FEASIBILITY STUDY AND CLEANUP ACTION PLAN

Express Storage River Road
7602 and 7702 River Road East
Puyallup, Washington

Farallon PN: 2220-008

February 4, 2025

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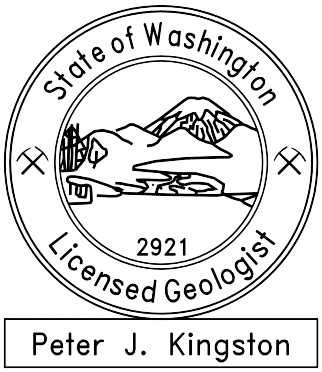

For:
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ACRONYMS AND ABBREVIATIONS

bgs	below ground surface
BTEX	benzene, toluene, ethylbenzene, and total xylenes
DRO	diesel-range organics
EPA	U.S. Environmental Protection Agency
Farallon	Farallon Consulting, L.L.C.
GRO	gasoline-range organics
LNAPL	light nonaqueous-phase liquid
µg/l	micrograms per liter
PAH	polynuclear aromatic hydrocarbon
QA/QC	quality assurance/quality control
RRO	residual-range organics

1.0 INTRODUCTION

Farallon Consulting, L.L.C. (Farallon) has prepared this Feasibility Study and Cleanup Action Plan (FS/CAP) on behalf of 7702 River Road Parcel A Owner, LLC; 7702 River Road Parcel B Owner, LLC; and 7702 River Road Parcel C Owner, LLC for the property at 7602 and 7702 River Road East in Puyallup, Washington (herein referred to as the Property) (Figure 1). This FS/CAP was prepared in accordance with the Washington State Model Toxics Control Act Cleanup Regulation (MTCA), as established in Chapter 173-340 of the Washington Administrative Code (WAC 173-340).

Current operations at the Property include automotive sales and public self-storage. Historical operations included an unpermitted wood waste landfill, known as the Corliss Wood Waste Landfill, which formerly operated on the Property from approximately May 1974 through November 1976. In 1974, the wood waste landfill caught fire and local agencies directed wood waste landfill activities to cease.

A remedial investigation was conducted by Farallon and others in multiple phases between 2016 and 2024 to evaluate whether current and/or historical operations resulted in the release of hazardous substances and to adequately characterize those hazardous substances. Based on the results of the remedial investigation, dissolved arsenic was the only hazardous substance detected at concentrations exceeding the MTCA cleanup level in groundwater. The Site, as defined by MTCA, comprises the area dissolved arsenic has come to be located in groundwater at concentrations exceeding MTCA cleanup levels. The Site currently is enrolled in the Washington State Department of Ecology (Ecology) Expedited Voluntary Cleanup Program (VCP) under VCP Project ID XS0018.

This report includes a summary of remedial investigation activities conducted on the Property by Farallon and others, an evaluation of cleanup action alternatives, a description of the planned cleanup action for the Site, and a request for a restricted No Further Action (NFA) determination from Ecology.

1.1 PURPOSE

The purpose of this FS/CAP is to summarize the remedial investigation completed to characterize the hazardous substances at the Site, identify cleanup action alternatives for the Site, select a preferred cleanup action for the Site, document the selected cleanup action for the Site, and to specify the cleanup standards and other requirements the cleanup action must meet. The objective of the selected cleanup action alternative is to

protect human health and the environment and meet MTCA requirements for Ecology to issue a restricted NFA determination for the Site.

1.2 REPORT ORGANIZATION

The report has been organized into the following sections:

Section 2, Property Description and Background, provides a description of the Property and relevant background information, including current and historical uses of the Property and surrounding area and a description of the local geology and hydrogeology.

Section 3, Remedial Investigation and Conceptual Site Model, provides a summary of the remedial investigation activities and results.

Section 4, Cleanup Standards, provides a discussion of the applicable cleanup levels, screening levels, points of compliance, and laws for the cleanup action.

Section 5, Feasibility Study, provides screening of potentially feasible remedial technologies, development and evaluation of a range of cleanup action alternatives, and the basis for selecting the preferred cleanup action alternative.

Section 6, Cleanup Action Plan, provides a description of the proposed cleanup action and a discussion of compliance monitoring.

Section 7, Bibliography, provides a list of the documents cited in this report.

Section 8, Limitations, provides Farallon's standard limitations associated with this report.

2.0 PROPERTY DESCRIPTION AND BACKGROUND

This section provides a description of the Property and relevant background information, including current and historical uses of the Property and surrounding area and a description of the local geology and hydrogeology. Additional information on the Property is provided in the RI Report (Farallon 2024).

2.1 PROPERTY DESCRIPTION AND HISTORICAL USE

The Property consists of Pierce County Parcel Nos. 0420202079, 0420202080, and 0420202081, which total 7.67 acres of land developed with two general areas of operation (Figure 2). The northwestern portion of the Property, comprising Pierce County Parcel No. 0420202079, is developed with In-and-Out Auto Sales, a used car sales lot, which includes a one-story 720-square-foot office building (Sales Building) and a one-story 1,680-square-foot garage building (Garage Building), each constructed in 1968. The Sales Building is used for office purposes and the Garage Building is used for automotive maintenance and minor painting operations.

The central and southern portions of the Property, comprising Pierce County Parcel Nos. 0420202080 and 0420202081, are developed with a public self-storage facility known as Puyallup River Self Storage that includes approximately 10 buildings ranging in size from 800 to 2,400 square feet constructed in 1988 (Storage Buildings), and a manufactured home used as an office (Mobile Home) with an attached 1,632-square-foot canopy constructed in 1988 on the eastern portion of the Property. The Mobile Home is vacant and was most recently used for office purposes. The remaining portions of the public self-storage storage facility consists of unpaved parking and storage areas.

The northwestern portion of the Property was developed in 1968 with the Sales and Garage Buildings. The Storage Buildings and Mobile Home were constructed in 1988. A historical unpermitted wood waste landfill, known as the Corliss Wood Waste Landfill, formerly operated on the Property from approximately May 1974 through November 1976. In 1974, the wood waste landfill caught fire and local agencies directed wood waste landfill activities to cease. The approximate extent of the former wood waste landfill is shown on Figure 2.

2.2 FUTURE PROPERTY USE

Currently there are no redevelopment plans for the Property. It will continue to be used as a storage lot with a used car sales lot on the northwestern portion of the Property. Any future

development would be subject to local land use codes and regulations. Specifically, local land use codes and regulations from the Tacoma-Pierce County Health Department (TPCHD) and/or City of Puyallup would determine whether the future use of the Property requires methane mitigation. Appendix A provides a Methane Mitigation Plan that could be implemented to mitigate methane soil gas vapor intrusion into any future buildings to protect human health and the environment.

2.3 GEOLOGY AND HYDROGEOLOGY

The Property and surrounding area are situated in the Puget Lowland physiographic province, which is a Quaternary-deposited, broad, low-lying trough situated between the Cascade Mountain range to the east, the Olympic Mountain range to the northwest, and Willapa Hills to the southwest. The geology in the vicinity of the Property consists of alluvial deposits of loose, stratified fluvial silt, sand, and gravel associated with the Puyallup River valley.

During the remedial investigation conducted at the Property, untreated wood waste was encountered at a maximum depth of 16 feet below ground surface (bgs) in the southern portion of the Property, and a depth of 11.5 feet bgs in the northern portion of the Property. The untreated wood waste consisted of untreated lumber, limbs, logs, and wood shavings. The wood waste was underlain by fine to coarse sands with silt and gravel observed to the maximum explored depth of 25 feet bgs. Wood waste was not encountered in the northwestern portion of the Property beneath the used car sales lot.

Groundwater was encountered during drilling at depths ranging from approximately 5 to 16 feet bgs. The depth to groundwater measured in monitoring wells during monitoring events ranged from 11.12 to 17.37 feet bgs (Table 1). Based on groundwater elevations calculated using synoptic measurements collected during groundwater monitoring events conducted in 2023 and 2024, the interpreted groundwater flow direction is to the north toward the Puyallup River (Figures 3 through 5).

2.4 PUBLIC WATER SUPPLY

The Property is in the vicinity of three Group A public water systems, including the Rivercrest Mobile Park located approximately 150 feet west of the Property, Riverside Villa located approximately 0.23 mile northwest of the Property, and Eggimann 664 located approximately 0.3 mile northeast and across the Puyallup River from the Property.

The Rivercrest Mobile Park water system is inactive as of July 2023. The water system was formerly comprised of two wells, Well #1 and Well #2, which were installed to depths of 101 and 99 feet bgs, respectively. Well logs were not available for the wells. However, based on the total depth of the wells, it is assumed that the wells are screened significantly deeper than the Property wells. According to the water quality results by the Washington State Department of Health readily available online, arsenic was reported non-detect at the laboratory reporting limit in all water samples collected from the water supply. Water samples have not been analyzed for total petroleum hydrocarbons.

The Riverside Villa water system is comprised of one well installed to a depth of 265 feet bgs. According to the well log, groundwater was encountered at a depth of 235 feet bgs and the well is artesian, which indicates that the aquifer is confined. According to the water quality results by the Washington State Department of Health readily available online, arsenic was reported non-detect at the laboratory reporting limit or less than MTCA cleanup levels in all water samples collected from the water supply. Water samples have not been analyzed for total petroleum hydrocarbons.

The Eggimann 664 water system is comprised of one well installed to a depth of 283 feet bgs. According to the well log, groundwater was encountered at a depth of 260 feet bgs and the well is artesian, which indicates that the aquifer is confined. According to the water quality results by the Washington State Department of Health readily available online, arsenic was reported non-detect at the laboratory reporting limit in all water samples collected from the water supply. Water samples have not been analyzed for total petroleum hydrocarbons.

Based on this information, the three Group A public water systems in the vicinity of the Property are not impacted. Only two of the water systems are still active. Both of those active water systems draw groundwater from a deep aquifer. In addition, arsenic has not been detected in any of the samples analyzed from the water systems.

3.0 REMEDIAL INVESTIGATION AND CONCEPTUAL SITE MODEL

The remedial investigation was conducted in accordance with the provisions of WAC 173-340-350 to adequately characterize hazardous substances at the Site, including the distribution of hazardous substances and the threat they pose to human health and the environment. The remedial investigation was conducted in several phases between 2016 and 2024, with hydrogeological and chemical analytical data from the early phases used to refine the scope of later phases of the remedial investigation.

3.1 REMEDIAL INVESTIGATION FIELD ACTIVITIES

During a 2016 geotechnical investigation, test pits TP-1 through TP-4 were advanced to depths ranging from 6 to 11.5 feet bgs (Figure 2). Fill material consisting of lumber, limbs, logs, wood shavings, and minor amounts of plastic and metal was encountered to the maximum depth explored; however, no environmental samples were collected.

In 2022, a Phase I Environmental Site Assessment (Phase I ESA) and Phase II ESA were conducted at the Property, which indicated constituents of potential concern were not detected at concentrations exceeding MTCA Method A cleanup levels in soil and reconnaissance groundwater samples analyzed; however, the 2022 investigations did not investigate potential releases of hazardous substances associated with the historical wood waste landfill.

Between August 2023 and October 2024, Farallon conducted further investigation at the Property, which included advancing a total of nine borings, collecting soil and reconnaissance groundwater samples, and installing five monitoring wells. Multiple sampling points were used to evaluate methane concentrations, including temporary soil gas monitoring points, monitoring wells, and a soil gas vapor pin. Farallon conducted groundwater and methane monitoring events in September 2023, February 2024, May 2024, and October 2024.

3.2 REMEDIAL INVESTIGATION RESULTS

Soil samples were analyzed from soil that was present beneath the wood waste. Hazardous substances, including total petroleum hydrocarbons as diesel-range, oil-range, and gasoline-range organics (DRO, ORO, GRO); benzene, toluene, ethylbenzene, and xylenes (BTEX); volatile organic compounds (VOCs), polycyclic aromatic hydrocarbons (PAHs), and metals, were less than the MTCA Method A cleanup levels in the soil samples analyzed (Figures 6 and 7; Tables 2 through 5).

DRO, ORO, and arsenic were the only hazardous substances detected at concentrations exceeding the MTCA cleanup levels in groundwater samples analyzed (Figures 8 and 9; Tables 6 and 8). GRO, VOCs, PAHs, and the remaining metals were less than the MTCA Method A cleanup levels in groundwater samples analyzed. During the most recent groundwater monitoring event in October 2024 and previous events, dissolved arsenic was detected at concentrations exceeding the MTCA cleanup level in the groundwater samples collected from monitoring wells FMW-01 and FMW-02 (Figure 9; Table 8). Dissolved arsenic concentrations were less than the MTCA cleanup level in the remaining groundwater samples analyzed.

Groundwater samples were analyzed with and without silica gel cleanup to evaluate whether DRO and ORO detections were a result of organic interference due to the presence of untreated wood waste present beneath the Property. During the most recent groundwater monitoring event in October 2024, DRO and/or ORO were detected at concentrations exceeding the MTCA Method A cleanup level in the groundwater samples collected from monitoring well FMW-03 when analyzed without silica gel cleanup (Figure 8; Table 6). However, DRO and ORO were reported non-detect at the laboratory practical quantitation limit following silica gel cleanup in all groundwater samples analyzed (Figure 8; Table 7). Based on these data, there are no detectable concentrations of petroleum hydrocarbons and the DRO and ORO concentrations are polar organics from the untreated wood waste and naturally occurring organics.

Methane concentrations have exceeded the lower explosive limit (LEL) in seven of the nine soil gas sampling points (Figure 10; Table 9). The highest concentration of methane was 68.2 percent in soil gas sampling point FMW-04 on the western portion of the Property. All of the detections were in soil gas sampling points located within untreated wood waste in the former landfill. Based on these data, the untreated wood waste was determined to be producing methane gas.

Methane was not detected in vapor pin VP-1 located in the Garage Building. This demonstrated that the methane has not migrated from the former landfill into the occupied buildings on the Property.

3.3 MEDIA AND CONSTITUENTS OF CONCERN

Based on the results of the remedial investigation, arsenic in groundwater is the primary constituent of concern (COC) for the Site.

Polar organics have been detected in groundwater at concentrations exceeding screening levels. The detected concentrations of polar organics are entirely the result of organic material, including anthropogenic wood waste, and not the degradation of petroleum hydrocarbons. Because the anthropogenic wood waste is causing polar organics to exceed screening levels in a localized area of groundwater at the Site, polar organics are considered to be a constituent of potential concern for the Site. However, polar organics are not considered to be a hazardous substance.

Since methane gas is not a hazardous substance, it does not qualify as a COC for the Site. However, based on methane concentrations detected at the Property, methane mitigation is likely necessary if future development occurs on the Property.

3.4 NATURE AND EXTENT OF CONTAMINATION

The results of the remedial investigation confirm that the former untreated wood waste landfill on the Property is the source of the contamination at the Site. The contamination consists of arsenic and polar organics in groundwater and methane in soil gas. Decomposing organic materials creates anaerobic conditions that can result in mobilization of naturally occurring arsenic, accumulation of polar organics, and production of methane. The approximate extent of the former wood waste landfill is depicted on Figure 2 and includes the majority of the central and southern portions of the Property, comprising Pierce County Parcel Nos. 0420202080 and 0420202081.

The MTCA cleanup level for arsenic was the natural background concentration for arsenic in the Puget Sound lowlands of 8 micrograms per liter (µg/L). Arsenic was detected at concentrations exceeding the MTCA cleanup level in the central and southern portions of the Property (Figure 9; Table 8). The screening level for anthropogenic polar organics in the absence of petroleum hydrocarbons is 700 µg/L. Polar organics were detected in a single groundwater sample collected from the central portion of the Property during the most recent groundwater monitoring event in October 2024.

Since methane gas is not a hazardous substance and does not have a MTCA cleanup level, concentrations of methane were compared with the LEL, which is 5 percent. Methane concentrations have exceeded the LEL in seven of the nine soil gas sampling points. The highest concentration of methane was 68.2 percent in soil gas sampling point FMW-04 on the western portion of the Property (Figure 10; Table 9). All of the detections were in soil gas sampling points located within untreated wood waste in the former landfill. Based on these data, the untreated wood waste was determined to be producing methane gas. Methane

was not detected in vapor pin VP-1 located in the Garage Building. This demonstrated that the methane has not migrated from the former landfill into the occupied buildings on the Property.

4.0 CLEANUP STANDARDS

As defined in WAC 173-340-700, cleanup standards include establishing cleanup levels and the points of compliance at which the cleanup levels are to be attained for the Site. The cleanup standards for the Site have been established in accordance with WAC 173-340-700 through 173-340-760 to be protective of human health and the environment.

The cleanup action alternatives will comply with the cleanup standards to support issuance of an NFA determination from Ecology.

4.1 CLEANUP LEVELS

The current MTCA Method A cleanup level for arsenic in groundwater is 5 µg/L, which is within the range of the Washington State natural background ranging from 5 to 15 µg/L. The natural background concentration for arsenic in the Puget Sound lowlands is 8 µg/L, which has been selected as the cleanup level for groundwater at the Site.

4.2 SCREENING LEVELS

The screening level for anthropogenic polar organics in the absence of petroleum hydrocarbons is 700 µg/L.

4.3 POINTS OF COMPLIANCE

The points of compliance are the locations at which cleanup levels for the COCs must be attained to meet the requirements of MTCA. In accordance with WAC 173-340-720(8), the point of compliance for groundwater is defined as the uppermost level of the saturated zone extending vertically to the lowest depth at the Site that potentially could be impacted by COCs.

4.4 APPLICABLE LOCAL, STATE, AND FEDERAL LAWS

The cleanup action must comply with applicable local, state, and federal laws (WAC 173-340-710). The potentially applicable local, state, and federal laws for the cleanup action are provided below.

- Model Toxics Control Act, Chapter 70A.305 of the Revised Code of Washington (Chapter 70A.305 RCW);
- Washington State Solid Waste Management Laws and Regulations (Chapter 70.95 RCW; Chapter 173-351 WAC; and Chapter 173-304 WAC);

- The Water Quality Standards for Groundwaters of the State of Washington (Chapter 173-200 WAC);
- Water Quality Standards for Surface Waters of the State of Washington (Chapter 173-201A WAC);
- Accreditation of Environmental Laboratories (Chapter 173-50 WAC);
- The Occupational Safety and Health Act (Part 1910 of Title 29 of the Code of Federal Regulations [29 CFR 1910] and Chapter 296-62 WAC);
- The State Environmental Policy Act (Chapter 43.21 RCW; Chapter 197-11 WAC; and Chapter 173-802 WAC);
- Maximum Contaminant Levels, National Primary Drinking Water Regulations (WAC 246-290-310 and 46 CFR 141);
- Safety Standards for Construction Work (Chapter 296-155 WAC);
- Minimum Standards for Construction and Maintenance of Wells (Chapter 173-160 WAC); and
- Applicable local permits and ordinances indicated by TPCHD and/or City of Puyallup.

5.0 FEASIBILITY STUDY

The purpose of the feasibility study is to develop and evaluate cleanup action alternatives to facilitate the selection of a preferred cleanup action at the Site in accordance with WAC 173-340-351. The feasibility study is intended to provide sufficient information to select a preferred cleanup action alternative for the Site.

The feasibility study includes screening of potentially feasible remedial technologies and development of a range of cleanup action alternatives that achieve the cleanup standards identified in Section 4.0 in a reasonable restoration time frame. The cleanup action alternatives are evaluated with respect to cleanup action requirements and expectations set forth in MTCA. The feasibility study evaluates the cleanup action alternatives and identifies those that were not effective, not technically possible, or whose costs were disproportionate to benefits, and provides the basis for selecting a preferred cleanup action alternative.

The feasibility study evaluates three cleanup action alternatives in accordance with WAC 173-340-360. The feasibility study includes preparation of a disproportionate cost analysis (DCA) in accordance with WAC 173-340-360(5)(c)(iv). The DCA uses a semi-quantitative procedure to compare the cost of implementation against the environmental benefit to be achieved, and to identify which cleanup action alternative is most permanent and practicable under MTCA.

The preferred cleanup action alternative selected in the feasibility study is considered to present the highest degree of permanence and protectiveness considering current and potential future Site conditions to the maximum extent practicable.

5.1 CLEANUP ACTION REQUIREMENTS AND GOALS

As part of the feasibility study, Farallon evaluated the interim actions completed at the Site with respect to the cleanup requirements set forth in MTCA. A cleanup action must satisfy the following general requirements, as specified in WAC 173-340-360(3)(a):

- Protect human health and the environment, including likely vulnerable populations and overburdened communities;
- Comply with cleanup standards;
- Comply with applicable state and federal laws;
- Prevent or minimize present and future releases and migration of hazardous substances in the environment;

- Provide resilience to climate change impacts that have a high likelihood of occurring and severely compromising its long-term effectiveness;
- Provide for compliance monitoring;
- Not rely primarily on dilution and dispersion unless the incremental costs of any active remedial measures over the costs of dilution and dispersion grossly exceed the incremental degree of benefits;
- Provide for a reasonable restoration time frame;
- Use permanent solutions to the maximum extent practicable; and
- Consider public concerns.

In addition to the general requirements listed above, MTCA requires that cleanup action alternatives be evaluated for action-specific requirements (WAC 173-340-360(3)(b)), media-specific requirements (WAC 173-340-360(3)(c)), and public concerns and tribal rights and interests (WAC 173-340-360(3)(d)).

Site-specific cleanup action goals were also identified in accordance with WAC 173-340-351(6)(a). The cleanup action goals listed below provide additional framework for developing and evaluating remedial technologies and cleanup action alternatives.

- Achieve cleanup standards using a permanent solution as defined in WAC 173-340-200 that meets MTCA requirements for cleanup actions per WAC 173-340-360 and WAC 173-340-370;
- Eliminate the exposure pathways for COCs in groundwater;
- Select a permanent cleanup action; and
- Implement a cleanup action alternative that allows for continued land use.

5.2 INITIAL SCREENING OF CLEANUP ACTION COMPONENTS

Farallon conducted an initial screening of treatment technologies, containment actions, removal actions, engineered controls, institutional controls, and other types of remedial actions that could become components of cleanup action alternatives to be evaluated in the feasibility study. The remedial action approaches, either solely or combined, were evaluated with respect to the cleanup action goals and expectations. The following remedial action

approaches were identified for further evaluation as a cleanup action alternative, or as a component of a cleanup action alternative.

5.2.1 Excavation and Disposal

Under an excavation-based remediation approach, wood waste would be addressed by physically removing the material and replacing it with suitable imported material placed according to geotechnical specifications required for future Site use. The wood waste would then be transported from the Site for disposal at a clean wood waste disposal facility.

Excavation employs standard construction practices and readily available construction and earthmoving equipment. Excavation and disposal of wood waste at an appropriate disposal facility is an effective approach to reducing risk to human health and the environment. The wood waste is removed from the Site (i.e., an uncontrolled condition) and either reused to make compost or placed in a controlled condition (i.e., regulated disposal facility) where it will produce fewer adverse environmental impacts. Typically, the regulated disposal facility is an engineered landfill that features low-permeability liners, leachate collection systems, and landfill gas collection system to prevent landfill gas (i.e., methane) from impacting human health and the environment.

This remediation approach was retained for additional evaluation as it represents a permanent cleanup action alternative for wood waste at the Site.

5.2.2 Solidification

Solidification stabilizes in-situ wood waste and reduces the risk to human health and the environment. Solidification is a process that encapsulates material in a low-permeability material to limit and minimize contaminant migration by decreasing the surface area exposed for leaching to surrounding soil and/or groundwater.

Solidification consists of in-situ blending of portland cement with wood waste. The cement reduces the mobility of many contaminants by creating insoluble hydroxides, carbonates, and silicates and provides a solid encapsulation matrix to reduce leaching to surrounding soil and/or groundwater (Wilk 2007). In addition, solidification also increases bearing capacity of the subsurface, which would allow for future redevelopment and construction of buildings on the Property.

This remediation approach was retained for additional evaluation as it represents a permanent cleanup action alternative for wood waste at the Site.

5.2.3 Dewatering

Dewatering is the process of pumping groundwater collected in sumps, trenches, and wells within the excavation or treatment area. Dewatering of groundwater will be required to excavate and dispose of saturated wood waste. This process would remove contaminant mass.

Dewatering was retained for additional evaluation as a cleanup action alternative component to be used in conjunction with other remedial approaches.

5.2.4 Institutional Controls

Institutional controls are measures undertaken to limit or prohibit activities that may interfere with the integrity of a cleanup action, or may result in exposure to hazardous substances at a site, and may include:

- Physical measures such as fences or capping;
- Restrictions to limit the use of property or resources, or requirements that cleanup action occur if existing structures or pavement are disturbed or removed;
- Maintenance requirements for engineered controls such as the inspection and repair of monitoring wells, treatment systems, caps, or groundwater barrier systems;
- Educational programs such as signs, postings, public notices, health advisories, mailings, and similar measures that educate the public and /or employees about site contamination and ways to limit exposure; and
- Financial assurances.

Institutional controls can be effective protective measures preventing exposure to contaminated soil, soil gas, and/or groundwater, and are considered readily implementable at the Site at a significantly lower cost than other remedial action approaches.

5.3 IDENTIFICATION OF CLEANUP ACTION ALTERNATIVES

Based on the initial screening of cleanup action components, the following four cleanup action alternatives were developed to be further evaluated in the feasibility study:

- Cleanup Action Alternative 1: Excavation and Disposal;
- Cleanup Action Alternative 2: Solidification; and
- Cleanup Action Alternative 3: Institutional Controls.

A description of each cleanup action alternative is provided below and summarized in Table 10. Summary cost estimates developed for the three cleanup action alternatives are provided in Table 11. The detailed evaluation of each alternative is presented in Table 12. Figures 11 through 13 show the conceptual layout of each cleanup action alternative.

5.3.1 Cleanup Action Alternative 1: Excavation and Disposal

This cleanup action alternative involves the excavation, removal, and disposal of wood waste at the Site.

Under this alternative, Site infrastructure, including structures, monitoring wells, and utilities, would be removed to allow for excavation of all wood waste on the Site. Excavation would extend to depth of 11.5 and 16 feet bgs on the northern parcel and the southern parcel, respectively. The excavation area would total approximately 75,000 cubic yards. Figure 11 shows the proposed excavation area.

Dewatering would also be required for the excavation area because the excavation would extend into the saturated zone on the southern parcel. The dewatering system is anticipated to include sump pumps connected to temporary holding tanks and a treatment system, as necessary to discharge dewatered groundwater to the stormwater sewer system under an Ecology Construction Stormwater General Permit.

This alternative would be expected to result in the excavation of approximately 75,000 cubic yards of wood waste, all of which would be transported to a licensed solid waste disposal or recycling facility. Approximately 75,000 cubic yards of clean backfill would be imported and placed in the excavation to bring it back to grade.

The anticipated restoration time frame for this alternative would be 2 years. Excavation would remove all wood waste from the Site, which would then be followed by one year of confirmation groundwater monitoring.

The estimated cost to implement this alternative is summarized below from Table 11:

Capital Cost:	$14,708,000
Ongoing Periodic and Future Cost:	$60,000
Cleanup Action Alternative 1 Total:	**$14,768,000**

5.3.2 Cleanup Action Alternative 2: Solidification

This cleanup action alternative involves encapsulating wood waste in cement to minimize leachability. This cleanup alternative assumes that 75,000 cubic yards of wood waste will be

stabilized in-place. Solidification of wood waste is achieved by in situ mixing of wood waste with low-permeability portland cement via excavation equipment, effectively decreasing the surface area of wood waste with the potential to leach to surrounding soil and/or groundwater. Due to the mixing process and addition of portland cement, approximately 20 percent of the treatment area soil volume, 15,000 cubic yards, will be excess material and require off-site disposal.

Engineered controls will consist of a cap over the soil solidification treatment area to minimize surface water infiltration. Institutional controls will include an environmental covenant recorded on the Property deed. Institutional and engineering controls will include inspections and maintenance, and long-term compliance groundwater monitoring. The conceptual layout for this cleanup alternative is shown on Figure 12.

The anticipated restoration time frame for this alternative would be 5 years. Solidification would be followed by 5 years of confirmation groundwater monitoring.

The estimated cost to implement this alternative is summarized below from Table 11:

Capital Cost:	$23,112,000
Ongoing Periodic and Future Cost:	$125,000
Cleanup Action Alternative 2 Total:	**$23,237,000**

5.3.3 Cleanup Action Alternative 3: Institutional Controls

This cleanup action alternative involves institutional controls to protect against exposure to groundwater at the Site and groundwater monitoring to ensure that contaminated groundwater remains stable beneath the Property.

Under this alternative, an institutional control in the form of an environmental covenant would be recorded against the Property to limit activities that could expose, extract, or disturb wood waste or contaminated groundwater. Groundwater monitoring would be performed at the existing monitoring well network periodically to evaluate the COC concentrations and ensure that they remain stable or decrease in groundwater beneath the Property. Groundwater monitoring would be performed for 10 years. However, monitoring frequency will be re-evaluated during Ecology's first 5-year periodic review.

The anticipated restoration time frame for this alternative would be 10 years but it could be shorter if cleanup standards for groundwater are achieved sooner. Figure 13 shows the location of the restricted ground disturbance area and the locations of the monitoring well network.

The estimated cost to implement this alternative is summarized below from Table 11:

Capital Cost:	$14,000
Ongoing Periodic and Future Cost:	$165,000
Cleanup Action Alternative 3 Total:	**$179,000**

5.4 EVALUATION OF CLEANUP ACTION ALTERNATIVES

A detailed evaluation was conducted on Cleanup Action Alternatives 1 through 3 to determine whether they meet the requirements of WAC 173-340-360 and conform, as appropriate, to the expectations in WAC 173-340-370. The evaluation indicates that Cleanup Action Alternatives 1 through 3 meet the MTCA requirements for a cleanup action. The results from the evaluation are summarized in Table 12.

In addition, MTCA requires evaluation of the following for each cleanup action alternative:

- Provides for a reasonable restoration time frame. The requirements and procedures for determining whether a cleanup action alternative provides for a reasonable restoration time frame is provided in WAC 173-340-360(4).
- Uses permanent solutions to the maximum extent practicable. The requirements and procedures for determining whether a cleanup action alternative uses permanent solutions to the maximum extent practicable, as required under RCW 70A.305.030(1) and WAC 173-340-360(3)(a)(x). A permanent cleanup action or permanent solution is defined in WAC 173-340-200.

Additional evaluation of the cleanup action alternatives is provided below.

5.5 RESTORATION TIME FRAME

The restoration time frame is the period of time needed for a cleanup action to achieve the cleanup levels at the point of compliance. To determine whether a cleanup action alternative provides for a reasonable restoration time frame, the following factors must be considered:

- Potential risks posed by the Site to human health and the environment, including likely vulnerable populations and overburdened communities.
- Practicability of achieving a shorter restoration time frame. A restoration time frame is not reasonable if an active remedial measure with a shorter restoration time frame is practicable.

- Long-term effectiveness of the alternative. A longer restoration time frame may be reasonable if the alternative has a greater degree of long-term effectiveness than one that primarily relies on disposal, isolation, or containment.
- Current use of the Site, surrounding areas, and associated resources that are, or may be, affected by releases from the Site.
- Potential future use of the Site, surrounding areas, and associated resources that are, or may be, affected by releases from the Site.
- Availability of alternative water supplies.
- Likely effectiveness and reliability of institutional controls.
- Ability to control and monitor migration of hazardous substances from the Site.
- Toxicity of the hazardous substances at the Site.
- Natural processes that reduce concentrations of hazardous substances and have been documented to occur at the Site or under similar site conditions.

An estimated restoration time frame was provided in the description of each cleanup action alternative presented in Section 5.3. Each of the alternatives evaluated in the feasibility study is considered to provide a reasonable restoration time frame.

5.6 DISPROPORTIONATE COST ANALYSIS

The purpose of a DCA is to determine whether a cleanup action uses permanent solutions to the maximum extent practicable by comparing the relative benefits and costs of cleanup action alternatives. In accordance with WAC 173-340-360(5)(d), the DCA quantifies the environmental benefits using six criteria, which are described below.

- **Protectiveness.** The degree to which the alternative protects human health and the environment, including likely vulnerable populations and overburdened communities. Protectiveness considers the degree to which existing risks are reduced; the time required to reduce risk and attain cleanup standards; on-Site and off-Site risks remaining after implementing the alternative; and improvement of overall environmental quality.
- **Permanence.** The degree to which the alternative permanently reduces the toxicity, mobility, or volume of hazardous substances, including the adequacy of the alternative in destroying the hazardous substances, the reduction or elimination of hazardous substance releases and sources of releases, the degree of irreversibility of

the waste treatment process, and the characteristics and quantity of treatment residuals generated.

- **Long-term effectiveness.** The degree of certainty that the alternative will be successful, the reliability of the alternative during the period of time that hazardous substances are expected to remain on the Site at concentrations that exceed cleanup levels, the resilience of the alternative to climate change impacts, the magnitude of residual risk with the alternative in place, and the effectiveness of controls required to manage remaining wastes. The following types of cleanup action components may be used as a guide, in descending order, when assessing the relative degree of long-term effectiveness: reuse or recycling; destruction or detoxification; immobilization or solidification; disposal in an engineered, lined, and monitored facility; isolation or containment with attendant engineered controls on the Site; and institutional controls and monitoring.
- **Management of implementation risks.** The risk to human health and the environment, including likely vulnerable populations and overburdened communities, associated with the alternative during construction and implementation, and the effectiveness of measures that will be taken to manage such risks.
- **Technical and administrative implementability.** The ability to implement the alternative, including the technical difficulty of designing, constructing, and otherwise implementing the alternative in a reliable and effective manner, regardless of cost; the availability of necessary off-site facilities, services, and materials; administrative and regulatory requirements; scheduling, size, and complexity; monitoring requirements; access for construction operations and monitoring; and integration with existing facility operations and other current or potential remedial actions.
- **Cost.** The cost to implement the alternative, including construction and post construction costs. Construction costs include pre-construction engineering design and permitting, physical construction (including labor, equipment, materials, and contingencies), waste management and disposal, compliance monitoring during construction (including sampling and analysis), construction management, establishment of institutional controls, regulatory oversight, and quality assurance and quality control. Post-construction costs include operation and maintenance activities necessary to maintain the effectiveness of a constructed cleanup action component, waste management and disposal, replacement or repair of equipment (including labor, equipment, and materials), permit renewal, compliance monitoring

(including sampling and analysis), maintaining institutional controls, financial assurances, periodic reviews, post-construction management, and regulatory oversight.

Environmental benefit was quantified by scoring each cleanup action alternative with respect to the criteria listed above. A numeric score ranging from 0 to 10 was assigned to each of the criteria, except cost, based on best professional judgment. The higher the score, the more favorable the alternative is under MTCA. The criteria scores were weighted according to Ecology (2009) suggestions to calculate a Composite Benefit Score, which provides the quantitative measure of environmental benefit that will be realized by implementation of each alternative. The weighting factors for the criteria were:

- Protectiveness: 30 percent;
- Permanence: 20 percent;
- Long-Term Effectiveness: 20 percent;
- Short-Term Effectiveness: 10 percent;
- Implementability: 10 percent; and
- Public Concerns: 10 percent.

Table 12 summarizes the basis for the scoring and the estimated costs for the four cleanup action alternatives. Chart 1 graphically presents the results from the DCA. The orange bars on Chart 1 reflect the environmental benefit offered by each alternative as measured by the Composite Benefit Score on the left vertical axis of the graph. The blue bars reflect the estimated cost of each alternative on the right vertical axis of the graph. The incremental benefit of an alternative relative to its incremental cost thus can be discerned.

Table 12 presents the MTCA evaluation criteria, the weighting factors, and the calculated cumulative benefit ranking (i.e., weighted average) for each cleanup action alternative. A comparison of the overall benefit ranking versus the estimated cost for each of the alternatives is presented graphically on Chart 1. The Composite Benefit Score and estimated total cost for each alternative are provided below.

	Composite Benefit Score	Estimated Total Cost
Cleanup Action Alternative 1	7.1	$14,768,000
Cleanup Action Alternative 2	6.6	$23,237,000
Cleanup Action Alternative 3	7.2	$179,000

Based on the Composite Benefit Score and estimated cost of each cleanup action alternative, Cleanup Action Alternative 3 offers the greatest environmental benefit for the lowest cost of the three cleanup action alternatives. The results from the DCA confirm that Cleanup Action Alternative 3 provides a permanent solution to the maximum extent practicable, meets the evaluation criteria defined in WAC 173-340-360(5)(d), and provides a higher degree of environmental benefit over the other alternatives.

Based on the DCA, Cleanup Action Alternative 3 is selected as the preferred cleanup action alternative for the Site.

5.7 PREFERRED CLEANUP ACTION ALTERNATIVE

Based on Site-specific conditions, the most practicable and effective cleanup approach for the Site is Cleanup Action Alternative 3, which involves institutional controls to protect against exposure to groundwater at the Site and groundwater monitoring to ensure that contaminated groundwater remains stable beneath the Property. Figure 13 shows the location of the restricted ground disturbance area and the locations of the monitoring well network.

Cleanup Action Alternative 3 satisfies the MTCA general requirements in WAC 173-340-360(3)(a) and meets additional requirements specified in 173-340-360(3)(b), WAC 173-340-360(3)(c), and WAC 173-340-360(3)(d), and expectations specified in WAC 173-340-370. While Cleanup Action Alternative 1 would provide an increased level of permanence, the additional environmental benefit would be achieved at a disproportionate cost to the incremental gains in the Composite Benefit Score. Cleanup Action Alternative 3 therefore uses permanent solutions to the maximum extent practicable per WAC 173-340-360(5)(d) and achieves the highest Composite Benefit Score.

Cleanup Action Alternative 3 would be cost-effective, easily implementable, and would protect human health and the environment.

6.0 CLEANUP ACTION PLAN

This section presents a description of the proposed cleanup action and a discussion of compliance monitoring; and summarizes the primary activities and technical elements of the cleanup action.

6.1 DESCRIPTION OF THE CLEANUP ACTION

Cleanup action alternative 3 involves institutional controls to protect against exposure to groundwater at the Site and groundwater monitoring to ensure that contaminated groundwater remains stable beneath the Property.

Under this alternative, an institutional control in the form of an environmental covenant would be recorded against the Property to limit activities that could expose, extract, or disturb wood waste or contaminated groundwater. Groundwater monitoring would be performed at the existing monitoring well network periodically to evaluate the COC concentrations and ensure that they remain stable or decrease in groundwater beneath the Property. Groundwater monitoring would be performed for 10 years. However, monitoring frequency will be re-evaluated during Ecology's first 5-year periodic review.

Figure 13 shows the location of the restricted ground disturbance area and the locations of the monitoring well network.

6.2 APPLICABLE LOCAL, STATE, AND FEDERAL LAWS

The cleanup action must comply with applicable local, state, and federal laws (WAC 173-340-710). The applicable local, state, and federal laws for the cleanup action are provided below.

6.2.1 Washington State Model Toxics Control Act Cleanup Regulation

The MTCA statute (Chapter 70A.305 Revised Code of Washington [RCW]) is the primary law that governs cleanup of contaminated sites in the state of Washington. The MTCA cleanup regulation (WAC 173-340) specifies criteria for the evaluation and conduct of a cleanup action. It requires that cleanup actions protect human health and the environment, meet environmental standards in other applicable laws, and provide for monitoring to confirm compliance with cleanup levels.

For cleanup actions involving containment of hazardous substances, MTCA has requirements that must be met for the cleanup action to be considered in compliance with

soil cleanup standards. These include implementing a compliance monitoring program that is designed to ensure the long-term integrity of the containment system and applying institutional controls where appropriate to the affected areas (WAC 173-340-440).

6.2.2 Tacoma-Pierce County Health Department and City of Puyallup

The Site is outside the City of Puyallup city limits and therefore falls under the jurisdiction of Pierce County. TPCHD, in conjunction with Ecology, consider methane to be an Applicable or Relevant and Appropriate Requirement (ARAR) since methane can be an explosivity concern at a site. MTCA focuses on potential chronic health and environment-related concerns from toxic substances; however, as an ARAR, methane concerns still need to be appropriately addressed.

Since the Site is not a permitted disposal facility and no municipal solid waste has been disposed of at the Site, solid waste regulations are not directly applicable. Ecology considers methane at non-solid waste facilities to be the responsibility of an appropriate local entity. At this Site, since no redevelopment is planned that would trigger a SEPA review, there are no specific local regulations or requirements that are triggered. However, based on communications between Ecology and TPCHD, TPCHD plans to review and/or provide consultation with regards to potential mitigation measures. Ecology may use TPCHD consultation feedback as documentation that this ARAR has been appropriately addressed prior to issuing an NFA determination for the Site.

Appendix A provides a Methane Mitigation Plan that could be implemented to mitigate methane soil gas vapor intrusion into any future buildings to protect human health and the environment.

6.2.3 Worker Safety Regulations

The Occupational Safety and Health Administration (OSHA) (29 CFR 1910.120) and Washington Industrial Safety and Health Act (WISHA) (WAC 296-62) govern worker safety during the cleanup action. Compliance would be achieved through preparation and implementation of a Site-specific HASP(s) with appropriate controls, worker training and certifications, and occupational monitoring.

6.2.4 Washington State Water Well Construction Regulations

Monitoring wells will be installed and decommissioned as part of the cleanup action in accordance with the Minimum Standards for Construction and Maintenance of Wells (WAC 173-160).

6.3 INSTITUTIONAL CONTROLS

Institutional controls are measures taken to limit or prohibit activities that may interfere with the integrity of the cleanup action or that may result in exposures to hazardous substances at the Site. An institutional control in the form of an Environmental Covenant will be required for the Property. The Environmental Covenant will be prepared following completion of active remediation and restoration activities, and will be implemented following approval by Ecology and completion of administrative and recording requirements according to RCW 64.70 and 65.04.

The Environmental Covenant for the Property will consist of:

- Periodic long-term groundwater monitoring in accordance with Section 6.4.
- Land-use restrictions to prohibit any activity that may result in the release or exposure of residual COCs in soil at the Site.
- Requirements for worker safety during subsurface work, such as utility line maintenance, new construction, and building and facility improvements and maintenance.
- Advance notification of Ecology concerning the proposed sale or conveyance of the Site, or proposed use of the Site that may be inconsistent with the terms of the Environmental Covenant.
- Restrictions on groundwater use for any purpose, with the exception of monitoring.
- Access by Ecology personnel for inspection and review of records, and to determine compliance with the required monitoring and maintenance.

6.4 COMPLIANCE MONITORING

Compliance monitoring is required to ensure the protectiveness of the cleanup action performed in accordance with WAC 173-340-410: protection monitoring, performance monitoring, and confirmational monitoring. The objectives of compliance monitoring are paraphrased below (WAC 173-340-410):

- **Protection Monitoring** is used to confirm that human health and the environment are adequately protected during construction of the cleanup action and post-construction monitoring. Protection monitoring requirements will be described in Site-specific HASP(s) that address worker activities during remedy construction and post-construction monitoring.
- **Performance Monitoring** is used to confirm that the cleanup action has attained cleanup standards and other performance standards. Performance monitoring will be conducted throughout each phase of remedy construction to document that remedial goals are being achieved.
- **Confirmation Monitoring** is used to confirm the long-term effectiveness of the cleanup action after completion of the preferred remedy. Confirmation monitoring will include long-term monitoring to document that cleanup levels continue to be attained. The proposed compliance monitoring well network is shown on Figure 13.

6.4.1 Protection Monitoring

A HASP will be prepared for the cleanup action that meets the minimum requirements for such a plan identified in federal (29 CFR 1910.120 and 1926) and state (WAC 173-340-810 and 296) regulations. The HASP identifies all known physical, chemical, and biological hazards; hazard monitoring protocols; and administrative and engineering controls required to mitigate the identified hazards. Protection monitoring will be performed in accordance with the HASP.

Construction workers encountering Impacted Soil will have completed 40-Hour Hazardous Waste Operations and Emergency Response (HAZWOPER) training in accordance with 29 CFR 1910.120 and will have completed Annual 8-Hour HAZWOPER refresher training, as needed.

6.4.2 Confirmational Groundwater Sampling

Confirmational groundwater monitoring events will be conducted every 15 months to assess seasonal trends, beginning in 2025, for at least 5 years until Ecology's first Periodic Review. Each confirmational groundwater monitoring event will include measuring depth to groundwater and collecting groundwater samples from monitoring wells FMW-1 through FMW-05 (Figure 2).

Field personnel will remove the locking well cap from each monitoring well, and groundwater levels will be allowed to equilibrate to atmospheric pressure for at least 30 minutes. The

depth to groundwater will be measured in each monitoring well to the nearest 0.01 foot using an electronic water-level measuring device to the top of the well casing. The total depth of each monitoring well will be measured to evaluate siltation of the well-screen interval and to calculate the submerged well-casing volume. Reusable equipment will be decontaminated between uses at each location.

Each monitoring well will be purged at a low-flow rate ranging from 100 to 300 milliliters per minute using a peristaltic or bladder pump and dedicated tubing. Temperature, pH, specific conductance, dissolved oxygen, turbidity, and oxidation-reduction potential will be monitored during purging to determine when stabilization of these parameters occurs. Following stabilization of the parameters, groundwater samples will be collected directly from the low-flow pump outlet.

Laboratory-prepared sample containers will be filled directly from the pump outlet, with care taken to minimize turbulence and not handle the seal or lid of the container when the samples are placed into the containers. The groundwater samples will be placed on ice in a cooler under standard chain-of-custody protocols and submitted to an Ecology-accredited laboratory for analysis of the following:

- Total petroleum hydrocarbons as diesel-range organics and as oil-range organics by Northwest Method NWTPH-Dx, with and without Silica Gel Cleanup;
- Total and dissolved arsenic by U.S. Environmental Protection Agency Methods 200.8 and 6020B; and
- Total organic carbon by Standard Method 5310C.

6.5 REPORTING

A groundwater monitoring report summarizing the four groundwater monitoring events will be prepared and submitted to Ecology prior to the first 5-year periodic review. The groundwater monitoring report will include the following:

- Summary of the groundwater monitoring events;
- Figures showing locations of relevant monitoring wells and Site features, groundwater contours, and groundwater analytical results;
- Tables providing analytical results and water level elevations;

- Discussion of the groundwater sample analytical results and comparison to MTCA cleanup levels; and
- Laboratory analytical reports.

7.0 BIBLIOGRAPHY

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8.0 LIMITATIONS

8.1 GENERAL LIMITATIONS

The conclusions contained in this report/assessment are based on professional opinions with regard to the subject matter. These opinions have been arrived at in accordance with currently accepted hydrogeologic and engineering standards and practices applicable to this location. The conclusions contained herein are subject to the following inherent limitations:

- **Accuracy of Information.** Farallon obtained, reviewed, and evaluated certain information used in this report/assessment from sources that were believed to be reliable. Farallon's conclusions, opinions, and recommendations are based in part on such information. Farallon's services did not include verification of its accuracy or authenticity. Should the information upon which Farallon relied prove to be inaccurate or unreliable, Farallon reserves the right to amend or revise its conclusions, opinions, and/or recommendations.

Reconnaissance and/or Characterization. Farallon performed a reconnaissance and/or characterization of the Site that is the subject of this report/assessment to document current conditions. Farallon focused on areas deemed more likely to exhibit hazardous materials conditions. Contamination may exist in other areas of the Site that were not investigated or were inaccessible. Site activities beyond Farallon's control could change at any time after the completion of this report/assessment.

For the foregoing reasons, Farallon cannot and does not warrant or guarantee that the Site is free of hazardous or potentially hazardous substances or conditions, or that latent or undiscovered conditions will not become evident in the future. Farallon's observations, findings, and opinions can be considered valid only as of the date of the report.

This report/assessment has been prepared in accordance with the contract for services between Farallon and REDCO Development LLC, and currently accepted industry standards. No other warranties, representations, or certifications are made.

8.2 LIMITATION ON RELIANCE BY THIRD PARTIES

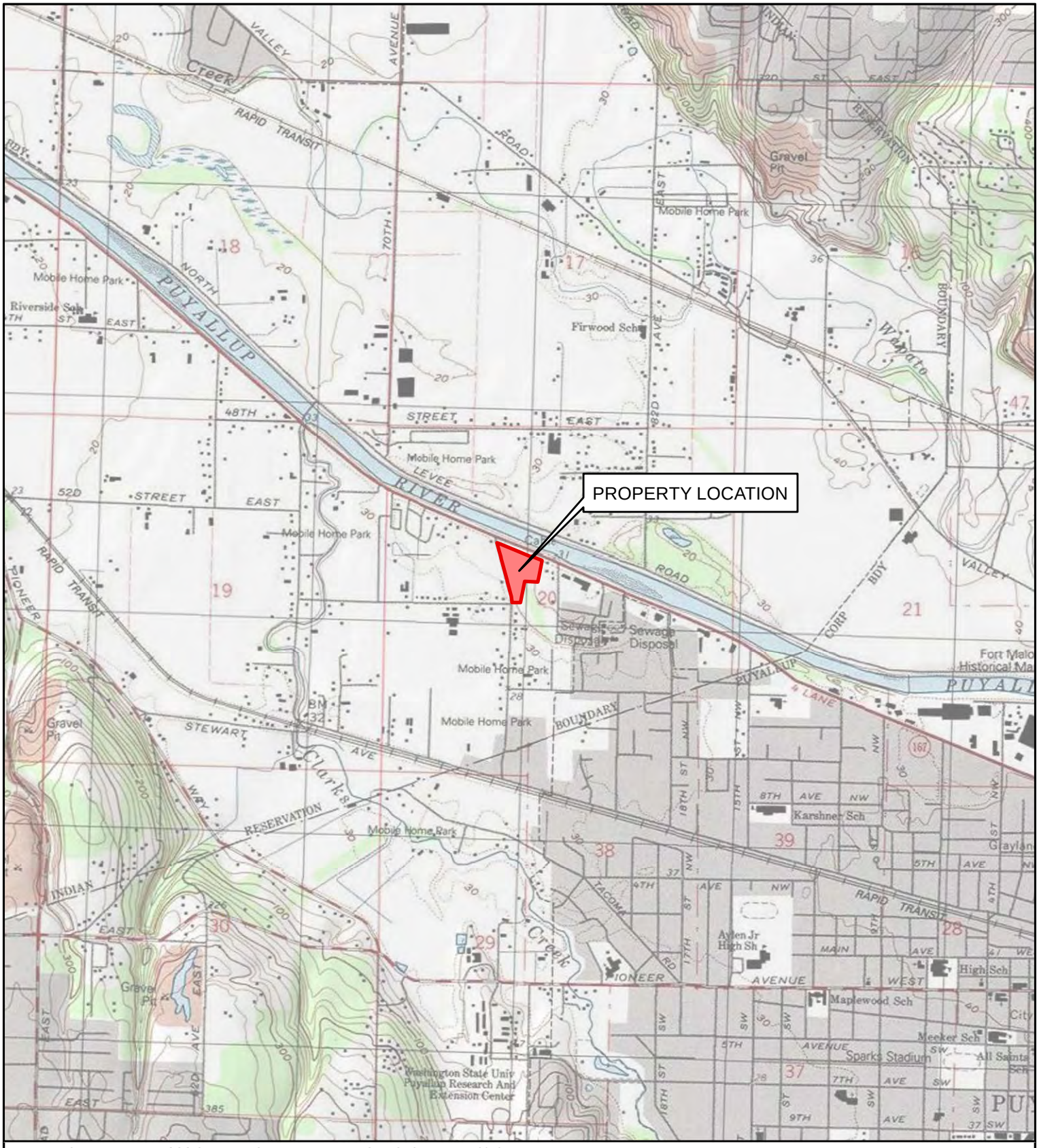
Reliance by third parties is prohibited. This report/assessment has been prepared for the exclusive use of REDCO Development LLC to address the unique needs of REDCO Development LLC at the Property at a specific point in time.

This is not a general grant of reliance. No one other than REDCO Development LLC may rely on this report unless Farallon agrees in advance to such reliance in writing. Any unauthorized use, interpretation, or reliance on this report/assessment is at the sole risk of that party and Farallon will have no liability for such unauthorized use, interpretation, or reliance.

FIGURES

FEASIBILITY STUDY AND CLEANUP ACTION PLAN
7602 and 7702 River Road East
Puyallup, Washington

Farallon PN: 2220-008



REFERENCE: 7.5 MINUTE USGS QUADRANGLE PUYALLUP, WASHINGTON, DATED 2013

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SCALE IN FEET

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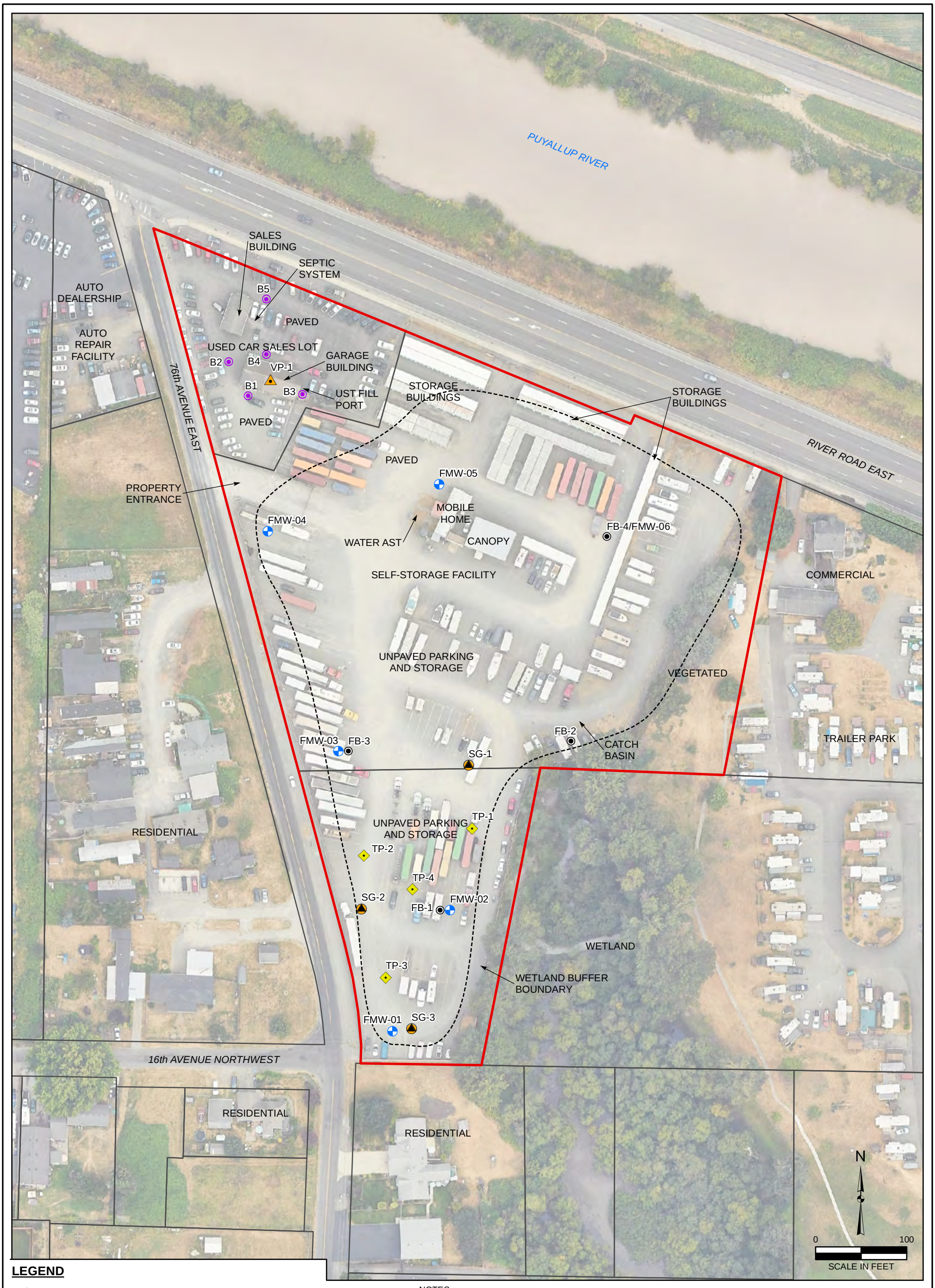
FIGURE 1

PROPERTY VICINITY MAP
7602 AND 7702 RIVER ROAD EAST
PUYALLUP, WASHINGTON

FARALLON PN: 2220-008

Drawn By: lmurock | Checked By: PK | Date: 9/26/2023 | Disc Reference:

Path: Q:\Projects\2220 REDCO\008 7602 and 7702 River Dr E\Mapfiles\006\Figure-01_VicinityMap.mxd



LEGEND

- SOIL VAPOR PROBE (FARALLON, 2024)
- SOIL GAS SAMPLE (FARALLON, 2023)
- BORING (FARALLON, 2023)
- BORING (BBG, 2022)
- MONITORING WELL (FARALLON, 2023)
- TEST PIT (GEOTECHNICAL CONSULTING, 2016)
- APPROXIMATE EXTENT OF FORMER WOOD WASTE LANDFILL
- PROPERTY BOUNDARY
- PIERCE COUNTY PARCEL BOUNDARY

NOTES:
1. ALL LOCATIONS ARE APPROXIMATE.
2. FIGURES WERE PRODUCED IN COLOR. GRAYSCALE COPIES MAY NOT REPRODUCE ALL ORIGINAL INFORMATION.

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FIGURE 2

PROPERTY PLAN
7602 AND 7702 RIVER ROAD EAST
PUYALLUP, WASHINGTON

FARALLON PN: 2220-008

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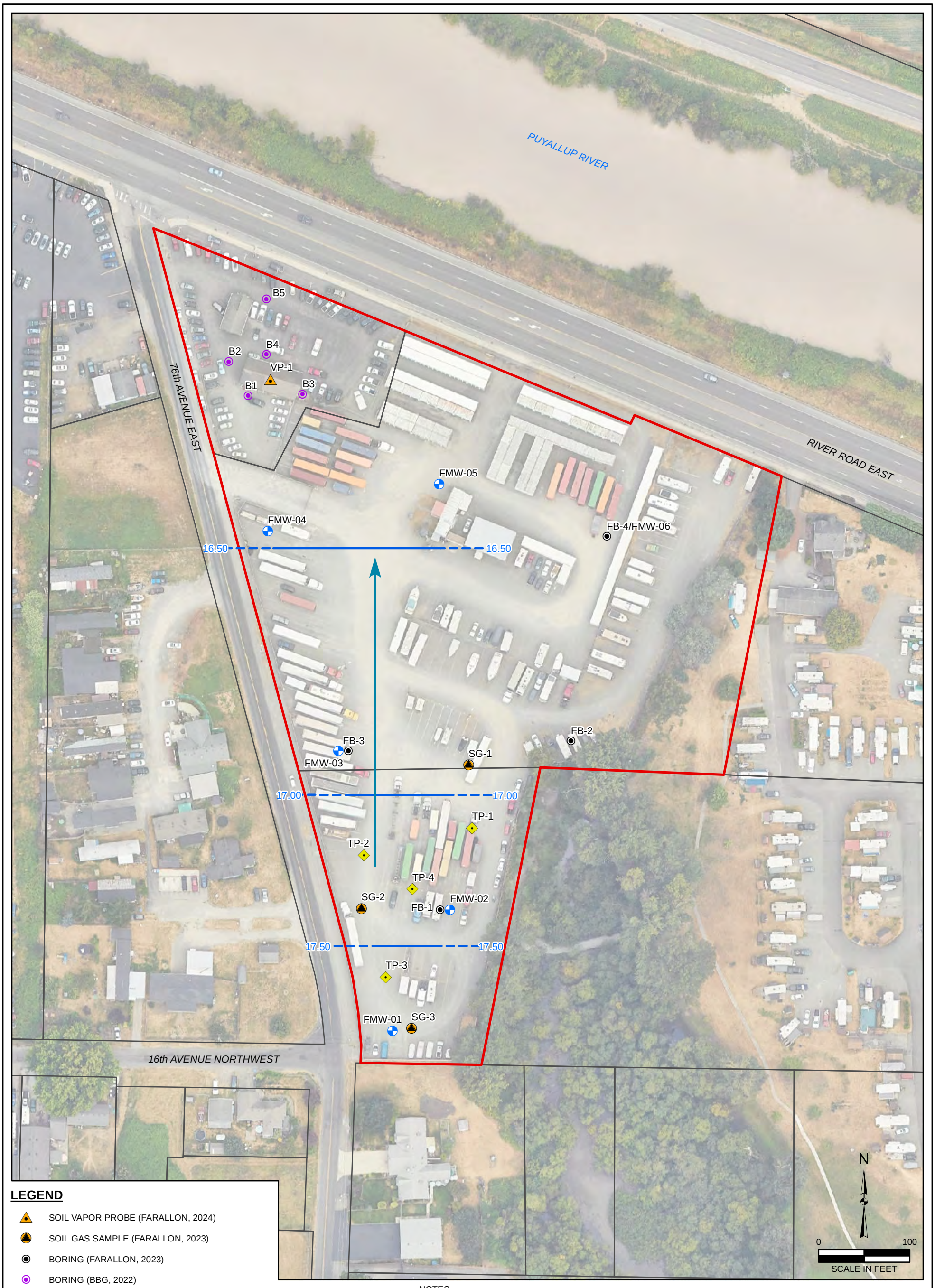

LEGEND

- SOIL VAPOR PROBE (FARALLON, 2024)
- SOIL GAS SAMPLE (FARALLON, 2023)
- BORING (FARALLON, 2023)
- BORING (BBG, 2022)
- MONITORING WELL (FARALLON, 2023)
- TEST PIT (GEOTECHNICAL CONSULTING, 2016)
- PROPERTY BOUNDARY
- PIERCE COUNTY PARCEL BOUNDARY
- (17.80) GROUNDWATER ELEVATION MEASURED IN FEET REFERENCED TO NORTH AMERICAN VERTICAL DATUM OF 1988 (NAVD88)
- 17.50 GROUNDWATER ELEVATION CONTOUR (DASHED WHEN INFERRED)
- APPROXIMATE GROUNDWATER FLOW DIRECTION

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FIGURE 3

GROUNDWATER ELEVATION CONTOURS
SEPTEMBER 15, 2023
7602 AND 7702 RIVER ROAD EAST
PUYALLUP, WASHINGTON

FARALLON PN: 2220-008

Drawn By: lmurock | Checked By: SH | Date: 1/28/2025 | Disc Reference:

Path: Q:\Projects\2220 REDCO\008 7602 and 7702 River Dr E\Mapfiles\010\Figure-03_GW_Contours_202309.mxd

PUYALLUP RIVER

RIVER ROAD EAST

76th AVENUE EAST

16th AVENUE NORTHWEST

B5
B4
B2
VP-1
B1
B3
FMW-05
FMW-04
FB-4/FMW-06
19.00
19.50
20.00
20.50
FMW-03
FB-3
SG-1
FB-2
TP-1
TP-2
TP-4
SG-2
FB-1
FMW-02
TP-3
SG-3
FMW-01

LEGEND

- SOIL VAPOR PROBE (FARALLON, 2024)
- SOIL GAS SAMPLE (FARALLON, 2023)
- BORING (FARALLON, 2023)
- BORING (BBG, 2022)
- MONITORING WELL (FARALLON, 2023)
- TEST PIT (GEOTECHNICAL CONSULTING, 2016)
- PROPERTY BOUNDARY
- PIERCE COUNTY PARCEL BOUNDARY

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FIGURE 4

GROUNDWATER ELEVATION CONTOURS
MAY 16, 2024
7602 AND 7702 RIVER ROAD EAST
PUYALLUP, WASHINGTON

FARALLON PN: 2220-008

Drawn By: lmurock | Checked By: SH | Date: 1/28/2025 | Disc Reference:

Path: Q:\Projects\2220 REDCO\008 7602 and 7702 River Dr E\Mapfiles\010\Figure-04_GW_Elevation_20240516.mxd

LEGEND

- MONITORING WELL (FARALLON, 2023)
- APPROXIMATE EXTENT OF FORMER WOOD WASTE LANDFILL
- PROPERTY BOUNDARY
- PIERCE COUNTY PARCEL BOUNDARY
- (18.05) GROUNDWATER ELEVATION MEASURED IN FEET REFERENCED TO NORTH AMERICAN VERTICAL DATUM OF 1988 (NAVD88)
- 18.00 GROUNDWATER ELEVATION CONTOUR (DASHED WHERE INFERRED)
- APPROXIMATE GROUNDWATER FLOW DIRECTION

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FIGURE 5

GROUNDWATER ELEVATION CONTOURS
OCTOBER 24, 2024
7602 AND 7702 RIVER ROAD EAST
PUYALLUP, WASHINGTON

FARALLON PN: 2220-008

Drawn By: lmurock | Checked By: SH | Date: 1/28/2025 | Disc Reference:

Path: Q:\Projects\2220 REDCO\008 7602 and 7702 River Dr E\Mapfiles\010\Figure-05_GW_Contours_202410.mxd

NOTES:
SOIL DEPTH AND ANALYTICAL RESULTS AS:
DEPTH IN FEET BELOW GROUND SURFACE | DRO | ORO | GRO
SOIL ANALYTICAL RESULTS IN MILLIGRAMS PER KILOGRAM.
< = DENOTES ANALYTE NOT DETECTED AT OR EXCEEDING THE LISTED REPORTING LIMIT
--- = DENOTES SAMPLE NOT ANALYZED
DRO = TOTAL PETROLEUM HYDROCARBONS (TPH) AS DIESEL-RANGE ORGANICS
GRO = TPH AS GASOLINE-RANGE ORGANICS
ORO = TPH AS OIL-RANGE ORGANICS

LEGEND

- SOIL VAPOR PROBE (FARALLON, 2024)
- SOIL GAS SAMPLE (FARALLON, 2023)
- BORING (FARALLON, 2023)
- BORING (BBG, 2022)
- MONITORING WELL (FARALLON, 2023)
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- PROPERTY BOUNDARY
- PIERCE COUNTY PARCEL BOUNDARY

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FIGURE 6

SOIL ANALYTICAL RESULTS FOR TPH
7602 AND 7702 RIVER ROAD EAST
PUYALLUP, WASHINGTON

FARALLON PN: 2220-008

Drawn By: lmurock | Checked By: SH | Date: 1/28/2025 | Disc Reference:

Path: Q:\Projects\2220 REDCO\008 7602 and 7702 River Dr E\Mapfiles\010\Figure-06_Soil_TPH.mxd

NOTES:
SOIL DEPTH AND ANALYTICAL RESULTS AS:
DEPTH IN FEET BELOW GROUND SURFACE | ARSENIC
SOIL ANALYTICAL RESULTS IN MILLIGRAMS PER KILOGRAM.
< = DENOTES ANALYTE NOT DETECTED AT OR EXCEEDING THE LISTED REPORTING LIMIT

LEGEND

- SOIL VAPOR PROBE (FARALLON, 2024)
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FIGURE 7

SOIL ANALYTICAL RESULTS FOR ARSENIC
7602 AND 7702 RIVER ROAD EAST
PUYALLUP, WASHINGTON

FARALLON PN: 2220-008

Drawn By: lmurock | Checked By: SH | Date: 1/28/2025 | Disc Reference:

Path: Q:\Projects\2220 REDCO\008 7602 and 7702 River Dr E\Mapfiles\010\Figure-07_Soil_Arsenic.mxd

PUYALLUP RIVER

RIVER ROAD EAST

76th AVENUE EAST

16th AVENUE NORTHWEST

B5
9/28/2022|---|<225|---

B4
9/28/2022|---|<225|---

B2

VP-1

B3
9/28/2022|---|<225|---

B1
9/28/2022|---|<225|---

FMW-05
9/15/2023|**550**|<150|**550**
2/6/2024|**1,400**|<250|**1,400**

FB-4/FMW-06

FMW-04
9/15/2023|**920**|<150|**920**
2/6/2024|<250|<250|<250

FMW-03
9/15/2023|**2,950**|<150|**2,950**
2/6/2024|**1,900**|<250|**1,900**

FB-3
8/17/2023|**9,600**|**3,600**|**6,000**

FB-2
8/17/2023|270|---|---

TP-1

TP-2

FB-1
8/17/2023|269|---|---

TP-4

FMW-02
9/15/2023|**540**|<150|**540**
2/6/2024|260|<250|260

TP-3

FMW-01
9/15/2023|**810**|<150|**810**
2/6/2024|**710**|<250|**710**

NOTES:
GROUNDWATER SAMPLE DATE AND ANALYTICAL RESULTS AS:
DATE SAMPLED | TOTAL PETROLEUM + POLAR ORGANICS | TOTAL PETROLEUM | POLAR ORGANICS
GROUNDWATER ANALYTICAL RESULTS IN MICROGRAMS PER LITER.
BOLD = DENOTES CONCENTRATIONS THAT EXCEED THE WASHINGTON STATE MODEL TOXICS CONTROL ACT CLEANUP REGULATION CLEANUP LEVEL
< = DENOTES ANALYTE NOT DETECTED AT OR EXCEEDING THE LISTED REPORTING LIMIT
--- = DENOTES SAMPLE NOT ANALYZED

LEGEND

- SOIL VAPOR PROBE (FARALLON, 2024)
- BORING (FARALLON, 2023)
- BORING (BBG, 2022)
- MONITORING WELL (FARALLON, 2023)
- TEST PIT (GEOTECHNICAL CONSULTING, 2016)
- PROPERTY BOUNDARY
- PIERCE COUNTY PARCEL BOUNDARY

N

0 100

SCALE IN FEET

NOTES:
1. ALL LOCATIONS ARE APPROXIMATE.
2. FIGURES WERE PRODUCED IN COLOR. GRAYSCALE COPIES MAY NOT REPRODUCE ALL ORIGINAL INFORMATION.

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FIGURE 8

GROUNDWATER ANALYTICAL RESULTS
FOR TOTAL PETROLEUM HYDROCARBONS
7602 AND 7702 RIVER ROAD EAST
PUYALLUP, WASHINGTON

FARALLON PN: 2220-008

Drawn By: lmurock | Checked By: SH | Date: 1/28/2025 | Disc Reference:

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NOTES:
GROUNDWATER SAMPLE DATE AND ANALYTICAL RESULTS AS:
DATE SAMPLED | TOTAL ARSENIC | DISSOLVED ARSENIC
GROUNDWATER ANALYTICAL RESULTS IN MICROGRAMS PER LITER.
BOLD = DENOTES CONCENTRATIONS THAT EXCEED THE WASHINGTON STATE MODEL TOXICS CONTROL ACT CLEANUP REGULATION CLEANUP LEVEL
< = DENOTES ANALYTE NOT DETECTED AT OR EXCEEDING THE LISTED REPORTING LIMIT

LEGEND

- SOIL VAPOR PROBE (FARALLON, 2024)
- SOIL GAS SAMPLE (FARALLON, 2023)
- BORING (FARALLON, 2023)
- BORING (BBG, 2022)
- MONITORING WELL (FARALLON, 2023)
- TEST PIT (GEOTECHNICAL CONSULTING, 2016)
- PROPERTY BOUNDARY
- PIERCE COUNTY PARCEL BOUNDARY

N

0 100

SCALE IN FEET

NOTES:
1. ALL LOCATIONS ARE APPROXIMATE.
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FIGURE 9

GROUNDWATER ANALYTICAL RESULTS
FOR ARSENIC
7602 AND 7702 RIVER ROAD EAST
PUYALLUP, WASHINGTON

FARALLON PN: 2220-008

Drawn By: lmurock | Checked By: SH | Date: 1/28/2025 | Disc Reference:

Path: Q:\Projects\2220 REDCO\008 7602 and 7702 River Dr E\Mapfiles\010\Figure-09_GW_Arsenic.mxd

LEGEND

- SOIL VAPOR PROBE (FARALLON, 2024)
- SOIL GAS SAMPLE (FARALLON, 2023)
- BORING (FARALLON, 2023)
- BORING (BBG, 2022)
- MONITORING WELL (FARALLON, 2023)
- TEST PIT (GEOTECHNICAL CONSULTING, 2016)
- PROPERTY BOUNDARY
- PIERCE COUNTY PARCEL BOUNDARY

NOTES:
WOOD WASTE DEPTH IN FEET BELOW GROUND SURFACE.
SOIL VAPOR MEASUREMENT DATE AND ANALYTICAL RESULTS AS:
DATE MEASURED | METHANE CONCENTRATION
METHANE CONCENTRATIONS IN PERCENT.
> = DENOTES CONCENTRATION EXCEEDS FIELD INSTRUMENT CALIBRATION RANGE.

NOTES:
1. ALL LOCATIONS ARE APPROXIMATE.
2. FIGURES WERE PRODUCED IN COLOR. GRAYSCALE COPIES MAY NOT REPRODUCE ALL ORIGINAL INFORMATION.

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FIGURE 10

SOIL GAS CONCENTRATIONS FOR METHANE
7602 AND 7702 RIVER ROAD EAST
PUYALLUP, WASHINGTON

FARALLON PN: 2220-008

Drawn By: lmurock | Checked By: SH | Date: 1/28/2025 | Disc Reference:

Path: Q:\Projects\2220 REDCO\008 7602 and 7702 River Dr E\Mapfiles\010\Figure-10_SV_Methane.mxd

LEGEND

- APPROXIMATE EXTENT OF FORMER WOOD WASTE LANDFILL
- ESTIMATED EXTENT FOR EXCAVATION OF WOOD WASTE EXTENDING 11.5 FEET BELOW GROUND SURFACE
- ESTIMATED EXTENT FOR EXCAVATION OF WOOD WASTE EXTENDING 16 FEET BELOW GROUND SURFACE
- PROPERTY BOUNDARY
- PIERCE COUNTY PARCEL BOUNDARY

NOTES:
1. ALL LOCATIONS ARE APPROXIMATE.
2. FIGURES WERE PRODUCED IN COLOR. GRAYSCALE COPIES MAY NOT REPRODUCE ALL ORIGINAL INFORMATION.

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FIGURE 11

CONCEPTUAL LAYOUT
FOR CLEANUP ALTERNATIVE 1
7602 AND 7702 RIVER ROAD EAST
PUYALLUP, WASHINGTON

FARALLON PN: 2220-008

Drawn By: lmurock | Checked By: SH | Date: 2/3/2025 | Disc Reference:

Path: Q:\Projects\2220 REDCO\008 7602 and 7702 River Dr E\Mapfiles\010\Figure-11_CU_Alt_1.mxd

LEGEND

- PROPOSED MONITORING WELL (FARALLON, 2025)
- APPROXIMATE EXTENT OF FORMER WOOD WASTE LANDFILL
- ESTIMATED AREA OF SOIL STABILIZATION IN-PLACE AND CAP
- PROPERTY BOUNDARY
- PIERCE COUNTY PARCEL BOUNDARY

NOTES:
1. ALL LOCATIONS ARE APPROXIMATE.
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FIGURE 12

CONCEPTUAL LAYOUT
FOR CLEANUP ALTERNATIVE 2
7602 AND 7702 RIVER ROAD EAST
PUYALLUP, WASHINGTON

FARALLON PN: 2220-008

Drawn By: lmurock | Checked By: SH | Date: 2/3/2025 | Disc Reference:

Path: Q:\Projects\2220 REDCO\008 7602 and 7702 River Dr E\Mapfiles\010\Figure-12_CU_Alt_2.mxd

LEGEND

- MONITORING WELL
- APPROXIMATE EXTENT OF FORMER WOOD WASTE LANDFILL AND AREA OF RESTRICTED GROUNDWATER USE
- PROPERTY BOUNDARY
- PIERCE COUNTY PARCEL BOUNDARY

NOTES:
1. ALL LOCATIONS ARE APPROXIMATE.
2. FIGURES WERE PRODUCED IN COLOR. GRAYSCALE COPIES MAY NOT REPRODUCE ALL ORIGINAL INFORMATION.

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FIGURE 13

CONCEPTUAL LAYOUT
FOR CLEANUP ALTERNATIVE 3
7602 AND 7702 RIVER ROAD EAST
PUYALLUP, WASHINGTON

FARALLON PN: 2220-008

Drawn By: lmurock | Checked By: SH | Date: 2/3/2025 | Disc Reference:

Path: Q:\Projects\2220 REDCO\008 7602 and 7702 River Dr E\Mapfiles\010\Figure-13_CU_Alt_3.mxd

TABLES

FEASIBILITY STUDY AND CLEANUP ACTION PLAN
7602 and 7702 River Road East
Puyallup, Washington

Farallon PN: 2220-008

Table 1
Groundwater Elevations
7602 and 7702 River Road East
Puyallup, Washington
Farallon PN: 2220-008

Location	Total Well Depth (feet bgs)[1]	Screened Interval (feet bgs)[1]	Top of Casing Elevation (feet NAVD88)[2]	Monitoring Date	Depth to Water (feet)[3]	Water Level Elevation (feet NAVD88)[2]
FMW-01	25.0	15.0 - 25.0	33.57	9/15/2023	15.77	17.80
				2/6/2024	11.79	21.78
				5/16/2024	13.04	20.53
				10/24/2024	15.52	18.05
FMW-02	25.0	15.0 - 25.0	34.24	9/15/2023	16.94	17.30
				2/6/2024	12.53	21.71
				5/16/2024	13.75	20.49
				10/24/2024	16.25	17.99
FMW-03	25.0	15.0 - 25.0	33.63	9/15/2023	16.77	16.86
				2/6/2024	12.69	20.94
				5/16/2024	14.19	19.44
				10/24/2024	16.69	16.94
FMW-04	25.0	15.0 - 25.0	31.90	9/15/2023	15.43	16.47
				2/6/2024	11.12	20.78
				5/16/2024	13.05	18.85
				10/24/2024	15.42	16.48
FMW-05	20.0	10.0 - 20.0	33.75	9/15/2023	17.37	16.38
				2/6/2024	13.57	20.18
				5/16/2024	14.94	18.81
				10/24/2024	17.37	16.38

Notes:

[1] In feet below ground surface.

[2] In feet above mean sea level.

[3] In feet below top of well casing.

bgs = below ground surface

NAVD88 = North American Vertical Datum of 1988

Table 2
Soil Analytical Results for TPH and BTEX
7602 and 7702 River Road East
Puyallup, Washington
Farallon PN: 2220-008

Sample Location	Sampled By	Sample Identification	Sample Depth (feet)[1]	Sample Date	Analytical Results (milligrams per kilogram)						
					DRO[2]	ORO[2]	GRO[3]	Benzene[4]	Toluene[4]	Ethylbenzene[4]	Xylenes[4]
B1	BBG	B1-S1-8	8.0	9/28/2022	< 5.10	< 12.7	15.0	< 0.00159	< 0.00797	< 0.00399	< 0.0104
B2	BBG	B2-S1-4	4.0	9/28/2022	< 4.29	14.6	< 3.27	< 0.00131	< 0.00657	< 0.00329	< 0.00854
	BBG	B2-S2-7	7.0	9/28/2022	24.2	152	< 3.32	< 0.00134	< 0.00671	< 0.00335	< 0.00872
B3	BBG	B3-S1-16	16.0	9/28/2022	< 4.99	< 12.5	< 3.81	< 0.00153	< 0.00766	< 0.00383	< 0.00996
B4	BBG	B4-S1-16	16.0	9/28/2022	35.5	29.8	< 4.28	< 0.00186	< 0.00929	< 0.00466	< 0.0121
B5	BBG	B5-S1-8	8.0	9/28/2022	< 4.24	< 10.6	< 2.82	< 0.00112	< 0.00562	< 0.00281	< 0.00731
FB-1	Farallon	FB-1-25.0	25.0	8/17/2023	< 50	< 250	< 5	< 0.001	< 0.01	< 0.001	< 0.003
FB-2	Farallon	FB-2-25.0	25.0	8/17/2023	< 50	< 250	< 25	< 0.001	< 0.01	< 0.001	0.0023
FB-3	Farallon	FB-3-23.0	23.0	8/17/2023	< 50	< 250	< 5	0.0020	< 0.01	0.0014	0.0150
FMW-01	Farallon	FMW-01-21.5	21.5	9/11/2023	< 50	< 250	---	---	---	---	---
FMW-02	Farallon	FMW-02-17.5	17.5	9/11/2023	< 50	< 250	---	---	---	---	---
FMW-03	Farallon	FMW-03-17.0	17.0	9/12/2023	< 50	< 250	---	---	---	---	---
FMW-04	Farallon	FMW-04-21.5	21.5	9/11/2023	< 50	< 250	---	---	---	---	---
FMW-05	Farallon	FMW-05-12.5	12.5	9/12/2023	< 50	< 250	---	---	---	---	---
FMW-06	Farallon	FMW-06-17.5	17.5	9/12/2023	< 50	< 250	---	---	---	---	---
MTCA Method A Cleanup Levels for Soil[5]					**2,000**	**2,000**	**30/100[6]**	**0.03**	**7**	**6**	**9**

NOTES:

< denotes analyte not detected at or exceeding the laboratory reporting limit listed.

— denotes sample not analyzed.

[1]Depth in feet below ground surface.

[2]Analyzed by Northwest Method NWTPH-Dx.

[3]Analyzed by Northwest Method NWTPH-Gx.

[4]Analyzed by U.S. Environmental Protection Agency Method 8260D.

[5]Washington State Model Toxics Control Act Cleanup Regulation (MTCA) Method A Soil Cleanup Levels for Unrestricted Land Uses, Table 740-1 of Section 900 of Chapter 173-340 of the Washington Administrative Code, as revised 2013.

[6]Cleanup level is 30 milligrams per kilogram if benzene is detected and 100 milligrams per kilogram if benzene is not detected.

BBG = BBG Assessments, LLC

BTEX = benzene, toluene, ethylbenzene and xylenes

DRO = total petroleum hydrocarbons (TPH) as diesel-range organics

Farallon = Farallon Consulting, L.L.C.

GRO = TPH as gasoline-range organics

ORO = TPH as oil-range organics

Table 3
Soil Analytical Results for Halogenated VOCs
7602 and 7702 River Road East
Puyallup, Washington
Farallon PN: 2220-008

Sample Location	Sampled By	Sample Identification	Sample Depth (feet)[1]	Sample Date	Analytical Results (milligrams per kilogram)[2]				
					PCE	TCE	cis-1,2-Dichloroethene	trans-1,2-Dichloroethene	Vinyl Chloride
B1	BBG	B1-S1-8	8.0	9/28/2022	< 0.00399	< 0.00159	< 0.00399	< 0.00797	< 0.00399
B2	BBG	B2-S1-4	4.0	9/28/2022	< 0.00329	< 0.00131	< 0.00329	< 0.00657	< 0.00329
	BBG	B2-S2-7	7.0	9/28/2022	< 0.00335	< 0.00134	< 0.00335	< 0.00671	< 0.00335
B3	BBG	B3-S1-16	16.0	9/28/2022	< 0.00383	< 0.00153	< 0.00383	< 0.00766	< 0.00383
B4	BBG	B4-S1-16	16.0	9/28/2022	< 0.00466	< 0.00186	< 0.00466	< 0.00929	< 0.00466
B5	BBG	B5-S1-8	8.0	9/28/2022	< 0.00281	< 0.00112	< 0.00281	< 0.00562	< 0.00281
FB-1	Farallon	FB-1-25.0	25.0	8/17/2023	< 0.002	< 0.002	< 0.002	< 0.002	< 0.002
FB-2	Farallon	FB-2-25.0	25.0	8/17/2023	< 0.002	< 0.002	< 0.002	< 0.002	< 0.002
FB-3	Farallon	FB-3-23.0	23.0	8/17/2023	< 0.002	< 0.002	< 0.002	< 0.002	< 0.002
MTCA Cleanup Levels for Soil[3]					**0.05**	**0.03**	**160[4]**	**1,600[4]**	**0.67[4]**
MTCA Method B Cleanup Levels for Soil Protective of Groundwater Vadose @ 13 Degrees Celsius[4]					**0.05**	**0.025**	**0.079**	**0.52**	**0.0017**
MTCA Method B Cleanup Levels for Soil Protective of Groundwater Saturated[4]					**0.0028**	**0.0015**	**0.0052**	**0.032**	**0.00009**

NOTES:

< denotes analyte not detected at or exceeding the reporting limit listed.

[1]Depth in feet below ground surface.

[2]Analyzed by U.S. Environmental Protection Agency Method 8260D.

[3]Washington State Model Toxics Control Act Cleanup Regulation (MTCA) Method A Soil Cleanup Levels for Unrestricted Land Uses, Table 740-1 of Section 900 of Chapter 173-340 of the Washington Administrative Code, as revised 2013, unless otherwise noted.

[4]Washington State Cleanup Levels and Risk Calculations (CLARC) under Washington State MTCA, Standard Method B Formula Values for Soil from CLARC Master spreadsheet, https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Contamination-clean-up-tools/CLARC

BBG = BBG Assessments, LLC
Farallon = Farallon Consulting, L.L.C.
PCE = tetrachloroethene
TCE = trichloroethene
VOC = volatile organic compound

Table 4
Soil Analytical Results for PAHs
7602 and 7702 River Road East
Puyallup, Washington
Farallon PN: 2220-008

Sample Location	Sampled By	Sample Identification	Sample Depth (feet)[1]	Sample Date	Analytical Results (milligrams per kilogram)[2]																	
					Non-Carcinogenic PAHs											Carcinogenic PAHs							
					Naphthalene	1-Methylnaphthalene	2-Methylnaphthalene	Total Naphthalenes[3]	Acenaphthene	Acenaphthylene	Anthracene	Benzo(g,h,i)Perylene	Fluoranthene	Fluorene	Phenanthrene	Pyrene	Benzo(a)Pyrene	Benzo(a)Anthracene	Benzo(b)Fluoranthene	Benzo(k)Fluoranthene	Chrysene	Dibenzo(a,h)Anthracene	Indeno(1,2,3-cd)Pyrene	Total cPAHs TEC[4,5]
B1	BBG	B1-S1-8	8.0	9/28/2022	< 0.0255	< 0.0255	< 0.0255	< 0.0765	< 0.00765	< 0.00765	< 0.00765	< 0.00765	< 0.00765	< 0.00765	0.0134	< 0.00765	< 0.00765	< 0.00765	< 0.00765	< 0.00765	< 0.00765	< 0.00765	< 0.00765	< 0.0058
B2	BBG	B2-S1-4	4.0	9/28/2022	< 0.0214	< 0.0214	< 0.0214	< 0.0642	< 0.00643	< 0.00643	< 0.00643	< 0.00643	< 0.00643	< 0.00643	< 0.00643	< 0.00643	< 0.00643	< 0.00643	< 0.00643	< 0.00643	< 0.00643	< 0.00643	< 0.00643	< 0.0049
	BBG	B2-S2-7	7.0	9/28/2022	< 0.0215	< 0.0215	< 0.0215	< 0.0645	< 0.00646	< 0.00646	< 0.00646	< 0.00646	< 0.00646	< 0.00646	< 0.00646	< 0.00646	< 0.00646	< 0.00646	< 0.00646	< 0.00646	< 0.00646	< 0.00646	< 0.00646	< 0.0049
B3	BBG	B3-S1-16	16.0	9/28/2022	< 0.0250	< 0.0250	< 0.0250	< 0.0750	< 0.00749	< 0.00749	< 0.00749	< 0.00749	< 0.00749	< 0.00749	< 0.00749	< 0.00749	< 0.00749	< 0.00749	< 0.00749	< 0.00749	< 0.00749	< 0.00749	< 0.00749	< 0.0057
B4	BBG	B4-S1-16	16.0	9/28/2022	0.0288	0.0558	0.0787	0.1633	< 0.00798	< 0.00798	< 0.00798	< 0.00798	0.0131	0.00804	0.0697	0.0126	< 0.00798	0.0115	< 0.00798	< 0.00798	0.0193	< 0.00798	< 0.00798	0.0069
B5	BBG	B5-S1-8	8.0	9/28/2022	< 0.0212	< 0.0212	< 0.0212	< 0.0636	< 0.00637	< 0.00637	< 0.00637	< 0.00637	< 0.00637	< 0.00637	< 0.00637	< 0.00637	< 0.00637	< 0.00637	< 0.00637	< 0.00637	< 0.00637	< 0.00637	< 0.00637	< 0.0048
FB-1	Farallon	FB-1-25.0	25.0	8/17/2023	< 0.01	< 0.01	< 0.01	< 0.03	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.0076
FB-2	Farallon	FB-2-25.0	25.0	8/17/2023	< 0.05	< 0.05	< 0.05	< 0.15	< 0.05	< 0.05	< 0.05	< 0.05	0.050	< 0.05	0.076	0.087	< 0.05	< 0.05	< 0.05	< 0.05	0.079	< 0.05	< 0.05	0.038
FB-3	Farallon	FB-3-23.0	23.0	8/17/2023	0.012	0.023	0.029	0.064	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	0.022	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.0076
MTCA Method A Cleanup Level for Soil [6]								**5**	**4,800[7]**	**NE**	**24,000[7]**	**NE**	**3,200[7]**	**3,200[7]**	**NE**	**2,400[7]**								**0.1**
MTCA Method B Levels for Soil Protective of Groundwater Vadose @ 13 Degrees Celsius[7]					**4.5**	**0.082**	**1.7**	**NE**	**49**	**NE**	**1,100**	**NE**	**630**	**51**	**NE**	**330**								**3.9**
MTCA Method B Levels for Soil Protective of Groundwater Saturated[7]					**0.24**	**0.0042**	**0.088**	**NE**	**2.5**	**NE**	**57**	**NE**	**32**	**2.6**	**NE**	**16**								**0.19**

NOTES:

< denotes analyte not detected at or exceeding the reporting limit listed.

[1]Depth in feet below ground surface.

[2]Analyzed by U.S. Environmental Protection Agency Method 8270E/8270E SIM.

[3]Sum of naphthalene, 1-methylnaphthalene and 2-methylnaphthalene.

[4]Total carcinogenic polycyclic aromatic hydrocarbons derived using the total toxicity equivalency method in Section 708(8) of Chapter 173-340 of the Washington Administrative Code.

[5]For concentrations reported at less than the laboratory reporting limit, half the reporting limit was used to calculate the TEC.

[6]Washington State Model Toxics Control Act Cleanup Regulation (MTCA) Method A Soil Cleanup Levels for Unrestricted Land Uses, Table 740-1 of Section 900 of Chapter 173-340 of the Washington Administrative Code, as revised 2013, unless otherwise noted.

[7]Washington State Cleanup Levels and Risk Calculations (CLARC) under Washington State MTCA, Standard Method B Formula Values for Soil from CLARC Master spreadsheet, https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Contamination-clean-up-tools/CLARC

BBG = BBG Assessments, LLC
cPAHs = carcinogenic polycyclic aromatic hydrocarbons
Farallon = Farallon Consulting, L.L.C.
NE = not established
PAHs = polycyclic aromatic hydrocarbons
TEC = toxic equivalent concentration

Table 5
Soil Analytical Results for Metals
7602 and 7702 River Road East
Puyallup, Washington
Farallon PN: 2220-008

Sample Location	Sample Identification	Sample Depth (feet) [1]	Sample Date	Analytical Results (milligrams per kilogram)[2]							
				Arsenic	Barium	Cadmium	Chromium	Lead	Mercury	Selenium	Silver
FB-1	FB-1-25.0	25.0	8/17/2023	< 1	16.4	< 1	6.32	1.11	< 1	< 1	< 1
FB-2	FB-2-25.0	25.0	8/17/2023	1.02	16.0	< 1	8.34	3.03	< 1	< 1	< 1
FB-3	FB-3-23.0	23.0	8/17/2023	1.85	24.7	< 1	5.03	1.28	< 1	< 1	< 1
FMW-01	FMW-01-21.5	21.5	9/11/2023	< 1	35.5	< 1	12.5	2.15	< 1	< 1	< 1
FMW-02	FMW-02-17.5	17.5	9/11/2023	3.87	53.5	< 1	12.7	3.14	< 1	< 1	< 1
FMW-03	FMW-03-17.0	17.0	9/12/2023	3.01	52.3	< 1	13.9	8.37	< 1	< 1	< 1
FMW-04	FMW-04-21.5	21.5	9/11/2023	3.55	70.1	< 1	14.5	3.88	< 1	< 1	< 1
FMW-05	FMW-05-12.5	12.5	9/12/2023	2.82	29.4	< 1	14.3	6.31	< 1	< 1	< 1
FMW-06	FMW-06-17.5	17.5	9/12/2023	1.71	20.3	< 1	10.0	1.05	< 1	< 1	< 1
MTCA Cleanup Levels for Soil [3]				**20**	**16,000[4]**	**2**	**2,000**	**250**	**2**	**400[4]**	**400[4]**
MTCA Method B Cleanup Levels for Soil Protective of Groundwater Vadose @ 13 Degrees Celsius[5]				**2.9**	**1,600**	**0.69**	**480,000**	**3,000**	**2.1**	**5.20**	**14**
MTCA Method B Cleanup Levels for Soil Protective of Groundwater Saturated[5]				**0.15**	**83**	**0.035**	**24,000**	**150**	**0.10**	**0.26**	**0.69**

NOTES:

< denotes analyte not detected at or exceeding the laboratory reporting limit listed.

[1]Depth in feet below ground surface.

[2]Analyzed by U.S. Environmental Protection Agency Methods 6020B.

[3]Washington State Model Toxics Control Act Cleanup Regulation (MTCA) Method A Soil Cleanup Levels for Unrestricted Land Uses, Table 740-1 of Section 900 of Chapter 173-340 of the Washington Administrative Code, as amended 2013 unless otherwise noted.

[4]Washington State Department of Ecology Cleanup Levels and Risk Calculations, under the Washington State Model Toxics Control Act Cleanup Regulation (MTCA) Standard Method B Formula Values for Soil (Unrestricted Land Use) - Direct Contact (Ingestion Only) and Leaching Pathway, https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Contamination-clean-up-tools/CLARC

[5]Washington State Cleanup Levels and Risk Calculations under the Washington State MTCA, Standard Method B Formula Values for Soil from CLARC Master spreadsheet updated May 2019, https://ecology.wa.gov/Regulations-Permits/Guidance-technical-

Table 6
Groundwater Analytical Results for GRO and BTEX
7602 and 7702 River Road East
Puyallup, Washington
Farallon PN: 2220-008

Sample Location	Sampled By	Sample Date	Sample Identification	Analytical Results (micrograms per liter)				
				NWTPH-Gx[1]	EPA Method 8260D[2]			
				GRO	Benzene	Toluene	Ethylbenzene	Xylenes
Reconnaissance Boring Groundwater Samples								
B1	BBG	9/28/2022	B1-W1	< 100	< 1.00	< 1.00	< 1.00	< 3.00
B3	BBG	9/28/2022	B3-W1	< 100	< 1.00	< 1.00	< 1.00	< 3.00
B4	BBG	9/28/2022	B4-W1	< 100	< 1.00	< 1.00	< 1.00	< 3.00
B5	BBG	9/28/2022	B5-W1	< 100	< 1.00	< 1.00	< 1.00	< 3.00
FB-1	Farallon	8/17/2023	FB-1-081723	< 100	< 0.35	< 1	< 1	< 3
FB-2	Farallon	8/17/2023	FB-2-081723	< 100	< 0.35	< 1	< 1	< 3
FB-3	Farallon	8/17/2023	FB-3-081723	< 100	< 0.35	5.0	< 1	< 3
MTCA Method A Cleanup Level for Groundwater[3]				**800/1,000[4]**	**5**	**1,000**	**700**	**1,000**

NOTES:

< denotes analyte not detected at or above the reporting limit listed.

[1]Analyzed by Northwest Method NWTPH-Gx.

[2]Analyzed by U.S. Environmental Protection Agency Method 8260D.

[3]Washington State Model Toxics Control Act Cleanup Regulation Method A Cleanup Levels for Groundwater, Table 720-1 of Section 900 of Chapter 173-340 of

[4]Cleanup level is 800 micrograms per liter if benzene is detected and 1,000 micrograms per liter if benzene is not detected.

BBG = BBG Assessments, LLC

BTEX = benzene, toluene, ethylbenzene, and xylenes

Farallon = Farallon Consulting, L.L.C.

GRO = total petroleum hydrocarbons (TPH) as gasoline-range organics

Table 7
Groundwater Analytical Results for DRO and ORO with and without Silica Gel Cleanup
7602 and 7702 River Road East
Puyallup, Washington
Farallon PN: 2220-008

Sample Location	Sampled By	Sample Date	Sample Identification	Analytical Results (micrograms per liter)						
				NWTPH-Dx[1]			NWTPH-Dx with Silica Gel[1]			
				DRO	ORO	Total Petroleum + Polar Organics	DRO	ORO	Total Petroleum	Total Polar Organics[2]
Reconnaissance Boring Groundwater Samples										
B1	BBG	9/28/2022	B1-W1	---	---	---	< 200	< 250	< 225	---
B3	BBG	9/28/2022	B3-W1	---	---	---	< 200	< 250	< 225	---
B4	BBG	9/28/2022	B4-W1	---	---	---	< 200	< 250	< 225	---
B5	BBG	9/28/2022	B5-W1	---	---	---	< 200	< 250	< 225	---
FB-1	Farallon	8/17/2023	FB-1-081723	79 x	< 380	269	---	---	---	---
FB-2	Farallon	8/17/2023	FB-2-081723	120	< 300	270	---	---	---	---
FB-3	Farallon	8/17/2023	FB-3-081723	**2,200** x	**7,400**	**9,600**	**700** x	**2,900**	**3,600**	**6,000**
Monitoring Well Groundwater Samples										
Background Monitoring Well										
FMW-01	Farallon	9/15/2023	FMW-01-091523	360 x	450 x	**810**	< 50	< 250	< 150	**810**
	Farallon	2/6/2024	FMW-1-020624	---	---	**710** x	---	---	< 250	**710**
	Farallon	10/24/2024	FMW-01-102424	250 x	< 250	375	< 50	< 250	< 150	375
Existing Monitoring Wells										
FMW-02	Farallon	9/15/2023	FMW-02-091523	210 x	330 x	**540**	< 50	< 250	< 150	**540**
	Farallon	2/6/2024	FMW-2-020624	---	---	260 x	---	---	< 250	260
	Farallon	10/24/2024	FMW-02-102424	200 x	< 250	325	< 50	< 250	< 150	325
FMW-03	Farallon	9/15/2023	FMW-03-091523	**750** x	**2,200** x	**2,950**	< 50	< 250	< 150	**2,950**
	Farallon	2/6/2024	FMW-3-020624	**---**	**---**	**1,900** x	---	---	< 250	**1,900**
	Farallon	10/24/2024	FMW-03-102424	**860** x	**670** x	**1,530**	< 60	< 300	< 180	**1,530**
FMW-04	Farallon	9/15/2023	FMW-04-091523	260 x	**660** x	**920**	< 50	< 250	< 150	**920**
	Farallon	2/6/2024	FMW-4-020624	---	---	< 250	---	---	< 250	< 250
	Farallon	10/24/2024	FMW-04-102424	190 x	< 250	315	< 50	< 250	< 150	315
FMW-05	Farallon	9/15/2023	FMW-05-091523	180 x	370 x	**550**	< 50	< 250	< 150	**550**
	Farallon	2/6/2024	FMW-5-020624	**---**	**---**	**1,400** x	---	---	< 250	**1,400**
	Farallon	10/24/2024	FMW-05-102424	170 x	< 250	295	< 50	< 250	< 150	295
MTCA Method A Cleanup Level for Groundwater[3]				**500**	**500**	**500**	**500**	**500**	**500**	**500**

NOTES:

Results in **bold** denote concentrations exceeding screening levels prior to background adjustments.
Results in **bold** and highlighted yellow denote concentrations exceeding applicable cleanup levels.
< denotes analyte not detected at or above the reporting limit listed.
— denotes sample not analyzed or not applicable.

[1]Analyzed by Northwest Method NWTPH-Dx or NWTPH-Dx treated with a silica gel cleanup procedure prior to analysis. Total petroleum values for 2023 and October 2024 samples are the sum of DRO and ORO, using half of the reporting limit in the summation for non-detect results. Total petroleum values for February 2024 samples were quantified by the laboratory as a hydrocarbon range of C10 to C36 (diesel and oil ranges).

[2]Total Polar Organics is calculated by subtracting "Total Petroleum" from "Total Petroleum + Polar Organics".

[3]Washington State Model Toxics Control Act Cleanup Regulation Method A Cleanup Levels for Groundwater, Table 720-1 of Section 900 of Chapter 173-340 of the Washington Administrative Code, as amended 2013.

BBG = BBG Assessments, LLC
DRO = total petroleum hydrocarbons (TPH) as diesel-range organics
Farallon = Farallon Consulting, L.L.C.
NA = not applicable
NE = not established
ORO = TPH as oil-range organics
x = the sample chromatographic pattern does not resemble the fuel standard used for quantitation

Table 8
Groundwater Analytical Results for Metals
7602 and 7702 River Road East
Puyallup, Washington
Farallon PN: 2220-008

Sample Location	Sample Date	Sample Identification	Analytical Results (micrograms per liter)[1]															
			Total Arsenic	Dissolved Arsenic	Total Barium	Dissolved Barium	Total Cadmium	Dissolved Cadmium	Total Chromium	Dissolved Chromium	Total Lead	Dissolved Lead	Total Mercury	Dissolved Mercury	Total Selenium	Dissolved Selenium	Total Silver	Dissolved Silver
Reconnaissance Boring Groundwater Samples																		
FB-1	8/17/2023	FB-1-081723	**16.4**	**10.5**	171	118	< 1	< 1	< 5	< 10	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1
FB-2	8/17/2023	FB-2-081723	3.09	2.30	71.7	73.4	< 1	< 1	1.54	4.48	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1
FB-3	8/17/2023	FB-3-081723	**10.9**	**12.3**	177	196	< 1	< 1	< 5	1.66	< 1	1.20	< 1	< 1	< 1	< 1	< 1	< 1
Monitoring Well Groundwater Samples																		
FMW-01	9/15/2023	FMW-01-091523	**59.7**	**59.3**	592	576	< 1	< 1	< 20	< 20	1.05	< 1	< 1	< 1	< 1	< 1	< 1	< 1
	2/6/2024	FMW-1-020624	**25**	2.7	---	---	---	---	---	---	---	---	---	---	---	---	---	---
	10/24/2024	FMW-01-102424	**32**	**31**	---	---	---	---	---	---	---	---	---	---	---	---	---	---
FMW-02	9/15/2023	FMW-02-091523	**22.5**	**22.2**	394	383	< 1	< 1	< 20	< 20	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1
	2/6/2024	FMW-2-020624	2.5	1.5	---	---	---	---	---	---	---	---	---	---	---	---	---	---
	10/24/2024	FMW-02-102424	6.1	5.5	---	---	---	---	---	---	---	---	---	---	---	---	---	---
FMW-03	9/15/2023	FMW-03-091523	**8.36**	7.91	54.1	50.7	< 1	< 1	< 10	< 10	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1
	2/6/2024	FMW-3-020624	**8.4**	6.3	---	---	---	---	---	---	---	---	---	---	---	---	---	---
	10/24/2024	FMW-03-102424	7.3	7.3	---	---	---	---	---	---	---	---	---	---	---	---	---	---
FMW-04	9/15/2023	FMW-04-091523	< 1	< 1	58.3	58.1	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1
	2/6/2024	FMW-4-020624	**11**	2.4	---	---	---	---	---	---	---	---	---	---	---	---	---	---
	10/24/2024	FMW-04-102424	7.6	6.6	---	---	---	---	---	---	---	---	---	---	---	---	---	---
FMW-05	9/15/2023	FMW-05-091523	4.64	4.54	98.3	95.8	< 1	< 1	< 10	< 10	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1
	2/6/2024	FMW-5-020624	**8.9**	2.6	---	---	---	---	---	---	---	---	---	---	---	---	---	---
	10/24/2024	FMW-05-102424	4.8	4.7	---	---	---	---	---	---	---	---	---	---	---	---	---	---
MTCA Cleanup Levels for Groundwater			**8** [2]		**3,200** [3]		**5** [4]		**50** [4]		**15** [4]		**2** [4]		**80** [3]		**80** [3]	

NOTES:
Results in **bold** and highlighted yellow denote concentrations exceeding applicable cleanup levels.
< denotes analyte not detected at or exceeding the reporting limit listed.
--- denotes sample not analyzed.

[1]Analyzed by U.S. Environmental Protection Agency Method 6020B.
[2]Natural background threshold value for the Puget Sound Basin as provided in *Natural Background Groundwater Arsenic Concentrations in Washington State, Study Results* , Washington State Department of Ecology, Publication No. 14-09-044, dated
[3]Washington State Model Toxics Control Act Cleanup Regulation Cleanup Levels and Risk Calculations, Standard Method B Values for Groundwater, https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Contamination-clean-up-tools/CLARC
[4]Washington State Model Toxics Control Act Cleanup Regulation (MTCA) Method A Cleanup Levels for Groundwater, Table 720-1 of Section 900 of Chapter 173-340 of the Washington Administrative Code, as revised 2013.

Table 9
Soil Vapor Analytical Results
7602 and 7702 River Road East
Puyallup, Washington
Farallon PN: 2220-008

Sample Location	Sample Depth (feet)[1]	Sample Date	Depth to Groundwater (feet bgs)	Surface Water Elevation at Puyallup River (feet)	Barometric Pressure (in Hg)	Analytical Results			
						Field Measurements (percent)[2]			
						Methane	Oxygen	Carbon Dioxide	Nitrogen[3]
FMW-01	15.0 - 25.0	9/15/2023	15.74	---	---	12.6	0.0	22.5	64.8
FMW-02	15.0 - 25.0	9/15/2023	16.90	---	---	20.0	0.0	21.9	58.1
FMW-03	15.0 - 25.0	9/15/2023	16.75	---	---	64.1	0.0	41.0	0.0
FMW-04	15.0 - 25.0	9/15/2023	15.34	---	---	68.2	0.0	32.4	0.0
FMW-05	10.0 - 20.0	9/15/2023	17.32	---	---	66.7	0.0	38.0	0.0
	10.0 - 20.0	2/7/2024	13.65	---	---	> 63 E	0.0	38.7	0.0
	10.0 - 20.0	5/16/2024	14.94	---	29.81	> 65.3 E	0.2	35.1	0.0
SG-1	3.0 - 8.0	8/17/2023	---	---	29.83	27.7	0.0	26.0	46.2
SG-2	3.0 - 8.0	8/17/2023	---	---	29.83	27.0	0.0	23.1	49.9
SG-3	3.0 - 8.0	8/17/2023	---	---	29.81	1.6	12.9	4.9	80.5
VP-1	---	2/7/2024	---	---	---	0.1	8.2	7.8	83.9
	---	5/16/2024	---	---	29.81	0.0	3.4	11.9	84.6

NOTES:

[1]Depth in feet below ground surface.

[2]Field methane results obtained using Landtec GEM2000 field instrument.

[3]The nitrogen results were reported as "Balance" on the Landtec GEM2000 field instrument.

--- = not analyzed/not reported/not applicable

bgs = below ground surface

E = beyond calibration range of field instrument

in Hg = inches of mercury

Table 10
Summary of Cleanup Action Alternatives
7602 and 7702 River Road East
Puyallup, Washington
Farallon PN: 2220-008

Target Medium	Area Description	COC	Alternative 1 - Excavation and Disposal	Alternative 2 - Solidification	Alternative 3 - Institutional Controls
Groundwater	Approximate extent of former wood waste landfill	Arsenic, Polar Organics	Excavation, removal, and off-Site disposal of all wood waste, estimated to depths up to 16 feet bgs in the southern portion of the Property and to 11.5 feet bgs in the northern portion of the Property. Includes demolition of structures, abandoning and replacing utilities, temporary dewatering, and excavation of a significant amount of clean wood waste. Assumes a 2-year restoration time frame.	In-situ solidifcation of wood waste with cement to encapsulate the wood waste to decrease the surface area and potential to leach to soil and/or groundwater.The in-situ stabilization would be conducted using excavation equipment to depths up to 16 feet bgs. Engineered and institutional controls would be required. Assumes a 5-year restoration time frame.	Institutional controls to protect against exposure to groundwater at the Site and groundwater monitoring to ensure that contaminated groundwater remains stable beneath the Property. Limits activities that could expose, extract, or disturb wood waste or contaminated groundwater. Assumes a 10-year restoration time frame.

NOTES:
COCs = constituents of concern
bgs = below ground surface

Table 11
Cleanup Action Alternative Cost Summary
7602 and 7702 River Road East
Puyallup, Washington
Farallon PN: 2220-008

		Alternative 1 - Excavation and Disposal	Alternative 2 - Solidification	Alternative 3 - Institutional Controls
CONSTRUCTION AND REMEDIATION COSTS				
Construction and Remediation				
	Site Preparation	$150,000	$350,000	$0
	Excavation and Disposal	$3,600,000	$225,000	$0
	Temporary Excavation Dewatering	$35,000	$0	$0
	Excavation Backfill	$5,250,000	$0	$0
	Solidification	$0	$15,000,000	$0
	Site Restoration	$1,000,000	$1,000,000	$0
	Record Environmental Covenant	$0	$10,000	$10,000
	Subtotal Construction and Remediation	$10,035,000	$16,585,000	$10,000
Contingency and Taxes				
	Contingency Percent	20%	20%	20%
	Contingency Total	$2,007,000	$3,317,000	$2,000
	Subtotal Contingency and Construction and Remediation	$12,042,000	$19,902,000	$12,000
	Washington and Local Sales Tax (6.5% + 3.6%)	$1,216,000	$2,010,000	$1,000
	Total Construction and Remediation Cost	**$13,258,000**	**$21,912,000**	**$13,000**
ENGINEERING COSTS				
	Project Management (1% to 2% total Construction costs)	$150,000	$150,000	$1,000
	Remedial Design, Permitting, Engineering Control Monitoring Plan (1% to 6% total Construction costs)	$600,000	$300,000	$0
	Construction Management (1% to 2% total Construction costs)	$200,000	$250,000	$0
	Implementation, Field Observation	$500,000	$500,000	$0
	Subtotal Engineering and Project Management	**$1,450,000**	**$1,200,000**	**$1,000**
TOTAL CAPITAL COST		**$14,708,000**	**$23,112,000**	**$14,000**
ONGOING PERIODIC AND FUTURE COSTS[1]				
	Performance Groundwater Monitoring and Reporting (Alt 1: 1 year; Alt 2: 5 years; Alt 3: 10 years;)	$15,000	$75,000	$150,000
	Ecology PPCD 5-Year Review	$0	$5,000	$10,000
	Cleanup Action Report	$45,000	$45,000	$5,000
TOTAL ONGOING PERIODIC and FUTURE COST		**$60,000**	**$125,000**	**$165,000**
CLEANUP ALTERNATIVE TOTAL COST		**$14,768,000**	**$23,237,000**	**$179,000**

NOTES:

Cost Estimating References:
A Guide to Developing and Documenting Cost Estimates During the Feasibility Study dated July 2000, prepared by the U.S. Environmental Protection Agency.

Table 12
Evaluation of Cleanup Action Alternatives
7602 and 7702 River Road East
Puyallup, Washington
Farallon PN: 2220-008

	Alternative 1 - Excavation and Disposal	Alternative 2 - Solidification	Alternative 3 - Institutional Controls
Description	Excavation, removal, and off-Site disposal of all wood waste, estimated to depths up to 16 feet bgs in the southern portion of the Property and to 11.5 feet bgs in the northern portion of the Property. Includes demolition of structures, abandoning and replacing utilities, temporary dewatering, and excavation of a significant amount of clean wood waste. Assumes a 2-year restoration time frame.	In-situ solidifcation of wood waste with cement to encapsulate the wood waste to decrease the surface area and potential to leach to soil and/or groundwater.The in-situ stabilization would be conducted using excavation equipment to depths up to 16 feet bgs. Engineered and institutional controls would be required. Assumes a 5-year restoration time frame.	Institutional controls to protect against exposure to groundwater at the Site and groundwater monitoring to ensure that contaminated groundwater remains stable beneath the Property. Limits activities that could expose, extract, or disturb wood waste or contaminated groundwater. Assumes a 5-year restoration time frame.
MTCA Requirements			
Protection of Human Health and the Environment	Yes - Alternative will protect human health and the environment.	Yes - Alternative will protect human health and the environment.	Yes - Alternative will protect human health and the environment.
Compliance with Cleanup Standards	Yes - Cleanup levels will be met throughout the Site in the shortest restoration timeframe.	Yes - Cleanup levels will be met throughout the Site within a reasonable restoration timeframe.	Yes - Cleanup levels will be met throughout the Site within a reasonable restoration timeframe.
Prevention or Minimize Releases and Migration of Hazardous Substances	Yes - Alternative will eliminate releases and migration of hazardous substances.	Yes - Alternative will minimize releases and migration of hazardous substances.	Yes - Alternative will minimize releases and migration of hazardous substances.
Compliance with Applicable State and Federal Laws	Yes - Alternative complies with applicable laws.	Yes - Alternative complies with applicable laws.	Yes - Alternative complies with applicable laws.
Provision for Compliance Monitoring	Yes - Alternative includes provisions for compliance monitoring (i.e., groundwater monitoring).	Yes - Alternative includes provisions for compliance monitoring (i.e., groundwater monitoring).	Yes - Alternative includes provisions for compliance monitoring (i.e., groundwater monitoring).
Permanent to the Maximum Extent Practicable (see detail below)	Yes - Removal of soil in areas of COCs exceeding applicable cleanup levels will result in a permanent solution for the Site.	Yes - Solidification will result in a permanent solution for the Site.	Yes - Insitrutional controls will ensure that the impacted groundwater remains beneath the Property.
Reasonable Restoration Time Frame	Yes - Restoration time frame is reasonable and likely within 2 years from source removal and compliance groundwater monitoring.	Yes - Restoration time frame is reasonable and likely within 5 years.	Yes - Restoration time frame is reasonable and likely within 10 years.

Table 12
Evaluation of Cleanup Action Alternatives
7602 and 7702 River Road East
Puyallup, Washington
Farallon PN: 2220-008

	Alternative 1 - Excavation and Disposal	Alternative 2 - Solidification	Alternative 3 - Institutional Controls
Evaluation Criteria for Permanence to the Maximum Extent Practicable[1]			
Protectiveness (30% weighting factor)	Alternative would achieve overall protection of human health and the environment. However, contaminated soil would be placed in a regulated landfill and is not permanently destroyed. = 9	Alternative would achieve overall protection of human health and the environment within a reasonable resotration timeframe. However, contamination would not be destroyerd and would remain beneath the Property. = 7	Alternative would achieve overall protection of human health and the environment within a reasonable resotration timeframe.. = 6
Permanence (20% weighting factor)	The alternative is permanent and achieves the cleanup standards. = 10	The alternative is permanent and achieves the cleanup standards. However, the remedy does not destroy the contaminants as they will be contained. = 9	The alternative is permanent and achieves the cleanup standards in a slightly longer restoration timeframe. = 8
Long-Term Effectiveness (20% weighting factor)	Complete soil excavation and disposal is a proven remedial technology at a variety of sites. However, contaminated soil would be placed in a regulated landfill and is not permanently destroyed. = 8	Solidification would immobilize contamination. However, the success of solidification is depedent on multiple factors some of which are dependent on subsurface conditions. = 9	Insitutional controls would affectively manage the remaining contamination at the site. = 5
Short-Term Risk Management (10% weighting factor)	There would be increased risk to human health and the environment. Extensive excavation would impact the neighborhood and the public for a prolonged period of time. = 3	There would be increased risk to human health and the environment. Extensive excavation would impact the neighborhood and the public for a prolonged period of time. = 4	There would be limited risk to human health and the environment. = 8
Implementability (10% weighting factor)	Excavation would require siginificant planning and oversight to implement. Would require significant coordination with multiple stakeholders. = 2	Excavation would require siginificant planning and oversight to implement. Would require significant coordination with multiple stakeholders. Success of the alternative is unknown. = 2	Implementation is simple and could be implemented immediately. = 10

Table 12
Evaluation of Cleanup Action Alternatives
7602 and 7702 River Road East
Puyallup, Washington
Farallon PN: 2220-008

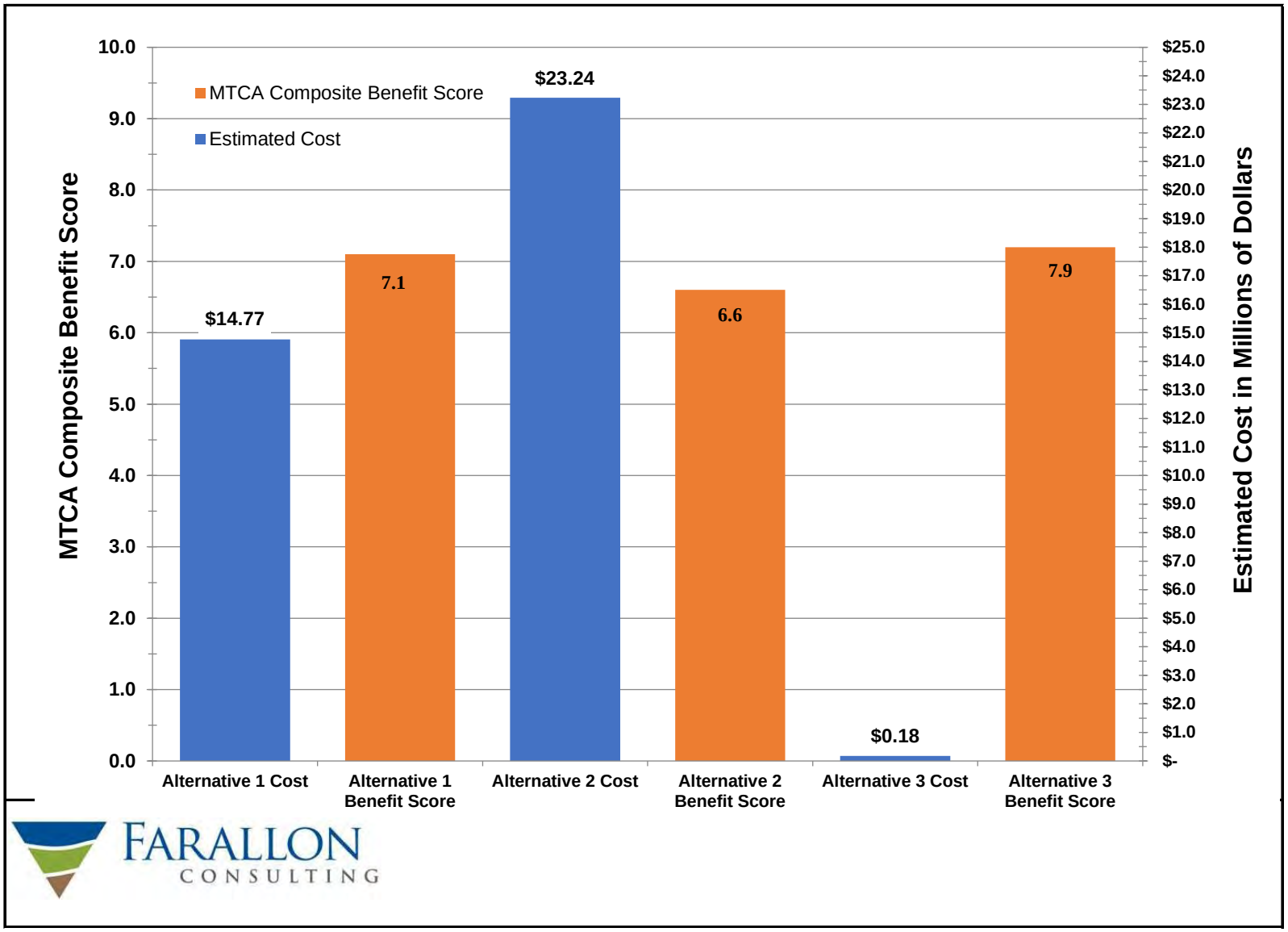
	Alternative 1 - Excavation and Disposal	Alternative 2 - Solidification	Alternative 3 - Institutional Controls
Public Concerns (10% weighting factor)	Excavation would signicicantly impact the general public. There would be increased emmissions and noise from trucks and construction equipment. Active construction time for the alternative is high. = 3	Solidification would signicicantly impact the general public. There would be increased emmissions and noise from trucks and construction equipment. Active construction time for the alternative is high. = 3	There would be no construction disturbance at the Site. = 10
MTCA Composite Benefit Score[1]	**7.1**	**6.6**	**7.2**
Overall Alternative Ranking[2]	**2**	**3**	**1**
Cost	**$14,768,000**	**$23,237,000**	**$179,000**

NOTES:

[1] Basis for overall Washington State Model Toxics Control Act Cleanup Regulation (MTCA) Composite Benefit Score provided quantitatively with a score from 1 (least favorable) to 10 (most favorable) for each of the six evaluation criteria for permanence to the Maximum Extent Practicable above. MTCA Composite Benefit Scores were calculated by summing the mathematical product of the score multiplied by the indicated weighting factor for each of the six criteria. The basis for the weighting factors for the six criteria to evaluate permanence to the maximum extent practicable were obtained from the Washington State Department of Ecology guidance cited in Remedial Investigation/Feasibility Study Report text.

[2] Overall Alternative Ranking from 1 (most favorable) to 3 (least favorable).

Chart 1
Disproportionate Cost Analysis Results
7602 and 7702 River Road East
Puyallup, Washington
Farallon PN: 2220-008



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APPENDIX A
METHANE MITIGATION PLAN

FEASIBILITY STUDY AND CLEANUP ACTION PLAN
7602 and 7702 River Road East
Puyallup, Washington

Farallon PN: 2220-008

FARALLON CONSULTING

February 3, 2025

Keith Johnston, R.S.
Tacoma-Pierce County Health Department
3629 South D Street
Tacoma, Washington 98418

RE: METHANE MITIGATION PLAN
EXPRESS STORAGE RIVER ROAD
7602 AND 7702 RIVER ROAD EAST
PUYALLUP, WASHINGTON
FARALLON PN: 2220-008.000

Dear Keith Johnston:

Farallon Consulting, L.L.C. (Farallon) has prepared this letter to provide guidance on methane mitigation for the Express Storage River Road property at 7602 and 7702 River Road East in Puyallup, Washington (herein referred to as the Property) (Figure 1).

The Property consists of Pierce County Parcel Nos. 0420202079, 0420202080, and 0420202081, which total 7.67 acres of land developed with two general areas of operation (Figure 2). The northwestern portion of the Property, comprising Pierce County Parcel No. 0420202079, is developed with a used car sales lot. The central and southern portions of the Property, comprising Pierce County Parcel Nos. 0420202080 and 0420202081, are developed with a public self-storage facility known as Puyallup River Self Storage.

Historical operations included an unpermitted wood waste landfill, known as the Corliss Wood Waste Landfill, which formerly operated on the Property from approximately May 1974 through November 1976. In 1974, the wood waste landfill caught fire and local agencies directed wood waste landfill activities to cease. The approximate extent of the former wood waste landfill is shown on Figure 2.

PRIOR ENVIRONMENTAL INVESTIGATIONS

A remedial investigation was conducted by Farallon and others in multiple phases between 2016 and 2024 to evaluate whether current and/or historical operations resulted in the release of hazardous substances and to adequately characterize those hazardous substances. Based on the results of the remedial investigation, dissolved arsenic was the only hazardous substance detected at concentrations exceeding the Washington State Model Toxics Control Act Cleanup Regulation (MTCA) cleanup level in groundwater. The Site,

as defined by MTCA, comprises the area dissolved arsenic has come to be located in groundwater at concentrations exceeding MTCA cleanup levels. The Site currently is enrolled in the Washington State Department of Ecology (Ecology) Expedited Voluntary Cleanup Program (VCP) under VCP Project ID XS0018.

Between August 2023 and October 2024, Farallon conducted further investigation at the Property, which included advancing a total of nine borings, collecting soil and reconnaissance groundwater samples, and installing five monitoring wells. Multiple sampling points were used to evaluate methane concentrations, including temporary soil gas monitoring points, monitoring wells, and a soil gas vapor pin. Farallon conducted groundwater and methane monitoring events in September 2023, February 2024, May 2024, and October 2024.

Methane concentrations have exceeded the lower explosive limit (LEL) in seven of the nine soil gas sampling points. All of the detections were in soil gas sampling points located within untreated wood waste in the former landfill. Methane was not detected in the soil gas sampling point on the used car sales lot adjacent to the untreated wood waste in the former landfill, which demonstrates that the methane has not migrated from the former landfill into the buildings on the Property. Based on these data, the untreated wood waste was determined to be producing methane gas within the former wood waste landfill. .

REGULATORY FRAMEWORK

Ecology considers methane to be an Applicable or Relevant and Appropriate Requirement (ARAR) since methane can be an explosivity concern at a site. MTCA focuses on potential chronic health and environment-related concerns from hazardous substances; however, as an ARAR, methane concerns still need to be appropriately addressed. Since the Site is not a permitted disposal facility and no municipal solid waste has been disposed of at the Site, solid waste regulations are not directly applicable. Ecology considers methane at non-solid waste facilities to be the responsibility of an appropriate local entity. At this Site, since no redevelopment is planned that would trigger a SEPA review, there are no specific local regulations or requirements that are triggered.

Currently there are no redevelopment plans for the Property and methane mitigation is not required under current operations. The Property will continue to be used as a storage lot with a used car sales lot on the northwestern portion of the Property. If redevelopment

occurs in the future, Farallon would recommend the following as potential methane mitigation measures to protect future occupants of the Property.

POTENTIAL MITIGATION MEASURES

The following section provides potential methane mitigation measures that could be implemented if the Property is redeveloped in the future. Specific methane mitigation measures would be dependent on future redevelopment plans and/or operations.

VAPOR BARRIER MITIGATION SYSTEM

A vapor barrier mitigation system would eliminate the risk of exposure to methane vapor intrusion to indoor air. A vapor barrier system design is typically comprised of a 20-mil high-density polyethylene liner extending under horizontal foundation slabs of potential future building(s). The 20-mil Drago Wrap Soil Gas Barrier from Stego Industries, LLC, of San Clemente, California or approved equivalent is recommended. The vapor barrier is a multi-layered plastic extrusion that meets the standards of ASTM E1745 for water vapor retarders in contact with soil or granular fill under concrete slabs. Any installation of a vapor barrier would require documentation of quality assurance/quality control to ensure installation was completed in accordance with manufacturer's specifications.

PASSIVE SUBSLAB DEPRESSURIZATION SYSTEM

A subslab depressurization system could be comprised of horizontal and/or vertical ventilation pipes to capture methane gas and vent it to areas outside the building instead of into it. Horizontal ventilation pipes could be installed beneath a building foundation within a network of gravel blankets that would capture methane and vent methane gas to areas around the exterior of the building. Vertical ventilation risers connected to horizontal piping would allow captured methane to migrate around the building instead of into the building. The system would require engineering design to operate specifically to the subsurface conditions at the Property.

ACTIVE VAPOR EXTRACTION

Active vapor extraction would include a network of subslab and ambient air methane gas sensors that would be connected to a main detection system and control panel. Subslab pipes would be mechanically enhanced for the purpose of ventilating the subsurface within a methane zone while a mechanical ambient air ventilation system would reduce

combustibility indoors. The system would be designed to activate subslab and ambient air ventilation systems based on the detected concentrations of methane.

DESIGN/CONSTRUCTION COMPONENTS

Miscellaneous construction components can be used to mitigate methane migration into buildings, including trench dams, special conduits, and cable-seal fittings. Trench dams block the intrusion of methane gas through subsurface utility line trenches such as sewer laterals or water mains. The use of specialized conduits and cable seals can prevent the seepage of methane gas from within utility lines. Engineered details would need to be provided for specialized construction components such as trench dams or conduit seals.

CLOSING

Although there is no requirement for methane mitigation based on the current land use and Property operations, this Methane Mitigation Plan provides potential options for methane mitigation for future land use and redevelopment. If the Property is redeveloped, one or more of these methane mitigation measures can be implemented.

Sincerely,

Farallon Consulting, L.L.C.

Sara Haynes, R.E.P.A.
Associate Environmental Scientist/Engineer

Pete Kingston, L.G.
Principal Geologist

Attachments: Figure 1, *Property Vicinity Map*
Figure 2, *Property Plan*

cc: Frank Winslow, Washington State Department of Ecology
Jason Freise, REDCO Development LLC

SH/PK:cm

LIMITATIONS

The conclusions contained in this report/assessment are based on professional opinions with regard to the subject matter. These opinions have been arrived at in accordance with currently accepted hydrogeologic and engineering standards and practices applicable to this location. The conclusions contained herein are subject to the following inherent limitations:

- Accuracy of Information. Farallon reviewed certain information used in this report/assessment from sources that were believed to be reliable. Farallon's conclusions, opinions, and

recommendations are based in part on such information. Farallon's services did not include verification of its accuracy. Should the information upon which Farallon relied prove to be inaccurate, Farallon may revise its conclusions, opinions, and/or recommendations.

- Reconnaissance and/or Characterization. Farallon performed a reconnaissance and/or characterization of the Site that is the subject of this report/assessment to document current conditions. Farallon focused on areas deemed more likely to exhibit hazardous materials conditions. Contamination may exist in other areas of the Site that were not investigated or were inaccessible. Site activities beyond Farallon's control could change at any time after the completion of this report/assessment.

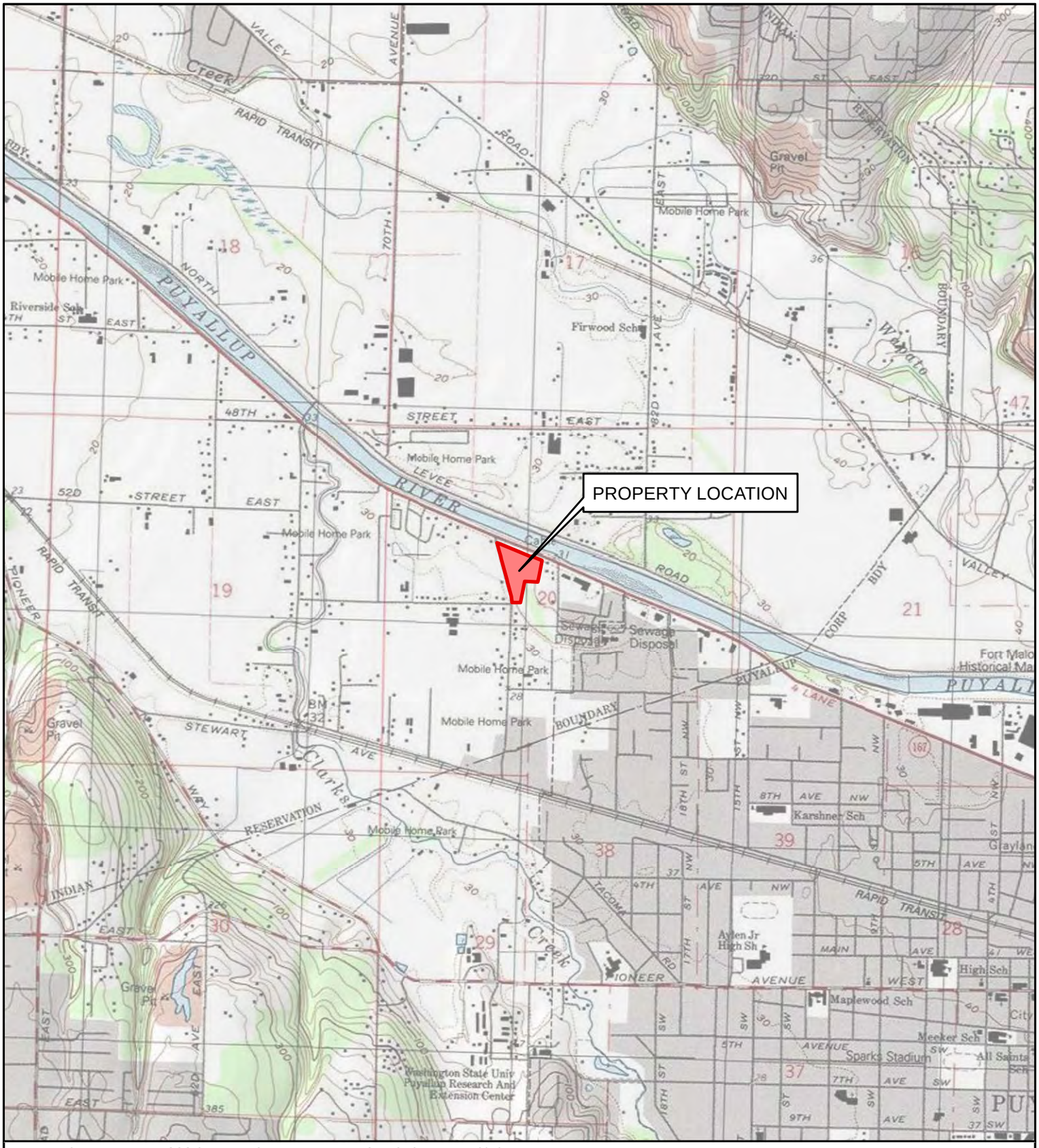
Farallon does not guarantee that the Site is free of hazardous or potentially hazardous substances or conditions, or that latent or undiscovered conditions will not become evident in the future. Farallon's observations, findings, and opinions are as of the date of the report.

This report/assessment has been prepared in accordance with the contract for services between Farallon and REDCO Development LLC. No other warranties, representations, or certifications are made.

FIGURES

METHANE MITIGATION PLAN
7602 and 7702 River Road East
Puyallup, Washington

Farallon PN: 2220-008



REFERENCE: 7.5 MINUTE USGS QUADRANGLE PUYALLUP, WASHINGTON, DATED 2013

0 2,000
SCALE IN FEET

N

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Washington
Issaquah | Bellingham | Seattle

Oregon
Portland | Baker City

California
Oakland | Irvine

FIGURE 1

PROPERTY VICINITY MAP
7602 AND 7702 RIVER ROAD EAST
PUYALLUP, WASHINGTON

FARALLON PN: 2220-008

Drawn By: lmurock | Checked By: PK | Date: 9/26/2023 | Disc Reference:

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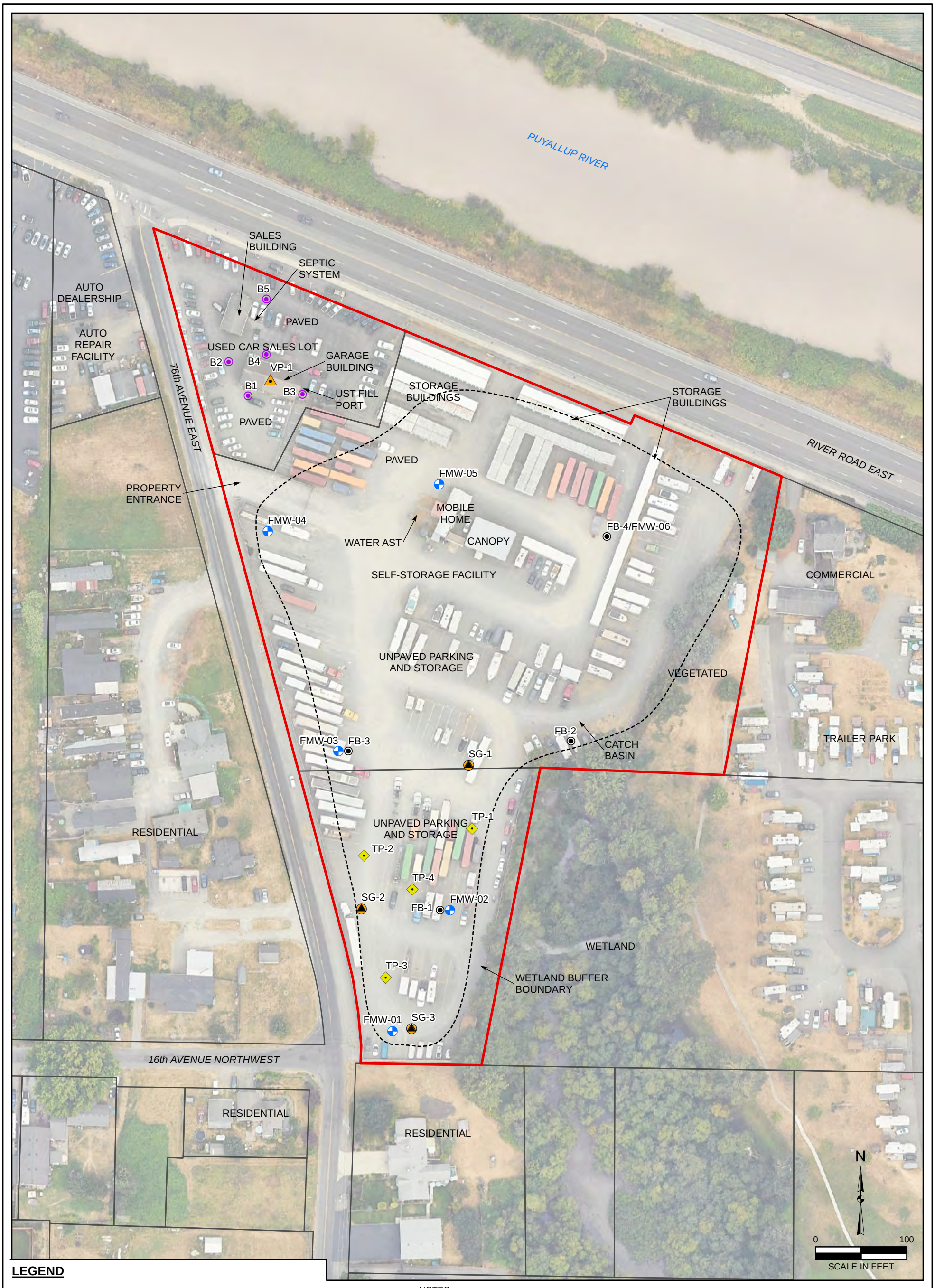

LEGEND

- SOIL VAPOR PROBE (FARALLON, 2024)
- SOIL GAS SAMPLE (FARALLON, 2023)
- BORING (FARALLON, 2023)
- BORING (BBG, 2022)
- MONITORING WELL (FARALLON, 2023)
- TEST PIT (GEOTECHNICAL CONSULTING, 2016)
- APPROXIMATE EXTENT OF FORMER WOOD WASTE LANDFILL
- PROPERTY BOUNDARY
- PIERCE COUNTY PARCEL BOUNDARY

NOTES:
1. ALL LOCATIONS ARE APPROXIMATE.
2. FIGURES WERE PRODUCED IN COLOR. GRAYSCALE COPIES MAY NOT REPRODUCE ALL ORIGINAL INFORMATION.

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Washington
Bellevue | Bellingham | Seattle

Oregon
Portland | Baker City

California
Oakland | Irvine

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FIGURE 2

PROPERTY PLAN
7602 AND 7702 RIVER ROAD EAST
PUYALLUP, WASHINGTON

FARALLON PN: 2220-008

Drawn By: lmurock | Checked By: SH | Date: 1/28/2025 | Disc Reference:

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