE ANALYTICAL RESULTS 1,2

ExxonMobil/ADC Property, Ecology Site ID 2728 Everett, Washington

Well ID	MW-A5	MW-A6	MW-A7	MW-A8	RW-2	Sump 1	Sump 2	W-1	١ ١	N-2	W-3	W-6	W-10R	W-15R	W-15R	W-17
Date Sampled	01/05/2015	01/05/2015	01/05/2015	01/05/2015	01/06/2015	01/08/2015	01/08/2015	01/07/2015	01/07/2015	01/07/2015 FD	01/07/2015	01/08/2015	1/7/2015	01/08/2015	1/8/2015 FD	01/08/2015
TPH (μg/L)																
TPH as Gasoline	100 U	100 U	100 U	100 U	340	100 U	1,900	300	490 J	1,000 J	100 U	450	350	2,500	2,900 J	1,000
TPH as Diesel	240	100 U	100 U	100 U	270	100 U	11,000	1,900	1,300	970	250	390	870	3,000	3,000	990
TPH as Motor Oil Range	100 U	100 U	100 U	100 U	100 U	100 U	2,900	230	100 U	100 U	100 U	100 U	150	100 U	100 U	290
PAHs (μg/L)																
1-Methylnaphthalene	0.095 U	0.096 U	0.095 U	0.096 U	0.096 U	0.099 U	38	14	25	23	0.75	7.9	17	92	93	0.45
2-Methylnaphthalene	0.095 U	0.096 U	0.095 U	0.096 U	0.096 U	0.099 U	4.5	9.1	12	11	0.095 U	0.097 U	4.2	120	120	0.096 U
Acenaphthene	2.8	0.28	0.095 U	0.096 U	0.096 U	0.099 U	8.8	1.9	2.6	2.3	0.46	0.82	3.8	3.3	4.1	0.32
Acenaphthylene	0.095 U	0.096 U	0.095 U	0.096 U	0.096 U	0.099 U	2.6	0.096 U	0.096 U	0.095 U	0.095 U	0.16	0.096 U	0.36	0.53	0.096 U
Anthracene	0.095 U	0.096 U	0.095 U	0.096 U	0.096 U	0.099 U	3.8	0.35	0.14	0.14	0.095 U	0.097 U	0.19	0.28	0.26	0.096 U
Benzo (a) anthracene	0.095 U	0.096 U	0.095 U	0.096 U	0.096 U	0.099 U	8.3	0.24	0.096 U	0.095 U	0.095 U	0.097 U	0.096 U	0.095 U	0.095 U	0.096 U
Benzo (a) pyrene	0.095 U	0.096 U	0.095 U	0.096 U	0.096 U	0.099 U	8.1	0.11	0.096 U	0.095 U	0.095 U	0.097 U	0.096 U	0.095 U	0.095 U	0.096 U
Benzo (b) fluoranthene	0.095 U	0.096 U	0.095 U	0.096 U	0.096 U	0.099 U	4.4	0.14	0.096 U	0.095 U	0.095 U	0.097 U	0.096 U	0.095 U	0.095 U	0.096 U
Benzo (g,h,i) perylene	0.095 U	0.096 U	0.095 U	0.096 U	0.096 U	0.099 U	4.3	0.096 U	0.096 U	0.095 U	0.095 U	0.097 U	0.096 U	0.095 U	0.095 U	0.096 U
Benzo (k) fluoranthene	0.095 U	0.096 U	0.095 U	0.096 U	0.096 U	0.099 U	5.0	0.10	0.096 U	0.095 U	0.095 U	0.097 U	0.096 U	0.095 U	0.095 U	0.096 U
Chrysene	0.095 U	0.096 U	0.095 U	0.096 U	0.096 U	0.099 U	6.3	0.36	0.096 U	0.095 U	0.095 U	0.097 U	0.096 U	0.095 U	0.095 U	0.096 U
Dibenz (a,h) anthracene	0.095 U	0.096 U	0.095 U	0.096 U	0.096 U	0.099 U	1.7	0.096 U	0.096 U	0.095 U	0.095 U	0.097 U	0.096 U	0.095 U	0.095 U	0.096 U
Fluoranthene	0.095 U	0.096 U	0.095 U	0.096 U	0.096 U	0.099 U	24	2.2	0.096 U	0.095 U	0.095 U	0.097 U	0.21	0.26	0.19	0.13
Fluorene	0.13	0.096 U	0.095 U	0.096 U	0.096 U	0.099 U	8.3	1.9	2.8	2.2	0.37	1.0	2.3	4.1	4.0	0.36
Indeno (1,2,3-c,d) pyrene	0.095 U	0.096 U	0.095 U	0.096 U	0.096 U	0.099 U	3.5	0.096 U	0.096 U	0.095 U	0.095 U	0.097 U	0.096 U	0.095 U	0.095 U	0.096 U
Naphthalene	0.095 U	0.096 U	0.095 U	0.096 U	0.096 U	0.099 U	0.97 U	0.096 U	0.096 U	0.095 U	0.095 U	0.097 U	0.096 U	0.095 U	0.095 U	0.096 U
Phenanthrene	0.19	0.096 U	0.095 U	0.096 U	0.096 U	0.099 U	12	3.5	2.6	2.5	0.095 U	0.64	2.1	3.2	3.6	0.15
Pyrene	0.095 U	0.096 U	0.095 U	0.096 U	0.096 U	0.099 U	32	1.5	0.10	0.095 U	0.095 U	0.097 U	0.14	0.20	0.13	0.33
Total cPAHs	0.0717 U	0.0725 U	0.0717 U	0.0725 U	0.0725 U	0.0747 U	10.45	0.1712	0.0725 U	0.0717 U	0.0717 U	0.0732 U	0.0725 U	0.0717 U	0.0717 U	0.0725 U
VOCs (µg/L)																
Benzene	0.50 U	0.50 U	0.50 U	0.50 U	0.53	0.50 U	0.72	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	0.50 U	1.9	2.1	0.50 U
Ethylbenzene	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Methyl-t-Butyl Ether (MTBE)	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
o-Xylene	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.4	1.4	1.0 U
p/m-Xylene	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.9	1.0 U	1.0 U	2.6	2.3	1.0 U				
Toluene	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.2	1.2	1.0 U
Xylenes (total)	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.9	1.0 U	1.0 U	4.0	3.6	1.0 U				

NJ = The result is estimated and the identification is tentative due to a poor match with the reference standard.

U = not detected at or above the laboratory reporting limit shown.

UJ = not detected at or above value shown, which is the estimated reporting limit.

Abbreviations:

-- = not analyzed

μg/L = micrograms per liter cPAHs = carcinogenic polycyclic aromatic hydrocarbons

FD = field duplicate

TPH = total petroleum hydrocarbons

PAHs = polycyclic aromatic hydrocarbons

VOCs = volatile organic compounds

^{1.} Data qualifiers are as follows:

J = The result is an approximation.

		AD-1	AD-1	AD-2	AD-2	AD-3	AD-3	AD-4	AD-5	AD-5	AD-5	AD-6	AD-7	AD-8	AD-8	AD-8	AD-9	AD-9	AD-10
L	Sample Date	1/15/1990	1/15/1990	1/15/1990	1/15/1990	1/15/1990	1/15/1990	1/15/1990	1/15/1990	1/15/1990	1/15/1990	1/15/1990	1/15/1990	1/15/1990	1/15/1990	1/15/1990	1/15/1990	1/15/1990	1/15/1990
Analyte	Depth ³	0.5 to 1	3 to 3	0.5 to 1	2.5 to 3	0.5 to 1	1.5 to 2	0.5 to 1	0.5 to 1	1.5 to 2	2.5 to 3	0.5 to 1	0.5 to 1	0.5 to 1	2.5 to 3	4.5 to 5	0.5 to 1	1.5 to 2	0.5 to 1
ТРН																			
Total Petroleum Hydrocarbons	S	780	3,900	250	280	31	9	720	8,800	1,900	2,300	2,700	5,800	1,600	2,700	6,200	630	4,400	33,000
Gasoline Range Organics																			
Diesel Range Organics																			
Motor Oil																			
VOCs																			
Benzene			0.4 U								0.4 U				0.4 U	0.4 U			
SVOCs																			
Carcinogenic PAHs as B(a)P ⁴																			

		AD-11	AD-11	AD-12	AD-12	AD-12	AD-13	AD-13	AD-14	AD-14	AD-15	AD-15	AD-16	AD-17	AD-18	AD-18	AD-19	AD-19	B-1
	Sample Date	1/15/1990	1/15/1990	1/15/1990	1/15/1990	1/15/1990	1/15/1990	1/15/1990	1/15/1990	1/15/1990	1/15/1990	1/15/1990	1/15/1990	1/15/1990	1/15/1990	1/15/1990	1/15/1990	1/15/1990	10/9/1990
Analyte	Depth ³	0.5 to 1	1.5 to 2	0.5 to 1	2.5 to 3	3 to 3.5	0.5 to 1	2 to 2.5	0.5 to 1	2 to 2.5	0.5 to 1	2.5 to 3	0.5 to 1	0.5 to 1	0.5 to 1	4 to 5	0.5 to 1	1 to 1.5	NA
ТРН																			
Total Petroleum Hydrocarbons	5	8,000	12,000	230	14,000	16,000	4,400	27,000	13,000	17,000	61	2,400	2,200	8,500	24	520	23,000	100,000	2,117
Gasoline Range Organics																			
Diesel Range Organics																			
Motor Oil																			
VOCs																			
Benzene					0.4 U	0.4 U		0.4 U		5.1	0.4 U	0.4 U	0.4 U	0.4 U					
SVOCs																			
Carcinogenic PAHs as B(a)P ⁴																			

		B-1	B-2	B-3	B-3	B-4	B-5	B-6	B-7	B-8	B-8	B-9	B-9	B-10	B-10	B-11	B-11	B-12	B-12
L	Sample Date	10/9/1990	10/9/1990	10/9/1990	10/9/1990	10/9/1990	10/9/1990	10/9/1990	10/9/1990	10/9/1990	10/9/1990	10/9/1990	10/9/1990	10/9/1990	10/9/1990	10/9/1990	10/9/1990	10/9/1990	10/9/1990
Analyte	Depth ³	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ТРН																			
Total Petroleum Hydrocarbon	S	446	90.6	213	831	65.2	701	428	434	126	174	469	643	206	231	323	406	191	11,775
Gasoline Range Organics																			
Diesel Range Organics																			
Motor Oil																			
VOCs																			
Benzene																			
SVOCs																			
Carcinogenic PAHs as B(a)P ⁴																			

		B-13	B-13	B-14	B-14	B-15	B-15	B-16	B-16	B-17	B-17	B-18	B-18	B-19	B-19	B-20	B-20	B-21	B-21
	Sample Date	10/9/1990	10/9/1990	10/9/1990	10/9/1990	10/9/1990	10/9/1990	10/9/1990	10/9/1990	10/9/1990	10/9/1990	10/9/1990	10/9/1990	10/9/1990	10/9/1990	10/9/1990	10/9/1990	10/9/1990	10/9/1990
Analyte	Depth ³	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
ТРН		·																	
Total Petroleum Hydrocarbons	;	277	15.9	212	128	132	17	1,898	9,718	1,513	2,139	46	738	626	10,577	117	46.9	2,116	1,974
Gasoline Range Organics																			
Diesel Range Organics																			
Motor Oil																			
VOCs																			
Benzene																			
SVOCs																			
Carcinogenic PAHs as B(a)P ⁴																			

		B-21	B-21	B-22	B-22	B-23	B-23	B-24	B-24	B-24	B-25	B-25	MW-10	MW-11	MW-12	MW-15	MW-16	MW-17	MW-18
	Sample Date	6/24/1991	6/24/1991	10/9/1990	10/9/1990	10/9/1990	10/9/1990	03/11/91	03/11/91	10/9/1990	10/9/1990	10/9/1990	3/9/1988	3/9/1988	3/9/1988	3/9/1988	3/9/1988	3/9/1988	3/9/1988
Analyte	Depth ³	23.5 to 24	27.5 to 29	NA	NA	NA	NA	2 to 4	3 to 5.5	NA	NA	NA	1.5 to 3	1.5 to 3	1.5 to 3	1.5 to 3	1.5 to 3	1.5 to 3	1.5 to 3
ТРН																			
Total Petroleum Hydrocarbon	S	12000	27	360	1,800	1,691	6,421	260	1,300	560	76	29.8	1,260	9,480	5 U	3,030	5 U	124	777
Gasoline Range Organics																			
Diesel Range Organics																			
Motor Oil																			
VOCs																			
Benzene		0.035	0.05 U					0.05 U	0.05 U				0.015 U	0.362	0.015 U	0.158 U	0.015 U	0.015 U	0.048
SVOCs																			
Carcinogenic PAHs as B(a)P ⁴																			

		MW-19	MW-19	MW-20	MW-20	MW-21	MW-21	MW-22	MW-22	MW-23	MW-24	MW-24	MW-27	MW-27	MW-28	MW-28	MW-29
	Sample Date	3/11/1991	3/11/1991	3/11/1991	3/11/1991	3/11/1991	3/11/1991	3/11/1991	3/11/1991	3/11/1991	3/11/1991	3/11/1991	06/24/91	06/24/91	06/24/91	06/24/91	06/24/91
Analyte	Depth ³	3.5 to 3.5	5 to 5	3.5 to 3.5	5 to 5	3.5 to 3.5	5 to 5	4 to 4	5 to 5	2.5 to 2.5	NA	NA	8.5 to 9	12.5 to 13.5	7.5 to 9	12.5 to 13.5	3 to 4
ТРН																	
Total Petroleum Hydrocarbon	IS	53	14	18	20	110	12,000	41,000	24,000	300	260	1,300	4,700	61	93	51	590
Gasoline Range Organics																	
Diesel Range Organics																	
Motor Oil																	
VOCs																	
Benzene		0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U
SVOCs																	
Carcinogenic PAHs as B(a)P ⁴																	

		MW-29	MW-30	MW-30	MW-6	MW-7	MW-8	MW-9	RW-1	W-1	W-2	W-3	W-4	W-5	W-6	W-7	B-34	B-34
	Sample Date	06/24/91	06/24/91	06/24/91	3/9/1988	3/9/1988	3/9/1988	3/9/1988	3/9/1988	2/23/1990	2/23/1990	2/23/1990	2/23/1990	2/23/1990	2/23/1990	2/23/1990	12/6/1993	12/6/1993
Analyte	Depth ³	7.5 to 9	8 to 9	13 to 13.5	1.5 to 3	1.5 to 3.5	1.5 to 3	1.5 to 3	to	3 to 3	to	3 to 3	4 to 4	3 to 3	3 to 3	3 to 3	4 to 5.5	12.5 to 14
ТРН																		
Total Petroleum Hydrocarboi	ns	730,000	4,900	7,700	80	605	1,580	33,500	1,730	13,000	17,000	28	4,600	2,300	1,200	910		
Gasoline Range Organics																	670	2,600
Diesel Range Organics																	500	4,800
Motor Oil																		
VOCs																		
Benzene		0.18	0.05 U	0.5	0.015 U	0.015 U	0.015 U	0.015 U	0.575								0.63	6.6
SVOCs																		
Carcinogenic PAHs as B(a)P ⁴																	0.0755 U	1.51 U

		DM-6	DM-7	DM-8	GP-1	GP-2	GP-3	GP-4	GP-7	GP-8	GP-8	GP-9	GP-10	GP-11	GP-12	GP-12	GP-13	GP-13	JP-1
	Sample Date	12/6/1999	12/8/1999	12/1/1999	3/20/1996	3/20/1996	3/20/1996	3/20/1996	3/20/1996	3/20/1996	3/20/1996	3/20/1996	3/20/1996	3/20/1996	3/20/1996	3/20/1996	3/20/1996	3/20/1996	6/21/2001
Analyte	Depth ³	5 to 6.5	NA	NA	10 to 10	11.5 to 11.5	6.5 to 6.5	6 to 6	5.5 to 5.5	7 to 7	8 to 8	8 to 8	7 to 7	6.5 to 6.5	11 to 11	12.5 to 12.5	7 to 7	10 to 10	4.5 to 7.5
ТРН																			
Total Petroleum Hydrocarbon	S																		
Gasoline Range Organics		10.5	20.1	5 U					150	3.9		880		160				1 U	5 U
Diesel Range Organics		44.3	482	44.4	276	322	1370	297	3,800	77	6.55	12,000	383	40.2	382	414	2 U	15	73.8
Motor Oil		25 U	225	102					4,300	160		2,900		60				41	100
VOCs																			
Benzene									0.05 U	0.05 U		0.05 U		0.05 U				0.05 U	0.05 U
SVOCs																			
Carcinogenic PAHs as B(a)P ⁴									0.69	0.52		0.31		0.038				0.052	

		JP-2	JP-2	JP-3	JP-4	JP-5	JP-6	JP-7	MW-31	MW-31	MW-32	MW-32	MW-33	MW-33	MW-35	MW-35	MW-36	MW-36	MW-37
	Sample Date	6/21/2001	6/21/2001	6/21/2001	6/21/2001	6/21/2001	6/21/2001	6/21/2001	12/6/1993	12/6/1993	12/6/1993	12/6/1993	12/6/1993	12/6/1993	12/6/1993	12/6/1993	12/6/1993	12/6/1993	12/6/1993
Analyte	Depth ³	0 to 3	3 to 6	4 to 6	3 to 6	3 to 6	6 to 9	1 to 2	2.5 to 4	12.5 to 14	NA	7.5 to 9	5 to 6.5	12.5 to 14	2.5 to 4	12.5 to 14	2.5 to 4	12.5 to 14	NA
ТРН																			
Total Petroleum Hydrocarbon	S																		
Gasoline Range Organics		5 U	5 U	5 U	6.04	5 U	5 U	26.5	1 U	31	1 U	1 U	49	1 U	1 U	1.3	30	1 U	180
Diesel Range Organics		134	379	10 U	180	210	26.6	264	13	49	17	10 U	1100	11	10 U	16	700	22	3,500
Motor Oil		341	942	25 U	58.2	375	69.3	923											
VOCs																			
Benzene		0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.77
SVOCs																			
Carcinogenic PAHs as B(a)P ⁴									0.0755 U	0.0755 U	0.367	0.0755 U	0.0755 U	0.0755 U	0.0755 U	0.0755 U	1.51 U	0.0755 U	0.3775 U

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		MW-37	TP-2	TP-3	TP-5	UG-1	UG-2	UG-3	UG-4	UG-5	UG-6	UG-7	UG-8	UG-9	UG-9	UG-10	UG-11	UG-12
L	Sample Date	12/6/1993	12/6/1993	12/6/1993	12/6/1993	9/25/2000	9/25/2000	9/25/2000	9/25/2000	9/25/2000	9/26/2000	9/26/2000	9/26/2000	9/26/2000	9/26/2000	9/26/2000	9/26/2000	9/26/2000
Analyte	Depth ³	NA	NA	NA	NA	5 to 7	10 to 12	7.5 to 9.5	5 to 7	5 to 7	5 to 7	5 to 7	5 to 7	2.5 to 4.5	10 to 12	5 to 7	5 to 7	5 to 7
ТРН																		
Total Petroleum Hydrocarbon	S																	
Gasoline Range Organics		170	1 U	3.4	1 U	173	55.3	108	5 U	5 U	5 U	5 U	3,410	6,050	630	5 U	5 U	5 U
Diesel Range Organics		380	10 U	16	10 U	27,100	364	190	10 U	10 U	10 U	402	5,180	8,560	2,170	10 U	153	10 U
Motor Oil						52,300	353	79.5	25 U	25 U	25 U	1,860	730	327	320	25 U	176	25 U
VOCs																		
Benzene		0.18	0.05 U	0.05 U	0.05 U									2.5 U				
SVOCs																		
Carcinogenic PAHs as B(a)P ⁴		0.0755 U	0.076 U	0.076 U	0.076 U													

Notes:

1. Data qualifiers are as follows:

U = not detected.

- 2. Results reported in milligrams per kilogram.
- 3. Depth measured in feet below ground surface.
- 4. The total toxic equivalent concentration was calculated following WAC 173-340-708(8)(e)

Abbreviations:

-- = no data available

B(a)P = benzo(a)pyrene

NA = not available

PAHs = polycyclic aromatic hydrocarbons

TPH = total petroleum hydrocarbons

VOCs = volatile organic compounds

		AB-1	AB-1	AB-1A	AB-2	AB-2	AB-2 *	AB-3	AB-3	AB-4	AB-5	AB-5	AB-5A	AP-1	AP-1	AP-2
	Sample Date	12/3/2010	12/3/2010	12/3/2010	6/21/2010	6/23/2010	6/23/2010	6/21/2010	6/22/2010	6/23/2010	6/25/2010	6/25/2010	6/22/2010	6/24/2010	6/24/2010	11/30/2010
Analyte	Depth ³	14	27	14	4.5 to 5	14 to 14	14 to 14	4.5 to 5	20 to 20	17.2 to 17.4	22 to 22.25	5 to 5.5	3 to 3.5	5 to 6.5	15 to 16.5	1 to 1.25
TPH																
Gasoline Range Organics		5.29 U	6.09 U	5.29 U	354	6.39 U	5.27 U	3.85 U	7.64 U	5.3 U	5.41 U	131	804	44.1	18.6 U	4.12 U
Diesel Range Organics		44.7	5.2	44.7	752	4.49 U	4.65 U	4.35 U	5.61 U	4.95 U	4.01 U	8840	7580	989	14.2	4.39 U
Motor Oil		21.9	9.37	21.9	803	6.54	4.65 U	4.35 U	9.4	8.36	5.45	11,000	464 U	1360	35.5	32.5
VOCs																
Benzene		0.00187 U	0.00219 U	0.00187 U	0.0048 U	0.00209 U	0.00192 U	0.00149 U	0.00277 U	0.0293	0.0969 U	0.0949	0.195	0.00222 U	0.00631 U	0.0009 U
SVOCs																
Carcinogenic PAHs as B(a)P	,4	0.00652405	0.006 U	0.00652405	0.027882	0.003 U	0.003 U	0.003 U	0.004 U	0.003 U	0.003 U	0.0200215	0.15679	0.18503	0.007 U	0.018131
New PAH calculations fro	m DB															
Carcinogenic PAHs (3 sig fig	js)	0.00652	0.00319 U	0.00652	0.0279	0.00286 U	0.00286 U	0.00282 U	0.00362 U	0.00319 U	0.00297 U	0.0200	0.157	0.185	0.00684 U	0.00291 U
Carcinogenic PAHs (2 sig fig	js)	0.0065	0.0032 U	0.0065	0.028	0.0029 U	0.0029 U	0.0028 U	0.0036 U	0.0032 U	0.0030 U	0.020	0.16	0.19	0.0068 U	0.0029 U
Carcinogenic PAHs (all digit	ts)	0.00652405	0.0031861 U	0.00652405	0.027882	0.00286145 U	0.00286145 U	0.00281615 U	0.003624 U	0.0031861 U	0.0029747 U	0.0200215	0.15679	0.18503	0.0068403 U	0.00290675 U

		AP-2	AP-3	AP-3	AP-4	AP-4	AP-4	AP-5	AP-5	AP-5	AP-6	AP-6	AP-6	AP-7	AP-7	AP-7	AP-7
L	Sample Date	12/7/2010	11/30/2010	12/7/2010	11/30/2010	12/7/2010	12/7/2010	11/30/2010	12/07/2010	12/07/2010	11/30/2010	12/02/2010	12/02/2010	10/28/2010	12/07/2010	12/07/2010	12/07/2010
Analyte	Depth ³	13.5 to 14	1 to 1.25	8.5 to 9	1 to 1.25	6 to 6.5	14.5 to 15	1 to 1.25	1.5 to 1.75	14 to 14.5	NA	23 to 23	23 to 23.25	NA	10 to 10.5	10 to 10.5	14.5 to 15
ТРН																	
Gasoline Range Organics		5.44 U	4.81 U	9.43 U	6.04 U	8.25 U	4.91 U	44.8	652	45.1 U	184	5.12 U	5.65 U	4.63 U	1.39 U	44.3	51.8
Diesel Range Organics		4.56 U	8.37	4.62 U	6.95	6.64 U	4.73 U	44.4	440	8,660	1,990	45.3	13.2	3.43	3.04	553	717
Motor Oil		8.98	106	15.7	111	16.6	4.73 U	369	176	8,980	129	37.1	10.5	2.39	119	836	861
VOCs																	
Benzene		0.0022 U	0.00117 U	0.0032 U	0.00119 U	0.00316 U	0.00202 U	0.00094 U	0.0353	0.0168 U	0.00156	0.00115 U	0.00123 U	0.00108 U	0.00101 U	0.00962 U	0.00441 U
SVOCs																	
Carcinogenic PAHs as B(a)P ⁴		0.003 U	0.0091646	0.0090492	0.0119794	0.00866615		0.009754	0.045062	0.39632	0.0464755	0.0044549	0.0044718	0.0060143	0.042179	0.072838	0.00280105 U
New PAH calculations from	n DB																
Carcinogenic PAHs (3 sig figs		0.0181	0.00916	0.00905	0.0120	0.00783		0.00975	0.0451	0.396	0.0465	0.00445	0.00447	0.00601	0.0422	0.0728	0.00280 U
Carcinogenic PAHs (2 sig figs	5)	0.018	0.0092	0.0090	0.012	0.0078		0.0098	0.045	0.40	0.046	0.0045	0.0045	0.0060	0.042	0.073	0.0028 U
Carcinogenic PAHs (all digits,)	0.018131	0.0091646	0.0090492	0.0119794	0.00783265		0.009754	0.045062	0.39632	0.0464755	0.0044549	0.0044718	0.0060143	0.042179	0.072838	0.00280105 U

		BN-SB04	BN-SB04	BN-SB05	BN-SB05	BN-SB06	BN-SB06	BN-SB06 *	BN-SB07	BN-SB07	BN-SB08	BN-SB08	BN-SB09	BN-SB09	B-POE	B-WROW
	Sample Date	10/21/2013	10/21/2013	10/21/2013	10/21/2013	10/21/2013	10/21/2013	10/21/2013	10/18/2013	10/18/2013	2/4/2014	2/10/2014	2/4/2014	2/10/2014	11/3/2010	7/1/2010
Analyte	Depth ³	4 to 5	24 to 24.5	4 to 5	24 to 24.5	4 to 5	24 to 24.5	24 to 24.5	4 to 5	24.5 to 25	5 to 5.5	23.5 to 24	8.5 to 9	23.5 to 24	NA	NA
TPH																
Gasoline Range Organics		8.15 U	5.86 U	4.76 U	7.89 U	5.96 U	6.46 U	6.37 U	5.74 U *	6.03 U *	5.28 U	6.12 U	5.71 U	4.82 U	579	365
Diesel Range Organics		4.46 U	4.84 U	27.1	4.94 U	4.82 U	4.87 U	4.93 U	12.8	5.85 U	13.2	5.89 U	5.6 U	5.46 U	5,540	3,400
Motor Oil		4.46 U	4.84 U	236	4.94 U	30	4.87 U	4.93 U	23.4	16	19.1	5.89 U	19.1	5.46 U	4,560	406
VOCs																
Benzene		0.00215 U	0.0018 U	0.00186 U	0.00237 U	0.00194 U	0.00198 U	0.00202 U	0.00206 U	0.00198 U	0.00194 U	0.0019 U	0.00166 U	0.00184 U	0.0116	0.118 U
SVOCs																
Carcinogenic PAHs as B(a)P	,4	0.00827585	0.003 U	0.225606	0.004 U	0.0114253	0.003 U	0.003 U	0.0412686	0.003 U	0.002 U	0.003 U	0.002 U	0.003 U	0.49277	0.1186485
New PAH calculations fro	m DB															
Carcinogenic PAHs (3 sig fig	js)	0.00748	0.00310 U	0.225	0.00354 U	0.0107	0.00311 U	0.00310 U	0.0394	0.00304 U	0.00248 U	0.00297 U	0.00247 U	0.00283 U	0.287	0.0725
Carcinogenic PAHs (2 sig fig	js)	0.0075	0.0031 U	0.22	0.0035 U	0.011	0.0031 U	0.0031 U	0.039	0.0030 U	0.0025 U	0.0030 U	0.0025 U	0.0028 U	0.29	0.073
Carcinogenic PAHs (all digit	ts)	0.0074799	0.0030955 U	0.22459	0.00354095 U	0.0107261	0.0031106 U	0.0030955 U	0.039412	0.00304265 U	0.00248395 U	0.00296715 U	0.00246885 U	0.00283125 U	0.28676	0.072545

		CE-1	CE-1	CE-1	CE-1	CE-2	CE-2	CE-2	CE-2	CE-2 *	CE-2	CE-2 *	CE-3	CE-3	CE-3	CE-3	CE-4	CE-4	CE-4
	Sample Date	2/18/2010	2/18/2010	2/19/2010	2/19/2010	2/18/2010	2/18/2010	2/22/2010	2/22/2010	2/22/2010	2/22/2010	2/22/2010	2/18/2010	2/18/2010	2/22/2010	2/22/2010	2/18/2010	2/18/2010	2/19/2010
Analyte	Depth ³	0.5 to 1	0.5 to 3	6.5 to 8	7.5 to 7.5	1 to 4	3 to 3.5	2 to 4.5	4 to 8	4 to 8	7 to 7	7 to 7	1 to 4	3.5 to 4	4 to 8	4.5 to 4.5	0.5 to 4	2.5 to 3	5 to 7
ТРН																			
Gasoline Range Organics		5.45 U						367			348	711		7.88 U		89.8		6.36 U	
Diesel Range Organics			4.81 U	237		5,800			494	369			4.05 U		2,040		189		16
Motor Oil			6.79	286		661			55.9	60.8			4.05 U		304		446		40.5
VOCs																			
Benzene		0.00203 U			0.0158 U		0.189 U	0.00211 U			0.00234 U	0.00255 U		0.00214 U		0.0019		0.00564	
SVOCs																			
Carcinogenic PAHs as B(a)P ⁴			0.55852	0.1128		0.332005			0.23535	0.14868			0.07039		0.0392309		0.062055		0.0071545
New PAH calculations from	n DB																		
Carcinogenic PAHs (3 sig figs			0.505	0.0971		0.283			0.186	0.121			0.0750		0.0276		0.0605		0.00629
Carcinogenic PAHs (2 sig figs			0.51	0.097		0.28			0.19	0.12			0.075		0.028		0.061		0.0063
Carcinogenic PAHs (all digits,)		0.50535	0.09712		0.28344			0.18578	0.1207			0.074986		0.027574		0.060511		0.0062853

		CE-4	CE-5	CE-5	CE-5	CE-5	CE-6	CE-6	CE-6	CE-6	CE-7	CE-7	CE-7	CE-7	CE-8	CE-8	CE-8	CE-8 *
L	Sample Date	2/19/2010	2/18/2010	2/18/2010	2/19/2010	2/19/2010	6/13/2011	6/13/2011	6/13/2011	6/13/2011	6/13/2011	6/13/2011	6/13/2011	6/13/2011	6/13/2011	6/13/2011	6/13/2011	6/13/2011
Analyte	Depth ³	7 to 7	0.5 to 4	2.5 to 3	5 to 8	6 to 6	0.5 to 5	4 to 4	5 to 8	7.5 to 7.5	0.5 to 5	2 to 2	5 to 8	6 to 6	0.5 to 5	2.2 to 2.2	5 to 10	5 to 10
ТРН																		
Gasoline Range Organics		5.4 U		5.93 U		6.39 U		1.12 J		3.83 J		142 B		2470 B		5.41 B		
Diesel Range Organics			10.1		6.58		1.47 J		5390		5600		1740		5,290		2,540	2,580
Motor Oil			40.6		20.7		8.46 B		1220		4620		2030		5,810		2,850	2,820
VOCs																		
Benzene		0.00397		0.00245 U		0.0023 U		0.00166 U		0.00128 U		0.00175 J		0.053		0.0011 U		
SVOCs																		
Carcinogenic PAHs as B(a)P ⁴			0.0625177		0.00290705		0.00088726		0.261309		0.59763		0.553626		0.380409		0.2461205	0.241073
New PAH calculations from	n DB																	
Carcinogenic PAHs (3 sig figs	5)		0.0573		0.00273 U		0.000546		0.228		0.512		0.488		0.361		0.226	0.223
Carcinogenic PAHs (2 sig figs	5)		0.057		0.0027 U		0.00055		0.23		0.51		0.49		0.36		0.23	0.22
Carcinogenic PAHs (all digits)		0.057262		0.00272555 U		0.0005461		0.2283		0.5117		0.4881		0.3609		0.226475	0.22297

		CE-8	CE-8 *	CE-SB01	CE-SB01	CE-SB01	CE-SB02	CE-SB02	EA-SB01	EA-SB01	EA-SB02	EA-SB02	EA-SB03 *	EA-SB03	EA-SB03	EA-SB03	EA-SB04
	Sample Date	6/13/2011	6/13/2011	10/23/2013	10/23/2013	10/23/2013	10/14/2013	10/23/2013	10/14/2013	10/28/2013	10/14/2013	10/28/2013	10/30/2013	10/30/2013	10/30/2013	10/30/2013	10/17/2013
Analyte	Depth ³	8 to 8	8 to 8	4 to 5	9.5 to 10.5	24 to 24.5	4 to 5	19.5 to 20	4.5 to 5	19.5 to 20	4 to 5	21 to 21.5	4 to 5	4 to 5	12 to 12.5	19.5 to 20	4.5 to 5
ТРН																	
Gasoline Range Organics		33.1 B	27.4 B	42.2	318	6.87 U	1920	9.01 U	697	25.2	120	46.2 U	124	98.6	25 U	9.02 U	613
Diesel Range Organics				20.2	786	4.93 U	1670	4.86 U	25100	87.2	1840	46.4	534	721	180	4.98 U	249
Motor Oil				19.2	661	4.93 U	205	4.86 U	3240	49.1	581	64.1	249	357	410	7.46	50.1
VOCs																	
Benzene		0.00155 U	0.00239 J	0.00265	0.126	0.00218 U	0.0176	0.00234 U	0.114 U	0.00195 U	0.00549	0.0119 U	0.00489	0.0171	0.00699 U	0.0027 U	0.0187
SVOCs																	
Carcinogenic PAHs as B(a)P ⁴	4			0.726133	81.7425	0.04886665	0.224456	0.002 U	0.5927955	0.002 U	0.261857	0.01 U	0.066892	0.0813715	0.424714	0.00293505	0.01252905
New PAH calculations from	m DB																
Carcinogenic PAHs (3 sig fig.	s)			0.605	64.0	0.0358	0.168	0.00250 U	0.426	0.00249 U	0.225	0.0112 U	0.0505	0.0612	0.260	0.00250 U	0.00851
Carcinogenic PAHs (2 sig fig.	s)			0.60	64	0.036	0.17	0.0025 U	0.43	0.0025 U	0.23	0.011 U	0.051	0.061	0.26	0.0025 U	0.0085
Carcinogenic PAHs (all digits	s)			0.60477	64.015	0.0357675	0.16763	0.00249905 U	0.425915	0.0024915 U	0.22519	0.011174 U	0.050507	0.061176	0.26018	0.00249905 U	0.0085085

		EA-SB04	EA-SB05	EA-SB05	EA-SB06	EA-SB06	EA-SB06	EA-SB06	FA-SB01	FA-SB01 *	FA-SB01	FA-SB02	FA-SB02	FA-SB03	FA-SB03	FA-SB03
	Sample Date	10/23/2013	10/29/2013	10/29/2013	10/14/2013	10/28/2013	10/28/2013	10/28/2013	10/15/2013	10/25/2013	10/25/2013	10/15/2013	10/24/2013	10/24/2013	10/24/2013	10/24/2013
Analyte	Depth ³	19.5 to 20	4.5 to 5	19 to 19.5	3.5 to 4.5	6 to 6.5	12 to 12.5	19.5 to 20	5 to 5.5	19.5 to 20	19.5 to 20	5 to 6	19.5 to 20	4 to 5	6.5 to 7	19.25 to 19.75
TPH																
Gasoline Range Organics		4.85 U	165	44.9 U	1,200	1480	47.5 U	5.78 U	110	5.33 U	5.38 U	432	6.73 U	30.3	175	5.96 U
Diesel Range Organics		4.82 U	1,300	20.8 U	1,200	750	21.8	6.05	662	4.94 U	4.89 U	8,360	4.97 U	144	77.6	4.93 U
Motor Oil		4.82 U	571	149	56 U	4.92 U	59.7	6.42	186	4.94 U	4.89 U	343	4.97 U	270	78.1	4.93 U
VOCs																
Benzene		0.00652	0.00914	0.00989 U	2.79	1.92	0.0827	0.00182 U	0.00257 U	0.00176 U	0.00178 U	0.0022 U	0.00193 U	0.00259	0.00193 U	0.00175 U
SVOCs																
Carcinogenic PAHs as B(a)P	o ⁴	0.003 U	0.042333	0.01 U	0.1502214	0.3085254	0.153892	0.0029395	0.302975	0.002 U	0.002 U	0.1872005	0.002 U	0.0478557	0.0191474	0.002 U
New PAH calculations from	om DB															
Carcinogenic PAHs (3 sig fig	gs)	0.00251 U	0.0327	0.0105 U	0.00655	0.0207	0.0664	0.00249 U	0.279	0.00247 U	0.00248 U	0.119	0.00248 U	0.0399	0.0176	0.00246 U
Carcinogenic PAHs (2 sig fig	gs)	0.0025 U	0.033	0.010 U	0.0065	0.021	0.066	0.0025 U	0.28	0.0025 U	0.0025 U	0.12	0.0025 U	0.040	0.018	0.0025 U
Carcinogenic PAHs (all digit	ts)	0.00251415 U	0.032727	0.0104945 U	0.006546	0.020726	0.06637	0.0024915 U	0.2789	0.00246885 U	0.00248395 U	0.118865	0.00248395 U	0.039904	0.017634	0.0024613 U

		FA-SB04	FA-SB04	FA-SB05	FA-SB05	FA-SB06	FA-SB06	FA-SB06	FA-SB07	FA-SB07	KC-SB01 *	KC-SB01	KC-SB01	KC-SB02	KC-SB02	KC-SB02 *
	Sample Date		10/24/2013	10/24/2013	10/24/2013	10/25/2013	10/25/2013	10/25/2013	10/25/2013	10/25/2013	10/30/2013	10/30/2013	10/30/2013	2/4/2014	2/10/2014	2/10/2014
Analyte	Depth ³	4 to 5	19.5 to 20	4.5 to 5	19.5 to 20	4 to 5	7.5 to 8	19.5 to 20	4 to 5	19.5 to 20	4.5 to 5	4.5 to 5	24.5 to 25	4.5 to 5	6.5 to 7	19.5 to 20
ТРН																
Gasoline Range Organics		106	6.68 U	29.6	6.58 U	13.8	381	9.12	14.3	5.27 U	4.68 U	4.23 U	6.46 U	15.7	29.9 U	30.7 U
Diesel Range Organics		105	4.96 U	49.3	4.94 U	86.1	3,130	4.89 U	24.1 U	4.94 U	25 U	24.9 U	4.86 U	95.1	13.4	5.08
Motor Oil		103	4.96 U	60	4.94 U	107	244 U	4.89 U	112	4.94 U	102	109	4.86 U	5.93	46.9	22.4
VOCs																
Benzene		0.0026	0.00214 U	0.00263	0.00202 U	0.00178 U	0.104 U	0.00182 U	0.00224 U	0.00168 U	0.00137 U	0.0017 U	0.00202 U	0.00152 U	0.00784 U	0.00815 U
SVOCs																
Carcinogenic PAHs as B(a)P ²	1	0.190065	0.002 U	0.00549225	0.003 U	0.505989	0.074794	0.002 U	0.0967848	0.002 U	0.026091	0.095772	0.002 U	0.0030245	0.007 U	0.0076 U
New PAH calculations from	m DB															
Carcinogenic PAHs (3 sig fig.	s)	0.171	0.00250 U	0.00508	0.00251 U	0.469	0.0319	0.00248 U	0.0883	0.00250 U	0.0251	0.0848	0.00248 U	0.00268	0.00731 U	0.00755 U
Carcinogenic PAHs (2 sig fig.	s)	0.17	0.0025 U	0.0051	0.0025 U	0.47	0.032	0.0025 U	0.088	0.0025 U	0.025	0.085	0.0025 U	0.0027	0.0073 U	0.0076 U
Carcinogenic PAHs (all digits	s)	0.17144	0.00249905 U	0.0050822	0.00251415 U	0.4686	0.03188	0.0024764 U	0.088301	0.00249905 U	0.025095	0.084818	0.00248395 U	0.0026805	0.0073084 U	0.00755 U

		KC-SB02	MW-A1	MW-A1	MW-A2	MW-A2	MW-A3	MW-A3	MW-A4	MW-A4 *	MW-A4	MW-A5	MW-A5	MW-A6	MW-A6	MW-7A	MW-7AB	MW-A8
	Sample Date	2/10/2014	2/4/2008	2/4/2008	2/4/2008	2/4/2008	6/24/2010	6/24/2010	6/24/2010	6/24/2010	6/24/2010	6/24/2010	6/24/2010	6/25/2010	6/25/2010	11/30/2010	12/1/2010	10/29/2013
Analyte	Depth ³	19.5 to 20	7 to 7	8.5 to 8.5	6 to 6.5	7.5 to 8	10 to 11	20 to 21	20 to 21	15 to 15	15 to 15	10 to 10	20 to 20	12 to 12	20 to 20	1 to 1	11.5 to 12	6 to 6.5
TPH																		
Gasoline Range Organics		32.8 U	3.22 U	168	10.2 U	203	5.98 U	4.69 U	4.74 U	7.5 U	4.74 U	7.16 U	5.39 U	5.74 U	6.29 U	4.41 U	5.85 U	4.34 U
Diesel Range Organics		5.08	74.1	5,160	33.3	2,370	7.63	4.57 U	7.25	46.1	12.1	3.74 U	3.95 U	23.8	273	10	2.36	48.8 U
Motor Oil		16.3	79.5	471 U	290	279	22.1	6.81	17	81.1	12.2	4.7	4.06	119	482	228	2.93	535
VOCs																		
Benzene		0.00859 U	0.0322 U	0.0319 U	0.102 U	0.0355	0.00212 U	0.002 U	0.00192 U	0.002 U	0.00215 U	0.00236 U	0.00191 U	0.00225 U	0.00318 U	0.0009 U	0.00123 U	0.00152 U
SVOCs																		
Carcinogenic PAHs as B(a)P ⁴	4	0.0075 U					0.0121667	0.062577023	0.013497	0.1729998	0.122063	0.0162077	0.00354135	0.01151025	0.127304	0.0329254	0.0028948	0.1333165
New PAH calculations from	m DB																	
Carcinogenic PAHs (3 sig fig.	is)	0.00753 U					0.00996	0.0575	0.00667	0.0542	0.0342	0.0124	0.00292 U	0.00840	0.115	0.0329	0.00331	0.120
Carcinogenic PAHs (2 sig fig.	is)	0.0075 U					0.0100	0.057	0.0067	0.054	0.034	0.012	0.0029 U	0.0084	0.12	0.033	0.0033	0.12
Carcinogenic PAHs (all digits	s)	0.0075349 U					0.009963	0.057476	0.006674	0.054214	0.03418	0.012402	0.00292185 U	0.008401	0.11532	0.032931	0.0033107	0.120265

	I			55.4544		55.4544		55.454		55.4545	55.4544	55.4544			55.4545	
		MW-A8	PE-SB02	PE-SB02	PE-SB03	PE-SB03	PE-SB04	PE-SB04	PE-SB05	PE-SB05	PE-SB06	PE-SB06	PE-SB06	PE-SB07	PE-SB07	PE-SB07
L	Sample Date	10/29/2013	10/22/2013	10/22/2013	10/16/2013	10/22/2013	10/22/2013	10/22/2013	2/7/2014	2/7/2014	2/7/2014	2/7/2014	2/7/2014	2/3/2014	2/7/2014	2/7/2014
Analyte	Depth ³	14.5 to 15	6.5 to 7	19.5 to 20	4 to 5	19.5 to 20	4 to 5	19.5 to 20	8.5 to 9	19.5 to 20	6.5 to 7	11 to 11.5	19.5 to 20	4.5 to 5	10.5 to 11	12.5 to 13
ТРН	•															
Gasoline Range Organics		5.34 U	1330	13.2	210	10 U	115	8.01 U	5.11 U	5.27 U	4.78 U	6.23 U	6.17 U	384	5.66 U	22.8
Diesel Range Organics		5 U	8,790	4.9 U	5,180	5.98	122 U	4.87 U	15	5.59 U	49.5	8.97	5.76 U	5550	5.69 U	68.5
Motor Oil		5 U	3,450	4.9 U	1,590	4.89 U	649	4.87 U	50.7	20.7	511	49	5.76 U	2700	5.69 U	29.7
VOCs																
Benzene		0.00172 U	0.00192 U	0.00192 U	0.00209 U	0.00287 U	0.00173 U	0.00229 U	0.00167 U	0.00192 U	0.00234 U	0.00195 U	0.00209 U	0.00213 U	0.00183 U	0.00213 U
SVOCs																
Carcinogenic PAHs as B(a)P ⁴		0.002 U	0.5593369	0.003 U	0.0615071	0.004 U	0.0354661	0.004 U	0.0034139	0.003 U	0.0437901	0.00326165	0.003 U	0.4146625	0.003 U	0.01970075
New PAH calculations from	n DB															
Carcinogenic PAHs (3 sig figs))	0.00249 U	0.259	0.00284 U	0.0431	0.00410 U	0.0315	0.00368 U	0.00312	0.00282 U	0.0393	0.00299	0.00297 U	0.316	0.00285 U	0.0169
Carcinogenic PAHs (2 sig figs))	0.0025 U	0.26	0.0028 U	0.043	0.0041 U	0.032	0.0037 U	0.0031	0.0028 U	0.039	0.0030	0.0030 U	0.32	0.0029 U	0.017
Carcinogenic PAHs (all digits)		0.0024915 U	0.259179	0.0028388 U	0.043092	0.00409965 U	0.03153	0.00367685 U	0.0031249	0.00281615 U	0.039272	0.0029948	0.00296715 U	0.316205	0.0028539 U	0.0168785

		PE-SB07	PE-SB07	PE-SB07 *	PE-SB07	PE-SB07	PE-SB07	PE-SB08	PE-SB08	PE-SB08	PE-SB08	PE-SB09	PE-SB09	PE-SB10	PE-SB10	SA-B-1
	Sample Date	2/7/2014	2/7/2014	2/7/2014	2/7/2014	2/7/2014	2/7/2014	2/6/2014	2/6/2014	2/6/2014	2/6/2014	2/10/2014	2/10/2014	2/6/2014	2/6/2014	12/30/2011
Analyte	Depth ³	14.5 to 15	16.5 to 17	19.5 to 20	19.5 to 20	6.5 to 7	8.5 to 9	11 to 11.5	20.5 to 21	22.5 to 23	7 to 7.5	19.5 to 20	5 to 5.5	19.5 to 20	8.5 to 9	9
ТРН																
Gasoline Range Organics		14.3	6.08 U	5.56 U	5.8 U	193	123	61.3	5.45	5.39 U	6.13 U	5.4 U	45.2	4.19 U	4.82 U	249 U
Diesel Range Organics		12.5	4.86 U	17.6	25.1	4,220	1,440	484	24.9	9.45	6.12	5.84 U	96.3	5.55 U	5.63	61.6
Motor Oil		5.57 U	8.08	62.2	24.8	2,200	450	748	27.9	8.97	5.89 U	8.33	435	5.55 U	5.32 U	122
VOCs																
Benzene		0.00196 U	0.0019 U	0.0018 U	0.00187 U	0.00203 U	0.00185 U	0.00217 U	0.00179 U	0.00184 U	0.00279 U	0.00178 U	0.00198 U	0.00152 U	0.00178 U	0.0154 U
SVOCs																
Carcinogenic PAHs as B(a)P	₅ 4	0.003 U	0.003 U	0.003 U	0.003 U	0.20567725	0.0884605	0.159621	0.0036353	0.003 U	0.0041731	0.00349265	0.082304	0.0033721	0.003 U	0.01 U
New PAH calculations fro	om DB															
Carcinogenic PAHs (3 sig fig	gs)	0.00276 U	0.00299 U	0.00295 U	0.00299 U	0.139	0.0692	0.133	0.00294	0.00292 U	0.00290	0.00297 U	0.0529	0.00273 U	0.00263 U	0.0129 U
Carcinogenic PAHs (2 sig fig	gs)	0.0028 U	0.0030 U	0.0030 U	0.0030 U	0.14	0.069	0.13	0.0029	0.0029 U	0.0029	0.0030 U	0.053	0.0027 U	0.0026 U	0.013 U
Carcinogenic PAHs (all digit	ts)	0.0027633 U	0.0029898 U	0.00295205 U	0.0029898 U	0.1391425	0.069245	0.13285	0.0029362	0.00292185 U	0.0029042	0.00296715 U	0.052916	0.0027331 U	0.00263495 U	0.0129105 U

ExxonMobil/ADC Property Everett, Washington

		SA-B-2 *	SA-B-2	SA-B-3	SA-B-4	SA-B-5	SA-B-6	SA-B-7	SA-B-8	SA-B-9	SA-B-10	SA-B-11
	Sample Date	12/30/2011	12/30/2011	1/3/2012	1/5/2012	1/6/2012	1/13/2012	2/9/2012	3/26/2012	3/27/2012	3/27/2012	3/27/2012
Analyte	Depth ³	9	9	10	9	8	8	8	8	8	8	8
ТРН												
Gasoline Range Organics		297 U	45.7 U	338 U	315 U	9.15 U	7.49 U	46.7	42.5 U	51.6 U	47 U	54.7 U
Diesel Range Organics		156	30.9	27.7 U	25.6 U	11.1	5.27 U	822	24.6 U	61.3	291	99.5
Motor Oil		363	125	189	123	40.2	5.98	1,040	173	649	907	641
VOCs												
Benzene		0.0184 U	0.0183 U	0.0227 U	0.643 UJ	0.00376 U	0.00224 U	0.0109 U	0.0188 U	0.0196 U	0.0198 U	0.0206 U
SVOCs												
Carcinogenic PAHs as B(a)P ⁴		0.3531765	0.3070745	0.0701435	0.02 U	0.003 U	0.003 U	0.133976	0.016 U	0.016 U	0.019118	0.02 U

New PAH calculations from DB											
Carcinogenic PAHs (3 sig figs)	0.353	0.307	0.0701	0.0161 U	0.00308 U	0.00329 U	0.126	0.0156 U	0.0160 U	0.0163 U	0.0165 U
Carcinogenic PAHs (2 sig figs)	0.35	0.31	0.070	0.016 U	0.0031 U	0.0033 U	0.13	0.016 U	0.016 U	0.016 U	0.016 U
Carcinogenic PAHs (all digits)	0.3531765	0.3070745	0.0701435	0.0160815 U	0.0030804 U	0.0032918 U	0.126331	0.0156285 U	0.016006 U	0.016308 U	0.016459 U

Notes:

1. Data qualifiers are as follows:

J = detected at or above the reported estimate

U = not detected

UJ = estimated at the reporting limit

2. Results reported in milligrams per kilogram.

3. Depth measured in feet below ground surface.

4. The total toxic equivalent concentration was calculated following WAC 173-340-708(8)(e)

Abbreviations:

-- = no data available

B(a)P = benzo(a)pyrene

NA = not available

PAHs = polycyclic aromatic hydrocarbons

TPH = total petroleum hydrocarbons

VOCs = volatile organic compounds

APPENDIX F

PORT OF
EVERETT—
EXCAVATION
DELINEATION
REPORT



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April 21, 2021 Cardno 03144702.R04

Mr. Jason Cook Washington State Department of Ecology Toxics Cleanup Program P.O. Box 47600 Olympia, Washington 98504-7600

Port of Everett – Excavation Delineation Report

ExxonMobil ADC Agreed Order No.: DE 6184 2717/2731 Federal Avenue Everett, Washington

Mr. Cook:

SUBJECT

At the request of ExxonMobil Environmental and Property Solutions, on behalf of ExxonMobil Oil Corporation (ExxonMobil) and American Distribution Company (ADC), Cardno prepared the enclosed Port of Everett -Excavation Delineation Report presenting results of the soil investigation conducted between October 12 through October 14, 2020, January 25 through January 27, 2021, and February 5, 2021, at the subject site.

The purpose of the work was to pre-establish the vertical and lateral extents of the proposed remedial excavation such that collection of soil samples at the time of excavation is not necessary. Cardno requests that the Washington State Department of Ecology provide an opinion regarding whether the excavation extents have been adequately vertically and laterally defined as summarized in the enclosed report.

Please contact Mr. Bobby Thompson, Cardno Project Manager for this site, at 206 510 5855, or Ms. Jennifer Sedlachek, ExxonMobil Project Manager for this site at 469 913 3672 with any questions.

Sincerely,

Cameron Penner-Ash Assistant Project Manager Cardno

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ENCLOSURE

Cardno's ExxonMobil Environmental and Property Solutions Port of Everett – Excavation Delineation Drilling Report, dated April 21, 2021



cc: w/ enclosure

Mr. Erik Gerking, Port of Everett (Electronic copy via email)

Mr. Steve Miller, American Distribution Company (Electronic copy via email)

Ms. Sandra Caldwell, Washington State Department of Ecology (Electronic copy via email)

Ms. Jennifer Sedlachek, ExxonMobil Environmental and Property Solutions Company (Filed in project folder)

Port of Everett – Excavation Delineation Report

ExxonMobil ADC 2717/2731 Federal Avenue Everett, Washington

Cardno 03144702.R04

Prepared for ExxonMobil Environmental and Property Solutions

April 21, 2021





Keri Lynn Chappell

Port of Everett – Excavation Delineation Report

ExxonMobil ADC 2717/2731 Federal Avenue Everett, Washington

Cardno 03144702.R04

April 21, 2021

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April 21, 2021 Cardno i

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April 21, 2021 Cardno ii

1 Introduction

1.1 Site Information

Site Name: ExxonMobil ADC

Address: 2717/2731 Federal Avenue

Everett, Washington

Township/Section/Range: Township 29 North, Section 19, Range 5 East

Northern Tax Parcels: 00437161900101

00437161900100

Southern Tax Parcels: 00437161901000

Current Property Owners: Northern Parcel – American Distribution Company (ADC)

Southern Parcel – ExxonMobil Oil Corporation (ExxonMobil) **Agency/Regulatory ID No:** Washington Department of Ecology (Ecology) / FSID #2728

Agreed Order No.: DE 6184

1.2 Purpose

Cardno prepared this report presenting results of the soil sampling investigation conducted on October 12 to October 14, 2020, January 25 to January 27, 2021, and February 5, 2021, on Port of Everett property. The scope of work was performed in order to achieve the following objectives:

- > Advance exploratory soil borings to delineate the proposed remedial excavation extents.
- > Evaluate soil heterogeneity as related to potential preferential pathways that might impact the lateral and vertical extents of the proposed targeted remedial excavation.
- > Characterize the extent of hydrocarbons in soil on the Port of Everett property so that the collection of soil samples during the remedial excavation is not necessary.

The scope of work included:

- > The advancement of 44 excavation delineation soil borings (EB1 through EB41, EB31A, EB31B, and EB32A) to define the extents of the proposed remedial excavation on the Port of Everett property.
- > The advancement of seven step out excavation delineation soil borings (SB1 through SB7) to further define the extents of the proposed remedial excavation on the Port of Everett property.
- > The advancement of two geotechnical borings (GB1 and GB2) to aid in the development of future shoring wall plans to protect Federal Avenue during the remedial excavation.
- Conduct a site survey by a professional survey contractor following the delineation drilling activities to survey the locations of the borings and other relevant site features and utilities. The survey will be used to accurately document the lateral and vertical spacing of each data point to direct the planned remedial activities with a high level of precision.

2 Background

The ExxonMobil ADC site is located at 2717/2731 Federal Avenue, Everett, Snohomish County, Washington, adjacent to the Port of Everett (Plate 1). The site consists of three tax parcels: 00437161900101, 00437161900100, and 00437161901000 (Snohomish County, 2018). The northern parcels are owned by ADC and the southern parcel is owned by ExxonMobil. The property historically operated as a bulk petroleum storage, transfer, and distribution facility. The area of proposed excavation is located directly west

of the ExxonMobil ADC site within five combined tax parcels: 29051900301600, 29051900302500, 29051900302700, 29051900302800, and 29051900302900 (Snohomish County, 2018). The combined tax parcels, located within the Port of Everett, are currently leased for heavy industrial use to Everett Ship Repair, LLC, a subsidiary of Ice Cap Holding, LLC, and Dunlap Towing Company (Wood, 2019). In the early 1900s, the historical shoreline was approximately located along present day Federal Avenue (Plate 2). As development continued, the shoreline was extended westward until it reached its current boundary in 1973 (Wood, 2019). The proposed excavation will take place primarily in material used to backfill the bay and extend the shoreline.

3 Cleanup Level Selection

The site-specific residual saturation concentrations used as remediation levels to guide excavation delineation drilling activities, as defined in Wood Environmental & Infrastructure Solutions, Inc. draft *Site characterization/focused feasibility study report*, dated August 23, 2019 (Wood, 2019), are as follows:

TPHg: 2,470 mg/kgTPHd: 4,800 mg/kgTPHmo: 5,810 mg/kg

4 Port of Everett Subsurface Investigation and Survey

The purpose of this work was to delineate the proposed remedial excavation on the Port of Everett property. All soil boring activities were conducted in accordance with Cardno's *Excavation Delineation Work Plan* – *Port of Everett Property*, dated September 1, 2020 (Cardno 2020a); Cardno's *Subsequent Excavation Delineation Drilling Work Plan*, dated December 21, 2020 (Cardno, 2020b); Cardno's standard field protocol (Appendix A); and under the supervision of a licensed geologist.

4.1 Pre-Field Activities

During pre-planning, Cardno contracted Advanced Underground Utility Locating (AUUL), of Bellevue, Washington, to conduct a comprehensive evaluation of subsurface structures located on Port of Everett property and the City of Everett right-of-way (Federal Avenue). Using a combination of ground penetrating radar and portable electromagnetic survey, AUUL located the extents of sanitary sewer lines, underground power lines, telecommunication lines, and storm sewer lines. Holocene Drilling, Inc. (Holocene), of Puyallup, Washington, obtained Washington start cards from Ecology.

4.2 Subsurface Investigation

In order to completely define the extents of the Port of Everett targeted remedial excavation such that soil sampling at the time of the excavation will not be necessary, Cardno observed Holocene advance 51 excavation delineation soil borings (EB1 through EB41, EB31A, EB31B, EB32A, and SB1 through SB7) where historical data indicated residual concentrations of hydrocarbons above the site-specific residual saturation levels. Drilling was performed during two mobilizations with the first occurring in October 2020 and the second in late January through early February 2021. It was determined following the initial mobilization in October 2020 that supplementary delineation was required; however, additional coordination with the various stakeholders was necessary prior to the second mobilization.

4.2.1 October 2020 Mobilization

On October 12 through October 14, 2020, Cardno observed Holocene advance excavation delineation soil borings in accordance with Cardno's *Excavation Delineation Work Plan – Port of Everett Property*, dated September 1, 2020 (Cardno, 2020a). Per the work plan, 21 borings were advanced by a direct push drill rig. Based on the analytical results reported by the mobile laboratory (Appendix B), nine additional step out borings were advanced to further delineate the extents of the proposed remedial excavation. The locations of borings EB1 through EB30 are shown on Plates 3 through Plate 9 and boring logs are located in Appendix C. Soil samples collected from the borings were field screened and evaluated for the presence of residual hydrocarbon concentrations. Soil samples that indicated the presence of residual hydrocarbons were analyzed on site by Libby Environmental, Inc. (Libby Environmental), a State of Washington-certified mobile laboratory, for constituents of concern. Samples that did not indicate the presence of residual hydrocarbons were preserved for analysis at Libby Environmental's fixed-based laboratory.

Delineation of the remedial excavation extents was largely achieved during the October 2020 mobilization; however, it was determined a subsequent delineation drilling event was warranted to complete delineation activities to the north, northwest, and south.

4.2.2 <u>January/February 2021 Mobilization</u>

On January 25 through January 27 and February 5, 2021, Cardno observed Holocene advance excavation delineation soil borings in accordance with Cardno's *Subsequent Excavation Delineation Drilling Work Plan*, dated December 21, 2020 (Cardno, 2020b). A total of 11 borings were advanced by a direct push drill rig during the mobilization. Based on the analytical results reported by the mobile laboratory, seven additional step out borings were advanced by a direct push drill rig to further delineate the extents of the proposed remedial excavation. The locations of borings EB31 through EB41 and step out borings SB1 through SB7 are shown on Plates 3 through Plate 9 and boring logs are located in Appendix C. Soil samples collected from the borings were field screened and evaluated for the presence of residual hydrocarbon concentrations. Soil samples that indicated the presence of residual hydrocarbons were analyzed on site by Libby Environmental for constituents of concern. Samples that did not indicate the presence of residual hydrocarbons were preserved for analysis at the Libby Environmental fixed-based laboratory.

4.2.3 January 2021 Duplicate Borings

On January 25, 2021, boring EB31 met refusal at 9.5 feet bgs. The 9.5-foot sample depth contained residual hydrocarbons below the site-specific residual saturation remediation levels. On January 25, 2021, boring EB32 was advanced to a maximum depth of 12.5 feet bgs and soil samples were collected at intervals of 10 and 12.5 feet bgs for laboratory analysis. The 10-foot sample depth contained residual hydrocarbons above the site-specific residual saturation remediation levels. Boring EB32 was located approximately 30 feet west of boring EB31 and it was determined that vertical delineation was not achieved at boring EB31 due to the presence of residual hydrocarbons above the site-specific residual saturation remediation levels in the 10foot sample at boring EB32. On January 27, 2021, boring EB31A, located approximately 4 feet north of EB31, was advanced to a maximum depth of 15 feet bgs and soil samples were collected at 15 feet bgs for laboratory analysis. Field screening of the 15-foot sample at location EB31A did not indicate the presence of residual hydrocarbons and the boring was terminated at that depth. The fixed-based laboratory later reported that the 15-foot sample depth contained residual hydrocarbons above the site-specific residual saturation remediation levels. Vertical delineation was not achieved at EB31A thus EB31B, located approximately 4 feet north of EB31A, was advanced to a maximum depth of 20 feet bgs and soil samples were collected at 17.5 and 20 feet bgs for laboratory analysis. Both the 17.5 and 20-foot samples contained residual hydrocarbons below the site-specific residual saturation remediation levels and boring locations EB31, EB31A, and EB31B were determined to be vertically delineated.

Boring EB32 was located approximately 30 feet west of boring EB31A and it was determined that vertical delineation was not achieved at boring EB32 due to the presence of residual hydrocarbons above the site-specific residual saturation remediation levels in the 15-foot sample at boring EB31A. On January 27, 2021,

boring EB32A was advanced to a maximum depth of 20 feet bgs and soil samples were collected at 5, 7.5, 10, 15, 17.5, and 20 feet bgs for laboratory analysis. Only one sample, collected at 10 feet bgs, contained residual hydrocarbon concentrations above the site-specific residual saturation remediation levels and boring locations EB32 and EB32A were determined to be vertically delineated.

4.3 Laboratory Analyses

Soil samples were analyzed by either Libby's mobile or fixed-based laboratory for:

- > TPHg in accordance with NWTPH-Gx.
- > TPHd and TPHmo in accordance with NWTPH-Dx.

Cardno directed soil samples to be either analyzed in near real time in the mobile laboratory or preserved for analysis at the fixed-based laboratory based on field screening results. Laboratory results and COC documentation is included as Appendix B.

4.4 Geotechnical Boring Advancement

January 26, 2021, Cardno observed Holocene clear geotechnical borings GB1 and GB2 to 5 feet bgs using air knife clearance drilling equipment and hand tools. On January 27, 2021, Cardno observed Holocene advanced two geotechnical borings (GB1 and GB2) to aid in the development of a future shoring wall to protect Federal Avenue during the remedial excavation. The borings were advanced with a truck mounted hollow-stem auger drill rig. A split spoon sampler was advanced by a Diedric D-120 140-pound auto hammer calibrated and certified by Robber Miner Dynamic Testing, Inc., on November 19, 2020. Boring logs for GB1 and GB2 are included in Appendix C. Additional geotechnical data will be included in a future engineering design report for the site.

4.5 Topographic Land Survey

On February 4, 5, and 8, 2021, Cardno observed Alpha Subdivision Pro's Inc. Land Surveying and Planning (ASPI), of Everett, Washington, perform a comprehensive survey. The survey was conducted on and around the ExxonMobil ADC site and the Port of Everett parcels leased by Everett Ship Repair and Dunlap Towing Company. The survey consisted of physical site features, monitoring well locations, soil boring locations, above and below ground utilities, fence lines, property lines, right-of-ways, driveways, and vegetated areas. A comprehensive survey file was provided to Cardno on February 19, 2021.

4.6 Waste Management

The soil and decontamination water generated during drilling activities was temporarily stored on the ExxonMobil property in DOT-approved 55-gallon drums. Soil and decontamination water was transported by Advanced Chemical Transport, Inc., of Kent, Washington, to US Ecology Idaho Inc.'s Grandview, Idaho, facility, an ExxonMobil Approved Waste Sites List disposal facility. Waste documentation for soil and water are included in Appendix D.

5 Results of Excavation Delineation Investigation

Soil encountered during this investigation consisted of stratified layers of sand, silt, gravel with sand, and sand with gravel from surface to approximately 31.5 feet bgs (Appendix C). Laboratory results indicate 22 of 51 soil boring locations contained residual hydrocarbons above the site-specific residual saturation remediation levels for at least one sample-depth interval (Table 1). Soil concentrations exceeding the site-specific residual saturation remediation levels were confined to a north/south trending line of approximately 300 feet along Federal Avenue and extending west towards Possession Sound, approximately 75 feet.

As shown on Cross Section A-A' (Plate 10) as well as the depth-interval map series (Plates 3 through 9), soil samples exceeding the site-specific residual saturation remediation levels (illustrated in red) tend to deepen from the 5-foot bgs range in the southern area to the 15-foot bgs range in the northern area. The depth of first encountered groundwater identified during the drilling activities demonstrates a similar pattern where groundwater was first observed at shallower depths in the 5-foot bgs range to the south and deeper depths in the 15-foot bgs range to the north.

According to historical aerial photography (Wood, 2019), most of the proposed remedial excavation area was infilled during shoreline expansion efforts between 1914 and 1947. The northwestern corner (north of approximately EB25 and east to the N-S cross section line A-A' drawn on Plates 3 through 9) was infilled during shoreline expansion efforts between 1967 and 1976. Select infill materials used in the northwestern corner differ from those in the south.

Cardno observed a concrete debris layer up to 4 feet thick in the northwestern corner in EB32, EB32A, and EB34 along with several gravel layers across the entire area that were not observed in other areas of the proposed remedial excavation. Additionally, the sandy infill material in the northwest corner has a higher average percent gravel component; this coarser-grained material has the potential to permit hydrocarbons to travel deeper in this area than in the mid- to southern portions of the proposed remedial excavation area.

In the southern portion of the proposed remedial excavation area, from approximately EB19 to the southern proposed remedial excavation extent, Cardno observed wood debris in layers up to 4 feet thick. The wood debris was characterized by a clay-like texture and matrix. This finer-grained material has the potential to inhibit the vertical migration of hydrocarbons.

Aside from the presence of coarser-grained gravel and concrete debris material in the north that may have permitted additional vertical migration of hydrocarbons, and the finer-grained wood debris material in the south that may have inhibited vertical migration of hydrocarbons, Cardno did not identify any subsurface preferential pathways. The subsurface is remarkably homogeneous given its infill history, comprising primarily coarse-grained sandy sediments. The vertical extent of residual hydrocarbon concentrations has been defined as illustrated on Plate 10 and Plates 3 through 9.

The lateral migration of hydrocarbons from east to west across the Port of Everett property is well-defined on its western extent along a predominantly straight line running longitudinally north-south from SB3 to EB37. The expression of the straight line, perpendicular to groundwater flow direction and downgradient of the known historical release, demonstrates that migration of hydrocarbons occurred uniformly and the likelihood of preferential pathways existing along any east-west axis across the area is low. The western boundary of the excavation, and the interpreted western extent of residual hydrocarbon concentrations, has been defined as illustrated on Plates 3 through 9.

6 Conclusions

The extents of the proposed Port of Everett remedial excavation have been defined and soil sampling at the time of the excavation will not be necessary.

7 Recommendations

The purpose of the work was to establish the vertical and lateral extents of the proposed remedial excavation such that collection of soil samples at the time of excavation is not necessary. Cardno requests that Ecology confirm whether the excavation extents have been adequately vertically and laterally defined based on comparison against the site-specific residual saturation remediation levels and that soil sampling at the time of excavation will not be necessary.

8 Contact Information

The responsible party contact is Ms. Jennifer Sedlachek, ExxonMobil Environmental and Property Solutions Company, 4096 Piedmont Avenue #194, Oakland, California 94611.

The consultant contact is Mr. Bobby Thompson, Cardno, 801 Second Avenue, Suite 1150, Seattle, Washington 98104.

The agency contact is Mr. Jason Cook, Washington State Department of Ecology, Toxics Cleanup Program, P.O. Box 47600, Olympia, Washington 98504.

9 Limitations

For documents cited that were not generated by Cardno, the data taken from those documents is used "as is" and is assumed to be accurate. Cardno does not guarantee the accuracy of this data and makes no warranties for the referenced work performed nor the inferences or conclusions stated in these documents.

This report and the work performed have been undertaken in good faith, with due diligence and with the expertise, experience, capability and specialized knowledge necessary to perform the work in a good and workmanlike manner and within all accepted standards pertaining to providers of environmental services in Washington at the time of investigation. No soil engineering or geotechnical references are implied or should be inferred. The evaluation of the geologic conditions at the site for this investigation is made from a limited number of data points. Subsurface conditions may vary away from these data points.

10 References

Snohomish County Online Property Information (Snohomish County). January 1, 2018. *Interactive Map (SCOPI)*. https://snohomishcountywa.gov/5414/Interactive-Map-SCOPI. Accessed August 27, 2020.

Cardno. September 1, 2020a. *Excavation Delineation Work Plan – Port of Everett Property*. ExxonMobil ADC, 2717/2713 Federal Avenue, Everett, Washington.

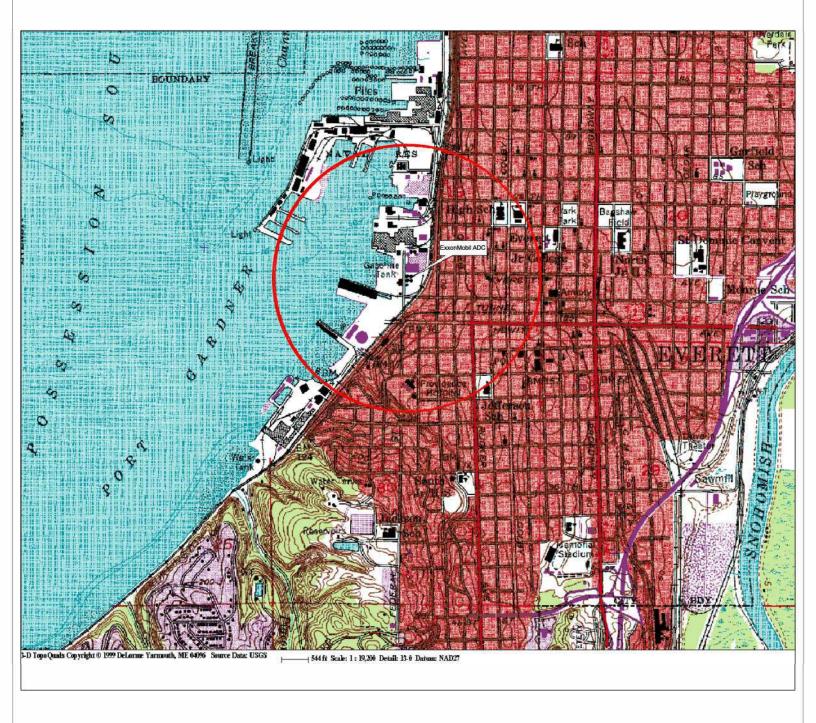
Cardno. December 21, 2020b. Subsequent *Excavation Delineation Drilling Work.* ExxonMobil ADC, 2717/2713 Federal Avenue, Everett, Washington.

Wood Environmental & Infrastructure Solutions, Inc. (Wood). August 23, 2019. draft Site characterization/focused feasibility study report, ExxonMobil/ADC Property, Ecology Site ID 2728, Everett, Washington.

April 21, 2021 Cardno 6

9 Acronym List

μg/L	Micrograms per liter	NAPL	Non-aqueous phase liquid
μg/m³	Micrograms per cubic meter	NEPA	National Environmental Policy Act
μs	Microsiemens	NGVD	National Geodetic Vertical Datum
1,2-DCA	1,2-dichloroethane	NPDES	National Pollutant Discharge Elimination System
acfm	Actual cubic feet per minute	O&M	Operations and Maintenance
AS	Air sparge	ORP	Oxidation-reduction potential
AST	Aboveground storage tank	OSHA	Occupational Safety and Health Administration
bgs	Below ground surface	OVA	Organic vapor analyzer
BTEX	Benzene, toluene, ethylbenzene, and total xylenes	P&ID	Process and Instrumentation Diagram
cfm	Cubic feet per minute	PAH	Polycyclic aromatic (or polyaromatic) hydrocarbon
COC	Chain-of-Custody	PCB	Polychlorinated biphenyl
CPT	Cone Penetration (Penetrometer) Test	PCE	Tetrachloroethene or perchloroethylene
DIPE	Di-isopropyl ether	PID	Photo-ionization detector
DO	Dissolved oxygen	PLC	Programmable logic control
DOT	Department of Transportation	POTW	Publicly-owned treatment works
DPE	Dual-phase extraction	ppmv	Parts per million by volume
DTW	Depth to water	PQL	Practical quantitation limit
EDB	1,2-dibromoethane	psi	Pounds per square inch
EPA	Environmental Protection Agency	PVC	Polyvinyl chloride
ESL	Environmental screening level	QA/QC	Quality assurance/quality control
ETBE	Ethyl tertiary butyl ether	RBSL	Risk-based screening levels
FID	Flame-ionization detector	RCRA	Resource Conservation and Recovery Act
fpm	Feet per minute	RL	Reporting limit
GAC	Granular activated carbon	scfm	Standard cubic feet per minute
gpd	Gallons per day	SSTL	Site-specific target level
gpm	Gallons per minute	STLC	Soluble threshold limit concentration
GWPTS	Groundwater pump and treat system	SVE	Soil vapor extraction
HIT	High-intensity targeted	SVOC	Semi-volatile organic compound
HVOC	Halogenated volatile organic compound	TAME	Tertiary amyl methyl ether
J	Estimated value between MDL and PQL (RL)	TBA	Tertiary butyl alcohol
LEL	Lower explosive limit	TCE	Trichloroethene
LPC	Liquid-phase carbon	TOC	Top of well casing elevation; datum is msl
LRP	Liquid-ring pump	TOG	Total oil and grease
LUFT	Leaking underground fuel tank	TPH	Total petroleum hydrocarbons
LUST	Leaking underground storage tank	TPHd	Total petroleum hydrocarbons as diesel
MCL	Maximum contaminant level	TPHg	Total petroleum hydrocarbons as gasoline
MDL	Method detection limit	TPHmo	Total petroleum hydrocarbons as motor oil
mg/kg	Milligrams per kilogram	TPHs	Total petroleum hydrocarbons as stoddard solvent
mg/L	Milligrams per liter	TRPH	Total recoverable petroleum hydrocarbons
mg/m ³	Milligrams per cubic meter	UCL	Upper confidence level
MPE	Multi-phase extraction	USCS	Unified Soil Classification System
MRL	Method reporting limit	USGS	United States Geologic Survey
msl	Mean sea level	UST	Underground storage tank
MTBE	Methyl tertiary butyl ether	VCP	Voluntary Cleanup Program
MTCA	Model Toxics Control Act	VOC	Volatile organic compound
NAI	Natural attenuation indicators	VPC	Vapor-phase carbon
14/ 11	ratara attoridation indicators	V1 O	vapor priase ourbori



FN 0314470001

EXPLANATION



1/2-mile radius circle



APPROXIMATE SCALE 0.5 1 mile



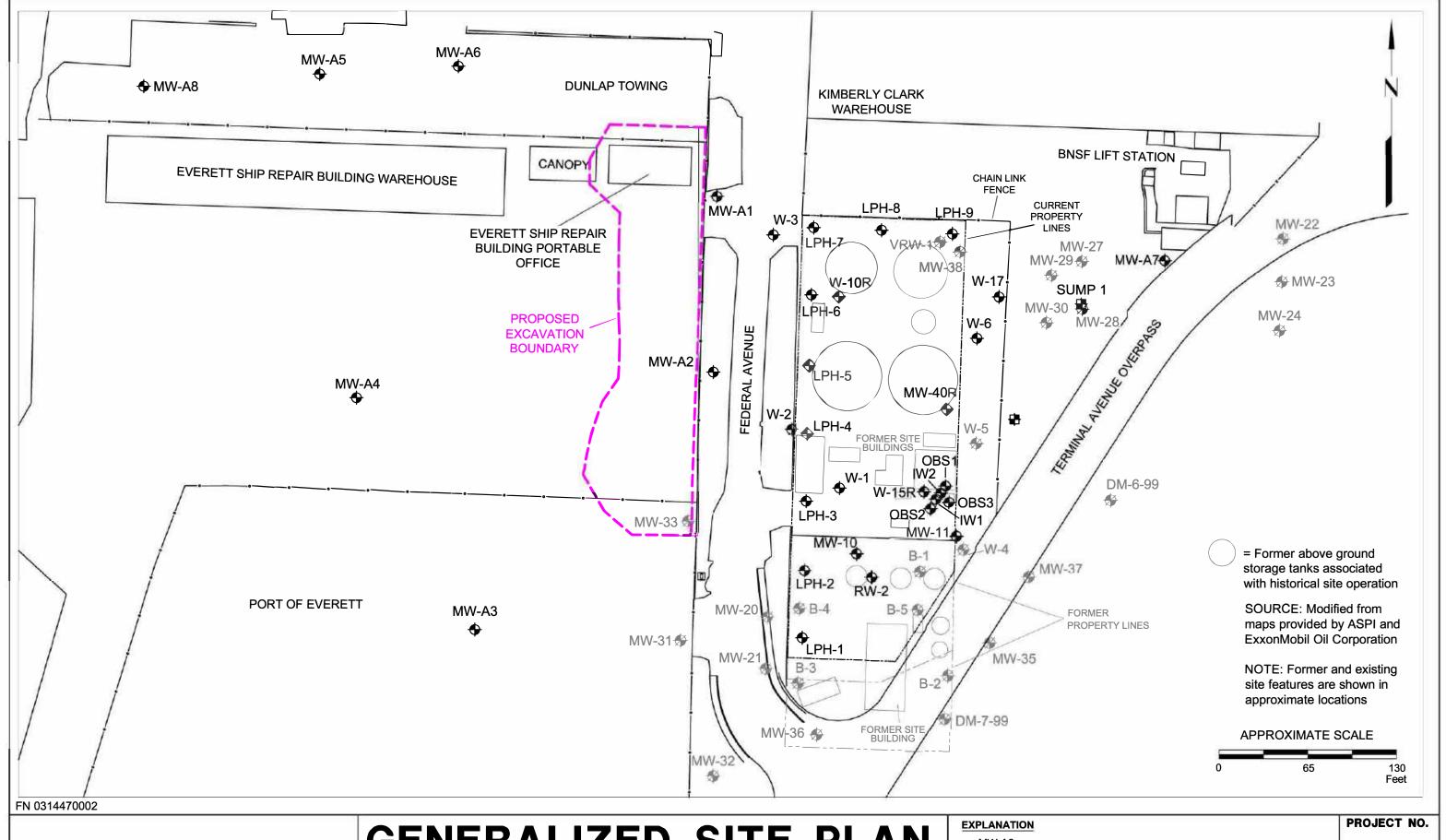
SITE LOCATION MAP

ExxonMobil ADC 2717/2731 Federal Avenue Everett, Washington PROJECT NO.

031447

PLATE 1

CPA: 04/01/21





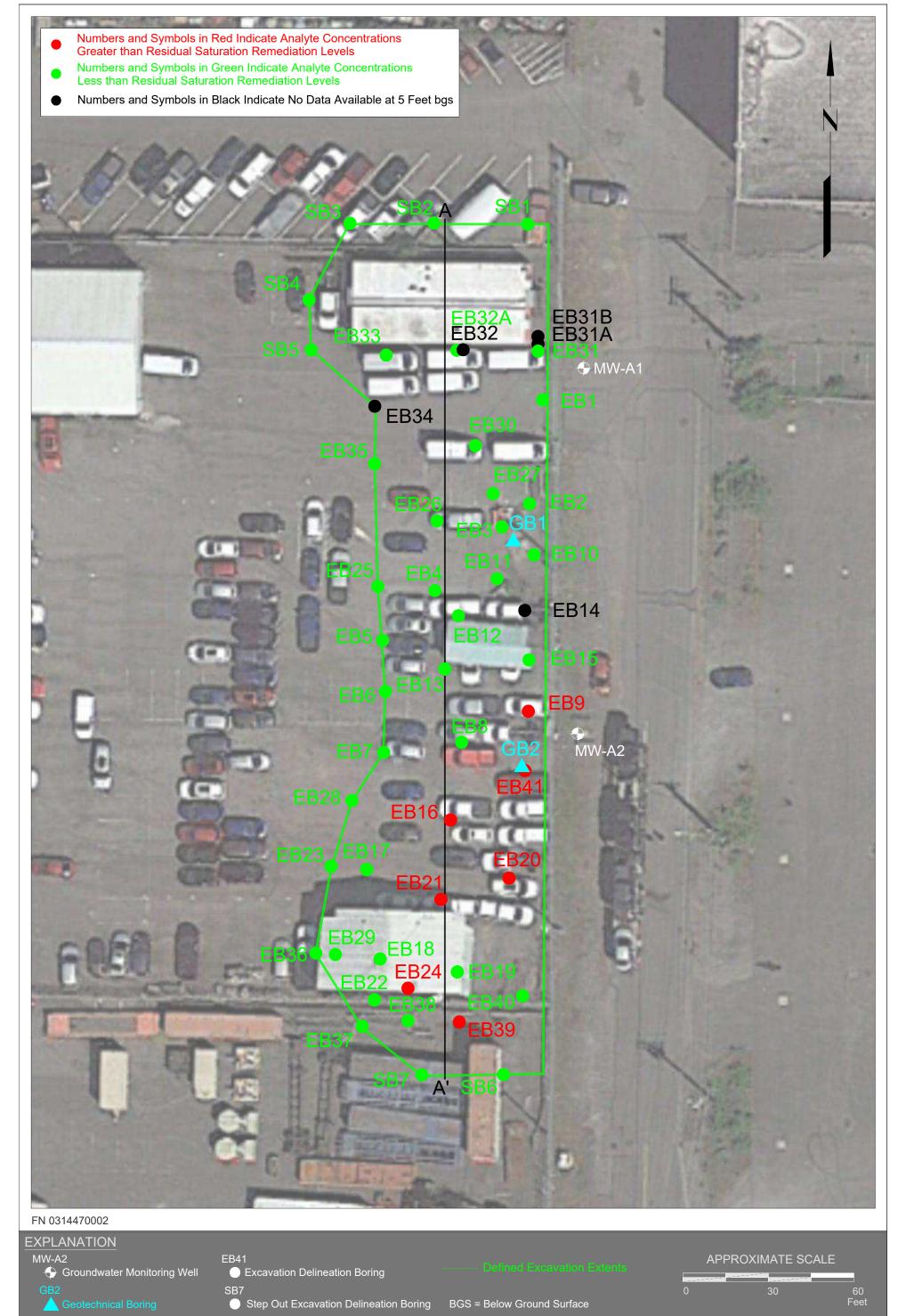
GENERALIZED SITE PLAN

ExxonMobil ADC 2717/2731 Federal Avenue **Everett, Washington**

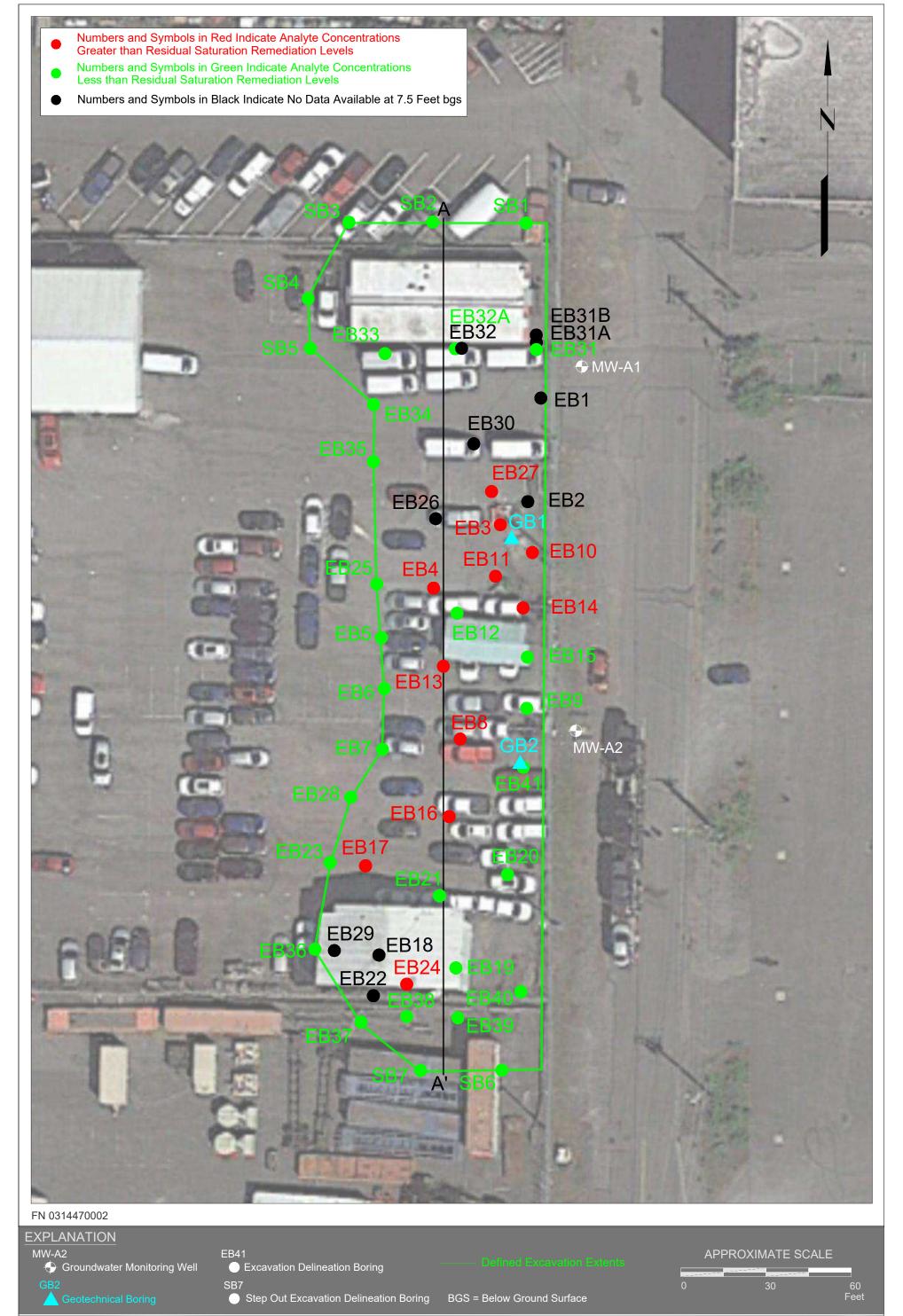
EXPLANATION							
MW-A8	Groundwater Monitoring Well						
SUMP 2	Groundwater Sump						
MW37	Destroyed Groundwater Monitoring Well						

031447

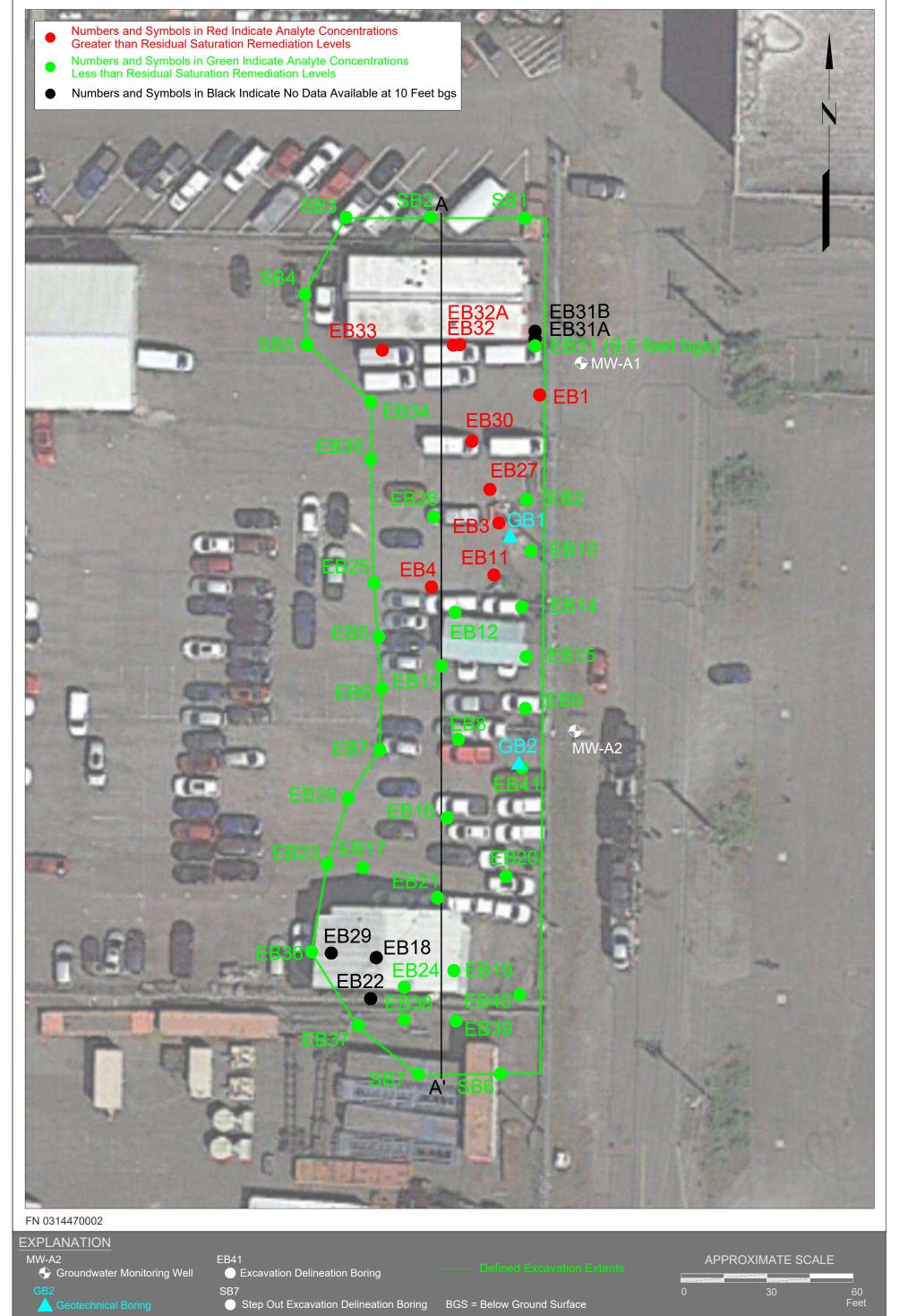
PLATE 2 CPA: 03/30/21



Cardno



Cardno

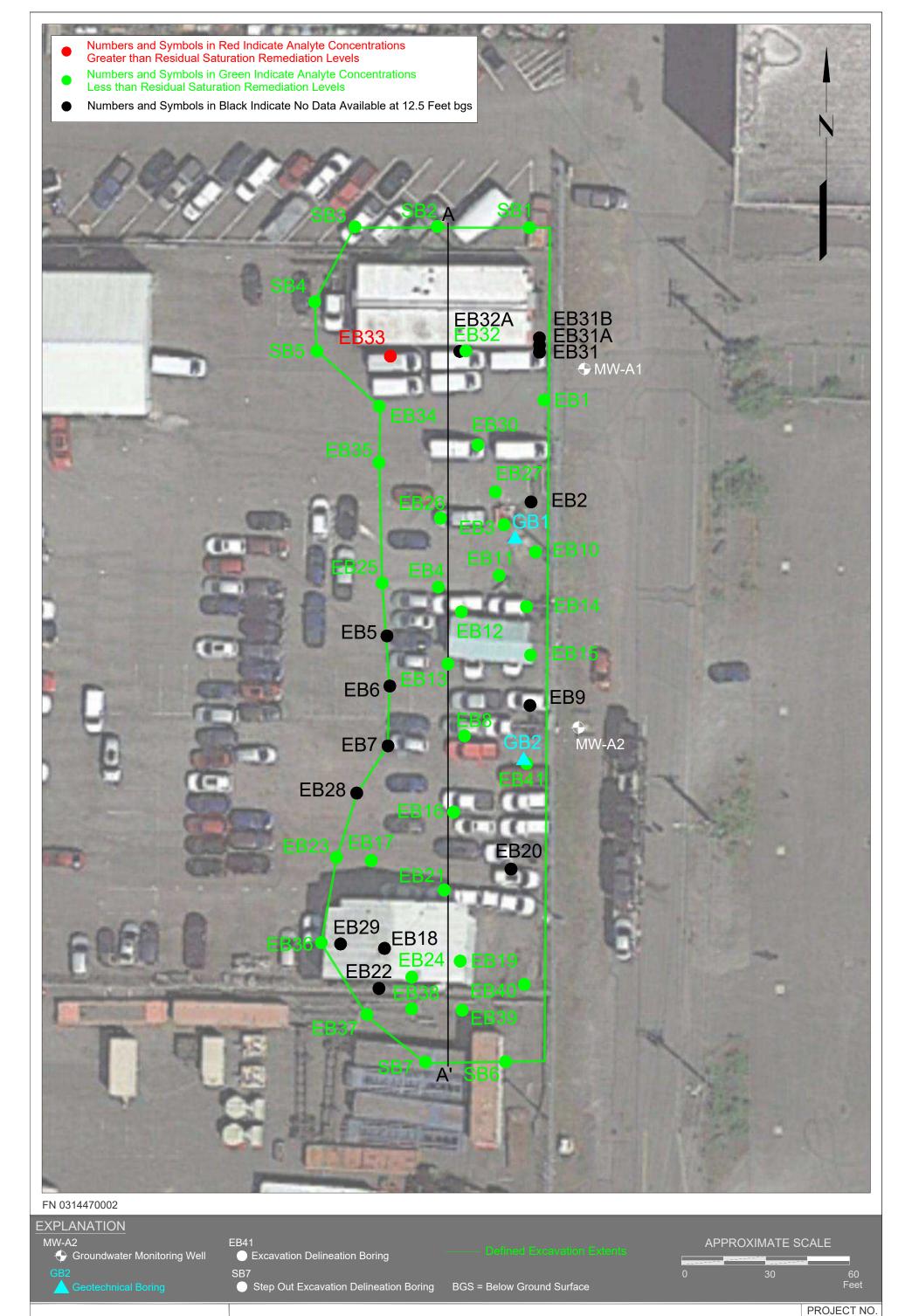


Cardno

PORT OF EVERETT EXCAVATION DELINEATION MAP - 10 FEET BGS

EXXONMOBIL ADC 2717/2731 Federal Avenue Everett, Washington PROJECT NO. 031447

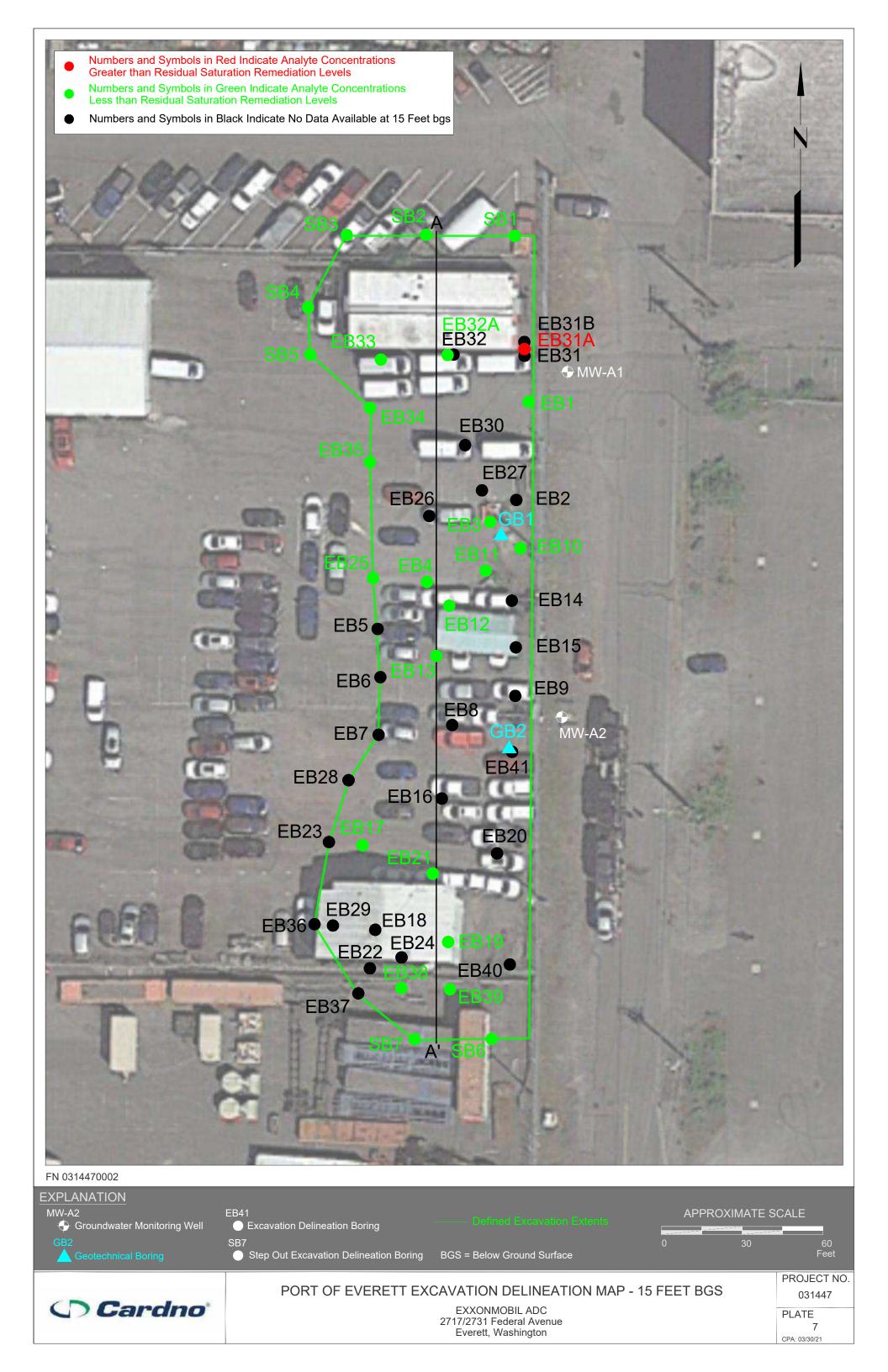
PLATE 5 CPA: 03/30/21



PORT OF EVERETT EXCAVATION DELINEATION MAP - 12.5 FEET BGS

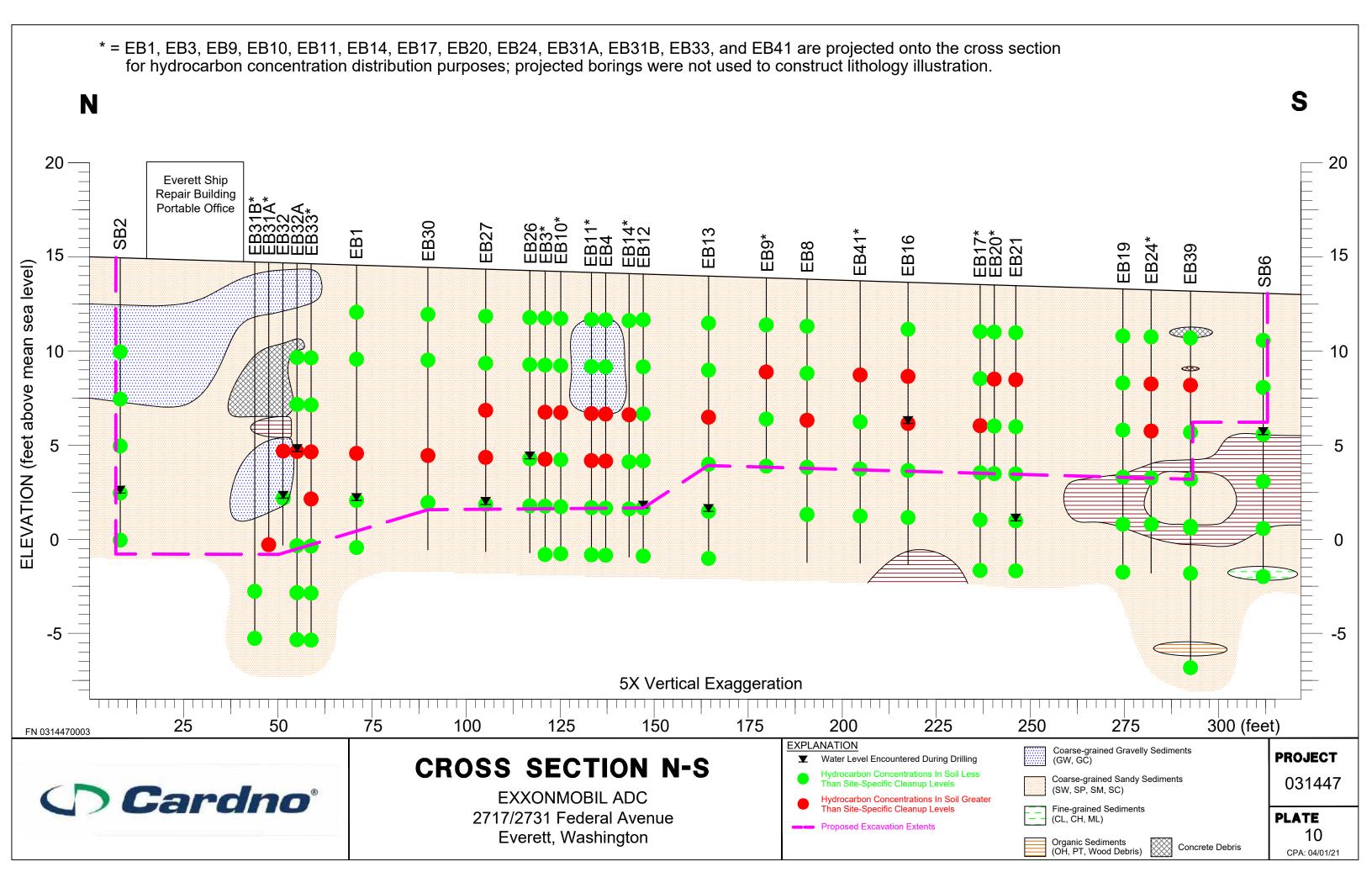
031447 PLATE 6 CPA: 04/01/21

Cardno









ExxonMobil ADC 2717/2731 Federal Avenue Everett, Washington Page 1 of 6

	Well ID /		Sample Depth	TPHg	TPHd	TPHmo
Sample Name	VVeil ID / Location	Date	(feet bgs)	(mg/kg)	(mg/kg)	(mg/kg)
S-2.5-EB1	EB1	10/13/20	2.5	(mg/kg) <10	(Hig/kg) <50	(111g/kg) <250
S-5-EB1	EB1	10/13/20	5	<10	<50	<250 <250
S-10-EB1	EB1	10/13/20	10	<100	16,000E	<250
S-12.5-EB1	EB1	10/13/20	12.5	<50	3,500	<250
S-15-EB1	EB1	10/13/20	15	<10	<50	<250 <250
S-2.5-EB2	EB2	10/13/20	2.5	<10	<50	<250 <250
S-5-EB2	EB2	10/13/20	5	<10	<50 <50	<250 <250
S-10-EB2	EB2	10/13/20	10	<10	<50 <50	<250 <250
S-2.5-EB3	EB3	10/12/20	2.5	<10	<50	<250
S-5-EB3	EB3	10/12/20	5	<10	<50	<250
S-7.5-EB3	EB3	10/12/20	7.5	<100	43,000	<250
S-10-EB3	EB3	10/12/20	10	<50	15,000	<250
S-12.5-EB3	EB3	10/12/20	12.5	<50	188	<250
S-15-EB3	EB3	10/12/20	15	<10	<50	<250
S-2.5-EB4	EB4	10/12/20	2.5	<10	<50	<250
S-5-EB4	EB4	10/12/20	5	18	4,700	<250
S-7.5-EB4	EB4	10/12/20	7.5	<100	36,000	<250
S-10-EB4	EB4	10/12/20	10	<100	5,500E	<250
S-12.5-EB4	EB4	10/12/20	12.5	<50	4,400	<250
S-15-EB4	EB4	10/12/20	15	<10	<50	<250
S-2.5-EB5	EB5	10/12/20	2.5	<10	<50	<250
S-5-EB5	EB5	10/12/20	5	<10	<50	<250
S-7.5-EB5	EB5	10/12/20	7.5	<10	<50	<250
S-10-EB5	EB5	10/12/20	10	<10	51	<250
S-2.5-EB6	EB6	10/12/20	2.5	<10	<50	<250
S-5-EB6	EB6	10/12/20	5	<10	<50	<250
S-7.5-EB6	EB6	10/12/20	7.5	<10	<50	<250
S-10-EB6	EB6	10/12/20	10	<10	<50	<250
S-5-EB7	EB7	10/12/20	5	<10	<50	<250
S-7.5-EB7	EB7	10/12/20	7.5	<10	74	<250
S-10-EB7	EB7	10/12/20	10	<10	<50	<250
S-2.5-EB8	EB8	10/14/20	2.5	<10	<50	<250
S-5-EB8	EB8	10/14/20	5	<10	2,600	4,300
S-7.5-EB8	EB8	10/14/20	7.5	<10	7,400	13,000
S-10-EB8	EB8	10/14/20	10	<20	1,800	1,300
S-12.5-EB8	EB8	10/14/20	12.5	<10	<50	<250
S-2.5-EB9	EB9	10/14/20	2.5	<10	<50	<250
S-5-EB9	EB9	10/14/20	5	<50	2,700	11,000E
S-7.5-EB9	EB9	10/14/20	7.5	<10	<50	<250
S-10-EB9	EB9	10/14/20	10	<10	<50	<250
S-2.5-EB10	EB10	10/14/20	2.5	<10	<50	<250
S-5-EB10	EB10	10/14/20	5	<10	<50 <50	<250 <250
S-7.5-EB10	EB10	10/14/20	7.5	<10	12,000	<250
S-10-EB10	EB10	10/14/20	10	<10	4,300	<250
S-12.5-EB10	EB10	10/14/20	12.5	<10	<50	<250
S-15-EB10	EB10	10/14/20	15	<10	<50	<250
te-Specific Cleanu	p Levels			2,470	4,800	5,810

ExxonMobil ADC 2717/2731 Federal Avenue Everett, Washington Page 2 of 6

	Well ID /		Sample Depth	TPHg	TPHd	TPHmo
Sample Name	Location	Date	(feet bgs)	(mg/kg)	(mg/kg)	(mg/kg)
S-2.5-EB11	EB11	10/12/20	2.5	<10	<50	550
S-5-EB11	EB11	10/12/20	5	<100	2,400	<250
S-7.5-EB11	EB11	10/12/20	7.5	<100	44,000	2,700
S-10-EB11	EB11	10/12/20	10	<100	11,000	1,300
S-12.5-EB11	EB11	10/12/20	12.5	<10	370	<250
S-15-EB11	EB11	10/12/20	15	<10	<50	<250
S-2.5-EB12	EB12	10/12/20	2.5	<10	<50	<250
S-5-EB12	EB12	10/12/20	5	<10	160	<250
S-7.5-EB12	EB12	10/12/20	7.5	<10	3,600	<250
S-10-EB12	EB12	10/12/20	10	<100	3,000	<250
S-12.5-EB12	EB12	10/12/20	12.5	<100	2,000	<250
S-15-EB12	EB12	10/12/20	15	<10	460	<250
S-2.5-EB13	EB13	10/14/20	2.5	<10	<50	<250 <250
S-5-EB13	EB13	10/14/20	5	<50	1,400	1,800
S-7.5-EB13	EB13	10/14/20	7.5	190	11,000	1,800
S-10-EB13	EB13	10/14/20	10	<10	320	<250
S-10-EB13 S-12.5-EB13					<50	
	EB13	10/14/20	12.5	<10		<250
S-15-EB13	EB13	10/14/20	15	<10	<50	<250
S-2.5-EB14	EB14	10/14/20	2.5	<10	<50	<250
S-7.5-EB14	EB14	10/14/20	7.5	<10	5,000	6,900
S-10-EB14	EB14	10/14/20	10	<10	4,100	1,500
S-12.5-EB14	EB14	10/14/20	12.5	<10	<50	<250
S-2.5-EB15	EB15	10/14/20	2.5	<10	<50	<250
S-5-EB15	EB15	10/14/20	5	<10	1,100	2,000
S-7.5-EB15	EB15	10/14/20	7.5	19	2,200	260
S-10-EB15	EB15	10/14/20	10	<10	<50	<250
S-12.5-EB15	EB15	10/14/20	12.5	<10	<50	<250
S-2.5-EB16	EB16	10/13/20	2.5	<10	<50	<250
S-5-EB16	EB16	10/13/20	5	<100	4,800	1,100
S-7.5-EB16	EB16	10/13/20	7.5	<100	9,700	3,900
S-10-EB16	EB16	10/13/20	10	<10	170	<250
S-12.5-EB16	EB16	10/13/20	12.5	<10	<50	<250
S-2.5-EB17	EB17	10/13/20	2.5	<10	<50	<250
S-5-EB17	EB17	10/13/20	5	<10	<50	<250
S-7.5-EB17	EB17	10/13/20	7.5	11	33,000	<250
S-10-EB17	EB17	10/13/20	10	<50	2,600	<250
S-12.5-EB17	EB17	10/13/20	12.5	<10	<50	<250
S-15-EB17	EB17	10/13/20	15	<10	<50	<250
S-5-EB18	EB18	10/13/20	5	<10	450	210J
S-2.5-EB19	EB19	10/13/20	2.5	<10	<50	<250
S-5-EB19	EB19	10/13/20	5	<50	1,900	360
S-7.5-EB19	EB19	10/13/20	7.5	<50	4,500	760
S-10-EB19	EB19	10/13/20	10	<10	<50	<250
S-12.5-EB19	EB19	10/13/20	12.5	<10	<50	<250
S-15-EB19	EB19	10/13/20	15	<10	<50	<250 <250
S-2.5-EB20	EB20	10/13/20	2.5	<10	170	<250 <250
ite-Specific Cleanu		10/10/20	۷.5	2,470	4,800	5,810

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Sample Name	Well ID /	Date	Sample Depth	TPHg	TPHd	TPHmo
Oampie Name	Location	Date	(feet bgs)	(mg/kg)	(mg/kg)	(mg/kg)
S-5-EB20	EB20	10/13/20	5	<10	8,400	2,200
S-7.5-EB20	EB20	10/13/20	7.5	<10	180	<250
S-10-EB20	EB20	10/13/20	10	<10	<50	<250
S-2.5-EB21	EB21	10/13/20	2.5	<10	<50	<250
S-5-EB21	EB21	10/13/20	5	<10	8,100	12,000
S-7.5-EB21	EB21	10/13/20	7.5	<50	3,700	640
S-10-EB21	EB21	10/13/20	10	<10	<50	<250
S-12.5-EB21	EB21	10/13/20	12.5	<10	<50	<250
S-15-EB21	EB21	10/13/20	15	<10	<50	<250
S-5-EB22	EB22	10/13/20	5	<10	<50	<250
S-2.5-EB23	EB23	10/13/20	2.5	<10	<50	<250
S-5-EB23	EB23	10/13/20	5	<10	<50	<250
S-7.5-EB23	EB23	10/13/20	7.5	<10	<50	<250
S-10-EB23	EB23	10/13/20	10	<10	4,100	<250
S-12.5-EB23	EB23	10/13/20	12.5	<10	62	<250
S-2.5-EB24	EB24	10/13/20	2.5	<10	<50	<250
S-5-EB24	EB24	10/13/20	5	<50	<50 <50	6,300
S-7.5-EB24	EB24	10/13/20	7.5	<10	8,100	1,200
S-10-EB24	EB24	10/13/20	10	<10	2,300	<250
S-12.5-EB24	EB24	10/13/20	12.5	<10	<50	<250
S-2.5-EB25	EB25	10/13/20	2.5	<10	<50	<250
S-5-EB25	EB25	10/13/20	5	<10	<50	<250
S-7.5-EB25	EB25	10/13/20	7.5	<10	<50	<250
S-10-EB25	EB25	10/13/20	10	<10	2,400	860
S-12.5-EB25	EB25	10/13/20	12.5	<10	<50	<250
S-15-EB25	EB25	10/13/20	15		<50	<250
S-2.5-EB26	EB26	10/14/20	2.5	<10	<50	<250
S-5-EB26	EB26	10/14/20	5	<10	76	<250
S-10-EB26	EB26	10/14/20	10	<20	1,600	<250
S-12.5-EB26	EB26	10/14/20	12.5	<10	<50	<250
S-2.5-EB27	EB27	10/14/20	2.5	<10	<50	<250
S-5-EB27	EB27	10/14/20	5	<10	<50	<250
S-7.5-EB27	EB27	10/14/20	7.5	<100	10,000	11,000
S-10-EB27	EB27	10/14/20	10	<100	9,100E	<250
S-12.5-EB27	EB27	10/14/20	12.5	<10	<50	<250
S-2.5-EB28	EB28	10/14/20	2.5	<10	<50	<250
S-5-EB28	EB28	10/14/20	5	<10	<50	<250
S-7.5-EB28	EB28	10/14/20	7.5	<10	<50	<250
S-10-EB28	EB28	10/14/20	10	<50	<50	<250
S-2.5-EB29	EB29	10/14/20	2.5	<10	<50	<250
S-5-EB29	EB29	10/14/20	5	<10	<50	<250
S-2.5-EB30	EB30	10/14/20	2.5	<10	<50	<250
S-5-EB30	EB30	10/14/20	5	<10	<50	560
S-10-EB30	EB30	10/14/20	10	<100	39,000	<250
S-12.5-EB30	EB30	10/14/20	12.5	<10	<50	<250
S-5-EB31	EB31	01/25/21	5	<10	<50	<250
e-Specific Cleanu		0 ., 20, 2 1	~	2,470	4,800	5,810

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Sample Name	Well ID /	Date	Sample Depth	TPHg	TPHd	TPHmo
·	Location		(feet bgs)	(mg/kg)	(mg/kg)	(mg/kg)
S-7.5-EB31	EB31	01/25/21	7.5	<10	<50	<250
S-9.5-EB31	EB31	01/25/21	9.5	<100	3,400	<250
S-15-EB31A	EB31A	01/27/21	15	<100	7,000E	<250
S-17.5-EB31B	EB31B	01/27/21	17.5	<10	<50	<250
S-20-EB31B	EB31B	01/27/21	20	<10	<50	<250
S-10-EB32	EB32	01/25/21	10	<10	6,200	<250
S-10-EB32 ^b	EB32	01/25/21	10		4,700	<250
S-12.5-EB32	EB32	01/25/21	12.5	<10	410	<250
S-12.5-EB32 ^b	EB32	01/25/21	12.5		340	<250
S-5-EB32A	EB32A	01/27/21	5	<10	56	<250
S-7.5-EB32A	EB32A	01/27/21	7.5	<25	2,040	290
S-10-EB32A	EB32A	01/27/21	10	<10	6,100	<250
S-15-EB32A	EB32A	01/27/21	15	<10	<50	<250
S-17.5-EB32A	EB32A	01/27/21	17.5	<10	<50	<250
S-20-EB32A	EB32A	01/27/21	20	<10	<50	<250
S-5-EB33	EB33	01/25/21	5	<10	<50	<250
S-7.5-EB33	EB33	01/25/21	7.5	<10	<50	<250
S-10-EB33	EB33	01/25/21	10	<40	28,000	1,580
S-12.5-EB33	EB33	01/25/21	12.5	<10	21,000E	<250
S-15-EB33	EB33	01/25/21	15	<1,000	150	<250
S-17.5-EB33	EB33	01/25/21	17.5	<10	63	<250
S-20-EB33	EB33	01/25/21	20	<10	<50	310
S-7.5-EB34	EB34	01/25/21	7.5	<10	<50	<250
S-10-EB34	EB34	01/25/21	10	<10	2,100	<250
S-12.5-EB34	EB34	01/25/21	12.5	<50	1,600	760
S-15-EB34	EB34	01/25/21	15	<10	<50	<250
S-17.5-EB34	EB34	01/25/21	17.5	<10	<50	<250
S-20-EB34	EB34	01/25/21	20	<10	<50	<250
S-5-EB35	EB35	01/25/21	5	<10	<50	<250
S-7.5-EB35	EB35	01/25/21	7.5	<10	<50	<250
S-10-EB35	EB35	01/25/21	10	<10	<50	<250
S-12.5-EB35	EB35	01/25/21	12.5	<15	520	430
S-15-EB35	EB35	01/25/21	15	<10	<50	<250
S-5-EB36	EB36	01/26/21	5	<10	<50	<250
S-7.5-EB36	EB36	01/26/21	7.5	<10	<50	<250
S-10-EB36	EB36	01/26/21	10	<10	<50	<250
S-12.5-EB36	EB36	01/26/21	12.5	<10	<50	<250
S-5-EB37	EB37	01/27/21	5	<10	<50	<250
S-7.5-EB37	EB37	01/27/21	7.5	<10	<50	<250
S-10-EB37	EB37	01/27/21	10	<10	<50	<250
S-12.5-EB37	EB37	01/27/21	12.5	<10	<50	<250
S-2.5-EB38	EB38	01/27/21	2.5	<10	<50	490
S-5-EB38	EB38	01/27/21	5	<10	<50	<250
S-7.5-EB38	EB38	01/27/21	7.5	<10	<50 <50	<250 <250
S-10-EB38	EB38	01/27/21	10	<10	<50 <50	<250 <250
S-10-EB38	EB38	01/27/21	12.5	<10	<50	<250 <250
	p Levels	UIIZIIZI	14.0	2,470	4,800	5,810

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Sample Name	Well ID / Location	Date	Sample Depth	TPHg	TPHd	TPHmo
S-15-EB38	EB38	01/27/21	(feet bgs)	(mg/kg) <10	(mg/kg) <50	(mg/kg) <250
S-2.5-EB39	EB39	01/27/21	2.5	<10	2,200	<250
S-2.5-EB39 ^b	EB39	01/27/21	2.5	<10		
S-5-EB39	EB39	01/27/21	5	<10	5,600	<250
S-5-EB39 ^b	EB39	01/27/21	5		4,500	<250
S-7.5-EB39	EB39	01/27/21	7.5	<50	2,200	<250
S-10-EB39	EB39	01/27/21	10	<10	<50	<250
S-12.5-EB39	EB39	01/27/21	12.5	<10	<50	<250
S-15-EB39	EB39	01/27/21	15	<10	<50	<250
S-20-EB39	EB39	01/27/21	20	<10	<50	<250
S-5-EB40	EB40	01/26/21	5	<10	490 ^a	<250
S-7.5-EB40	EB40	01/26/21	7.5	<10	<50	<250
S-10-EB40	EB40	01/26/21	10	<10	<50	<250
S-12.5-EB40	EB40	01/26/21	12.5	<10	<50	<250
S-5-EB41	EB41	01/27/21	5	<15	9,300	6,700
S-7.5-EB41	EB41	01/27/21	7.5	<10	630	310
S-10-EB41	EB41	01/27/21	10	<10	<50	<250
S-12.5-EB41	EB41	01/27/21	12.5	<10	<50	<250
S-5-SB1	SB1	01/26/21	5	<10	<50	<250
S-7.5-SB1	SB1	01/26/21	7.5	<10	110	660
S-10-SB1	SB1	01/26/21	10	<10	<50	<250
S-12.5-SB1	SB1	01/26/21	12.5	<10	<50	<250
S-15-SB1	SB1	01/26/21	15	<10	<50	<250
		01/26/21		<10		
S-5-SB2	SB2		5		<50	790
S-7.5-SB2	SB2	01/26/21	7.5	<10	<50	<250
S-10-SB2	SB2	01/26/21	10	<10	<50	<250
S-12.5-SB2	SB2	01/26/21	12.5	<10	<50	<250
S-15-SB2	SB2	01/26/21	15	<10	<50	<250
S-5-SB3	SB3	01/26/21	5	<10	440	2,200
S-7.5-SB3	SB3	01/26/21	7.5	<10	<50	<250
S-10-SB3	SB3	01/26/21	10	<10	130	680
S-12.5-SB3	SB3	01/26/21	12.5	<10	<50	<250
S-15-SB3	SB3	01/26/21	15	<10	<50	<250
S-20-SB3	SB3	01/26/21	20	<10	<50	<250
S-5-SB4	SB4	01/25/21	5	<10	<50	<250
S-7.5-SB4	SB4	01/25/21	7.5	<10	<50	<250
S-10-SB4	SB4	01/25/21	10	<10	3,900	<250
S-12.5-SB4	SB4	01/25/21	12.5	<50	1,700	<250
S-15-SB4	SB4	01/25/21	15	<10	56	<250
S-17.5-SB4	SB4	01/25/21	17.5	<10	<50	<250
S-20-SB4	SB4	01/25/21	20	<20	610	<250
S-5-SB5	SB5	01/26/21	5	<10	<50	1,630
S-7.5-SB5	SB5	01/26/21	7.5	<10	<50	<250
S-10-SB5	SB5	01/26/21	10	<10	<50	760
S-12.5-SB5	SB5	01/26/21	12.5	<10	<50	<250
S-15-SB5	SB5	01/26/21	15	<10	82	580
S-17.5-SB5	SB5	01/26/21	17.5	<10	<50	<250
te-Specific Cleanu	p I evels			2,470	4,800	5,810

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Sample Name	Well ID /	Date	Sample Depth	TPHg	TPHd	TPHmo
Sample Name	Location	Date	(feet bgs)	(mg/kg)	(mg/kg)	(mg/kg)
S-20-SB5	SB5	01/26/21	20	<10	<50	<250
S-2.5-SB6	SB6	02/05/21	2.5	<10	2,800	<250
S-5-SB6	SB6	02/05/21	5	<10	57	<250
S-7.5-SB6	SB6	02/05/21	7.5	<10	<50	<250
S-10-SB6	SB6	02/05/21	10	<10	<50	<250
S-12.5-SB6	SB6	02/05/21	12.5	<10	<50	<250
S-15-SB6	SB6	02/05/21	15	<10	<50	<250
S-5-SB7	SB7	02/05/21	5	<10	<50	<250
S-7.5-SB7	SB7	02/05/21	7.5	<10	<50	<250
S-10-SB7	SB7	02/05/21	10	<10	<50	<250
S-12.5-SB7	SB7	02/05/21	12.5	<10	<50	<250
S-15-SB7	SB7	02/05/21	15	<10	<50	<250
Site-Specific Cleanu	p Levels		2,470	4,800	5,810	

EXPLANATION:

feet bgs = Feet below ground surface

mg/kg = Milligrams per kilogram

TPHg = Total Petroleum Hydrocarbons as Gasoline in accordance with Ecology Method NWTPH-Gx

TPHd, TPHmo = Total Petroleum Hydrocarbons as Diesel and as Oil, respectively, in accordance with Ecology Method NWTPH-Dx

- < = Less than the stated laboratory reporting limit
- -- = Not Analyzed

All samples run with silica gel cleanup

Shaded values equal or exceed Site-Specific Cleanup Levels

- a = Indicates light diesel range
- b = Sample reanalyzed by laboratory
- E = Reported result exceeds the calibration range and is an estimate
- J = Indicates analyte was positively identified. Reported result is an estimate.

ExxonMobil ADC Cardno 03144702.R04

APPENDIX A FIELD PROTOCOL

Cardno Soil Boring and Well Installation Field Protocol

Preliminary Activities

Prior to the onset of field activities at the site, Cardno obtains the appropriate permit(s) from the governing agency(s). Advance notification is made as required by the agency(s) prior to the start of work. Cardno marks the borehole locations and contacts the local one call utility locating service at least 48 hours prior to the start of work to mark buried utilities. Borehole locations may also be checked for buried utilities by a private geophysical surveyor. Prior to drilling, the borehole location is cleared in accordance with the client's procedures. Fieldwork is conducted under the advisement of a registered professional geologist and in accordance with an updated site-specific safety plan prepared for the project, which is available at the job site during field activities.

Drilling and Soil Sampling Procedures

Cardno contracts a licensed driller to advance the boring and collect soil samples. The specific drilling method (e.g., hollow-stem auger, direct push method, or sonic drilling), sampling method [e.g., core barrel or California-modified split spoon sampler (CMSSS)] and sampling depths are documented on the boring log and may be specified in a work plan. Soil samples are typically collected at the capillary fringe and at 5-foot intervals to the total depth of the boring. To determine the depth of the capillary fringe prior to drilling, the static groundwater level is measured with a water level indicator in the closest monitoring well to the boring location, if available.

The borehole is advanced to just above the desired sampling depth. For CMSSSs, the sampler is placed inside the auger and driven to a depth of 18 inches past the bit of the auger. The sampler is driven into the soil with a standard 140-pound hammer repeatedly dropped from a height of 30 inches onto the sampler. The number of blows required to drive the sampler each 6-inch increment is recorded on the boring log. For core samplers (e.g., direct push), the core is driven 18 inches using the rig apparatus.

Soil samples are preserved in the metal or plastic sleeve used with the CMSSS or core sampler, in glass jars or other manner required by the local regulatory agency (e.g., Environmental Protection Agency Method 5035). Sleeves are removed from the sample barrel, and the lowermost sample sleeve is immediately sealed with TeflonTM tape, capped and labeled. Samples are placed in a cooler chilled to 4° Celsius and transported to a state-certified laboratory. The samples are transferred under chain-of-custody (COC) protocol.

Field Screening Procedures

Cardno places the soil from the middle of the sampling interval into a plastic re-sealable bag. The bag is placed away from direct sunlight for approximately 20 minutes, after which the tip of a photo-ionization detector (PID) or similar device is inserted through the plastic bag to measure organic vapor concentrations in the headspace. The PID measurement is recorded on the boring log. At a minimum, the PID or other device is calibrated on a daily basis in accordance with manufacturer's specifications using a hexane or isobutylene standard. The calibration gas and concentration are recorded on a calibration log. Instruments such as the PID are useful for evaluating relative concentrations of volatilized hydrocarbons, but they do not measure the concentration of petroleum hydrocarbons in the soil matrix with the same precision as laboratory analysis. Cardno trained personnel describe the soil in the bag according to the Unified Soil Classification System and record the description on the boring log, which is included in the final report.

Air Monitoring Procedures

Cardno performs a field evaluation for volatile hydrocarbon concentrations in the breathing zone using a calibrated PID or lower explosive level meter.

Groundwater Sampling

A groundwater sample, if desired, is collected from the boring by using HydropunchTM sampling technology or installing a well in the borehole. In the case of using HydropunchTM technology, after collecting the capillary fringe soil sample, the boring is advanced to the top of the soil/groundwater interface and a sampling probe is pushed to approximately 2 feet below the top of the static water level. The probe is opened by partially withdrawing it and thereby exposing the screen. A new or decontaminated bailer is used to collect a water sample from the probe. The water sample is then emptied into laboratory-supplied containers constructed of the correct material and with the correct volume and preservative to comply with the proposed laboratory test. The container is slowly filled with the retrieved water sample until no headspace remains and then promptly sealed with a Teflon-lined cap, checked for the presence of bubbles, labeled, entered onto a COC record and placed in chilled storage at 4° Celsius. Laboratory-supplied trip blanks accompany the water samples as a quality assurance/quality control procedure. Equipment blanks may be collected as required. The samples are kept in chilled storage and transported under COC protocol to a client-approved, state-certified laboratory for analysis.

Backfilling of Soil Boring

If a well is not installed, the boring is backfilled from total depth to approximately 5 feet below ground surface (bgs) with either neat cement or bentonite grout using a tremie pipe. The boring is backfilled from 5 feet bgs to approximately 1 foot bgs with hydrated bentonite chips. The borehole is completed from 1 foot bgs to surface grade with material that best matches existing surface conditions and meets local agency requirements. Site-specific backfilling details are shown on the respective boring log.

Well Construction

A well (if constructed) is completed using materials documented on the boring log or specified in a work plan. The well is constructed with slotted casing across the desired groundwater sampling depth(s) and completed with blank casing to within 6 inches of surface grade. No further construction is conducted on temporary wells. For permanent wells, the annular space of the well is backfilled with Monterey sand from the total depth to approximately 2 feet above the top of the screened casing. A hydrated granular bentonite seal is placed on top of the sand filter pack. Grout may be placed on top of the bentonite seal to the desired depth using a tremie pipe. The well may be completed to surface grade with a 1-foot thick concrete pad. A traffic-rated well vault and locking cap for the well casing may be installed to protect against surfacewater infiltration and unauthorized entry. Site-specific well construction details including type of well, well depth, casing diameter, slot size, length of screen interval and sand size are documented on the boring log or specified in the work plan.

Well Development and Sampling

If a permanent groundwater monitoring well is installed, the grout is allowed to cure a minimum of 48 hours before development. Cardno personnel or a contracted driller use a submersible pump or surge block to develop the newly installed well. Prior to development, the pump is decontaminated by allowing it to run and re-circulate while immersed in a non-phosphate solution followed by successive immersions in potable water and de-ionized water baths. The well is developed until sufficient well casing volumes are removed so that turbidity is within allowable limits and pH, conductivity and temperature levels stabilize in the purge water. The volume of groundwater extracted is recorded on a log.

Following development, groundwater within the well is allowed to recharge until at least 80% of the drawdown is recovered. A new or decontaminated bailer is slowly lowered past the air/water interface in the well, and a water sample is collected and checked for the presence of non-aqueous phase liquid, sheen or emulsions. The water sample is then emptied into laboratory-supplied containers as discussed above.

Surveying

If required, wells are surveyed by a licensed land surveyor relative to an established benchmark of known elevation above mean sea level to an accuracy of +/- 0.01 foot. The casing is notched or marked on one side to identify a consistent surveying and measuring point.

Decontamination Procedures

Cardno or the contracted driller decontaminates soil and water sampling equipment between each sampling event with a non-phosphate solution, followed by a minimum of two tap water rinses. De-ionized water may be used for the final rinse. Downhole drilling equipment is steam-cleaned prior to drilling the borehole and at completion of the borehole.

Waste Treatment and Soil Disposal

Soil cuttings generated from the drilling or sampling are stored on site in labeled, Department of Transportation-approved, 55-gallon drums or other appropriate storage container. The soil is removed from the site and transported under manifest to a client- and regulatory-approved facility for recycling or disposal. Decontamination fluids and purge water from well development and sampling activities, if conducted, are stored on site in labeled, regulatory-approved storage containers. Fluids are subsequently transported under manifest to a client- and regulatory-approved facility for disposal or treated with a permitted mobile or fixed-base carbon treatment system.

ExxonMobil ADC Cardno 03144702.R04

APPENDIX B LABORATORY ANALYTICAL RESULTS

ExxonMobil ADC Cardno 03144702.R04

APPENDIX C USCS & BORING LOGS

UNIFIED SOIL CLASSIFICATION SYSTEM KEY

MAJOR DI	MAJOR DIVISIONS		DESCRIPTION	MAJOR DIVISIONS		LTR	DESCRIPTION
		GW	Well-graded gravels or gravel sand mixtures, little or no fines			ML	Inorganic silts and very fine- grained sands, rock flour, silty
	GRAVEL AND	GP	Poorly-graded gravels or gravel sand mixture, little or no fines		SILTS AND CLAYS LL<50		or clayey fine sands or clayey silts with slight plasticity
	GRAVELLY SOILS	GM	Silty gravels, gravel-sand-clay mixtures			CL	Inorganic clays of low to medium plasticity, gravelly clays, sandy clays, silty clays, lean clays
COARSE		GC	Clayey gravels, gravel-sand-clay mixtures	FINE		OL	Organic silts and organic silt- clays of low plasticity
GRAINED SOILS		SW	Well-graded sands or gravelly sands, little or no fines	GRAINED SOILS	SILTS AND CLAYS	МН	Inorganic silts, micaceous or diatomaceous fine-grained sandy or silty soils, elastic silts
	SAND AND	SP	Poorly-graded sands or gravelly sands, little or no fines			СН	Inorganic clays of high plasticity, fat clays
	SANDY SOILS	SM	Silty sands, sand-silt mixtures		LL>50	ОН	Organic clays of medium to high plasticity
		SC	Clayey sands, sand-clay mixtures	HIGHLY ORGANIC SOILS		Pt	Peat and other highly organic soils

BLOW COUNTS REPRESENT THE NUMBER OF BLOWS OF A 140- OR 300-POUND HAMMER FALLING 30 INCHES TO DRIVE THE SAMPLER THROUGH EACH 6 INCHES OF PENETRATION.

FN:QuiklogUSCS.dwg

DASHED LINES SEPARATING UNITS ON THE LOG REPRESENT APPROXIMATE BOUNDARIES ONLY. ACTUAL BOUNDARIES MAY BE GRADUAL. LOGS REPRESENT SUBSURFACE CONDITIONS AT THE BORING LOCATION AT THE TIME OF DRILLING ONLY.



UNIFIED SOIL CLASSIFICATION SYSTEM AND LOG OF BORINGS SYMBOL KEY



BORING LOG EB1

(Page 1 of 1)

Date Drilled: : 10/13/20

Drilling Co.: : Holocene Drilling, Inc. Drilling Method: : Push Probe

Sampling Method: : Dual Tube Borehole Diameter: : 3" Casing Diameter: : N/A Latitude : N/A Longitude : N/A Total Depth: : 15' bgs

Logged By: : Brett McLees

Project No.:

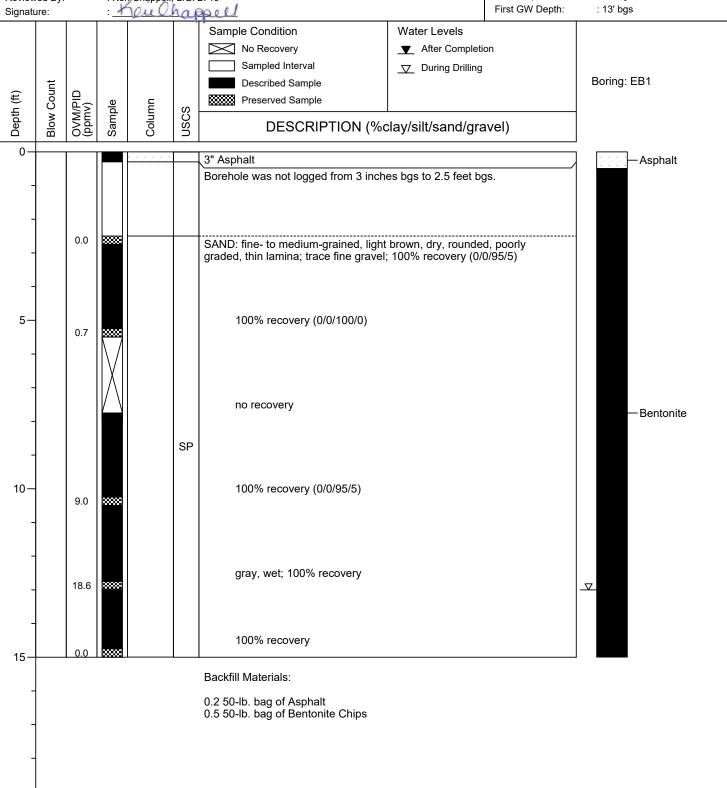
Site:

20

Reviewed By: : Keri Chappell, L.G. 2719

: 031447

: ExxonMobil ADC, 2717/2731 Federal Avenue, Everett, WA





BORING LOG EB2

(Page 1 of 1)

Project No.: : 031447

: ExxonMobil ADC, 2717/2731 Federal Avenue, Everett, WA

Logged By: : Brett McLees

20

Date Drilled: : 10/13/20

Drilling Co.: : Holocene Drilling, Inc.

Drilling Method: : Push Probe Sampling Method: : Dual Tube

Borehole Diameter: : 3"

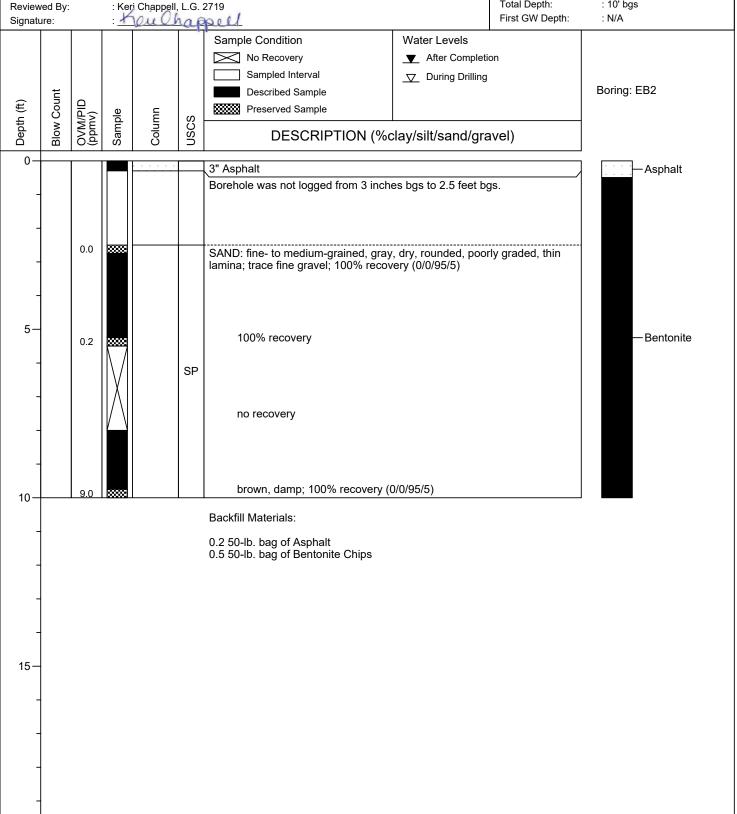
Casing Diameter: : N/A

Latitude : N/A

Longitude : N/A

Total Depth: : 10' bgs

First GW Depth: : N/A





: 031447

Project No.:

20

BORING LOG EB3

(Page 1 of 1)

Date Drilled: : 10/12/20 Drilling Co.: : Holocene Drilling, Inc. : Push Probe Drilling Method: Sampling Method: : Dual Tube

Borehole Diameter: : 3" Casing Diameter: : N/A

Latitude : N/A : N/A : N/A

: ExxonMobil ADC, 2717/2731 Federal Avenue, Everett, WA Longitude Logged By: : Paul Prevou Total Depth: : 15' bgs Reviewed By: : Keri Chappell, L.G. 2719 First GW Depth: Signature: houthappell Sample Condition Water Levels No Recovery ▼ After Completion Sampled Interval During Drilling Boring: EB3 **Described Sample Blow Count** OVM/PID (ppmv) Depth (ft) Preserved Sample Column Sample **USCS** DESCRIPTION (%clay/silt/sand/gravel) 0 3" Asphalt -Asphalt Borehole was not logged from 3 inches bgs to 2.5 feet bgs. SAND: fine- to medium-grained, gray brown, dry; fine to coarse gravel, subangular; 40% recovery (0/10/50/40) SP 5 SILT: dark brown to olive gray, damp, fine gravel, subangular; 50% recovery (0/90/0/10) ML SAND: fine- to coarse-grained, dark brown, moist; trace silt; 60% Bentonite recovery (0/5/95/0) 10-100% recovery SW 100% recovery 100% recovery (0/5/90/5) 15 **Backfill Materials:** 0.2 50-lb. bag of Asphalt 0.5 50-lb. bag of Bentonite Chips

Note: PID unavailable for use during fieldwork on 10/12/20.



BORING LOG EB4

(Page 1 of 1)

Project No.: : 031447

: ExxonMobil ADC, 2717/2731 Federal Avenue, Everett, WA

Logged By: : Paul Prevou

Reviewed By: : Keri Chappell, L.G. 2719
Signature: : Luchappell

Date Drilled: : 10/12/20

Drilling Co.: : Holocene Drilling, Inc.

Drilling Method: : Push Probe Sampling Method: : Dual Tube

 Borehole Diameter:
 : 3"

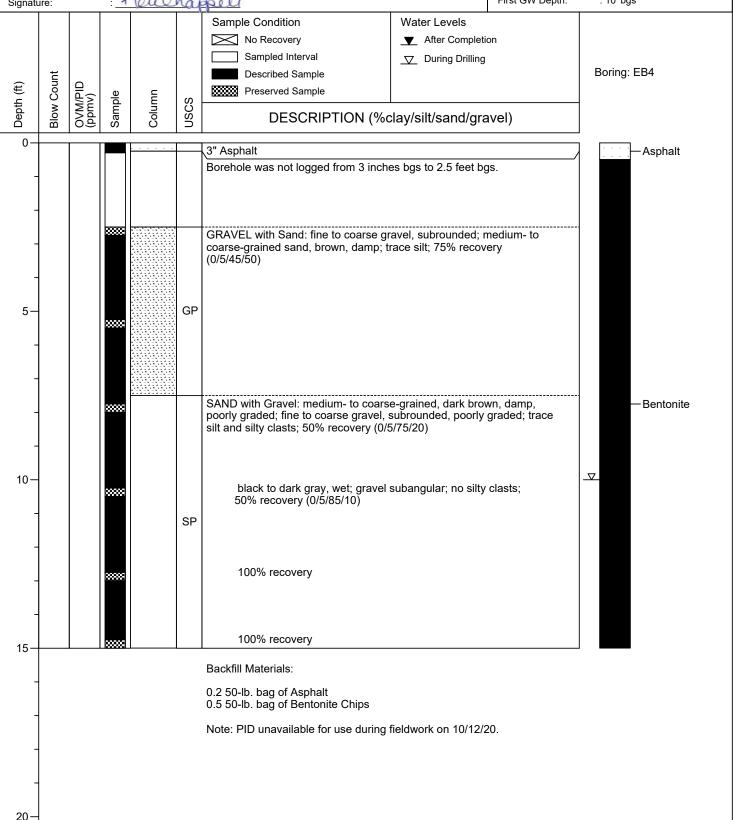
 Casing Diameter:
 : N/A

 Latitude
 : N/A

 Longitude
 : N/A

 Total Depth:
 : 15' bgs

 First GW Depth:
 : 10' bgs



Date Drilled: : 10/12/20 Drilling Co.: Cardno : Holocene Drilling, Inc. **BORING LOG EB5** : Push Probe Drilling Method: Sampling Method: : Dual Tube (Page 1 of 1) Borehole Diameter: : 3" Casing Diameter: : N/A Project No.: : 031447 Latitude : N/A : ExxonMobil ADC, 2717/2731 Federal Avenue, Everett, WA Longitude : N/A Logged By: : Paul Prevou Total Depth: : 10' bgs Reviewed By: : Keri Chappell, L.G. 2719 First GW Depth: : N/A Signature: howchappell Sample Condition Water Levels No Recovery ▼ After Completion Sampled Interval During Drilling Boring: EB5 **Described Sample Blow Count** OVM/PID (ppmv) Depth (ft) Preserved Sample Column Sample **USCS** DESCRIPTION (%clay/silt/sand/gravel) 0 3" Asphalt -Asphalt Borehole was not logged from 3 inches bgs to 2.5 feet bgs. GRAVEL with Sand: fine to coarse gravel, subrounded to subangular; fine- to coarse-grained sand, light gray, dry, well graded; trace silt; 80% recovery (0/5/40/55) GP 5 well graded sand, occasional silty clasts; 80% recovery Bentonite (0/5/30/65)SAND with Gravel: medium- to coarse-grained, gray, dry, poorly graded; fine to coarse gravel, subangular to subrounded, well graded; trace silt; 80% recovery (0/5/70/25) SP 100% recovery 10 Backfill Materials: 0.2 50-lb. bag of Asphalt 0.5 50-lb. bag of Bentonite Chips Note: PID unavailable for use during fieldwork on 10/12/20. 15-

20



20-

BORING LOG EB6

(Page 1 of 1)

Date Drilled: : 10/12/20 Drilling Co.: : Holocene Drilling, Inc. Drilling Method: : Push Probe Sampling Method: : Dual Tube Borehole Diameter: : 3"

Casing Diameter: : N/A Latitude : N/A

Project No.: : 031447 Site: : ExxonMobil ADC, 2717/2731 Federal Avenue, Everett, WA

Review	Logged By: Reviewed By:			ul Prevou i Chappel	, L.G. :		Longitude Total Depth: First GW Depth:	: N/A : 10' bgs : N/A	
Depth (ft)	Blow Count	OVM/PID (ppmv)	Sample	Column	nscs	Sample Condition No Recovery Sampled Interval Described Sample DESCRIPTION (%clay/silt/sample)	Completions Drilling		Boring: EB6
0-						3" Asphalt Borehole was not logged from 3 inches bgs to 2.	5 feet bg	gs.	— Asphalt
-			****			GRAVEL with Sand: fine to coarse gravel, suban fine- to coarse-grained sand, light gray, dry, well 60% recovery (0/5/40/55)	ngular to graded;	subrounded; trace silt;	
5 — -			200000		GW	gray, well graded sand; trace silty clasts; 8 (0/5/30/65)	30%	recovery	— Bentonite
-			88888		SP	SAND with Gravel: medium- to coarse-grained, graded; fine to coarse gravel, subangular to subr 80% recovery (0/5/75/20)	gray, dan rounded;	np, poorly trace silt;	
10-			8888			100% recovery (0/5/75/20)			
-						Backfill Materials: 0.2 50-lb. bag of Asphalt 0.5 50-lb. bag of Bentonite Chips Note: PID unavailable for use during fieldwork or	า 10/12/2	20.	
15-									

Date Drilled: : 10/12/20 : Holocene Drilling, Inc. Cardno Drilling Co.: **BORING LOG EB7** Drilling Method: : Push Probe Sampling Method: : Dual Tube (Page 1 of 1) Borehole Diameter: : 3" Casing Diameter: : N/A Project No.: : 031447 Latitude : N/A : ExxonMobil ADC, 2717/2731 Federal Avenue, Everett, WA Longitude : N/A Logged By: : Paul Prevou Total Depth: : 10' bgs Reviewed By: : Kerj Chappell, L.G. 2719 Houlhappell First GW Depth: : N/A Signature: Sample Condition Water Levels No Recovery ▼ After Completion Sampled Interval During Drilling Boring: EB7 **Described Sample Blow Count** OVM/PID (ppmv) Depth (ft) Preserved Sample Column Sample **USCS** DESCRIPTION (%clay/silt/sand/gravel) 0 3" Asphalt -Asphalt Boring was not logged from 3 inches bgs to 5 feet bgs. No recovery 5 GRAVEL with Sand: fine to coarse gravel, subrounded to subangular, well graded; fine- to coarse-grained sand, light brown, dry, well graded; trace silty clasts; 30% recovery (0/5/30/65) Bentonite GW SILT: olive brown, damp, well consolidated; 30% recovery (0/100/0/0) ML SAND: medium- to coarse-grained, damp, poorly graded, non-plastic; 10 trace fine gravel, subangular; 80% recovery (0/5/90/5)

Backfill Materials:

15-

20

0.2 50-lb. bag of Asphalt

0.5 50-lb. bag of Bentonite Chips

Note: PID unavailable for use during field work on 10/12/20.



: 031447

BORING LOG EB8

(Page 1 of 1)

(Page 1

: ExxonMobil ADC, 2717/2731 Federal Avenue, Everett, WA

Logged By: : Brett McLees

Project No.:

Reviewed By: : Keri Chappell, L.G. 2719 Signature: : You Chappell Date Drilled: : 10/14/20

Drilling Co.: : Holocene Drilling, Inc.

Drilling Method: : Push Probe Sampling Method: : Dual Tube

 Borehole Diameter:
 : 3"

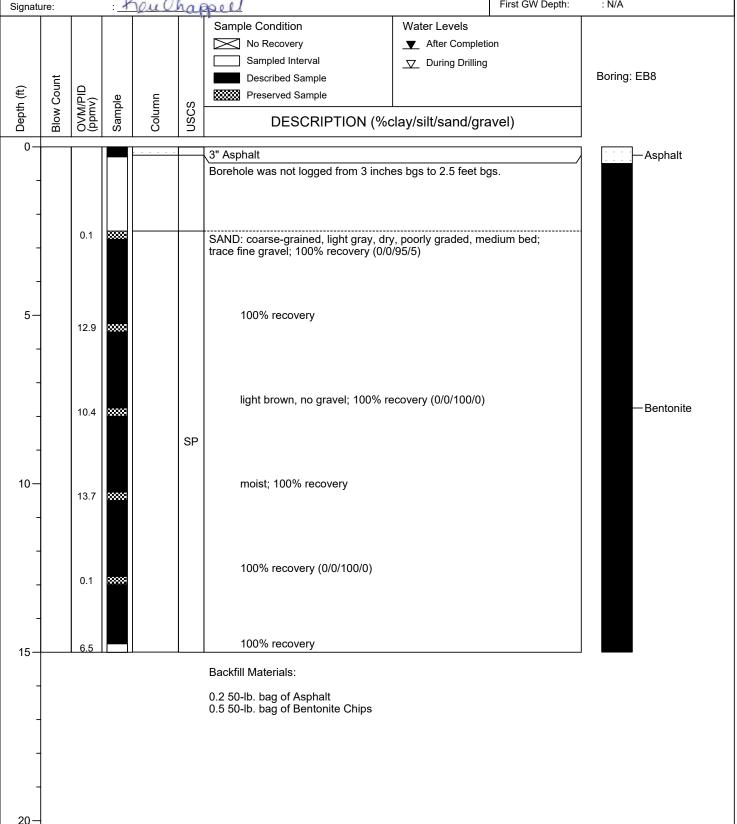
 Casing Diameter:
 : N/A

 Latitude
 : N/A

 Longitude
 : N/A

 Total Depth:
 : 15' bgs

 First GW Depth:
 : N/A





(Page 1 of 1)

Date Drilled: : 10/14/20
Drilling Co.: : Holocene Drilling, Inc.

Drilling Method: : Push Probe
Sampling Method: : Dual Tube

Borehole Diameter: : 3"
Casing Diameter: : N/A
Latitude : N/A
Longitude : N/A
Total Depth: : 10' bgs

Project No.: : 031447

15-

20

Site: : ExxonMobil ADC, 2717/2731 Federal Avenue, Everett, WA

Longitude Logged By: : Brett McLees Total Depth: Reviewed By: : Kerj Chappell, L.G. 2719 First GW Depth: Houlhappell : N/A Signature: Sample Condition Water Levels ▼ After Completion No Recovery Sampled Interval □ During Drilling Boring: EB9 **Described Sample Blow Count** Depth (ft) OVM/PID (ppmv) Preserved Sample Column Sample **USCS** DESCRIPTION (%clay/silt/sand/gravel) 3" Asphalt -Asphalt Borehole was not logged from 3 inches bgs to 2.5 feet bgs. 0.0 SAND: coarse-grained, gray, dry, rounded, poorly graded, thin bed; trace fine gravel; 100% recovery (0/0/95/5) 100% recovery 5-Bentonite 44.0 SP no gravel; 100% recovery (0/0/100/0) 2.0 CH | CLAY: wood debris; 100% recovery (100/0/0/0) 10 Backfill Materials: 0.2 50-lb. bag of Asphalt 0.5 50-lb. bag of Bentonite Chips



(Page 1 of 1)

Project No.: : 031447

20

Site: : ExxonMobil ADC, 2717/2731 Federal Avenue, Everett, WA

Logged By: : Brett McLees

Reviewed By: : Keri Chappell, L.G. 2719
Signature: : Luchapell

Date Drilled: : 10/14/20

Drilling Co.: : Holocene Drilling, Inc.

Drilling Method: : Push Probe Sampling Method: : Dual Tube

 Borehole Diameter:
 : 3"

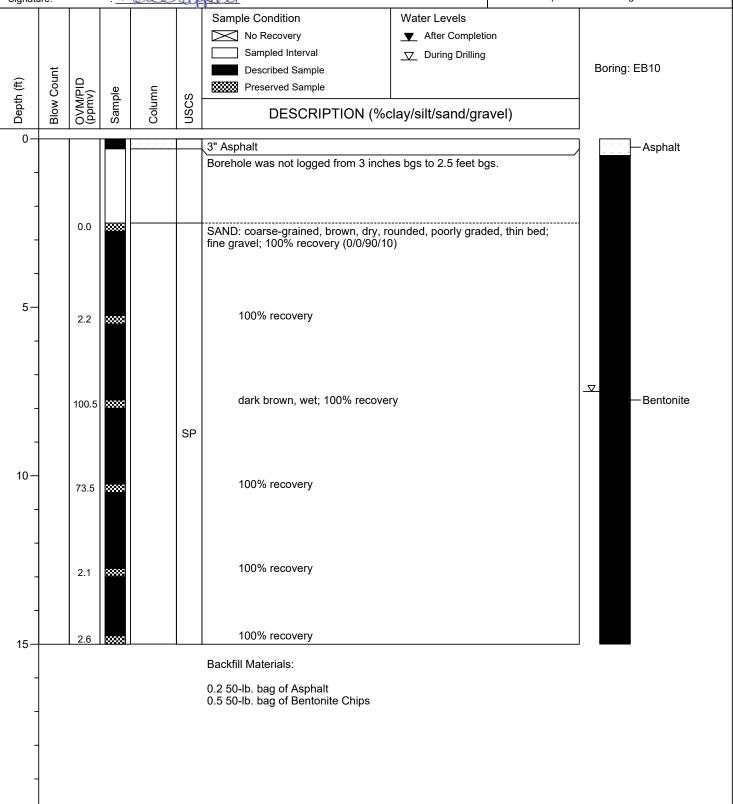
 Casing Diameter:
 : N/A

 Latitude
 : N/A

 Longitude
 : N/A

 Total Depth:
 : 15' bgs

 First GW Depth:
 : 7.5' bgs





(Page 1 of 1)

Date Drilled: : 10/12/20

Drilling Co.: : Holocene Drilling, Inc. Drilling Method: : Push Probe : Dual Tube

Sampling Method: Borehole Diameter: : 3" Casing Diameter: : N/A Latitude : N/A Longitude : N/A Total Depth: : 15' bgs

Project No.: : 031447

20-

: ExxonMobil ADC, 2717/2731 Federal Avenue, Everett, WA

Logged By: : Paul Prevou

Review Signatu			: Kei	i Chappell	, L.G.	2719		Total Depth: First GW Depth:	: 15' bgs : 7.5' bgs
Signatu			- 28	<u>juico</u>	rap	Sample Condition	Water Levels		1
	<u>+</u>					No Recovery	▼ After Completi	on	
						Sampled Interval	✓ During Drilling		
						Described Sample			Boring: EB11
(£)	onu	□	a)	_		Preserved Sample			J
Depth (ft)	Blow Count	M/P mv)	Sample	Column	nscs				
Del	Blo	OVM/PID (ppmv)	Sar	S		DESCRIPTION (%clay/silt/sand/gravel)			
0-		3" Asphalt						Asphalt	
	Borehole was not logged from 3 inches bgs						es bgs to 2.5 feet bg	/ gs.	/ / / / / / / / / / / / / / / / / / /
-									
			***						-
					0.47	SAND with Gravel: fine- to coarse-graded; fine to coarse gravel, subang	ained, dark brown, d Jular to angular, wel	lamp, well Laraded:	
					SW	60% recovery (0/10/50/40)	jaiar to arigaiar, wor	, graada,	
-						SILT: moist, reduced organic materia			
_					ML		,	, ,	
5-			20000			SAND: medium- to coarse-grained, li	ght brown, damp, p	oorly graded;	"
_						trace silt; 60% recovery (0/5/95/0)			
-									
						gray, wet, NAPL observed; 100	1% recovery		Bentonite
-			*****			gray, wet, NAI E observed, 100	770 recovery		Demonite
1									
10-					SP				
			20000			NAPL observed; 100% recover	ry		
4									
+									
			****			NAPL observed; 100% recover	ry		
1						,	,		
15			20000			no NAPL; 100% recovery			
						Backfill Materials:			
-						0.2 50-lb. bag of Asphalt			
						0.5 50-lb. bag of Bentonite Chips			
, 1						Note: PID unavailable for use during	fieldwork on 10/12/2	20.	
-									



(Page 1 of 1)

Project No.: : 031447

Site: : ExxonMobil ADC, 2717/2731 Federal Avenue, Everett, WA

Logged By: : Paul Prevou

Reviewed By: : Keri Chappell, L.G. 2719
Signature: : Keri Chappell, L.G. 2719

Date Drilled: : 10/12/20

Drilling Co.: : Holocene Drilling, Inc.

Drilling Method: : Push Probe Sampling Method: : Dual Tube

 Borehole Diameter:
 : 3"

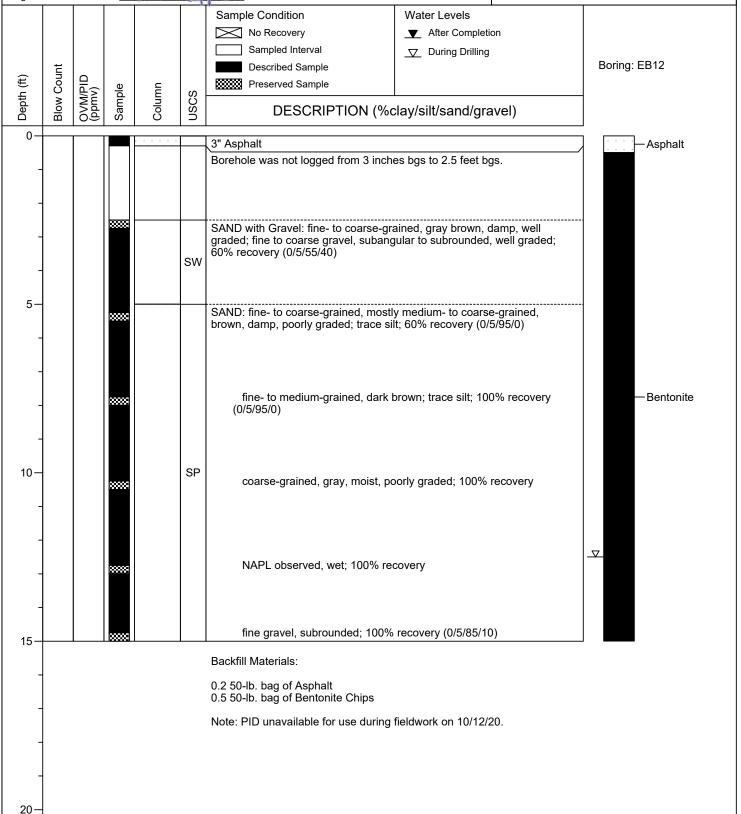
 Casing Diameter:
 : N/A

 Latitude
 : N/A

 Longitude
 : N/A

 Total Depth:
 : 15' bgs

 First GW Depth:
 : 12.5' bgs





(Page 1 of 1)

Project No.: : 031447

Site: : ExxonMobil ADC, 2717/2731 Federal Avenue, Everett, WA

Logged By: : Brett McLees

Reviewed By: : Keri Chappell, L.G. 2719
Signature: : Luchapell

Date Drilled: : 10/14/20

Drilling Co.: : Holocene Drilling, Inc.

Drilling Method: : Push Probe Sampling Method: : Dual Tube

 Borehole Diameter:
 : 3"

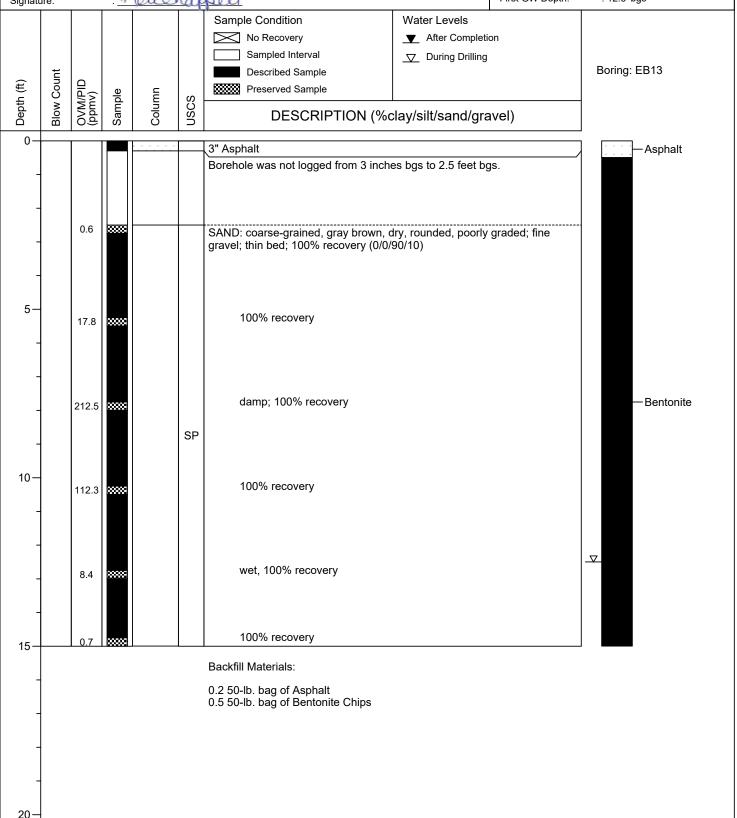
 Casing Diameter:
 : N/A

 Latitude
 : N/A

 Longitude
 : N/A

 Total Depth:
 : 15' bgs

 First GW Depth:
 : 12.5' bgs





(Page 1 of 1)

Project No.: : 031447

20

Site: : ExxonMobil ADC, 2717/2731 Federal Avenue, Everett, WA

Logged By: : Brett McLees

Reviewed By: : Keri Chappell, L.G. 2719
Signature: : Luchapell

Date Drilled: : 10/14/20

Drilling Co.: : Holocene Drilling, Inc.

Drilling Method: : Push Probe Sampling Method: : Dual Tube

Borehole Diameter: : 3"

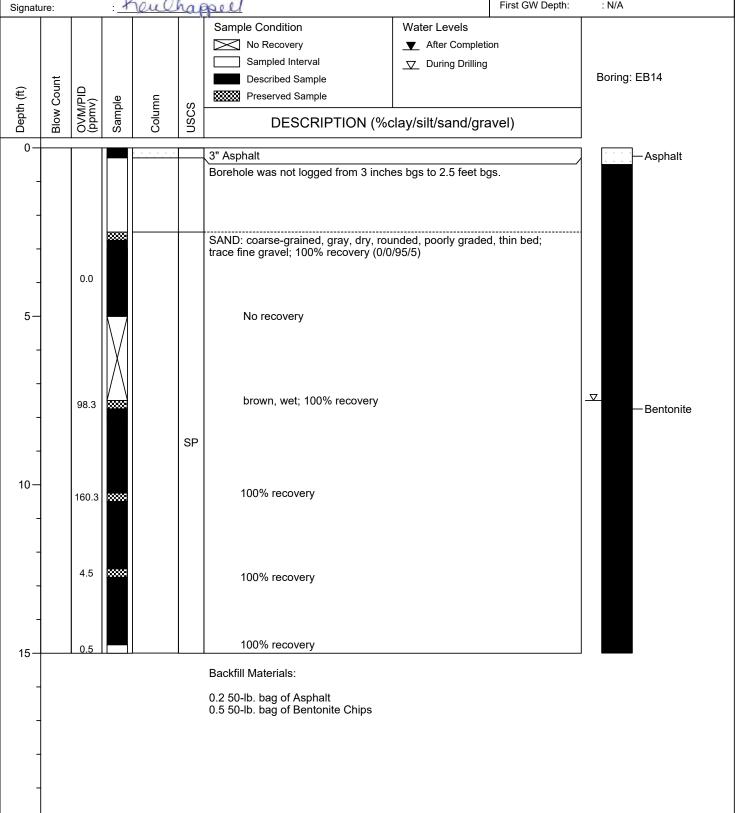
Casing Diameter: : N/A

Latitude : N/A

Longitude : N/A

Total Depth: : 15' bgs

First GW Depth: : N/A





(Page 1 of 1)

Project No.: : 031447

20

: ExxonMobil ADC, 2717/2731 Federal Avenue, Everett, WA

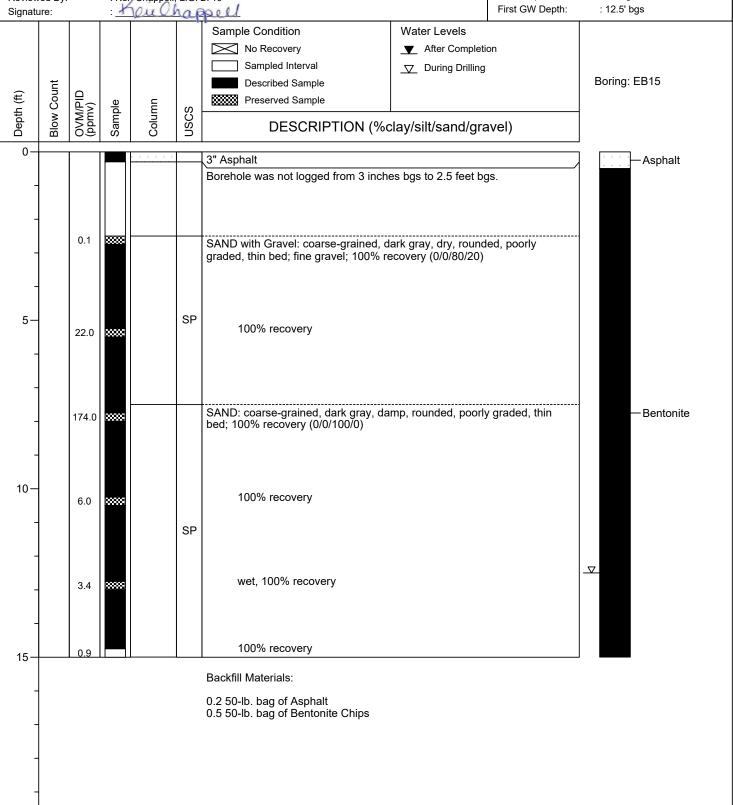
Logged By: : Brett McLees

Reviewed By: : Kerj Chappell, L.G. 2719 Date Drilled: : 10/14/20

Drilling Co.: : Holocene Drilling, Inc.

: Push Probe Drilling Method: Sampling Method: : Dual Tube

Borehole Diameter: : 3" Casing Diameter: : N/A Latitude : N/A Longitude : N/A Total Depth: : 15' bgs





(Page 1 of 1)

Project No.: : 031447

Site: : ExxonMobil/ADC, 2717/2731 Federal Avenue, Everett, WA

Logged By: : Brett McLees

Reviewed By: : Keri Chappell, L.G. 2719
Signature: : : Lucha Bell

Date Drilled: : 10/13/20

Drilling Co.: : Holocene Drilling, Inc.

Drilling Method: : Push Probe Sampling Method: : Dual Tube

 Borehole Diameter:
 : 3"

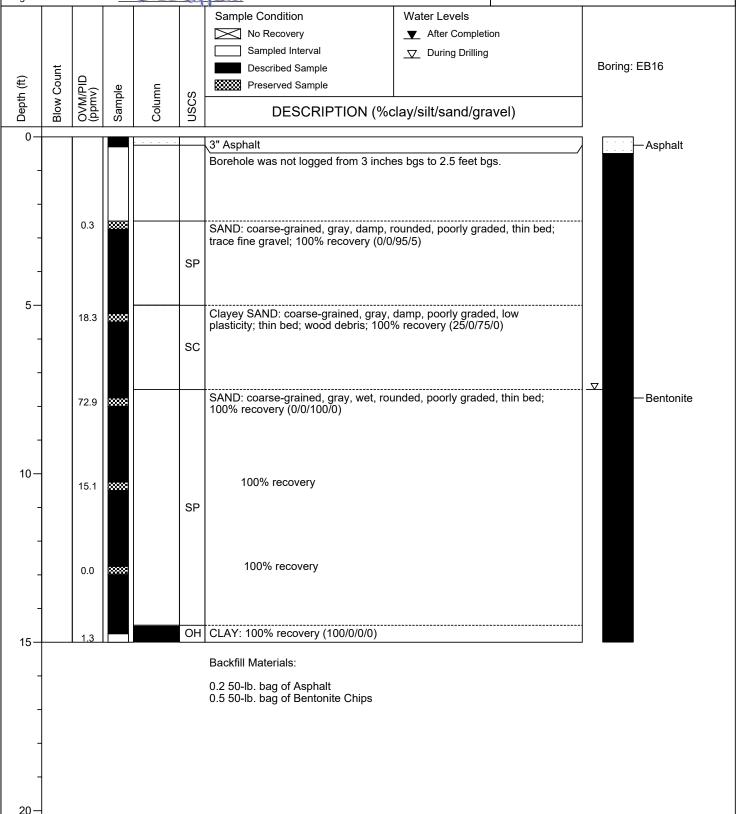
 Casing Diameter:
 : N/A

 Latitude
 : N/A

 Longitude
 : N/A

 Total Depth:
 : 15' bgs

 First GW Depth:
 : 7.5' bgs





(Page 1 of 1)

Project No.: : 031447

Site: : ExxonMobil ADC, 2717/2731 Federal Avenue, Everett, WA

Logged By: : Brett McLees

Reviewed By: : Keri Chappell, L.G. 2719
Signature: : Louchappell

Date Drilled: : 10/13/2020

Drilling Co.: : Holocene Drilling, Inc.

Drilling Method: : Push Probe Sampling Method: : Dual Tube

 Borehole Diameter:
 : 3"

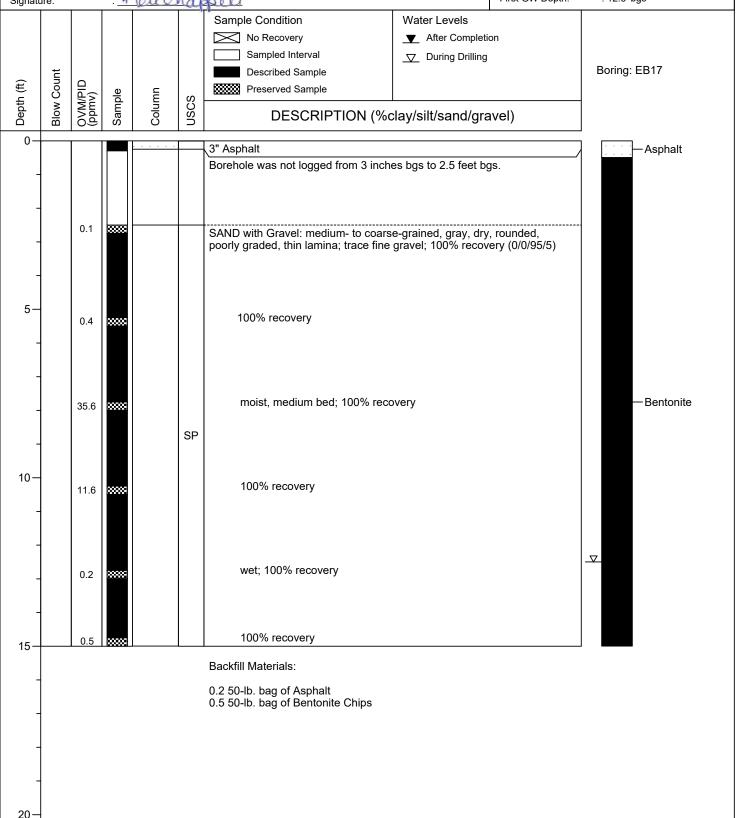
 Casing Diameter:
 : N/A

 Latitude
 : N/A

 Longitude
 : N/A

 Total Depth:
 : 15' bgs

 First GW Depth:
 : 12.5' bgs





(Page 1 of 1)

Project No.: : 031447

20

Site: : ExxonMobil ADC, 2717/2731 Federal Avenue, Everett, WA

Logged By: : Brett McLees

Date Drilled: : 10/13/20

Drilling Co.: : Holocene Drilling, Inc.

Drilling Method: : Push Probe Sampling Method: : Dual Tube

Borehole Diameter: : 3"

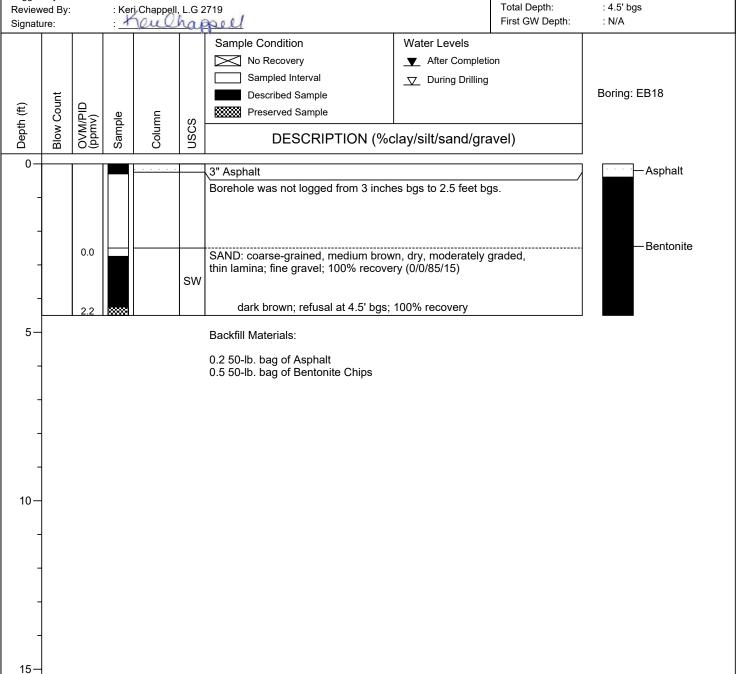
Casing Diameter: : N/A

Latitude : N/A

Longitude : N/A

Total Depth: : 4.5' bgs

First GW Depth: : N/A





(Page 1 of 1)

Project No.: : 031447

: ExxonMobil ADC, 2717/2731 Federal Avenue, Everett, WA

Logged By: : Brett McLees

Site:

Reviewed By: : Keri Chappell, L.G. 2719
Signature: : Louch Bold

Date Drilled: : 10/13/20

Drilling Co.: : Holocene Drilling, Inc.

Drilling Method: : Push Probe
Sampling Method: : Dual Tube
Borehole Diameter: : 3"

Casing Diameter: : N/A
Latitude : N/A
Longitude : N/A
Total Depth: : 15' bgs
First GW Depth: : N/A

Signatu	re:		: +	soul	hai	pell		First GW Depth:	: N/A
Depth (ft)	Blow Count	OVM/PID (ppmv)	Sample	Column	SOSO	Sample Condition No Recovery Sampled Interval Described Sample Preserved Sample DESCRIPTION (%c	Water Levels ▼ After Completing During Drilling Clay/silt/sand/gra		Boring: EB19
						3" Asphalt		/	Asphalt
-		7.0	****			Borehole was not logged from 3 inches a second seco			
5-		95.7	20000			100% recovery			
10-		77.2	*****		SP	100% recovery			— Bentonite
-		0.6	*****		PT	PEAT: reduced organics			
-		0.4	*****		SP	SAND: coarse-grained, gray, damp, p wood debris; 100% recovery (0/0/100	poorly graded; thin b 0/0)	oed, trace	
15		52.3	20000			100% recovery			
-						Backfill Materials: 0.2 50-lb. bag of Asphalt 0.5 50-lb. bag of Bentonite Chips			
20-									



(Page 1 of 1)

Project No.: : 031447

20

Site: : ExxonMobil ADC, 2717/2731 Federal Avenue, Everett, WA

Logged By: : Brett McLees

Date Drilled: : 10/13/20

Drilling Co.: : Holocene Drilling, Inc.

Drilling Method: : Push Probe Sampling Method: : Dual Tube

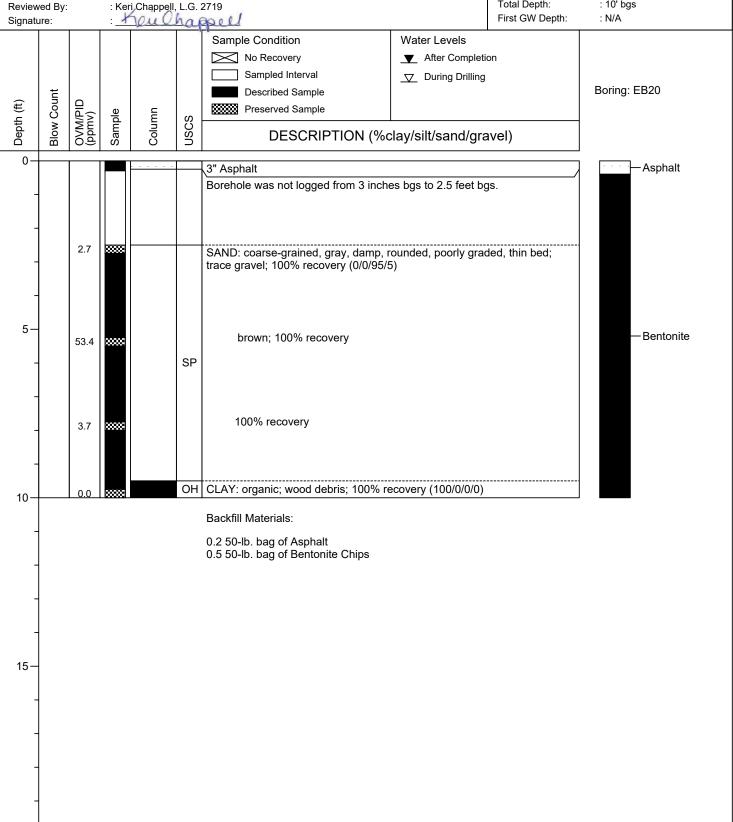
Borehole Diameter: : 3"

Casing Diameter: : N/A

Latitude : N/A

Longitude : N/A

Total Depth: : 10' bgs





(Page 1 of 1)

Project No.: : 031447

Site: : ExxonMobil ADC, 2717/2731 Federal Avenue, Everett, WA

Logged By: : Brett McLees

Reviewed By: : Keri Chappell, L.G. 2719
Signature: : Luchapell

Date Drilled: : 10/13/20

Drilling Co.: : Holocene Drilling, Inc.

Drilling Method: : Push Probe Sampling Method: : Dual Tube

Borehole Diameter: : 3"

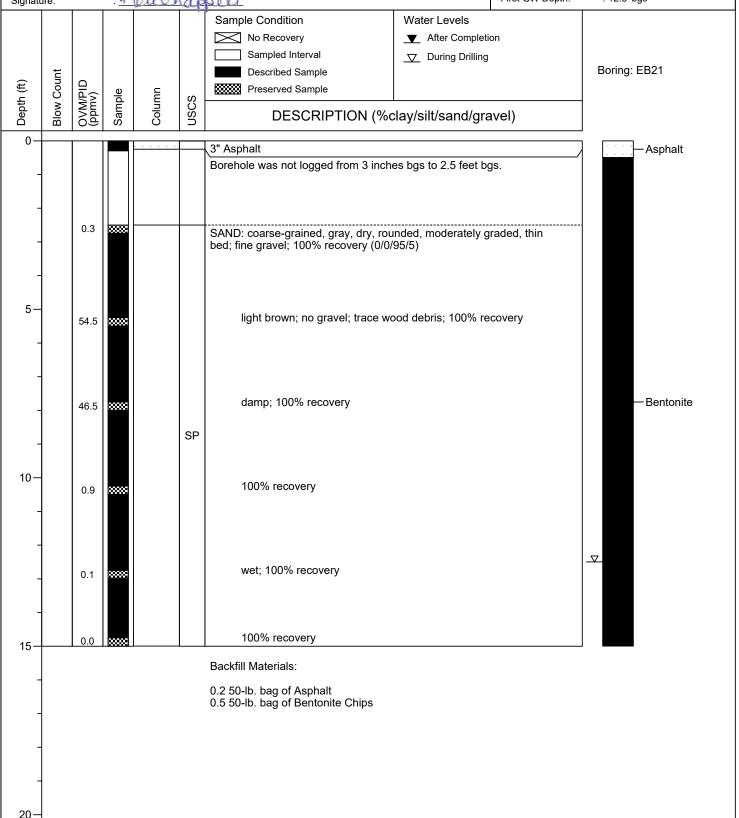
Casing Diameter: : N/A

Latitude : N/A

Longitude : N/A

Total Depth: : 15' bgs

First GW Depth: : 12.5' bgs





(Page 1 of 1)

Project No.: : 031447

15-

20

: ExxonMobil ADC, 2717/2731 Federal Avenue, Everett, WA

Logged By: : Brett McLees

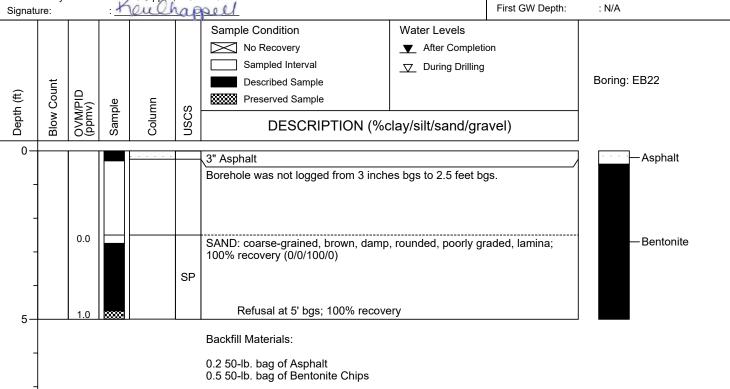
: Keri Chappell, L.G. 2719 : How happell Reviewed By:

Date Drilled: : 10/13/20

Drilling Co.: : Holocene Drilling, Inc.

Drilling Method: : Push Probe Sampling Method: : Dual Tube

Borehole Diameter: : 3" Casing Diameter: : N/A Latitude : N/A Longitude : N/A Total Depth: : 5' bgs







(Page 1 of 1)

Project No.: : 031447

20

Site: : ExxonMobil ADC, 2717/2731 Federal Avenue, Everett, WA

Logged By: : Brett McLees

Reviewed By: : Keri Chappell, L.G. 2719
Signature: : Luchapell

Date Drilled: : 10/14/20

Drilling Co.: : Holocene Drilling, Inc.

Drilling Method: : Push Probe Sampling Method: : Dual Tube

Borehole Diameter: : 3"

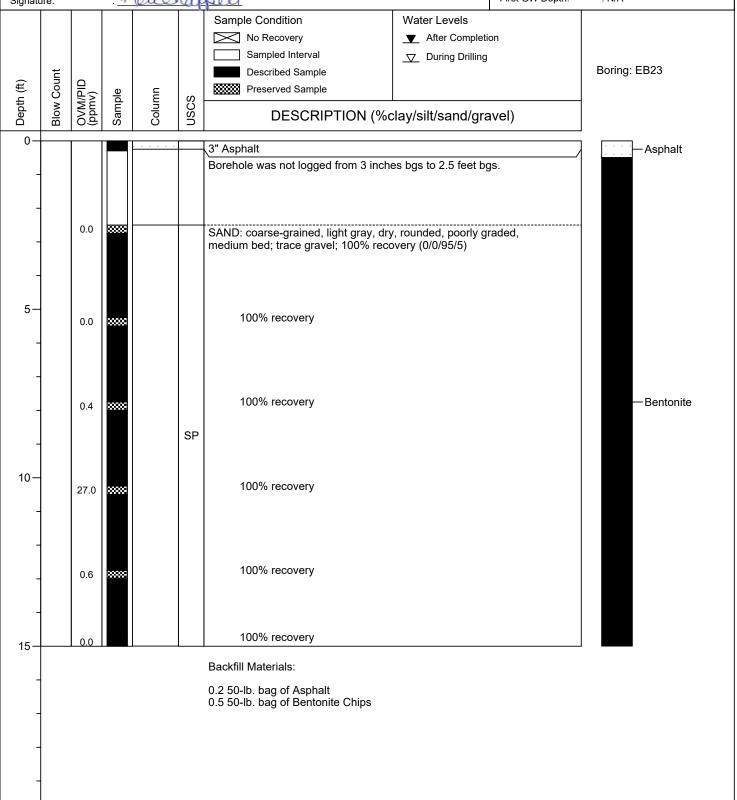
Casing Diameter: : N/A

Latitude : N/A

Longitude : N/A

Total Depth: : 15' bgs

First GW Depth: : N/A





(Page 1 of 1)

Project No.: : 031447

Site: : ExxonMobil ADC, 2717/2731 Federal Avenue, Everett, WA

Logged By: : Brett McLees

Reviewed By: : Keri Chappell, L.G. 2719
Signature: : Luchappell

Date Drilled: : 10/13/20

Drilling Co.: : Holocene Drilling, Inc.

Drilling Method: : Push Probe Sampling Method: : Dual Tube

 Borehole Diameter:
 : 3"

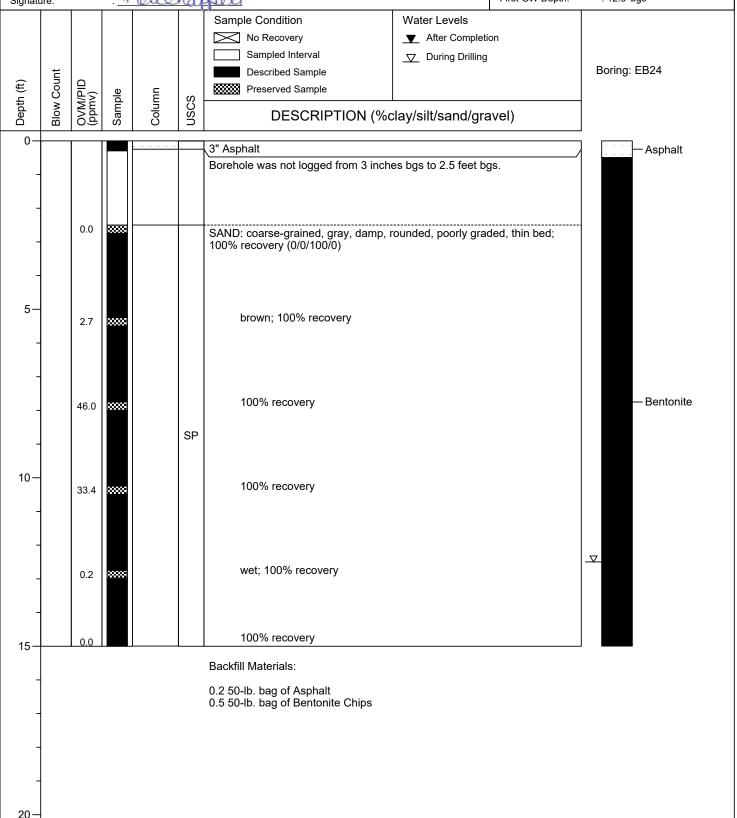
 Casing Diameter:
 : N/A

 Latitude
 : N/A

 Longitude
 : N/A

 Total Depth:
 : 15' bgs

 First GW Depth:
 : 12.5' bgs





(Page 1 of 1)

Project No.: : 031447

Site: : ExxonMobil ADC, 2717/2731 Federal Avenue, Everett, WA

Logged By: : Brett McLees

Reviewed By: : Keri Chappell, L.G. 2719
Signature: : Luchapell

Date Drilled: : 10/14/20

Drilling Co.: : Holocene Drilling, Inc.

Drilling Method: : Push Probe Sampling Method: : Dual Tube

 Borehole Diameter:
 : 3"

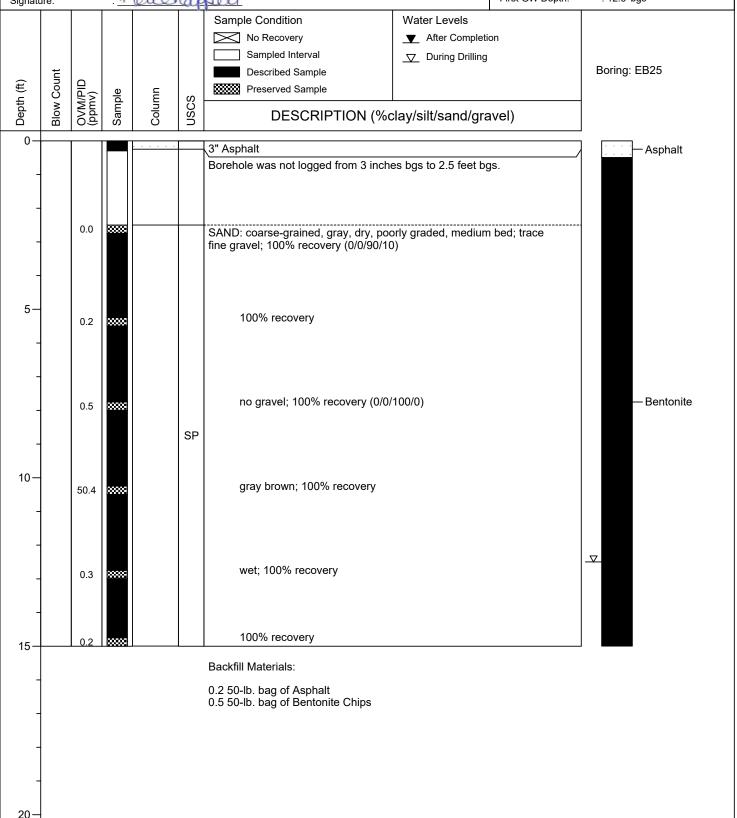
 Casing Diameter:
 : N/A

 Latitude
 : N/A

 Longitude
 : N/A

 Total Depth:
 : 15' bgs

 First GW Depth:
 : 12.5' bgs





(Page 1 of 1)

Project No.: : 031447

Site: : ExxonMobil ADC, 2717/2731 Federal Avenue, Everett, WA

Logged By: : Brett McLees

Reviewed By: : Keri Chappell, L.G. 2719
Signature: : Learner Chappell

Date Drilled: : 10/14/20

Drilling Co.: : Holocene Drilling, Inc.

Drilling Method: : Push Probe Sampling Method: : Dual Tube

 Borehole Diameter:
 : 3"

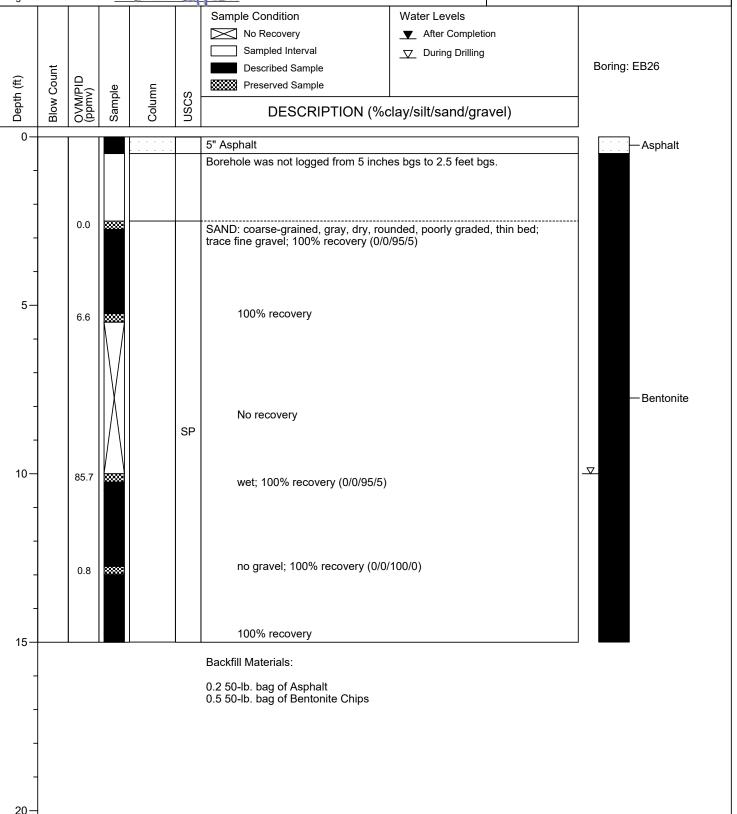
 Casing Diameter:
 : N/A

 Latitude
 : N/A

 Longitude
 : N/A

 Total Depth:
 : 15' bgs

 First GW Depth:
 : 10' bgs





(Page 1 of 1)

Project No.: : 031447

Site: : ExxonMobil ADC, 2717/2731 Federal Avenue, Everett, WA

Logged By: : Brett McLees

Reviewed By: : Keri Chappell, L.G. 2719
Signature: : Learner Chappell

Date Drilled: : 10/14/20

Drilling Co.: : Holocene Drilling, Inc.

Drilling Method: : Push Probe Sampling Method: : Dual Tube

 Borehole Diameter:
 : 3"

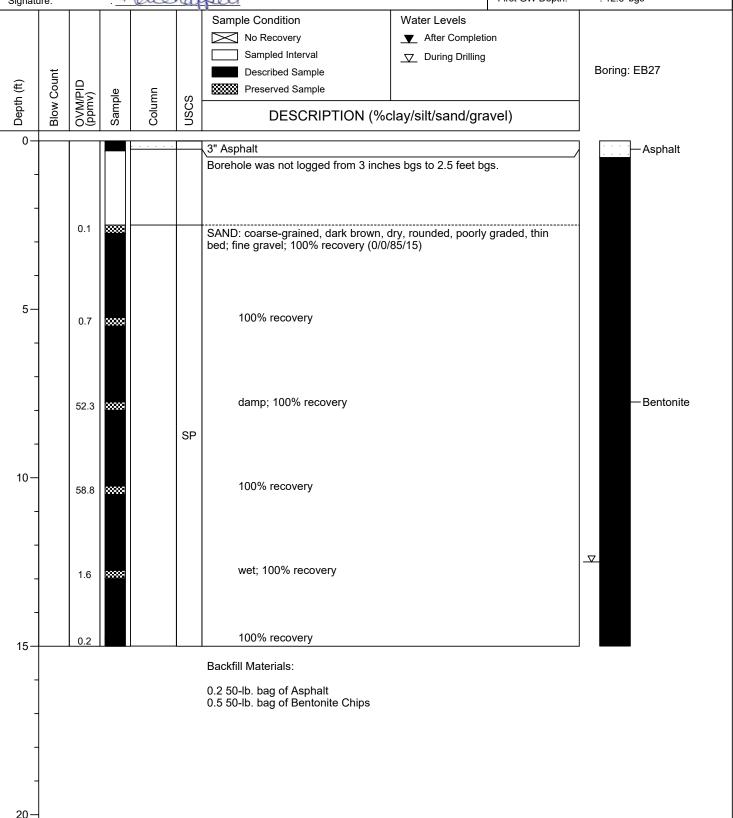
 Casing Diameter:
 : N/A

 Latitude
 : N/A

 Longitude
 : N/A

 Total Depth:
 : 15' bgs

 First GW Depth:
 : 12.5' bgs





(Page 1 of 1)

Project No.: : 031447

15-

20

Site: : ExxonMobil ADC, 2717/2731 Federal Avenue, Everett, WA

Logged By: : Brett McLees

Date Drilled: : 10/14/20

Drilling Co.: : Holocene Drilling, Inc.

Drilling Method: : Push Probe Sampling Method: : Dual Tube

Borehole Diameter: : 3"

Casing Diameter: : N/A

Latitude : N/A

Longitude : N/A

Total Depth: : 15' bgs

Total Depth: Reviewed By: : Kerj Chappell, L.G. 2719 First GW Depth: Houlhappell : N/A Signature: Sample Condition Water Levels ▼ After Completion No Recovery Sampled Interval □ During Drilling Boring: EB28 **Described Sample Blow Count** Depth (ft) OVM/PID (ppmv) Preserved Sample Sample Column **USCS** DESCRIPTION (%clay/silt/sand/gravel) 3" Asphalt -Asphalt Borehole was not logged from 3 inches bgs to 2.5 feet bgs. 0.3 SAND: coarse-grained, gray, dry, rounded, very poorly graded, thin bed; trace fine gravel; 100% recovery (0/0/95/5) 5-100% recovery Bentonite 0.6 SP damp; 100% recovery 0.2 100% recovery 10

Backfill Materials:

0.2 50-lb. bag of Asphalt

0.5 50-lb. bag of Bentonite Chips



(Page 1 of 1)

Project No.: : 031447

20

Site: : ExxonMobil ADC, 2717/2731 Federal Avenue, Everett, WA

Logged By: : Brett McLees

Reviewed By: : Keri Chappell, L.G. 2719
Signature: : : Luchappell

Date Drilled: : 10/14/20

Drilling Co.: : Holocene Drilling, Inc.

Drilling Method: : Push Probe Sampling Method: : Dual Tube

Borehole Diameter: : 3"

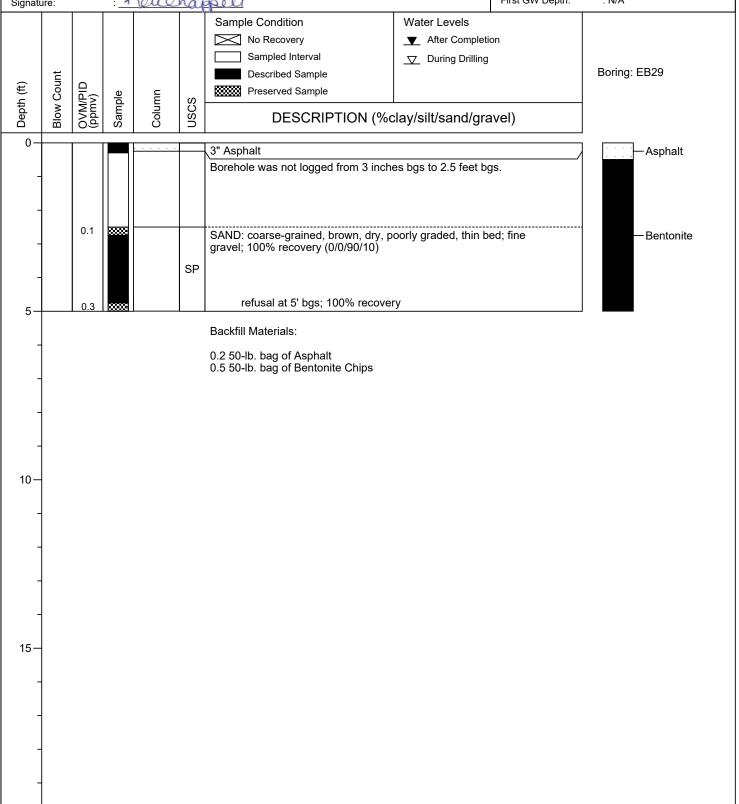
Casing Diameter: : N/A

Latitude : N/A

Longitude : N/A

Total Depth: : 5' bgs

First GW Depth: : N/A





(Page 1 of 1)

Project No.: : 031447

Site: : ExxonMobil ADC, 2717/2731 Federal Avenue, Everett, WA

Logged By: : Brett McLees

Reviewed By: : Keri Chappell, L.G. 2719
Signature: : Luchapell

Date Drilled: : 10/14/20

Drilling Co.: : Holocene Drilling, Inc.

Drilling Method: : Push Probe Sampling Method: : Dual Tube

 Borehole Diameter:
 : 3"

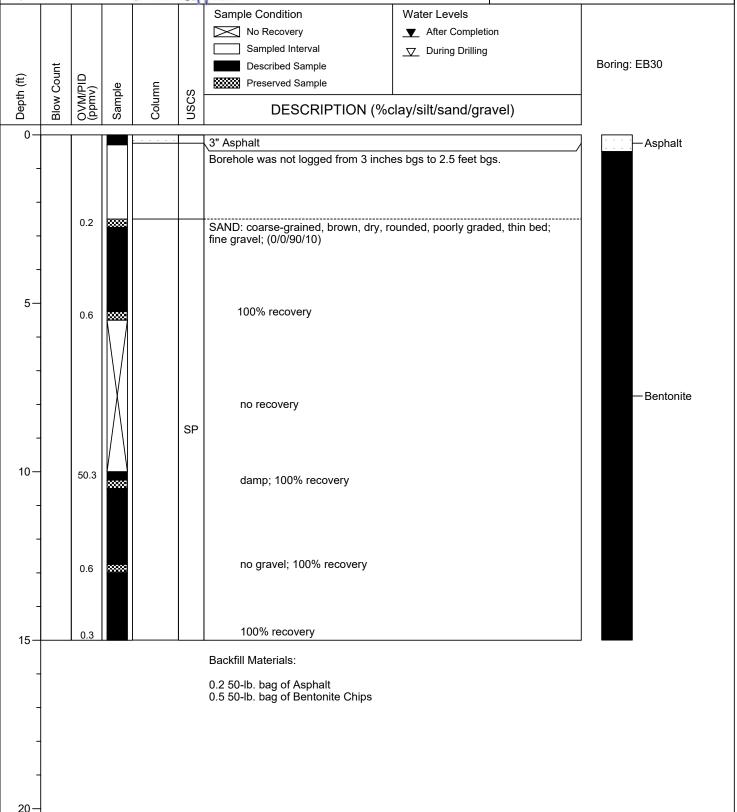
 Casing Diameter:
 : N/A

 Latitude
 : N/A

 Longitude
 : N/A

 Total Depth:
 : 15' bgs

 First GW Depth:
 : N/A





(Page 1 of 1)

Project No.: : 031447

20

Site: : ExxonMobil ADC, 2717/2731 Federal Avenue, Everett, WA

Logged By: : Paul Prevou

Reviewed By: : Keri Chappell, L.G. 2719
Signature: : Luchapell

Date Drilled: : 01/25/21

Drilling Co.: : Holocene Drilling, Inc.

Drilling Method: : Push Probe Sampling Method: : Dual Tube

Borehole Diameter: : 3"

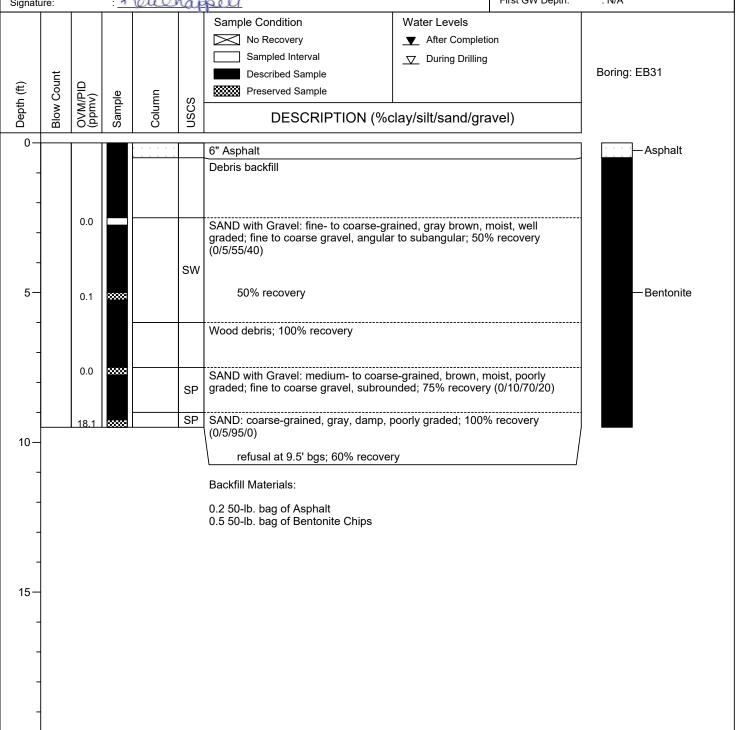
Casing Diameter: : N/A

Latitude : N/A

Longitude : N/A

Total Depth: : 9.5' bgs

First GW Depth: : N/A





BORING LOG EB31A

(Page 1 of 1)

Project No.: : 031447

: ExxonMobil ADC, 2717/2731 Federal Avenue, Everett, WA

Logged By: : Paul Prevou

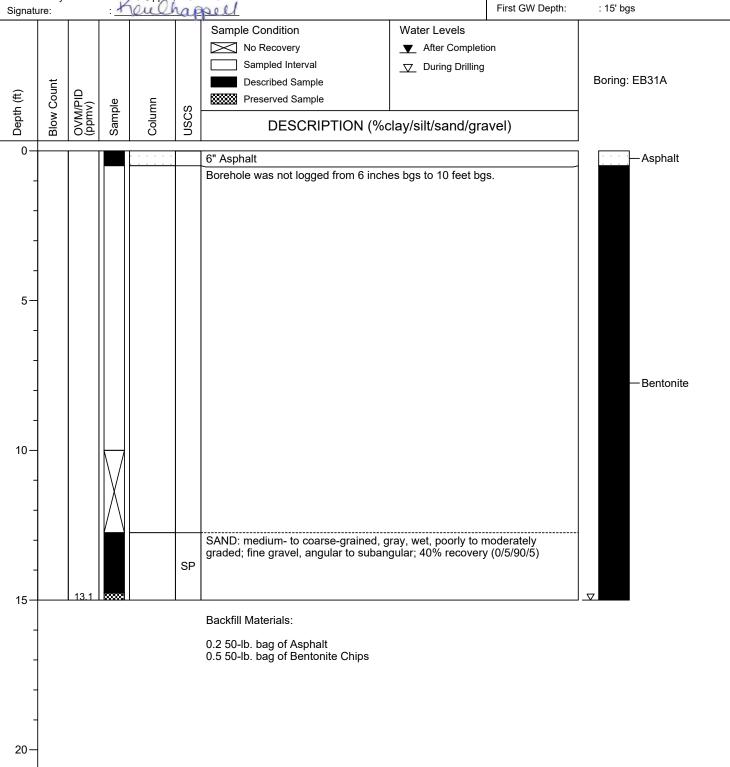
: Keri Chappell, L.G. 2719 : how happell Reviewed By:

Date Drilled: : 01/27/21

Drilling Co.: : Holocene Drilling, Inc.

Drilling Method: : Push Probe Sampling Method: : Dual Tube

Borehole Diameter: : 3" Casing Diameter: : N/A Latitude : N/A Longitude : N/A Total Depth: : 15' bgs





BORING LOG EB31B

(Page 1 of 1)

Date Drilled: : 01/27/21

Drilling Co.: : Holocene Drilling, Inc.

Drilling Method: : Push Probe Sampling Method: : Dual Tube

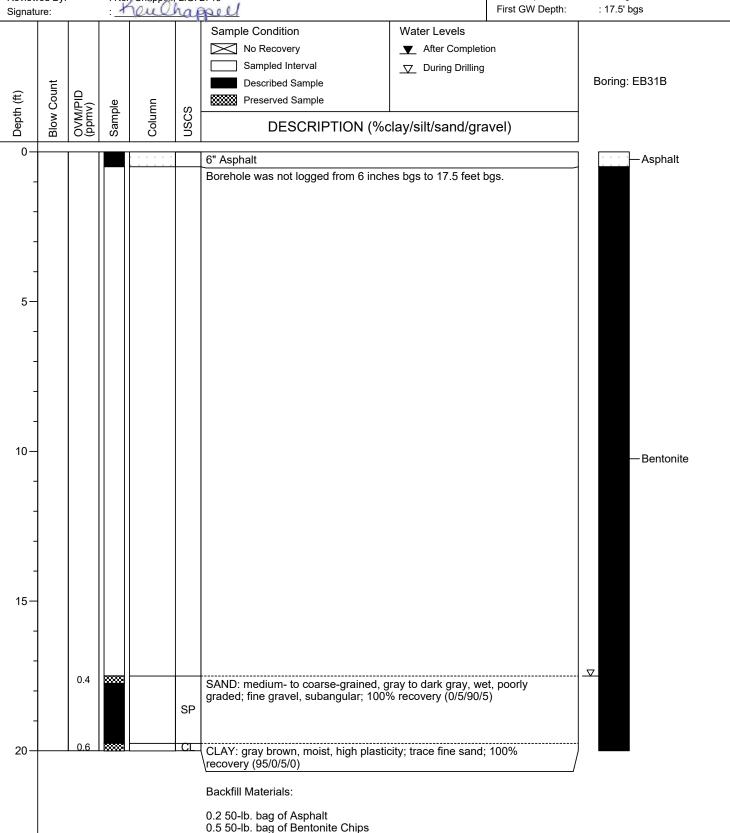
Borehole Diameter: : 3" Casing Diameter: : N/A Latitude : N/A Longitude : N/A Total Depth: : 20' bgs

Project No.: : 031447

: ExxonMobil ADC, 2717/2731 Federal Avenue, Everett, WA

Logged By: : Paul Prevou

: Keri Chappell, L.G. 2719 Reviewed By:





(Page 1 of 1)

Project No.: : 031447

: ExxonMobil ADC, 2717/2731 Federal Avenue, Everett, WA

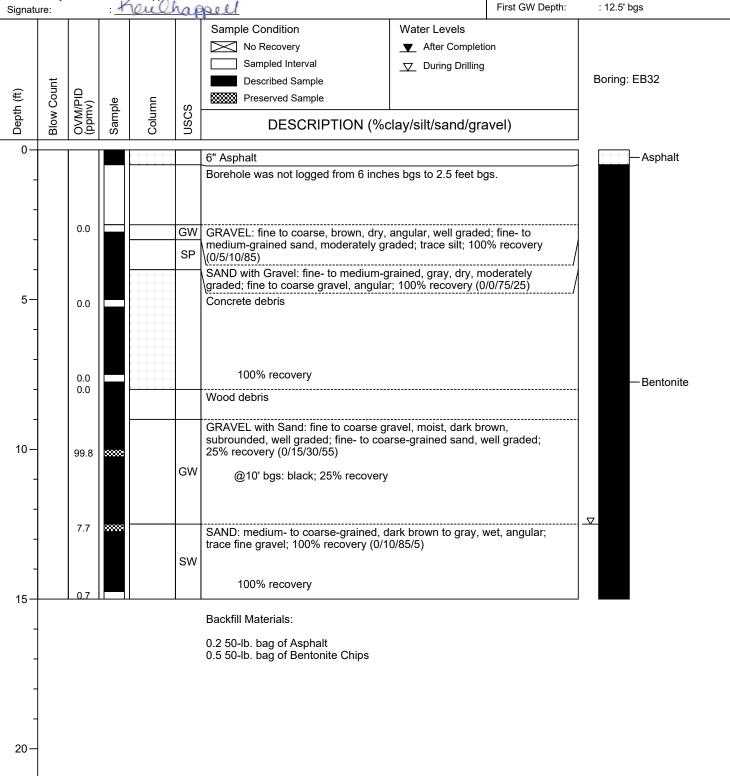
Logged By: : Paul Prevou

Reviewed By: : Keri Chappell, L.G. 2719 Date Drilled: : 01/25/21

Drilling Co.: : Holocene Drilling, Inc.

Drilling Method: : Push Probe Sampling Method: : Dual Tube

Borehole Diameter: : 3" Casing Diameter: : N/A Latitude : N/A Longitude : N/A Total Depth: : 15' bgs





BORING LOG EB32A

(Page 1 of 1)

Project No.: : 031447

Site: : ExxonMobil ADC, 2717/2731 Federal Avenue, Everett, WA

Logged By: : Paul Prevou

Reviewed By: : Keri Chappell, L.G. 2719
Signature: : Louch a pell

Date Drilled: : 01/27/21

Drilling Co.: : Holocene Drilling, Inc.

Drilling Method: : Push Probe Sampling Method: : Dual Tube

Borehole Diameter: : 3"

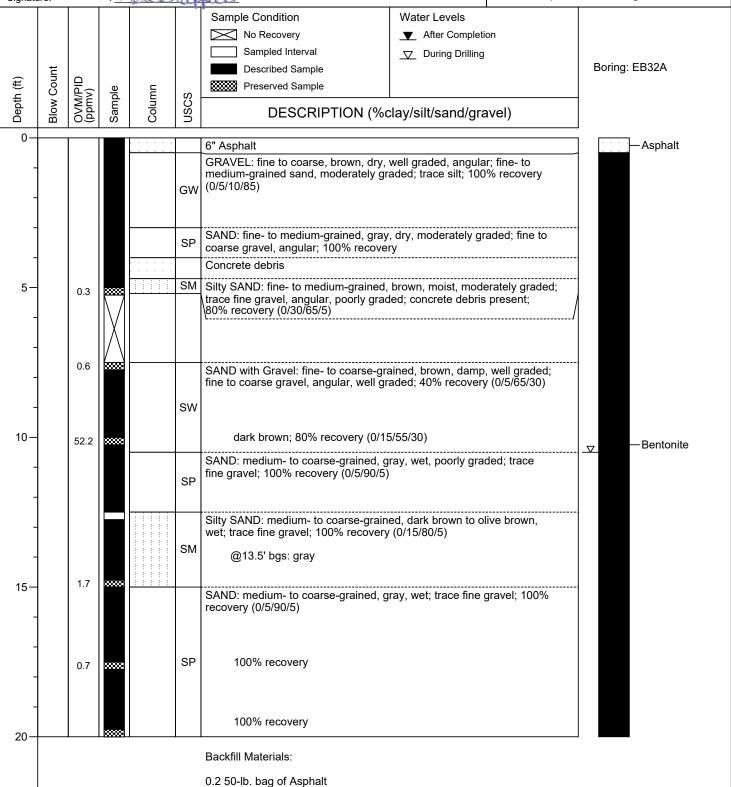
Casing Diameter: : N/A

Latitude : N/A

Longitude : N/A

Total Depth: : 20' bgs

First GW Depth: : 10.5' bgs



0.5 50-lb. bag of Bentonite Chips



(Page 1 of 1)

Project No.: : 031447

: ExxonMobil ADC, 2717/2731 Federal Avenue, Everett, WA

Logged By: : Paul Prevou

Reviewed By: : Keri Chappell, L.G. 2719 Date Drilled: : 01/25/21

Drilling Co.: : Holocene Drilling, Inc.

Drilling Method: : Push Probe Sampling Method: : Dual Tube

Borehole Diameter: : 3" Casing Diameter: : N/A Latitude : N/A Longitude : N/A Total Depth: : 20' bgs

: 12.5' bgs First GW Depth: Signature: howthappell Sample Condition Water Levels No Recovery ▼ After Completion Sampled Interval During Drilling Boring: EB33 **Described Sample Blow Count** OVM/PID (ppmv) Depth (ft) Preserved Sample Column Sample USCS DESCRIPTION (%clay/silt/sand/gravel) 0 6" Asphalt Asphalt Debris backfill 0.3 SAND: medium- to coarse-grained, brown, dry, well graded; fine to coarse gravel, subangular to subrounded; 100% recovery (0/0/90/10) SW 5 7.2 SAND with Gravel: medium- to coarse-grained, gray, moist; fine to coarse gravel, angular, poorly graded; trace silt; 100% recovery (0/5/60/35)SP 5.5 Silty SAND: fine-grained, moist, poorly graded; fine to coarse gravel, subangular, well graded; 100% recovery (0/20/70/10) 10 SM NAPL observed; 100% recovery 66.9 -Bentonite ∇ 37.4 SAND: medium- to coarse-grained, dark brown, wet, poorly graded; trace fine gravel, angular; NAPL observed; 100% recovery (0/10/85/5) SP 1.7 8888 15 SAND with Gravel: fine- to coarse-grained, black, wet, well graded; fine to coarse gravel, angular to subangular, well graded; NAPL observed; 100% recovery (0/10/55/35) SW NAPL observed; 100% recovery 9.5 SM | Silty SAND with Gravel: fine- to coarse-grained, black, wet, well 20 graded; fine to coarse gravel, poorly graded; 100% recovery (0/20/50/30)Backfill Materials: 0.2 50-lb. bag of Asphalt 0.5 50-lb. bag of Bentonite Chips



(Page 1 of 1)

Project No.: : 031447

Site: : ExxonMobil ADC, 2717/2731 Federal Avenue, Everett, WA

Logged By: : Paul Prevou

 Date Drilled: : 01/25/21

Drilling Co.: : Holocene Drilling, Inc.

Drilling Method: : Push Probe Sampling Method: : Dual Tube

Borehole Diameter: : 3"

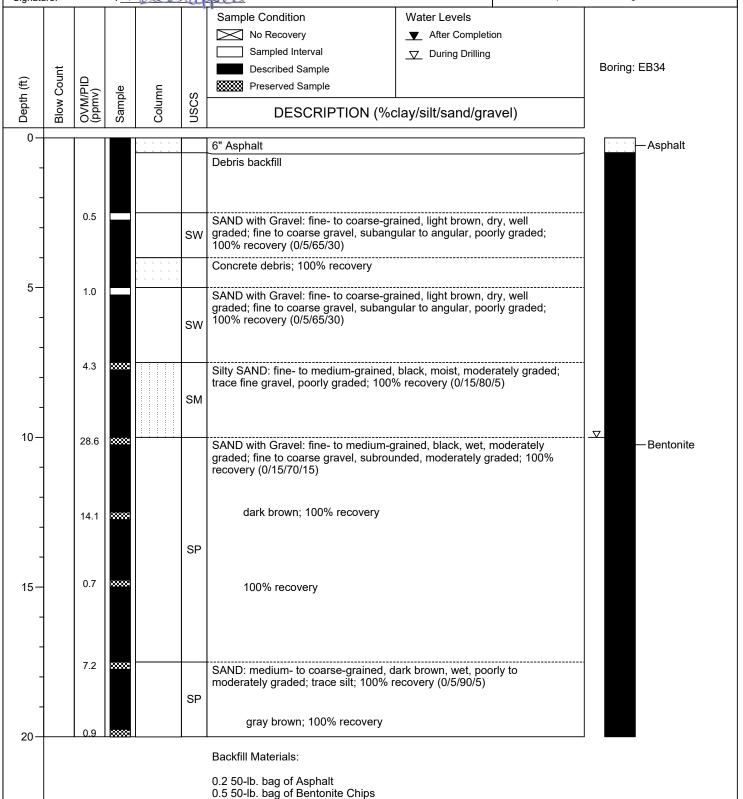
Casing Diameter: : N/A

Latitude : N/A

Longitude : N/A

Total Depth: : 20' bgs

First GW Depth: : 10' bgs





(Page 1 of 1)

Project No.: : 031447

Site: : ExxonMobil ADC, 2717/2731 Federal Avenue, Everett, WA

Logged By: : Paul Prevou

Reviewed By: : Keri Chappell, L.G. 2719
Signature: : Luchapell

Date Drilled: : 01/25/21

Drilling Co.: : Holocene Drilling, Inc.

Drilling Method: : Push Probe Sampling Method: : Dual Tube

Borehole Diameter: : 3"

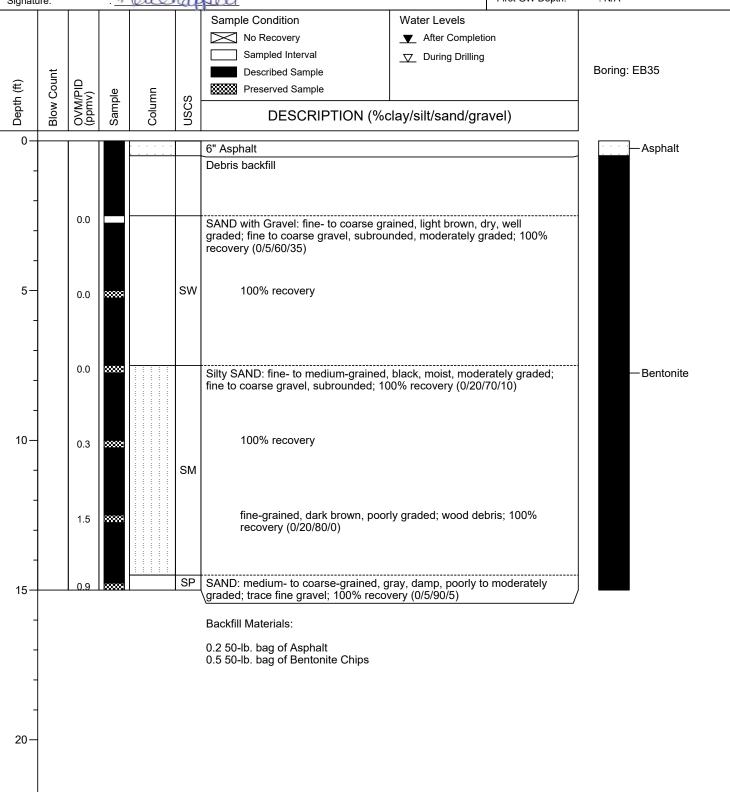
Casing Diameter: : N/A

Latitude : N/A

Longitude : N/A

Total Depth: : 15' bgs

First GW Depth: : N/A





(Page 1 of 1)

Project No.: : 031447

: ExxonMobil ADC, 2717/2731 Federal Avenue, Everett, WA

Logged By: : Paul Prevou

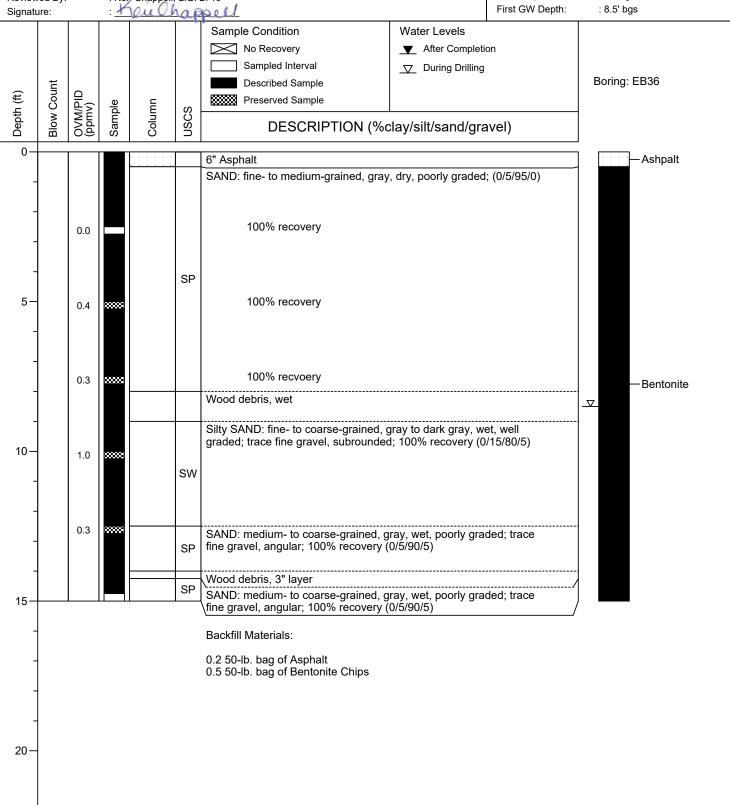
Reviewed By: : Keri Chappell, L.G. 2719 Date Drilled:

Drilling Co.: : Holocene Drilling, Inc.

: 01/26/21

: Push Probe Drilling Method: Sampling Method: : Dual Tube

Borehole Diameter: : 3" Casing Diameter: : N/A Latitude : N/A Longitude : N/A Total Depth: : 15' bgs





(Page 1 of 1)

Project No.: : 031447

: ExxonMobil ADC, 2717/2731 Federal Avenue, Everett, WA

Logged By: : Paul Prevou

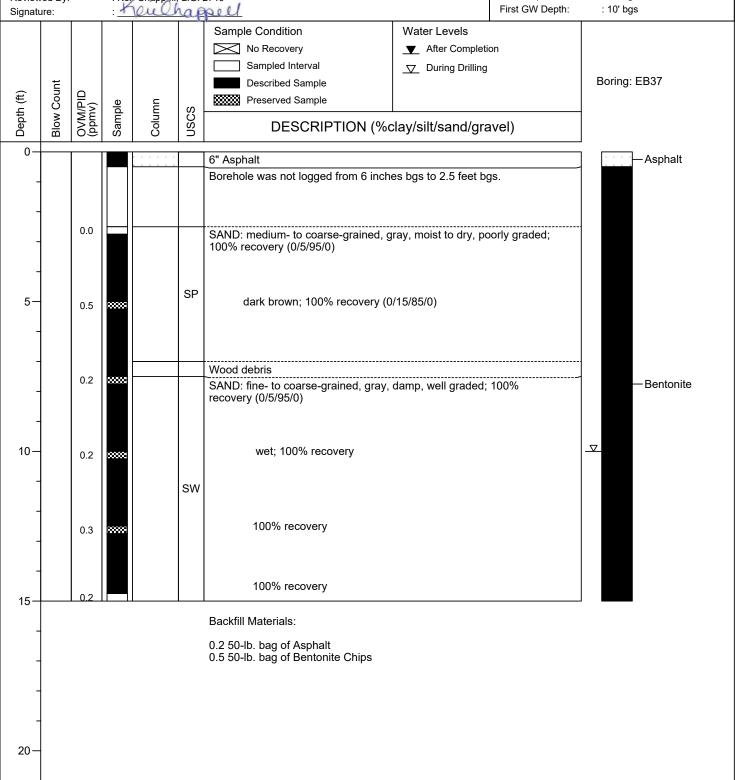
: Keri Chappell, L.G. 2719 : Hou happell Reviewed By:

Date Drilled: : 01/27/21

Drilling Co.: : Holocene Drilling, Inc.

Drilling Method: : Push Probe Sampling Method: : Dual Tube

Borehole Diameter: : 3" Casing Diameter: : N/A Latitude : N/A Longitude : N/A Total Depth: : 15' bgs





(Page 1 of 1)

Project No.: : 031447

Site: : ExxonMobil ADC, 2717/2731 Federal Avenue, Everett, WA

Logged By: : Paul Prevou

Reviewed By: : Keri Chappell, L.G. 2719
Signature: : Louch Bold

Date Drilled: : 01/ Drilling Co.: : Ho

Drilling Co.: : Holocene Drilling, Inc.

: 01/27/21

Drilling Method: : Push Probe Sampling Method: : Dual Tube

Borehole Diameter: : 3"

Casing Diameter: : N/A

Latitude : N/A

Longitude : N/A

Total Depth: : 15' bgs

First GW Depth: : N/A

Signatu	ıre:		1	roul	hai	pell		First GW Depth:	: N/A
Depth (ft)	Blow Count	OVM/PID (ppmv)	Sample	Column	nscs	Sample Condition No Recovery Sampled Interval Described Sample Preserved Sample DESCRIPTION (%c	Water Levels ▼ After Completi ▽ During Drilling Clay/silt/sand/gra		Boring: EB38
0				1					
						6" Asphalt			— Asphalt
-		2.7				Borehole was not logged from 6 inches			
5-		1.0	88888			100% recovery (0/5/95/0) 100% recovery			
-		0.5			SP	dark gray; 100% recovery			— Bentonite
- 10-		0.3	88888			black and dark gray; organics 100% recovery (0/10/90/0)	s and plant material	present;	
		0.2	2000			gray to dark gray; no organic recovery	s and plant material	l; 100%	
						\Wood debris, 2" layer		/	
15		6.9			SP	SAND: medium- to coarse-grained, g poorly graded; 100% recovery (0/10/	ray to dark gray, dry 90/0)	y to damp,	
.5						Backfill Materials:			
-						0.2 50-lb. bag of Asphalt 0.5 50-lb. bag of Bentonite Chips			
-									
-									
20-									



(Page 1 of 1)

Project No.: : 031447

: ExxonMobil ADC, 2717/2731 Federal Avenue, Everett, WA

Logged By: : Paul Prevou

Reviewed By: : Keri Chappell, L.G. 2719
Signature: : Loubhapell

Date Drilled: : 01/27/21

Drilling Co.: : Holocene Drilling, Inc.

Drilling Method: : Push Probe Sampling Method: : Dual Tube

Borehole Diameter: : 3"

Casing Diameter: : N/A

Latitude : N/A

Longitude : N/A

Total Depth: : 20' bgs

First GW Depth: : N/A

Sample Condition Water Levels No Recovery ▼ After Completion Sampled Interval During Drilling Boring: EB39 **Described Sample Blow Count** OVM/PID (ppmv) Depth (ft) Preserved Sample Column Sample USCS DESCRIPTION (%clay/silt/sand/gravel) 0 6" Asphalt Asphalt Borehole was not logged from 6 inches bgs to 2.5 feet bgs. 4.2 Concrete debris SAND: medium- to coarse-grained, brown, dry to damp, poorly graded; SP 100% recovery (0/5/95/0) Wood debris, 2" layer SAND: medium- to coarse-grained, gray, dry to damp, poorly graded; 5 12.7 100% recovery (0/10/90/0) SP dark gray, organic material present; 100% recovery 8.4 2000 Wood debris with brown clay, medium plasticity; 100% recovery 10 3.7 SAND: medium- to coarse-grained, dark gray, dry to damp, poorly -Bentonite graded; 100% recovery (0/10/90/0) SP 4.2 Wood debris with dark brown clay, medium plasticity; 100% recovery SAND: medium- to coarse-grained, gray, dry to damp, poorly graded; 100% recovery (0/10/90/0) 10.1 dark gray; 100% recovery 15 SP 100% recovery 0.7 Wood debris with brown clay, medium plasticity; intermittent coarse-grained sand; 100% recovery 20 SAND: medium- to coarse-grained, dark gray, dry to damp, poorly graded; 100% recovery (0/10/90/0) **Backfill Materials:** 0.2 50-lb. bag of Asphalt 0.5 50-lb. bag of Bentonite Chips



(Page 1 of 1)

Project No.: : 031447

: ExxonMobil ADC, 2717/2731 Federal Avenue, Everett, WA

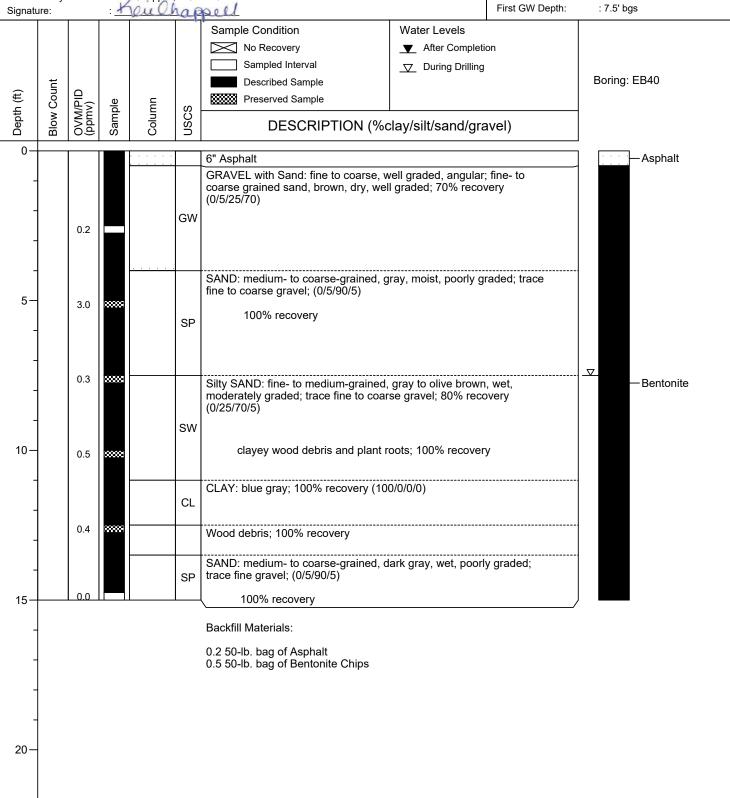
Logged By: : Paul Prevou

Reviewed By: : Keri Chappell, L.G. 2719 Date Drilled: : 01/26/21

Drilling Co.: : Holocene Drilling, Inc.

Drilling Method: : Push Probe Sampling Method: : Dual Tube

Borehole Diameter: : 3" Casing Diameter: : N/A Latitude : N/A Longitude : N/A Total Depth: : 15' bgs





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Project No.: : 031447

20

: ExxonMobil ADC, 2717/2731 Federal Avenue, Everett, WA

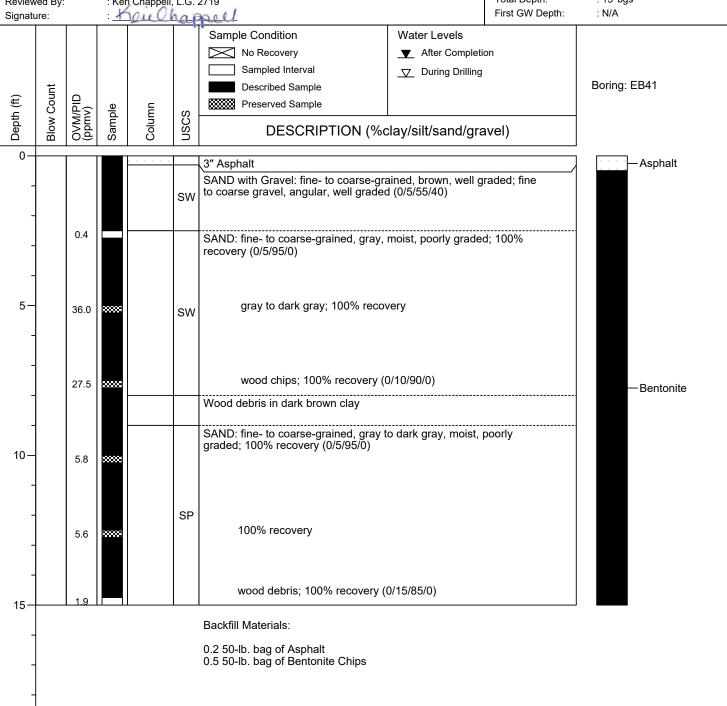
Logged By: : Paul Prevou

Reviewed By: : Keri Chappell, L.G. 2719 Date Drilled: : 01/27/21

: Holocene Drilling, Inc. Drilling Co.:

: Push Probe Drilling Method: Sampling Method: : Dual Tube

Borehole Diameter: : 3" Casing Diameter: : N/A Latitude : N/A Longitude : N/A Total Depth: : 15' bgs





(Page 1 of 1)

Date Drilled: : 01/26/21
Drilling Co.: : Holocene Drilling, Inc.

Drilling Method: : Push Probe
Sampling Method: : Dual Tube

Borehole Diameter: : 3"
Casing Diameter: : N/A
Latitude : N/A
Longitude : N/A
Total Depth: : 15' bgs

Project No.: : 031447

20

Site: : ExxonMobil ADC, 2717/2731 Federal Avenue, Everett, WA

Logged By: : Paul Prevou

Total Depth: Reviewed By: : Keri Chappell, L.G. 2719 First GW Depth: : 10' bgs Louthappell Signature: Sample Condition Water Levels No Recovery ▼ After Completion Sampled Interval During Drilling Boring: SB1 **Described Sample Blow Count** OVM/PID (ppmv) Depth (ft) 2000000 Preserved Sample Column Sample **USCS** DESCRIPTION (%clay/silt/sand/gravel) 0 3" Asphalt -Asphalt Debris backfill SAND with Gravel: fine- to coarse-grained, dark brown, moist, well 0.6 graded; fine to coarse gravel, subrounded, well graded; 100% recovery (0/15/45/40) SW light brown, trace cobbles; 100% recovery 5 0.1 0.4 Silty SAND with Gravel: fine- to coarse-grained, dark brown, moist, Bentonite well graded; fine gravel to cobbles, subrounded, well graded; 50% recovery (0/20/40/40) ∇ 10 SM fine- to medium-grained, gray/brown, wet; fine to coarse gravel, 0.2 subrounded and subangular; 50% recovery (0/25/40/35) 15.0 SAND with Gravel: fine- to coarse-grained, brown, wet, well graded; fine to coarse gravel, subangular and some subrounded; 100% recovery (0/10/60/30) SW medium- to coarse-grained, gray; fine to coarse gravel, poorly graded, subangular; 100% recovery (0/0/75/25) 15 **Backfill Materials:** 0.2 50-lb. bag of Asphalt 0.5 50-lb. bag of Bentonite Chips



(Page 1 of 1)

(Fage I t

: ExxonMobil ADC, 2717/2731 Federal Avenue, Everett, WA

Logged By: : Paul Prevou

Project No.:

Reviewed By: : Keri Chappell, L.G. 2719 Signature: : You chappell

: 031447

Date Drilled: : 01/26/21

Drilling Co.: : Holocene Drilling, Inc.

Drilling Method: : Push Probe Sampling Method: : Dual Tube

Borehole Diameter: : 3"

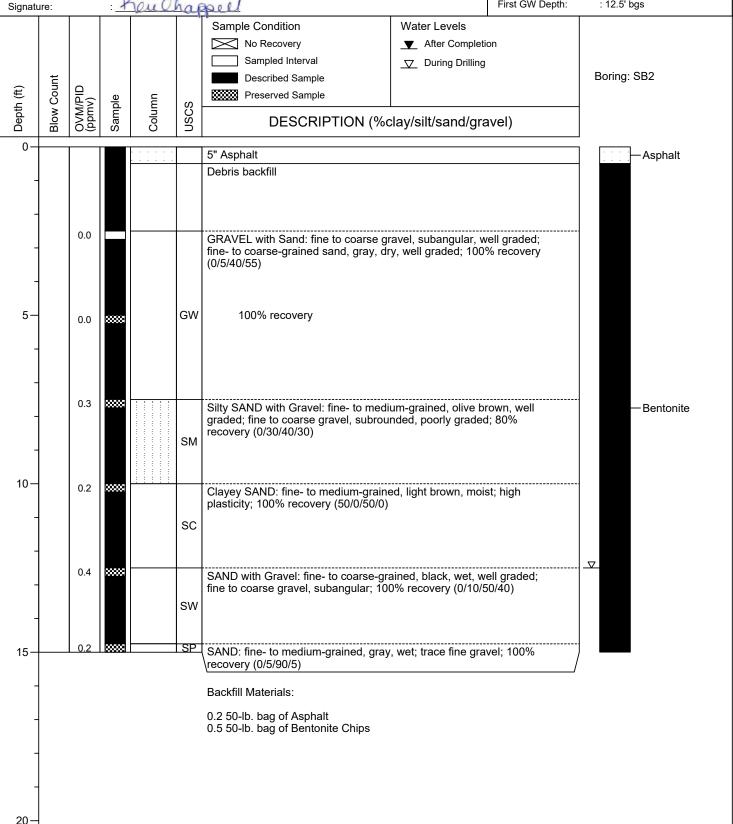
Casing Diameter: : N/A

Latitude : N/A

Longitude : N/A

Total Depth: : 15' bgs

First GW Depth: : 12.5' bgs





Project No.:

BORING LOG SB3

(Page 1 of 1)

Date Drilled: : 01/26/21

Drilling Co.: : Holocene Drilling, Inc. : Push Probe Drilling Method:

: 10' bgs

Boring: SB3

Sampling Method: : Dual Tube Borehole Diameter: : 3" Casing Diameter: : N/A Latitude : N/A Longitude : N/A Total Depth: : 20' bgs

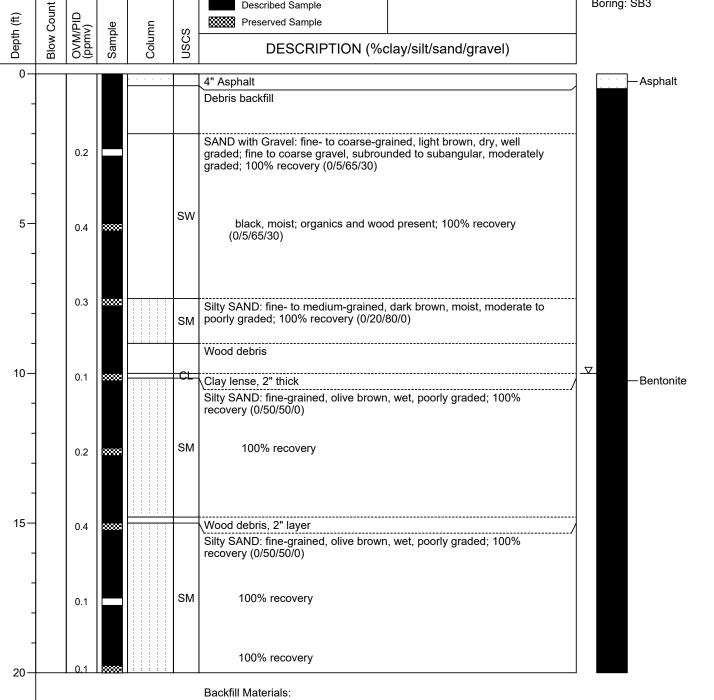
First GW Depth:

Logged By: : Paul Prevou Reviewed By: : Keri Chappell, L.G. 2719 Keulhappell Signature:

: 031447

Sample Condition Water Levels No Recovery ▼ After Completion Sampled Interval During Drilling **Described Sample**

: ExxonMobil ADC, 2717/2731 Federal Avenue, Everett, WA



0.2 50-lb. bag of Asphalt

0.5 50-lb. bag of Bentonite Chips



Project No.:

BORING LOG SB4

(Page 1 of 1)

Date Drilled: : 01/25/21

Drilling Co.: : Holocene Drilling, Inc.

Drilling Method: : Push Probe Sampling Method: : Dual Tube

Borehole Diameter: : 3" Casing Diameter: : N/A Latitude : N/A Longitude : N/A Total Depth: : 20' bgs First GW Depth: : 10' bgs

Logged By: : Paul Prevou : Keri Chappell, L.G. 2719 : Howhapell Reviewed By: Signature:

: 031447

: ExxonMobil ADC, 2717/2731 Federal Avenue, Everett, WA

Sample Condition Water Levels No Recovery ▼ After Completion Sampled Interval During Drilling Boring: SB4 **Described Sample Blow Count** OVM/PID (ppmv) Depth (ft) Preserved Sample Column Sample **USCS** DESCRIPTION (%clay/silt/sand/gravel) 0 6" Asphalt Asphalt Debris backfill 0.0 SAND: fine- to coarse-grained, brown, dry; fine to coarse gravel, subangular; 80% recovery (0/5/85/10) SW wood debris 5 0.2 SAND: coarse-grained, gray, dry, poorly graded; trace fine gravel; 100% recovery (0/5/90/5) SP 0.4 ∇ 10 28.9 SAND with Gravel: fine- to medium-grained, brown, wet, poorly -Bentonite graded; fine to coarse gravel, poorly graded, subrounded; trace silt; 30% recovery (0/5/50/45) SP 24.5 SAND: medium-grained, black, wet, poorly graded; 100% recovery SP 15 medium- to coarse-grained, trace medium gravel, 14.6 subrounded; 100% recovery 12.2 Silty SAND: medium- to coarse-grained, black, wet, moderate to poorly graded; trace fine gravel; 100% recovery (0/20/75/5) SM SAND with Gravel: medium- to coarse-grained, gray, wet, moderately 20 graded; fine to coarse gravel, poorly graded, subangular; 100% recovery (0/5/65/30) **Backfill Materials:** 0.2 50-lb. bag of Asphalt 0.5 50-lb. bag of Bentonite Chips



(Page 1 of 1)

Date Drilled: : 01/26/21

Drilling Co.: : Holocene Drilling, Inc.

Drilling Method: : Push Probe Sampling Method: : Dual Tube

Borehole Diameter: : 3" Casing Diameter: : N/A Latitude : N/A Longitude : N/A Total Depth: : 20' bgs

Project No.:

: ExxonMobil ADC, 2717/2731 Federal Avenue, Everett, WA

Logged By: : Paul Prevou

: Keri Chappell, L.G. 2719 : Houshappell Reviewed By:

: 031447

First GW Depth: : 8' bgs Signature: Sample Condition Water Levels No Recovery After Completion Sampled Interval During Drilling Boring: SB5 **Described Sample Blow Count** OVM/PID (ppmv) Depth (ft) Preserved Sample Column Sample **USCS** DESCRIPTION (%clay/silt/sand/gravel) 0 2" Asphalt Asphalt Debris backfill SAND with Gravel: fine- to coarse-grained, light brown, dry, well 0.4 graded; fine gravel, subangular, moderately graded; 100% recovery (0/5/60/35) 5 100% recovery 0.7 100% recovery 0.4 ∇ wet SW 10 dark brown; 100% recovery (0/10/60/30) 0.2 -Bentonite 100% recovery (0/15/55/30) 0.2 15 0.1 Silty SAND with Gravel: fine- to coarse-grained, black, wet, well graded; fine gravel, subangular, moderately graded; 100% recovery (0/20/55/25) SM 0.5 Silty SAND: fine-grained, black, damp, poorly graded; trace organic matter; 100% recovery (0/30/70/0) SM SAND: medium- to coarse-grained, brown, damp, poorly graded; trace 20 fine gravel; 100% recovery (0/5/90/5) **Backfill Materials:**

0.2 50-lb. bag of Asphalt 0.5 50-lb. bag of Bentonite Chips



(Page 1 of 1)

Project No.: : 031447

: ExxonMobil ADC, 2717/2731 Federal Avenue, Everett, WA

Logged By: : Paul Prevou

Reviewed By: : Keri Chappell, L.G. 2719 Keulhappell Signature:

Date Drilled: : 02/05/21

Drilling Co.: : Holocene Drilling, Inc.

Drilling Method: : Push Probe Sampling Method: : Dual Tube

Borehole Diameter: : 3" Casing Diameter: : N/A Latitude : N/A Longitude : N/A Total Depth: : 15' bgs

: 7.5' bgs First GW Depth: Sample Condition Water Levels No Recovery ▼ After Completion Sampled Interval During Drilling Boring: SB6 **Described Sample Blow Count** OVM/PID (ppmv) Depth (ft) Preserved Sample Column Sample **USCS** DESCRIPTION (%clay/silt/sand/gravel) 5" Asphalt Asphalt Borehole was not logged from 6 inches bgs to 2.5 feet bgs. 3.5 SAND with Gravel: fine- to coarse-grained, black to dark brown, moist, moderately graded; fine to coarse gravel, rounded to subangular, well graded; 100% recovery (0/5/60/35) SW 5 0.3 Silty SAND: very fine- to medium-grained, gray, moist; 100% recovery (0/30/70/0)SM ∇ fine- to coarse-grained, bimodal primarily 0.1 2000 Bentonite coarse-grained, brown, wet, low plasticity; trace fine gravel; 100% recovery (0/20/75/5) Wood debris with brown clay, dry to moist, roots 10 0.1 0.0 SAND: medium- to coarse-grained, gray, wet, poorly graded; 100% recovery (0/5/95/0) SP CLAY with Sand: dark brown, moist, high plasticity; fine-grained sand, 15 poorly graded; 100% recovery (85/0/15/0) **Backfill Materials:** 0.2 50-lb. bag of Asphalt 0.5 50-lb. bag of Bentonite Chips 20



(Page 1 of 1)

Project No.: : 031447

Site: : ExxonMobil ADC, 2717/2731 Federal Avenue, Everett, WA

Logged By: : Paul Prevou

Date Drilled: : 02/05/21

Drilling Co.: : Holocene Drilling, Inc.

Drilling Method: : Push Probe Sampling Method: : Dual Tube

 Borehole Diameter:
 : 3"

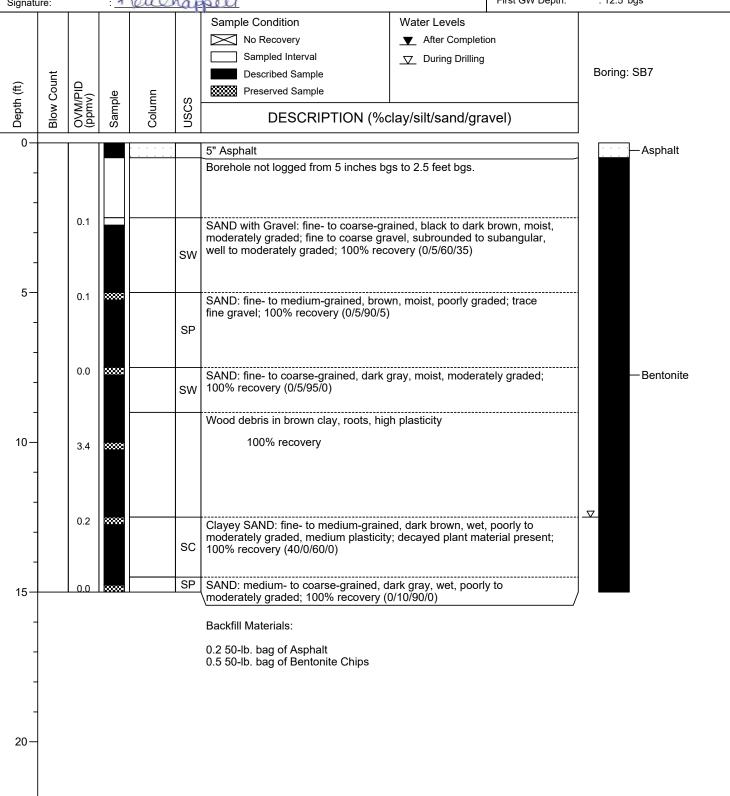
 Casing Diameter:
 : N/A

 Latitude
 : N/A

 Longitude
 : N/A

 Total Depth:
 : 15' bgs

 First GW Depth:
 : 12.5' bgs





(Page 1 of 1)

Date Drilled: : 01/27/21

Drilling Co.: : Holocene Drilling, Inc. Drilling Method: : Hollow-Stem Auger

Sampling Method: : Split Spoon

Borehole Diameter: : 8" Casing Diameter: : N/A Latitude : N/A Longitude : N/A Total Depth: : 31.5' bgs

Project No.: : 031447

: ExxonMobil ADC, 2717/2731 Federal Avenue, Everett, WA

Logged By: : Brett McLees

Reviewed By: : Keri Chappell, L.G. 2719 howthappell

First GW Depth: : 9' bgs Signature: Sample Condition Water Levels No Recovery ▼ After Completion Sampled Interval During Drilling Boring: GB1 **Described Sample Blow Count** OVM/PID (ppmv) Depth (ft) 2000000 Preserved Sample Column Sample **USCS** DESCRIPTION (%clay/silt/sand/gravel) 0 3" Asphalt Concrete Borehole was cleared to 5' bgs on 01/26/21 using air knife and hand tools. Borehole was not logged from 3 inches bgs to 5 feet bgs. Bentonite (Estimate) 5 6 12 13 Fill: fine- to coarse-grained sand matrix, brown/gray, damp, rounded, well graded, thin bed; 80% wood debris; 100% recovery (0/0/20/0) cuttings saturated ∇ 10 gray, wet; 50% wood debris; 100% recovery (0/0/50/0) 9 14 14 100% recovery 15 6 8 4 Collapsed Material (Estimate) 20 1 2 3 CLAY: brown (100/0/0/0) CL SAND: fine- to coarse-grained, gray, wet, rounded, thin bed; 100% recovery (0/0/100/0) 25 100% recovery 123 SW 30 100% recovery Geotechnical Information: Truck-mounted rig No. 113, Diedrich D-120, 140-pound Auto Hammer Certification complete on November 19, 2020. Borehole collapsed during backfill activities due to high water table. 35 Bottom of bentonite calulated via Cetco 3/8" Crumble standard volume. **Backfill Materials:** 2 50-lb. bags of Cement 1 50-lb. bag of Bentonite Chips 40



(Page 1 of 1)

: ExxonMobil ADC, 2717/2731 Federal Avenue, Everett, WA

Logged By: : Brett McLees

Project No.:

Reviewed By: : Keri Chappell, L.G. 2719

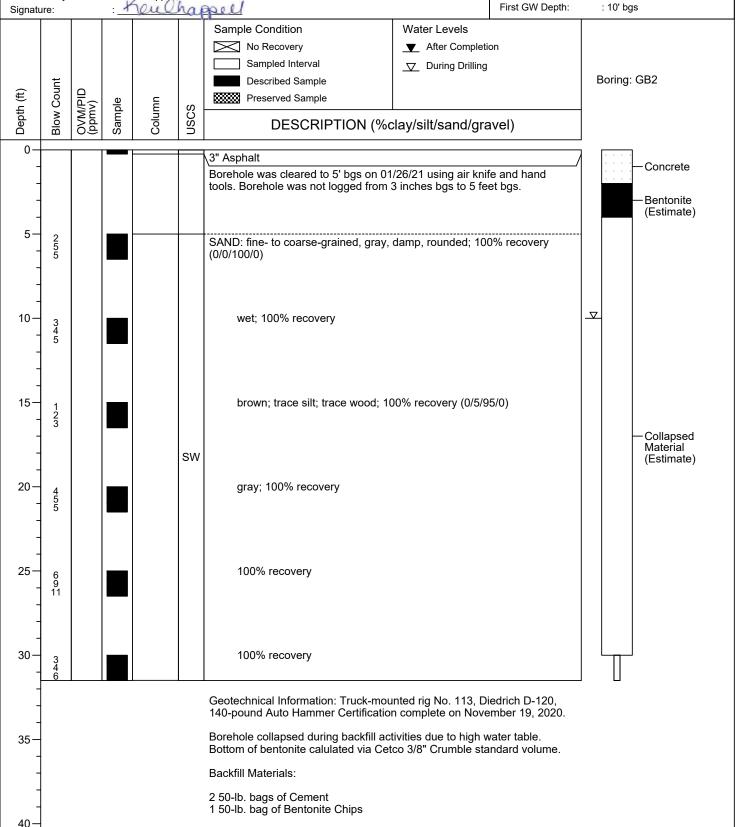
: 031447

Date Drilled: : 01/27/21

Drilling Co.: : Holocene Drilling, Inc. Drilling Method: : Hollow-Stem Auger

Sampling Method: : Split Spoon

Borehole Diameter: : 8" Casing Diameter: : N/A Latitude : N/A Longitude : N/A Total Depth: : 31.5' bgs



ExxonMobil ADC Cardno 03144702.R04

APPENDIX D WASTE DOCUMENTATION

F	onn designed for use on elite (12-pitch) typewriter	r) C	3705	1200861										
1	NON-HAZARDOUS WASTE MANIFEST 1. Generator ID VSOG) Number		3. Emergency Respon		4. Weste Tracking Number								
П	5. Generator's Name and Mailing Address		1	888-785-		279650/D341718								
	ExenMobil Oil Corporation, c/c 801 Second Avenue Suits 115 Seattle, WA 98104 Generator's Phone:	o Cardno 0		Generator's Site Addre ExconMobil Oil C 2717 Federal Av Everett, WA 9820	orporatio	than mailing addr	ess)							
	Transporter 1 Company Name Advanced Chemical Transport	Inc./DBA ACTenviro				U.S. EPA ID	Number	CARO	00070	1540				
	7. Transporter 2 Company Name					U.S. EPA ID	Number	O. A.C.O	00070	J-10				
	8. Designated Facility Name and Site Address US Ecology Idaho Inc Site B 20400 Lemiey Rd Grandwew, ID 83624 Facility's Phone 208-834-2275					U.S. EPA ID	Number	IDD0	73114	654				
	9. Waste Shipping Name and Description			10. Con	9900000	11. Total Quantity	12. Unit Wt./Vol.							
GENERATOR -	¹ Non-RCRA/Non-DOT Re CUTTINGS)	gulated Material Solid (SOIL		2	Type DM	75 _D	P							
- GENE	(GROUNDWATER)	gulated Material Liquid		14	DM	7,000	P							
	3.								*					
	4.													
	1) 52930-0 EXU-A2-51 2) 000052916-0 EXU-A2-5			to forfered secure for										
	Generator's/Offeror's Printed/Typed Name		Sign	ature				Month	27	Year				
1	Brett McLes on behalf of		Export from U.	S. Port of e		of Extra	Mahil	02	19	21				
Z K	Transporter Signature (for exports only): 16. Transporter Acknowledgment of Receipt of Ma		Square mann g.	Date leav	,									
NSPORTE	Transporter 1 Printed/Typed Name Transporter 1 Printed/Typed Name			ature		2.		Month	Day 19	Year 2				
- 176	17. Discrepancy		Olgrid	ature				Month	Day	Year				
Ì	17a. Discrepancy Indication Space Quant	ity Type		Residue		Partial Reje	clion		Full Reject	tion				
	17b. Alternate Facility (or Generator)			Manifest Reference N	lumber:	U.S. EPA ID N	lumber							
DE LAC	Facility's Phone: 17c. Signature of Alternate Facility (or Generator)							Month	Dov	Voor				
מומוסוס								INDUM	Day	Year				
2	19. Decimated Codility Owner or Occasion Co. 19	ation of resoluted with the												
1	18. Designated Facility Owner or Operator: Certifical Printed/Typed Name		nifest except a Signa	ture				Month	Day	Year				
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Cardno is an ASX-200 professional infrastructure and environmental services company, with expertise in the development and improvement of physical and social infrastructure for communities around the world. Cardno's team includes leading professionals who plan, design, manage, and deliver sustainable projects and community programs. Cardno is an international company listed on the Australian Securities Exchange [ASX:CDD].

Cardno Zero Harm



At Cardno, our primary concern is to develop and maintain safe and healthy conditions for anyone involved at our project worksites. We require full compliance with our Health and Safety Policy Manual and established work procedures and expect the same protocol from our subcontractors. We are committed to achieving our Zero Harm goal by continually improving our safety systems, education, and vigilance at the workplace and in the field.

Safety is a Cardno core value and through strong leadership and active employee participation, we seek to implement and reinforce these leading actions on every job, every day.





3322 South Bay Road NE • Olympia, WA 98506-2957

February 25, 2021

Robert Thompson Cardno 801 Second Ave, Suite 700 Seattle, Washington 98104

Dear Mr. Thompson:

Please find enclosed the analytical data report for the Port of Everett Project located in Everett, Washington.

The results of the analyses are summarized in the attached tables. Applicable detection limits and QA/QC data are included. The sample(s) will be disposed of in 30 days unless we are contacted to arrange long term storage.

Libby Environmental, Inc. appreciates the opportunity to have provided analytical services for this project. If you have any further questions about the data report, please give me a call. It was a pleasure working with you on this project, and we are looking forward to the next opportunity to work together.

Sincerely,

Sherry L. Chilcutt Senior Chemist

Libby Environmental, Inc.

Libby Environm	nental,	Inc.		, Ch	nain o	f Cu	ısto	dy R	eco	ord							www.L	.lbbyErwir	ronmental.com
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PORT OF EVERETT PROJECT Cardno Everett, Washington Libby Project # L201012-10 Client Project # 031447 3322 South Bay Road NE Olympia, WA 98506 Phone: (360) 352-2110 FAX: (360) 352-4154 Email: libbyenv@gmail.com

Analyses of Gasoline (NWTPH-Gx) in Soil

Sample	Date	Date	Dilution	Surrogate	Gasoline
Number	Collected	Analyzed		Recovery (%)	(mg/kg)
Method Blank	N/A	10/12/2020		96%	nd
S-2.5-EB5	10/12/2020	10/12/2020		96%	nd
S-5-EB5	10/12/2020	10/12/2020		95%	nd
S-7.5-EB5	10/12/2020	10/12/2020		96%	nd
S-10-EB5	10/12/2020	10/12/2020		97%	nd
S-5-EB6	10/12/2020	10/12/2020		97%	nd
S-10-EB6	10/12/2020	10/12/2020		95%	nd
S-10-EB6 Dup	N/A	10/12/2020		95%	nd
S-5-EB4	10/12/2020	10/12/2020		103%	18
S-7.5-EB4	10/12/2020	10/12/2020	10	93%	<100
S-10-EB4	10/12/2020	10/12/2020	10	97%	<100
S-12.5-EB4	10/12/2020	10/12/2020	5	100%	< 50
S-15-EB4	10/12/2020	10/12/2020		96%	nd
S-15-EB4 Dup	N/A	10/12/2020		95%	nd
S-5-EB3	10/12/2020	10/12/2020		95%	nd
S-10-EB3	10/12/2020	10/12/2020	5	98%	< 50
S-12.5-EB3	10/12/2020	10/12/2020	5	97%	< 50
S-15-EB3	10/12/2020	10/12/2020		95%	nd
Practical Quantitation Limit					10

[&]quot;<" Indicates elevated PQL due to dilution.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE (Toluene-d8): 65% TO 135%

[&]quot;nd" Indicates not detected at the listed detection limits.

[&]quot;int" Indicates that interference prevents determination.

PORT OF EVERETT PROJECT
Cardno
Everett, Washington
Libby Project # L201012-10

Client Project # 031447

3322 South Bay Road NE

Olympia, WA 98506 Phone: (360) 352-2110

FAX: (360) 352-4154

Email: libbyenv@gmail.com

Analyses of Diesel & Oil (NWTPH-Dx/Dx Extended) in Soil with Silica Gel Clean-up

C1-	D-4-	D-4-	D:14:	C	D:1	0:1
Sample	Date	Date	Dilution	Surrogate	Diesel	Oil
Number	Collected	Analyzed		Recovery (%)	(mg/kg)	(mg/kg)
Method Blank	N/A	10/12/2020		107	nd	nd
S-2.5-EB5	10/12/2020	10/12/2020		108	nd	nd
S-5-EB5	10/12/2020	10/12/2020		104	nd	nd
S-7.5-EB5	10/12/2020	10/12/2020		108	nd	nd
S-10-EB5	10/12/2020	10/12/2020		113	51	nd
S-2.5-EB6	10/12/2020	10/12/2020		104	nd	nd
S-5-EB6	10/12/2020	10/12/2020		110	nd	nd
S-5-EB6 Dup	N/A	10/12/2020		110	nd	nd
S-7.5-EB6	10/12/2020	10/12/2020		83	nd	nd
S-10-EB6	10/12/2020	10/12/2020		80	nd	nd
S-5-EB4	10/12/2020	10/12/2020		int	4700	nd
S-7.5-EB4	10/12/2020	10/13/2020	10	int	36000	nd
S-10-EB4	10/12/2020	10/12/2020		int	5500 E	nd
S-12.5-EB4	10/12/2020	10/12/2020		int	4400	nd
S-12.5-EB4 Dup	N/A	10/12/2020		int	3300	nd
S-15-EB4	10/12/2020	10/12/2020		80	nd	nd
S-5-EB3	10/12/2020	10/12/2020		90	nd	nd
S-7.5-EB3	10/12/2020	10/12/2020	10	int	43000	nd
S-10-EB3	10/12/2020	10/12/2020	5	int	15000	nd
S-12.5-EB3	10/12/2020	10/12/2020		113	188	nd
S-15-EB3	10/12/2020	10/12/2020		79	nd	nd
Practical Quantita	tion Limit				50	250

[&]quot;E" Indicates reported result is an estimate because it exceeds the calibration range.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE (2-F Biphenyl): 65% TO 135%

[&]quot;nd" Indicates not detected at the listed detection limits.

[&]quot;int" Indicates that interference prevents determination.

PORT OF EVERETT PROJECT Cardno Everett, Washington Libby Project # L201012-10 Client Project # 031447 3322 South Bay Road NE Olympia, WA 98506 Phone: (360) 352-2110 FAX: (360) 352-4154 Email: libbyenv@gmail.com

CCV Gasoline by NWTPH-Gx in Soil

Sample	Date	Gasoline	CCV Recovery	CCV Recovery Limits
Number	Analyzed	(mg/kg)	(%)	(%)
CCV Rv1 50 ppm	10/12/2020	48.3	97%	80-120%
Practical Quantitation Limit		10		

PORT OF EVERETT PROJECT Cardno Everett, Washington Libby Project # L201012-10 Client Project # 031447 3322 South Bay Road NE Olympia, WA 98506 Phone: (360) 352-2110 FAX: (360) 352-4154

Email: libbyenv@gmail.com

CCV Diesel by NWTPH-Dx in Soil

Sample	Date	Diesel	CCV Recovery	CCV Recovery Limits
Number	Analyzed	(mg/kg)	(%)	(%)
CCV Nova Scotia FID 1 500 ppm	10/12/2020	533	107%	85-115%
CCV Nova Scotia FID 2 500 ppm	10/12/2020	438	88%	85-115%
CCV Nova Scotia FID 1 500 ppm	10/13/2020	572	114%	85-115%
CCV Nova Scotia FID 2 500 ppm	10/13/2020	548	110%	85-115%
Practical Quantitation Limit		50		

Libby Environm	nental,	Inc.		, Ch	nain	O	Cu	sto	ody F	Rec	or	d							www.Llb	byEnviron	mental.com
3322 South Bay Road NE Olympia, WA 98506		360-352-4 360-352-4		lympia		a	Bate:	1	10/12/	20						Page	e:	1		of	1
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City:		State:	Zip	:			Locatio	on:	Evere	H						City,	Stat	ie:	WA		
Phone:		Fax:							Paul			va		- "		Date	of C	offec	ction: 10	1/12/20	
Client Project # 031447							Email:														
Sample Number	Depth	Time	Sample Type	Container Type	/5º/	\$ 15 M		100 Page 1	HALL SE	ST ST ST ST ST ST ST ST ST ST ST ST ST S	24 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	My ago	Nada Add	2000	3. QC	200			The state of the s	td turn	For All
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65-215-EB4	2.5	1775	.5			X			X												
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8 5-7-5- EB3	7.5	1315	5			0			,			Ш							GX	only	
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115-7,5-EBIL	7.5	1415	5			X		4	X			Ш			Ш						
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PORT OF EVERETT PROJECT Cardno Everett, Washington Libby Project # L201012-3

Client Project # 031447

3322 South Bay Road NE Olympia, WA 98506

Phone: (360) 352-2110 FAX: (360) 352-4154

Email: libbyenv@gmail.com

Analyses of Gasoline (NWTPH-Gx) in Soil

Sample	Date	Date	Dilution	Surrogate	Gasoline
Number	Collected	Analyzed		Recovery (%)	(mg/kg)
Method Blank	N/A	10/15/2020		89%	nd
Method Blank	N/A	10/14/2020		89%	nd
S-5-EB7	10/12/2020	10/15/2020		92%	nd
S-7.5-EB7	10/12/2020	10/15/2020		86%	nd
S-7.5-EB7 Dup	N/A	10/15/2020		83%	nd
S-10-EB7	10/12/2020	10/14/2020		105%	nd
S-2.5-EB6	10/12/2020	10/15/2020		98%	nd
S-7.5-EB6	10/12/2020	10/15/2020		100%	nd
S-2.5-EB4	10/12/2020	10/14/2020		105%	nd
S-2.5-EB3	10/12/2020	10/14/2020		93%	nd
S-2.5-EB3 Dup	N/A	10/14/2020		98%	nd
S-7.5-EB3	10/12/2020	10/15/2020	10	95%	<100
S-2.5-EB11	10/12/2020	10/14/2020		134%	nd
S-5-EB11	10/12/2020	10/15/2020	10	82%	<100
S-7.5-EB11	10/12/2020	10/15/2020	10	75%	<100
S-10-EB11	10/12/2020	10/15/2020	10	84%	<100
S-12.5-EB11	10/12/2020	10/15/2020		95%	nd
S-15-EB11	10/12/2020	10/15/2020		88%	nd
Practical Quantitation Limit					10

[&]quot;nd" Indicates not detected at the listed detection limits.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE (Trifluorotoluene): 65% TO 135%

ANALYSES PERFORMED BY: Melissa Harrington

[&]quot;int" Indicates that interference prevents determination.

[&]quot;<" Indicates elevated PQL due to dilution.

PORT OF EVERETT PROJECT Cardno Everett, Washington Libby Project # L201012-3

Client Project # 031447

FAX: (360) 352-4154 Email: libbyenv@gmail.com

3322 South Bay Road NE

Olympia, WA 98506

Phone: (360) 352-2110

Analyses of Diesel & Oil (NWTPH-Dx/Dx Extended) in Soil with Silica Gel Clean-up

Date	I lota				
	Date	Dilution	Surrogate	Diesel	Oil
Collected	Analyzed		Recovery (%)	(mg/kg)	(mg/kg)
N/A	10/13/2020		107	nd	nd
N/A	10/15/2020		125	nd	nd
N/A	10/16/2020		103	nd	nd
/12/2020	10/13/2020		127	nd	nd
/12/2020	10/13/2020		100	74	nd
/12/2020	10/13/2020		134	nd	nd
/12/2020	10/13/2020		121	nd	nd
/12/2020	10/13/2020		94	nd	nd
/12/2020	10/13/2020		135	nd	550
/12/2020	10/15/2020		108	2400	nd
/12/2020	10/16/2020	10	119	44000	2700
/12/2020	10/16/2020	3	114	11000	1300
/12/2020	10/15/2020		122	370	nd
N/A	10/15/2020		123	480	nd
/12/2020	10/15/2020		125	nd	nd
n I imit				50	250
	N/A N/A N/A /12/2020 /12/2020 /12/2020 /12/2020 /12/2020 /12/2020 /12/2020 /12/2020 /12/2020 N/A	N/A 10/13/2020 N/A 10/15/2020 N/A 10/16/2020 /12/2020 10/13/2020 /12/2020 10/13/2020 /12/2020 10/13/2020 /12/2020 10/13/2020 /12/2020 10/13/2020 /12/2020 10/13/2020 /12/2020 10/13/2020 /12/2020 10/15/2020 /12/2020 10/16/2020 /12/2020 10/15/2020 /12/2020 10/15/2020 N/A 10/15/2020 /12/2020 10/15/2020	N/A 10/13/2020 N/A 10/15/2020 N/A 10/16/2020 /12/2020 10/13/2020 /12/2020 10/13/2020 /12/2020 10/13/2020 /12/2020 10/13/2020 /12/2020 10/13/2020 /12/2020 10/13/2020 /12/2020 10/15/2020 /12/2020 10/16/2020 10 /12/2020 10/16/2020 3 /12/2020 10/15/2020 N/A 10/15/2020 /12/2020 10/15/2020	N/A 10/13/2020 107 N/A 10/15/2020 125 N/A 10/16/2020 103 /12/2020 10/13/2020 127 /12/2020 10/13/2020 100 /12/2020 10/13/2020 134 /12/2020 10/13/2020 121 /12/2020 10/13/2020 94 /12/2020 10/13/2020 135 /12/2020 10/15/2020 108 /12/2020 10/16/2020 10 119 /12/2020 10/16/2020 3 114 /12/2020 10/15/2020 122 N/A 10/15/2020 123 /12/2020 10/15/2020 125	N/A 10/13/2020 107 nd N/A 10/15/2020 125 nd N/A 10/16/2020 103 nd /12/2020 10/13/2020 127 nd /12/2020 10/13/2020 100 74 /12/2020 10/13/2020 134 nd /12/2020 10/13/2020 121 nd /12/2020 10/13/2020 121 nd /12/2020 10/13/2020 94 nd /12/2020 10/13/2020 135 nd /12/2020 10/13/2020 108 2400 /12/2020 10/15/2020 10 119 44000 /12/2020 10/16/2020 3 114 11000 /12/2020 10/15/2020 122 370 N/A 10/15/2020 123 480 /12/2020 10/15/2020 125 nd

[&]quot;nd" Indicates not detected at the listed detection limits.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE (2-F Biphenyl): 65% TO 135%

ANALYSES PERFORMED BY: Kory Dixon and Jenny Anderson

[&]quot;int" Indicates that interference prevents determination.

PORT OF EVERETT PROJECT Cardno Everett, Washington Libby Project # L201013-10 Client Project # 031447 3322 South Bay Road NE Olympia, WA 98506 Phone: (360) 352-2110 FAX: (360) 352-4154 Email: libbyenv@gmail.com

CCV Gasoline by NWTPH-Gx in Soil

Sample	Date	Gasoline	CCV Recovery	CCV Recovery Limits
Number	Analyzed	(mg/kg)	(%)	(%)
CCV Yahtzee PID 1 50 ppm	10/14/2020	46.6	93%	80-120%
CCV Yahtzee PID 1 50 ppm	10/15/2020	45.3	91%	80-120%
Practical Quantitation Limit		10		

ANALYSES PERFORMED BY: Melissa Harrington

PORT OF EVERETT PROJECT Cardno Everett, Washington Libby Project # L201013-10 Client Project # 031447 3322 South Bay Road NE Olympia, WA 98506 Phone: (360) 352-2110 FAX: (360) 352-4154 Email: libbyenv@gmail.com

CCV Diesel by NWTPH-Dx in Soil

Sample	Date	Diesel	CCV Recovery	CCV Recovery Limits
Number	Analyzed	(mg/kg)	(%)	(%)
CCV Stella FID 1 500 ppm	10/13/2020	546	109%	85-115%
CCV Stella FID 2 500 ppm	10/13/2020	522	104%	85-115%
CCV Stella FID 3 500 ppm	10/13/2020	464	93%	85-115%
CCV Kilvan FID 1 500 ppm	10/15/2020	441	88%	85-115%
CCV Kilvan FID 1 500 ppm	10/16/2020	430	86%	85-115%
- -				
Practical Quantitation Limit		50		

ANALYSES PERFORMED BY: Kory Dixon and Jenny Anderson

Libby Environmental, Inc. Chain of Custody Record														www.	LibbyEnv	ironmental.com			
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35-10-EBH 45-12-5812	12.5	1455	5			D			X										
5 5-15-8812	15	1500	5			30			X										V.
6 J-10-E81	10	0855	J						×								Call	ecte	10/13 %
75-5-EBI	5	0845	S	ė					200									y only	
8 5-12.5- EB W	12.5	0900	5						X									only	
95-15- 581	15	0905	5						80									x only	
10 5-7,5-EB17	7.5	0935	5			X			X									7	
115-10 -EBI7	10	0940	5			X			Ø										
125-5-EB18	5	1020	5			×			V										
135-2.5-5819	25	1040	5																
14 8-7.5-EBIL	7.5	1255	S						XII								Dx/s	x toles	
15 5-10-EB25	10	155	5						X									X on to	
105-7.5 6023	7.5	1835	-5-					-	X		-					-	Doct	Dr 014	
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PORT OF EVERETT PROJECT Cardno Everett, Washington

Libby Project # L201013-10 Client Project # 031447 3322 South Bay Road NE Olympia, WA 98506 Phone: (360) 352-2110 FAX: (360) 352-4154

Email: libbyenv@gmail.com

Analyses of Gasoline (NWTPH-Gx) in Soil

Sample	Date	Date	Dilution	Surrogate	Gasoline
Number	Collected	Analyzed		Recovery (%)	(mg/kg)
Method Blank	N/A	10/13/2020		99%	nd
S-5-EB12	10/12/2020	10/13/2020		100%	nd
S-10-EB12	10/12/2020	10/13/2020	10	99%	<100
S-12.5-EB12	10/12/2020	10/13/2020	10	99%	<100
S-15-EB12	10/12/2020	10/13/2020		99%	nd
S-15-EB12 Dup	N/A	10/13/2020		97%	nd
S-7.5-EB17	10/13/2020	10/13/2020		99%	11
S-10-EB17	10/13/2020	10/13/2020	5	97%	< 50
S-5-EB18	10/13/2020	10/13/2020		96%	nd
Practical Quantitation Limit					10

[&]quot;<" Indicates elevated PQL due to dilution.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE (Toluene-d8): 65% TO 135%

[&]quot;nd" Indicates not detected at the listed detection limits.

[&]quot;int" Indicates that interference prevents determination.

PORT OF EVERETT PROJECT Cardno Everett, Washington Libby Project # L201013-10

Client Project # 031447

3322 South Bay Road NE Olympia, WA 98506 Phone: (360) 352-2110

FAX: (360) 352-4154 Email: libbyenv@gmail.com

Analyses of Diesel & Oil (NWTPH-Dx/Dx Extended) in Soil with Silica Gel Clean-up

Sample	Date	Date	Dilution	Surrogate	Diesel	Oil
Number	Collected	Analyzed	Diffution	Recovery (%)	(mg/kg)	
						(mg/kg)
Method Blank	N/A	10/13/2020		81	nd	nd
S-5-EB12	10/12/2020	10/13/2020		int	160	nd
S-7.5-EB12	10/12/2020	10/13/2020		135	3600	nd
S-10-EB12	10/12/2020	10/13/2020	5	int	3000	nd
S-12.5-EB12	10/12/2020	10/13/2020		int	2000	nd
S-15-EB12	10/12/2020	10/13/2020		int	460	nd
S-15-EB12 Dup	N/A	10/13/2020		int	410	nd
S-10-EB1	10/13/2020	10/13/2020		int	16000 E	nd
S-5-EB1	10/13/2020	10/13/2020		100	nd	nd
S-12.5-EB1	10/13/2020	10/13/2020		int	3500	nd
S-15-EB1	10/13/2020	10/13/2020		95	nd	nd
S-7.5-EB17	10/13/2020	10/13/2020	20	int	33000	nd
S-10-EB17	10/13/2020	10/13/2020	5	int	2600	nd
S-5-EB18	10/13/2020	10/13/2020		120	450	210 J
S-5-EB18 Dup	N/A	10/13/2020		int	440	290
S-7.5-EB16	10/13/2020	10/13/2020	5	int	9700	3900
S-10-EB25	10/13/2020	10/13/2020		int	2400	860
Practical Quantit	ation Limit				50	250

[&]quot;E" Indicates reported result is an estimate because it exceeds the calibration range.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE (2-F Biphenyl): 65% TO 135%

[&]quot;J" Indicates analyte was positively identified. Reported result is an estimate.

[&]quot;nd" Indicates not detected at the listed detection limits.

[&]quot;int" Indicates that interference prevents determination.

PORT OF EVERETT PROJECT Cardno Everett, Washington Libby Project # L201013-10 Client Project # 031447 3322 South Bay Road NE Olympia, WA 98506 Phone: (360) 352-2110 FAX: (360) 352-4154 Email: libbyenv@gmail.com

CCV Gasoline by NWTPH-Gx in Soil

Sample	Date	Gasoline	CCV Recovery	CCV Recovery Limits
Number	Analyzed	(mg/kg)	(%)	(%)
CCV Rv1 50 ppm	10/13/2020	58.7	117%	80-120%
Practical Quantitation Limit		10		_

PORT OF EVERETT PROJECT Cardno Everett, Washington Libby Project # L201013-10 Client Project # 031447 3322 South Bay Road NE Olympia, WA 98506 Phone: (360) 352-2110 FAX: (360) 352-4154

Email: libbyenv@gmail.com

CCV Diesel by NWTPH-Dx in Soil

Sample	Date	Diesel	CCV Recovery	CCV Recovery Limits
Number	Analyzed	(mg/kg)	(%)	(%)
CCV Nova Scotia FID 1 500 ppm	10/13/2020	572	114%	85-115%
CCV Nova Scotia FID 2 500 ppm	10/13/2020	548	110%	85-115%
Practical Quantitation Limit		50		

Libby Environm	ental,	inc.	- (, CI	air	of	Cı	ust	ody	/ B	ec	ore	d							www.l	LibbyE	nvironr	nental.com
Libby Environm 3322 South Bay Road NE Olympia, WA 98506 Client: Cardoo	Ph: Fax:	360-352-2 360-352-4	2110 MOE 1154	ile Lab		_	Date		[0] lanag	-	$\frac{1}{2}$	_	7	han	00	an	Pag	e:	1		of	_/	/
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	1447	I GA.					Collector: fau Pre Voa Date of Collection: 10//3 1 10/14/										11/26						
Sample Number	Depth	Time	Sample Type	Container Type	/5	5 8 1 N	12 4 6 C	7 65 X	A STAN	\$ \\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \		10 PH 60	10 /s	130	310/85 80 15	38 SW	23 B	A STATE OF THE PARTY OF THE PAR		//	ield N	otes	
15-7,5-EB23	7.5	1335	5							X										Dy on	y (0)	lecte	10/13
25-10-688	10	0810	5							X										Dron	L. Cot	(p) te	loly
35-5-EB9	5	0835	5							X										Dron	i.		
45-10-8826	10	0905	5							X										Dxo	ah s		
5 5-10-EB-23	10	1340	S							X										DX O	the A	Love	ted 20/13
6 S-7.5-EBZ7	7.5	0435	5							x													4 6/14
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PORT OF EVERETT PROJECT
Cardno

Everett, Washington
Libby Project # L201014-10

Client Project # 031447

3322 South Bay Road NE

Olympia, WA 98506

Phone: (360) 352-2110

FAX: (360) 352-4154

Email: libbyenv@gmail.com

Analyses of Diesel & Oil (NWTPH-Dx/Dx Extended) in Soil with Silica Gel Clean-up

Sample	Date	Date	Dilution	Surrogate	Diesel	Oil
Number	Collected	Analyzed		Recovery (%)	(mg/kg)	(mg/kg)
Method Blank	N/A	10/14/2020		85	nd	nd
S-7.5-EB23	10/13/2020	10/14/2020		83	nd	nd
S-7.5-EB23 Dup	N/A	10/14/2020		85	nd	nd
S-10-EB8	10/14/2020	10/14/2020		int	1800	1300
S-5-EB9	10/14/2020	10/14/2020		int	2700	11000 E
S-10-EB26	10/14/2020	10/14/2020		int	1600	nd
S-10-EB23	10/13/2020	10/14/2020		int	4100	nd
S-7.5-EB27	10/14/2020	10/14/2020	20	int	10000	11000
S-10-EB27	10/14/2020	10/14/2020		int	9100 E	nd
Practical Quantita	tion Limit				50	250

[&]quot;E" Indicates reported result is an estimate because it exceeds the calibration range.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE (2-F Biphenyl): 65% TO 135%

[&]quot;nd" Indicates not detected at the listed detection limits.

[&]quot;int" Indicates that interference prevents determination.

PORT OF EVERETT PROJECT Cardno Everett, Washington Libby Project # L201014-10 Client Project # 031447 3322 South Bay Road NE Olympia, WA 98506 Phone: (360) 352-2110 FAX: (360) 352-4154

Email: libbyenv@gmail.com

CCV Diesel by NWTPH-Dx in Soil

Sample	Date	Diesel	CCV Recovery	CCV Recovery Limits
Number	Analyzed	(mg/kg)	(%)	(%)
CCV Nova Scotia FID 1 500 ppm	10/14/2020	570	114%	85-115%
CCV Nova Scotia FID 2 500 ppm	10/14/2020	572	114%	85-115%
Practical Quantitation Limit		50		

Libby Environm	ental,	Inc.	_	J. CI	nain, o	f _/ Cus	stody	Reco	OFC	d					www.	LibbyEnv	ironme	ntal.com
3322 South Bay Road NE	Ph:	360-352-2 360-352-4		lympio	La	Date:	10,	13/	de	U			age:	_		of	4	
Olympia, WA 98506 Client: Car o	dno					Project	Manag	er: B	ob	5 Ti	homp	501						
Address:						Project	Name:	Port	- 0	of E	Vere	++						
City:		State:	Zip	1		Location: City, Sta									nte: Everett WA			
Phone:		Fax:				Collect	or: Pa	ul Pre	eVe	7a		D	ate of	Colle	ection:	10/12	\$ 10	/13
Client Project # 0	31441					Email:												
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1 5-7.5-EB1Z	7.5	1445	5		×							\perp		\perp	Gx	only (0/11
2 5-2.5-EBIZ	2.5	1435	5		N			yo			_			-	-	O ic		-
35-25-682	2.5	0815	5		χ0			y)						\perp	Col	lacted	10	/13
45-5-EBZ	.5	0820	5		V			X					\perp		1			
55-10-EBZ	10	0830	5		X			V										
6J-2.5-EB1	2.5	0840	5		X			O			_							
75-5 -E81	5	0845	5		X								_		6x	only		
85-10-EBI	10	0855	5		10										Gx	only		
95-12.5-881	12.5	0900	5		X			\perp					_		GX	okty		/
10 5-15" EBI	15	0905	S		X						\perp				GX	only		<u> </u>
11 J-2.5-8817	2.5	0925	5		X			М						\perp				
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15-10-EB19	10	1055	5		X	X					Coll	ected 10	/13
2 5-12.5- 8819	12.5	1100	5		X	X							
35-15-EB19	15	1105	ح ا		×	X							
45-2.5-EBHEB2!	2.5	1110	5		X	X							
5 5-5-E821	5	1115	5			X							
6 5-7-5-EB21	7.5	1120	5		X	X							
7,5-10-EB21	10	1125	5		I X	X							
85-12.5-EB21	12.5	1130	5		X	X							
9 5-15-EB21	15	1135	5		X	X							
10,5-2.5-EBIL	2.5	1245	5		X	×		T				1	
11 5-5-EBIL	5"	1250	5		X	X						1	
12 5-7.5-EBIL	7.5	1255	3		X						G-X	only	
13 5-10 - EB 16	10	1300	5		X	X							
14 8 - Z. 5 - EB20	2.5	1720	S		X	X						11	
15 8-5-E820	5	1225	5		X	X						- 4	
16 5-7.5-EB20	7.5	1230	5		X	X							
175-10-EBZO	10	1235	3		100	X						J	/
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Libby Environmental, Inc. Chain of Custody Record										www.LibbyE	nvironmental.com
4139 Libby Road NE Olympia, WA 98506		360-352-2 360-352-4		OLYMPI	A LAB Date	10/13/20			3	of	4
Client: (ardno)					Proje		ob Thom				•
Address:					Proje	ed Name: Port	of EVE	rett			
City:		State:	Zip		Loca	tion: Port of	Wevett	City,	State:	Werett	MA
Phone:		Fax:			Colle	ector: Paul Pi	retoa	Date	of Colle	ction: 10)	13/20
Client Project # 03	1447				Ema	d:					
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25-25-EB13	2.5	1325	5		X	X		\perp			
35-5-8523	5	1330	5		X)	X					
4 5.75-8823	7.5	1335	5		X	0				Gx only	/
5 S-10-E823	10	1340	5		X					Ge only	,
6 5-12.5-E923	12.5	1345	5		X	X					
75-5-EB22	5	1030	5		\sim	18					
85-25-E824	2.5	1355	5		×	X					
95-5-EB24	5	1400	5		×	X					
10 5-7,5-EB24	7.5	1405	S		X	X					
11 5-10-EB24	10	1410	5		X	X					
12 S-12.5-EB24	12.5	1415	5		X	X					
13 5-2.5- EB25	2.5	1500	5		X	N/					
14 5-5- EB25	5==	1505	5		X	X					7
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16 5-10-E825	10	1515	5		X					6x mles	
17 S-12.5-EB25	12.5	1520	5	1	X	X				1	V
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Relinquished by:	Date	/ I AITE		Scaved by:		Date / Time	Total Number Containers	or	TA	T: 24HR	48HR 5-DAY
UEDAL ACTION CLAUSE. In the event of defeut of	of payment and/or little	re to pay, Cliani ag	rees to pay the costs	Truce gribulori navsello to	costs and reasonable allomes	fact to be determined by a cour of law					low - File. Pink - Originator

Libby Environmental, Inc. 4139 Libby Road NE Ph: 360-352-2110 Clympia, WA 98506 Fax: 360-352-4154				CI	nair	1 0	f Cı	ıst	ody	R	eco	rc	1							www.L	ibbyEnvi	ronmei	ntal.com
4139 Libby Road NE Olympia, WA 98506				OLYM	PIA	LAI	Date:	:							כ		Pag	e:	4		of	4	
Client:							Proje	ect M	anage	er:												1	
Address:							Proje	ct N	ame:														
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Phone:		Fax:					Colle	ctor:									Date	e of C	Collec	ction:			
Client Project #				nived to			Emai	il:															
Sample Number	Sample Number Depth Time Type				J.S.	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	ART ST	1 63 XX		0/0/2/3/3/3/3/3/3/3/3/3/3/3/3/3/3/3/3/3/	1 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	1 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	10 K	130	20 M	3 6 N	25 CE S	NE BE		/ / F	ield Not	es	
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Relinquished by:	Date	/ Time		Received by:						ers.	Time			Numl					TA	T: 24	HR AS	BHR	5-DAY
EEGAL ACTION CLAUSE: In the event of default of payment addition follows to play. Of one agreed to play the coal				te of collection including court costs and repsametria allumay fees to be determined by a coult of time.																			

PORT OF EVERETT PROJECT Cardno Everett, Washington Libby Project # L201014-5 Client Project # 031447 3322 South Bay Road NE Olympia, WA 98506 Phone: (360) 352-2110 FAX: (360) 352-4154 Email: libbyenv@gmail.com

Analyses of Gasoline (NWTPH-Gx) in Soil

Sample	Date	Date	Dilution	Surrogate	Gasoline
Number	Collected	Analyzed		Recovery (%)	(mg/kg)
Method Blank	N/A	10/16/2020		100%	nd
Method Blank	N/A	10/17/2020		107%	nd
S-7.5-EB12	10/12/2020	10/17/2020		77%	nd
S-2.5-EB12	10/12/2020	10/17/2020		101%	nd
S-2.5-EB2	10/13/2020	10/17/2020		100%	nd
S-5-EB2	10/13/2020	10/16/2020		86%	nd
S-10-EB2	10/13/2020	10/16/2020		85%	nd
S-2.5-EB1	10/13/2020	10/16/2020		81%	nd
S-5-EB1	10/13/2020	10/17/2020		106%	nd
S-10-EB1	10/13/2020	10/17/2020	10	112%	<100
S-10-EB1 Dup	N/A	10/17/2020	10	112%	<100
S-12.5-EB1	10/13/2020	10/17/2020	5	107%	< 50
S-15-EB1	10/13/2020	10/17/2020		115%	nd
S-2.5-EB17	10/13/2020	10/16/2020		89%	nd
S-5-EB17	10/13/2020	10/16/2020		80%	nd
S-5-EB17 Dup	N/A	10/16/2020		87%	nd
S-12.5-EB17	10/13/2020	10/16/2020		87%	nd
S-15-EB17	10/13/2020	10/16/2020		93%	nd
S-15-EB17 Dup	N/A	10/16/2020		80%	nd
S-2.5-EB19	10/13/2020	10/16/2020		80%	nd
S-5-EB19	10/13/2020	10/16/2020	5	96%	< 50
S-7.5-EB19	10/13/2020	10/16/2020	5	91%	< 50
Practical Quantitation Limit					10

[&]quot;<" PQL elevated due to dilution.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE (Toluene-d8): 65% TO 135%

ANALYSES PERFORMED BY: Melissa Harrington & Sherry Chilcutt

[&]quot;nd" Indicates not detected at the listed detection limits.

[&]quot;int" Indicates that interference prevents determination.

PORT OF EVERETT PROJECT Cardno Everett, Washington Libby Project # L201014-5 Client Project # 031447 3322 South Bay Road NE Olympia, WA 98506 Phone: (360) 352-2110 FAX: (360) 352-4154 Email: libbyenv@gmail.com

Analyses of Gasoline (NWTPH-Gx) in Soil

Sample	Date	Date	Dilution	Surrogate	Gasoline
Number	Collected	Analyzed		Recovery (%)	(mg/kg)
Method Blank	N/A	10/16/2020		96%	nd
Method Blank	N/A	10/17/2020		96%	nd
S-10-EB19	10/13/2020	10/16/2020		89%	nd
S-12.5-EB19	10/13/2020	10/16/2020		91%	nd
S-15-EB19	10/13/2020	10/16/2020		86%	nd
S-2.5-EB21	10/13/2020	10/16/2020		78%	nd
S-5-EB21	10/13/2020	10/16/2020		82%	nd
S-7.5-EB21	10/13/2020	10/16/2020	5	72%	< 50
S-10-EB21	10/13/2020	10/16/2020		72%	nd
S-12.5-EB21	10/13/2020	10/16/2020		94%	nd
S-15-EB21	10/13/2020	10/16/2020		95%	nd
S-2.5-EB16	10/13/2020	10/16/2020		93%	nd
S-5-EB16	10/13/2020	10/16/2020	10	95%	<100
S-7.5-EB16	10/13/2020	10/17/2020	10	115%	<100
S-10-EB16	10/13/2020	10/16/2020		95%	nd
S-2.5-EB20	10/13/2020	10/16/2020		96%	nd
S-2.5-EB20 Dup	N/A	10/16/2020		97%	nd
S-5-EB20	10/13/2020	10/17/2020		119%	nd
S-7.5-EB20	10/13/2020	10/16/2020		97%	nd
S-10-EB20	10/13/2020	10/16/2020		96%	nd
Practical Quantitation Limit					10

[&]quot;<" PQL elevated due to dilution.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE (Toluene-d8): 65% TO 135%

ANALYSES PERFORMED BY: Paul Burke & Sherry Chilcutt

[&]quot;nd" Indicates not detected at the listed detection limits.

[&]quot;int" Indicates that interference prevents determination.

PORT OF EVERETT PROJECT Cardno Everett, Washington Libby Project # L201014-5 Client Project # 031447 3322 South Bay Road NE Olympia, WA 98506 Phone: (360) 352-2110 FAX: (360) 352-4154 Email: libbyenv@gmail.com

Analyses of Gasoline (NWTPH-Gx) in Soil

Sample	Date	Date	Dilution	Surrogate	Gasoline
Number	Collected	Analyzed		Recovery (%)	(mg/kg)
Method Blank	N/A	10/16/2020		96%	nd
Method Blank	N/A	10/17/2020		96%	nd
S-12.5-EB16	10/13/2020	10/16/2020		96%	nd
S-2.5-EB23	10/13/2020	10/16/2020		97%	nd
S-5-EB23	10/13/2020	10/16/2020		97%	nd
S-7.5-EB23	10/13/2020	10/17/2020		110%	nd
S-10-EB23	10/13/2020	10/17/2020		112%	nd
S-12.5-EB23	10/13/2020	10/16/2020		97%	nd
S-5-EB22	10/13/2020	10/17/2020		103%	nd
S-2.5-EB24	10/13/2020	10/17/2020		107%	nd
S-5-EB24	10/13/2020	10/17/2020	5	114%	< 50
S-7.5-EB24	10/13/2020	10/17/2020		82%	nd
S-7.5-EB24 Dup	N/A	10/17/2020		113%	nd
S-10-EB24	10/13/2020	10/17/2020		92%	nd
S-12.5-EB24	10/13/2020	10/16/2020		96%	nd
S-2.5-EB25	10/13/2020	10/16/2020		94%	nd
S-5-EB25	10/13/2020	10/16/2020		92%	nd
S-7.5-EB25	10/13/2020	10/16/2020		95%	nd
S-10-EB25	10/13/2020	10/17/2020		102%	nd
S-12.5-EB25	10/13/2020	10/16/2020		94%	nd
S-12.5-EB25 Dup	N/A	10/16/2020		94%	nd
Practical Quantitation Limit					10

[&]quot;<" PQL elevated due to dilution.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE (Toluene-d8): 65% TO 135%

ANALYSES PERFORMED BY: Paul Burke & Sherry Chilcutt

[&]quot;nd" Indicates not detected at the listed detection limits.

[&]quot;int" Indicates that interference prevents determination.

PORT OF EVERETT PROJECT Cardno Everett, Washington Libby Project # L201014-5

Client Project # 031447

3322 South Bay Road NE Olympia, WA 98506

Phone: (360) 352-2110

FAX: (360) 352-4154 Email: libbyenv@gmail.com

Analyses of Diesel & Oil (NWTPH-Dx/Dx Extended) in Soil with Silica Gel Clean-up

Sample	Date	Date	Dilution	Surrogate	Diesel	Oil
Number	Collected	Analyzed		Recovery (%)	(mg/kg)	(mg/kg)
Method Blank	N/A	10/15/2020		103	nd	nd
S-2.5-EB12	10/12/2020	10/15/2020		71	nd	nd
S-2.5-EB2	10/13/2020	10/15/2020		102	nd	nd
S-5-EB2	10/13/2020	10/15/2020		97	nd	nd
S-10-EB2	10/13/2020	10/15/2020		72	nd	nd
S-2.5-EB1	10/13/2020	10/15/2020		84	nd	nd
S-2.5-EB17	10/13/2020	10/15/2020		106	nd	nd
S-5-EB17	10/13/2020	10/15/2020		73	nd	nd
S-12.5-EB17	10/13/2020	10/15/2020		111	nd	nd
S-15-EB17	10/13/2020	10/15/2020		107	nd	nd
S-2.5-EB19	10/13/2020	10/15/2020		75	nd	nd
S-2.5-EB19 Dup	N/A	10/15/2020		115	nd	nd
S-5-EB19	10/13/2020	10/15/2020		int	1900	360
S-7.5-EB19	10/13/2020	10/15/2020		int	4500	760
Practical Quantita	tion Limit				50	250

[&]quot;nd" Indicates not detected at the listed detection limits.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE (2-F Biphenyl): 65% TO 135%

ANALYSES PERFORMED BY: Sherry Chilcutt

[&]quot;int" Indicates that interference prevents determination.

PORT OF EVERETT PROJECT
Cardno
Everett, Washington
Libby Project # L201014-5

Client Project # 031447

3322 South Bay Road NE

Olympia, WA 98506 Phone: (360) 352-2110

FAX: (360) 352-4154

Email: libbyenv@gmail.com

Analyses of Diesel & Oil (NWTPH-Dx/Dx Extended) in Soil with Silica Gel Clean-up

Sample	Date	Date	Dilution	Surrogate	Diesel	Oil
Number	Collected	Analyzed		Recovery (%)	(mg/kg)	(mg/kg)
Method Blank	N/A	10/15/2020		103	nd	nd
Method Blank	N/A	10/16/2020		103	nd	nd
Method Blank	N/A	10/17/2020		107	nd	nd
S-10-EB19	10/13/2020	10/15/2020		116	nd	nd
S-12.5-EB19	10/13/2020	10/15/2020		106	nd	nd
S-15-EB19	10/13/2020	10/15/2020		76	nd	nd
S-2.5-EB21	10/13/2020	10/15/2020		111	nd	nd
S-5-EB21	10/13/2020	10/15/2020	10	int	8100	12000
S-7.5-EB21	10/13/2020	10/15/2020		int	3700	640
S-10-EB21	10/13/2020	10/15/2020		112	nd	nd
S-10-EB21 Dup	N/A	10/15/2020		84	nd	nd
S-12.5-EB21	10/13/2020	10/16/2020		99	nd	nd
S-15-EB21	10/13/2020	10/16/2020		100	nd	nd
S-2.5-EB16	10/13/2020	10/16/2020		112	nd	nd
S-5-EB16	10/13/2020	10/16/2020		117	4800	1100
S-10-EB16	10/13/2020	10/16/2020		97	170	nd
S-2.5-EB20	10/13/2020	10/16/2020		112	170	nd
S-5-EB20	10/13/2020	10/17/2020	10	111	8400	2200
S-7.5-EB20	10/13/2020	10/17/2020		107	180	nd
S-10-EB20	10/13/2020	10/17/2020		103	nd	nd
Practical Quantita	ation Limit				50	250

[&]quot;nd" Indicates not detected at the listed detection limits.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE (2-F Biphenyl): 65% TO 135%

ANALYSES PERFORMED BY: Sherry Chilcutt & Jenny Anderson

[&]quot;int" Indicates that interference prevents determination.

PORT OF EVERETT PROJECT Cardno Everett, Washington Libby Project # L201014-5

Client Project # 031447

FAX: (360) 352-4154 Email: libbyenv@gmail.com

3322 South Bay Road NE

Olympia, WA 98506

Phone: (360) 352-2110

Analyses of Diesel & Oil (NWTPH-Dx/Dx Extended) in Soil with Silica Gel Clean-up

Sample	Date	Date	Dilution	Surrogate	Diesel	Oil
Number	Collected	Analyzed		Recovery (%)	(mg/kg)	(mg/kg)
Method Blank	N/A	10/16/2020		85	nd	nd
S-12.5-EB16	10/13/2020	10/17/2020		104	nd	nd
S-12.5-EB16 Dup	N/A	10/17/2020		103	nd	nd
S-2.5-EB23	10/13/2020	10/17/2020		97	nd	nd
S-5-EB23	10/13/2020	10/17/2020		100	nd	nd
S-12.5-EB23	10/13/2020	10/17/2020		101	62	nd
S-5-EB22	10/13/2020	10/17/2020		101	nd	nd
S-2.5-EB24	10/13/2020	10/17/2020		101	nd	nd
S-5-EB24	10/13/2020	10/17/2020	2	100	nd	6300
S-7.5-EB24	10/13/2020	10/17/2020	2	116	8100	1200
S-10-EB24	10/13/2020	10/17/2020		109	2300	nd
S-12.5-EB24	10/13/2020	10/17/2020		100	nd	nd
S-2.5-EB25	10/13/2020	10/17/2020		117	nd	nd
S-2.5-EB25 Dup	N/A	10/17/2020		100	nd	nd
S-5-EB25	10/13/2020	10/16/2020		113	nd	nd
S-7.5-EB25	10/13/2020	10/16/2020		100	nd	nd
S-12.5-EB25	10/13/2020	10/16/2020		109	nd	nd
S-15-EB25	10/13/2020	10/16/2020		97	nd	nd
Practical Quantita	tion Limit				50	250

[&]quot;nd" Indicates not detected at the listed detection limits.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE (2-F Biphenyl): 65% TO 135%

ANALYSES PERFORMED BY: Paul Burke & Jenny Anderson

[&]quot;int" Indicates that interference prevents determination.

PORT OF EVERETT PROJECT Cardno Everett, Washington Libby Project # L201014-5 Client Project # 031447 3322 South Bay Road NE Olympia, WA 98506 Phone: (360) 352-2110 FAX: (360) 352-4154 Email: libbyenv@gmail.com

CCV Gasoline by NWTPH-Gx in Soil

Sample	Date	Gasoline	CCV Recovery	CCV Recovery Limits
Number	Analyzed	(mg/kg)	(%)	(%)
CCV Yahtzee PID 1 50 ppm	10/16/2020	47.5	95%	80-120%
CCV RV1 50 ppm	10/16/2020	47.9	96%	80-120%
CCV RV1 50 ppm	10/17/2020	57.9	116%	80-120%
Practical Quantitation Limit		10		

ANALYSES PERFORMED BY: Melissa Harrington & Sherry Chilcutt & Paul Burke

PORT OF EVERETT PROJECT Cardno Everett, Washington Libby Project # L201014-5 Client Project # 031447 3322 South Bay Road NE Olympia, WA 98506

Phone: (360) 352-2110 FAX: (360) 352-4154

Email: libbyenv@gmail.com

CCV Diesel by NWTPH-Dx in Soil

Sample	Date	Diesel	CCV Recovery	CCV Recovery Limits
Number	Analyzed	(mg/kg)	(%)	(%)
CCV Nova Scotia FID 1 500 ppm	10/16/2020	557	111%	85-115%
CCV Nova Scotia FID 2 500 ppm	10/16/2020	524	105%	85-115%
CCV Stella FID 1 500 ppm	10/15/2020	464	93%	85-115%
CCV Stella FID 2 500 ppm	10/15/2020	519	104%	85-115%
CCV Stella FID 3 500 ppm	10/15/2020	477	95%	85-115%
CCV Kilvan FID 1 500 ppm	10/17/2020	464	93%	85-115%
Practical Quantitation Limit		50		

ANALYSES PERFORMED BY: Paul Burke & Jenny Anderson & Sherry Chilcutt

Libby Environm	ympia CI	hain o	f Cus	stody	Rec	ore	d						www.Libl	byEnviro	nmental	.com			
Olympia, WA 98506	Ph: Fax:	360-352-4 360-352-4	2110 OI	ympia	Lab	Date:	10/14	120					Pag	e:			of	3	
Client: (ardno						Project	Manage	r: L	306	5 7	hol	1250	7						
Address:							Name:	Por	+	OF	E	Ver	1+	-					
City:		State:	Zip);		Locatio	on: for	FOF	E	Vere	1+		City,	Stat	e: £	Vere	1+	WA	-
Phone:		Fax:				Collect	or: Pay	1 P	rev	6a			Date	e of C	ollec	tion:	0/1	4/2	0
Client Project #	3144	7				Email:													
Sample Number	Depth	Time	Sample Type	Container Type	10C 80°	8 13 15 15 15 15 15 15 15 15 15 15 15 15 15	ST LIVE	Wildy C	2410t 2410t	10 10 RH 6210	18 18 18 18 18 18 18 18 18 18 18 18 18 1	Wick of	Car of	Metals		Fiel	ld Note:	s	
15-2.5-EB8	2.5	0755	S		X)	4								Collecte	10/1	4/2020	
25-5-EB8	5	0800	5		X		X	7											
35-7.5-EBB	7.5	0805	5		X			×											
4 5-10-EB8	10	0810	5		X											Gx only	1		
5 5-12.5-EBB	12.5	0815	5		X		\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \	4							- 2				
6 5-2.5-EB9	2.5	0830	5		×		X												
7 S-5-E89	5	0835	5		X		4									Gx on	h		
8 5-7.5-EB9	7.5	0840	5		X														
9 5-10-EB9	10	0845	5		X		7												
10 5-2.5-EBZ6	2.5	DBSO	5		X		X												
11 S-5-EBZY	5	0855	5		X			<											
12 5-10-EB24	10	0905	5		X											Gxonly			
13 5-12,5-EB24	12.5	0910	5		X			(J			
14 5-2.5-EBZ7	2.5	0925	5		X		N N												
15.5-5 - EBZ7	5	0930	3		X)												
16 S-7.5-E827	7.5	0935	5		X											Gx only			
17 5-10-EBZ7	lo	0940	5		aX											Gronly	-	V	
Relinquished by:		/ Time		Received to.	110		/ / Da	ite / Time			Samp	le Re	ceipt			arks:			
Harl KL	10/1	4/2020	1500	/ Van	Plas	10/	14/20	150	2	Good	Conditi	on?	Υ	N					
Relinquished by:	Date	/ Time		Received by:	, ,	0 1	Da	ate / Time	e		r Temp			*C					
Polinguished by	Date	/ Time		Pagained his				to / Time	^	-	le Tem			*C					
Relinquished by: Date / Time Received I											Total Number of Containers				TAT: 24HR 48HR 5-DAY				

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3322 South Bay Road NE Olympia, WA 98506		360-352-4 360-352-4	2110 1154	OLYMPIA	f LAB	Date:	10/	141	20					ige:	2	Z	of	3	
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6 5-2.5-E829	2.5	1035	5		X			X											
7 5-5- EB29	5	1040	5		X			X											
8 5-2,5-E813	2.5	1125	5		X			X											
9 5-5-EB13	5	1130	5		X			X											
10 8-7.5-EB13	7.5	1135	5		X			X											
11 5-10-EB13	10	1140	5		X			X											
12 5-12.5-E813	12.5	1145	3		X			X											
13 5-15-E813	15	1150	5		X			X											
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17 5-12.5-EBH	12.5	1330	5		1 4			X									V	/	
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Libby Environr								ody F	ec	orc	t							www.	LibbyE	nvironm	ental.com
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1 J-2.5-EB15	2.5	1220	5		X													Collec	ted 1	0/14	
2 J-5-EB15	5	1275	5		X			X											1		
3 5-7.5-EBIS	7.5	1230	5		X			X													
4 5-10-EBIS	10	1240	S		X			X									I				
5 5-12.5-EB15	12.5	1245	5		X			X													
6 5-2.5-EB10	2.5	1335	S		X			X													
7 5-5-EB10	5	1340	5		X			X													
8 J-7.5-EB10	7.5	1345	5		X			X													
9 5-10-EB10	10	1350	5		X			X													
10 5-12.5-EBIO	12.5	1355	5		X			×													
11 5-15- EBIO	15	1400	S		X			X													
12 J-2.5-EB30	2.5	1405	S		V			X													
13 5-5- EB30	5	1410	2		X			X													
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PORT OF EVERETT PROJECT Cardno Everett, Washington Libby Project # L201015-3 Client Project # 031447 3322 South Bay Road NE Olympia, WA 98506 Phone: (360) 352-2110 FAX: (360) 352-4154 Email: libbyenv@gmail.com

Analyses of Gasoline (NWTPH-Gx) in Soil

Sample	Date	Date	Dilution	Surrogate	Gasoline
Number	Collected	Analyzed		Recovery (%)	(mg/kg)
Method Blank	N/A	10/14/2020		97%	nd
Method Blank	N/A	10/15/2020		95%	nd
Method Blank	N/A	10/16/2020		110%	nd
S-2.5-EB8	10/14/2020	10/14/2020		98%	nd
S-5-EB8	10/14/2020	10/14/2020		106%	nd
S-7.5-EB8	10/14/2020	10/16/2020	5	90%	nd
S-10-EB8	10/14/2020	10/14/2020	2	95%	< 20
S-12.5-EB8	10/14/2020	10/14/2020		95%	nd
S-2.5-EB9	10/14/2020	10/14/2020		98%	nd
S-5-EB9	10/14/2020	10/14/2020	5	98%	< 50
S-7.5-EB9	10/14/2020	10/15/2020		94%	nd
S-10-EB9	10/14/2020	10/15/2020		95%	nd
S-2.5-EB26	10/14/2020	10/14/2020		97%	nd
S-2.5-EB26 Dup	N/A	10/14/2020		96%	nd
S-5-EB26	10/14/2020	10/16/2020		102%	nd
S-10-EB26	10/14/2020	10/14/2020	2	98%	< 20
S-12.5-EB26	10/14/2020	10/14/2020		93%	nd
S-2.5-EB27	10/14/2020	10/14/2020		97%	nd
S-5-EB27	10/14/2020	10/16/2020		100%	nd
S-7.5-EB27	10/14/2020	10/14/2020	10	97%	<100
S-10-EB27	10/14/2020	10/14/2020	10	95%	<100
S-10-EB27 Dup	N/A	10/14/2020	10	97%	<100
Practical Quantitation Limit					10

[&]quot;nd" Indicates not detected at the listed detection limits.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE (Toluene-d8): 65% TO 135%

ANALYSES PERFORMED BY: Sherry Chilcutt

[&]quot;<" PQL elevated due to dilution.

[&]quot;int" Indicates that interference prevents determination.

PORT OF EVERETT PROJECT Cardno Everett, Washington Libby Project # L201015-3 Client Project # 031447 3322 South Bay Road NE Olympia, WA 98506 Phone: (360) 352-2110 FAX: (360) 352-4154 Email: libbyenv@gmail.com

Analyses of Gasoline (NWTPH-Gx) in Soil

Sample	Date	Date	Dilution	Surrogate	Gasoline
Number	Collected	Analyzed		Recovery (%)	(mg/kg)
Method Blank	N/A	10/14/2020		97%	nd
Method Blank	N/A	10/15/2020		95%	nd
Method Blank	N/A	10/16/2020		110%	nd
S-12.5-EB27	10/14/2020	10/14/2020		95%	nd
S-12.5-EB27 Dup	N/A	10/14/2020		95%	nd
S-2.5-EB28	10/14/2020	10/14/2020		96%	nd
S-5-EB28	10/14/2020	10/15/2020		93%	nd
S-7.5-EB28	10/14/2020	10/15/2020		94%	nd
S-10-EB28	10/14/2020	10/16/2020	5	98%	< 50
S-2.5-EB29	10/14/2020	10/14/2020		95%	nd
S-5-EB29	10/14/2020	10/16/2020		66%	nd
S-2.5-EB13	10/14/2020	10/14/2020		96%	nd
S-5-EB13	10/14/2020	10/16/2020	5	105%	< 50
S-7.5-EB13	10/14/2020	10/16/2020	5	85%	190
S-7.5-EB13 Dup	N/A	10/16/2020	5	112%	230
S-10-EB13	10/14/2020	10/16/2020		116%	nd
S-12.5-EB13	10/14/2020	10/14/2020		95%	nd
S-15-EB13	10/14/2020	10/16/2020		114%	nd
S-2.5-EB14	10/14/2020	10/14/2020		96%	nd
S-7.5-EB-14	10/14/2020	10/16/2020		116%	nd
S-10-EB14	10/14/2020	10/16/2020		90%	nd
S-12.5-EB14	10/14/2020	10/14/2020		96%	nd
Practical Quantitation Limit					10

[&]quot;nd" Indicates not detected at the listed detection limits.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE (Toluene-d8): 65% TO 135%

ANALYSES PERFORMED BY: Sherry Chilcutt

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PORT OF EVERETT PROJECT Cardno Everett, Washington Libby Project # L201015-3 Client Project # 031447 3322 South Bay Road NE Olympia, WA 98506 Phone: (360) 352-2110 FAX: (360) 352-4154 Email: libbyenv@gmail.com

Analyses of Gasoline (NWTPH-Gx) in Soil

Sample	Date	Date	Dilution	Surrogate	Gasoline
Number	Collected	Analyzed		Recovery (%)	(mg/kg)
Method Blank	N/A	10/14/2020		95%	nd
Method Blank	N/A	10/15/2020		95%	nd
Method Blank	N/A	10/16/2020		110%	nd
S-2.5-EB15	10/14/2020	10/16/2020		96%	nd
S-5-EB15	10/14/2020	10/16/2020		104%	nd
S-7.5-EB15	10/14/2020	10/14/2020		101%	19
S-10-EB15	10/14/2020	10/14/2020		107%	nd
S-12.5-EB15	10/14/2020	10/14/2020		95%	nd
S-2.5-EB10	10/14/2020	10/14/2020		96%	nd
S-5-EB10	10/14/2020	10/14/2020		95%	nd
S-5-EB10 Dup	N/A	10/14/2020		97%	nd
S-7.5-EB10	10/14/2020	10/16/2020		97%	nd
S-7.5-EB10 Dup	N/A	10/16/2020	5	103%	< 50
S-10-EB10	10/14/2020	10/16/2020	5	103%	nd
S-12.5-EB10	10/14/2020	10/15/2020		95%	nd
S-15-EB10	10/14/2020	10/16/2020		113%	nd
S-2.5-EB30	10/14/2020	10/15/2020		96%	nd
S-5-EB30	10/14/2020	10/15/2020		97%	nd
S-10-EB30	10/14/2020	10/17/2020	10	113%	<100
S-12.5-EB30	10/14/2020	10/15/2020		96%	nd
S-12.5-EB30 Dup	N/A	10/15/2020		97%	nd
Practical Quantitation Limit					10

[&]quot;nd" Indicates not detected at the listed detection limits.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE (Toluene-d8): 65% TO 135%

ANALYSES PERFORMED BY: Paul Burke & Sherry Chilcutt

[&]quot;<" PQL elevated due to dilution.

[&]quot;int" Indicates that interference prevents determination.

PORT OF EVERETT PROJECT
Cardno
Everett, Washington
Libby Project # L201015-3

Client Project # 031447

3322 South Bay Road NE

Olympia, WA 98506 Phone: (360) 352-2110

FAX: (360) 352-4154

Email: libbyenv@gmail.com

Analyses of Diesel & Oil (NWTPH-Dx/Dx Extended) in Soil with Silica Gel Clean-up

Sample	Date	Date	Dilution	Surrogate	Diesel	Oil
Number	Collected	Analyzed		Recovery (%)	(mg/kg)	(mg/kg)
Method Blank	N/A	10/16/2020		82	nd	nd
Method Blank	N/A	10/18/2020		95	nd	nd
S-2.5-EB8	10/14/2020	10/16/2020		79	nd	nd
S-5-EB8	10/14/2020	10/16/2020		int	2600	4300
S-7.5-EB8	10/14/2020	10/16/2020	5	int	7400	13000
S-12.5-EB8	10/14/2020	10/16/2020		117	nd	nd
S-2.5-EB-9	10/14/2020	10/18/2020		109	nd	nd
S-7.5-EB9	10/14/2020	10/16/2020		107	nd	nd
S-7.5-EB9 Dup	N/A	10/16/2020		97	nd	nd
S-10-EB9	10/14/2020	10/16/2020		110	nd	nd
S-2.5-EB26	10/14/2020	10/16/2020		99	nd	nd
S-5-EB26	10/14/2020	10/16/2020		105	76	nd
S-12.5-EB26	10/14/2020	10/16/2020		100	nd	nd
S-2.5-EB27	10/14/2020	10/16/2020		108	nd	nd
S-5-EB27	10/14/2020	10/16/2020		103	nd	nd
Practical Quantita	ation Limit				50	250

[&]quot;nd" Indicates not detected at the listed detection limits.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE (2-F Biphenyl): 65% TO 135%

[&]quot;int" Indicates that interference prevents determination.

PORT OF EVERETT PROJECT Cardno Everett, Washington Libby Project # L201015-3

Client Project # 031447

3322 South Bay Road NE

Olympia, WA 98506 Phone: (360) 352-2110

FAX: (360) 352-4154

Email: libbyenv@gmail.com

Analyses of Diesel & Oil (NWTPH-Dx/Dx Extended) in Soil with Silica Gel Clean-up

Sample	Date	Date	Dilution	Surrogate	Diesel	Oil
Number	Collected	Analyzed		Recovery (%)	(mg/kg)	(mg/kg)
Method Blank	N/A	10/16/2020		103	nd	nd
Method Blank	N/A	10/17/2020		105	nd	nd
S-12.5-EB27	10/14/2020	10/17/2020		102	nd	nd
S-2.5-EB28	10/14/2020	10/17/2020		110	nd	nd
S-5-EB28	10/14/2020	10/17/2020		100	nd	nd
S-7.5-EB28	10/14/2020	10/16/2020		105	nd	nd
S-7.5-EB28 Dup	N/A	10/16/2020		98	nd	nd
S-10-EB28	10/14/2020	10/16/2020		83	nd	nd
S-2.5-EB29	10/14/2020	10/16/2020		123	nd	nd
S-5-EB29	10/14/2020	10/16/2020		116	nd	nd
S-2.5-EB13	10/14/2020	10/16/2020		88	nd	nd
S-5-EB13	10/14/2020	10/16/2020		int	1400	1800
S-7.5-EB13	10/14/2020	10/16/2020	10	int	11000	1800
S-10-EB13	10/14/2020	10/16/2020		int	320	nd
S-12.5-EB13	10/14/2020	10/16/2020		116	nd	nd
S-15-EB13	10/14/2020	10/16/2020		124	nd	nd
S-2.5-EB14	10/14/2020	10/16/2020		85	nd	nd
S-2.5-EB14 Dup	N/A	10/16/2020		83	nd	nd
S-7.5-EB-14	10/14/2020	10/16/2020	10	int	5000	6900
S-10-EB14	10/14/2020	10/16/2020	10	int	4100	1500
S-12.5-EB14	10/14/2020	10/16/2020		114	nd	nd
Practical Quantita	tion Limit				50	250

[&]quot;nd" Indicates not detected at the listed detection limits.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE (2-F Biphenyl): 65% TO 135%

ANALYSES PERFORMED BY: Jenny Anderson

[&]quot;int" Indicates that interference prevents determination.

PORT OF EVERETT PROJECT
Cardno
Everett, Washington
Libby Project # L201015-3

Client Project # 031447

3322 South Bay Road NE Olympia, WA 98506

Phone: (360) 352-2110 FAX: (360) 352-4154

Email: libbyenv@gmail.com

Analyses of Diesel & Oil (NWTPH-Dx/Dx Extended) in Soil with Silica Gel Clean-up

Sample	Date	Date	Dilution	Surrogate	Diesel	Oil
Number	Collected	Analyzed		Recovery (%)	(mg/kg)	(mg/kg)
Method Blank	N/A	10/16/2020		76	nd	nd
S-2.5-EB15	10/14/2020	10/16/2020		82	nd	nd
S-5-EB15	10/14/2020	10/16/2020	2	127	1100	2000
S-7.5-EB15	10/14/2020	10/16/2020	2	85	2200	260
S-10-EB15	10/14/2020	10/16/2020		117	nd	nd
S-12.5-EB15	10/14/2020	10/16/2020		83	nd	nd
S-2.5-EB10	10/14/2020	10/18/2020		104	nd	nd
S-5-EB10	10/14/2020	10/16/2020		117	nd	nd
S-5-EB10 Dup	N/A	10/16/2020		118	nd	nd
S-7.5-EB10	10/14/2020	10/16/2020	3	int	12000	nd
S-10-EB10	10/14/2020	10/16/2020		int	4300	nd
S-12.5-EB10	10/14/2020	10/16/2020		117	nd	nd
S-15-EB10	10/14/2020	10/16/2020		123	nd	nd
S-2.5-EB30	10/14/2020	10/16/2020		78	nd	nd
S-5-EB30	10/14/2020	10/16/2020		107	nd	560
S-10-EB30	10/14/2020	10/16/2020	10	int	39000	nd
S-12.5-EB30	10/14/2020	10/16/2020		75	nd	nd
S-12.5-EB30 Dup	N/A	10/16/2020		69	nd	nd
Practical Quantita	tion Limit				50	250

[&]quot;nd" Indicates not detected at the listed detection limits.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE (2-F Biphenyl): 65% TO 135%

ANALYSES PERFORMED BY: Kodey Eley & Jenny Anderson

[&]quot;int" Indicates that interference prevents determination.

PORT OF EVERETT PROJECT Cardno Everett, Washington Libby Project # L201014-5 Client Project # 031447 3322 South Bay Road NE Olympia, WA 98506 Phone: (360) 352-2110 FAX: (360) 352-4154 Email: libbyenv@gmail.com

CCV Gasoline by NWTPH-Gx in Soil

Sample	Date	Gasoline	CCV Recovery	CCV Recovery Limits
Number	Analyzed	(mg/kg)	(%)	(%)
CCV RV1 50 ppm	10/14/2020	57.2	114%	80-120%
CCV RV1 50 ppm	10/15/2020	52.1	104%	80-120%
CCV RV1 50 ppm	10/17/2020	57.9	116%	80-120%
CCV Marvin 50 ppm	10/16/2020	57.9	116%	80-120%
CC v Iviai viii 50 ppiii	10/10/2020	51.7	11070	00-12070
Practical Quantitation Limit		10		

ANALYSES PERFORMED BY: Paul Burke & Sherry Chilcutt

PORT OF EVERETT PROJECT Cardno Everett, Washington Libby Project # L201014-5 Client Project # 031447 3322 South Bay Road NE Olympia, WA 98506 Phone: (360) 352-2110 FAX: (360) 352-4154 Email: libbyenv@gmail.com

CCV Diesel by NWTPH-Dx in Soil

Sample	Date	Diesel	•	CCV Recovery Limits
Number	Analyzed	(mg/kg)	(%)	(%)
CCV Sam FID 1 500 ppm	10/16/2020	437	87%	85-115%
CCV Sam FID 2 500 ppm	10/16/2020	519	104%	85-115%
CCV Stella FID 1 500 ppm	10/16/2020	512	102%	85-115%
CCV Stella FID 2 500 ppm	10/16/2020	567	113%	85-115%
CCV Stella FID 3 500 ppm	10/16/2020	503	101%	85-115%
CCV Stella FID 1 500 ppm	10/18/2020	458	92%	85-115%
CCV Stella FID 2 500 ppm	10/18/2020	532	106%	85-115%
CCV Stella FID 3 500 ppm	10/18/2020	478	96%	85-115%
	10/16/2020		4.0.00	0 = 44 = 0 /
CCV Elmer FID 1 500 ppm	10/16/2020	511	102%	85-115%
CCV Elmer FID 2 500 ppm	10/16/2020	549	110%	85-115%
CCV Nova Scotia FID 1 500 ppr	10/16/2020	557	111%	85-115%
CCV Nova Scotia FID 2 500 ppr		524	105%	85-115%
CC v Nova Scotta F1D 2 300 ppi	10/10/2020	324	10370	03-113/0
CCV Kilvan FID 1 500 ppm	10/17/2020	514	103%	85-115%
Practical Quantitation Limit		50		

ANALYSES PERFORMED BY: Kodey Eley & Jenny Anderson & Paul Burke



3322 South Bay Road NE • Olympia, WA 98506-2957

February 18, 2021

Robert Thompson Cardno 801 Second Ave, Suite 700 Seattle, Washington 98104

Dear Mr. Thompson:

Please find enclosed the analytical data report for the Port of Everett Project located in Everett, Washington.

The results of the analyses are summarized in the attached tables. Applicable detection limits and QA/QC data are included. The sample(s) will be disposed of in 30 days unless we are contacted to arrange long term storage.

Libby Environmental, Inc. appreciates the opportunity to have provided analytical services for this project. If you have any further questions about the data report, please give me a call. It was a pleasure working with you on this project, and we are looking forward to the next opportunity to work together.

Sincerely,

Sherry L. Chilcutt Senior Chemist

Libby Environmental, Inc.

Libby Environs				2 LG	nair	of	Cust	ody l	Rec	ord						WW	w.Libby	Environ	mental.co	n
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Olympia, WA 98506		360-352-	4154	,]		<u> </u>	ate: 👔	/25	12	<u> </u>				Page	2;	<u> </u>	(of		╛
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Phone:		Fax:						Can								dection	100	23	1/21	1
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PORT OF EVERETT PROJECT

Cardno
Everett, Washington
Libby Project # L210125-50

Client Project # 031447

3322 South Bay Road NE Olympia, WA 98506

Phone: (360) 352-2110 FAX: (360) 352-4154

Email: libbyenv@gmail.com

Analyses of Gasoline (NWTPH-Gx) in Soil

Sample	Date	Date	Dilution	Surrogate	Gasoline
Number	Collected	Analyzed		Recovery (%)	(mg/kg)
Method Blank	N/A	1/25/2021		85	nd
S-9.5-EB31	1/25/2021	1/25/2021	10	81	<100
S-15-EB33	1/25/2021	1/25/2021		70	nd
S-12.5-EB33	1/25/2021	1/25/2021	100	90	<1000
S-10-EB34	1/25/2021	1/25/2021		88	nd
S-12.5-EB34	1/25/2021	1/25/2021		93	nd
S-12.5-SB4	1/25/2021	1/25/2021	5	79	< 50
S-15-SB4	1/25/2021	1/25/2021		95	nd
S-15-SB4 Dup	1/25/2021	1/25/2021		95	nd
S-17.5-SB4	1/25/2021	1/25/2021		92	nd
S-20-SB4	1/25/2021	1/25/2021	2	86	< 20
Practical Quantitation Limit					10

[&]quot;<" Indicates elevated PQL due to dilution.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE (Toluene-d8): 65% TO 135%

[&]quot;nd" Indicates not detected at the listed detection limits.

[&]quot;int" Indicates that interference prevents determination.

PORT OF EVERETT PROJECT

Cardno Everett, Washington

Libby Project # L210125-50

Client Project # 031447

3322 South Bay Road NE

Olympia, WA 98506 Phone: (360) 352-2110

FAX: (360) 352-4154

Email: libbyenv@gmail.com

Analyses of Diesel & Oil (NWTPH-Dx/Dx Extended) in Soil w/ Silica Gel Cleanup

Sample	Date	Date	Surrogate	Diesel	Oil
Number	Collected	Analyzed	Recovery (%)	(mg/kg)	(mg/kg)
Method Blank	N/A	1/25/2021	100	nd	nd
S-9.5-EB31	1/25/2021	1/25/2021	int	3400	nd
S-9.5-EB31 Dup	1/25/2021	1/25/2021	int	3500	nd
S-15-EB33	1/25/2021	1/25/2021	117	150	nd
S-12.5-EB33	1/25/2021	1/25/2021	int	21000 E	nd
S-10-EB34	1/25/2021	1/25/2021	int	2100	nd
S-12.5-EB34	1/25/2021	1/25/2021	int	1600	760
S-12.5-SB4	1/25/2021	1/25/2021	int	1700	nd
S-15-SB4	1/25/2021	1/25/2021	84	56	nd
S-17.5-SB4	1/25/2021	1/25/2021	94	nd	nd
S-20-SB4	1/25/2021	1/25/2021	int	610	nd
Practical Quantitation Limit				50	250

[&]quot;E" Indicates reported value is an estimate because it exceeds the calibration range.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE (2-F Biphenyl): 65% TO 135%

[&]quot;nd" Indicates not detected at the listed detection limits.

[&]quot;int" Indicates that interference prevents determination.

PORT OF EVERETT PROJECT

Cardno

Everett, Washington

Libby Project # L210125-50

Client Project # 031447

3322 South Bay Road NE

Olympia, WA 98506

Phone: (360) 352-2110 FAX: (360) 352-4154

Email: libbyenv@gmail.com

Analyses of Gasoline (NWTPH-Gx) in Soil

Sample	Date	Date	Dilution	Surrogate	Gasoline
Number	Collected	Analyzed		Recovery (%)	(mg/kg)
Method Blank	N/A	1/28/2021		91	nd
Method Blank	N/A	1/29/2021		134	nd
S-7.5-EB31	1/25/2021	1/29/2021		115	nd
S-5-EB31	1/25/2021	1/29/2021		122	nd
S-5-EB33	1/25/2021	1/29/2021		122	nd
S-7.5-EB33	1/25/2021	1/29/2021		107	nd
S-10-EB33	1/25/2021	1/29/2021	8	126	<40
S-7.5-EB34	1/25/2021	1/28/2021		91	nd
S-15-EB34	1/25/2021	1/28/2021		68	nd
S-17.5-EB34	1/25/2021	1/28/2021		92	nd
S-20-EB34	1/25/2021	1/28/2021		66	nd
S-5-EB35	1/25/2021	1/28/2021		82	nd
S-7.5-EB35	1/25/2021	1/28/2021		89	nd
S-10-EB35	1/25/2021	1/29/2021		129	nd
Practical Quantitation Limit					10

[&]quot;<" Indicates elevated PQL due to dilution.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE (Toluene-d8): 65% TO 135%

[&]quot;nd" Indicates not detected at the listed detection limits.

[&]quot;int" Indicates that interference prevents determination.

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Cardno Everett, Washington

Libby Project # L210125-50 Client Project # 031447 3322 South Bay Road NE Olympia, WA 98506

Phone: (360) 352-2110 FAX: (360) 352-4154

Email: libbyenv@gmail.com

Analyses of Gasoline (NWTPH-Gx) in Soil

Sample	Date	Date	Dilution	Surrogate	Gasoline
Number	Collected	Analyzed		Recovery (%)	(mg/kg)
S-12.5-EB35	1/25/2021	1/29/2021	3	111	<15
S-12.5-EB35 Dup	1/25/2021	1/29/2021	3	115	<15
S-15-EB35	1/25/2021	1/29/2021		120	nd
S-5-SB4	1/25/2021	1/28/2021		91	nd
S-5-SB4 Dup	1/25/2021	1/28/2021		90	nd
S-7.5-SB4	1/25/2021	1/28/2021		91	nd
S-10-SB4	1/25/2021	1/28/2021		77	nd
S-10-SB4 Dup	1/25/2021	1/28/2021		97	nd
Practical Quantitation Limit					10

[&]quot;<" Indicates elevated PQL due to dilution.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE (Toluene-d8): 65% TO 135%

[&]quot;nd" Indicates not detected at the listed detection limits.

[&]quot;int" Indicates that interference prevents determination.

PORT OF EVERETT PROJECT

Cardno Everett, Washington

Libby Project # L210125-50

Client Project # 031447

3322 South Bay Road NE

Olympia, WA 98506

Phone: (360) 352-2110

FAX: (360) 352-4154

Email: libbyenv@gmail.com

Analyses of Diesel & Oil (NWTPH-Dx/Dx Extended) in Soil w/ Silica Gel Cleanup

Sample	Date	Date	Dilution	Surrogate	Diesel	Oil
Number	Collected	Analyzed		Recovery (%)	(mg/kg)	(mg/kg)
Method Blank	N/A	2/1/2021		100	nd	nd
Method Blank	N/A	1/29/2021		102	nd	nd
Method Blank	N/A	1/28/2021		101	nd	nd
S-7.5-EB31	1/25/2021	1/29/2021		89	nd	nd
S-7.5-EB31 Dup	1/25/2021	1/29/2021		89	nd	nd
S-5-EB31	1/25/2021	1/29/2021		122	nd	nd
S-5-EB33	1/25/2021	1/29/2021		114	nd	nd
S-7.5-EB33	1/25/2021	2/1/2021		101	nd	nd
S-7.5-EB33 Dup	1/25/2021	2/1/2021		101	nd	nd
S-10-EB33	1/25/2021	2/1/2021	10	98	28000	1580
S-7.5-EB34	1/25/2021	1/29/2021		106	nd	nd
S-15-EB34	1/25/2021	1/29/2021		105	nd	nd
S-17.5-EB34	1/25/2021	1/29/2021		74	nd	nd
S-20-EB34	1/25/2021	1/29/2021		118	nd	nd
S-5-EB35	1/25/2021	1/28/2021		84	nd	nd
S-7.5-EB35	1/25/2021	1/29/2021		89	nd	nd
S-10-EB35	1/25/2021	1/29/2021		120	nd	nd
S-10-EB35 Dup	1/25/2021	1/29/2021		119	nd	nd
Practical Quantita	tion Limit				50	250

[&]quot;nd" Indicates not detected at the listed detection limits.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE (2-F Biphenyl): 65% TO 135%

ANALYSES PERFORMED BY: Jenny Anderson

[&]quot;int" Indicates that interference prevents determination.

3322 South Bay Road NE

Olympia, WA 98506

Phone: (360) 352-2110

FAX: (360) 352-4154 Email: libbyenv@gmail.com

PORT OF EVERETT PROJECT Cardno Everett, Washington Libby Project # L210125-50

Client Project # 031447

Analyses of Diesel & Oil (NWTPH-Dx/Dx Extended) in Soil w/ Silica Gel Cleanup

Sample	Date	Date	Dilution	Surrogate	Diesel	Oil
Number	Collected	Analyzed		Recovery (%)	(mg/kg)	(mg/kg)
S-12.5-EB35	1/25/2021	2/1/2021		104	520	430
S-15-EB35	1/25/2021	1/29/2021		113	nd	nd
S-5-SB4	1/25/2021	1/29/2021		86	nd	nd
S-7.5-SB4	1/25/2021	1/29/2021		105	nd	nd
S-10-SB4	1/25/2021	1/29/2021		int	3900	nd
Practical Quantit	50	250				

[&]quot;nd" Indicates not detected at the listed detection limits.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE (2-F Biphenyl): 65% TO 135%

ANALYSES PERFORMED BY: Jenny Anderson

[&]quot;int" Indicates that interference prevents determination.

PORT OF EVERETT PROJECT Cardno Everett, Washington Libby Project # L210125-50

Client Project # 031447

3322 South Bay Road NE

Olympia, WA 98506

Phone: (360) 352-2110 FAX: (360) 352-4154

Email: libbyenv@gmail.com

CCV Gasoline by NWTPH-Gx in Soil

Sample	Date	Gasoline	CCV Recovery	CCV Recovery Limits
Number	Analyzed	(mg/kg)	(%)	(%)
CCV Yahtzee PID 1 50 ppm	1/25/2021	56.9	114%	80-120%
Practical Quantitation Limit		10		

ANALYSES PERFORMED BY: Paul Burke

CCV Gasoline by NWTPH-Gx in Soil

Sample	Date	Gasoline	CCV Recovery	CCV Recovery Limits
Number	Analyzed	(mg/kg)	(%)	(%)
CCV Yahtzee PID 1 50 ppm	1/28/2021	59.7	119%	80-120%
CCV Yahtzee PID 1 50 ppm	1/29/2021	58.6	117%	80-120%
Practical Quantitation Limit		10		

PORT OF EVERETT PROJECT

Cardno
Everett, Washington
Libby Project # L210125-50
Client Project # 031447

3322 South Bay Road NE Olympia, WA 98506 Phone: (360) 352-2110 FAX: (360) 352-4154

Email: libbyenv@gmail.com

CCV Diesel by NWTPH-Dx in Soil

Sample	Date	Diesel	CCV Recovery	CCV Recovery Limits
Number	Analyzed	(mg/kg)	(%)	(%)
CCV Maru FID 1 500 ppm	1/25/2021	505	101%	85-115%
CCV Maru FID 2 500 ppm	1/25/2021	557	111%	85-115%
CCV Elmer FID 1 500 ppm	1/25/2021	547	109%	85-115%
CCV Elmer FID 2 500 ppm	1/25/2021	558	112%	85-115%
Practical Quantitation Limit		50		

ANALYSES PERFORMED BY: Paul Burke

CCV Diesel by NWTPH-Dx in Soil

Sample	Date	Diesel	CCV Recovery	CCV Recovery Limits
Number	Analyzed	(mg/kg)	(%)	(%)
CCV Stella FID 1 500 ppm	1/28/2021	516	103%	85-115%
CCV Stella FID 2 500 ppm	1/28/2021	503	101%	85-115%
CCV Stella FID 3 500 ppm	1/28/2021	430	86%	85-115%
CCV Stella FID 1 500 ppm	1/29/2021	542	108%	85-115%
CCV Stella FID 2 500 ppm	1/29/2021	472	94%	85-115%
CCV Stella FID 3 500 ppm	1/29/2021	449	90%	85-115%
CCV Kilvan FID 1 500 ppm	2/1/2021	433	87%	85-115%
Practical Quantitation Limit		50		

ANALYSES PERFORMED BY: Jenny Anderson

Libby Environn	nental	, Inc.		ुः CI	nain (of Cus	tody Re	ecor	d			www.	LibbyEnvi	ronmental.com
4139 Libby Road NE Olympia, WA 98506		360-352-4 360-352-4				Date:	1/26/	21			Page:	1	of	2_
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10 5-5-582	5	0940	5	Same			l k	1						
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PORT OF EVERETT PROJECT

Cardno
Everett, Washington

Libby Project # L210126-50 Client Project # 031447 3322 South Bay Road NE

Olympia, WA 98506 Phone: (360) 352-2110 FAX: (360) 352-4154

Email: libbyenv@gmail.com

Analyses of Gasoline (NWTPH-Gx) in Soil

Sample	Date	Date	Surrogate	Gasoline
Number	Collected	Analyzed	Recovery (%)	(mg/kg)
Method Blank	N/A	1/25/2021	85	nd
Method Blank	N/A	1/26/2021	83	nd
S-10-EB36	1/26/2021	1/26/2021	78	nd
S-10-EB36 Dup	1/26/2021	1/26/2021	79	nd
S-10-SB1	1/26/2021	1/26/2021	72	nd
S-12.5-SB1	1/26/2021	1/26/2021	84	nd
S-15-SB1	1/26/2021	1/26/2021	73	nd
S-10-SB2	1/26/2021	1/26/2021	75	nd
S-12.5-SB2	1/26/2021	1/26/2021	74	nd
S-10-SB3	1/26/2021	1/26/2021	92	nd
Practical Quantitation Limit				10

[&]quot;nd" Indicates not detected at the listed detection limits.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE (Trifluorotoluene): 65% TO 135%

[&]quot;int" Indicates that interference prevents determination.

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Everett, Washington
Libby Project # L210126-50

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FAX: (360) 352-4154 Email: libbyenv@gmail.com

Analyses of Gasoline (NWTPH-Gx) in Soil

Sample	Date	Date	Surrogate	Gasoline
Number	Collected	Analyzed	Recovery (%)	(mg/kg)
S-12.5-SB3	1/26/2021	1/26/2021	69	nd
S-15-SB5	1/26/2021	1/26/2021	86	nd
S-17.5-SB5	1/26/2021	1/26/2021	91	nd
S-17.5-SB5 Dup	1/26/2021	1/26/2021	90	nd
S-7.5-EB40	1/26/2021	1/26/2021	71	nd
S-10-EB32	1/25/2021	1/26/2021	85	nd
S-12.5-EB32	1/25/2021	1/25/2021	79	nd
Practical Quantitation Limit				10

[&]quot;nd" Indicates not detected at the listed detection limits.

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[&]quot;int" Indicates that interference prevents determination.

PORT OF EVERETT PROJECT Cardno Everett, Washington Libby Project # L210126-50 Client Project # 031447 3322 South Bay Road NE Olympia, WA 98506 Phone: (360) 352-2110 FAX: (360) 352-4154 Email: libbyenv@gmail.com

Analyses of Diesel & Oil (NWTPH-Dx/Dx Extended) in Soil w/ Silica Gel Cleanup

Sample	Date	Date	Surrogate	Diesel	Oil
Number	Collected	Analyzed	Recovery (%)	(mg/kg)	(mg/kg)
Method Blank	N/A	1/25/2021	100	nd	nd
Method Blank	N/A	1/26/2021	79	nd	nd
S-10-EB36	1/26/2021	1/26/2021	91	nd	nd
S-10-EB36 Dup	1/26/2021	1/26/2021	90	nd	nd
S-10-SB1	1/26/2021	1/26/2021	91	nd	nd
S-12.5-SB1	1/26/2021	1/26/2021	91	nd	nd
S-15-SB1	1/26/2021	1/26/2021	83	nd	nd
S-10-SB2	1/26/2021	1/26/2021	96	nd	nd
S-12.5-SB2	1/26/2021	1/26/2021	82	nd	nd
S-10-SB3	1/26/2021	1/26/2021	116	130	680
Practical Quantitation I	Limit			50	250

[&]quot;nd" Indicates not detected at the listed detection limits.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE (2-F Biphenyl): 65% TO 135%

[&]quot;int" Indicates that interference prevents determination.

PORT OF EVERETT PROJECT Cardno

Libby Project # L210126-50 Client Project # 031447

Everett, Washington

3322 South Bay Road NE Olympia, WA 98506 Phone: (360) 352-2110 FAX: (360) 352-4154 Email: libbyenv@gmail.com

Analyses of Diesel & Oil (NWTPH-Dx/Dx Extended) in Soil w/ Silica Gel Cleanup

Sample	Date	Date	Surrogate	Diesel	Oil
Number	Collected	Analyzed	Recovery (%)	(mg/kg)	(mg/kg)
S-12.5-SB3	1/26/2021	1/26/2021	90	nd	nd
S-15-SB5	1/26/2021	1/26/2021	108	82	580
S-17.5-SB5	1/26/2021	1/26/2021	93	nd	nd
S-7.5-EB40	1/26/2021	1/26/2021	91	nd	nd
S-10-EB32	1/25/2021	1/25/2021	int	6200	nd
S-12.5-EB32	1/25/2021	1/25/2021	int	410	nd
S-12.5-EB32 Dup	1/25/2021	1/25/2021	int	380	nd
Practical Quantitation	Limit			50	250

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ACCEPTABLE RECOVERY LIMITS FOR SURROGATE (2-F Biphenyl): 65% TO 135%

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Olympia, WA 98506 Phone: (360) 352-2110 FAX: (360) 352-4154

Email: libbyenv@gmail.com

Analyses of Gasoline (NWTPH-Gx) in Soil

Sample	Date	Date	Surrogate	Gasoline
Number	Collected	Analyzed	Recovery (%)	(mg/kg)
Method Blank	N/A	1/28/2021	91	nd
Method Blank	N/A	1/29/2021	134	nd
S-5-EB36	1/26/2021	1/28/2021	100	nd
S-7.5-EB36	1/26/2021	1/28/2021	83	nd
S-12.5-EB36	1/26/2021	1/28/2021	109	nd
S-5-SB1	1/26/2021	1/29/2021	114	nd
S-7.5-SB1	1/26/2021	1/29/2021	111	nd
S-7.5-SB1 Dup	1/26/2021	1/29/2021	122	nd
S-5-SB2	1/26/2021	1/28/2021	103	nd
S-7.5-SB2	1/26/2021	1/28/2021	108	nd
S-15-SB2	1/26/2021	1/28/2021	110	nd
S-5-SB3	1/26/2021	1/30/2021	88	nd
S-7.5-SB3	1/26/2021	1/29/2021	76	nd
Practical Quantitation Limit				10

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ACCEPTABLE RECOVERY LIMITS FOR SURROGATE (Trifluorotoluene): 65% TO 135%

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Email: libbyenv@gmail.com

Analyses of Gasoline (NWTPH-Gx) in Soil

Sample	Date	Date	Surrogate	Gasoline
Number	Collected	Analyzed	Recovery (%)	(mg/kg)
S-15-SB3	1/26/2021	1/29/2021	128	nd
S-20-SB3	1/26/2021	1/29/2021	126	nd
S-5-SB5	1/26/2021	1/29/2021	125	nd
S-10-SB5	1/26/2021	1/30/2021	96	nd
S-7.5-SB5	1/26/2021	1/30/2021	102	nd
S-12.5-SB5	1/26/2021	1/30/2021	68	nd
S-12.5-SB5 Dup	1/26/2021	1/30/2021	87	nd
S-20-SB5	1/26/2021	1/30/2021	74	nd
S-5-EB40	1/26/2021	1/30/2021	79	nd
S-10-EB40	1/26/2021	1/30/2021	79	nd
S-12.5-EB40	1/26/2021	1/30/2021	112	nd
Practical Quantitation Limit				10

[&]quot;nd" Indicates not detected at the listed detection limits.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE (Trifluorotoluene): 65% TO 135%

[&]quot;int" Indicates that interference prevents determination.

PORT OF EVERETT PROJECT

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Everett, Washington

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Client Project # 031447

3322 South Bay Road NE Olympia, WA 98506

Phone: (360) 352-2110 FAX: (360) 352-4154

Email: libbyenv@gmail.com

Analyses of Diesel & Oil (NWTPH-Dx/Dx Extended) in Soil w/ Silica Gel Cleanup

Sample	Date	Date	Surrogate	Diesel	Oil
•			•		
Number	Collected	Analyzed	Recovery (%)	(mg/kg)	(mg/kg)
Method Blank	N/A	2/1/2021	100	nd	nd
Method Blank	N/A	1/29/2021	102	nd	nd
Method Blank	N/A	1/28/2021	102	nd	nd
S-5-EB36	1/26/2021	1/29/2021	104	nd	nd
S-5-EB36 Dup	1/26/2021	1/29/2021	102	nd	nd
S-7.5-EB36	1/26/2021	1/29/2021	104	nd	nd
S-12.5-EB36	1/26/2021	1/28/2021	103	nd	nd
S-5-SB1	1/26/2021	1/29/2021	103	nd	nd
S-7.5-SB1	1/26/2021	2/1/2021	103	110	660
S-5-SB2	1/26/2021	2/1/2021	100	nd	790
S-7.5-SB2	1/26/2021	1/29/2021	101	nd	nd
S-15-SB2	1/26/2021	1/29/2021	98	nd	nd
S-5-SB3	1/26/2021	2/1/2021	98	440	2200
S-7.5-SB3	1/26/2021	2/1/2021	103	nd	nd
Practical Quantitation Limit				50	250

[&]quot;nd" Indicates not detected at the listed detection limits.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE (2-F Biphenyl): 65% TO 135%

ANALYSES PERFORMED BY: Jenny Anderson

[&]quot;*" Indicates Product in light diesel range.

[&]quot;int" Indicates that interference prevents determination.

PORT OF EVERETT PROJECT

Cardno Everett, Washington

Libby Project # L210126-50 Client Project # 031447 Phone: (360) 352-2110 FAX: (360) 352-4154

3322 South Bay Road NE

Olympia, WA 98506

Email: libbyenv@gmail.com

Analyses of Diesel & Oil (NWTPH-Dx/Dx Extended) in Soil w/ Silica Gel Cleanup

Sample	Date	Date	Surrogate	Diesel	Oil
Number	Collected	Analyzed	Recovery (%)	(mg/kg)	(mg/kg)
S-15-SB3	1/26/2021	1/29/2021	94	nd	nd
S-20-SB3	1/26/2021	1/29/2021	96	nd	nd
S-20-SB3 Dup	1/26/2021	1/29/2021	98	nd	nd
S-5-SB5	1/26/2021	1/29/2021	91	nd	1630
S-10-SB5	1/26/2021	1/29/2021	94	nd	760
S-7.5-SB5	1/26/2021	1/29/2021	96	nd	nd
S-12.5-SB5	1/26/2021	1/29/2021	93	nd	nd
S-20-SB5	1/26/2021	1/29/2021	99	nd	nd
S-5-EB40	1/26/2021	1/29/2021	107	490 *	nd
S-10-EB40	1/26/2021	1/29/2021	102	nd	nd
S-12.5-EB40	1/26/2021	1/29/2021	96	nd	nd
Practical Quantitation Limit				50	250

[&]quot;nd" Indicates not detected at the listed detection limits.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE (2-F Biphenyl): 65% TO 135%

ANALYSES PERFORMED BY: Jenny Anderson

[&]quot;*" Indicates Product in light diesel range.

[&]quot;int" Indicates that interference prevents determination.

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Cardno
Everett, Washington
Libby Project # L210126-50
Client Project # 031447

3322 South Bay Road NE Olympia, WA 98506

Phone: (360) 352-2110 FAX: (360) 352-4154

Email: libbyenv@gmail.com

CCV Gasoline by NWTPH-Gx in Soil

Sample	Date	Gasoline	CCV Recovery	CCV Recovery Limits
Number	Analyzed	(mg/kg)	(%)	(%)
CCV Yahtzee PID 1 50 ppm	1/26/2021	53.3	107%	80-120%
Practical Quantitation Limit		50		

ANALYSES PERFORMED BY: Paul Burke

CCV Gasoline by NWTPH-Gx in Soil

Sample	Date	Gasoline	CCV Recovery	CCV Recovery Limits
Number	Analyzed	(mg/kg)	(%)	(%)
CCV Yahtzee PID 1 50 ppm	1/28/2021	59.7	119%	80-120%
CCV Yahtzee PID 1 50 ppm	1/29/2021	58.6	117%	80-120%
CCV Yahtzee PID 1 50 ppm	1/30/2021	52.1	104%	80-120%
Practical Quantitation Limit		50		

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Everett, Washington
Libby Project # L210126-50
Client Project # 031447

3322 South Bay Road NE Olympia, WA 98506 Phone: (360) 352-2110 FAX: (360) 352-4154

Email: libbyenv@gmail.com

CCV Diesel by NWTPH-Dx in Soil

Sample	Date	Diesel	CCV Recovery	CCV Recovery Limits
Number	Analyzed	(mg/kg)	(%)	(%)
CCV Maru FID 1 500 ppm	1/26/2021	521	104%	85-115%
CCV Maru FID 2 500 ppm	1/26/2021	556	111%	85-115%
CCV Elmer FID 1 500 ppm	1/26/2021	570	114%	85-115%
CCV Elmer FID 2 500 ppm	1/26/2021	531	106%	85-115%
Practical Quantitation Limit		50		

ANALYSES PERFORMED BY: Paul Burke

CCV Diesel by NWTPH-Dx in Soil

Sample	Date	Diesel	CCV Recovery	CCV Recovery Limits
Number	Analyzed	(mg/kg)	(%)	(%)
CCV Stella FID 1 500 ppm	1/28/2021	516	103%	85-115%
CCV Stella FID 2 500 ppm	1/28/2021	503	101%	85-115%
CCV Stella FID 3 500 ppm	1/28/2021	430	86%	85-115%
CCV Stella FID 1 500 ppm	1/29/2021	542	108%	85-115%
CCV Stella FID 2 500 ppm	1/29/2021	472	94%	85-115%
CCV Stella FID 3 500 ppm	1/29/2021	449	90%	85-115%
CCV Kilvan FID 1 500 ppm	2/1/2021	433	87%	85-115%
Practical Quantitation Limit		50		

ANALYSES PERFORMED BY: Jenny Anderson

Libby Environr	nental,	Inc.		Cr	ain	of (Custod	y Re	cor	d			WWW	LibbyE	nvironmenta	al.com
4139 Libby Road NE Olympia, WA 98506	Fax: 3	360-352-2 360-352-4				Da	le:	12-	1/2	-/	Page	e:	_/	of	2	_
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12 5-5-EB39	5	LUD	5	Same				X	X							
13 5-12,5 EB37	12.5	1635	5	Same				4	1+							
14 S-2.5-EB39		1105	5	Same				*	1							
15 5-12,5+1339		105	3	Same				~	1							
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17 5-2.5-EB38		1040	5	Same	A			人	+							
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Libby Environm	nental	, Inc.		Ci	nain	of Cus	stody	Rec	or	d				WWW	LibbyEn	vironmental.co
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11 5-15- EB 32 A	15	1510	5	Same				H	1							
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13 5-20- EB32A	20	1520	5	Same			X		x							
14 5-5- EBY	5	1525	5	Same			X		X							
15 S-1.5 €B41	7.5	1530	5	Same			1 1		*							
16 5-10 - ERY	10	1535	1	Some			1		x							
17 5-12.5- EB41	125	(540	>	Saine		1	1 3		X							
Relinquished by Bey H	1/27	/Time	600	Received by	Pak	1/21/		e / Time / 600		Sample	Rec	eipt:		Remarks	s not	Marked
Relinquished by:	Date	/Time		Received by			Dat	e / Time		Good Con	dition?			140b	hum	chi teun
										Guld?				WI ZIE	100	JA JUN
Relinguished by:	Oate	/ Time		Received by:			Dat	e / Time		Seals Intac	17					
										Total Numi	ber of (Container	8	TAT: 2	HR 4	ISHR 5-DA

PORT OF EVERETT PROJECT

Cardno Everett, Washington

Libby Project # L210127-50

Client Project # 031447

3322 South Bay Road NE

Olympia, WA 98506

Phone: (360) 352-2110 FAX: (360) 352-4154

Email: libbyenv@gmail.com

Analyses of Gasoline (NWTPH-Gx) in Soil

Sample	Date	Date	Dilution	Surrogate	Gasoline
Number	Collected	Analyzed		Recovery (%)	(mg/kg)
Method Blank	N/A	1/27/2021		88	nd
S-15-EB31A	1/27/2021	1/27/2021	10	75	<100
S-7.5-EB37	1/27/2021	1/27/2021		76	nd
S-7.5-EB37 Dup	1/27/2021	1/27/2021		69	nd
S-10-EB37	1/27/2021	1/27/2021		84	nd
S-7.5-EB38	1/27/2021	1/27/2021		88	nd
S-10-EB38	1/27/2021	1/27/2021		83	nd
S-15-EB38	1/27/2021	1/27/2021		82	nd
S-7.5-EB39	1/27/2021	1/27/2021	5	82	< 50
S-10-EB39	1/27/2021	1/27/2021		94	nd
S-15-EB39	1/27/2021	1/27/2021		79	nd
Practical Quantitation Limit					10

[&]quot;<" Indicates elevated PQL due to dilution.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE (Trifluorotoluene): 65% TO 135%

[&]quot;nd" Indicates not detected at the listed detection limits.

[&]quot;int" Indicates that interference prevents determination.

PORT OF EVERETT PROJECT

Cardno
Everett, Washington
Libby Project # L210127-50

Client Project # 031447

3322 South Bay Road NE Olympia, WA 98506 Phone: (360) 352-2110

FAX: (360) 352-4154 Email: libbyenv@gmail.com

Analyses of Gasoline (NWTPH-Gx) in Soil

Sample	Date	Date	Dilution	Surrogate	Gasoline
Number	Collected	Analyzed		Recovery (%)	(mg/kg)
S-20-EB39	1/27/2021	1/27/2021		81	nd
S-20-EB39 Dup	1/27/2021	1/27/2021		76	nd
S-20-EB33	1/25/2021	1/27/2021		85	nd
S-17.5-EB33	1/25/2021	1/27/2021		83	nd
S-17.5-EB31B	1/27/2021	1/27/2021		66	nd
S-20-EB31B	1/27/2021	1/27/2021		89	nd
S-17.5-EB32A	1/27/2021	1/27/2021		91	nd
Practical Quantitation Limit					10

[&]quot;<" Indicates elevated PQL due to dilution.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE (Trifluorotoluene): 65% TO 135%

[&]quot;nd" Indicates not detected at the listed detection limits.

[&]quot;int" Indicates that interference prevents determination.

PORT OF EVERETT PROJECT

Cardno

Everett, Washington Libby Project # L210127-50

Client Project # 031447

Olympia, WA 98506 Phone: (360) 352-2110 FAX: (360) 352-4154

3322 South Bay Road NE

Email: libbyenv@gmail.com

Analyses of Diesel & Oil (NWTPH-Dx/Dx Extended) in Soil w/ Silica Gel Cleanup

Sample	Date	Date	Surrogate	Diesel	Oil
Number	Collected	Analyzed	Recovery (%)	(mg/kg)	(mg/kg)
Method Blank	N/A	1/27/2021	93	nd	nd
S-10-EB32	1/25/2021	1/27/2021	int	4700	nd
S-12.5-EB32	1/25/2021	1/27/2021	int	340	nd
S-12.5-EB32 Dup	1/25/2021	1/27/2021	int	430	nd
S-15-EB31A	1/27/2021	1/27/2021	int	7000 E	nd
S-7.5-EB37	1/27/2021	1/27/2021	103	nd	nd
S-10-EB37	1/27/2021	1/27/2021	103	nd	nd
S-7.5-EB38	1/27/2021	1/27/2021	92	nd	nd
S-10-EB38	1/27/2021	1/27/2021	98	nd	nd
S-10-EB38 Dup	1/27/2021	1/27/2021	103	nd	nd
S-15-EB38	1/27/2021	1/27/2021	101	nd	nd
S-7.5-EB39	1/27/2021	1/27/2021	int	2200	nd
S-10-EB39	1/27/2021	1/27/2021	95	nd	nd
S-10-EB39 Dup	1/27/2021	1/27/2021	98	nd	nd
S-15-EB39	1/27/2021	1/27/2021	97	nd	nd
Practical Quantitation Limit				50	250

[&]quot;E" Indicates reported value is an estimate because it exceeds the calibration range.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE (2-F Biphenyl): 65% TO 135%

[&]quot;nd" Indicates not detected at the listed detection limits.

[&]quot;int" Indicates that interference prevents determination.

3322 South Bay Road NE

Olympia, WA 98506

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FAX: (360) 352-4154 Email: libbyenv@gmail.com

PORT OF EVERETT PROJECT Cardno

Everett, Washington Libby Project # L210127-50

Client Project # 031447

Analyses of Diesel & Oil (NWTPH-Dx/Dx Extended) in Soil w/ Silica Gel Cleanup

Sample	Date	Date	Surrogate	Diesel	Oil
Number	Collected	Analyzed	Recovery (%)	(mg/kg)	(mg/kg)
S-20-EB39	1/27/2021	1/27/2021	97	nd	nd
S-20-EB33	1/25/2021	1/27/2021	102	nd	310
S-17.5-EB33	1/25/2021	1/27/2021	104	63	nd
S-17.5-EB31B	1/27/2021	1/27/2021	108	nd	nd
S-20-EB31B	1/27/2021	1/27/2021	96	nd	nd
S-17.5-EB32A	1/27/2021	1/27/2021	115	nd	nd
Practical Quantitation Limit				50	250

[&]quot;E" Indicates reported value is an estimate because it exceeds the calibration range.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE (2-F Biphenyl): 65% TO 135%

[&]quot;nd" Indicates not detected at the listed detection limits.

[&]quot;int" Indicates that interference prevents determination.

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Client Project # 031447

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Phone: (360) 352-2110 FAX: (360) 352-4154

Email: libbyenv@gmail.com

Analyses of Gasoline (NWTPH-Gx) in Soil

Sample	Date	Date	Dilution	Surrogate	Gasoline
Number	Collected	Analyzed		Recovery (%)	(mg/kg)
Method Blank	N/A	1/29/2021		133	nd
Method Blank	N/A	1/30/2021		119	nd
S-5-EB39	1/27/2021	1/30/2021		113	nd
S-12.5-EB37	1/27/2021	1/29/2021		99	nd
S-2.5-EB39	1/27/2021	1/30/2021		110	nd
S-12.5-EB39	1/27/2021	1/29/2021		79	nd
S-5-EB38	1/27/2021	1/29/2021		99	nd
S-2.5-EB38	1/27/2021	1/29/2021		104	nd
Practical Quantitation Limit					10

[&]quot;<" Indicates elevated PQL due to dilution.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE (Trifluorotoluene): 65% TO 135%

ANALYSES PERFORMED BY: Melissa Harrington

[&]quot;nd" Indicates not detected at the listed detection limits.

[&]quot;int" Indicates that interference prevents determination.

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Email: libbyenv@gmail.com

Analyses of Gasoline (NWTPH-Gx) in Soil

Sample	Date	Date	Dilution	Surrogate	Gasoline
Number	Collected	Analyzed		Recovery (%)	(mg/kg)
S-12.5-EB38	1/27/2021	1/30/2021		119	nd
S-5-EB37	1/27/2021	1/29/2021		84	nd
S-5-EB32A	1/27/2021	1/29/2021		130	nd
S-7.5-EB32A	1/27/2021	1/29/2021	5	98	<25
S-10-EB32A	1/27/2021	1/30/2021		109	nd
S-15-EB32A	1/27/2021	1/30/2021		103	nd
S-15-EB32A Dup	1/27/2021	1/30/2021		110	nd
S-20-EB32A	1/27/2021	1/29/2021		99	nd
S-5-EB41	1/27/2021	1/30/2021	3	65	<15
S-7.5-EB41	1/27/2021	1/30/2021		96	nd
S-10-EB41	1/27/2021	1/30/2021		130	nd
S-12.5-EB41	1/27/2021	1/29/2021		102	nd
S-12.5-EB41 Dup	1/27/2021	1/29/2021		72	nd
Practical Quantitation Limit					10

[&]quot;<" Indicates elevated PQL due to dilution.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE (Trifluorotoluene): 65% TO 135%

ANALYSES PERFORMED BY: Melissa Harrington

[&]quot;nd" Indicates not detected at the listed detection limits.

[&]quot;int" Indicates that interference prevents determination.

PORT OF EVERETT PROJECT

Cardno

Everett, Washington

Libby Project # L210127-50

Client Project # 031447

3322 South Bay Road NE

Olympia, WA 98506 Phone: (360) 352-2110

FAX: (360) 352-4154

Email: libbyenv@gmail.com

Analyses of Diesel & Oil (NWTPH-Dx/Dx Extended) in Soil w/ Silica Gel Cleanup

Sample	Date	Date	Dilution	Surrogate	Diesel	Oil
Number	Collected	Analyzed	211441011	Recovery (%)	(mg/kg)	(mg/kg)
Method Blank	N/A	1/28/2021		72	nd	nd
Method Blank	N/A	1/29/2021		94	nd	nd
Method Blank	N/A	2/1/2021		86	nd	nd
Method Blank	N/A	2/2/2021		106	nd	nd
Method Blank	N/A	2/3/2021		106	nd	nd
S-5-EB39	1/27/2021	2/1/2021	2	109	5600	nd
S-5-EB39	1/27/2021	2/3/2021		int	4500	nd
S-12.5-EB37	1/27/2021	1/29/2021		99	nd	nd
S-2.5-EB39	1/27/2021	2/1/2021		105	2200	nd
S-12.5-EB39	1/27/2021	1/29/2021		98	nd	nd
S-5-EB38	1/27/2021	1/29/2021		97	nd	nd
S-2.5-EB38	1/27/2021	2/1/2021		105	nd	490
Practical Quantitat	ion Limit				50	250

[&]quot;nd" Indicates not detected at the listed detection limits.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE (2-F Biphenyl): 65% TO 135%

ANALYSES PERFORMED BY: Jenny Anderson

[&]quot;int" Indicates that interference prevents determination.

PORT OF EVERETT PROJECT

Cardno

Everett, Washington

Libby Project # L210127-50

Client Project # 031447

3322 South Bay Road NE

Olympia, WA 98506 Phone: (360) 352-2110

FAX: (360) 352-4154

Email: libbyenv@gmail.com

Analyses of Diesel & Oil (NWTPH-Dx/Dx Extended) in Soil w/ Silica Gel Cleanup

Sample	Date	Date	Dilution	Surrogate	Diesel	Oil
Number	Collected	Analyzed		Recovery (%)	(mg/kg)	(mg/kg)
S-12.5-EB38	1/27/2021	1/29/2021		97	nd	nd
S-5-EB37	1/27/2021	1/29/2021		98	nd	nd
S-5-EB32A	1/27/2021	1/29/2021		98	56	nd
S-7.5-EB32A	1/27/2021	2/1/2021		109	2040	290
S-7.5-EB32A Dup	1/27/2021	2/1/2021		106	2300	340
S-10-EB32A	1/27/2021	2/2/2021	2	95	6100	nd
S-15-EB32A	1/27/2021	1/29/2021		96	nd	nd
S-20-EB32A	1/27/2021	1/29/2021		98	nd	nd
S-5-EB41	1/27/2021	2/2/2021	2	97	9300	6700
S-7.5-EB41	1/27/2021	2/1/2021		107	630	310
S-10-EB41	1/27/2021	1/29/2021		99	nd	nd
S-12.5-EB41	1/27/2021	1/29/2021		97	nd	nd
Practical Quantitati	on Limit				50	250

[&]quot;nd" Indicates not detected at the listed detection limits.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE (2-F Biphenyl): 65% TO 135%

ANALYSES PERFORMED BY: Jenny Anderson

[&]quot;int" Indicates that interference prevents determination.

PORT OF EVERETT PROJECT Cardno Everett, Washington Libby Project # L210127-50 Client Project # 031447 3322 South Bay Road NE Olympia, WA 98506 Phone: (360) 352-2110 FAX: (360) 352-4154 Email: libbyenv@gmail.com

CCV Gasoline by NWTPH-Gx in Soil

Sample	Date	Gasoline	CCV Recovery	CCV Recovery Limits
Number	Analyzed	(mg/kg)	(%)	(%)
CCV Yahtzee PID 1 50 ppm	1/27/2021	56.9	114%	80-120%
Practical Quantitation Limit		50		

ANALYSES PERFORMED BY: Paul Burke

CCV Gasoline by NWTPH-Gx in Soil

Sample	Date	Gasoline	CCV Recovery	CCV Recovery Limits
Number	Analyzed	(mg/kg)	(%)	(%)
CCV Yahtzee PID 1 50 ppm	1/29/2021	58.6	117%	80-120%
CCV Yahtzee PID 1 50 ppm	1/30/2021	51.0	102%	80-120%
Practical Quantitation Limit		50		

ANALYSES PERFORMED BY: Melissa Harrington

PORT OF EVERETT PROJECT

Cardno
Everett, Washington
Libby Project # L210127-50
Client Project # 031447

3322 South Bay Road NE Olympia, WA 98506 Phone: (360) 352-2110 FAX: (360) 352-4154 Email: libbyenv@gmail.com

CCV Diesel by NWTPH-Dx in Soil

Sample	Date	Diesel	CCV Recovery	CCV Recovery Limits
Number	Analyzed	(mg/kg)	(%)	(%)
CCV Maru FID 1 500 ppm	1/27/2021	505	101%	85-115%
CCV Maru FID 2 500 ppm	1/27/2021	557	111%	85-115%
CCV Elmer FID 1 500 ppm	1/27/2021	547	109%	85-115%
CCV Elmer FID 2 500 ppm	1/27/2021	558	112%	85-115%
Practical Quantitation Limit		50		

ANALYSES PERFORMED BY: Paul Burke

CCV Diesel by NWTPH-Dx in Soil

Sample	Date	Diesel	CCV Recovery	CCV Recovery Limits
Number	Analyzed	(mg/kg)	(%)	(%)
CCV Stella FID 1 500 ppm	1/28/2021	516	103%	85-115%
CCV Stella FID 2 500 ppm	1/28/2021	503	101%	85-115%
CCV Stella FID 3 500 ppm	1/28/2021	430	86%	85-115%
CCV Stella FID 1 500 ppm	1/29/2021	542	108%	85-115%
CCV Stella FID 2 500 ppm	1/29/2021	472	94%	85-115%
CCV Stella FID 3 500 ppm	1/29/2021	449	90%	85-115%
CCV Kilvan FID 1 500 ppm	1/29/2021	520	104%	85-115%
CCV Kilvan FID 1 500 ppm	2/1/2021	433	87%	85-115%
CCV Kilvan FID 1 500 ppm	2/2/2021	425	85%	85-115%
CCV Stella FID 2 500 ppm	2/3/2021	439	88%	85-115%
Practical Quantitation Limit		50		

ANALYSES PERFORMED BY: Jenny Anderson

Libby Environn	nental,	Inc.		C	nain (of Cus	tody	Re	cor	d				ww	w.Libbyl	Environ	nental.com
4139 Libby Road NE Olympia, WA 98506		60-352-2 60-352-4				Date: 2	1/5/	21_				P	age:		c	of	1
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Phone:		Fax:				Collector	r:					D	ate of	Collectio	n: 2/57	/21	
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75-5-587		945					X		70		\top						
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PORT OF EVERETT PROJECT

Cardno
Everett, Washington
Libby Project # L210205-50
Client Project # 031447

3322 South Bay Road NE Olympia, WA 98506 Phone: (360) 352-2110 FAX: (360) 352-4154 Email: libbyenv@gmail.com

Analyses of Gasoline (NWTPH-Gx) in Soil

Sample	Date	Date	Surrogate	Gasoline
Number	Collected	Analyzed	Recovery (%)	(mg/kg)
Method Blank	2/5/2021	2/5/2021	86	nd
S-2.5-SB6	2/5/2021	2/5/2021	66	nd
S-5-SB6	2/5/2021	2/5/2021	97	nd
S-7.5-SB6	2/5/2021	2/5/2021	97	nd
S-10-SB6	2/5/2021	2/5/2021	91	nd
S-12.5-SB6	2/5/2021	2/5/2021	82	nd
S-12.5-SB6 Dup	2/5/2021	2/5/2021	67	nd
S-15-SB6	2/5/2021	2/5/2021	86	nd
S-15-SB6 Dup	2/5/2021	2/5/2021	73	nd
S-5-SB7	2/5/2021	2/5/2021	67	nd
S-7.5-SB7	2/5/2021	2/5/2021	97	nd
S-10-SB7	2/5/2021	2/5/2021	79	nd
S-12.5-SB7	2/5/2021	2/5/2021	91	nd
S-15-SB7	2/5/2021	2/5/2021	88	nd
Practical Quantitation Limit				10

[&]quot;nd" Indicates not detected at the listed detection limits.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE (Trifluorotoluene): 65% TO 135%

[&]quot;int" Indicates that interference prevents determination.

PORT OF EVERETT PROJECT

Cardno

Everett, Washington

Libby Project # L210205-50

Client Project # 031447

3322 South Bay Road NE

Olympia, WA 98506

Phone: (360) 352-2110

FAX: (360) 352-4154 Email: libbyenv@gmail.com

Analyses of Diesel & Oil (NWTPH-Dx/Dx Extended) in Soil w/ Silica Gel Cleanup

Sample	Date	Date	Surrogate	Diesel	Oil
Number	Collected	Analyzed	Recovery (%)	(mg/kg)	(mg/kg)
Method Blank	2/5/2021	2/5/2021	132	nd	nd
S-2.5-SB6	2/5/2021	2/5/2021	int	2800	nd
S-5-SB6	2/5/2021	2/5/2021	98	57	nd
S-7.5-SB6	2/5/2021	2/5/2021	94	nd	nd
S-10-SB6	2/5/2021	2/5/2021	89	nd	nd
S-12.5-SB6	2/5/2021	2/5/2021	95	nd	nd
S-12.5-SB6 Dup	2/5/2021	2/5/2021	94	nd	nd
S-15-SB6	2/5/2021	2/5/2021	88	nd	nd
S-15-SB6 Dup	2/5/2021	2/5/2021	81	nd	nd
S-5-SB7	2/5/2021	2/5/2021	83	nd	nd
S-7.5-SB7	2/5/2021	2/5/2021	98	nd	nd
S-10-SB7	2/5/2021	2/5/2021	83	nd	nd
S-12.5-SB7	2/5/2021	2/5/2021	91	nd	nd
S-15-SB7	2/5/2021	2/5/2021	88	nd	nd
Practical Quantitation Limit				50	250

[&]quot;nd" Indicates not detected at the listed detection limits.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE (2-F Biphenyl): 65% TO 135%

[&]quot;int" Indicates that interference prevents determination.

PORT OF EVERETT PROJECT Cardno Everett, Washington Libby Project # L210205-50 Client Project # 031447 3322 South Bay Road NE Olympia, WA 98506 Phone: (360) 352-2110 FAX: (360) 352-4154

Email: libbyenv@gmail.com

CCV Gasoline by NWTPH-Gx in Soil

Sample	Date	Gasoline	CCV Recovery	CCV Recovery Limits
Number	Analyzed	(mg/kg)	(%)	(%)
CCV Yahtzee PID 1 50 ppm	2/5/2021	54.5	109%	80-120%
Practical Quantitation Limit		50		

PORT OF EVERETT PROJECT Cardno

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Phone: (360) 352-2110 FAX: (360) 352-4154

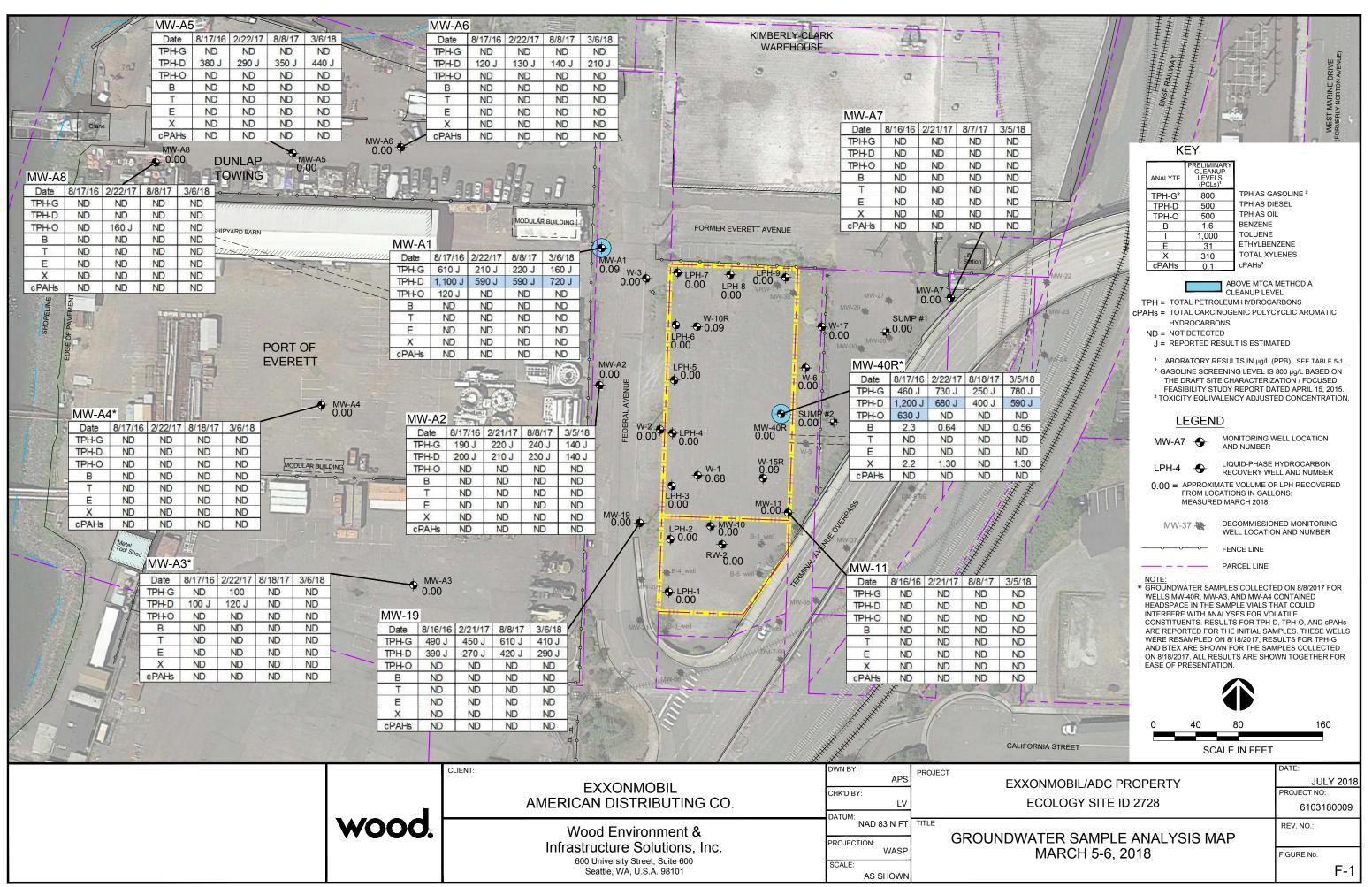
Email: libbyenv@gmail.com

CCV Diesel by NWTPH-Dx in Soil

Sample	Date	Diesel	CCV Recovery	CCV Recovery Limits	
Number	Analyzed	(mg/kg)	(%)	(%)	
CCV Elmer FID 1 500 ppm	2/5/2021	502	100%	85-115%	
CCV Elmer FID 2 500 ppm	2/5/2021	534	107%	85-115%	
Practical Quantitation Limit		50			

APPENDIX G

GROUNDWATER SAMPLE ANALYSIS MAP, MARCH 5-6, 2018



APPENDIX H

SIMPLIFIED
TERRESTRIAL
ECOLOGICAL
EVALUATION



Table 749-1 Simplified Terrestrial Ecological Evaluation-Exposure Analysis Procedure

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

Notes for Table 749-1

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

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

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

High: Area is ecologically significant for one or more of the following reasons:

Late-successional native plant communities present; relatively high species diversity; used by an uncommon or rare species; priority habitat (as defined by the Washington Department of fish and Wildlife); part of a larger area of habitat where size or fragmentation may be important for the retention of some species.

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

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

[Area Calculation Aid] [Aerial Photo with Area Designations] [TEE Table 749-1] [Index of Tables]

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

[TEE Home]

APPENDIX I

FRIEDMAN AND BRUYA, INC., REPORT



January 21, 2015

Project 6103150009

Mr. Chung Yee Washington State Department of Ecology Headquarters Toxics Cleanup Program P.O. Box 47600 Olympia, Washington 98504-7600

Subject: Change in Project Laboratory

ExxonMobil/ADC Property, Ecology Site ID 2728 2717/2731 Federal Avenue, Everett, Washington

Ecology Agreed Order DE-6184

Dear Mr. Yee:

Amec Foster Wheeler Environment & Infrastructure, Inc. (Amec Foster Wheeler), has prepared this letter on behalf of ExxonMobil Oil Corporation (ExxonMobil) and American Distributing Company (ADC) for the ExxonMobil/ADC Site located at 2717/2731 Federal Avenue in Everett, Washington (the Site). The purpose of this letter is to inform the Washington Department of Ecology (Ecology) that the project laboratory used for analysis of Site samples is being changed from TestAmerica Inc. (TestAmerica) to Eurofins Calscience Environmental Laboratories, located in Garden Grove, California (Eurofins). Both analytical laboratories are accredited by Ecology for the soil and groundwater analyses performed for the Site. This document details discrepancies that were recently identified in analytical results obtained for groundwater samples analyzed for total petroleum hydrocarbons (TPH) in the diesel range (TPH-D) by TestAmerica. These TPH-D analytical discrepancies and the results of a comparative study of TPH analytical results reported by TestAmerica and Eurofins are presented and discussed below. An independent evaluation of analytical results from both TestAmerica and Eurofins was also performed by an Ecology-accredited third-party analytical laboratory, Friedman & Bruya, Inc. (Friedman & Bruya), of Seattle, Washington. The results of that independent evaluation are included with this letter as Attachment A.

Starting in January 2015, soil, groundwater, and waste samples collected from the Site will be analyzed by Eurofins Calscience Environmental Laboratories, located in Garden Grove, California. Samples will no longer be submitted to TestAmerica for analysis.

1.0 BACKGROUND

TestAmerica has been the project laboratory for analysis of soil and groundwater samples collected at the Site since 2006. Semiannual groundwater monitoring results for individual wells reported by TestAmerica have been consistent during this time (AMEC, 2014). Results from TestAmerica over the past several years of monitoring using Method NWTPH-Dx with silica gel treatment (SGT) have consistently shown elevated levels for TPH-D in several wells, as noted by the summary of semiannual monitoring data for TPH presented in Table 1. The monitoring well locations are shown on the attached Figure 1. Elevated TPH-D levels have been consistently reported for downgradient wells



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MW-A1, MW-A2, MW-A3, MW-A4, MW-A5, and MW-A6, and for the wells located near the source areas (MW-19 and MW-40R). Elevated levels of TPH in the motor oil range (TPH-O) were also reported for some wells during several semiannual sampling events. Table 1 summarizes TPH-D and TPH-O results reported by TestAmerica using Method NWTPH-Dx with SGT for semiannual groundwater monitoring samples collected from these eight wells since 2009.

As part of our work to prepare the Site Characterization/Focused Feasibility Study (SC/FFS) for the Site, samples were collected from downgradient monitoring wells MW-A5 and MW-A6 in May 2014 for analysis of extractable petroleum hydrocarbons (EPH) and volatile petroleum hydrocarbons (VPH) using Ecology methods NWTPH-EPH and NWTPH-VPH. The groundwater samples were submitted to TestAmerica for these analyses. Monitoring wells MW-A5 and MW-A6 were selected for EPH/VPH testing because they are downgradient from the source area on the ExxonMobil/ADC property and because of the relatively high TPH-D and TPH-O concentrations that had been reported for these wells during previous sampling events. The TPH-D concentrations had consistently been in the range of 1,000–3,000 micrograms per liter (μ g/L) in MW-A5 since 2010 and in MW-A6 since 2011 (Table 1).

The EPH/VPH results reported by TestAmerica for the May 2014 groundwater samples wells showed results that were generally below the laboratory reporting limits for the various petroleum hydrocarbon fractions. These EPH/VPH results were entered into the Ecology MTCATPH11.1 spreadsheet to calculate the site-specific cleanup levels. The output from the MTCATPH11.1 spreadsheet indicated that the groundwater TPH levels in these wells were below the MTCA Method A cleanup level and approximately one order of magnitude less than the historic TPH-D results shown in Table 1 for wells MW-A5 and MW-A6. Due to these inconsistent results, ExxonMobil and ADC felt it was warranted to collect additional data to assess TPH concentrations in these wells and to explain the discrepancy in analytical results for EPH/VPH versus TPH-D.

The purpose of the comparative laboratory assessment presented here was to ascertain the reason for the discrepancy in results for petroleum hydrocarbons obtained by TestAmerica using Method NWTPH-Dx with SGT versus Methods NWTPH-EPH and NWTPH-VPH. The study design and results are described below.

2.0 COMPARATIVE EVALUATION DESIGN

A multi-faceted approach was implemented to evaluate the cause of discrepancy in TPH results. The approach comprised the following elements:

- An additional round of groundwater samples were collected from monitoring wells MW-A5 and MW-A6 in June 2014 for analyses.
- The samples collected in June 2014 were split in the field, and the split samples were submitted to two separate, Ecology-accredited laboratories (TestAmerica and Eurofins) for analysis of TPH-D, TPH-O, EPH, VPH, polycyclic aromatic hydrocarbons (PAHs), and selected volatile organic compounds (VOCs).
- Results of the June 2014 split sampling were evaluated for variation between the two laboratories.



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- Split samples were collected during the scheduled semiannual sampling event in August 2014 from the full network of monitoring wells included in the semiannual sampling program. These split samples were submitted to TestAmerica and Eurofins for analysis of the semiannual monitoring parameters, which include TPH in the gasoline range (TPH-G), TPH-D, TPH-O, PAHs, and selected VOCs.
- Additional rounds of split samples were collected monthly from wells MW-A2, MW-A4, MW-A5, MW-A6, and MW-40R from September through December 2014. These split samples were also submitted to TestAmerica and Eurofins for analysis of TPH-D, TPH-O, PAHs, and selected VOCs. Starting with the September 2014 sampling event, analyses using method NWTPH-Dx were conducted both with and without SGT.
- A third, independent, Ecology-accredited laboratory (Friedman & Bruya) was retained to
 evaluate the analytical results obtained by the two laboratories for the split samples
 collected in June, August, and September 2014. Friedman & Bruya also reviewed the
 standard operating procedures (SOPs) used by the two laboratories for TPH analyses.
- Statistical analysis was conducted on the laboratory analytical results from the split samples to characterize the differences in analytical results reported by the two laboratories.

The wells sampled and analyzed for the comparative evaluation are summarized in Table 2. Additional details on the sampling program are described below.

2.1 Sampling and Analysis

Samples were collected and analyzed as described in Table 2. The samples were split in the field and analyzed by two Ecology-accredited laboratories: TestAmerica and Eurofins. The groundwater samples were collected in accordance with the routine groundwater sampling protocols that have been used at the Site.

Field Duplicates

Field duplicates were collected at monitoring wells MW-A5 and MW-A6 in June 2014. These field duplicate samples were not split; the duplicate was submitted only to the normal project laboratory, TestAmerica. Field duplicates were collected from monitoring well MW-A2 during the sampling events conducted in August through December, and these field duplicates were also split and submitted to both laboratories. All of the field duplicates were submitted with blind sample IDs.

Analytical Methods

The analyses conducted and the analytical methods used are summarized in Table 2. Silica gel treatment (SGT) of groundwater samples has been conducted routinely for Site samples since February 2008; the data shown in Table 1 reflect results that include SGT as part of the analytical method. As noted above, as part of this evaluation, both laboratories analyzed several rounds of samples for TPH both with and without SGT.



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Data Evaluation Methods

Laboratory data were subjected to statistical testing using open source R applications. Laboratory results and the natural logarithm (base *e*) of the results for TPH-D were tested for a normal distribution using the Shapiro-Wilk normality test (*W* statistic). Based on the results of this test, the data were found to be log-normally distributed, and the natural logarithm of the values for TPH-D from the two laboratories were then evaluated using a paired *t*-test to determine if the differences in results produced from the two test laboratories were statistically significant. Analytical results were also compared by calculating the relative percent difference (RPD) in results between the two laboratories; the RPD was calculated for each data pair by dividing the difference between the two results by the average of the results and expressing the result as percent. Results were included in the statistical analyses only when the analyte was detected at both laboratories.

3.0 RESULTS

Results from the comparative evaluation study described above are presented on Tables 3, 4, and 5:

- Table 3: EPH and VPH results for June 19; 2014
- Table 4: TPH-G, TPH-D, and TPH-O results; and
- Table 5: PAHs and VOCs results.

The complete analytical data reports are included in Attachment B.

3.1 Results of the June 2014 Split Samples

Split samples collected in June 2014 from MW-A5 and MW-A6 were analyzed for EPH, VPH, PAHs, and both TPH-D and TPH-O using the SGT procedure.

- The results from the EPH/VPH analyses (Table 3) confirmed the low TPH concentrations reported by TestAmerica for the May 2014 EPH/VPH analyses. Results for EPH and VPH from the two laboratories were in generally good agreement, indicating that TPH concentrations were below cleanup levels.
- Results for TPH-D analyses (which included routine SGT) and TPH-O showed widely varying results between the two laboratories (Table 4). Results reported by TestAmerica were greater by factors of up to 9 for MW-A5 and 25 for MW-A6. Moreover, the results for duplicate samples reported by TestAmerica varied greatly (3,360 and 272 μg/L for MW-A5 and 3,270 and 2,550 μg/L for MW-A6).
- Results for VOCs and PAHs were very similar between the two labs. Most individual PAH compounds were not detected in either laboratory, although Eurofins analyzed for only a selected suite of compounds. TestAmerica reported higher concentrations of acenaphthene than Eurofins, but the reported concentrations were low. VOCs were not detected by either laboratory. The consistency of the results for EPH/VPH, VOCs, and PAHs indicates that all samples analyzed were representative of the same medium.



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3.2 Results of Monthly Split Samples

Results for TPH-G, PAHs, and VOCs reported by the two laboratories for the monthly split samples generally show good agreement between the two laboratories (Tables 4 and 5). TPH-G was not reported in most samples analyzed, and when detected was present at low concentrations. Very few PAH compounds were detected above the reporting limit. When detected, individual PAHs were most often detected in the corresponding samples by both laboratories. In the few instances when PAHs were detected at only one lab, concentrations were very low and generally near or below the reporting limit specified by the other laboratory. Few VOC detections were reported and generally only at very low concentrations near or below the practical quantitation limit (PQL). Importantly, when individual PAH or VOC constituents were detected, they were often detected by both laboratories, confirming that the split samples represent the same medium.

As found in the June sampling event, the TPH-D and THP-O results in the August through December 2014 sampling vary widely between the two laboratories, in many cases by an order of magnitude or more (Table 4). The results for TPH-D presented in Table 4 show that the results reported by Eurofins were consistently lower than results reported by TestAmerica. These differences are noted for results with and without SGT, but the differences are more pronounced for samples analyzed using SGT.

3.3 Third-Party Review by Friedman & Bruya, Inc.

Freidman & Bruya, Inc. (Friedman & Bruya), was retained as an independent third party with expertise in TPH analytical methods. For both TestAmerica and Eurofins, Friedman & Bruya reviewed the analytical laboratory reports, chromatograms from TPH analyses, and standard analytical procedures for extraction, silica gel treatment, and TPH analysis. They were asked to provide an opinion on the nature and causes of the discrepancy in TPH results obtained by the two test laboratories (TestAmerica and Eurofins). Friedman & Bruya is an environmental laboratory located in Seattle, Washington, and is accredited by Ecology to perform analyses using the analytical methods used for this investigation. The independent review provided by Freidman & Bruya is included as Attachment A.

Friedman & Bruya provided the following findings:

- TPH-D results reported by Eurofins after SGT were much lower than results reported by TestAmerica for the corresponding samples.
- The low levels of EPH in comparison to TPH reported by both laboratories suggest that the much of the organic material present in the groundwater samples analyzed by both laboratories is polar.
- These high levels of polar compounds in samples are interfering with the TPH analyses.
- Both laboratories reported higher test results for TPH-D following SGT than for EPH, suggesting that the SGT procedures used by both laboratories are inadequate for removing polar compound interference from these samples.
- The discrepancy in results from both laboratories between EPH and TPH-D with SGT suggest that the column SGT method used in the EPH analysis is more effective than the



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shake SGT method that is used by both laboratories for TPH-D analysis for removing polar compound interference.

- The low results reported for the EPH/VPH analyses show that very low concentrations of TPH were present in the groundwater samples tested for EPH/VPH.
- SGT of groundwater samples from the Site is appropriate because of the high concentrations of polar compounds in the groundwater, which is the source of the high TPH concentrations historically reported by TestAmerica.
- The TPH-D results following SGT reported by Eurofins more closely resemble the results of the EPH/VPH results reported by both laboratories.

As noted in the Friedman & Bruya report, SGT is needed to remove interference caused by polar compounds in Site groundwater. The prescribed SGT method specified in the NWTPH-Dx analytical procedure is a shake method and the SGT method prescribed for NWTPH-EPH analysis is a column method. Friedman & Bruya conclude that the column SGT method used in EPH analysis was more effective in removing polar compound interference for this Site, and thus, the low TPH results from EPH analysis observed in the May and June samples are representative of Site conditions.

3.4 Data Quality Review

The TestAmerica and Eurofins data packages were reviewed for data quality by Amec Foster Wheeler. This review was conducted in accordance with procedures used routinely for the Site. The data quality review memoranda are included as Attachment B. In general, TestAmerica data shows trends of a higher frequency of out of compliance laboratory quality control samples which can bias the environmental samples either high or low and indicates the laboratory has difficulty performing the requested analyses. In comparison, the Eurofins data review did not identify out of compliance laboratory quality control samples; however, two samples were qualified due to incomparable field duplicate results.

Results for analyses on samples collected at wells MW-A4 and MW-A5 on November 20, 2014, were rejected due to an error on the part of the shipping company; these samples were received by one of the project laboratories several days after the samples had been collected and at a temperature exceeding the maximum temperature established under project quality control criteria. These wells were resampled on December 5, 2014, so that true split samples were analyzed for comparison. Results from December 5, 2014, are reported and evaluated here.

3.5 Statistical Analysis of Laboratory Results

Statistical analysis was performed by Amec Foster Wheeler to assess differences in results reported by the two laboratories. Statistical testing included direct comparison of results from the two laboratories using RPD, testing for distribution normality using the Shapiro-Wilk test, and comparison of results from the two laboratories using the paired t-test. Results from these tests are presented below. Details for the Shapiro-Wilk testing and the paired t-test are included in Attachment C.

RPD was calculated for results reported by both laboratories that are at least five times greater than the reporting limit. The resulting RPDs are presented in Table 6. An RPD of 30 percent is often used



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as a generally acceptable RPD for groundwater field duplicate samples; therefore, this value can be used as a guideline for comparing results from the two labs.

The RPDs listed in Table 6 for analytical results other than TPH-D and TPH-O are mostly acceptable. The RPD data in Table 6 show that results from the two laboratories for TPH-G and VOCs (benzene and total xylenes) were in very good agreement. For PAH analyses, results for 40 of the 69 individual results (i.e., 58 percent) were within the 30 percent criterion for field duplicate samples. For the 26 TPH-D results, RPDs were within the 30 percent criterion for only 3 sets of results, and RPDs ranged from 48 percent to 183 percent for the remaining 88 percent of the paired results (Table 6).

Table 7 presents a statistical summary of the RPD values in Table 6. The data in Table 7 show that the average RPD for TPH-G, VOCs, and PAHs were below or very near the 30 percent field duplicate criterion, whereas the average RPD for TPH-D was 95 percent. The RPD results for TPH-G, VOCs, and PAHs indicate that the split samples analyzed at the two laboratories were valid field duplicates. The RPD results for TPH-D and TPH-O indicate that the analyses for the two labs were in very poor agreement for these analytes.

Additional statistical testing was conducted to evaluate the significance of the differences in results for TPH-D following SGT reported by the two laboratories. The raw input data and statistical output from the statistical analysis run are presented in Attachment C.

The Shapiro-Wilk normality test showed the TPH-D results from both laboratories to be log-normally distributed (W = 0.94 and 0.94 and p = 0.090 and 0.14 for TestAmerica and Eurofins, respectively) (see Attachment C). Based on these results, both data sets were log-transformed for further statistical testing. The log-transformed laboratory results for TPH-D from the two laboratories were then subjected to a paired t-test to assess the statistical significance of the differences. The paired t-test indicated that the differences between the two sets of results were highly significant (t-value = 7.3; p = 7.5 x 10⁻⁸), with a mean difference of 1.32 in the natural logarithm of the reported data (corresponding to a factor of approximately 3.7. In other words, results from TestAmerica were on average approximately 3.7 times higher than results reported by Eurofins for the same split sample. The t-test results indicate that the two sets of TPH-D results are statistically distinct and independent sets of data.

4.0 DISCUSSION

Ecology guidance specifies that SGT should be used in cases where high levels of naturally occurring organic matter are present (Ecology 2011). As shown by results of the EPH analyses in comparison with TPH-D results without SGT, large quantities of polar organic compounds are the reason that elevated levels of TPH-D has historically been reported by TestAmerica in many samples from groundwater monitoring wells at the Site, including the downgradient wells. The potential for polar compounds unrelated to petroleum to be present in Site groundwater, especially downgradient of the ExxonMobil/ADC property, is consistent with the history of this area. The Site was originally developed on the shoreline of Port Gardner Bay, which originally consisted of lowlands, as evidenced by the peat deposits present beneath the Site east of Federal Avenue. In addition, historic fire insurance maps prepared by Sanborn indicate the on-property areas east of Federal Avenue were a marsh prior to development.



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The area west of Federal Avenue was subsequently filled to create the current shoreline. Precise sources of fill material are unknown, but likely included dredge spoils, natural wood debris from historic log-rafting and storage along the Port Gardner Bay shoreline, peat, and other material potentially containing high levels of organic material. These sources, as well as the native marsh and nearshore mud flat deposits, would be expected to contribute large amounts of natural organic matter that contributes to the presence of significant concentrations of polar organic material in Site groundwater.

5.0 CONCLUSIONS

Based on the results from the comparative evaluation of laboratory results reported by TestAmerica and Eurofins and the independent review by Friedman & Bruya, the following conclusions are made:

- Results of analyses of split samples reported by TestAmerica and Eurofins showed good agreement for TPH-G, PAHs, VOCs, and EPH/VPH, indicating that the split samples are representative of the medium being addressed (i.e., groundwater at the ExxonMobil/ADC Site) and that the split samples are valid field duplicates.
- Results reported by TestAmerica for TPH-D analyses were routinely greater than results
 obtained by Eurofins for the same split sample. Based on statistical analysis of the results
 for TPH-D with SGT, TestAmerica reported results that were on average approximately
 4 times greater than results reported by Eurofins.
- Groundwater samples from many of the Site monitoring wells contain high concentrations
 of polar organic compounds that interfere with TPH-D analyses. SGT is appropriate for
 removal of the interfering compounds as part of TPH-D analyses.
- TPH-D results for both labs showed a significant discrepancy relative to results for EPH, with TPH-D results greater than EPH results. Friedman & Bruya attributed this difference to more effective removal of polar compounds by the column SGT method employed for the EPH analyses compared with the shake method used by the two laboratories for TPH-D analyses. Friedman & Bruya concluded that EPH method results are more representative of TPH-D concentrations in groundwater at the Site.
- The shake SGT method employed by TestAmerica and Eurofins for TPH-D analyses achieved partial removal of polar compounds that interfere with TPH-D analyses; the SGT procedure employed by Eurofins appears to remove more of the interfering polar compounds than the procedure used by TestAmerica, as their TPH-D results were consistently lower.
- TPH-D results reported by Eurofins are more representative of the actual hydrocarbon content of samples, as based on results from EPH testing by both laboratories. The TPH-D results in downgradient MWs-A4, A5, and A6 are below MTCA Method A cleanup levels.
- Friedman & Bruya recommended the use of the column SGT procedure for analyses of TPH samples for this Site based on the high concentrations of polar compounds that are interfering with the TPH-D analyses.



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> Results from the comparative evaluation suggest that TestAmerica had consistently been reporting inappropriately high TPH results for the downgradient monitoring wells due to interference by polar compounds present in Site groundwater.

6.0 CLOSURE

Based on the results of this evaluation and the recommendations provided by Friedman & Bruya, future laboratory testing for the ExxonMobil/ADC Site will be conducted by Eurofins. Results from Eurofins for TPH-D more closely matched results of EPH analyses, which is the more representative indicator for the presence of hydrocarbons at the Site. Eurofins is accredited by Ecology for all of the analytical methods used for the semiannual sampling events.

Sincerely yours,

Amec Foster Wheeler Environment & Infrastructure, Inc.

Leah Vigoren Project Manager

Leals 12. Vigin

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LV:lpm

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Washington State Department of Ecology (Ecology), 2011, Guidance for remediation of petroleum contaminated sites, Toxics Cleanup Program Publication No. 10-09-057, September.

E-mail:

Enclosures: Table 1 – Selected Historical Analytical Results for Total Petroleum Hydrocarbons

Table 2 – Comparative Study Schedule

Table 3 – Results for EPH/VPH Analyses June 2014

Table 4 – Analytical Results for TPH in Split Groundwater Samples

Table 5 – Analytical Results for PAHs and VOCs in Split Groundwater Samples

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Table 6 – Relative Percent Differences in Results between Laboratories

Table 7 – Summary Statistics for Relative Percent Differences in Results between Laboratories

Figure 1 – Monitoring Well Network

Attachment A – Friedman & Bruya Assessment

Attachment B – Laboratory Data Reports and Data Validation Memoranda

Attachment C – Statistical Data Input and Program Output





SELECTED HISTORICAL ANALYTICAL RESULTS FOR TOTAL PETROLEUM HYDROCARBONS^{1, 2}

ExxonMobil/ADC Property, Ecology Site ID 2728 Everett, Washington

					1	<u> </u>	
		TPH-Diesel	TPH-Oil			TPH-Diesel	TPH-Oil
Well ID	Date Sampled	(µg/L)	(µg/L)	Well ID	Date Sampled	(µg/L)	(µg/L)
MTCA N	lethod A CUL ³	500	500	MTCA	Method A CUL ³	500	500
	3/1/2010	854	585		2/26/2010	2,400	499
	3/1/2010 (dup.)	824	563		8/18/2010	1,720	233
	8/18/2010	346 J	137 J		11/17/2010	2,010	97.1 U
	8/18/2010 (dup.)	508 J	323 J		11/17/2010 (dup.)	1,880	95.2 U
	11/18/2010	488	172		2/17/2011	1,720 J	421 N
	2/17/2011	570 J	128 N		5/19/2011	1,540	468
NAVA 40	5/18/2011	274 NJ	26.2 NJ	MW-A2	11/28/2011	1,520	243 U
MW-19	11/29/2011	621	250 U		8/29/2012	965	133
	2/22/2012	512	250 U		2/21/2013	782	118
	8/29/2012	543	148		8/22/2013	826	93.9 J
	2/21/2013	354	111		2/25/2014	730	94.3 U
	8/22/2013	341	76.8 J		8/27/2014	565	95.7 UJ
	2/25/2014	239	571		8/27/2014 (dup.)	602	94.8 U
	8/27/2014	409	94.3 U		8/18/2010	335	226
	3/1/2010	3,790	1,270		11/18/2010	417	96.2 U
	8/18/2010	4,390	1,620		2/17/2011	791	220 N
	11/18/2010	1,970	413		5/19/2011	404 NJ	29.6 NJ
	2/17/2011	2,030 J	638 N		11/29/2011	643	248 U
	5/18/2011	1,540 NJ	208 NJ	MW-A3	2/22/2012	826	240 U
MW-40R	11/29/2011	1,720	248 U		8/29/2012	365	100 U
10100-4010	2/22/2012	1,690	295		2/21/2013	655	146
	8/29/2012	3,780 J	1,100 J		8/22/2013	864	341
	2/21/2013	792 J	113 J		2/25/2014	365	94.3 U
	8/22/2013	4,010	1,040		8/26/2014	906	442
	2/25/2014	1,550	203		8/18/2010	483	516
	8/27/2014	1,610 J	276 J		11/17/2010	585	396
	2/25/2010	3,390	545		2/17/2011	667	515 N
	8/18/2010	2,200	276		5/19/2011	416 NJ	215 NJ
	11/18/2010	2,140	95.2 U		11/29/2011	592	288
	2/18/2011	3,260	529 N	MW-A4	2/22/2012	580	525
MW-A1	5/18/2011	2,350 J	144 J		8/29/2012	635	356
1V1 V V - /- (1	11/28/2011	15,600	4,900 U		2/21/2013	708	472
	2/21/2012	4,530	847		8/22/2013	732	343
	8/29/2012	2,190	424		2/25/2014	590	223
	2/21/2013	802	103		8/26/2014	360	94.3 U
	8/27/2014	1,240	124				



SELECTED HISTORICAL ANALYTICAL RESULTS FOR TOTAL PETROLEUM HYDROCARBONS^{1, 2}

ExxonMobil/ADC Property, Ecology Site ID 2728 Everett, Washington

Well ID	Date Sampled	TPH-Diesel (µg/L)	TPH-Oil (µg/L)	Well ID	Date Sampled	TPH-Diesel (µg/L)	TPH-Oil (µg/L)
MTCA N	lethod A CUL 3	500	500	MTCA N	Method A CUL 3	500	500
	8/18/2010	2,070	288		8/18/2010	513	145
	11/17/2010	1,250 J	98.0 U		11/17/2010	796	94.3 J
	2/17/2011	2,800	523 N		2/17/2011	1,500	273 N
	5/19/2011	1,970	195		5/19/2011	1,370	224
	11/28/2011	1,880	243		11/29/2011	1,560	245 U
MW-A5	2/21/2012	2,480	250 U	MW-A6	2/21/2012	1,960	493
	8/29/2012	2,830	514		8/29/2012	2,020	357
	2/21/2013	2,930	380		2/21/2013	2,740	598
	8/22/2013	3,670	555		8/22/2013	2,800	612
	2/25/2014	2,480	200		2/25/2014	2,840	208
	8/26/2014	2,160	95.2 U		8/26/2014	2,430	174

Notes

- 1. Data qualifier flags are as follows:
 - J = The result is an approximation.
 - U = Analyte not detected at or above the reporting limit indicated.
 - UJ = Analyte was not detected above the reporting limit. Indicated value is estimated reporting limit.
 - N = presumptively identified due to spectral match issues.
 - NJ = presumptively identified due to spectral match issues.
- 2. All analtyical results by TestAmerica.
- 3. MTCA Method A Cleanup Level, TPH-Diesel = 500 μ g/L, MTCA Method A Cleanup Level, TPH-Oil = 500 μ g/L **Bold** indicates that the result is greater than MTCA Method A cleanup level.

Abbreviations

µg/L = microgram per liter
CUL = cleanup level
MTCA = Model Toxics Control Act

TPH = total petroleum hydrocarbons



COMPARATIVE STUDY SCHEDULE¹

ExxonMobil/ADC Property, Ecology Site ID 2728
Everett, Washington

Sampling Schedule	Wells Sampled	Analyses ²
June 2014	MA-A1 ³ MW-A2 ³ MW-A4 ³ MW-A5 MW-A6	EPH VPH TPH-D (C ₁₀ -C ₂₄) w/SGT TPH-D (C ₁₀ -C ₂₄) no/SGT (Eurofins only) TPH-O (C ₂₄ -C ₄₀) w/SGT PAHs Select VOCs
August 2014 (Semiannual Monitoring)	MW-A1 MW-A2 MW-A3 MW-A4 MW-A5 MW-A6 MW-A7 MW-A8 MW-11 MW-19 MW-40R	TPH-G (C ₆ -C ₁₂) TPH-D (C ₁₀ -C ₂₄) w/SGT TPH-O (C ₂₄ -C ₄₀) w/SGT PAHs Select VOCs
September 2014 October 2014 November 2014 December 2014	MW-A2 MW-A4 MW-A5 MW-A6 MW-40R	TPH-G (C ₆ -C ₁₂) TPH-D (C ₁₀ -C ₂₄) no/SGT TPH-D (C ₁₀ -C ₂₄) w/SGT TPH-O (C ₂₄ -C ₄₀) no/SGT TPH-O (C ₂₄ -C ₄₀) w/SGT TPH-O (C ₂₄ -C ₄₀) w/SGT PAHs Select VOCs

Notes:

- 1. Samples were split in the field for analysis at both TestAmerica and Eurofins, except as noted.
- 2. EPH analyzed by Method NWTPH-EPH.

VPH analyzed by Method NWTPH-VPH.

TPH-D and TPH-O analyzed by Method NWTPH-Dx with (w/SGT) or without (no SGT) silica gel treatment. TPH-G analyzed by Method NWTPH-Gx.

PAHs analyzed by EPA Method 8270D (Eurofins uses 8270C) with select ion monitoring. VOCs analyzed by EPA Method 8260B.

3. Analyzed only by TestAmerica and only for EPH/VPH.

Abbreviations:

EPA = U.S. Environmental Protection Agency

EPH = extractable petroleum hydrocarbons

PAHs = polycyclic aromatic hydrocarbons

SGT = silica gel treatment

TPH-G = total petroleum hydrocarbons in the gasoline range

TPH-D = total petroleum hydrocarbons in the diesel range

TPH-O = total petroleum hydrocarbons in the oil range

VOCs = volatile organic compounds

VPH = volatile petroleum hydrocarbons



RESULTS FOR EPH/VPH ANALYSES, JUNE 2014¹

ExxonMobil/ADC Property, Ecology Site ID 2728
Everett, Washington

Well ID	MW-A1	MW-A2	MW-A4		MW-A5 2			MW-A6	
Analytical Lab	TA	TA	TA	T.	A^2	EU	T/	A ²	EU
EPH (μg/L)									
C8-C10 Aliphatics	19.2 U	18.9 UR	19.2 UR	18.9 UR	19 UR	50 U	18.9 UR	18.7 UR	50 U
C8-C10 Aromatics	48.1 U	47.2 UJ	48.1 U	47.2 U	47.6 U	50 U	47.2 U	46.7 U	50 U
C10-C12 Aliphatics	9.62 U	17.4 J	9.62 UR	9.43 UR	9.52 UR	50 U	9.43 UR	9.35 UR	50 U
C10-C12 Aromatics	14.1	15.1 J	9.62 UJ	9.43 UJ	9.81 J	50 U	9.43 U	9.35 U	50 U
C12-C16 Aliphatics	28.8 U	28.5	28.8 U	28.3 U	28.6 U	50 U	28.3 U	28 U	50 U
C12-C16 Aromatics	75.6	37.7 UJ	38.5 U	37.7 U	38.1 U	50 U	37.7 U	37.4 U	50 U
C16-C21 Aliphatics	48.1 U	47.2 U	48.1 U	47.2 U	47.6 U	50 U	47.2 U	46.7 U	50 U
C16-C21 Aromatics	98.2	47.2 UJ	48.1 U	47.2 U	47.6 U	2.8	47.2 U	46.7 U	50 U
C21-C34 Aliphatics	48.1 U	47.2 U	48.1 U	47.2 U	47.6 U	50 U	47.2 U	68.5	50 U
C21-C34 Aromatics	48.1 U	47.2 UJ	48.1 U	47.2 U	47.6 U	16	47.2 U	46.7 U	50 U
VPH (μg/L)									
C5-C6 aliphatics (adjusted)	50 U	50 U	50 U	50 U	50 U	10 U	50 U	50 U	10 U
C6-C8 aliphatic (adjusted)	50 U	50 U	50 U	50 U	50 U	15 U	50 U	50 U	15 U
C8-C10 aliphatic (adjusted)	50 U	50 U	50 U	50 U	50 U	25 U	50 U	50 U	25 U
C8-C10 Aromatics	50 U	50 U	50 U	50 U	50 U	25 U	50 U	50 U	25 U
C10-C12 aliphatic (adjusted)	50 U	50 U	50 U	50 U	50 U	15 U	50 U	50 U	15 U
C10-C12 Aromatics	50 U	50 U	50 U	50 U	50 U	7.3	50 U	50 U	3.0
C12-C13 Aromatics	50 U	50 U	50 U	50 U	50 U	4.4	50 U	50 U	2.2

Notes:

- 1. Data qualifiers are as follows:
 - J = The result is an approximation.
 - U = Analyte not detected at or above the reporting limit indicated.
 - UJ = Analyte was not detected above the reporting limit. Indicated value is estimated reporting limit.
 - UR = Analyte was not detected at or above the reporting limit shown, but the result was rejected due to quality control issues.
- 2. The two results shown represent a primary and field duplicate sample.

Abbreviations:

μg/L = micrograms per liter

EPH = Extractable petroleum hydrocarbons

EU = Eurofins Calscience, Garden Grove, California

TA = TestAmerica, Nashville, Tennessee

VPH = Volatile petroleum hydrocarbons

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ANALYTICAL RESULTS FOR TPH IN SPLIT GROUNDWATER SAMPLES 1

ExxonMobil/ADC Property, Ecology Site ID 2728 Everett, Washington

all results in milligrams per liter (mg/L)



Well ID	N	/IW-A1											M	W-A2										
Date Sampled	6/19/2014	8/27	7/2014	6/19/2014		8/27/	2014			9/30/	2014			10/29	/2014			11/19	/2014			12/18	/2014	
Analytical Lab	TA	TA	EU	TA	TA ² EU ² 100 U 100 U 130 120		TA	2	E	J^2	TA	2	EU^2		TA	2	El	J ²	T.	A^2	El	J ²		
TPH-G (C6-C12)		100 U	630		100 U	100 U	130	120	100 U	500 U	130	140	156	160	180	180	146	100 U	150	160	178	165	140	160
TPH-D (C10-C24) no/SG									1,050	834	1200	350	1,190 J	3,000 J	500	550	938	999	220	300	849 J	952 J	320	340
TPH-D (C10-C24) w/SG	1,460	1,240	590	881	565	602	220	220	594 J	313 J	590 J	170 J	678 J	1,140 J	360	380	345 J	393	190	240	430 J	805 J	260	280
TPH-O (C24-C40) no/SG									168	181	320	100 U	305 J	784 J	100 U 1	100 U	197 J	284 J	100 U	100 U	158 J	164 J	100 U	100 U
TPH-O (C24-C40) w/SG	146	124	100 U	111	95.7 UJ	94.8 U	100 U	100 U	95.7 U	94.3 U	190	100 U	94.3 U	141	100 U 1	100 U	93.9 UJ	100 U	100 U	100 U	95.2 UJ	218 J	100 U	100 U

Well ID	MW-	A3					IV	IW-A4										MW-A5				
Date Sampled	8/26/2	014	6/19/2014	8/26/2	2014	9/30/	2014	10/29	/2014	12/5/	2014	12/18	3/2014		6/19/2014		8/26/	2014	9/30/2	2014	10/29	/2014
Analytical Lab	TA	EU	TA	TA	EU	TA	EU	TA	EU	TA	EU	TA	EU	Т	A^2	EU	TA	EU	TA	EU	TA	EU
TPH-G (C6-C12)	100 U	56 J		100 U	100 U	500 UJ	100 U	100 U	100 U	100 U	100 U	500 UJ	100 U				100 U	100 U	100 U	100 U	100 U	100 U
TPH-D (C10-C24) no/SG						768	86 J	1,340	210	849	100 U	281	100 U			590			155 J	310	4,500	790
TPH-D (C10-C24) w/SG	906	120	851	360	100 U	413	100 U	298	120	385	100 U	242	100 U	3,360	272 R	360	2,160	300	2,940	140	2,360	380
TPH-O (C24-C40) no/SG						469	100 U	839	100 U	663	100 U	106	100 U			-			94.3 UR	100 U	778	100 U
TPH-O (C24-C40) w/SG	442	100 U	374	94.3 U	100 U	112	100 U	95.7 U	100 U	146	100 U	98.8	100 U	333	93.9 UR	100 U	95.2 U	100 U	230	100 U	156	100 U

Well ID	M	W-A5				MW-A6				MW-A7	MW-A8
Date Sampled	12/5/2014	12/17/2014	6/19/2014		8/26/2014	9/30/2014	10/29/2014	11/20/2014	12/17/2014	8/27/2014	8/26/2014
Analytical Lab	TA EU	TA EU	TA ²	EU	TA EU	TA EU	TA EU	TA EU	TA EU	TA EU	TA EU
TPH-G (C6-C12)	100 U 100 U	100 U 100 U			100 U 100 U	100 U 100 U	100 U 100 U	100 U 100 U	100 U 100 U	100 UJ 100 U	100 U 100 U
TPH-D (C10-C24) no/SG	3,060 440	3,560 J 460	;	340		243 J 130	3,770 420	3,040 120	2,770 J 250		
TPH-D (C10-C24) w/SG	2,090 J 170	2,810 230	3,270 2,550	130	2,430 100 U	3,150 100 U	1,730 190	1,080 100 U	2470 110	94.3 U 100 U	93.9 U 100 U
TPH-O (C24-C40) no/SG	669 100 U	612 J 100 U				94.3 UR 100 U	561 100 U	468 100 U	383 J 100 U		
TPH-O (C24-C40) w/SG	184 J 100 U	274 100 U	272 230 1	00 U	174 100 U	159 100 U	94.8 U 100 U	100 U 100 U	168 100 U	94.3 U 100 U	93.9 U 100 U

TA = TestAmerica, Nashville, Tennessee

Well ID	MW-	11	MV	V-19					MW-	·40R				
Date Sampled	8/27/2	014	8/27	/2014	8/27/2	2014	9/30/2	014	10/29	/2014	11/19	/2014	12/17/	2014
Analytical Lab	TA	EU	TA	EU	TA	EU	TA	EU	TA	EU	TA	EU	TA	EU
TPH-G (C6-C12)	100 U	100 U	208	190	500 U	460	500 U	480	562	460	640	500	559	460
TPH-D (C10-C24) no/SG						-	2,080 J	1,000	1,290	1,200	1,290	750	2,040 J	770
TPH-D (C10-C24) w/SG	96.2 U	100 U	409	190	1,610 J	690	1,540 J	540	637	730	733 J	590	1610	550
TPH-O (C24-C40) no/SG							500 J	100 U	351	160	444	200	644 J	100
TPH-O (C24-C40) w/SG	96.2 U	100 U	94.3 U	100 U	276 J	97 J	165 J	100 U	95.2 U	100 U	115 J	94	345	100 U

Abbreviations:

-- = not analyzed

Notes:

1. Data qualifiers are as follows:

J = The result is an approximation.

U = not detected at or above the laboratory reporting limit shown.

UJ = not detected at or above value shown, which is the estimated reporting limit.

R = result is rejected due to surrogate non-compliance.

UR = Analyte was not detected at or above the reporting limit shown, but the result was rejected due to quality control issues.

2. The two results shown represent a primary and field duplicate sample.

TPH = total petroleum hydrocarbons EU = Eurofins Calscience, Garden Grove, California

TPG-D = total petroleum hydrocarbons diesel range

TPH-G = total petroleum hydrocarbons gasoline range

TPH-O = total petroleum hydrocarbons motor oil

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ANALYTICAL RESULTS FOR PAHs AND VOCs IN SPLIT GROUNDWATER SAMPLES¹
ExxonMobil/ADC Property, Ecology Site ID 2728
Everett, Washington



Well ID		MW-A1		1								MW-A2								
Date Sampled	6/19/2014	8/27/	2014	6/19/2014	1	8/27/	2014			9/30/	2014		1	10/29	/2014			11/20	/2014	
Analytical Lab	TA	TA	EU	TA	Т	A ²	E	IJ ²	T	4 ²	E	U ²	T/	A ²	E	U ²	Т	A^2	E	U ²
PAHs (μg/L)										•										
1-Methylnaphthalene	0.0948 U	1.06	0.51	0.0948 U	0.0943 U	0.0943 U	0.075 J	0.061 J	0.0966	0.1	0.084 J	0.095 U	0.508	0.533	1.6	2.1	0.259	0.267	0.28	0.27
2-Methylnaphthalene	0.0948 U	0.0952 U	0.096 U	0.0948 U	0.0943 U	0.0943 U	0.095 U	0.097 U	0.0952 U	0.0948 U	0.097 U	0.095 U	0.0948 U	0.0943 U	0.096 U	0.095 U	0.0943 U	0.0943 U	0.096 U	0.096 U
Acenaphthene	0.102	0.515	0.50	0.397	0.455	0.468	0.44	0.37	0.441	0.444	0.45	0.35	0.476	0.482	0.61	0.69	0.589	0.531	0.61	0.48
Acenaphthylene	0.0948 U	0.0952 U	0.096 U	0.0948 U	0.0943 U	0.0943 U	0.095 U	0.097 U	0.0952 U	0.0948 U	0.097 U	0.095 U	0.0948 U	0.0943 U	0.096 U	0.095 U	0.104	0.0943 U	0.11	0.099
Anthracene	0.0948 U	0.0952 U	0.096 U	0.0948 U	0.0943 U	0.0943 U	0.095 U	0.097 U	0.0952 U	0.0948 U	0.097 U	0.095 U	0.0948 U	0.0943 U	0.032	0.035	0.0943 U	0.0943 U	0.029	0.027
Benz[a]anthracene	0.0948 U	0.0952 U	0.096 U	0.0948 U	0.0943 U	0.0943 U	0.095 U	0.097 U	0.0952 U	0.0948 U	0.097 U	0.095 U	0.0948 U	0.0943 U	0.096 U	0.095 U	0.0943 U	0.0943 U	0.096 U	0.096 U
Benzo(a)pyrene	0.0948 U	0.0952 U	0.096 U	0.0948 U	0.0943 U	0.0943 U	0.095 U	0.097 U	0.0952 U	0.0948 U	0.097 U	0.095 U	0.0948 U	0.0943 U	0.096 U	0.095 U	0.0943 U	0.0943 U	0.096 U	0.096 U
Benzo(b)fluoranthene	0.0948 U	0.0952 U	0.096 U	0.0948 U	0.0943 U	0.0943 U	0.095 U	0.097 U	0.0952 U	0.0948 U	0.097 U	0.095 U	0.0948 U	0.0943 U	0.096 U	0.095 U	0.0943 U	0.0943 U	0.096 U	0.096 U
Benzo(g,h,i)perylene	0.0948 U	0.0952 U	0.096 U	0.0948 U	0.0943 U	0.0943 U	0.095 U	0.097 U	0.0952 U	0.0948 U	0.097 U	0.095 U	0.0948 U	0.0943 U	0.096 U	0.095 U	0.0943 U	0.0943 U	0.096 U	0.096 U
Benzo(k)fluoranthene	0.0948 U	0.0952 U	0.096 U	0.0948 U	0.0943 U	0.0943 U	0.095 U	0.097 U	0.0952 U	0.0948 U	0.097 U	0.095 U	0.0948 U	0.0943 U	0.096 U	0.095 U	0.0943 U	0.0943 U	0.096 U	0.096 U
Chrysene	0.0948 U	0.0952 U	0.096 U	0.0948 U	0.0943 U	0.0943 U	0.095 U	0.097 U	0.0952 U	0.0948 U	0.097 U	0.095 U	0.0948 U	0.0943 U	0.096 U	0.095 U	0.0943 U	0.0943 U	0.096 U	0.096 U
Dibenzo(a,h)anthracene	0.0948 U	0.0952 U	0.096 U	0.0948 U	0.0943 U	0.0943 U	0.095 U	0.097 U	0.0952 U	0.0948 U	0.097 U	0.095 U	0.0948 U	0.0943 U	0.096 U	0.095 U	0.0943 U	0.0943 U	0.096 U	0.096 U
Fluoranthene	0.0948 U	0.0952 U	0.096 U	0.0948 U	0.0943 U	0.0943 U	0.095 U	0.097 U	0.0952 U	0.0948 U	0.097 U	0.095 U	0.0948 U	0.0943 U	0.096 U	0.095 U	0.0943 U	0.0943 U	0.096 U	0.096 U
Fluorene	0.168	0.449	0.47	0.439	0.443	0.492	0.42	0.34	0.425	0.443	0.37	0.31	0.529	0.560	1.0	1.2	0.763	0.644	0.94	0.80
Indeno(1,2,3-cd)pyrene	0.0948 U	0.0952 U	0.096 U	0.0948 U	0.0943 U	0.0943 U	0.095 U	0.097 U	0.0952 U	0.0948 U	0.097 U	0.095 U	0.0948 U	0.0943 U	0.096 U	0.095 U	0.0943 U	0.0943 U	0.096 U	0.096 U
Naphthalene	0.0948 U	0.0952 U	0.096 U	0.135	0.219	0.238	0.095 U	0.097 U	0.191	0.197	0.097 U	0.095 U	0.136	0.162	0.096 U	0.095 U	0.164	0.183	0.21	0.20
Phenanthrene	0.0948 U	0.0952 U	0.096 U	0.0948 U	0.0943 U	0.0943 U	0.095 U	0.097 U	0.0952 U	0.0948 U	0.097 U	0.095 U	0.0948 U	0.0943 U	0.058	0.099	0.0943 U	0.0943 U	0.027	0.096 U
Pyrene	0.0948 U	0.0952 U	0.14	0.0948 U	0.0943 U	0.0943 U	0.095 U	0.097 U	0.0952 U	0.0948 U	0.097 U	0.095 U	0.0948 U	0.0943 U	0.022	0.022	0.0943 U	0.0943 U	0.096 U	0.096 U
VOCs (µg/L)																				
1,2-Dichloroethane	0.5 U			0.5 U																
Benzene	0.5 U	0.5 U	0.50 U	0.5 U	0.5 U	0.5 U	0.50 U	0.50 U	0.5 U	0.5 U	0.50 U	0.50 U	0.5 U	0.5 U	0.50 U	0.50 U	0.5 U	0.5 U	0.50 U	0.50 U
Ethylbenzene	0.5 U	0.5 U	1.0 U	0.5 U	0.5 U	0.5 U	1.0 U	1.0 U	0.5 U	0.5 U	1.0 U	1.0 U	0.5 U	0.5 U	1.0 U	1.0 U	0.5 U	0.5 U	1.0 U	1.0 U
Hexane	0.5 U			0.5 U																
Methyl t-butyl ether	0.5 U	0.5 U	1.0 U	0.5 U	0.5 U	0.5 U	1.0 U	1.0 U	0.5 U	0.5 U	1.0 U	1.0 U	0.5 U	0.5 U	1.0 U	1.0 U	0.5 U	0.5 U	1.0 U	1.0 U
Toluene	0.5 U	0.5 U	1.0 U	0.5 U	0.5 U	0.5 U	1.0 U	1.0 U	0.5 U	0.5 U	1.0 U	1.0 U	0.5 U	0.5 U	1.0 U	1.0 U	0.5 U	0.5 U	1.0 U	1.0 U
Total Xylenes	1.5 U	1.5 U	1.0 U	1.5 U	1.5 U	1.5 U	1.0 U	1.0 U	1.5 U	1.5 U	1.0 U	1.0 U	1.5 U	1.5 U	1.0 U	1.0 U	1.5 U	1.5 U	1.0 U	1.0 U
Ethylene dibromide	0.5 U			0.5 U																

ANALYTICAL RESULTS FOR PAHs AND VOCs IN SPLIT GROUNDWATER SAMPLES¹
ExxonMobil/ADC Property, Ecology Site ID 2728
Everett, Washington



Well ID		MW-A2	2 cont.		MW	-A3						MW-A4								MW-A5		
Date Sampled		12/18	/2014		8/26/	2014	6/19/2014	8/26/	2014	9/30/	2014	10/29	/2014	12/5/	2014	12/18	3/2014		6/19/2014		8/26/	2014
Analytical Lab	T.	A ²	Е	U²	TA	EU	TA	TA	EU	TA	EU	TA	EU	TA	EU	TA	EU	Т	A^2	EU	TA	EU
PAHs (μg/L)																						
1-Methylnaphthalene	0.315	0.314	0.28	0.40	0.0952 U	0.095 U	0.202	0.225	0.25	0.252	0.21	0.478	0.49	0.187	0.13	0.737	0.44	0.0948 U	0.0948 U	0.096 U	0.0952 U	0.043 J
2-Methylnaphthalene	0.0939 U	0.0943 U	0.035 J	0.043 J	0.0952 U	0.095 U	0.127	0.161	0.17	0.14	0.11	0.713	0.77	0.203	0.13	1.1	0.63	0.0948 U	0.0948 U	0.096 U	0.0952 U	0.036 J
Acenaphthene	0.51	0.493	0.42	0.35	0.697	0.93	1.92	2.18	2.5	2.71	2.6 J	3.2	3.6	2.51	1.9	3.34	2.0	2.55	2.71	0.034	2.5	4.3
Acenaphthylene	0.108	0.0943 U	0.071 J	0.067 J	0.0952 U	0.095 U	0.0948 U	0.0962 U	0.092 J	0.0962 U	0.028 J	0.0943 U	0.017 J	0.0952 U	0.018 J	0.0948 U	0.019 J	0.0948 U	0.0948 U		0.0952 U	0.13
Anthracene	0.0939 U	0.0943 U	0.018 J	0.020 J	0.0952 U	0.095 U	0.0948 U	0.0962 U	0.15	0.0962 U	0.074	0.112	0.11	0.0952 U	0.057 J	0.142	0.085 J	0.0948 U	0.0948 U		0.0952 U	0.10
Benz[a]anthracene	0.0939 U	0.0943 U	0.096 U	0.095 U	0.0952 U	0.095 U	0.0948 U	0.0962 U	0.027 J	0.0962 U	0.099 U	0.0943 U	0.096 U	0.0952 U	0.020 J	0.0948 U	0.095 U	0.0948 U	0.0948 U		0.0952 U	0.026 J
Benzo(a)pyrene	0.0939 U	0.0943 U	0.096 U	0.095 U	0.0952 U	0.095 U	0.0948 U	0.0962 U	0.096 U	0.0962 U	0.099 U	0.0943 U	0.096 U	0.0952 U	0.095 U	0.0948 U	0.095 U	0.0948 U	0.0948 U		0.0952 U	0.10 U
Benzo(b)fluoranthene	0.0939 U	0.0943 U	0.096 U	0.095 U	0.0952 U	0.095 U	0.0948 U	0.0962 U	0.096 U	0.0962 U	0.099 U	0.0943 U	0.096 U	0.0952 U	0.095 U	0.0948 U	0.095 U	0.0948 U	0.0948 U		0.0952 U	0.10 U
Benzo(g,h,i)perylene	0.0939 U	0.0943 U	0.096 U	0.095 U	0.0952 U	0.095 U	0.0948 U	0.0962 U	0.096 U	0.0962 U	0.099 U	0.0943 U	0.096 U	0.0952 U	0.095 U	0.0948 U	0.095 U	0.0948 U	0.0948 U		0.0952 U	0.10 U
Benzo(k)fluoranthene	0.0939 U	0.0943 U	0.096 U	0.095 U	0.0952 U	0.095 U	0.0948 U	0.0962 U	0.096 U	0.0962 U	0.099 U	0.0943 U	0.096 U	0.0952 U	0.095 U	0.0948 U	0.095 U	0.0948 U	0.0948 U		0.0952 U	0.10 U
Chrysene	0.0939 U	0.0943 U	0.096 U	0.095 U	0.0952 U	0.095 U	0.0948 U	0.0962 U	0.029 J	0.0962 U	0.099 U	0.0943 U	0.096 U	0.0952 U	0.010 J	0.0948 U	0.095 U	0.0948 U	0.0948 U		0.0952 U	0.034 J
Dibenzo(a,h)anthracene	0.0939 U	0.0943 U	0.096 U	0.095 U	0.0952 U	0.095 U	0.0948 U	0.0962 U	0.096 U	0.0962 U	0.099 U	0.0943 U	0.096 U	0.0952 U	0.095 U	0.0948 U	0.095 U	0.0948 U	0.0948 U		0.0952 U	0.10 U
Fluoranthene	0.0939 U	0.0943 U	0.096 U	0.095 U	0.0952 U	0.074 J	0.106	0.107	0.20	0.146	0.12	0.137	0.17	0.115	0.059 J	0.126	0.082 J	0.0948 U	0.0948 U		0.0952 U	0.080 J
Fluorene	0.72	0.71	0.60	0.59	0.514	0.60	0.612	0.676	0.86	0.865	0.81	1.16	1.3	0.864	0.64	1.38	0.89	0.0948 U	0.0948 U		0.0952 U	0.10
Indeno(1,2,3-cd)pyrene	0.0939 U	0.0943 U	0.096 U	0.095 U	0.0952 U	0.095 U	0.0948 U	0.0962 U	0.096 U	0.0962 U	0.099 U	0.0943 U	0.096 U	0.0952 U	0.095 U	0.0948 U	0.095 U	0.0948 U	0.0948 U		0.0952 U	0.10 U
Naphthalene	0.119	0.144	0.18	0.17	0.0952 U	0.095 U	1.11	1.25	1.2	0.846	0.68	4.35	3.3	1.8	1.2	7.22	3.5	0.0948 U	0.0948 U	0.034	0.0952 U	0.27
Phenanthrene	0.0939 U	0.0943 U	0.096 U	0.095 U	1.42	1.6	0.534	0.647	0.93	0.771	0.64	0.961	1.0	0.718	0.51	1.18	0.70	0.0948 U	0.0948 U		0.103	0.27
Pyrene	0.0939 U	0.0943 U	0.096 U	0.095 U	0.0952 U	0.067 J	0.0948 U	0.0962 U	0.17	0.0962 U	0.080 J	0.0943 U	0.11	0.0952 U	0.059 J	0.0948 U	0.048 J	0.0948 U	0.0948 U		0.0952 U	0.085 J
VOCs (µg/L)																						
1,2-Dichloroethane							0.5 U											0.5 U	0.5 U	0.50 U		
Benzene	0.5 U	0.5 U	0.50 U	0.50 U	0.5 U	0.50 U	0.5 U	0.5 U	0.50 U	0.5 UJ	0.50 U	0.5 U	0.50 U	0.5 U	0.50 U	0.5 U	0.16 J	0.5 U	0.5 U	0.50 U	0.5 U	0.50 U
Ethylbenzene	0.5 U	0.5 U	1.0 U	1.0 U	0.5 U	1.0 U	0.5 U	0.5 U	1.0 U	0.5 UJ	1.0 U	0.5 U	1.0 U	0.5 U	1.0 U	0.5 U	1.0 U	0.5 U	0.5 U	1.0 U	0.5 U	1.0 U
Hexane							0.5 U											0.5 U	0.5 U	1.0 U		
Methyl t-butyl ether	0.5 U	0.5 U	1.0 U	1.0 U	0.5 U	1.0 U	0.5 U	0.5 U	1.0 U	0.5 UJ	1.0 U	0.5 U	1.0 U	0.5 U	1.0 U	0.5 U	1.0 U	0.5 U	0.5 U	1.0 U	0.5 U	1.0 U
Toluene	0.5 U	0.5 U	1.0 U	1.0 U	0.5 U	1.0 U	0.5 U	0.5 U	1.0 U	0.5 UJ	1.0 U	0.5 U	1.0 U	0.5 U	1.0 U	0.5 U	1.0 U	0.5 U	0.5 U	1.0 U	0.5 U	1.0 U
Total Xylenes	1.5 U	1.5 U	1.0 U	1.0 U	1.5 U	1.0 U	0.5 U	1.5 U	1.0 U	1.5 UJ	1.0 U	1.5 U	1.0 U	1.5 U	1.0 U	1.5 U	1.0 U	0.5 U	0.5 U	1.0 U	1.5 U	1.0 U
Ethylene dibromide							1.5 U											1.5 U	1.5 U	1.0 U		

ANALYTICAL RESULTS FOR PAHs AND VOCs IN SPLIT GROUNDWATER SAMPLES¹
ExxonMobil/ADC Property, Ecology Site ID 2728
Everett, Washington



	T			NAVA/ A	F t										NAVA A C						
Well ID					5 cont.							1		1	MW-A6						
Date Sampled	9/30/		10/29		12/5/	2014	12/17	/2014		6/19/2014		8/26/		9/30/	2014	10/29	/2014	11/20		12/17	
Analytical Lab	TA	EU	TA	EU	TA	EU	TA	EU	T.	A ²	EU	TA	EU	TA	EU	TA	EU	TA	EU	TA	EU
PAHs (μg/L)																					
1-Methylnaphthalene	0.0943 U	0.16	0.0943 U	0.095 U	0.0943 U	0.019 J	0.0943 U	0.096 U	0.0948 U	0.0948 U	0.097 U	0.0952 U	0.095 U	0.0952 U	0.28	0.0948 U	0.097 U	0.0943 U	0.095 U	0.0943 U	0.095 U
2-Methylnaphthalene	0.0943 U	0.096 U	0.0943 U	0.095 U	0.0943 U	0.017 J	0.0943 U	0.014 J	0.0948 U	0.0948 U	0.097 U	0.0952 U	0.095 U	0.0952 U	0.095 U	0.0948 U	0.097 U	0.0943 U	0.095 U	0.0943 U	0.095 U
Acenaphthene	2.49	3.4	2.38	1.1	2.28	1.4	2.06	1.9	0.266	0.177	0.097 U	0.23	0.41	0.619	0.63	0.323	0.25	0.314	0.27	0.287	0.10
Acenaphthylene	0.0943 U	0.096 U	0.0943 U	0.011 J	0.0943 U	0.015 J	0.0943 U	0.025 J	0.0948 U	0.0948 U		0.0952 U	0.020 J	0.0952 U	0.095 U	0.0948 U	0.097 U	0.0943 U	0.095 U	0.0943 U	0.095 U
Anthracene	0.0943 U	0.096 U	0.0943 U	0.095 U	0.0943 U	0.032 J	0.0943 U	0.017 J	0.0948 U	0.0948 U		0.0952 U	0.023 J	0.0952 U	0.095 U	0.0948 U	0.097 U	0.0943 U	0.023 J	0.0943 U	0.095 U
Benz[a]anthracene	0.0943 U	0.096 U	0.0943 U	0.095 U	0.0943 U	0.096 U	0.0943 U	0.096 U	0.0948 U	0.0948 U		0.0952 U	0.095 U	0.0952 U	0.095 U	0.0948 U	0.097 U	0.0943 U	0.095 U	0.0943 U	0.095 U
Benzo(a)pyrene	0.0943 U	0.096 U	0.0943 U	0.095 U	0.0943 U	0.096 U	0.0943 U	0.096 U	0.0948 U	0.0948 U		0.0952 U	0.095 U	0.0952 U	0.095 U	0.0948 U	0.097 U	0.0943 U	0.095 U	0.0943 U	0.095 U
Benzo(b)fluoranthene	0.0943 U	0.096 U	0.0943 U	0.095 U	0.0943 U	0.096 U	0.0943 U	0.096 U	0.0948 U	0.0948 U		0.0952 U	0.095 U	0.0952 U	0.095 U	0.0948 U	0.097 U	0.0943 U	0.095 U	0.0943 U	0.095 U
Benzo(g,h,i)perylene	0.0943 U	0.096 U	0.0943 U	0.095 U	0.0943 U	0.096 U	0.0943 U	0.096 U	0.0948 U	0.0948 U		0.0952 U	0.095 U	0.0952 U	0.095 U	0.0948 U	0.097 U	0.0943 U	0.095 U	0.0943 U	0.095 U
Benzo(k)fluoranthene	0.0943 U	0.096 U	0.0943 U	0.095 U	0.0943 U	0.096 U	0.0943 U	0.096 U	0.0948 U	0.0948 U		0.0952 U	0.095 U	0.0952 U	0.095 U	0.0948 U	0.097 U	0.0943 U	0.095 U	0.0943 U	0.095 U
Chrysene	0.0943 U	0.096 U	0.0943 U	0.095 U	0.0943 U	0.096 U	0.0943 U	0.096 U	0.0948 U	0.0948 U		0.0952 U	0.095 U	0.0952 U	0.095 U	0.0948 U	0.097 U	0.0943 U	0.095 U	0.0943 U	0.095 U
Dibenzo(a,h)anthracene	0.0943 U	0.096 U	0.0943 U	0.095 U	0.0943 U	0.096 U	0.0943 U	0.096 U	0.0948 U	0.0948 U		0.0952 U	0.095 U	0.0952 U	0.095 U	0.0948 U	0.097 U	0.0943 U	0.095 U	0.0943 U	0.095 U
Fluoranthene	0.0943 U	0.096 U	0.0943 U	0.095 U	0.0943 U	0.013 J	0.0943 U	0.096 U	0.0948 U	0.0948 U		0.0952 U	0.066 J	0.0952 U	0.069 J	0.0948 U	0.097 U	0.0943 U	0.095 U	0.0943 U	0.023 J
Fluorene	0.0943 U	0.096 U	0.0943 U	0.095 U	0.0943 U	0.027 J	0.0943 U	0.085 J	0.0948 U	0.0948 U		0.0952 U	0.087 J	0.127	0.13 J	0.0948 U	0.097 U	0.0943 U	0.045 J	0.0943 U	0.019 J
Indeno(1,2,3-cd)pyrene	0.0943 U	0.096 U	0.0943 U	0.095 U	0.0943 U	0.096 U	0.0943 U	0.096 U	0.0948 U	0.0948 U		0.0952 U	0.095 U	0.0952 U	0.095 U	0.0948 U	0.097 U	0.0943 U	0.095 U	0.0943 U	0.095 U
Naphthalene	0.0943 U	0.096 U	0.0943 U	0.095 U	0.0943 U	0.013 J	0.0943 U	0.043 J	0.0948 U	0.0948 U	0.097 U	0.0952 U	0.11	0.0952 U	0.095 U	0.0948 U	0.097 U	0.0943 U	0.095 U	0.0943 U	0.022 J
Phenanthrene	0.0943 U	0.096 U	0.0943 U	0.016 J	0.0943 U	0.022 J	0.0943 U	0.024 J	0.0948 U	0.0948 U		0.0952 U	0.023 J	0.0952 U	0.095 U	0.0948 U	0.097 U	0.0943 U	0.095 U	0.0943 U	0.095 U
Pyrene	0.0943 U	0.025 J	0.0943 U	0.013 J	0.0943 U	0.013 J	0.0943 U	0.056 J	0.0948 U	0.0948 U		0.0952 U	0.056 J	0.0952 U	0.059 J	0.0948 U	0.045 J	0.0943 U	0.039 J	0.0943 U	0.022 J
VOCs (µg/L)																					
1,2-Dichloroethane			-						0.5 U	0.5 U	0.50 U										
Benzene	0.5 U	0.17 J	0.5 U	0.19 J	0.5 U	0.18 J	0.5 U	0.22 J	0.5 U	0.5 U	0.50 U	0.5 U	0.50 U	0.5 U	0.50 U	0.5 U	0.50 U	0.5 U	0.50 U	0.5 U	0.50 U
Ethylbenzene	0.5 U	1.0 U	0.5 U	1.0 U	0.5 U	1.0 U	0.5 U	1.0 U	0.5 U	0.5 U	1.0 U	0.5 U	1.0 U	0.5 U	1.0 U	0.5 U	1.0 U	0.5 U	1.0 U	0.5 U	1.0 U
Hexane									0.5 U	0.5 U	1.0 U										
Methyl t-butyl ether	0.5 U	0.50 U	0.5 U	0.50 U	0.5 U	1.0 U	0.5 U	1.0 U	0.5 U	0.5 U	1.0 U	0.5 U	1.0 U	0.5 U	1.0 U	0.5 U	1.0 U	0.5 U	1.0 U	0.5 U	1.0 U
Toluene	0.5 U	1.0 U	0.5 U	1.0 U	0.5 U	1.0 U	0.5 U	1.0 U	0.5 U	0.5 U	1.0 U	0.5 U	1.0 U	0.5 U	1.0 U	0.5 U	1.0 U	0.5 U	1.0 U	0.5 U	1.0 U
Total Xylenes	1.5 U	1.0 U	1.5 U	1.0 U	1.5 U	1.0 U	1.5 U	1.0 U	0.5 U	0.5 U	1.0 U	1.5 U	1.0 U	1.5 U	1.0 U	1.5 U	1.0 U	1.5 U	1.0 U	1.5 U	1.0 U
Ethylene dibromide									1.5 U	1.5 U	1.0 U										

ANALYTICAL RESULTS FOR PAHS AND VOCs IN SPLIT GROUNDWATER SAMPLES¹

ExxonMobil/ADC Property, Ecology Site ID 2728 Everett, Washington



Well ID	MW	I-A7	MW	-A8	MW	-11	MW	<i>I</i> -19					MW-4	0R				
Date Sampled	8/27/	2014	8/26/	2014	8/27/	2014	8/27/	2014	8/27/	2014	9/30/	2014	10/29	/2014	11/19	/2014	12/17	/2014
Analytical Lab	TA	EU	TA	EU	TA	EU	TA	EU	TA	EU	TA	EU	TA	EU	TA	EU	TA	EU
PAHs (μg/L)																		
1-Methylnaphthalene	0.0952 U	0.10 U	0.0962 U	0.095 U	0.0952 U	0.097 U	0.122	0.11	12.3	11	11.3	8.7	15.8	3.7	18.2	3.7	13.6	8.9
2-Methylnaphthalene	0.0952 U	0.10 U	0.0962 U	0.095 U	0.0952 U	0.097 U	0.0952 U	0.099 U	1.47	1.3	0.899	0.62	0.826	0.18	1.15	0.43	0.756	0.48
Acenaphthene	0.0952 U	0.10 U	0.0962 U	0.095 U	0.0952 U	0.097 U	0.164	0.12	0.877	0.72	0.87	0.55	0.903	0.48	1.01	0.45	0.838	0.61
Acenaphthylene	0.0952 U	0.10 U	0.0962 U	0.019 J	0.0952 U	0.097 U	0.0952 U	0.099 U	0.115	0.096 U	0.190 U	0.095 U	0.106	0.099 U	0.121	0.064 J	0.0947	0.079 J
Anthracene	0.0952 U	0.10 U	0.0962 U	0.095 U	0.0952 U	0.097 U	0.0952 U	0.099 U	0.110	0.096 U	0.190 U	0.095 U	0.0943 U	0.040 J	0.0943 U	0.040 J	0.0939 U	0.055 J
Benz[a]anthracene	0.0952 UJ	0.10 U	0.0962 U	0.095 U	0.0952 U	0.097 U	0.0952 U	0.099 U	0.0962 U	0.096 U	0.190 U	0.095 U	0.0943 U	0.099 U	0.0943 U	0.096 U	0.0939 U	0.096 U
Benzo(a)pyrene	0.0952 UJ	0.10 U	0.0962 U	0.095 U	0.0952 U	0.097 U	0.0952 U	0.099 U	0.0962 U	0.096 U	0.190 U	0.095 U	0.0943 U	0.099 U	0.0943 U	0.096 U	0.0939 U	0.096 U
Benzo(b)fluoranthene	0.0952 UJ	0.10 U	0.0962 U	0.095 U	0.0952 U	0.097 U	0.0952 U	0.099 U	0.0962 U	0.096 U	0.190 U	0.095 U	0.0943 U	0.099 U	0.0943 U	0.096 U	0.0939 U	0.096 U
Benzo(g,h,i)perylene	0.0952 UR	0.10 U	0.0962 U	0.095 U	0.0952 U	0.097 U	0.0952 U	0.099 U	0.0962 U	0.096 U	0.190 U	0.095 U	0.0943 U	0.099 U	0.0943 U	0.096 U	0.0939 U	0.096 U
Benzo(k)fluoranthene	0.0952 UJ	0.10 U	0.0962 U	0.095 U	0.0952 U	0.097 U	0.0952 U	0.099 U	0.0962 U	0.096 U	0.190 U	0.095 U	0.0943 U	0.099 U	0.0943 U	0.096 U	0.0939 U	0.096 U
Chrysene	0.0952 UJ	0.10 U	0.0962 U	0.095 U	0.0952 U	0.097 U	0.0952 U	0.099 U	0.0962 U	0.045 J	0.190 U	0.095 U	0.0943 U	0.099 U	0.0943 U	0.013 J	0.0939 U	0.019 J
Dibenzo(a,h)anthracene	0.0952 U	0.10 U	0.0962 U	0.095 U	0.0952 U	0.097 U	0.0952 U	0.099 U	0.0962 U	0.096 U	0.190 U	0.095 U	0.0943 U	0.099 U	0.0943 U	0.096 U	0.0939 U	0.096 U
Fluoranthene	0.0952 UR	0.10 U	0.0962 U	0.095 U	0.0952 U	0.097 U	0.0952 U	0.099 U	0.0962 U	0.076 J	0.190 U	0.039 J	0.0943 U	0.039 J	0.0943 U	0.030 J	0.0939 U	0.041 J
Fluorene	0.0952 U	0.10 U	0.0962 U	0.095 U	0.0952 U	0.097 U	0.0952 U	0.050 J	0.815	0.74	0.799	0.52	0.855	0.43	0.88	0.47	0.77	0.62
Indeno(1,2,3-cd)pyrene	0.0952 UR	0.10 U	0.0962 U	0.095 U	0.0952 U	0.097 U	0.0952 U	0.099 U	0.0962 U	0.096 U	0.190 U	0.095 U	0.0943 U	0.099 U	0.0943 U	0.096 U	0.0939 U	0.096 U
Naphthalene	0.0952 U	0.10 U	0.0962 U	0.081 J	0.0952 U	0.012 J	0.306	0.099 U	0.817	0.096 U	0.370	0.095 U	0.272	0.099 U	0.41	0.31	0.327	0.43
Phenanthrene	0.0952 U	0.10 U	0.0962 U	0.020 J	0.0952 U	0.097 U	0.0952 U	0.099 U	0.604	0.42	0.524	0.29	0.457	0.10	0.595	0.25	0.458	0.28
Pyrene	0.0952 U	0.10 U	0.0962 U	0.095 U	0.0952 U	0.097 U	0.0952 U	0.099 U	0.151	0.10	0.190 U	0.071 J	0.0943 U	0.064 J	0.116	0.047 J	0.0939 U	0.059 J
VOCs (μg/L)																		
1,2-Dichloroethane																		
Benzene	0.5 U	0.50 U	0.5 U	0.50 U	0.5 U	0.50 U	0.5 U	0.50 U	0.5 U	1.7	1.67	2.1	0.5 U	0.96	0.592	0.61	0.576	0.58
Ethylbenzene	0.5 U	1.0 U	0.5 U	1.0 U	0.5 U	1.0 U	0.5 U	1.0 U	0.5 U	0.30 J	0.5 U	0.33	0.5 U	0.17 J	0.5 U	0.15 J	0.5 U	1.0 U
Hexane	-																-	
Methyl t-butyl ether	0.5 U	1.0 U	0.5 U	1.0 U	0.5 U	1.0 U	0.5 U	1.0 U	0.5 U	1.0 U	0.5 U	1.0 U	0.5 U	1.0 U	0.5 U	1.0 U	0.5 U	1.0 U
Toluene	0.5 U	1.0 U	0.5 U	1.0 U	0.5 U	1.0 U	0.5 U	1.0 U	0.5 U	0.50 J	0.5 U	0.44	0.5 U	0.39	0.5 U	0.30 J	0.5 U	1.0 U
Total Xylenes	1.5 U	1.0 U	1.5 U	1.0 U	1.5 U	1.0 U	1.5 U	1.0 U	1.5 U	2.6 J	2.78	2.4	1.5 U	2.1	1.96	1.5 J	1.77	1.5 J
Ethylene dibromide																		

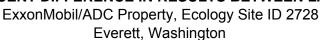
Notes:

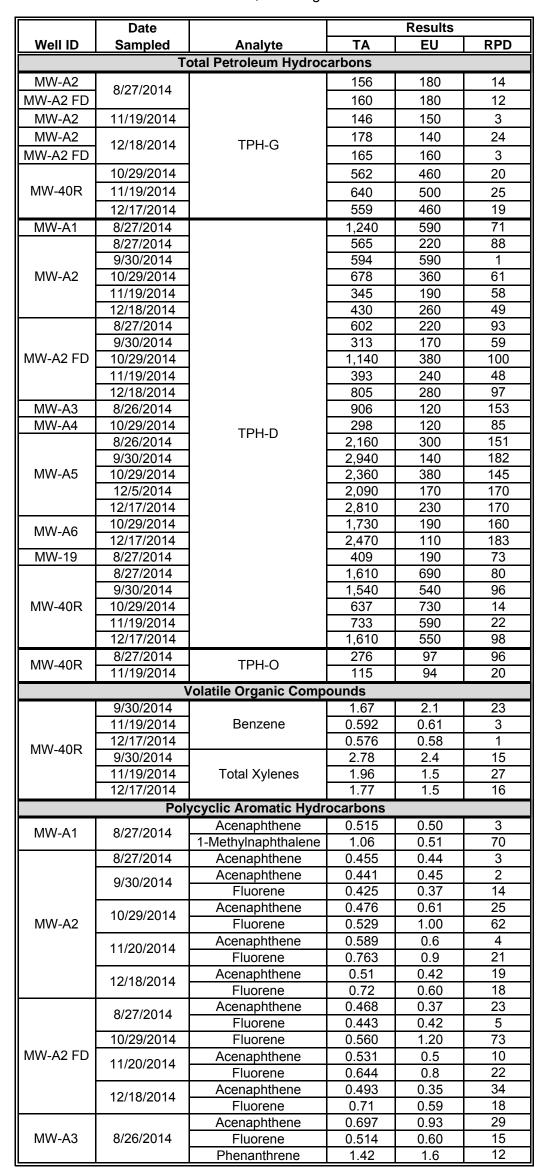
- 1. Data qualifiers are as follows:
- J = The result is an approximation.
- U = not detected at or above the laboratory reporting limit shown.
- UJ = not detected at or above value shown, which is the estimated reporting limit.
- 2. The two results shown represent a primary and field duplicate sample.

Abbreviations:

--- = not analyzed
μg/L = micrograms per liter
EU = Eurofins Calscience, Garden Grove, California
PAHs = polycyclic aromatic hydrocarbons
TA = TestAmerica, Nashville, Tennessee
VOCs = volatile organic compounds

RELATIVE PERCENT DIFFERENCE IN RESULTS BETWEEN LABORATORIES¹

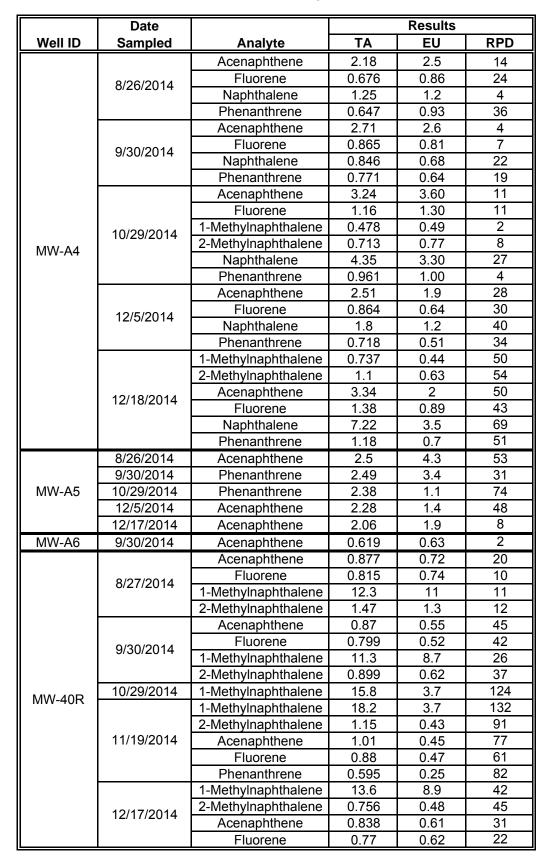






RELATIVE PERCENT DIFFERENCE IN RESULTS BETWEEN LABORATORIES¹

ExxonMobil/ADC Property, Ecology Site ID 2728 Everett, Washington



<u>Notes</u>

1. Results reported in micrograms per liter.

Abbreviations

EU = Eurofins Calscience, Garden Grove, California

FD = field duplicate

RPD = relative percent difference

TA = TestAmerica, Nashville, Tennessee

TPH-D = total petroeum hydrocarbons diesel

TPH-G = total petroleum hydrocarbons gasoline TPH-O = total petroleum hydrocarbons oil







SUMMARY STATISTICS FOR RELATIVE PERCENT DIFFERENCE IN RESULTS BETWEEN LABORATORIES

ExxonMobil/ADC Property, Ecology Site ID 2728 Everett, Washington

	Number of	Relative Percent Difference				
Analyte	Measurements	Minimum Maximum Ave				
TPH-G	8	3	25	15		
TPH-D	26	1	183	96		
TPH-O	2	20	96	58		
VOCs	6	1	27	14		
PAHs	69	2	132	33		

Abbreviations:

PAHs = polycyclic aromatic hydrocarbons

TPH-D = total petroleum hydrocarbons in the diesel range

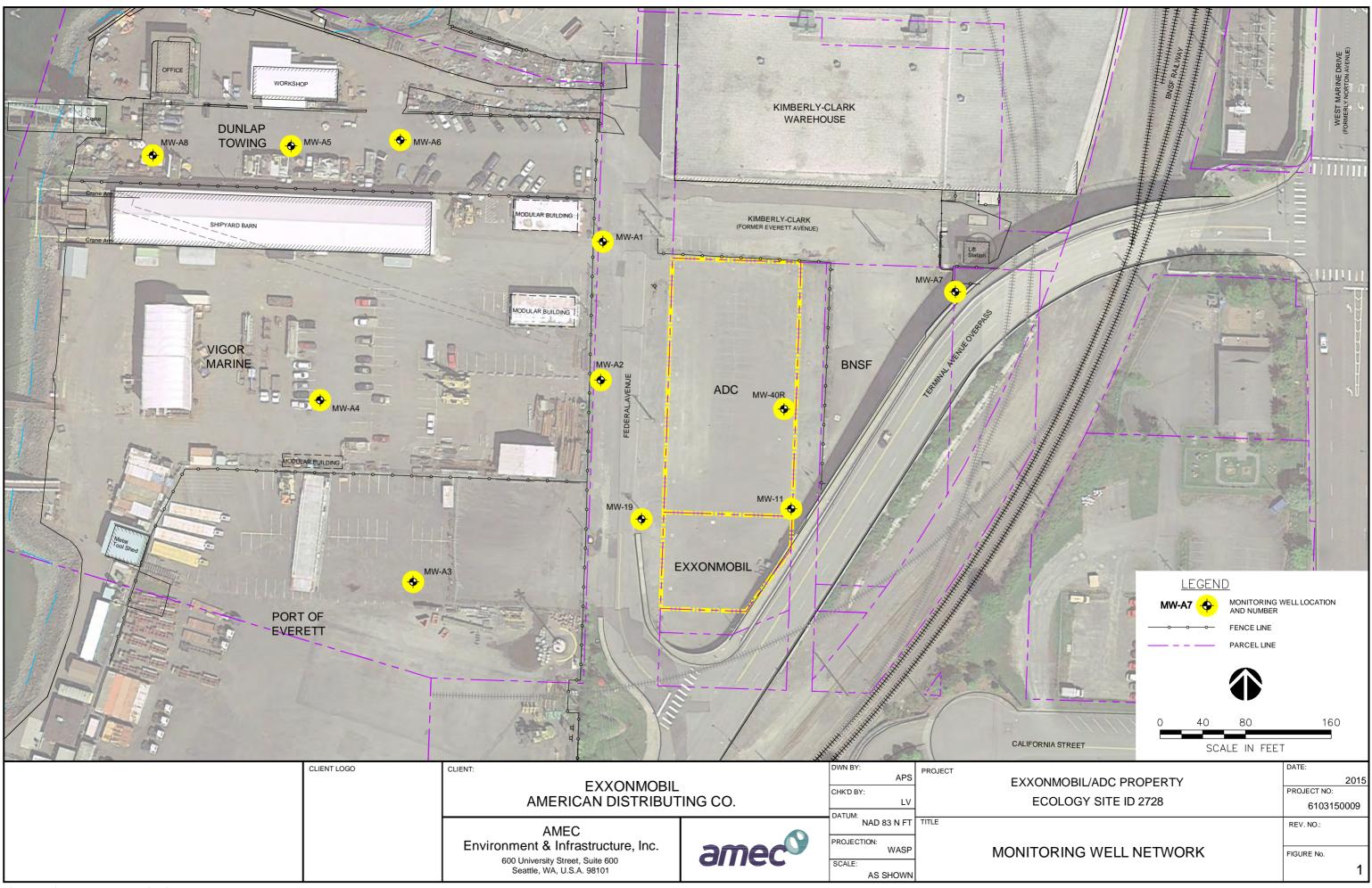
TPH-G = total petroleum hydrocarbons in the gasoline range

TPH-O = total petroleum hydrocarbons in the oil range

VOCs = volatile organic compounds



FIGURES





ATTACHMENT A

Friedman & Bruya Assessment

ENVIRONMENTAL CHEMISTS

James E. Bruya, Ph.D. Yelena Aravkina, M.S. Michael Erdahl, B.S. Arina Podnozova, B.S. Eric Young, B.S. 3012 16th Avenue West Seattle, WA 98119-2029 (206) 285-8282 fbi@isomedia.com www.friedmanandbruya.com

November 18, 2014

Leah Vigoren, Project Manager AMEC Environment & Infrastructure, Inc. One Union Square 600 University Street, Suite 600 Seattle, WA 98101

Dear Ms. Vigoren:

As requested, we have reviewed the documents provided by AMEC Environment & Infrastructure, Inc. regarding the 2717 and 2713 Federal Avenue, Everett, WA project. These documents included analytical data generated from the testing of water samples for total petroleum hydrocarbons (TPH) as diesel and motor oil, extractable petroleum hydrocarbons (EPH) and volatile petroleum hydrocarbons (VPH) by TestAmerica (TA) Nashville and Eurofins in June, August, and September 2014. In addition, we have reviewed the standard operating procedures (SOPs) for TPH, EPH, VPH, silica gel, and aqueous sample extractions provided by the laboratories.

It is our understanding that TA Nashville has been used exclusively for the analysis of groundwater samples from the 2717 and 2713 Federal Avenue, Everett, WA site for several years. During this time period, TA Nashville reported TPH results for two wells in the range of 2,500-3,000 ug/L. In May 2014, TA Nashville analyzed a sample from one of the wells for EPH/VPH and reported that EPH was non-detect. TA Nashville could provide no explanation for the difference between the high level of TPH reported and the non-detect EPH result. To elucidate this issue, a monthly sampling program was initiated in which split samples were submitted to TA Nashville and to the other contract laboratory available to analyze site samples (Eurofins). In June 2014, both laboratories were requested to analyze split samples for TPH and EPH/VPH. In August, both laboratories were requested to analyze samples for TPH with silica gel cleanup, and in September, TPH with and without silica gel cleanup. Review of the data generated shows that the TPH results reported by the two laboratories differ substantially, with Eurofins' results significantly lower than TA's.

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The purpose of this evaluation is to understand the reason for the differences between the results reported by the two laboratories and to evaluate which laboratory provided more representative results of the actual site conditions. Review of the documents provided included, but was not limited to, evaluation of raw analytical data, laboratory bench sheets, chromatograms, quality assurance data, laboratory calculations, and laboratory extraction and analytical procedures. Information regarding the sample matrices, such as the sample pH and presence or absence of sediment or sheen in the samples, was also evaluated. Our findings are provided below.

• **Comparison of TPH Results:** Review of the documents provided shows that discrepancies exist between the TPH results generated by TA Nashville and Eurofins. For example, a summary of the results of the TPH as diesel (TPH-D) analysis without silica gel for the samples MW-A5 and MW-A6 is provided as Table 1. A summary of the results of the TPH-D analysis with silica gel for the samples MW-A5 and MW-A6 is provided as Table 2.

Table 1. TPH-D Without Silica Gel for MW-A5 and MW-A6 (Results reported in ppb)

Laboratory	TA Nashville			Eurofins		
Sampling Event Date	June 2014	Aug 2014	Sept 2014	June 2014	Aug 2014	Sept 2014
MW-A5	no data	no data	155 a	590	no data	310
MW-A6	no data	no data	243 a	340	no data	130

a - The surrogate recovery was outside of control limits (4-6%) indicating poor extraction efficiency.

Table 2. TPH-D With Silica Gel for MW-A5 and MW-A6 (Results reported in ppb)

Laboratory	TA Nashville			TA Nashville Eurofins		
Sampling Event Date	June 2014	Aug 2014	Sept 2014	June 2014	Aug 2014	Sept 2014
MW-A5 w/ sg	3360	2160	2940	360	300	140
MW-A6 w/ sg	3270	2430	3150	130	<100	<100

Review of Table 1 shows that no data were available and/or the data were unreliable from TA Nashville regarding the level of TPH-D before silica gel in the samples MW-A5 and MW-A6. For the only sampling event for which data are available (Sept 2014), the levels of TPH-D reported are similar between the 2 laboratories. However, the low recovery of the surrogate for the results from TA Nashville indicate that much higher results may be present. Adjusting the TA Nashville results for the low surrogate recovery by multiplying the reported values by approximately 20, yield results that are considerably different (greater than 10 fold) than those reported by Eurofins.

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Review of Table 2 shows that considerable differences (approximately 10 fold) exist between TA Nashville and Eurofins. In addition, the TA Nashville results in Table 2 can be used to predict the June and August 2014 TA Nashville results. The action of silica gel is to remove polar material from sample extracts. This means that the TPH-D results will always be higher than the TPH-D silica gel results. Since the use of silica gel should remove non-hydrocarbon material from the samples, the TA Nashville TPH data for Table 1 should all exceed 2,000 ppb based on the results shown in Table 2.

Comparison of the data generated shows that the TPH-D results reported by Eurofins before silica gel are much lower than those those expected from TA Nashville. The discrepancy in these results may be due to sample inhomogeneity and/or anomalies in Eurofins' extraction procedure that were not readily identified.¹

Review of Table 2 shows that TA Nashville's TPH-D after silica gel results were much higher than Eurofins' results. TA Nashville reported greater than 2,000 ppb TPH-D after silica gel, while Eurofins reported less than 400 ppb in the samples MW-A5 and MW-6. These differences may be due to the practice followed by each laboratory when treating each sample with silica gel.

Silica gel cleanup is used to remove interfering non-hydrocarbon or polar material from hydrocarbon material in sample extracts prior to analysis. This cleanup is typically performed using one of two methods: the "Shake" method or the "Column" method. The "Shake" method involves adding a small amount (typically less than 1 gram) of silica gel to the sample extract and shaking the vial to remove polar compounds. The "Column" method involves passing the sample extract through a glass column filled with approximately 3-10 grams of silica gel to remove polar compounds. The "Shake" method of silica gel cleanup has been shown to be less effective in separating polar compounds from hydrocarbons in TPH analysis compared to the "Column" method.² In addition,

¹ Solvent, solvent extraction time, temperature of the sample, and the addition of solvent to the sample container can all have an impact on sample results and are virtually impossible to assess after analyses are conducted. ² Zemo, D.A., Synowiec, K.A., Magaw, R.I. and Mohler, R.E. (2013), Comparison of Shake and Column Silica Gel Cleanup Methods for Groundwater Extracts to Be Analyzed for TPHd/DRO. Groundwater Monitoring & Remediation, 33: 108-112. doi: 10.1111/gwmr.12032. http://www.onlinelibrary.wiley.com/doi/10.1111/gwmr.12032/pdf

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EPA method 3630 references the "Column" method, not the "Shake" method, for silica gel cleanup of sample extracts. $^{\rm 3}$

Comparison of the SOPs provided shows that TA Nashville and Eurofins perform their TPH-D silica gel cleanup procedures using the "Shake" method. The differences seen in the reported TPH-D results after silica gel between TA and Eurofins is likely due at least in part to the laboratories' use of the "Shake" method of silica gel cleanup, which may or may not be adequate to effect the removal of the majority of polar compounds present in the samples.

• **Comparison of TPH and EPH Results:** Review of the documents shows that discrepancies exist between the TPH silica gel results and EPH results generated by TA Nashville and Eurofins. A summary of these results for the samples MW-A5 and MW-A6 is provided as Table 3. For comparison, the aliphatic and aromatic fractions of the EPH analysis have been totaled to show a total EPH value.

Table 3. TPH-D w/SG and Total EPH for MW-A5 and MW-A6 (Results reported in ppb)

Analysis	TPH-D wit	TPH-D with Silica Gel		EPH
Laboratory	TA Nashville Eurofins		TA Nashville	Eurofins
Sampling Event Date	June 2014	June 2014	June 2014	June 2014
MW-A5	3360	360	<340	18.8
MW-A6	3270	130	<340	< 50

Review of Table 3 shows that TA Nashville identified greater than 3,000 ppb TPH-D after silica gel in the samples MW-A5 and MW-A6, while Eurofins identified less than 400 ppb. The results of the EPH analysis for these samples were reported as non-detect or nearly non-detect by both TA Nashville and Eurofins.

Both the TPH-D with silica gel analysis and the EPH analysis use silica gel to remove non-hydrocarbon or polar material from hydrocarbon material in sample extracts. If the silica gel cleanup proved effective in both cases, the TPH-D and EPH results should be similar. However, review of the results generated shows that the TPH-D with silica gel results were much higher than the EPH results for both laboratories. The level of material remaining after the TPH-D silica gel cleanup indicates that the "Shake" method of cleanup used by TA Nashville and

³ US Environmental Protection Agency. *Method 3630C: Silica Gel Cleanup, Rev. 3.* December 1996. USEPA. http://www.epa.gov/osw/hazard/testmethods/sw846/pdfs/3630c.pdf.

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Eurofins was inadequate at removing polar compounds present in the samples. In addition, the reduction in the level of material after EPH analysis compared to the TPH analysis is an indication that the vast majority of the material present in the samples MW-A5 and MW-A6 is polar in nature.

Furthermore, review of each laboratory's SOP shows that the EPH analysis was performed by passing the sample extracts through a large glass column filled with approximately 6 or 10 grams of silica gel. This procedure is similar to the TPH-D silica gel "Column" method described above. The reduction in the level of material after EPH analysis compared to the TPH analysis is an indication that the "Column" method of silica gel cleanup is more effective at removing polar compounds in sample extracts than the laboratories' "Shake" method.

Finally, it should be noted that comparison of the data generated shows that Eurofins' TPH-D results after silica gel (130-360 ppb) are more similar to the non-detect or nearly non-detect EPH results than TA Nashville's results (greater than 3,000 ppb).

In conclusion, the discrepancies seen between TA Nashville and Eurofins' TPH results before silica gel may be due to sample inhomogeneity and/or anomalies in Eurofins' extraction procedure that were not readily identified. Review of the data provided shows that many of the samples at the site contain a significant level of polar compounds that interfere with the analysis of TPH. Silica gel treatment of the sample extracts is appropriate to remove the polar compounds present in these samples prior to TPH analysis. The discrepancies seen between TA Nashville and Eurofins' TPH results after silica gel and their EPH results are likely due at least in part to the laboratories' use of the "Shake" method of silica gel cleanup. Based on the data generated, the "Column" method of silica gel cleanup provides more effective removal of the interfering polar compounds than the laboratories' "Shake" methods. Finally, it should be noted that comparison of the data generated shows that Eurofins' TPH-D results after silica gel are more similar to the non-detect or nearly non-detect EPH results than TA Nashville's results.

Further testing of water samples at the site using the "Column" method of silica gel cleanup is recommended, if warranted. In addition, TPH analysis of the samples both with and without silica gel, as well as TPH analysis of a matrix spike with and without silica gel, may be useful in further characterizing the material present at this site. Finally, use of a secondary polar reverse surrogate in the TPH extraction may

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also be useful in monitoring the efficiency of the laboratory's silica gel cleanup procedures.

We appreciate this opportunity to be of service to you and hope you will call if you should have any questions.

Sincerely,

FRIEDMAN & BRUYA, INC.

(mulle Postal Poquiz

Michele Costales Poquiz

Chemist

Enclosures

c: leah.vigoren@amec.com, larry.mcgaughey@amec.com GMX1118R.DOC



ATTACHMENT B

Laboratory Data Reports (to be provided separately) and Data Validation Memoranda



Memo

To: Leah Vigoren Project: 6103140009
From: Crystal Neirby cc: Project File

Tel: (206) 342-1760 Fax: (206) 342-1761 Date: January 21, 2015

Subject: ExxonMobil/ADC Site – June 2014 Split Groundwater Sampling

Data Quality Review – TestAmerica SDG 490-55979-1

This memorandum presents a summary data quality review for analyses of five primary ground water samples, two groundwater field blanks, and one trip blank collected on June 19, 2014. The samples were submitted to TestAmerica Laboratories, Inc., located in Nashville, Tennessee, a laboratory certified by the Washington State Department of Ecology (Ecology). The samples were analyzed for the following analytes:

- Volatile organic compounds (VOCs) by EPA Method 8260B (only benzene, toluene, ethylbenzene, total xylenes, methyl tert-butyl ether, 1,2-dibromoethane, 1.2-dichloroethane, and hexane were reported);
- Polycyclic aromatic hydrocarbons (PAHs) by EPA Method 8270D with select ion monitoring (SIM);
- Total petroleum hydrocarbons (TPH) as diesel (TPH-D) (reported as C10-C24) and motor oil (reported as C24-C40) by NWTPH-Dx with silica gel cleanup;
- Extractable petroleum hydrocarbons (EPH) by Ecology Method NWTPH-EPH; and
- Volatile petroleum hydrocarbons (VPH) by Ecology Method NWTPH-VPH.

The sample IDs, sample collection dates, laboratory sample IDs, and analyses conducted on the samples are listed in the table below.

Sample ID	Well ID	Sample	Laboratory	Requested Analyses
		Collection Date	Sample ID	
XOM061914-01	MW-A4	6/19/2014	490-55979-1	all
XOM061914-02	MW-A5	6/19/2014	490-55979-2	all
XOM061914-06	MW-A5	6/19/2014	490-55979-3	all
	field duplicate			
XOM061914-03	MW-A6	6/19/2014	490-55979-4	all
XOM061914-07	MW-A6	6/19/2014	490-55979-5	all
	field duplicate			
XOM061914-04	MW-A1	6/19/2014	490-55979-6	all
XOM061914-05	MW-A2	6/19/2014	490-55979-7	all
Trip Blank-01	Trip Blank	6/19/2014	490-55979-8	VOCs

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Upon receipt by the laboratory, information from the sample jars was compared to the chain-of-custody forms. The temperatures of the coolers were recorded as part of the check-in procedure, and were less than the maximum acceptable temperature of 6 degrees Celsius (°C).

The analytical results for these samples were reviewed in accordance with the requirements specified in EPA National Functional Guidelines (EPA, 2008), the analytical methods referenced by the laboratory, Amec Foster Wheeler data review procedures, and the laboratory quality control limits. The EPA guidelines referenced above were written specifically for the Contract Laboratory Program, and have been modified for the purposes of this data quality review where they differ from EPA SW-846 method requirements.

All of the certified laboratory reports were reviewed to assess the following criteria: chain-of-custody compliance; holding time compliance; presence or absence of laboratory contamination as demonstrated by method and trip blanks; laboratory control samples (LCS) and LCS duplicates (LCSD) and matrix spike (MS) samples; and analytical precision as the relative percent (%) difference between replicate sample results (i.e., laboratory and field duplicates) or MS and matrix spike duplicates (MSD). This level of data review is equivalent to an EPA Level 2A data review.

Samples were analyzed for the methods identified in the introduction to this report and were evaluated for the following criteria.

1. Holding Times – Acceptable.

The pH of each sample was measured prior to analysis, and the pH of sample MW-A4 (XOM061914-01) was equal to 7 at the time of analysis, above the method required pH of 2. The holding time for samples not preserved at a pH of 2 is 7 days, and the sample was analyzed within the holding time.

- 2. Blanks Acceptable.
- LCS/LCSD Acceptable except as noted:

<u>EPH by NWTPH-EPH:</u> The recoveries for C8-C10 aliphatics and C10-C12 aliphatics were 5 and 26 percent, below the control limits of 50 to 150 and 70 to 130 percent, in the aliphatic range LCS analyzed on June 27, 2014. These ranges were not detected in the associated samples; therefore, the results are rejected due to the possible low analytical bias.

The recovery for C10-C12 aromatics was 61 percent, below the control limits of 70 to 130 percent, in the aromatic range LCS analyzed in June 27, 2014. This range was not detected in the associated samples; therefore, the results are qualified as estimated and flagged with a "J" due to the possible low analytical bias.

The recoveries for C8-C10 aliphatics and C10-C12 aliphatics were 26 and 49 percent, below the control limits of 50 to 150 and 70 to 130 percent, in the aliphatic range LCS analyzed on July 1, 2014. The results for these ranges were rejected in the samples that were below detection, and were qualified as estimated and flagged with a "J" in the samples with detections.

4. **MS/MSD** – Acceptable except as noted:

<u>EPH by NWTPH-EPH:</u> The recoveries for C8-C10 aliphatics and C10-C12 aliphatics were below the control limits in the MS/MSD performed with sample MW-A4 (XOM061914-01).



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Results for these carbon ranges were previously rejected in the associated samples due to low LCS/LCSD recoveries and are not further qualified.

5. **Laboratory Duplicates** – Acceptable except as noted:

<u>TPH as diesel by NWTPH-Dx:</u> The laboratory duplicate relative percent difference (RPD) for C10-C24 was 170 percent in the laboratory duplicate performed with sample XOM061914-06. The laboratory stated extraction difficulties resulted in the low values for the primary analysis. The C10-C24 and C24-C40 results for sample XOM061914-06 were rejected due to the quality control issues encountered with this analysis.

Sample XOM061914-06 was a blind field duplicate sample for XOM061914-02, and the results of the laboratory duplicate reported on the quality control page showed good agreement with the results for sample XOM061914-02. This is further evidence of the analytical issues encountered with the primary analysis of sample XOM061914-06, which supports rejecting the C10-C24 and C24-C40 results for sample XOM061914-06.

6. Field Duplicates – Acceptable except as noted:

Two field duplicates were submitted during this sampling event. Primary and duplicate results are summarized in the table below. The RPDs for the field duplicate are within 30 percent for concentrations greater than five times the reporting limit and the differences are no greater than the reporting limit for sample concentrations less than five times the reporting limit, except for the primary and duplicate results for C10-C24 and C24-C40 for samples XOM061914-02/XOM061914-06. The RPD is not calculated for results that are less than five times the reporting limit, as indicated on the table below by "NC."

As stated above, the C10-C24 and C24-C40 results for field duplicate sample XOM061914-06 are rejected, and are not further qualified due to the field duplicate results.

Sample ID/ Field Duplicate ID	Analyte	Primary Result (µg/L)	Duplicate Result (µg/L)	Reporting Limit (µg/L)	RPD (%)
XOM061914-02/ XOM061914-06	acenaphthene C10-C24 C24-C40	2.55 3360 333	2.71 272 ND	0.0948 93.9 93.9	6 170 NC
XOM061914-03/ XOM061914-07	acenaphthene C10-C24 C24-C40	0.266 3270 272	0.177 2550 230	0.0948 93.9 93.9	NC 25 17

Notes

 μ g/L = micrograms per liter

NC = not calculated

RPD = relative percent difference

7. **Surrogates** – Acceptable except as noted:

<u>EPH by NWTPH-EPH:</u> the surrogate 2-bromonaphthene was recovered at 50 percent, below the control limits of 60 to 140 percent, in the aromatic-range method blank associated with analysis on July 1, 2014. Sample results are not qualified due to surrogate recoveries in associated quality control samples.

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The recovery for one of four surrogates, 2-bromonaphthene, was 54 percent, below the control limits of 60 to 140 percent for sample XOM061914-05. The low recovery equates to a low bias in the samples; therefore, sample results associated with this surrogate are qualified as estimated with detections flagged with a "J" and non-detections flagged with "UJ".

<u>TPH as diesel by NWTPH-Dx:</u> The surrogate recovery for sample XOM061914-06 (MW-A5 FD) was 7 percent, below the control limits of 50 to 150 percent. The laboratory stated in the case narrative that there was insufficient sample volume to re-extract and reanalyze the sample. The C10-C24 and C24-C40 results are rejected due to the low surrogate recovery and the results of the field and laboratory duplicates.

8. Reporting Limits and Laboratory Flags – Acceptable.

OVERALL ASSESSMENT OF DATA

The TA work order 490-55979-7 is 95 percent complete. Evaluation of the data usability is based on EPA's guidance documents. Except for the rejected data, the remaining data are acceptable and meet the project's data quality objectives.

Sample Identifications and Qualified Results

Samula ID	Method	Qualified Analyse	Qualified Result	Qualifier Reason
Sample ID	Wethod	Qualified Analyte		
	ED. 1	C8-C10 Aliphatics	19.2 UR	LCS recoveries
XOM061914-01	EPH	C10-C12 Aliphatics	9.62 UR	
		C10-12 Aromatics	9.62 UJ	
		C8-C10 Aliphatics	18.9 UR	
XOM061914-02	EPH	C10-C12 Aliphatics	9.43 UR	LCS recoveries
		C10-12 Aromatics	9.43 UJ	
	EPH	C8-C10 Aliphatics	19.0 UR	LCS recoveries
	u	C10-C12 Aliphatics	9.52 UR	и
XOM061914-06	"	C10-12 Aromatics	9.81 J	í.
	NWTPH-Dx	C10-C24	272 R	lab/field duplicate RPDs
	"	C24-C40	93.9 UR	and surrogate recovery
VON004044.00	EDII	C8-C10 Aliphatics	18.9 UR	
XOM061914-03	EPH	C10-C12 Aliphatics	9.43 UR	LCS recoveries
VON004044 07	EPH	C8-C10 Aliphatics	18.7 UR	LCS recoveries
XOM061914-07	CFII	C10-C12 Aliphatics	9.35 UR	LC3 recoveries
VON004044 04	EPH	C8-C10 Aliphatics	19.2 UR	LCC recoveries
XOM061914-04	EPN	C10-C12 Aliphatics	9.62 UR	LCS recoveries
		C8-C10 Aliphatics	18.9 UR	
		C10-C12 Aliphatics	17.4 J	LCS recoveries
		C8-C10 Aromatics	47.2 UJ	u
XOM061914-05	EPH	C10-C12 Aromatics	15.1 J	surrogate recovery "
		C12-C16 Aromatics	37.7 UJ	"
		C16-C21 Aromatics	47.2 UJ	u
		C21-C34 Aromatics	47.2 UJ	"
Trip Blank-01		None		

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REFERENCES

EPA, 2008, U.S. EPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review: EPA 540-R-08-001, June.



Memo

To: Leah Vigoren Project: 6103140009 From: Crystal Neirby cc: Project File

Danille Jorgensen

Tel: (206) 342-1760 Fax: (206) 342-1761 Date: April 8, 2014

Subject: ExxonMobil/ADC Site – February 2014 Semiannual Ground Water Sampling

EPA Level 3 Data Quality Review - SDG 490-47364-1

This memorandum presents a summary data quality review for analyses of one primary groundwater sample, one groundwater field duplicate, and six trip blanks collected on February 25, 2014. The samples were submitted to TestAmerica, located in Nashville, Tennessee, a laboratory certified by the Washington State Department of Ecology (Ecology).

The samples were analyzed for the following constituents:

- Volatile organic compounds (VOCs) by U.S. Environmental Protection Agency (EPA)
 Method 8260B (only benzene, toluene, ethylbenzene, total xylenes, and methyl tert-butyl ether were reported);
- Polycyclic aromatic hydrocarbons (PAHs) by EPA Method 8270D with select ion monitoring (SIM);
- Total petroleum hydrocarbons (TPH) as gasoline (reported as C6-C12) by Ecology Method NWTPH-Gx; and
- TPH as diesel (reported as C10-C24) and motor oil (reported as C24-C40) by Ecology Method NWTPH-Dx, with silica gel cleanup.

The sample IDs, sample collection date, laboratory sample ID, and analyses conducted on the samples are listed in the table below.

Sample ID	Sample Collection	Laboratory Sample ID	Requested Analyses
	Date		
MWA7-022514	2/25/14	490-47364-1	VOCs, PAHs, TPH
DUP-022514	2/25/14	490-47364-2	VOCs, PAHs, TPH
Trip Blank	2/25/14	490-47364-3	VOCs
Trip Blank	2/25/14	490-47364-4	VOCs
Trip Blank	2/25/14	490-47364-5	VOCs
Trip Blank	2/25/14	490-47364-6	VOCs
Trip Blank	2/25/14	490-47364-7	VOCs
Trip Blank	2/25/14	490-47364-8	VOCs

The analytical results for these samples were reviewed in accordance with the requirements specified in EPA National Functional Guidelines (EPA, 2008), the analytical methods referenced by the laboratory, AMEC data review procedures, and the laboratory quality control limits. The EPA guidelines referenced above were written



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specifically for the Contract Laboratory Program, and have been modified for the purposes of this data quality review where they differ from EPA SW-846 method requirements.

This certified laboratory report was reviewed to assess the following: chain-of-custody compliance; holding time compliance; presence or absence of laboratory contamination as demonstrated by method and trip blanks; laboratory control samples (LCS) and matrix spike (MS) samples; analytical precision as the relative percent (%) difference between replicate sample results (i.e., laboratory and field duplicates) or MS and matrix spike duplicates (MSD) or LCS and laboratory control sample duplicates (LCSD); initial and continuing calibrations; recalculation of instrument and sample results from the laboratory responses; and comparison of the recalculated results to laboratory reported results. This level of data review is equivalent to EPA Level 3 validation.

Upon receipt by the laboratory, the sample jar information was compared to the chain-of-custody forms. The temperatures of the coolers were recorded as part of the check-in procedure, and were less than the maximum acceptable temperature of 6 degrees Celsius (°C).

Samples were analyzed using the methods identified in the introduction to this report, and the results were evaluated for the following criteria.

- 1. GC/MS Instrument Performance Check (VOCs and PAHs) Acceptable
- 2. **Holding Times** Acceptable.
- 3. Blanks Acceptable.

Trip blanks were submitted with every cooler containing samples for VOC analysis. The sample results were not qualified.

Method blanks were analyzed for every batch of 20 samples for each method reviewed.

- 4. **LCS/LCSD** Acceptable.
- 5. **MS/MSD** Acceptable except as noted:

VOCs by 8260

The recovery of methyl tert-butyl ether (64%) was less than the lower laboratory-specified control limit in the MS analysis performed on sample MWA7-022514. The results for nondetected methyl tert-butyl ether from sample MWA7-022514 was qualified as estimated and flagged with UJ due to potential matrix interference.

PAHs by 8270

The laboratory performed an MS/MSD analysis for sample MWA7-022514. The percent recoveries were within laboratory-specified control limits in the MS/MSD, with the following exceptions. The recoveries of benzo[a]anthracene (43%), benzo[a]pyrene (12%), benzo[b]fluoranthene (12%), benzo[g,h,i]perylene (9%), benzo[k]fluoranthene (13%), chrysene (52%), dibenz(a,h)anthracene (9%), and indeno[1,2,3-cd]pyrene (8%) were less than lower laboratory-specified limits in the MS sample. Additionally, the RPDs between the MS and MSD recoveries were greater than the laboratory-specified control limit for anthracene, benzo[a]anthracene, benzo[a]pyrene, benzo[b]fluoranthene, benzo[g,h,i]perylene, benzo[k]fluoranthene, chrysene, dibenz(a,h)anthracene, fluoranthene, fluorene, indeno[1,2,3-cd]pyrene, phenanthrene, and pyrene. Data limitations are summarized below.



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- AMEC qualified the results for nondetected benzo[a]anthracene, benzo[a]pyrene, benzo[b]fluoranthene, benzo[g,h,i]perylene, benzo[k]fluoranthene, chrysene, dibenz(a,h)anthracene, and indeno[1,2,3-cd]pyrene from sample MWA7-022514 as estimated and flagged the results with UJ due to potential matrix interference and analytical imprecision.
- AMEC qualified the results for nondetected anthracene, fluoranthene, fluorene, phenanthrene, and pyrene from sample MWA7-022514 as estimated and flagged the results with UJ due to analytical imprecision.
- **6.** Laboratory Duplicates Acceptable.
- Field Duplicates Acceptable. DUP-022514 was collected as a field duplicate of sample MWA7-022514.
- 8. **Surrogates** Acceptable.
- 9. **Internal Standards** Acceptable.
- 10. Reporting Limits and Laboratory Flags Acceptable.
- 11. Initial Calibrations Acceptable
- 12. Continuing Calibrations Acceptable
- 13. Calculation Check Acceptable

OVERALL ASSESSMENT OF DATA

The TestAmerica sample delivery group 490-47364 is 100 percent complete. Evaluation of the data usability is based on EPA's guidance documents. Few problems were identified, and analytical performance was generally within specified limits. The data are acceptable and meet the project's data quality objectives.

A summary of qualified results is presented in the table below.

Sample Identifications and Qualified Results

Sample ID	Qualified Analyte	Qualified Result	Units	Qualifier
MWA7-022514	Methyl t-butyl ether	0.5	μg/L	UJ
MWA7-022514	benzo[a]anthracene	0.0943	μg/L	IJ
MWA7-022514	benzo[a]pyrene	0.0943	μg/L	UJ
MWA7-022514	benzo[b]fluoranthene	0.0943	μg/L	UJ
MWA7-022514	benzo[g,h,i]perylene	0.0943	μg/L	UJ
MWA7-022514	benzo[k]fluoranthene	0.0943	μg/L	UJ
MWA7-022514	chrysene	0.0943	μg/L	UJ
MWA7-022514	dibenz(a,h)anthracene	0.0943	μg/L	UJ
MWA7-022514	indeno[1,2,3-cd]pyrene	0.0943	μg/L	UJ
MWA7-022514	anthracene	0.0943	μg/L	UJ
MWA7-022514	fluoranthene	0.0943	μg/L	UJ



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Sample ID	Qualified Analyte	Qualified Result	Units	Qualifier
MWA7-022514	fluorene	0.0943	μg/L	UJ
MWA7-022514	phenanthrene	0.0943	μg/L	UJ
MWA7-022514	pyrene	0.0943	μg/L	UJ

REFERENCES

EPA, 2008, U.S. EPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review: EPA 540-R-08-001, June.



Memo

To: Leah Vigoren Project: 6103140009 From: Crystal Neirby cc: Project File

Tel: (206) 342-1760 Fax: (206) 342-1761 Date: January 21, 2015

Subject: ExxonMobil/ADC Site – TestAmerica Analytical Split Groundwater Sampling
Data Quality Review – SDGs 490-62707-1, 490-65219-1, 490-66967-1, 490-68031-1, and
490-69152-1

This memorandum presents a summary data quality review for analyses of 22 primary groundwater samples, four groundwater field duplicate samples, and five trip blanks collected during four separate sampling events that took place between September and December 2014. The samples were submitted to TestAmerica, located in Nashville, Tennessee, a laboratory certified by the Washington State Department of Ecology (Ecology).

The samples were analyzed for the following analytes:

- Selected volatile organic compounds (VOCs) (benzene, toluene, ethylbenzene, m,p-xylenes, o-xylenes, total xylenes, and methyl tert-butyl ether) by U.S. Environmental Protection Agency (EPA) Method 8260B;
- Polycyclic aromatic hydrocarbons (PAHs) by EPA Method 8270D with select ion monitoring (SIM);
- Total petroleum hydrocarbons (TPH) as gasoline by Ecology Method NWTPH-Gx; and
- TPH as diesel and motor oil by Ecology Method NWTPH-Dx (analyses were performed with and without silica gel cleanup).

The sample IDs, well locations, laboratory sample delivery group numbers, sample collection dates, and requested analyses are listed in the table below.

			Sample Collection	Requested
Sample ID	Monitoring Well ID	Laboratory SDG	Date	Analyses
XOM093014-01	MW-A4	490-62707-1	9/30/2014	all
XOM093014-02	MW-A6	490-62707-1	9/30/2014	all
XOM093014-03	MW-A5	490-62707-1	9/30/2014	all
XOM093014-04	MW-A2	490-62707-1	9/30/2014	all
XOM093014-05	MW-40R	490-62707-1	9/30/2014	all
XOM093014-11	Field Duplicate of	490-62707-1	9/30/2014	all
	MW-A2			
Trip Blank-01		490-62707-1	9/30/2014	VOCs
XOM102914-01	MW-A4	490-65219-1	10/29/2014	all



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			Sample	
			Collection	Requested
Sample ID	Monitoring Well ID	Laboratory SDG	Date	Analyses
XOM102914-02	MW-A5	490-65219-1	10/29/2014	all
XOM102914-03	MW-A6	490-65219-1	10/29/2014	all
XOM102914-04	MW-A2	490-65219-1	10/29/2014	all
XOM102914-05	MW-40R	490-65219-1	10/29/2014	all
XOM102914-11	Field Duplicate of MW-A2	490-65219-1	10/29/2014	all
Trip Blank		490-65219-1	10/29/2014	VOCs
XOM111914-01	MW-A2	490-66967-1	11/19/2014	all
XOM111914-02	MW-40R	490-66967-1	11/19/2014	all
XOM112014-03	MW-A4	490-66967-1	11/20/2014	all
XOM112014-04	MW-A5	490-66967-1	11/20/2014	all
XOM112014-05	MW-A6	490-66967-1	11/20/2014	all
XOM111914-11	Field Duplicate of MW-A2	490-66967-1	11/19/2014	all
Trip Blank		490-66967-1	11/20/2014	VOCs
XOM120514-01	MW-A4	490-68031-1	12/5/2014	all
XOM120514-02	MW-A5	490-68031-1	12/5/2014	all
Trip Blank		490-68031-1	12/5/2014	VOCs
XOM121714-01	MW-A5	490-69152-1	12/17/2014	all
XOM121714-02	MW-A6	490-69152-1	12/17/2014	all
XOM121714-03	MW-40R	490-69152-1	12/17/2014	all
XOM121714-04	MW-A4	490-69152-1	12/17/2014	all
XOM121714-05	MW-A2	490-69152-1	12/17/2014	all
XOM121714-11	Field Duplicate of MW-A2	490-69152-1	12/17/2014	all
Trip Blank		490-69152-1	12/17/2014	VOCs

The analytical results for these samples were reviewed in accordance with the requirements specified in EPA National Functional Guidelines (EPA, 2008), the analytical methods referenced by the laboratory, Amec Foster Wheeler data review procedures, and the laboratory quality control limits. The EPA guidelines referenced above were written specifically for the Contract Laboratory Program, and have been modified for the purposes of this data quality review where they differ from EPA SW-846 method requirements.

All of the certified laboratory reports were reviewed to assess the following criteria: chain-of-custody compliance; holding time compliance; presence or absence of laboratory contamination as demonstrated by method and trip blanks; laboratory control samples (LCS) and LCS duplicates (LCSD) and matrix



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spike (MS) samples; and analytical precision as the relative percent (%) difference between replicate sample results (i.e., laboratory and field duplicates) or MS and matrix spike duplicates (MSD). This level of data review is equivalent to an EPA Level 2A data review.

Upon receipt by the laboratory, information from the sample jars was compared to the chain-of-custody forms. The temperatures of the coolers were recorded as part of the check-in procedure, and were less than the maximum acceptable temperature of 6 degrees Celsius (°C), except for the following:

• The cooler containing samples collected from monitoring wells MW-A4 and MW-A5 on November 20, 2014, was received by the laboratory several days after the samples had been collected at a temperature exceeding 6 °C. The purpose of the samples addressed in this data review was to compare groundwater analytical results for the same samples at two separate laboratories. Samples MW-A4 and MW-A5, collected on November 20, 2014, were resampled on December 5, 2014. So that true split samples for comparison, the results from December 5, 2014, are evaluated here, and the results for samples collected from these two wells on November 20, 2014, are rejected.

Samples were analyzed using the methods identified in the introduction to this report, and the results were evaluated for the following criteria.

1. **Holding Times** – Acceptable except as noted:

<u>BTEX by 8260B and TPH-G by NWTPH-Gx</u>: Though the samples were collected in preserved bottles, when verified by the laboratory, the pH of the following samples was not at the method required pH of <2: XOM093014-1, XOM102914-02, XOM112014-03, XOM120514-01, and XOM121714-04.

The technical holding time for samples not preserved at a pH of <2 is 7 days from collection to analysis. Samples that were analyzed past this holding time are qualified as estimated with detected results flagged with a "J" and non-detected results flagged with a "UJ."

- 2. Blanks Acceptable except as noted:
- 3. **LCS/LCSD** Acceptable except as noted:

TPH-D and TPH-O by NWTPH-Dx (with silica gel)

The recovery for C10-C24 in the LCS associated with samples in work order 490-69152 and analysis batch 217902 was 36 percent, below the control limits of 51 to 132 percent. The C10-C24 and C24-C40 results in the associated sample, XOM121714-05, were qualified as estimated and flagged with a "J" due to the potential low bias.

- 4. **MS/MSD** Acceptable
- 5. **Laboratory Duplicates** Acceptable except as noted:

TPH-D and TPH-O by NWTPH-Dx (with silica gel)

The relative percent difference (RPD) for C10-C24 was 45 percent and for C24-C40 in laboratory duplicate samples was 67 percent, greater than the control limit of 41 percent. The laboratory duplicate analysis was performed with sample XOM120514-02, and sample results were also qualified due to low surrogate recoveries (see below). Sample results are not qualified further as a result of the laboratory duplicate analyses.

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The RPD for C24-C40 in the laboratory duplicate analysis performed with sample XOM121714-11 was 58 percent, greater than the control limit of 41 percent,. The C24-C40 results for sample XOM121714-11 were qualified as estimated and flagged with a "J."

TPH-D and TPH-O by NWTPH-Dx (without silica gel)

The RPD for C10-C24 in the laboratory duplicate analysis performed with sample XOM121714-05 was 60 percent, greater than the control limits of 41 percent. The results for C10-C24 and C24-C40 were qualified as estimated in sample XOM121714-05 and flagged with a "J."

6. **Field Duplicates** – Acceptable.

Field duplicates were collected during each of the sampling events and are identified in the table below. The field duplicate RPD is not calculated if both the primary and duplicate results are not at least five times greater than the reporting limit, as indicated in the table below by "NC." In these cases, the difference between the primary and duplicate results should not exceed the value of the reporting limit. As shown in the table below, RPDs were acceptable where calculated. In cases when the RPDs could not be calculated, the differences between the primary and duplicate results were acceptable, except as indicated in the table below by **bold** type. The primary and field duplicate results that do not have acceptable RPDs are qualified as estimated and flagged with a "J.", except where previously qualified due to additional non-compliant quality control results

		Primary	Duplicate	Reporting	
Sample ID/		Result	Result	Limit	RPD
Field Duplicate ID	Analyte	(µg/L)	(µg/L)	(µg/L)	(%)
XOM093014-04/	C10-C24 (no SG)	1050	834	95.7	23
XOM093014-11	C24-C40 (no SG)	168	181	95.7	NC
	C10-C24 (with SG)	594	313	95.7	NC
XOM102914-04/	1-methylnaphthalene	0.508	0.533	0.0948	5
XOM102914-11	acenaphthene	0.476	0.482	0.0948	1
	fluorene	0.529	0.560	0.0948	6
	C6-C12	156	160	100	NC
	C10-C24 (with SG)	678	1140	94.3	51
	C24-C40 (with SG)	94.3 U	141	94.3	NC
	C10-C24 (no SG)	1190	3000	94.3	86
	C24-C40 (no SG)	305	784	94.3	NC
XOM111914-01/	acenaphthene	0.589	0.531	0.0943	10
XOM111914-11	fluorene	0.763	0.644	0.0943	17
	C6-C12	146	100 U	100	NC
	C10-C24 (with SG)	345	393	93.9	13
	C24-C40 (with SG)	93.9 U	93.9 U	93.9	NC
	C10-C24 (no SG)	938	999	93.9	6



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Sample ID/ Field Duplicate ID	Analyte	Primary Result (µg/L)	Duplicate Result (µg/L)	Reporting Limit (µg/L)	RPD (%)
	C24-C40 (no SG)	197	284	93.9	36
XOM121714-05/	acenaphthene	0.510	0.493	0.0939	3
XOM121714-11	fluorene	0.720	0.710	0.0939	1
	C6-C12	178	165	100	8
	C10-C24 (with SG)	430	952	95.2	76
	C24-C40 (with SG)	95.2 U	164	95.2	NC
	C10-C24 (no SG)	849	805	95.2	5
	C24-C40 (no SG)	158	218	95.2	NC

Notes

μg/L = micrograms per liter RPD= relative percent difference

7. **Surrogates** – Acceptable except as noted:

TPH-G by NWTPH-Gx

<u>Work Order 490-62707-1:</u> Surrogate recoveries for samples XOM093014-01, XOM093014-03, XOM093014-04, and XOM093014-11 were between 151 and 155 percent, respectively, greater than the control limits of 50 to 150 percent. TPH-G was not detected in the samples; therefore, results are not affected by the potential high bias and are not qualified.

TPH-D and TPH-O by NWTPH-Dx (without silica gel)

The surrogate recoveries for samples XOM093014-02 and XOM093014-03 were 6 and 4 percent, respectively, below the control limits of 50 to 150 percent. The TPH-D results are qualified as estimated and flagged with a "J." TPH-O was not detected in the samples; therefore, the results are rejected due to the bias associated with the extremely low surrogate recoveries.

The surrogate recovery for sample XOM093014-05 was 32 percent, also below the control limits of 50 to 150 percent. The TPH-D and TPH-O results in sample XOM093014-05 were qualified as estimated due to the potential low bias.

The surrogate recovery for sample XOM102914-11 was 37 percent, below the control limits of 50 to 150 percent. The TPH-D and TPH-O results in sample XOM102914-11 were qualified as estimated due to the potential low bias.

The surrogate recoveries in samples XOM121714-01, XOM121714-02, XOM121714-03, and XOM121714-11 were between 40 and 47 percent, below the control limits of 50 to 150 percent. The TPH-D and TPH-O results in samples XOM121714-01, XOM121714-02, XOM121714-03, and XOM121714-11were qualified as estimated due to the potential low bias.

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The surrogate recoveries in the laboratory duplicates performed with samples XOM121714-05 and XOM121714-03 were below the control limits of 50 to 150 percent at 37 and 40 percent, respectively. Associated sample results are not qualified based on surrogate recoveries in quality control samples; therefore, sample results are not qualified due to the low surrogate recoveries.

TPH-D and TPH-O by NWTPH-Dx (with silica gel)

The surrogate recovery in sample XOM093014-05 was 40 percent, below the control limits of 50 to 150 percent. The TPH-D and TPH-O results in sample XOM093014-05 were qualified as estimated due to the potential low bias.

The surrogate recoveries for samples XOM111914-01 and XOM111914-02 were 49 and 44 percent, respectively, below the control limits of 50 to 150 percent. The TPH-D and TPH-O results in samples XOM111914-01 and XOM111914-02 were qualified as estimated due to the potential low bias.

The surrogate recovery for sample XOM120514-02 was 48 percent, below the control limits of 50 to 150 percent. The TPH-D and TPH-O results in sample XOM120514-02 were qualified as estimated due to the potential low bias.

The surrogate recovery for the LCS associated with analysis batch 217902 in work order 490-69152-1 was 37 percent, below the control limits of 50 to 150 percent. Associated samples results are not qualified based on surrogate recoveries in quality control samples; therefore, sample results are not qualified due to the low surrogate recovery.

VOCs by EPA 8260B

The surrogate toluene-d8 was recovered at 131 percent in sample XOM121714-04, greater than the control limits of 70 to 130 percent. The affected compounds were not detected in the sample; therefore, results are not affected by the potential high bias and are not qualified.

8. **Reporting Limits and Laboratory Flags** – Acceptable.

The laboratory reported detections between the MDL and RL and qualified these results as estimated with a "J" flag. The results are reported as qualified and are not further qualified as a result of this review.

OVERALL ASSESSMENT OF DATA

Analytical results for TestAmerica sample delivery groups 490-62707-1, 490-65219-1, 490-66967-1, 490-68031-1, and 490-69152-1 are 95 percent complete. Evaluation of data usability is based on EPA's guidance documents. Few problems were identified, and analytical performance was generally within specified limits. Except for the rejected results, the data are acceptable and meet the project's data quality objectives.

A summary of qualified results is presented in the table below.



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Sample Identifications and Qualified Results

Sample ID	Qualified Analyte	Qualified Results	Qualifier Reason
XOM093014-01	benzene	0.50 UJ	
	toluene	0.50 UJ	
	ethylbenzene	0.50 UJ	analyzed past the technical
	total xylenes MTBE	1.5 UJ 0.50 UJ	holding time
	C6-C12	500 UJ	
VON4000044-00	C10-C24 (no SG)	243 J	
XOM093014-02	C24-C40 (no SG)	94.3 UR	low surrogate recovery
XOM093014-03	C10-C24 (no SG)	155 J	ion carregate receivery
XOIVI093014-03	C24-C40 (no SG)	94.3 UR	low surrogate recovery
XOM093014-04	C10-C24 (with SG)	594 J	
7.011100001101	,		field duplicate RPD
XOM093014-05	C10-C24 (no SG)	2,080 J	
	C24-C40 (no SG)	500 J	
	C10-C24 (with SG)	1,540 J	low surrogate recoveries
	C24-C40 (with SG)	165 J	44
XOM093014-11	C10-C24 (with SG)	313 J	field duralizate DDD
Trip Blank-01	none		field duplicate RPD
XOM102914-01	none		
XOM102914-01 XOM102914-02	none		
XOM102914-02 XOM102914-03	none		
+	C10-C24 (no SG)	678 J	
XOM102914-04	C10-C24 (No SG)	1,190 J	
	C24-C40 (with SG)	305 J	field duplicate RPDs
XOM102914-05	none	303 0	neid dupilicate 11 D3
	C10-C24 (no SG)	3000 J	low currogate recovery
XOM102914-11	C24-C40 (no SG)	784 J	low surrogate recovery
	C10-C24 (with SG)	1140 J	field duplicate RPD
	010 024 (Willi 00)	11400	neid daphodie 141 B
Trip Blank	none		
XOM111914-01	C10-C24 (with SG)	345 J	low surrogate recovery
X0W111014 01	C24-C40 (with SG)	93.9 UJ	
	C24-C40 (no SG)	197 J	field duplicate RPD
XOM111914-02	C10-C24 (with SG)	733 J	low surrogate recovery
	C24-C40 (with SG)	115 J	
XOM112014-03	all	all rejected	results reported from data package 490-68031-1
XOM112014-04	all	all rejected	results reported from data package 490-68031-1
XOM112014-05	none		
XOM111914-11	C24-C40 (no SG)	284 J	field duplicate RPD
Trip Blank	none		
XOM120514-01	none		



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Sample ID	Qualified Analyte	Qualified Results	Qualifier Reason
XOM120514-02	C10-C24 C24-C40	2,090 J 184 J	low surrogate recovery
Trip Blank	none		
XOM121714-01	C10-C24 (no SG) C24-C40 (no SG)	3560 J 612 J	low surrogate recovery
XOM121714-02	C10-C24 (no SG) C24-C40 (no SG)	2770 J 383 J	low surrogate recovery
XOM121714-03	C10-C24 (no SG) C24-C40 (no SG)	2040 J 644 J	low surrogate recovery
XOM121714-04	C6-C12	500 UJ	analyzed past the technical holding time
XOM121714-05	C10-C24 (with SG) C24-C40 (with SG) C10-C24 (no SG) C24-C40 (no SG)	430 J 95.2 UJ 849 J 158 J	LCS recoveries laboratory duplicate RPD
XOM121714-11	C10-C24 (with SG) C24-C40 (with SG) C10-C24 (no SG) C24-C40 (no SG)	952 J 164 J 805 J 218 J	field duplicate RPD laboratory duplicate RPD surrogate recoveries
Trip Blank	none		

REFERENCES

EPA, 2008, U.S. EPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review: EPA 540-R-08-001, June.



Memo

To: Leah Vigoren Project: 6103140009 From: Crystal Neirby cc: Project File

Tel: (206) 342-1760 Fax: (206) 342-1761 Date: January 21, 2015

Subject: ExxonMobil/ADC Site – June 2014 Split Groundwater Sampling

Data Quality Review – Eurofins SDG 14-06-1614

This memorandum presents a summary data quality review for analyses of two primary groundwater samples and one trip blank collected on June 19, 2014. The samples were submitted to Eurofins CalScience, located in Garden Grove, California, a laboratory certified by the Washington State Department of Ecology (Ecology). The samples were analyzed for the following analytes:

- Volatile organic compounds (VOCs) by EPA Method 8260B (only benzene, toluene, ethylbenzene, total xylenes, methyl tert-butyl ether, 1,2-dibromoethane, 1.2-dichloroethane, and hexane were reported);
- Polycyclic aromatic hydrocarbons (PAHs) by EPA Method 8270C with select ion monitoring (SIM) (only 1-methylnaphthalene, 2-methylnaphthlane, and naphthalene were reported);
- Total petroleum hydrocarbons (TPH) as diesel (TPH-D) (reported as C10-C24) and motor oil (reported as C24-C40) by NWTPH-Dx with silica gel cleanup;
- Extractable petroleum hydrocarbons (EPH) by Ecology Method NWTPH-EPH; and
- Volatile petroleum hydrocarbons (VPH) by Ecology Method NWTPH-VPH.

The sample IDs, sample collection dates, laboratory sample IDs, and analyses conducted on the samples are listed in the table below.

Sample ID	Well ID	Sample	Laboratory	Requested Analyses
		Collection Date	Sample ID	
XOM061914-08	MW-A5	6/19/2014		all
XOM061914-09	MW-A6	6/19/2014		all
Trip Blank-02	Trip Blank	6/19/2014		VOCs

Upon receipt by the laboratory, information from the sample jars was compared to the chain-of-custody forms. The temperatures of the coolers were recorded as part of the check-in procedure, and were less than the maximum acceptable temperature of 6 degrees Celsius (°C).

The analytical results for these samples were reviewed in accordance with the requirements specified in EPA National Functional Guidelines (EPA, 2008), the analytical methods referenced by the laboratory, Amec Foster Wheeler data review procedures, and the laboratory quality control limits. The EPA guidelines referenced above were written specifically for the Contract Laboratory Program, and have



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been modified for the purposes of this data quality review where they differ from EPA SW-846 method requirements.

All of the certified laboratory reports were reviewed to assess the following: chain-of-custody compliance; holding time compliance; presence or absence of laboratory contamination as demonstrated by method and trip blanks; laboratory control samples (LCS) and LCS duplicates (LCSD) and matrix spike (MS) samples; and analytical precision as the relative percent (%) difference between replicate sample results (i.e., laboratory and field duplicates) or MS and matrix spike duplicates (MSD). This level of data review is equivalent to an EPA Level 2A data review.

Samples were analyzed for the methods identified in the introduction to this report and were evaluated for the following criteria.

- 1. **Holding Times** Acceptable.
- 2. Blanks Acceptable.
- LCS/LCSD Acceptable except as noted:

The LCS recovery for o-xylene was 126 percent, which is greater than the control limits of 74 to 122 percent. The high recovery equates to a possible high bias in the samples. Because o-xylene was not detected in the samples, sample results are not affected by the possible high bias and are not qualified.

- 4. **MS/MSD** Acceptable.
- 5. **Laboratory Duplicates** Acceptable.
- 6. Field Duplicates Acceptable.

Field duplicates were not submitted.

- 7. **Surrogates** Acceptable.
- 8. Reporting Limits and Laboratory Flags Acceptable.

OVERALL ASSESSMENT OF DATA

The CalScience work order 14-06-1614 is 100 percent complete. Evaluation of the data usability is based on EPA's guidance documents. Few problems were identified and analytical performance was generally within specified limits. The data are acceptable and meet the project's data quality objectives.

Sample Identifications and Qualified Results

Sample ID	Qualified Analyte
XOM061914-08	none
XOM061914-09	none
Trip Blank-02	none

REFERENCES

EPA, 2008, U.S. EPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review: EPA 540-R-08-001, June.



Memo

To: Leah Vigoren Project: 6103140009 From: Crystal Neirby cc: Project File

Tel: (206) 342-1760 Fax: (206) 342-1761 Date: January 21, 2015

Subject: ExxonMobil/ADC Site – Eurofins Analytical Split Groundwater Sampling
Data Quality Review – SDGs 14-08-2237, 14-10-0161, 14-10-2521, 14-11-1758, 14-12-

0694, and 14-12-1855

This memorandum presents a summary data quality review for analyses of 33 primary groundwater samples, five groundwater field duplicate samples, and six trip blanks collected during five separate sampling events that took place between August and December 2014. The samples were submitted to Eurofins Calscience, located in Garden Grove, California, a laboratory certified by the Washington State Department of Ecology (Ecology).

The samples were analyzed for the following analytes:

- Selected volatile organic compounds (VOCs) (benzene, toluene, ethylbenzene, m,p-xylenes, o-xylenes, total xylenes, and methyl tert-butyl ether) by U.S. Environmental Protection Agency (EPA) Method 8260B;
- Polycyclic aromatic hydrocarbons (PAHs) by EPA Method 8270C with select ion monitoring (SIM);
- Total petroleum hydrocarbons (TPH) as gasoline by Ecology Method NWTPH-Gx; and
- TPH as diesel and motor oil by Ecology Method NWTPH-Dx both with and without silica gel cleanup.

The sample IDs, well locations, laboratory sample delivery group numbers, sample collection dates, and requested analyses are listed in the table below.

Sample ID	Monitoring Well ID	Laboratory SDG	Sample Collection Date	Requested Analyses
XOM082614-12	MW-A4	14-08-2237	8/26/2014	all
XOM082614-13	MW-A8	14-08-2237	8/26/2014	all
XOM082614-14	MW-A5	14-08-2237	8/26/2014	all
XOM082614-15	MW-A6	14-08-2237	8/26/2014	all
XOM082614-16	MW-A3	14-08-2237	8/26/2014	all
XOM082714-17	MW-A1	14-08-2237	8/27/2014	all
XOM082714-18	MW-A2	14-08-2237	8/27/2014	all
XOM082714-19	MW-19	14-08-2237	8/27/2014	all
XOM082714-20	MW-40R	14-08-2237	8/27/2014	all
XOM082714-21	MW-11	14-08-2237	8/28/2014	all
XOM082714-22	MW-A7	14-08-2237	8/27/2014	all



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			Sample	Requested
Sample ID	Monitoring Well ID	Laboratory SDG	Collection Date	Analyses
XOM082714-24	Field duplicate of	14-08-2237	8/28/2014	all
	MW-A2			
Trip Blank-03		14-08-2237	8/28/2014	VOCs
XOM093014-06	MW-A4	14-10-0161	9/30/2014	all
XOM093014-07	MW-A6	14-10-0161	9/30/2014	all
XOM093014-08	MW-A5	14-10-0161	9/30/2014	all
XOM093014-09	MW-A2	14-10-0161	9/30/2014	all
XOM093014-10	MW-40R	14-10-0161	9/30/2014	all
XOM093014-12	Field Duplicate of	14-10-0161	9/30/2014	all
	MW-A2			
Trip Blank-02		14-10-0161	9/30/2014	VOCs
XOM102914-06	MW-A4	14-10-2521	10/29/2014	all
XOM102914-07	MW-A5	14-10-2521	10/29/2014	all
XOM102914-08	MW-A6	14-10-2521	10/29/2014	all
XOM102914-09	MW-A2	14-10-2521	10/29/2014	all
XOM102914-10	MW-40R	14-10-2521	10/29/2014	all
XOM102914-12	Field Duplicate of	14-10-2521	10/29/2014	all
	MW-A2			
Trip Blank		14-10-2521	10/29/2014	VOCs
XOM111914-06	MW-A2	14-11-1758	11/19/2014	all
XOM111914-07	MW-40R	14-11-1758	11/19/2014	all
XOM112014-08	MW-A4	14-11-1758	11/20/2014	all
XOM112014-09	MW-A5	14-11-1758	11/20/2014	all
XOM112014-10	MW-A6	14-11-1758	11/20/2014	all
XOM111914-12	Field Duplicate of	14-11-1758	11/19/2014	all
	MW-A2			
Trip Blank		14-11-1758	11/20/2014	VOCs
XOM120514-03	MW-A4	14-12-0694	12/5/2014	all
XOM120514-04	MW-A5	14-12-0694	12/5/2014	all
Trip Blank		14-12-0694	12/5/2014	VOCs
XOM121714-06	MW-A5	14-12-1855	12/17/2014	all
XOM121714-07	MW-A6	14-12-1855	12/17/2014	all
XOM121714-08	MW-40R	14-12-1855	12/17/2014	all
XOM121714-09	MW-A4	14-12-1855	12/18/2014	all
XOM121714-10	MW-A2	14-12-1855	12/18/2014	all



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Sample ID	Monitoring Well ID	Laboratory SDG	Sample Collection Date	Requested Analyses
XOM121714-12	Field Duplicate of	14-12-1855	12/18/2014	all
	MW-A2			
Trip Blank	Trip Blank	14-12-1855	12/18/2014	VOCs

The analytical results for these samples were reviewed in accordance with the requirements specified in EPA National Functional Guidelines (EPA, 2008), the analytical methods referenced by the laboratory, Amec Foster Wheeler data review procedures, and the laboratory quality control limits. The EPA guidelines referenced above were written specifically for the Contract Laboratory Program, and have been modified for the purposes of this data quality review where they differ from EPA SW-846 method requirements.

All of the certified laboratory reports were reviewed to assess the following criteria: chain-of-custody compliance; holding time compliance; presence or absence of laboratory contamination as demonstrated by method and trip blanks; laboratory control samples (LCS) and LCS duplicates (LCSD) and matrix spike (MS) samples; and analytical precision as the relative percent (%) difference between replicate sample results (i.e., laboratory and field duplicates) or MS and matrix spike duplicates (MSD). This level of data review is equivalent to an EPA Level 2A data review.

Upon receipt by the laboratory, information from the sample jars was compared to the chain-of-custody forms. The temperatures of the coolers were recorded as part of the check-in procedure, and were less than the maximum acceptable temperature of 6 degrees Celsius (°C).

Groundwater wells MW-A4 and MW-A5 were resampled on December 5, 2014. The purpose of the samples addressed in this data review was to compare groundwater analytical results from two separate laboratories. The cooler containing samples collected from monitoring wells MW-A4 and MW-A5 on November 20, 2014, was received by the other laboratory several days after the samples had been collected at a temperature exceeding 6°C. So that true split samples were analyzed for comparison, the results from December 5, 2014, are evaluated here, and the results for samples collected from these two wells on November 20, 2014, are rejected.

Samples were analyzed using the methods identified in the introduction to this report, and the results were evaluated for the following criteria.

- 1. **Holding Times** Acceptable.
- 2. Blanks Acceptable except as noted:

PAHs by EPA 8270C

Naphthalene was detected in the method blank associated with work order 14-10-0161 at a concentration between the method detection limit (MDL) and reporting limit (RL) of 0.039 μ g/L. The naphthalene results for the associated samples that were also between the MDL and RL were reported as non-detected at the RL. Sample results that were either greater than the RL or not detected were not affected by the blank contamination and were not qualified.

LCS/LCSD – Acceptable



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- 4. **MS/MSD** Acceptable
- 5. Laboratory Duplicates Acceptable
- 6. **Field Duplicates** Acceptable.

Field duplicates were collected during each of the sampling events and are identified in the table below. The field duplicate relative percent difference (RPD) is not calculated if both the primary and duplicate results are not at least five times greater than the reporting limit, as indicated in the table below with "NC." In these cases, the difference between the primary and duplicate results should not exceed the value of the reporting limit. As shown in the table below, RPDs were acceptable where calculated. In cases when the RPDs could not be calculated, the differences between the primary and duplicate results were acceptable, except for results for TPH as diesel for XOM093014-09 and XOM093014-12. The TPH as diesel results for both the primary and duplicate samples are qualified as estimated and flagged with a "J."

		Primary	Duplicate	Reporting	
Sample ID/		Result	Result	Limit	RPD
Field Duplicate ID	Analyte	(µg/L)	(µg/L)	(µg/L)	(%)
XOM082714-18/	TPH as diesel	220	220	100	NC
XOM082714-22	TPH as gasoline	130	120	100	NC
	1-methylnaphthalene	0.075	0.061	0.095	NC
	acenaphthene	0.44	0.37	0.095	NC
	fluorene	0.42	0.34	0.095	NC
XOM093014-09/	TPH as diesel	590	170	100	NC
XOM093014-12	TPH as motor oil	190	<100	100	NC
	TPH as gasoline	130	140	100	NC
	1-methylnapthalene	0.084	<0.095	0.095	NC
	acenaphthene	0.45	0.35	0.095	NC
	fluorene	0.37	0.31	0.095	NC
XOM102914-09/	TPH as diesel (no SG)	500	550	100	10
XOM102914-12	TPH as diesel (with SG)	360	380	100	NC
	TPH as gasoline	180	180	100	NC
	1-methylnaphthalene	1.6	2.1	0.095	27
	acenaphthene	0.61	0.69	0.095	12
	fluorene	1.0	1.2	0.095	18
XOM111914-06/	TPH as diesel (no SG)	220	300	100	NC
XOM111914-12	TPH as diesel (with SG)	190	240	100	NC
	TPH as gasoline	150	160	100	NC
	naphthalene	0.21	0.20	0.096	NC
	1-methylnaphthalene	0.28	0.27	0.096	NC
	acenaphthylene	0.11	0.099	0.096	NC



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Sample ID/ Field Duplicate ID	Analyte	Primary Result (µg/L)	Duplicate Result (µg/L)	Reporting Limit (µg/L)	RPD (%)
·	acenaphthene	0.51	0.48	0.096	6
XOM121814-10/	TPH as diesel (no SG)	320	340	100	NC
XOM121814-12	TPH as diesel (with SG)	260	280	100	NC
	TPH as gasoline	140	160	100	NC
	fluorine	0.60	0.59	0.096	2

Notes

μg/L = micrograms per liter RPD= relative percent difference

- 7. Surrogates Acceptable.
- 8. Reporting Limits and Laboratory Flags Acceptable.

The laboratory reported detections between the MDL and RL and qualified these results as estimated with a "J" flag. The results are reported as qualified and are not further qualified as a result of this review.

OVERALL ASSESSMENT OF DATA

The Eurofins sample delivery groups 14-08-2237, 14-10-0161, 14-10-2521, 14-11-1758, 14-12-0694, and 14-12-1855 are 100 percent complete. Evaluation of the data usability is based on EPA's guidance documents. Few problems were identified, and analytical performance was generally within specified limits. Except for the rejected results, the data are acceptable and meet the project's data quality objectives.

A summary of qualified results is presented in the table below.

Sample Identifications and Qualified Results

Sample ID	Qualified Analyte	Qualified Results	Qualifier Reason
XOM082614-12	none		
XOM082614-13	none		
XOM082614-14	none		
XOM082614-15	none		
XOM082614-16	none		
XOM082714-17	none		
XOM082714-18	none		
XOM082714-19	none		
XOM082714-20	none		
XOM082714-21	none		



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Sample ID	Qualified Analyte	Qualified Results	Qualifier Reason
XOM082714-22	none		
XOM082714-24	none		
Trip Blank-03	none		
XOM093014-06	none		
XOM093014-07	naphthalene	0.095 U	method blank contamination
XOM093014-08	none		
XOM093014-09	TPH as diesel	590 J	field duplicate RPD
XOM093014-10	none		
XOM093014-12	TPH as diesel	170 J	field duplicate RPD
Trip Blank-02	none		
XOM102914-06	none		
XOM102914-07	none		
XOM102914-08	all	all rejected	results reported from data package 14-12-0694
XOM102914-09	all	all rejected	results reported from data package 14-12-0694
XOM102914-10	none		
XOM102914-12	none		
Trip Blank	none		
XOM111914-06	none		
XOM111914-07	none		
XOM112014-08	none		
XOM112014-09	none		
XOM112014-10	none		
XOM111914-12	none		
Trip Blank	none		
XOM120514-03	none		
XOM120514-04	none		
Trip Blank	none		
XOM121714-06	none		
XOM121714-07	none		
XOM121714-08	none		
XOM121714-09	none		
XOM121714-10	none		
XOM121714-12	none		
Trip Blank	none		



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REFERENCES

EPA, 2008, U.S. EPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review: EPA 540-R-08-001, June.



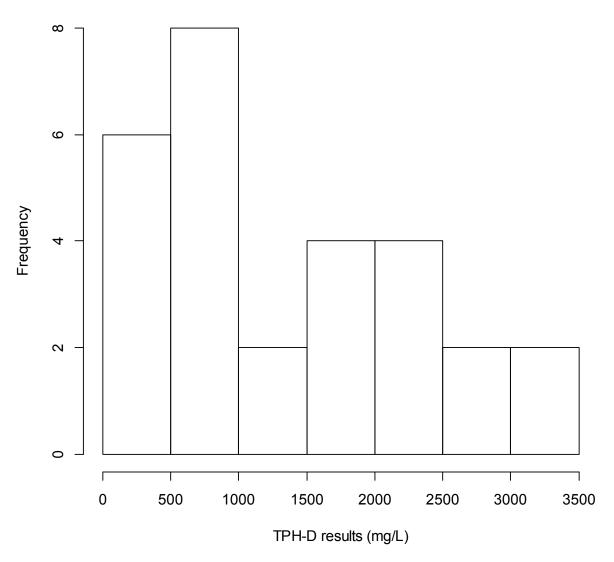
ATTACHMENT C

Statistical Data Input and Program Output

```
"Well.ID","Date","Analyte","TestAmerica","Eurofins"
```

- "1","MW-A1","8/27/2014","TPH-D",1240,590
- "2","MW-A2","8/27/2014","TPH-D",565,220
- "3","MW-A2","9/30/2014","TPH-D",594,590
- "4","MW-A2","10/29/2014","TPH-D",678,360
- "5","MW-A2","8/27/2014","TPH-D",602,220
- "6","MW-A2","9/30/2014","TPH-D",313,170
- "7","MW-A2","10/29/2014","TPH-D",1140,380
- "8","MW-A2","11/19/2014","TPH-D",345,190
- "9","MW-A2","11/19/2014","TPH-D",393,240
- "10","MW-A2","12/18/2014","TPH-D",430,260
- "11","MW-A2","12/18/2014","TPH-D",805,280
- "12","MW-A3","8/26/2014","TPH-D",906,120
- "13","MW-A4","10/29/2014","TPH-D",298,120
- "14","MW-A5","6/19/2014","TPH-D",3360,360
- "15","MW-A5","8/26/2014","TPH-D",2160,300
- "16","MW-A5","9/30/2014","TPH-D",2940,140
- "17","MW-A5","10/29/2014","TPH-D",2360,380
- "18","MW-A5","12/05/2014","TPH-D",2090,170
- "19","MW-A5","12/17/2014","TPH-D",2810,230
- "20","MW-A6","6/19/2014","TPH-D",3270,130
- "21","MW-A6","10/29/2014","TPH-D",1730,190
- "22","MW-A6","12/17/2014","TPH-D",2470,110
- "24","MW-19","8/27/2014","TPH-D",409,190
- "25","MW-40R","8/27/2014","TPH-D",1610,690
- "26","MW-40R","9/30/2014","TPH-D",1540,540
- "27","MW-40R","10/29/2014","TPH-D",637,730
- "28","MW-40R","11/19/2014","TPH-D",733,590
- "29","MW-40R","12/19/2014","TPH-D",1610,550

Histogram of TestAmerica Groundwater Data

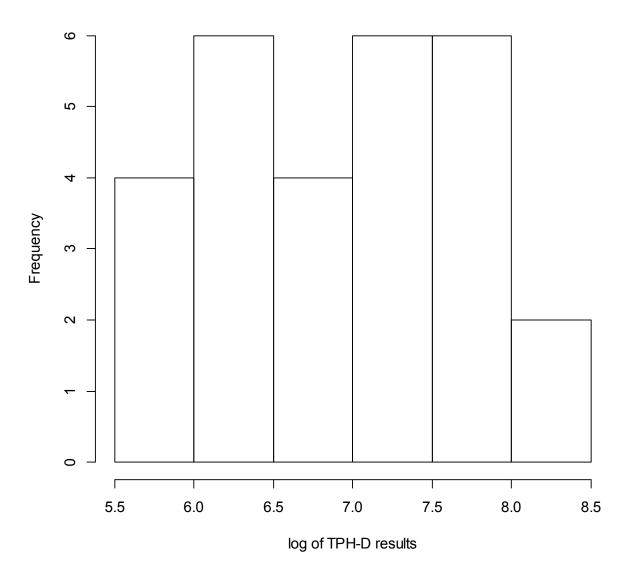


Shapiro-Wilk normality test

data: ExxonInput\$TestAmerica W = 0.8842, p-value = 0.004975

The TestAmerica data are not normally distributed, as is typical of environmental data.

Histogram of log of TestAmerica Groundwater Data



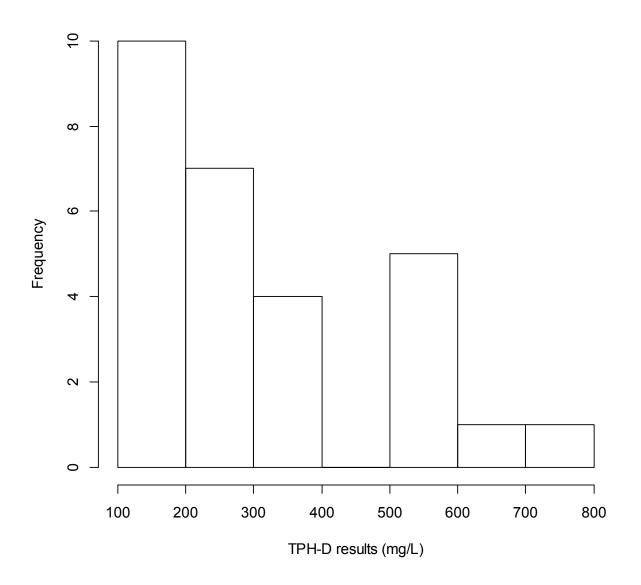
Shapiro-Wilk normality test

data: ExxonInput\$TA2

W = 0.9366, p-value = 0.09076

The log-transformed data are more nearly normally distributed.

Histogram of Eurofins Groundwater Data

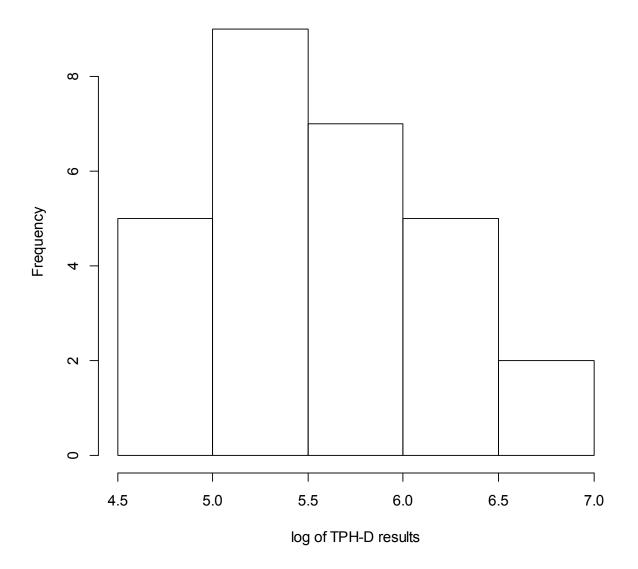


Shapiro-Wilk normality test

data: ExxonInput\$Eurofins W = 0.8773, p-value = 0.003502

The Eurofins data are not normally distributed, as is typical of environmental data.

Histogram of log of Eurofins Groundwater Data



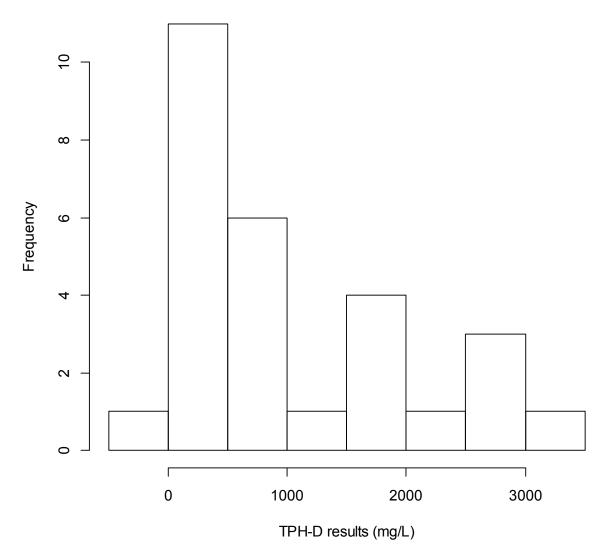
Shapiro-Wilk normality test

data: ExxonInput\$EU2

W = 0.9446, p-value = 0.1443

The log-transformed Eurofins data are also more nearly normally distributed.

Difference Between TestAmerica and Eurofins Groundwater Data



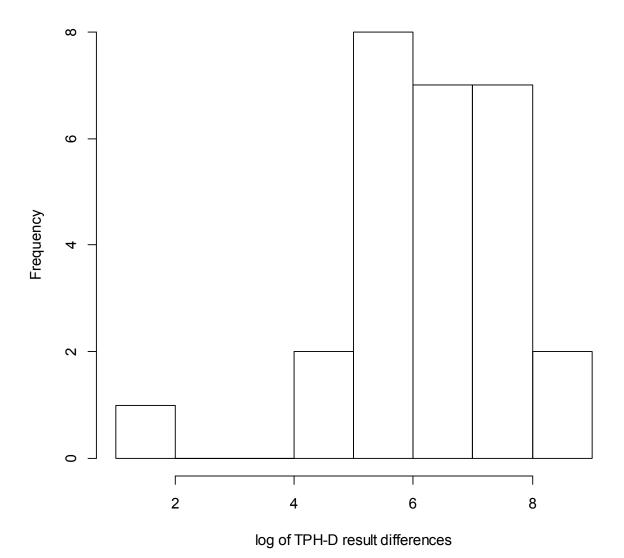
Shapiro-Wilk normality test

data: ExxonInput\$Diff

W = 0.8605, p-value = 0.001534

The paired differences between the TestAmerica and Eurofins results are not normally distributed.

log of TestAmerica & Eurofins Groundwater Data Differences



Shapiro-Wilk normality test

data: ExxonInput\$Diff2

W = 0.8683, p-value = 0.002708

The log of the paired differences between the TestAmerica and Eurofins results are better, but still not normally distributed.

Bartlett test of homogeneity of variances

data: list(ExxonInput\$EU2, ExxonInput\$TA2)
Bartlett's K-squared = 2.2935, df = 1, p-value = 0.1299
The two sets of log-transformed groundwater data have reasonably homogenous variance.

Paired t-test

data: ExxonInput\$TA2 and ExxonInput\$EU2
t = 7.3013, df = 27, p-value = 7.465e-08
alternative hypothesis: true difference in means is not equal to 0
95 percent confidence interval:
0.9519751 1.6961636
sample estimates:
mean of the differences
1.324069

Using the log-transformed results, there is a highly significant difference between the two sets of data. This is a better check of the difference significance than in the original units, because the log transformation adjusts for skewed distributions.