

Periodic Review Sound Battery aka Allied Battery Co Inc Tacoma

2310 E 11th St, Tacoma, Pierce County, WA 98421 Facility Site ID: 1247, Cleanup Site ID: 3646

Toxics Cleanup Program, Southwest Region

Washington State Department of Ecology Lacey, Washington

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Document Information

This document is available on the Department of Ecology's <u>Sound Battery aka Allied Battery Co</u> Inc Tacoma cleanup site page.¹

Related Information

- Facility Site ID: 1247
- Cleanup Site ID: 3646

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¹ https://apps.ecology.wa.gov/cleanupsearch/site/3646

² https://ecology.wa.gov/About-us/Who-we-are/Our-Programs/Toxics-Cleanup

³ https://ecology.wa.gov/About-us/Accountability-transparency/Our-website/Accessibility

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Table of Contents

Introduction1
Summary of Site Conditions2
Site description and history2
Site investigations
Cleanup actions
Groundwater monitoring5
Cleanup standards
Environmental Covenant
Periodic Review
Effectiveness of completed cleanup actions7
New scientific information for individual hazardous substances or mixtures present at the Site
New applicable state and federal laws for hazardous substances present at the Site
Current and projected Site and resource uses
Availability and practicability of more permanent remedies
Availability of improved analytical techniques to evaluate compliance with cleanup levels 9
Conclusions9
Next review
References 10
Tables 11
Appendix A. Vicinity Map16
Appendix B. Site Plan 17
Appendix C. Photo Log 19

Introduction

The Washington State Department of Ecology (Ecology) reviewed post-cleanup site conditions and monitoring data to ensure human health and the environment are being protected at the Sound Battery aka Allied Battery Co Inc Tacoma cleanup site (Site). Site cleanup was implemented under the Model Toxics Control Act (MTCA) regulations, Chapter 173-340 Washington Administrative Code (WAC). This is the first periodic review conducted for this Site.

Cleanup activities at this Site were completed under Agreed Order No. DE 01TCPSR-3130, Enforcement Order No. DE 97TC-S137, and the Voluntary Cleanup Program (VCP) under project ID SW1208. Residual concentrations of lead that exceeded MTCA cleanup levels remain on the property in soil. Lead has also been detected in groundwater. The MTCA cleanup levels for soil and groundwater are established under <u>WAC 173-340-740</u>⁴ and <u>WAC 173-340-720</u>,⁵ respectively (Table 1).

Ecology determined institutional controls in the form of an environmental covenant would be required as part of the cleanup action for the Site. <u>WAC 173-340-420(2)</u>⁶ requires Ecology to conduct a periodic review of certain sites every five years. For this Site, a periodic review is required because Ecology issued a no further action (NFA) opinion at the Site and institutional controls were required as part of the cleanup action.

When evaluating whether human health and the environment are being protected, Ecology must consider the following factors (WAC 173-340-420(4)):

- a) The effectiveness of ongoing or completed cleanup actions, including the effectiveness of engineered controls and institutional controls in limiting exposure to hazardous substances remaining at the site;
- b) New scientific information for individual hazardous substances or mixtures present at the site;
- c) New applicable state and federal laws for hazardous substances present at the site;
- d) Current and projected site and resource uses;
- e) The availability and practicability of more permanent remedies; and
- f) The availability of improved analytical techniques to evaluate compliance with cleanup levels.

⁴ https://app.leg.wa.gov/WAC/default.aspx?cite=173-340-740

⁵ https://app.leg.wa.gov/WAC/default.aspx?cite=173-340-720

⁶ https://app.leg.wa.gov/wac/default.aspx?cite=173-340-420

Summary of Site Conditions

Site description and history

The Site is located at 2310 E 11th Street in Tacoma, Pierce County, Washington and consists of one parcel of land (parcel number 2275200770), approximately 0.344 acres in size. The Site was operated as a manufacturing facility for lead-acid storage batteries dating back to 1946. The original building for the manufacturing facility contained approximately 2,450 square feet of space on the northeastern portion of Site and was constructed in the 1940s (Farallon Consulting, L.L.C [Farallon] 2013). In 1960, a 2,450 square foot two-story addition was built (First Addition) and a Second Addition was subsequently constructed including approximately 1,225 square feet of interior space and approximately 1,225 square feet of covered exterior space (Farallon 2013). Following this final addition, the Site consisted of a combined one- and two-story building containing approximately 6,125 square feet of interior space, approximately 1,225 square feet of a roofed exterior area, and paved and gravel parking areas (Farallon 2015). The on-Site building was demolished in 2015 as part of the cleanup actions at the Site (Farallon 2015).

Materials used in the battery manufacturing operation included sulfuric acid, lead, lead oxide, and epoxy. Solid wastes produced during the manufacturing process (lead oxide sludge, scrap, and dross) were transported off Site to a smelter for recycling. Lead oxide wash from the plating machine was recycled on Site. Used batteries received as trade-ins were sent to a recycler.

The business on the Site was operated by Marvin and Glee Dykman between 1978 and 2018. Marvin and Glee Dykman owned the property from 1986 to 2018. In 2018, ownership of the Site was transferred to the Port of Tacoma, who currently owns the Site as of the date of this periodic review. The Site is currently used for storage of semi-trailers.

A vicinity map is in Appendix A, and Site plans are in Appendix B.

Site investigations

Numerous environmental investigations have been conducted at the Site between 1989 and 2013.

In November 1989, Ecology collected soil and water samples at the Site. Results indicated significant lead contamination. One surface water sample collected from a puddle near the end of the roof drain contained total lead at a concentration of 23,600 parts per billion (ppb). Two soil samples contained lead at concentrations of 22 and 471 parts per million (ppm).

In January 1991, Ecology issued an enforcement order requiring a preliminary site assessment focused on investigating both on-Site and off-Site soils for lead contamination. The majority of the samples analyzed exceeded the cleanup level for lead for industrial land use.

In April 1995, Sound Battery submitted a report documenting the extent of lead-contaminated soil beneath a new asphalt area covering the east corner of the Site. The report documented both on-Site and off-Site soil contamination with lead concentrations above the MTCA Method A cleanup level for industrial land use of 1,000 ppm. Lead concentrations in soil up to and across the southeast property boundary onto the adjacent Collins Transport parking property exceeded this cleanup level. Lead contamination was generally found within the top 2 feet of soil.

In 1998, GeoSystems presented the results of a groundwater monitoring event conducted in September 1998 (Farallon 2013). Concentrations of dissolved and total lead in groundwater were below the MTCA Method A cleanup level of 15 micrograms per liter (μ g/L).

In 2000, GeoSystems presented general results of shallow soil sampling (Farallon 2013). Samples were collected in a 10-foot spacing grid pattern with samples collected from depth intervals of 0 to 0.5, 0.5 to 1, 1 to 1.5, and 1.5 to 2 feet. Results found total lead concentrations greater than the MTCA Method A cleanup level for industrial use of 1,000 milligrams per kilogram (mg/kg) in the 0 to 1 foot depth range on the Site. Total lead concentrations on adjacent properties exceeded the MTCA Method A cleanup level for unrestricted land use of 250 mg/kg in the 0 to 1 foot depth range.

In 2000, GeoSystems prepared a feasibility study (FS) report noting that approximately 156 cubic yards of soil was estimated to contain lead on the Site at concentrations exceeding the MTCA Method A cleanup levels for industrial land use (1,000 mg/kg). In addition, an estimated 123 cubic yards of soil immediately adjacent to the Site was estimated to contain lead exceeding the MTCA Method A cleanup level for unrestricted use (250 mg/kg).

In 2002, a cleanup action was implemented at the Site that included excavation of shallow soil in the area around the outside of the Site building and associated paved surfaces. Shallow soil was also excavated from the adjacent land parcels. Approximately 880 tons of soil was treated using a stabilization technology prior to being disposed of off-Site at a Resource Conservation and Recovery Act (RCRA) Subtitle D landfill (Farallon 2013). The Site status was changed to NFA in 2003.

In 2011, EnCo Environmental Corporation (EnCo) conducted a subsurface soil and groundwater investigation at the Site inside and beneath the Site building and associated exterior paved surface in support of a potential real estate transaction. EnCo found concentrations of lead exceeding the MTCA Method A cleanup level for industrial land use. Lead concentrations above the MTCA Method A cleanup level were detected in soils at depths up to 6.3 feet below ground surface (bgs) with concentrations up to 42,300 mg/kg. Groundwater samples were collected from two probed monitoring well locations. Concentrations of total lead in groundwater exceeded the MTCA Method A cleanup level (15 μ g/L) at concentrations of 2,160 and 919 μ g/L. However, results for field filtered samples found dissolved lead at concentrations of 13.1 and 18.9 μ g/L, respectively. A sample of standing water near a drain was also sampled and found to contain dissolved lead at a concentration greater than the MTCA Method A cleanup level. Ecology reopened the Site in February 2012 following a Site Discovery/Release Report and VCP application.

Between 2012 and 2013, a remedial investigation (RI) and focused FS was conducted at the Site by Farallon (Farallon 2013). The RI included advancing eight soil borings up to 9 feet bgs via push-probe drilling techniques, advancing two soil borings up to 3.5 feet bgs using a hand augur, and redeveloping and sampling monitoring wells MW-1 through MW-4. Monitoring well locations are depicted in Figure 1 in Appendix B. In one well, MW-1, total lead was detected above the laboratory limit at 1.3 μ g/L. In all other monitoring wells, total and dissolved lead results were non-detect. The purpose of the soil investigation was to confirm and clarify the estimated extent of total lead concentrations in shallow unsaturated soil beneath the Site building and areas surrounding the Site building. Results for soil confirmed that total lead in shallow soil exceeded the MTCA Method A cleanup level for industrial land use in one boring advanced in the southwest part of the Second Addition of the building and in another boring near the inlet of the abandoned drain line in the southeast corner of the First Addition. The concentrations at these two locations also exceeded the Toxicity Characteristic Leaching Procedure (TCLP) criteria for lead of 5 milligrams per liter (mg/L).

Based on this RI and the results from the 2011 investigation by EnCo, Farallon identified three areas where concentrations of total lead in shallow soil (less than 2 feet bgs) exceeded the MTCA Method A cleanup level for industrial land use. These areas were (1) in the area of the Second Addition of the building, (2) in the central area of the First Addition, and (3) outside the northeast wall of the Site building (Figure 2, Appendix B). In addition, Farallon identified two subareas under the Second Addition where concentrations of total lead in soil exceeded the cleanup level between 2 feet bgs and the depth to groundwater, approximately 6 to 9 feet bgs. The focused FS recommended excavation, on-Site stabilization, and off-Site disposal as the preferred cleanup alternative for the Site.

Cleanup actions

In 2002, under Agreed Order No. DE 01TCPSR-3130 and Enforcement Order No. DE 97TC-S137, soil containing lead at concentrations above the MTCA Method A cleanup level for unrestricted land use (250 mg/kg) was excavated from areas surrounding the Site building footprint and from adjacent properties. Groundwater samples collected at that time did not detect total or dissolved lead in any of the four wells sampled. Following this cleanup action, the Site was removed from the Hazardous Sites List (now referred to as the Contaminated Sites List) and received a NFA status.

As stated in the "Site investigations" section above, an investigation conducted by EnCo in 2011 found lead at concentrations greater than the MTCA Method A cleanup level for industrial land use in soils beneath and adjacent to the building footprint. A sample of standing water near a drain was also sampled and found to contain concentrations of dissolved lead greater than the MTCA Method A cleanup level. The Site was re-opened in 2012 and enrolled in VCP.

In 2014, a Cleanup Action Plan (CAP) was issued by Farallon describing the proposed cleanup action for lead in soil at the Site. The selected cleanup action included excavation, off-Site

stabilization, and off-Site disposal of soil. The CAP required the activities listed below to implement the selected alternative (Farallon 2014):

- Obtain necessary permits and approvals;
- Implement erosion control and Site security measures;
- Demolish the Site building and dispose of waste materials off-Site;
- Mitigate and dispose of hazardous building materials contained in the Site building;
- Remove the concrete floor slab and asphalt pavement in excavation areas;
- Excavate soil with concentrations of lead exceeding the MTCA Method A cleanup level for industrial land use (1,000 mg/kg) from Areas A, A1, A2, B, and C (Figure 2, Appendix B), transport the soil off-Site to a permitted facility for stabilization, and dispose of the stabilized soil at a Subtitle D landfill; and
- Backfill the excavation areas with clean imported fill.

The cleanup actions listed in the 2014 CAP were completed in February of 2015. Approximately 277 tons of soil with lead concentrations exceeding the MTCA Method A cleanup level for industrial land use were removed from the Site in 2015 (Farallon 2015). Between 2000 and 2015, a total of approximately 1,200 tons of soil impacted with lead have been removed and disposed of off-Site (Ecology 2017b).

An NFA opinion letter was issued by Ecology on October 23, 2017. In the letter, Ecology determined that no further remedial action was necessary to cleanup contamination at the Site. This determination was dependent on the continued performance and effectiveness of the post-cleanup controls and monitoring including compliance with the environmental covenant which restricts land use and groundwater use, and performance of confirmation monitoring to confirm the long-term effectiveness of the cleanup action.

Groundwater monitoring

Farallon's Long-Term Groundwater Monitoring Plan (Farallon 2016) required groundwater monitoring every 18 months for a period of 5 years. During each event, groundwater samples were to be collected from four monitoring wells (MW-1, MW-2, MW-3, and MW-4) and analyzed for total and dissolved lead. After completion of groundwater monitoring for 5 years, Ecology was to conduct a periodic review to determine if the groundwater monitoring program can be terminated.

Groundwater monitoring was performed in 2012 prior to implementation of the 2014/2015 cleanup action and then in 2016, 2018, and 2019 following the cleanup action and implementation of the Long-Term Groundwater Monitoring (Farallon 2016). Total and dissolved lead were not detected in any wells in any sampling event after cleanup. In the 2012 monitoring event, total lead was detected in only one well, MW-1, at a concentration below the cleanup level (1.3 μ g/L total lead detected, the cleanup level is 15 μ g/L). Results for total and dissolved lead are summarized in Tables 2 through 5.

Sufficient groundwater compliance monitoring has been conducted to demonstrate that groundwater has not been impacted by lead-contaminated soil remaining on Site above cleanup levels for unrestricted land use. Therefore, Ecology has determined that groundwater monitoring at the Site can be discontinued.

Cleanup standards

Cleanup standards include cleanup levels, the location where these cleanup levels must be met (point of compliance), and any other regulatory requirements that apply to the Site. WAC 173-340-704⁷ states MTCA Method A may be used to establish cleanup levels at sites that have few hazardous substances, are undergoing a routine cleanup action, and where numerical standards are available for all indicator hazardous substances in the media for which the Method A cleanup level is being used. Method B may be used at any site and is the most common method for setting cleanup levels when sites are contaminated with substances not listed under Method A. Method C cleanup levels may be used to set soil and air cleanup levels at industrial sites.

MTCA Method A cleanup levels for industrial land use were determined to be appropriate for contaminants at this Site. The cleanup actions conducted at the Site were determined to be routine, few hazardous substances were found at the Site, and numerical standards were available in the MTCA Method A table for each hazardous substance.

The point of compliance is the area where the cleanup levels must be attained. For soil cleanup levels based on human exposure via direct contact, the standard point of compliance is established as soils throughout the Site from ground surface to 15 feet bgs.

For groundwater, the standard point of compliance is throughout the Site from the uppermost level of the saturated zone extending vertically to the lowest most depth which could potentially be affected by the Site.

Environmental Covenant

Ecology determined that institutional controls would be required as part of the cleanup action to document the remaining contamination, protect the cleanup action, and protect human health and the environment. On February 3, 2017, institutional controls in the form of an <u>environmental covenant</u>⁸ (Covenant) were recorded for the Site.

The Covenant recorded for the Site imposes the following limitations:

 Industrial Land Use. The remedial action for the property is based on a cleanup designed for industrial property. As such, the property shall be used in perpetuity only for industrial uses, as that term is defined in the rules promulgated under Chapter 70.105D RCW. Prohibited uses on the property include but are not limited to residential

⁷ https://app.leg.wa.gov/WAC/default.aspx?cite=173-340-704

⁸ https://apps.ecology.wa.gov/cleanupsearch/document/65463

uses, childcare facilities, K-12 public or private schools, parks, grazing of animals, growing of food crops, and non-industrial commercial uses.

- 2. **Groundwater Use.** The groundwater beneath the property shall not be extracted for any purpose other than temporary construction dewatering, investigation, monitoring or remediation. Drilling of a well for any water supply purpose is strictly prohibited. Groundwater extracted (from the property/within this area) for any purpose shall be considered potentially contaminated and any discharge of this water shall be done in accordance with state and federal law.
- 3. Monitoring. Several groundwater monitoring wells are located on the property to monitor the performance of the remedial action. The Grantor shall maintain clear access to these devices and protect them from damage. The Grantor shall report to Ecology within forty-eight (48) hours of the discovery of any damage to any monitoring device. Unless Ecology approves of an alternative plan in writing, the Grantor shall promptly repair the damage and submit a report documenting this work to Ecology within thirty (30) days of completing the repairs.

Groundwater shall be monitored by the Grantor per the Long-Term Groundwater Monitoring Plan, Sound Battery Property, 2310 East 11th Street, Tacoma, Washington, Washington State Department of Ecology Facility Site No. 1247, Voluntary Cleanup Program No. SW1208, dated May 19, 2016, prepared by Farallon.

Periodic Review

Effectiveness of completed cleanup actions

During the Site visit Ecology conducted on November 13, 2024, Ecology found no indications that the integrity of the cleanup action has been compromised. The Site is currently used for storage of semi-trailers. A photo log is in Appendix C.

Direct contact

The cleanup actions were intended to eliminate exposure to contaminated soil and groundwater at the Site. Exposure pathways to contaminated soils by ingestion and direct contact were reduced by excavation of lead-contaminated soils above the MTCA Method A cleanup level for industrial land use and implementation of a Covenant restricting Site use to industrial uses only.

As outlined in the Long-Term Groundwater Monitoring Plan by Farallon (Farallon 2016), groundwater monitoring has been performed every 18 months for a period of 5 years with samples collected in 2016, 2018, and 2019 following the cleanup actions. During these sampling events, results for total and dissolved lead at the four monitoring wells have been non-detect (Tables 2 through 5).

Protection of groundwater

Soils with lead at concentrations exceeding MTCA Method A cleanup levels for unrestricted land use remain at the Site; however, most of the contaminated soil source material has been removed. Results for groundwater samples collected since the cleanup actions were completed, as noted in the section above, indicate that groundwater has not been impacted by lead-contaminated soils remaining at the Site.

Institutional controls

Institutional controls in the form of a Covenant were implemented at the Site in 2017. The Covenant remains active and discoverable through the Pierce County Auditor. Ecology found no evidence a new instrument has been recorded that limits the effectiveness or applicability of the Covenant. This Covenant prohibits activities that will result in the release of contaminants contained as part of the cleanup action and prohibits any use of the property that is inconsistent with the Covenant, unless approved by Ecology in advance. This Covenant ensures the long-term integrity of the cleanup action will be protected.

New scientific information for individual hazardous substances or mixtures present at the Site

There is no new relevant scientific information for the hazardous substances remaining at the Site.

New applicable state and federal laws for hazardous substances present at the Site

There are no new applicable or relevant state or federal laws for hazardous substances remaining at the Site.

Current and projected Site and resource uses

The Site is used for industrial purposes. There have been no changes in current or projected future Site or resource uses. The current Site use is not likely to have a negative impact on the protectiveness of the cleanup action.

Availability and practicability of more permanent remedies

The remedy implemented included implementation of institutional controls, and it continues to be protective of human health and the environment. While more permanent remedies may be available, they are still not practicable at this Site.

Availability of improved analytical techniques to evaluate compliance with cleanup levels

The analytical methods used at the time of the cleanup action were capable of detection below the selected MTCA cleanup levels. The presence of improved analytical techniques would not affect decisions or recommendations made for the Site.

Conclusions

- The cleanup actions completed at the Site appear to be protective of human health and the environment.
- Soil cleanup levels have been met at the Site for industrial land use.
- Groundwater compliance monitoring at the Site indicates concentrations of total and dissolved lead are below MTCA Method A cleanup levels.
- Sufficient groundwater compliance monitoring has been conducted to demonstrate that groundwater has not been impacted by lead-contaminated soil remaining on Site above cleanup levels for unrestricted land use. Therefore, groundwater monitoring at the Site can be discontinued. If it is desired to decommission the monitoring wells, this should be done in accordance with WAC 173-160⁹.
- The Covenant for the property is in place and is effective in protecting human health and the environment from exposure to hazardous substances and the integrity of the cleanup action.

Based on this periodic review, Ecology has determined the requirements of the Covenant are being followed. No additional cleanup actions are required by the property owner at this time. The property owner is responsible for continuing to inspect the Site to ensure the integrity of the cleanup action is maintained, and that the land use remains industrial.

Next review

Ecology will schedule the next review for the Site five years from the date of this periodic review. If additional cleanup actions or institutional controls are required, the next periodic review will be scheduled five years after those activities are completed.

⁹ https://app.leg.wa.gov/wac/default.aspx?cite=173-160

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Ecology. 2024. Site visit. November 13.

Tables

Table 1. Cleanup level for lead in soil and groundwater.

Contaminant	Soil Cleanup Level (mg/kg) ¹	Groundwater Cleanup Level (µg/L) ²
Lead	1,000	15

Notes:

¹ The soil cleanup level is the MTCA Method A cleanup level for industrial land use.

² The groundwater cleanup level is the MTCA Method A cleanup level.

µg/L = micrograms per liter

mg/kg = milligrams per kilogram

Table 2. Groundwater contaminant concentrations at MW-1.

Date	Total Lead (μg/L)	Dissolved Lead (µg/L)
8/7/2012	1.3	<1.0
9/28/2016	<1.1	<1.0
1/16/2018	<1.1	<1.0
9/16/2019	<1.1	<1.0

Notes:

< = analyte not detected at or above the laboratory reporting limit listed $\mu g/L$ = micrograms per liter

Table 3. G	Groundwater	contaminant	concentrations	at MW-2.
		•••••••••••		••••••

Date	Total Lead (μg/L)	Dissolved Lead (µg/L)
8/7/2012	<1.1	<1.0
9/28/2016	<1.1	<1.0
1/16/2018	<1.1	<1.0
9/16/2019	<1.1	<1.0

Notes:

< = analyte not detected at or above the laboratory reporting limit listed $\mu g/L$ = micrograms per liter

Table 4. Groundwater	contaminant	concentrations	at MW-3.

Date	Total Lead (μg/L)	Dissolved Lead (µg/L)
8/7/2012	<1.1	<1.0
9/28/2016	<1.1	<1.0
1/16/2018	<1.1	<1.0
9/16/2019	<1.1	<1.0

Notes:

< = analyte not detected at or above the laboratory reporting limit listed $\mu g/L$ = micrograms per liter

Table 5.	Groundwater	contaminant	concentrations	at MW-4.

Date	Total Lead (μg/L)	Dissolved Lead (µg/L)
8/7/2012	<1.1	<1.0
9/28/2016	<1.1	<1.0
1/16/2018	<1.1	<1.0
9/16/2019	<1.1	<1.0

Notes:

< = analyte not detected at or above the laboratory reporting limit listed $\mu g/L$ = micrograms per liter

Appendix A. Vicinity Map



Figure 1: Site vicinity map (Farallon Consulting, L.L.C. [Farallon] 2019)

Appendix B. Site Plan



Figure 1: Site layout (Farallon 2019).



Figure 2: Limits of soil excavations and confirmation soil sample locations (Farallon 2015).

Appendix C. Photo Log

Photo 1

Direction: Facing Northeast

Description: View along the northwest boundary of the Site near E 11th Street.



Photo 2 Direction: Facing East Description: View of the southwest boundary of the Site.



Photo 3

Direction: Facing South

Description: View of the Site from the northernmost corner.



Photo 4

Direction: Facing Northwest

Description: View of the Site from the southeast boundary.



Photo 5

Direction: Facing Southeast

Description: View along the southwest boundary of the Site.



Photo 6

Direction: Not Applicable (NA)

Description: View of monitoring well MW-1.

