STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
PO Box 47600 • Olympia, Washington 98504-7600 • 360-407-6300

November 8, 2023

Mark Nelson
Nelson Petroleum
1125 SW 80th Street
Everett, WA 98203
markn@nelsonpetroleum.com

SENT BY EMAIL ONLY

Re: No Further Action opinion for the following Property associated with a contaminated Site

Site name:	Nelson Distributing Granite Falls
Property address:	201 W. Stanley St, Granite Falls, Snohomish County, WA 98252
Facility/Site ID:	48574863
Cleanup Site ID:	12684
VCP Project No.:	NW2982

Dear Mark Nelson:

The Washington State Department of Ecology (Ecology) received your request on August 10, 2022, for an opinion regarding the sufficiency of the Property cleanup associated with the Nelson Distributing Granite Falls (Site) under the Voluntary Cleanup Program (VCP).[1] This letter provides our opinion. We are providing this opinion under the authority of the Model Toxics Control Act (MTCA),[2] chapter 70A.305 Revised Code of Washington (RCW).[3]

Opinion

Ecology has determined that no further remedial action is necessary at the Property to clean up contamination associated with the Site. However, further remedial action remains necessary elsewhere at the Site to clean up contamination.

Ecology bases this opinion on an analysis of whether the remedial action meets the substantive requirements of MTCA and its implementing regulations, which are specified in chapter 70A.305 RCW and chapter 173-340 WAC[4] (collectively called "MTCA").

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

Property Description

This opinion applies only to the Property described in this section, which was affected by release(s) at the Site and addressed by your cleanup. The Property includes the following parcel of real property in Snohomish County.

- 30061300403400

Enclosure A includes a legal description of the Property and a diagram that shows where the Property is located within the Site.

Site Description

This opinion applies only to the Site described as below. The Site is defined by the nature and extent of contamination associated with the following releases:

- Petroleum (Gasoline, diesel, and heavy oil range) in soil.
- Benzene in soil.
- Petroleum (Diesel range) in groundwater.

Enclosure A includes diagrams of the Site, as currently known to Ecology.

Please note a parcel of real property can be affected by multiple sites. At this time, we have no information that the parcel(s) associated with this Site are affected by other sites.

Basis for the Opinion

Ecology bases this opinion on information in the documents listed in **Enclosure B**.

You can request these documents by filing a records request.[5] For help making a request, contact the Public Records Officer at publicrecordsofficer@ecy.wa.gov or call 360-407-6040. Before making a request, check whether the documents are available on Ecology's Cleanup Site Search web page.[6]

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

[5] https://ecology.wa.gov/About-us/Accountability-transparency/Public-records-requests
[6] https://apps.ecology.wa.gov/gsp/Sitepage.aspx?csid=12684

Analysis of the Cleanup

Ecology has concluded that no further remedial action is necessary at the Property to clean up contamination associated with the Site. However, Ecology has also concluded that further remedial action is still necessary to clean up contamination elsewhere at the Site. Ecology bases its conclusions on the following analysis:

Characterizing the Site

Ecology has determined your completed Site characterization is sufficient for setting cleanup standards for the Site and selecting a cleanup action for the Property. **Enclosure A** describes the Site.

In April of 2020 13 soil borings were installed on the Site. Twenty soil samples were collected and analyzed for gasoline, diesel, oil, benzene, ethylbenzene, toluene, and xylene. The table below shows the number of samples out of 20 that had detections and concentrations above MTCA Method A.

Hazardous Substance Analyzed	Number of Samples with Detections	Number of samples above MTCA Method A
Gasoline	11	8
Diesel	8	4
Oil	1	1
Benzene	3	3
Ethylbenzene	6	0
Toluene	7	0
Xylene	6	0

Five additional groundwater monitoring wells were installed, seven soil samples were collected from the five wells, and analyzed for the same analytes. None of the analytes were detected in any of the soil samples.

Four of the soil samples were analyzed for arsenic, cadmium, chromium, lead, mercury, and 16 semi-volatile organic compounds (including seven carcinogenic compounds). Arsenic was detected in all four samples, with one of four concentrations exceeding the MTCA Method A cleanup level. Chromium and lead were detected in all four soil samples, with all concentrations below their respective MTCA Method A cleanup levels. Cadmium and mercury were not detected in any sample.

Two soil samples had no detections of any of the volatile organic compounds, a third had detections of 10 of 16 semi-volatile organic compounds but with concentrations low enough that the toxic equivalent quantity was below the MTCA Method A cleanup level. The fourth soil sample had detections of 13 of 16 semi-volatile organic compounds with concentrations high enough that the toxic equivalent quantity exceeded the MTCA Method A cleanup level.

In May of 2020, groundwater samples were collected from all ten monitoring wells and analyzed for gasoline, diesel, oil, benzene, ethylbenzene, toluene, and xylene. Gasoline, benzene, ethylbenzene, toluene, and xylene were not detected in any groundwater sample.

Oil was detected in one of ten samples (MW-5), at a concentration below the MTCA Method A cleanup level. The laboratory stated that the chromatographic pattern did not match the standard.

Diesel was detected in four of ten samples (MW-3, MW-4, MW-5, and MW-10), with one (MW-5) of four concentrations exceeding the MTCA Method A cleanup level. The laboratory stated the chromatographic pattern did not match the standard in three wells (MW-3, MW-5, and MW-10).

When the sample from MW-5 was re-analyzed following a silica gel cleanup, neither diesel nor oil were detected. Ecology concluded that the apparent exceedance in MW-5 was due to natural organic materials.

Previous Site characterization actions are described in **Enclosure C**.

Setting cleanup standards for the Site

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

Hazardous Substance	**Method A Soil** (mg/kg)[a]	**Method A Groundwater** (µg/l)[b]
Gasoline	30	1,000
Diesel plus Oil	2,000	500
Benzene	0.03	5

[a] mg/kg = milligrams per kilogram
[b] µg/l = micrograms per liter

A standard horizontal point of compliance, the Property boundary, was used for soil contamination.

A standard vertical point of compliance, fifteen feet, for soils was established in the soils throughout the Site from the ground surface to fifteen feet below the ground surface (ft bgs). Fifteen feet is protective for direct contact with the contaminated soil.

A standard vertical point of compliance, from the uppermost level of the saturated zone to the lowest depth that could potentially be affected, was used for groundwater contamination.

Selecting the cleanup action for the Property

Ecology has determined the cleanup action you selected for the Property meets the substantive requirements of MTCA.

The cleanup action selected was excavation of contaminated soil with transportation off-Site to a permitted facility. These actions meet the minimum requirements for cleanup actions by providing a permanent solution, immediate restoration time frame, provides for confirmation monitoring, and protects human health and the environment. No remediation of groundwater was necessary.

Implementing the cleanup action

Ecology has determined your cleanup of the Property meets the standards set for the Site.

In June of 2016, four aboveground storage tanks (ASTs) were removed and taken off-Site to a permitted facility. Two on-Site buildings were likewise demolished, and the materials taken off-Site to permitted facilities. 2,083 tons of petroleum-contaminated soil were excavated from three areas of the Site and taken off-Site to a permitted facility.

Sixteen soil confirmation samples were collected following the 2016 excavation work.

Confirmation sample results with cleanup level exceedances are shown below:

Sample Location and Depth (ft bgs)	**Contaminant and Concentration with CUL exceedance** (mg/kg)	**Area of Exceedance**
A1EW@6’	Diesel 1,800, Heavy Oil 1,600	Excavation Sidewall, Eastern Property Boundary
A2SW@6’	Gasoline 770, Diesel 11,000	Excavation Sidewall, Southern Property Boundary
A2F3@9’	Benzene 0.49	West Excavation Area Floor (Former AST Area)
A2SWW@6’	Gasoline 150, Benzene 0.36	Excavation Sidewall, Southwest Property Boundary
A2WW@6’	Gasoline 100	Excavation Sidewall, West Property Boundary

In September of 2021, an excavation was performed on the west-adjoining Property to remove soil contaminated with petroleum. 261 tons of contaminated soil were taken off-Site to a permitted facility. Following the 2021 excavation, the following soil cleanup level exceedances remained to the south of the 231 West Stanley Street Property:

Sample Location and Depth (ft bgs)	**Contaminant and Concentration with CUL exceedance** (mg/kg)	**Area of Exceedance**
FS-04@2-3’	Gasoline 410, Benzene 0.44	W Stanley St Right-of-Way
FS-05@5-6’	Gasoline 550	W Stanley St Right-of-Way
FS-05@7-8’	Benzene 0.16	W Stanley St Right-of-Way
FS-06@4.5-5’	Gasoline 950	W Stanley St Right-of-Way
FSTP-05@4’	Gasoline 170	W Stanley St Right-of-Way

In September of 2023, MW-4 was decommissioned and the contaminated soil near the well, totaling 14.21 tons, was taken off-Site to a permitted facility. The base of the excavation was tested with a photoionization detector, which showed that no contamination vapors were present. The contaminated soil had been left in place to avoid damaging the monitoring well.

Based on the results of the 2016, 2021, and 2023 excavations, remaining contamination is found beneath West Stanley Street to the south of the 201 West Stanley Street Property. Additional excavation into the Right-of-Way was not allowed by the City of Granite Falls.

No contaminated soil remains on the Property.

The contamination above Site cleanup levels that remains in the City of Granite Falls right-of-way has not been remediated nor controlled.

Listing of the Site

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

Limitations of the Opinion

Opinion does not settle liability with the state

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

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

To settle liability with the state and obtain protection from contribution claims, a person must enter into a consent decree with Ecology under RCW 70A.305.040(4).[7]

Opinion does not constitute a determination of substantial equivalence

To recover remedial action costs from other liable persons under MTCA, one must demonstrate that the action is the substantial equivalent of an Ecology-conducted or Ecology-supervised action. This opinion does not determine if the action you performed is substantially equivalent. Courts make that determination. See RCW 70A.305.080[8] and WAC 173-340-545.[9]

State is immune from liability

The state, Ecology, and its officers and employees are immune from all liability, and no cause of action of any nature may arise from any act or omission in providing this opinion. See RCW 70A.305.170(6).[10]

Termination of Agreement

Thank you for cleaning up the Property under the Standard VCP process. This opinion terminates the VCP Agreement governing VCP Project No. NW2982. If you should decide to clean up the remainder of the Site, you can re-apply and request additional services under the VCP.

[7] https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.040
[8] https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.080
[9] https://apps.leg.wa.gov/WAC/default.aspx?cite=173-340-545
[10] https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.170

Questions

If you have any questions about this opinion or the termination of the Agreement, please contact me at 360-407-7223 or christopher.maurer@ecy.wa.gov.

Sincerely,

Christopher Maurer

Christopher Maurer, P.E.
Headquarters Section
Toxics Cleanup Program

Enclosures (3): A – Property Legal Description and Diagrams
B – Basis for the Opinion: Documents List
C – Previous Site Characterization

cc by email: Kristin Anderson, LHG, Floyd|Snider, kristin.anderson@floydsnider.com
Brent Kirk, City of Granite Falls, Brent.Kirk@ci.granite-falls.wa.us
Amy Hargrove, Ecology, amy.hargrove@ecy.wa.gov
Treasure Mitchell, Ecology, treasure.mitchell@ecy.wa.gov
TCP Operating Budget Analyst, Ecology, tra.thai@ecy.wa.gov
VCP Fiscal Analyst, Ecology, ecyrevcp@ecy.wa.gov
Ecology Site File

Enclosure A

Property Legal Description and Diagrams

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Property Legal Description

Snohomish County parcel – 30061300403400

Section 13 Township 30 Range 06 Quarter SE - PAR 1 & 2 DESC BELOW EXC WLY 138FT THOF - "PAR 1" DAF - TH PTN SD SEC 13 DAF - BEG NW COR BLK 1 PLAT OF GF TH W 30FT TH N TO N LN OF STANLEY ST TO POBTH W 300FT M/L TO E LN ANDERSON AVE EXT TH N ON SD E LN SD EXT 160FT M/L TO S LN HARTFORD EASTERN RR R/W TH E ALG SD R/W TAP N OF TPB TH S 165 FT M/L TO TPB & "PAR 2" DAF - S 50FT TH PTN ABNDHARTFORD EASTERN RR R/W AKA NPRR CO R/W LY N OF & ADJ TO FDT - BEG NW COR BLK 1 PLAT OF GF TH W 30FT TH N TO N LN STANLEY ST TO POB TH W 300FT M/L TO E LN ANDERSON AVE EXT TH N ON SD E LN EXT 160FTM/L TO S LN HARTFORD EASTERN RR CO R/W TH E ALG SD R/W LN TAP N OF POB TH S 165FT M/L TO POB (AKA RECEIVER PAR OF CITY OF GF BLA BA-2008-001 REC UND AFN 200810100740)

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Diagrams

From Environmental Associates, Inc.'s *Preliminary Subsurface Exploration – Bulk Fuel Facility*, December 9, 2003

Plate 1 ..... Vicinity/Topographic Map

Plate 2 .....Site Plan

Plate 3 ..... Site Plan – Detailed

From Slotta Design & Consulting's (SD&C's), *Phase I and II Environmental Site Assessment Report – Nelson Petroleum Inc.*, April 3, 2008

Figure 4 .....Boring Location Map

From SD&C's, *Site Demolition and Soil Excavation Report – Nelson Petroleum Inc.*, August 28, 2016

Figure 2 ..... Soil Analytical Results

From Floyd|Snider's, *Memorandum – Additional Remedial Excavation Plan*, July 14, 2021

Figure 1 ..... Property Location Map

From Floyd|Snider's, *Memorandum – Data Summary for the Former Nelson Petroleum Property*, April 26, 2021

Figure 1 ..... Property Features (Soil Boring Locations)

From Floyd|Snider's, *Memorandum – Additional Remedial Excavation Plan*, dated July 14, 2021

Figure 2 ..... Excavation and Confirmation Sample Summary

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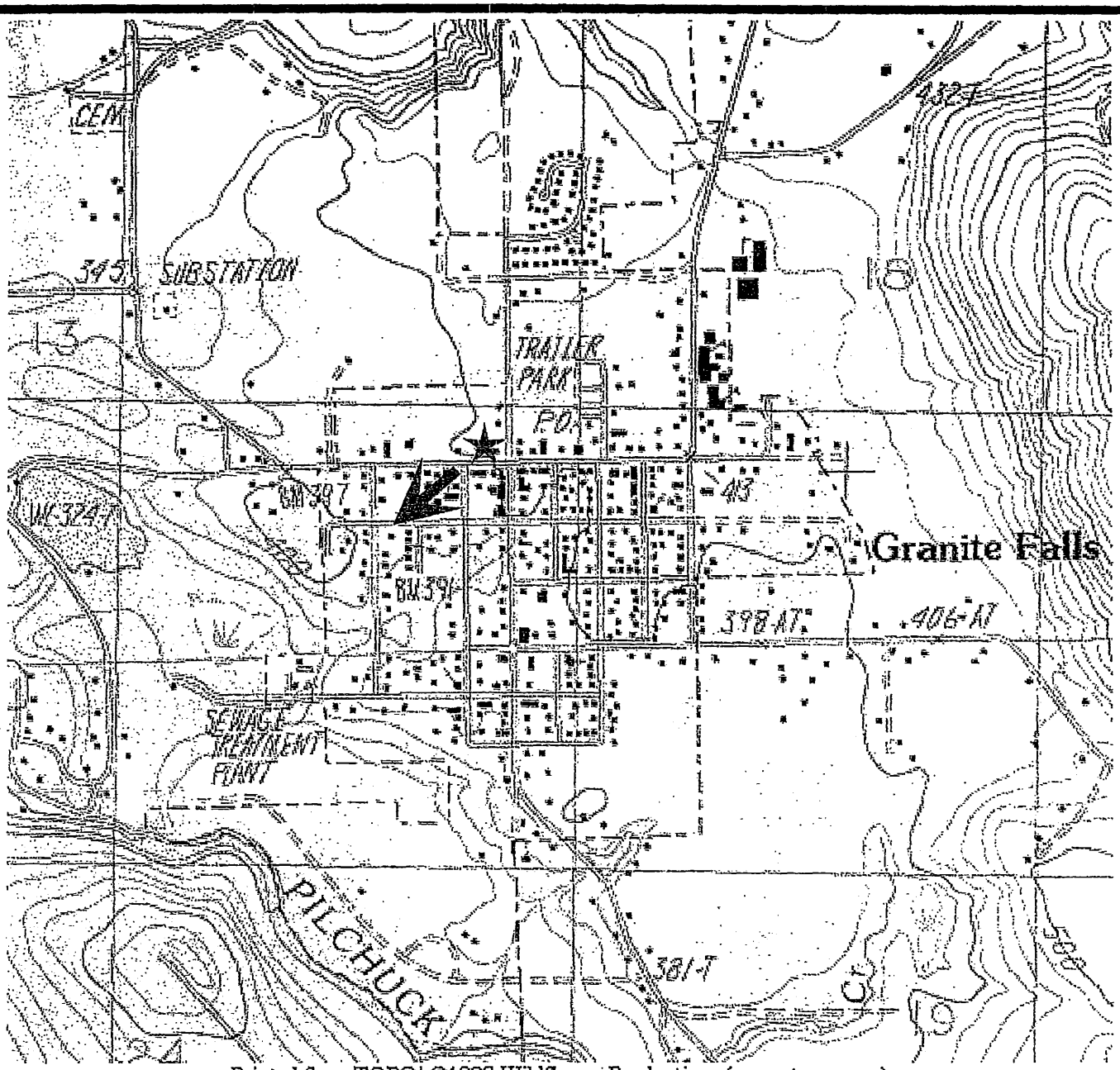

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★ **Subject Property**

Inferred direction of shallow groundwater flow, based upon the local topographical gradient.

N

Scale

1/2 Mile

0 — 1

Contour Interval = 20 Feet

ENVIRONMENTAL ASSOCIATES, INC.

1380 - 112th Avenue NE, Suite 300
Bellevue, Washington 98004

VICINITY / TOPOGRAPHIC MAP

Bulk-Fuel Facility
201 West Stanley Street
Granite Falls, Washington

Job Number:	*Date:*		*Plate:*
JN 23269-1	December 2003		1

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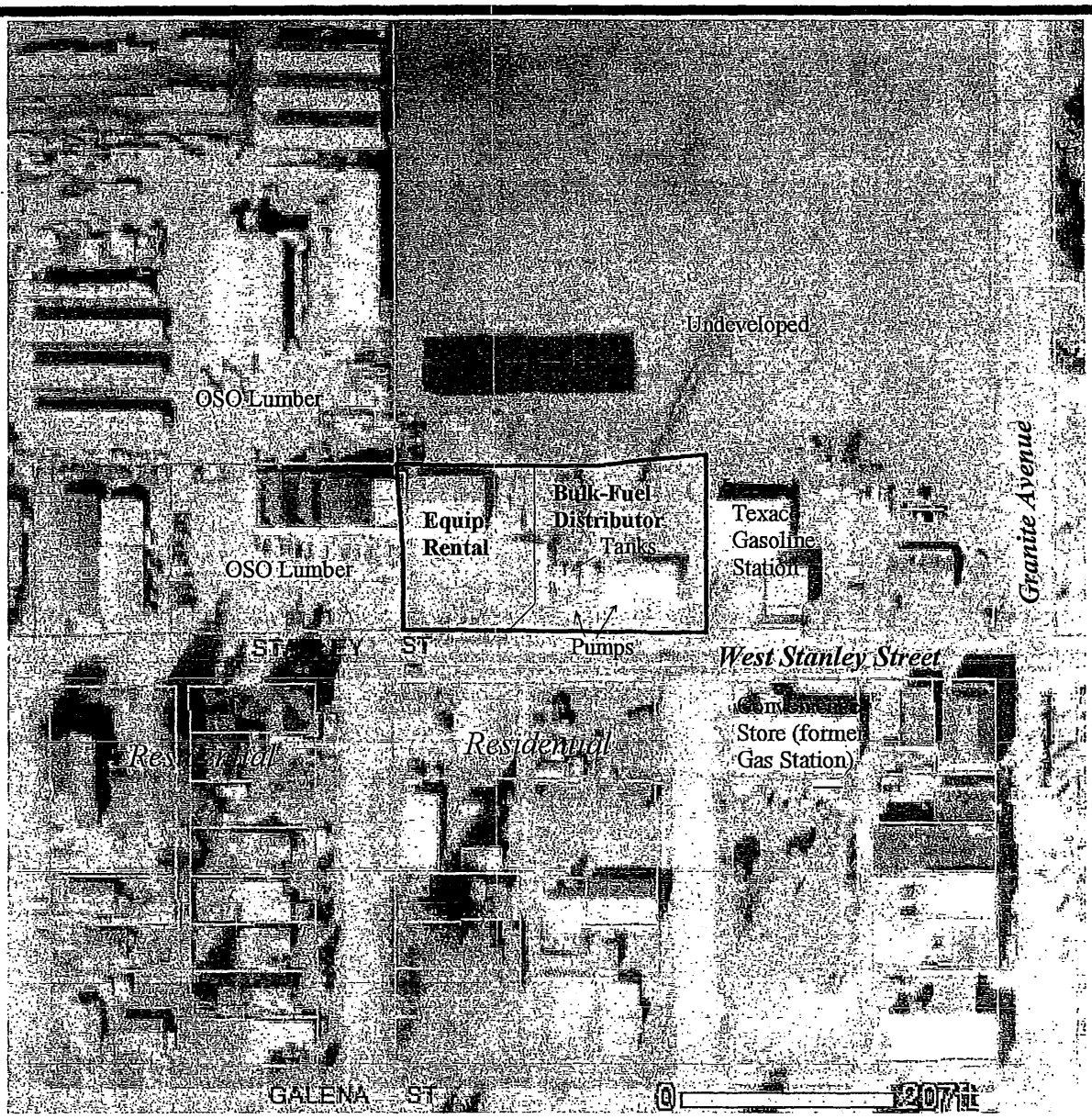

Shallow groundwater flow direction deduced by GeoEngineers in 1998.

Subject Property

N

ENVIRONMENTAL ASSOCIATES, INC.

1380 - 112th Avenue N.E., Ste. 300
Bellevue, Washington 98004

SITE PLAN

Bulk-Fuel Facility
201 West Stanley Street
Granite Falls, Washington

Job Number:	*Date:*		*Plate:*
JN 23269-1	December 2003		2

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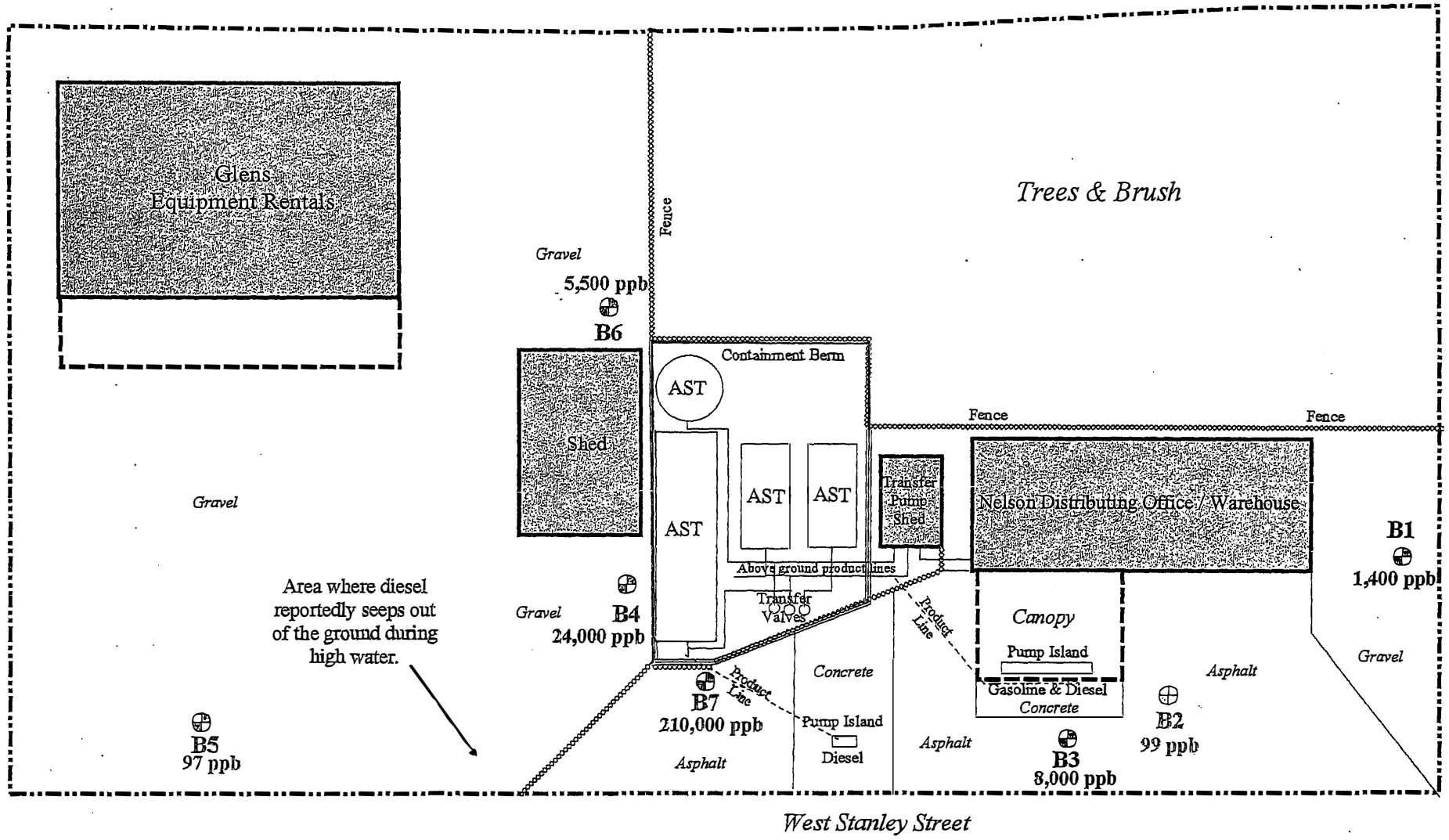

ENVIRONMENTAL ASSOCIATES, INC.

1380 - 112th Avenue NE, Suite 300
Bellevue, Washington 98004

Legend

Approximate soil boring locations. Green denotes locations where diesel concentrations in the groundwater were below the WDOE's Method-A target compliance levels. Red denotes concentrations above the compliance level of 500 ppb.

N

SITE PLAN-DETAILED

Bulk-Fuel Facility
201 West Stanley Street
Granite Falls, Washington

Job Number:	Date:	Scale:	Plate:
JN-23269-1	December 2003	1"=30'	3

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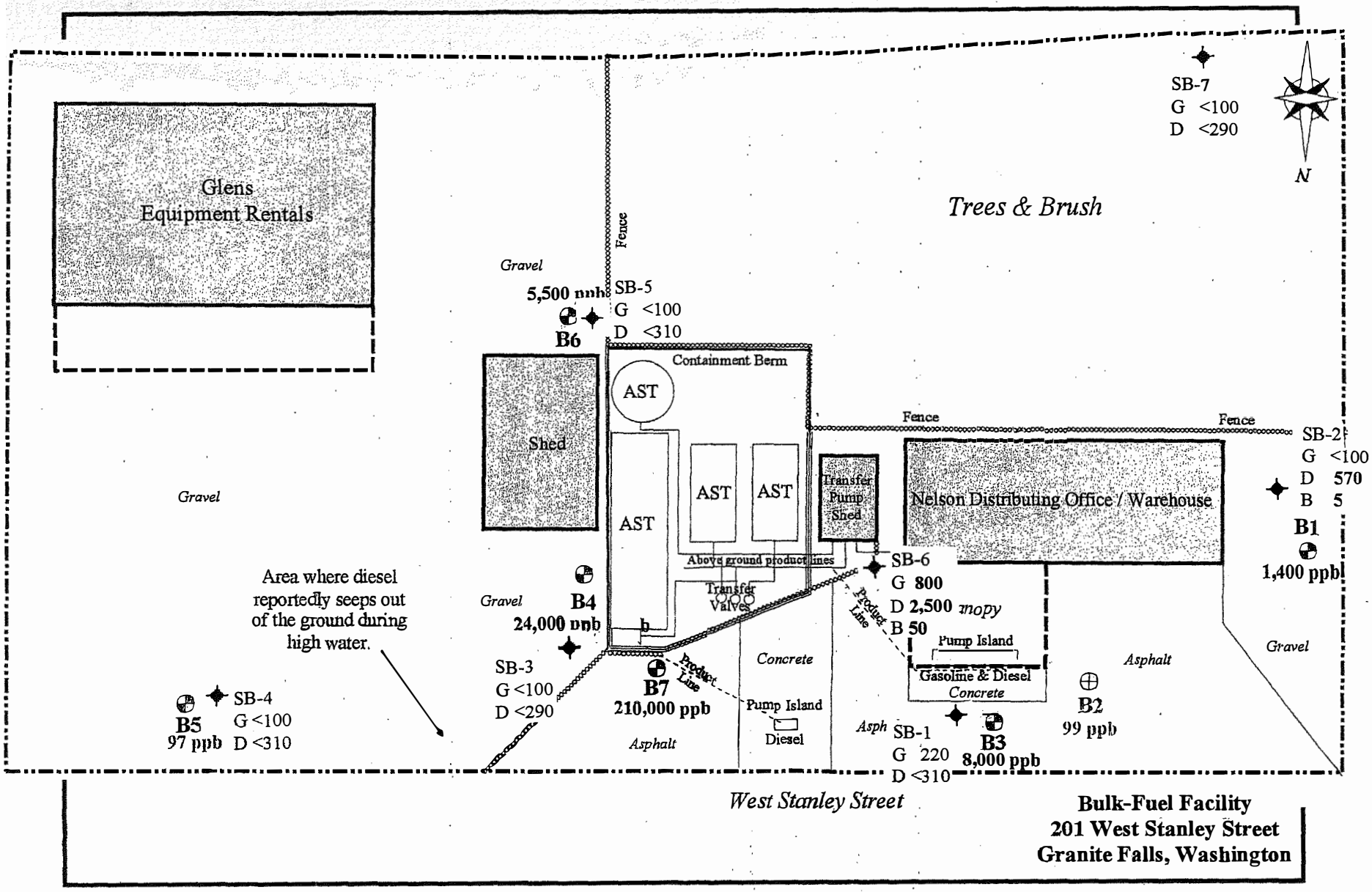

Bulk-Fuel Facility
201 West Stanley Street
Granite Falls, Washington

SD&C **Boring Location Map – Groundwater Analytical Data EA Associates 2003 / SD&C 2008** **Figure 4**

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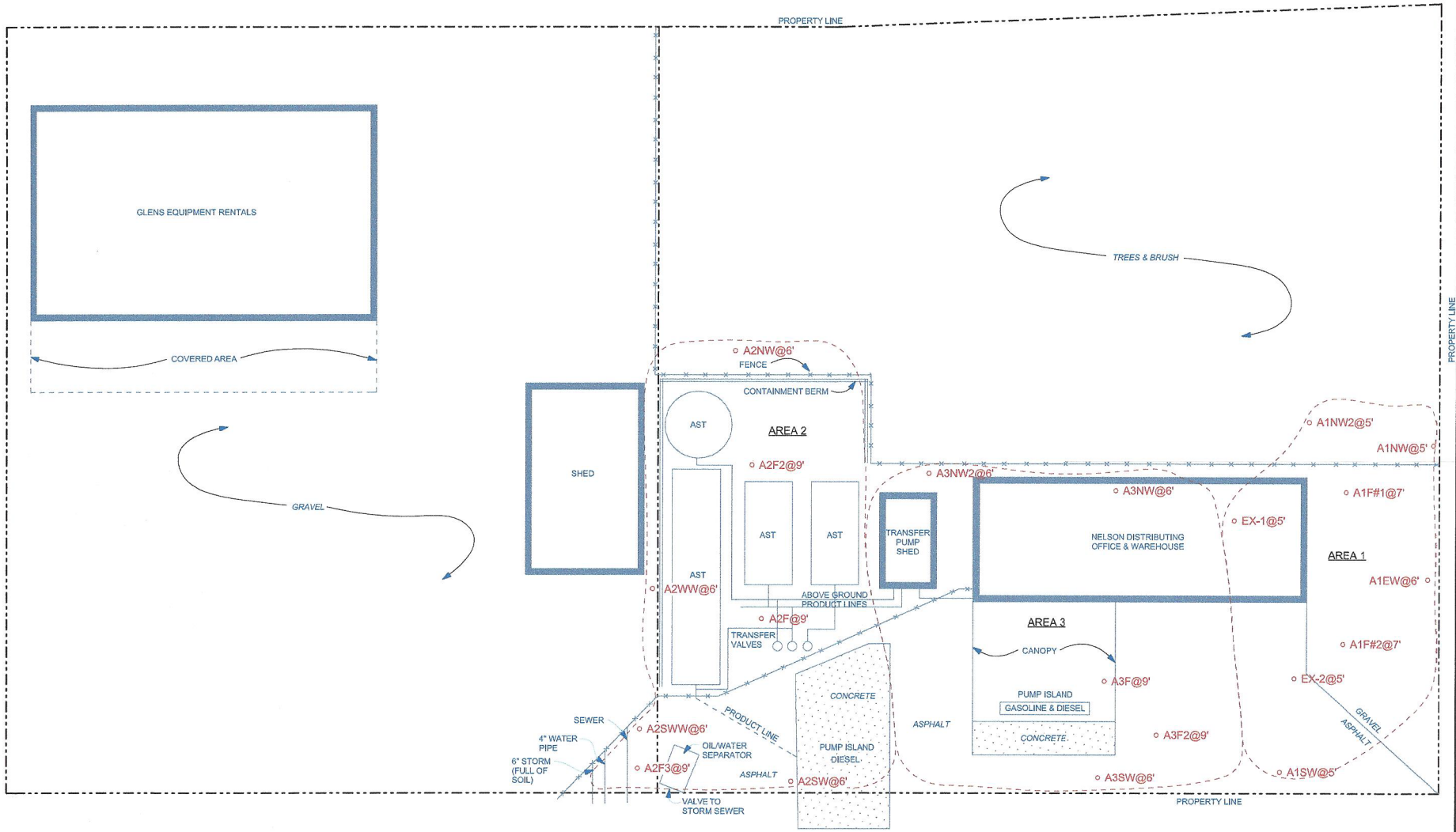

N

SITE PLAN
SCALE: 1" = 20'

0 10' 20' 40'

○ SD&C REMEDIATION SAMPLE LOCATIONS

Slotta Design & Consulting
P.O. Box 2071 Kirkland, WA 98083
(206) 459-5775

NELSON DISTRIBUTING
201 W. Stanley Street
Granite Falls, WA

SOIL ANALYTICAL RESULTS

2

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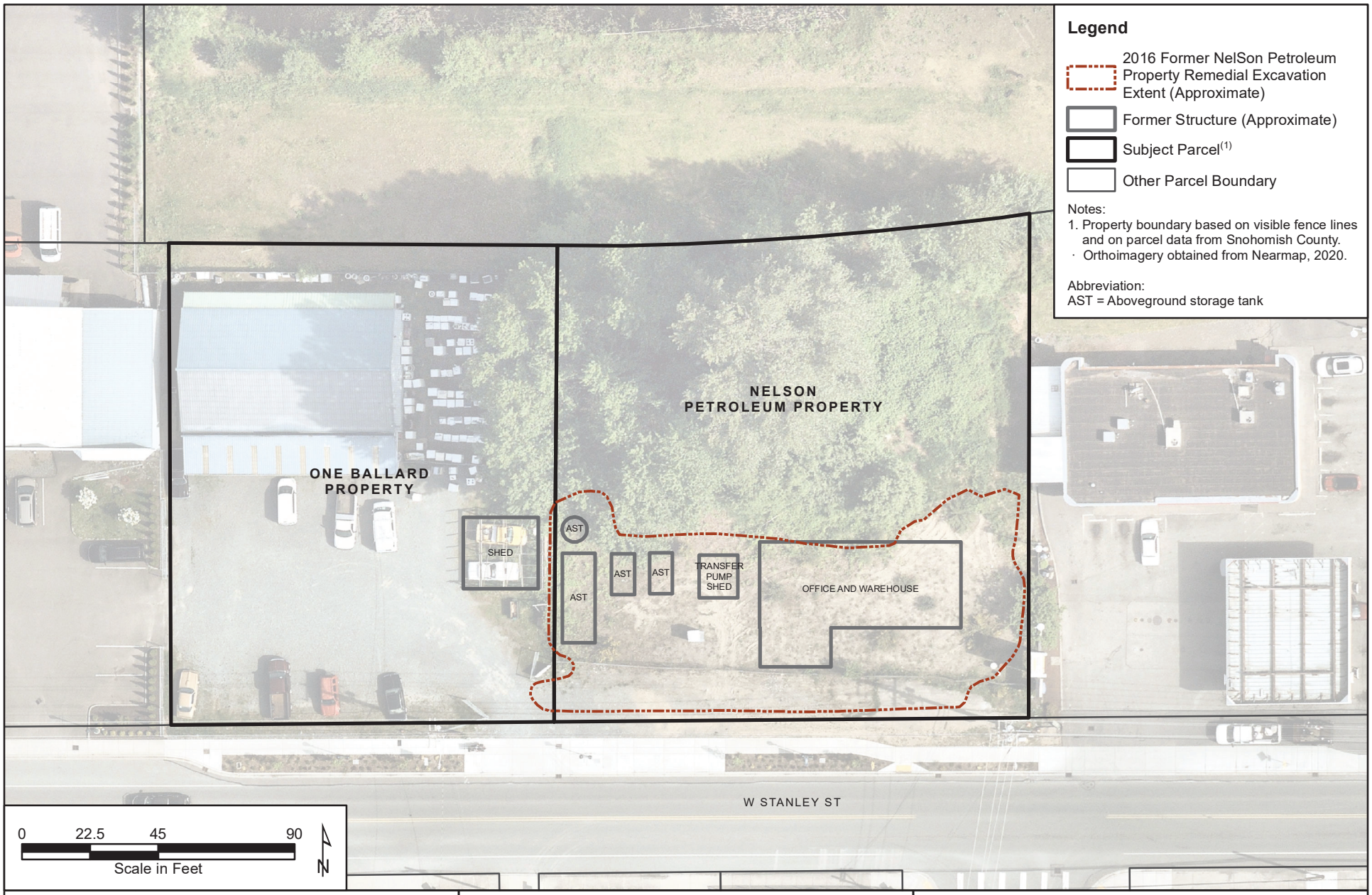

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One Ballard Property
Remedial Excavation Summary
NelSon Petroleum Property
Granite Falls, WA

Figure 1
Property Location Map

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1/21/2022

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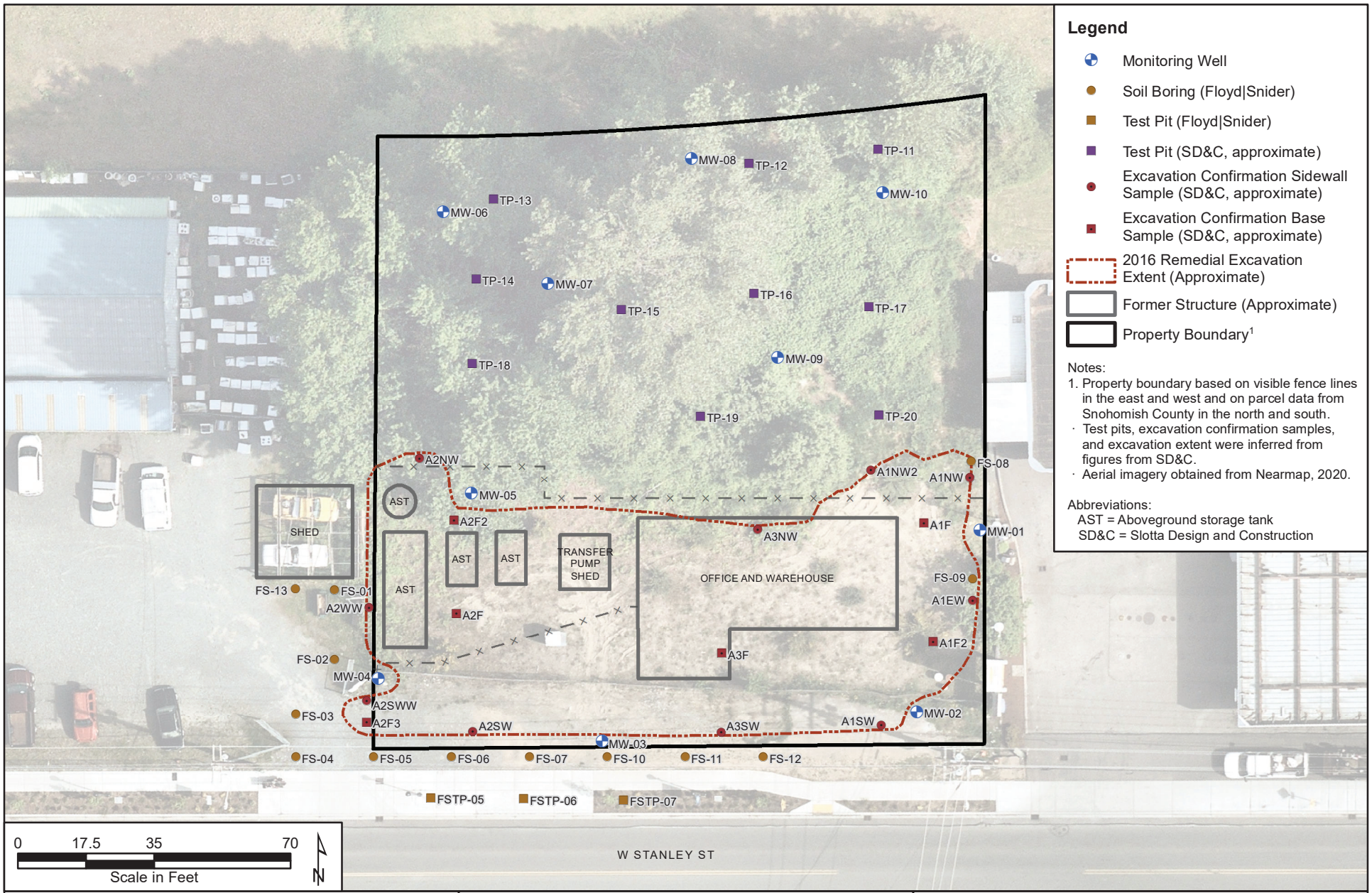

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Data Summary Memorandum
Former NelSon Petroleum Property
Granite Falls, WA

Figure 1
Property Features

I:\GIS\Projects\NelSon-Granite Falls\MXD\Data Summary Memorandum\Figure 1 Property Features.mxd
9/25/2020

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Legend

- Monitoring Well
- 2021 Confirmation Soil Sample
- 2016 Confirmation Soil Sample
- 2016 Confirmation Soil Sample (Removed)
- 2020 Direct Push Soil Sample
- 2020 Direct Push Soil Sample (Removed)
- 2019 Test Pit Soil Sample
- 2021 One Ballard Property Excavation Extent
- 2016 Former NelSon Petroleum Property Remedial Excavation Extent (Approximate)
- Subject Parcel(1)
- Former Structure (Approximate)

0 5 10 20
Scale in Feet

N

ONE BALLARD PROPERTY

NELSON PETROLEUM PROPERTY

A2NW		
Depth	Benzene	GRO
6–6	0.030 U	3.0 U

MW-05

AST

SHED

A2F2		
Depth	Benzene	GRO
9–9	0.030 U	4.9

AST

AST

AST

FS-01		
Depth	Benzene	GRO
5–6	0.020 U	**110**
6.5–7.5	**0.18**	5.0 U

FS-13		
Depth	Benzene	GRO
4.5–5.5	0.020 U	14

SIDE-01		
Depth	Benzene	GRO
5–5	0.020 U	5.0 U

A2WW		
Depth	Benzene	GRO
6–6	*0.060 U*	**110** (2)

A2F		
Depth	Benzene	GRO
9–9	0.030 U	3.0 U

BASE-01		
Depth	Benzene	GRO
7–7	0.020 U	5.0 U

FS-02		
Depth	Benzene	GRO
4–5	0.020 U	5.0 U

BASE-02		
Depth	Benzene	GRO
7.5–7.5	0.020 U	5.0 U

MW-04		
Depth	Benzene	GRO
3–3	*0.15 U*	**120** (2)

SIDE-02		
Depth	Benzene	GRO
5–5	0.020 U	19

A2SWW		
Depth	Benzene	GRO
6–6	**0.36**	**150** (2)

FS-03		
Depth	Benzene	GRO
4.5–5	0.020 U	5.0 U

A2F3		
Depth	Benzene	GRO
9–9	**0.49**	14

A2SW		
Depth	Benzene	GRO
6–6	*0.60 U*	**770** (2)

FS-04		
Depth	Benzene	GRO
2–3	**0.44**	**410**
4.5–5	0.020 U	5.0 U

FS-05		
Depth	Benzene	GRO
5–6	*0.20 U*	**550**
7–8	**0.16**	15

FS-06		
Depth	Benzene	GRO
4.5–5	0.020 UJ	**950**
7–8	0.020 U	11

FSTP-05		
Depth	Benzene	GRO
4–4	0.020 U	**170**

W STANLEY ST

Notes:
1. Property boundary based on visible fence lines in the east and west and on parcel data from Snohomish County in the north and south.
2. Sample contains highly weathered gasoline.

- Results shown in **RED BOLD** indicate a result that exceeds the MTCA Method A cleanup level for benzene (0.030 mg/kg) or GRO (30 mg/kg) *Italics* indicate a reporting limit that exceeds the applicable cleanup level.
- Depths are presented in feet bgs and benzene and GRO results are presented in mg/kg.
- Direct push soil sample depths are approximate due to sample compression.
- Measuring point for 2016 confirmation soil samples is presumed to be higher than current ground surface.
- Orthoimagery obtained from Nearmap, 2020.

Abbreviations:
AST = Aboveground storage tank
bgs = Below ground surface
GRO = Gasoline-range organics
MTCA = Model Toxics Control Act
mg/kg = Milligrams per kilogram

Qualifiers:
U = Analyte was not detected at the given reporting limit.
UJ = Analyte was not detected at the given reporting limit; reporting limit is considered an estimate.

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One Ballard Property Remedial Excavation Summary NelSon Petroleum Property Granite Falls, WA

Figure 2
Excavation and Confirmation Sample Summary

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1/21/2022

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Enclosure B

Basis for the Opinion: Documents List

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Documents List

1. Environmental Associates, Inc., *Preliminary Subsurface Excavation*, December 9, 2003
2. Slotta Design & Consulting (SD&C), *Phase I and Phase II Environmental Site Assessment*, April 3, 2008
3. SD&C, *Site Decommissioning and Demolition Work Plan,* May 1, 2015
4. SD&C, *Subsurface Investigation Report,* January 14, 2016
5. SD&C, *Site Demolition and Soil Excavation Report,* August 28, 2016
6. SD&C, *Quarterly Groundwater Monitoring Report (Q3 – 2016),* October 2, 2016
7. SD&C, *Subsurface Soil and Groundwater Investigation Report,* April 28, 2017
8. Floyd|Snider, *Additional Remedial Excavation Plan,* July 14, 2021
9. Floyd|Snider, *One Ballard Property Remedial Excavation Summary,* March 9, 2022
10. Floyd|Snider, *Field Report*, September 20, 2023

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Enclosure C

Previous Site Characterization

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Previous Site Characterization

In July of 2003, seven soil borings were installed at the Site. Five soil samples were collected from the soil borings, two of them composite samples, and analyzed for gasoline, diesel, oil, benzene, ethylbenzene, toluene, and xylene.

Gasoline was detected in all five soil samples, with one of five concentrations exceeding the MTCA Method A cleanup level. Diesel was detected in all five soil samples, with one of five concentrations exceeding the MTCA Method A cleanup level. Oil was detected in one of five soil samples, with a concentration below the MTCA Method A cleanup level. Benzene was detected in two of five soil samples, with both concentrations exceeding the MTCA Method A cleanup level. Ethylbenzene, toluene, and xylene were detected in two of five, one of five, and all five, soil samples respectively, with all concentrations below their respective MTCA Method A cleanup levels.

A grab groundwater sample was collected from each of the seven borings and analyzed for the same analytes. Gasoline was detected in one of seven samples, with a concentration below the MTCA Method A cleanup level. Diesel was detected in all seven samples, with five of seven concentrations exceeding the MTCA Method A cleanup level. Oil was detected in four of seven samples, with two of four concentrations exceeding the MTCA Method A cleanup level. Benzene was detected in three of seven samples, with all three concentrations exceeding the MTCA Method A cleanup level. Ethylbenzene was detected in two of seven samples, and xylene in one sample, with all three concentrations below their respective MTCA Method A cleanup levels. Toluene was not detected in any sample.

In February of 2008, seven additional soil borings were installed at the Site. One soil sample from each boring was analyzed for diesel and oil. Diesel was detected in six of seven samples, with one concentration exceeding the MTCA Method A cleanup level. Oil was detected in two of seven samples, with one sample exceeding the MTCA Method A cleanup level (the same sample that had an exceedance of diesel). The sample with the two exceedances was also analyzed for benzene, ethylbenzene, toluene, xylene, and total lead. Ethylbenzene, xylene, and total lead were detected in the sample, with all concentrations below their respective MTCA Method A standards. Benzene and toluene were not detected in the sample.

A groundwater sample was collected from each boring and analyzed for gasoline, diesel, oil, benzene, ethylbenzene, toluene, and xylene. Gasoline was detected in two of seven samples, with one concentration exceeding the MTCA Method A cleanup level. Diesel was detected in two of seven samples, with one concentration exceeding the MTCA Method A cleanup level (the same sample with the gasoline exceedance). Oil was not detected in any groundwater sample. The sample with the two exceedances also had detections of benzene, ethylbenzene,

toluene, and xylene, with the benzene concentration exceeding the MTCA Method A cleanup level. Other than those four detections, benzene was detected in one other sample, with a concentration equal to the MTCA Method A cleanup level. Benzene, ethylbenzene, toluene, and xylene were not detected in any of the other five groundwater samples.

In November of 2015, five groundwater monitoring wells were installed. Soil samples were collected from each boring and two other locations and analyzed for gasoline and diesel. Gasoline was detected in three of seven samples, with all concentrations exceeding the MTCA Method A cleanup level. Diesel was detected in three of seven soil samples, with all concentrations below the MTCA Method A cleanup level.

A groundwater sample was collected from each well and analyzed for gasoline, diesel, oil, benzene, ethylbenzene, toluene, and xylene. Gasoline was detected in one of five samples, with a concentration below the MTCA Method A cleanup level. Diesel was detected in all five samples, with all five concentrations exceeding the MTCA Method A cleanup level. Oil was not detected in any of the five samples. Benzene, ethylbenzene, toluene, and xylene were detected in one of five samples (MW-4), with the benzene concentration exceeding the MTCA Method A cleanup level and the ethylbenzene, toluene, and xylene concentrations below their respective MTCA Method A cleanup levels. Benzene, ethylbenzene, toluene, and xylene were not detected in the other four samples. (report not available).

In September of 2016, the same five monitoring wells were sampled, and the samples analyzed for the same analytes. Gasoline was detected in two of five samples, with both concentrations below the MTCA Method A cleanup level. Diesel was detected in three samples, with two of three concentrations exceeding the MTCA Method A cleanup level. Oil was detected in three of five samples, with two of three concentrations exceeding the MTCA Method A cleanup level. Benzene, ethylbenzene, toluene, and xylene were not detected in any sample.

In December of 2016, the same five monitoring wells were sampled, and the samples analyzed for the same analytes. Gasoline was detected in two of five samples, with both concentrations below the MTCA Method A cleanup level. Diesel was detected in three of five samples, with two of three concentrations exceeding the MTCA Method A cleanup level. Oil was detected in two of five samples, with one of two concentrations exceeding the MTCA Method A cleanup level. Benzene, ethylbenzene, toluene, and xylene were not detected in any sample.

In March of 2017, the same five monitoring wells were sampled, and the samples analyzed for the same analytes. Gasoline was detected in two of five samples, with both concentrations below the MTCA Method A cleanup level. Diesel was detected in three of five samples, with one of three concentrations exceeding the MTCA Method A cleanup level. Oil was detected in one of five samples, with a concentration below the MTCA Method A cleanup level. Benzene, ethylbenzene, toluene, and xylene were not detected in any sample.

Ten test pits were installed, and ten soil samples and ten groundwater grab samples were collected. The soil samples and the grab groundwater samples were analyzed for gasoline, diesel, oil, benzene, ethylbenzene, toluene, and xylene.

Gasoline, benzene, ethylbenzene, toluene, and xylene were not detected in any soil sample. Diesel was detected in four of ten soil samples, with all concentrations below the MTCA Method A cleanup level. Oil was detected in the same four soil samples, with all concentrations below the MTCA Method A cleanup level.

Gasoline, benzene, ethylbenzene, toluene, and xylene were not detected in any of the grab groundwater samples. Diesel and oil were detected in all ten grab groundwater samples, with the same eight of ten samples having exceedances of the respective MTCA Method A cleanup levels for both analytes.

Between July of 2017 and September of 2018, the same five monitoring wells were sampled twenty-five times and the samples analyzed for the same analytes. Gasoline was detected in five of twenty-five samples, with all concentrations below the MTCA Method A cleanup level. Diesel was detected in fifteen of twenty-five samples (MW-3, MW-4, and MW-5), with two of fifteen concentrations exceeding the MTCA Method A cleanup level. Oil was detected in five of twenty-five samples (MW-4 and MW-5), with two of five concentrations exceeding the MTCA Method A cleanup level. Benzene, ethylbenzene, toluene, and xylene were not detected in any of the twenty-five samples.

In December of 2018 and April of 2019, the same five monitoring wells were sampled twice and the samples analyzed for the same analytes. Gasoline was not detected in any of the ten samples. Diesel was detected in six of ten samples (MW-3, MW-4, and MW-5), with one of six concentrations exceeding the MTCA Method A cleanup level. Oil was detected in one of ten samples (MW-5), with a concentration exceeding the MTCA Method A cleanup level. The laboratory noted that all of the diesel detections and the oil detection did not match the chromatographic standard. Re-analysis of the well with diesel and oil exceedances (MW-5) following a silica gel cleanup found both diesel and oil concentrations to be non-detectable. Benzene, ethylbenzene, toluene, and xylene were not detected in any of the ten samples.

In August of 2019, three test pits were excavated and one soil sample from each test pit was analyzed for gasoline, diesel, oil, benzene, ethylbenzene, toluene, and xylene. Gasoline and diesel were detected in all three soil samples, with all six concentrations exceeding the respective MTCA Method A standards. Oil was detected in one of three samples. The laboratory noted that the chromatographic pattern did not match the standard. Benzene was not detected in any of the three samples. Ethylbenzene and xylene were detected in all three samples, with all six concentrations below their respective MTCA Method A cleanup levels. Toluene was detected in one of three samples, with a concentration below the MTCA Method A cleanup level.