



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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May 11, 2018

Mr. Nicholas Stack
Lynnwood Auto Body Shop
19230 Highway 99
Lynnwood, WA 98036

Re: Further Action at a Property associated with a Site:

- **Property Address:** Kelly's Furniture Refinishing
- **Site Address:** 19230 Highway 99, Lynnwood, WA 98036
- **Facility/Site No.:** 21932318
- **Cleanup Site ID No.:** 11735
- **VCP Project No.:** NW2555

Dear Mr. Stack:

The Washington State Department of Ecology (Ecology) received your request for an opinion on your independent cleanup of a Property associated with the **Kelly's Furniture Refinishing** facility (Site). This letter provides our opinion. We are providing this opinion under the authority of the Model Toxics Control Act (MTCA), Chapter 70.105D RCW.

Issues Presented and Opinion

1. Is further remedial action necessary at the Property to clean up contamination associated with the Site?

YES. Ecology has determined that further remedial action is necessary at the Property to clean up contamination associated with the Site.

2. Is further remedial action also necessary elsewhere at the Site?

YES. Ecology has determined that further remedial action is also necessary elsewhere at the Site.

This opinion is based on an analysis of whether the remedial action meets the substantive requirements of MTCA, Chapter 70.105D RCW, and its implementing regulations, Chapter 173-340 WAC (collectively "substantive requirements of MTCA"). The analysis is provided below.



Description of the Property and the Site

This opinion applies only to the Property and the Site described below. This opinion does not apply to any other sites that may affect the Property. Any such sites, if known, are identified separately below.

1. Description of the Property.

The Property includes the following tax parcel in Snohomish County, which was affected by the Site and addressed by your cleanup:

- Tax Parcel #1: 00585-300000-501

Enclosure A includes a legal description of the Property. **Enclosure B** includes a diagram of the Site that illustrates the location of the Property within the Site.

2. Description of the Site.

The Site is defined by the nature and extent of contamination associated with the following releases of Chemicals of Concern (COCs):

- Gasoline-range petroleum hydrocarbons (TPH-G), diesel-range petroleum hydrocarbons (TPH-D), oil-range petroleum hydrocarbons (TPH-O); benzene, toluene, ethylbenzene, and xylenes (BTEX) into the Soil.
- TPH-G, TPH-D and BTEX into the Ground Water.

Those releases have affected more than one parcel of real property, including the parcel identified above.

Enclosure B includes a detailed description and diagram of the Site, as currently known to Ecology.

3. Identification of Other Sites that may affect the Property.

Please note a parcel of real property can be affected by multiple sites. At this time, we have no information that the Property is affected by other sites.

Basis for the Opinion

This opinion is based on the information contained in the following documents:

1. Aerotech Environmental Consulting, Inc., *Phase I Environmental Site Assessment Report, Lynnwood Auto Body Shop, 19230 Highway 99, Lynnwood, Washington, VCP Project #NW2555*, dated July 19, 2011.
2. Aerotech Environmental Consulting, Inc., *Limited Phase II Environmental Subsurface Investigation Report, Lynnwood Auto Body Shop, 19230 Highway 99, Lynnwood, Washington 98036, VCP Project #NW2555*, dated August 28, 2011.
3. Aerotech Environmental Consulting, Inc., *Site Remediation and Closure Report, Lynnwood Auto Body Shop, 19230 Highway 99, Lynnwood, Washington, VCP Project #NW2555*, dated November 3, 2011.
4. Aerotech Environmental Consulting, Inc., *Simplified Terrestrial Ecological Evaluation, Lynnwood Auto Body Shop, 19230 Highway 99, Lynnwood, Washington, VCP Project #NW2555*.
5. Aerotech Environmental Consulting, Inc., *Area-Wide Geological and Hydrogeological Analysis, Lynnwood Auto Body Shop, 19230 Highway 99, Lynnwood, Washington, VCP Project #NW2555*, dated September 13, 2012.
6. Aerotech Environmental Consulting, Inc., *Groundwater Monitoring Well Installation Report, Lynnwood Auto Body Shop, 19230 Highway 99, Lynnwood, Washington 98036, VCP Project #NW2555*, dated December 18, 2014.
7. Aerotech Environmental Consulting, Inc., *Groundwater Sampling Report, First Quarter 2014, Lynnwood Auto Body Shop, 19230 Highway 99, Lynnwood, Washington 98036, VCP Project #NW2555*, dated December 22, 2014.
8. Aerotech Environmental Consulting, Inc., *Groundwater Sampling Report, Second Quarter March 2015, Lynnwood Auto Body Shop, 19230 Highway 99, Lynnwood, Washington 98036, VCP Project #NW2555*, dated April 21, 2015.
9. Aerotech Environmental Consulting, Inc., *Groundwater Monitoring Reports, Lynnwood Auto Body Shop, 19230 Highway 99, Lynnwood, Washington 98036, VCP Project #NW2555*, dated June 26, 2015.
10. Aerotech Environmental Consulting, Inc., *RI and Proposed Cleanup Action Plan with*

Phase III Subsurface Investigation Results, Lynnwood Auto Body Shop, 19230 Highway 99, Lynnwood, Washington 98036, VCP Project #NW2555, dated February 6, 2017.

Those documents are kept in the Central Files of the Northwest Regional Office of Ecology (NWRO) for review by appointment only. You can make an appointment by completing a Request for Public Record form (<https://www.ecology.wa.gov/About-us/Accountability-transparency/Public-records-requests>) and emailing it to PublicRecordsOfficer@ecy.wa.gov, or contacting the Public Records Officer at 360-407-6040.

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

Analysis of the Cleanup

Ecology has concluded that **further remedial action** is necessary at the Property to clean up contamination associated with the Site. That conclusion is based on the following analysis:

1. Characterization of the Site.

Ecology has determined your characterization of the Site is not sufficient to establish cleanup standards and select a final cleanup action. The Site is described above and in **Enclosure A**. Extensive (vertical and horizontal) petroleum-contaminated soil remains at the Property. The following additional Site characterization information is needed to enable a better critique and support of a final remedy for Ecology's determination.

Site Data Presentation

Additional figures should be provided that:

- Clearly depict Site geology and hydrogeology on cross-section diagrams that include a vertical scale referenced to mean sea level datum. Include all boring logs in a report appendix, including those used to create cross-sections.
- Present all soil sample and groundwater sample data exceedances in an enlarged or bold text, on plan-view maps and cross-sections, and are consistent with summary data tables showing the same chemical information.
- Present the actual numerical results above MTCA Method A cleanup levels, using the same units as the Method A table numbers. Data can be misconstrued when a laboratory notation such as "x 10,000" is removed from the figure and placed in the legend.

- Clearly depict the soil excavation boundaries, results and locations of confirmation samples.
- Show the groundwater elevation contours (mean sea level datum) and groundwater flow directions, document groundwater gradient calculations.

Vapor Intrusion Pathway

The current vapor intrusion pathway must be fully evaluated and considered during the development of cleanup levels and cleanup actions for the Site. As discussed in prior meetings and email correspondence, a vapor intrusion evaluation must be conducted that incorporated the following elements:

- For the vapor intrusion pathway to be considered complete, there must be three components: a source of volatile compounds in the subsurface environment (soil and ground water), inhabited buildings close enough to subsurface contamination to be threatened by vapor intrusion, and a migration route present to connect them. Refer to Ecology's Draft ***Guidance for Evaluating Soil Vapor Intrusion in Washington State: Investigation and Remedial Action***, dated October 2009, and revised in 2016, for assessing and addressing soil vapor issues; future VI considerations; adjacent property VI considerations.
- In June 2015, Ecology revised vapor intrusion screening levels to reflect updated toxicological information. In addition, the sub-slab attenuation factor was reduced from 0.1 to 0.03 which raises sub-slab screening levels by about a factor of 3. A summary of these changes and a link to the excel spreadsheet with revised ground water, sub-slab soil gas and deep soil gas screening levels is available at:

<https://www.ecology.wa.gov/Regulations-Permits/guidance-technical-assistance/Vapor-intrusion-overview/Vaport-intrusion-2015-changes-to-the-2009-toxicit>

- On June 11, 2015, EPA released two guidance documents related to vapor intrusion that are referenced in Ecology guidance documents:
 - [Technical Guide for Assessing and Mitigating the Vapor Intrusion Pathway from Subsurface Vapor Sources to Indoor Air](#) and
 - [Technical Guide for Addressing Petroleum Vapor Intrusion at Leaking Underground Storage Tank Sites](#)

- Updated Ecology policy guidance should now be utilized to determine whether or not there is a potential at the Property for future VI pathway concerns, or a potential for adjacent property impacts.
- Ecology has issued new guidance related to petroleum VI (PVI) screening. Implementation Memorandum No. 14 entitled: "*Updated Process for Initially Assessing the Potential for Petroleum Vapor Intrusion*," dated March 31, 2016, incorporates a majority of EPA's recommendations for assessing sites where the only volatile subsurface contaminants of concern are petroleum hydrocarbons associated with a fuel release. Most petroleum-only sites should complete an initial VI assessment using the process contained in Implementation Memo No. 14. Implementation Memo No. 14 can be found at:
<https://fortress.wa.gov/ecy/publications/Summary/Pages/1609046.html>.
- Ecology has issued new guidance related to PVI evaluation. Implementation Memorandum No. 18 entitled: "*Petroleum Vapor Intrusion (PVI) Updated Screening Levels, Cleanup Levels and Sampling Considerations*" dated January 10, 2018. The memo proposes a generic Method B TPH indoor air cleanup level, addresses the requirement to account for the additive effects of the compounds present in petroleum mixtures and provides recommendations for assessing the potential threat of petroleum VI on future buildings. Implementation Memorandum No. 18 can be found at:
<https://fortress.wa.gov/ecy/publications/Summary/Pages/1709043.html>.

Summary

The characterization of the Site must be sufficient to establish cleanup standards for the Site and select a cleanup for the Property. The impacted area that comprises the Site, and all media of concern needs to be fully characterized, which should include all off-Property areas to the greatest degree possible.

2. Establishment of cleanup standards for the Site.

Ecology has determined the cleanup levels and points of compliance you established for the Site do not meet the substantive requirements of MTCA.

Cleanup Levels:

Soil:

The Site is located in a mixed residential and commercial area. Future site plans could

include businesses to which the public has access, so unrestricted land use is the appropriate basis for development of soil cleanup levels. The following potential exposure/risk pathways were appropriate to consider:

- Human health protection from direct soil contact pathway exposure
- Human health protection from soil-to-groundwater pathway exposure
- Human health protection from soil-to-air pathway exposure
- Human health protection from soil-to-surface water pathway exposure
- Terrestrial ecological protection

Because the site has relatively few contaminants, Method A can be used to develop cleanup levels for the Site contaminants of concern. MTCA Method B soil cleanup standards for the COCs cannot be used because the Property shallow ground water has documented contaminant impacts above MTCA Method A groundwater cleanup levels.

The point of compliance for protection of human health (direct contact) and the protection of ground water is soil throughout the Site to a depth of 15 feet below the ground surface. Cleanup levels protective of terrestrial ecological receptors are not necessary because the Site meets the initial TEE exclusion criteria (MTCA WAC 173-340-7491(1)(c)(i)). There are less than 1.5 acres of contiguous undeveloped land on or within 500 feet of any part of the Site.

Ambient Air:

The standard point of compliance for air is in the ambient air throughout the Site. Completion of a soil vapor analysis per Ecology guidance is required to evaluate compliance with ambient air standards, as described above in Section 1 of this letter.

Ground Water:

Ground water cleanup levels protective of ground water as a drinking water source are appropriate for this Site. MTCA Method A was selected for the establishment of cleanup levels for the Site which is protective of this use.

The standard point of compliance for groundwater 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.

3. Selection of cleanup for the Property.

Ecology has determined the cleanup you selected for the Property **does not meet** the substantive requirements of MTCA.

Soil excavation and removal has been conducted, but other remedial options, particularly treatment options appropriate for petroleum contamination were not critiqued, or instituted. The cleanup selected does not meet the minimum requirements in WAC 173-340-360(2) and could exacerbate conditions at the Site. Other reasonable cleanup alternatives were not evaluated and presented in a Feasibility Study (FS) and Disproportionate Cost Analysis (DCA). Note that if a Site meets the requirements for use of a model remedy, it is not necessary to conduct a Feasibility Study (FS) or Disproportionate Cost Analysis (DCA).

A soil Model Remedy was proposed in the February 2017 *RI and Proposed Cleanup Action Plan* submittal, using MTCA Method B soil cleanup standards for the COCs. This approach cannot be used as the Property shallow ground water has shown documented contaminant impacts above MTCA Method A COC cleanup levels (see Chapter 3). Eligibility Criteria for Model Remedies, in *Model Remedies for Site with Petroleum Contaminated Soils*, Ecology Publication No. 15-09-043, revised December 2017). Method A soil and groundwater cleanup levels shall be applied to this Site.

A groundwater Model Remedy may be applicable to the Site if the requirements for one of the 12 groundwater model remedies are met (see *Model Remedies for Site with Petroleum Impacts to Groundwater*, Ecology Publication No. 16-09-057, revised December 2017).

4. Cleanup of the Property.

Ecology has determined the cleanup you performed does not meet the applicable Site cleanup standards within the Property.

The cleanup performed consisted of the excavation and removal of approximately 998 tons of petroleum-contaminated soil. Confirmation sampling of soil for constituents of concern was conducted.

The analytical results indicated that an estimated 5,770 cubic feet (278 tons) of petroleum-contaminated soils (PCS) with contaminant levels above the MTCA Method A cleanup levels remain beneath the following areas of the Site.

- Beneath the completed excavation (at approximately 20 feet bgs).
- Adjoining the public sidewalk and Highway 99
- Underneath and next to the building (North Shop)

- Possibly next to a storm sewer conduit
- Two hot spot areas with an estimated volume of 67 tons of PCS remaining:
 - East of the building (North Shop): TPH-D concentrations of 10,000-11,000 mg/kg between depths of 8 and 14 feet bgs; TPH-G concentrations of 1,200 mg/kg at depth of 12 feet bgs.
 - East Driveway, in an area between MW-1 and the east Property line; TPH-D concentrations of 10,000-30,000 mg/kg between depths of 8 and 19 ft bgs; TPH-G concentrations of 8,200 mg/kg at depth of 14 feet bgs.

The PCS spans a distance of 75 feet, extending from the building to the east driveway (an area of approx. 806 sq feet; at depths of 6 to 23 feet). Soil samples collected from 10 to 22 feet bgs were contaminated above MTCA Method A cleanup levels for the Contaminants of Concern (COCs).

Shallow ground water was encountered on the Property at depths of approximately 12 feet bgs. Four locations (SB-01-W, SB-03-W, SB-04-W SB-07-W) were sampled and found to have TPH-G and TPH-D levels above MTCA Method A cleanup levels:

• SB-01-W	TPH-G: 59,000 ug/l	TPH-D: 400,000 ug/l
• SB-03-W	TPH-G: 2,000 ug/l	TPH-D: 30,000 ug/l
• SB-04-W	TPH-G: 8,700 ug/l	TPH-D: 6,900 ug/l
• SB-07-W	TPH-G: 190,000 ug/l	TPH-D: 190,000 ug/l

The deeper aquifer was assessed through the installation of groundwater monitoring well MW-1. This well is located in the former tank basin area, was drilled to a depth of 55 feet bgs, and was constructed with a screened interval set between depths of 40 and 55 feet bgs in order to document groundwater conditions below the glacial till. Monitoring well MW-1 was monitored for four consecutive quarters of sampling and no COCs above the MTCA Method A cleanup levels were found. Additional information and verification is needed to confirm that the glacial till unit penetrated by monitoring well MW-1 is continuous beneath the Site.

Further action is necessary to achieve or maintain compliance with cleanup standards, including development of an Environmental Covenant (EC) that includes the following:

- Restrictions on land use to prohibit activities that may result in release of, or exposure to, contamination.
- Engineered controls constructed and implemented to prevent or limit movement of, or exposure to, hazardous substances remaining at the Site.

- Location and extent of those controls (e.g., boundary of the property to the extent affected by contamination).
- Operation, maintenance and contingency plan for those controls, including annual inspection and maintenance of the Property asphalt, and steps to be taken in the event of control system failure.
- Confirmation Groundwater Compliance Monitoring Plan

An EC is required to support a Property No Further Action (NFA) determination to assure that the selected cleanup actions remain protective of human health and the environment. The EC would be recorded with Snohomish County and included as an enclosure to the Property NFA opinion letter. It would be appropriate to submit a draft EC with the Site Cleanup Action Report for Ecology's consideration on a final opinion for the Site. The steps to prepare an EC are described in **Enclosure C**.

A Disproportionate Cost Analysis (DCA) will also be required to document that all practicable measures to clean up contamination on the Site have been implemented, unless the Site qualifies for a groundwater model remedy approach.

Post-Cleanup Controls and Monitoring

Post-cleanup controls and monitoring are remedial actions performed after the cleanup to maintain compliance with cleanup standards. The final Property NFA opinion for the Property will be dependent on the continued performance and effectiveness of controls to be included in the EC, as described in Section 4 of this letter.

Limitations of the Opinion

1. Opinion does not settle liability with the state.

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

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

To settle liability with the state and obtain protection from contribution claims, a person must enter into a consent decree with Ecology under RCW 70.105D.040(4).

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2. Opinion does not constitute a determination of substantial equivalence.

To recover remedial action costs from other liable persons under MTCA, one must demonstrate that the action is the substantial equivalent of an Ecology-conducted or Ecology-supervised action. This opinion does not determine whether the action you performed is substantially equivalent. Courts make that determination. *See* RCW 70.105D.080 and WAC 173-340-545.

3. State is immune from liability.


The state, Ecology, and its officers and employees are immune from all liability, and no cause of action of any nature may arise from any act or omission in providing this opinion. *See* RCW 70.105D.030(1)(i).

Contact Information

Thank you for choosing to clean up your Property under the Voluntary Cleanup Program (VCP). After you have addressed our concerns, you may request another review of your cleanup. Please do not hesitate to request additional services as your cleanup progresses. We look forward to working with you.

For more information about the VCP and the cleanup process, please visit our web site: www.ecy.wa.gov/programs/tcp/vcp/vcpmain.htm. If you have any questions about this opinion, please contact me by phone at 425-649-4422 or by e-mail glynis.carrosino@ecy.wa.gov.

Sincerely,


Glynis A. Carrosino, Project Manager
NWRO Toxics Cleanup Program

Enclosures (3): A – Legal Description of the Property
 B – Description and Diagrams of the Site
 C – Environmental Covenant Steps

cc: Alan Blotch, Aerotech Environmental Consulting, Inc.
 Sonia Fernandez, Ecology VCP Coordinator

Enclosure A

Legal Description of the Property

**Section 16 Township 27 Range 04 Quarter SW STATE PLAT IN SEC 16 TWP 27 RGE 04
BLK 000 D-01 – LOT 5**

Enclosure B

Description and Diagrams of the Site (Including the Property)

Site Description

This enclosure provides Ecology's understanding, and interpretation, of Site conditions and forms the basis for the opinions expressed in the letter.

Site Definition: The Site is defined by the extent of releases of TPH-G, TPH-D and BTEX to soil and ground water associated with 19230 Highway 99, in Lynnwood, Washington (the Property).

Area Description: The Property is approximately 0.59 acres in size, and is located at the southwestern intersection of Highway 99 and 196th Avenue in Lynnwood, Washington (**Enclosure B Figure 1**). The area comprises commercial businesses and residential properties. To the north is a restaurant and associated asphalt parking lot; to the south is an office building followed by a Texaco branded service station; to the west is 60th Avenue West, followed by a residential neighborhood (northwest) and a commercial mail area (southwest); to the east is Highway 99 followed by office and school playing fields.

The Snohomish County Assessor parcel number for the Property which comprises the Site is: 00585-300000-501, within Township 27N; Range 4E; Section 16, SW Quarter. The Property coordinates are: Latitude 47 degrees, 49 minutes, 26.8 seconds; Longitude -122 degrees, 18 minutes, 45.4 seconds.

Property History and Current Use: The Property is currently occupied by an 8,000 square foot building located on the south side of the Property, constructed of concrete blocks on a concrete slab (**Enclosure B Figure 2**). The first structure was constructed in 1946 for a Tool Crib company. A second building was constructed (to the rear of the original building) in 1961 as the Lynnwood Body Shop, and a connecting wing was added between the two structures in 1971 and 1979. In 1979, the connecting wing housed a retail area that did business as Kelly's Furniture Refinishing, an upholster business.

A gasoline service station was also part of the Tool Crib Company from 1946 to 1979. The fueling island was located on the southeastern portion of the Property. Gasoline and diesel were stored in two underground storage tanks (USTs). Reports state that the two USTs were removed in 1979 but no documentation is available. A ground penetrating radar study conducted in 2011 indicated that the USTs had been removed, and soil borings confirmed the presence of petroleum-contaminated soil. In 2011, the Site operations as Kelly's Furniture Refinishing ceased. In late 2011, the Property was purchased by the current owners. The buildings and Property are currently operational as an auto body repair facility known as Lynnwood Auto Rebuild.

Contaminant Sources and History of Releases: The contaminant source for this Site consisted of releases from two underground gasoline storage tanks (USTs), which operated from 1946 until 1979. The two USTs were apparently removed in 1992 but documentation is not available. The size of the two USTs is unknown. They were recorded as containing gasoline and diesel.

Surface/Storm Water System: Surface water drainage from the paved areas of the Site is collected in street catch basins operated by the City of Lynnwood. A storm sewer lateral extends from a catch basin near the North Wing Shop adjoin the office, to a sewer main under Highway 99. A sanitary sewer lateral is situated along the south wall of the building, and extends to a sanitary sewer main underneath Highway 99. The closest surface water body to the Site is Scriber Creek, located approximately 1,600 feet southwest of the Site.

Ecological Setting: The Property is covered with a building (an operating auto body shop) and asphalt. Land surrounding the Site is primarily covered with buildings, asphalt and concrete with small landscaped areas.

Physiographic Setting: The ground surface at the Property is at sea level to approximately 500 feet, and exhibits a surficial drainage toward the west.

Geology: The Site and vicinity are dominated at the surface and at depth by the Vashon glacier deposits. These deposits are in the form of till, a non-sorted mixture of clays, silts, sand, pebbles, gravels and sometimes boulders. Vashon till usually contains larger than usual amounts of silts and clays in its sand. Data gathered from well logs of groundwater wells that encircle the Property showed a subsurface composed of till to a depth of at least 27 feet below ground surface. In some cases the till depth was more than 48 feet bgs. The layer of till was followed by a brown sand with some silt. The sand layer continues to a depth of approximately 200 to 500 feet. The clay was found to be mixed with sand and silt. There is one layer of Blue Clay.

The subsurface soils are identified as Kitsap Silt Loam, a very deep, moderately well drained soil. The surface soil layer is dark grayish brown silt loam and about 6 inches thick. The upper part of the subsoil is mottled, dark brown silt loam and about 14 inches thick. The lower part is olive brown silt loam and about 13 inches thick. The substratum to a depth of 5 feet or more is stratified, mottled, light olive brown silty clay loam.

Water Supply: Alderwood Water District provides drinking water to this building. Sources for potable water are from reservoirs located in the Cascade Mountains.

Ground Water: Ground water information from on-site borings and area monitoring wells indicate depths to shallow ground water of approximately 12 to 16 feet bgs. Regional ground water data indicate that ground water in this shallow zone (perched on top of the Vashon till) flows to the southeast (**Enclosure B Figures 3 and 4**). Data from on-site monitoring well MW-1 shows depths to ground water in the advance outwash sand below the till of 31 to 34 feet bgs. Ground water in the advance outwash flows to the southwest towards Puget Sound, based on data from regional reports (**Enclosure B Figure 5**).

Release and Extent of Soil and Ground Water Contamination: Petroleum hydrocarbons (TPH-G, TPH-D, and TPH-O from releases from the two gasoline and diesel USTs are the known contaminants which were extensively present in soil at the Site. Petroleum-contaminated

soil (PCS) was removed to the 20-foot-depth level, although sample results confirmed that contamination was present at greater depths. PCS was not removed under the building foundation, nor beneath the Highway 99 right-of-way. A total of 22 soil samples collected from 10 to 22 feet bgs were contaminated above MTCA Method A cleanup levels for the COCs.

PCS estimated at 5,770 cubic feet (278 tons) remains beneath the Site at the following locations (**Enclosure B Figures 4, 6, and 7**):

- Along the eastern wall of the excavation adjoining Highway 99
- At the bottom of the excavation approximately 20 feet bgs.
- On the western side of the excavation at 16 to 20 feet bgs.
- In the exploratory trench west of the area of excavation at approximately 14 feet bgs
- Spanning a distance of 75 feet, extending from the building to the east driveway (an area of approximately 806 sq. ft., at depths of 6 to 23 feet bgs).
- Underneath and adjoin the building (North Shop)
- Possibly next to a storm sewer conduit

This remaining PCS includes two "hot spot" areas with a total estimated weight of 67 tons PCS at the following locations:

- East of the building (North Shop): TPH-D concentrations of 10,000-11,000 mg/kg between depths of 8 and 14 feet bgs; TPH-G concentrations of 1,200 mg/kg at depth of 12 feet bgs.
- East Driveway, in an area between MW-1 and the east Property line; TPH-D concentrations of 10,000-30,000 mg/kg between depths of 8 and 19 ft bgs; TPH-G concentrations of 8,200 mg/kg at depth of 14 feet bgs.

Petroleum hydrocarbons (TPH-G, TPH-D) are the known contaminants present in shallow ground water at the Site. Perched ground water was present inside the former UST pit at approximately 11 to 13 feet bgs. Perched ground water contamination was confirmed at four locations (SB-01-W, SB-03-W, SB-04-W SB-07-W) which were sampled and found to have TPH-G and TPH-D levels above MTCA Method A cleanup levels (**Enclosure B Figure 8**).

• SB-01-W	TPH-G: 59,000 ug/l	TPH-D: 400,000 ug/l
• SB-03-W	TPH-G: 2,000 ug/l	TPH-D: 30,000 ug/l
• SB-04-W	TPH-G: 8,700 ug/l	TPH-D: 6,900 ug/l
• SB-07-W	TPH-G: 190,000 ug/l	TPH-D: 190,000 ug/l

A single deep ground water monitoring well (MW-1) was installed in the former tank basin area to a depth of 55 feet bgs, with a screened interval set between depths of 40 and 55 feet bgs in order to document conditions below the till. Monitoring well MW-1 was tested for TPH-G, TPH-D, TPH-O, lead, chlorinated volatile organic compounds (VOCs) and polycyclic aromatic hydrocarbons (PAHs), none of which was found above MTCA Method A cleanup levels. Monitoring well MW-1 was sampled for four consecutive quarters with no exceedances above MTCA Method A cleanup levels for TPH-G and TPH-D.

Site Diagrams

Enclosure C

Steps to Prepare an Environmental Covenant

Information on how to prepare an Environmental Covenant can be found in the Uniform Environmental Covenants Act (UECA), [Chapter 64.70 RCW](#), and [WAC 173-340-440](#) of the Model Toxics Cleanup Act (MTCA) Cleanup Regulation);

To create an Environmental Covenant, please do the following:

1. Conduct a title search to identify all persons holding a prior interest in the real property subject to the covenant. Generally, Ecology will not sign the covenant unless all prior interest holders are willing to sign on as grantors or subordinate their interests. See step 5 below.
2. Draft the covenant using the boilerplate document available on the VCP web site: www.ecy.wa.gov/programs/tcp/vcp/vcp2008/vcpRequirements.html. Please note that any changes to the boilerplate language in the covenant must be approved by the Attorney General's Office.
3. Submit the draft covenant for review and comment to the appropriate land use planning authority in your jurisdiction. When requesting such review, please do the following:
 - Send me a copy of your written request.
 - Provide the authority with my contact information.
 - Request that the authority send me a copy of any written response.

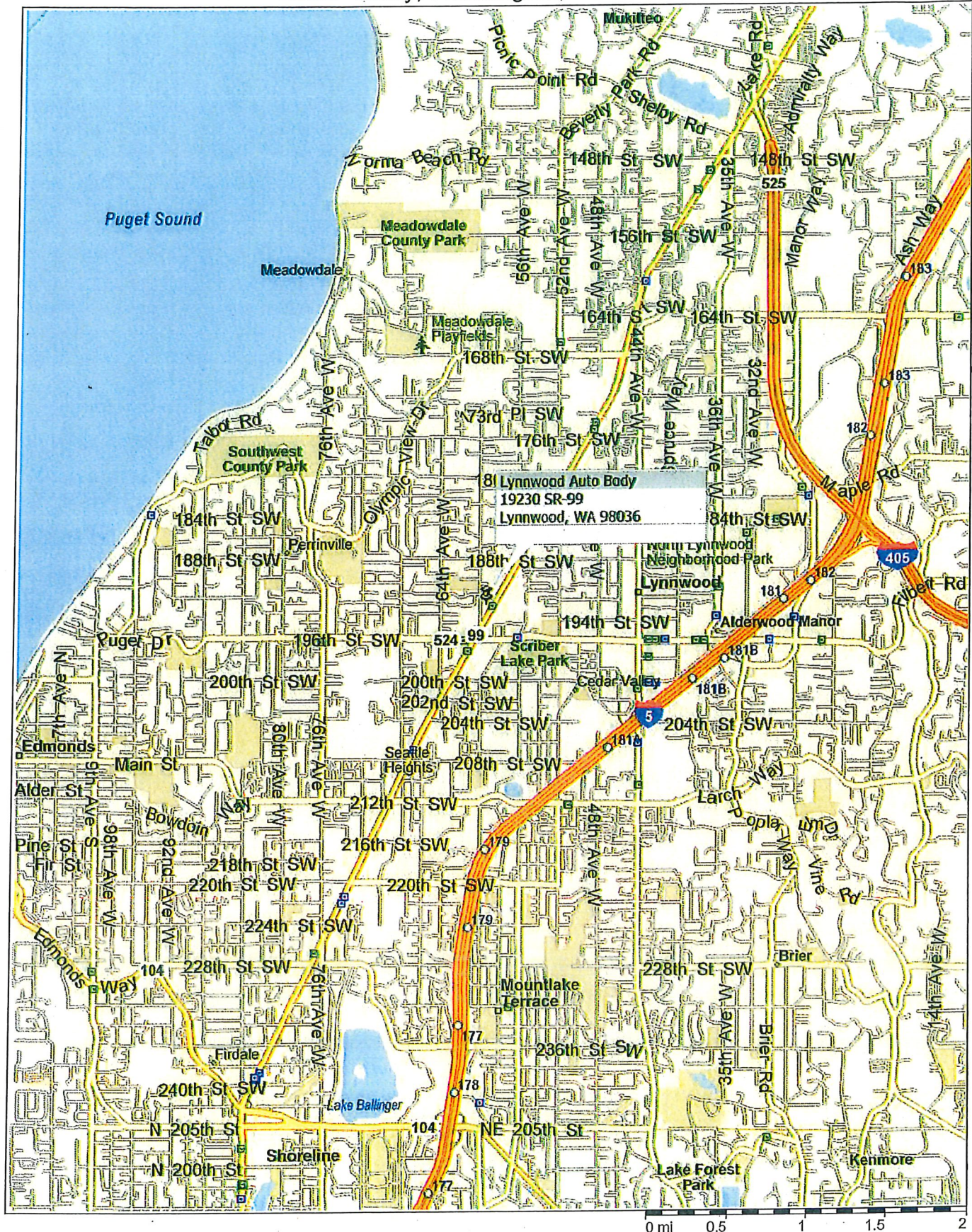
Ecology will not approve the covenant unless the authority has been adequately consulted.

4. Upon completing your consultations with the local land use planning authority, submit the draft covenant to Ecology for review and approval. Unless already submitted, also submit to Ecology any comments provided by the planning authority or, if none were provided, documentation of your consultation. Please note that Ecology will not approve the environmental covenant until after you have submitted a Cleanup Action report for the Site, and the report has been reviewed and accepted as appropriate by Ecology. (A Cleanup Action Report outline was provided for informational purpose at a meeting held at Ecology August 20, 2015)

4. Upon Ecology approval, obtain the signatures of all grantors of the covenant and obtain subordination agreements with any persons holding a prior interest in the real property subject to the covenant who are not signing the covenant as a grantor.
5. Upon obtaining the signatures of the grantors and any necessary subordination agreements, submit the covenant to Ecology for its signature as the grantee.
6. As stipulated by [Chapter 65.04 RCW](#):
 - Property owners are the first signatory to the Environmental Covenant (EC)
 - The EC then is delivered to Ecology for management signature
 - The EC then goes back to King County to record (after adequate consultation with County)
 - Upon recording, return the signed and recorded covenant to Ecology (original paperwork) and provide a copy of the recorded covenant to the following persons:
 - Each person that signed the covenant.
 - Each person holding a recorded interest in the real property subject to the covenant.
 - Each person in possession of the real property subject to the covenant at the time the covenant is executed.
 - Each municipality or other unit of local government in which real property subject to the covenant is located.
 - Any other persons Ecology requires.
 - The copy must be legible and the recording number must be evident.
7. The following exhibits need to be attached to the Environmental Covenant:
 - Legal Description of Property
 - Title Search Paperwork
 - Appropriate Site figures
 - Site Map with surveyed GPS Coordinates of the contaminated area (minimum 4 corners)
 - Operations and Maintenance Plan
 - Groundwater Compliance Monitoring Plan – if required (Groundwater Monitoring requirements)
 - Contingency Plan Outline
 - Subordination Agreements

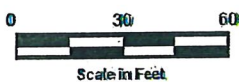
Kelly Furniture Remodeling (Lynnwood Auto Body)
 VEP # NW 2555

Cedar Valley, Washington, United States



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Enclosure B Figure 1



Aerotech Environmental Consulting, Inc.
 19609 International Blvd., Ste. 101
 Seattle, Washington

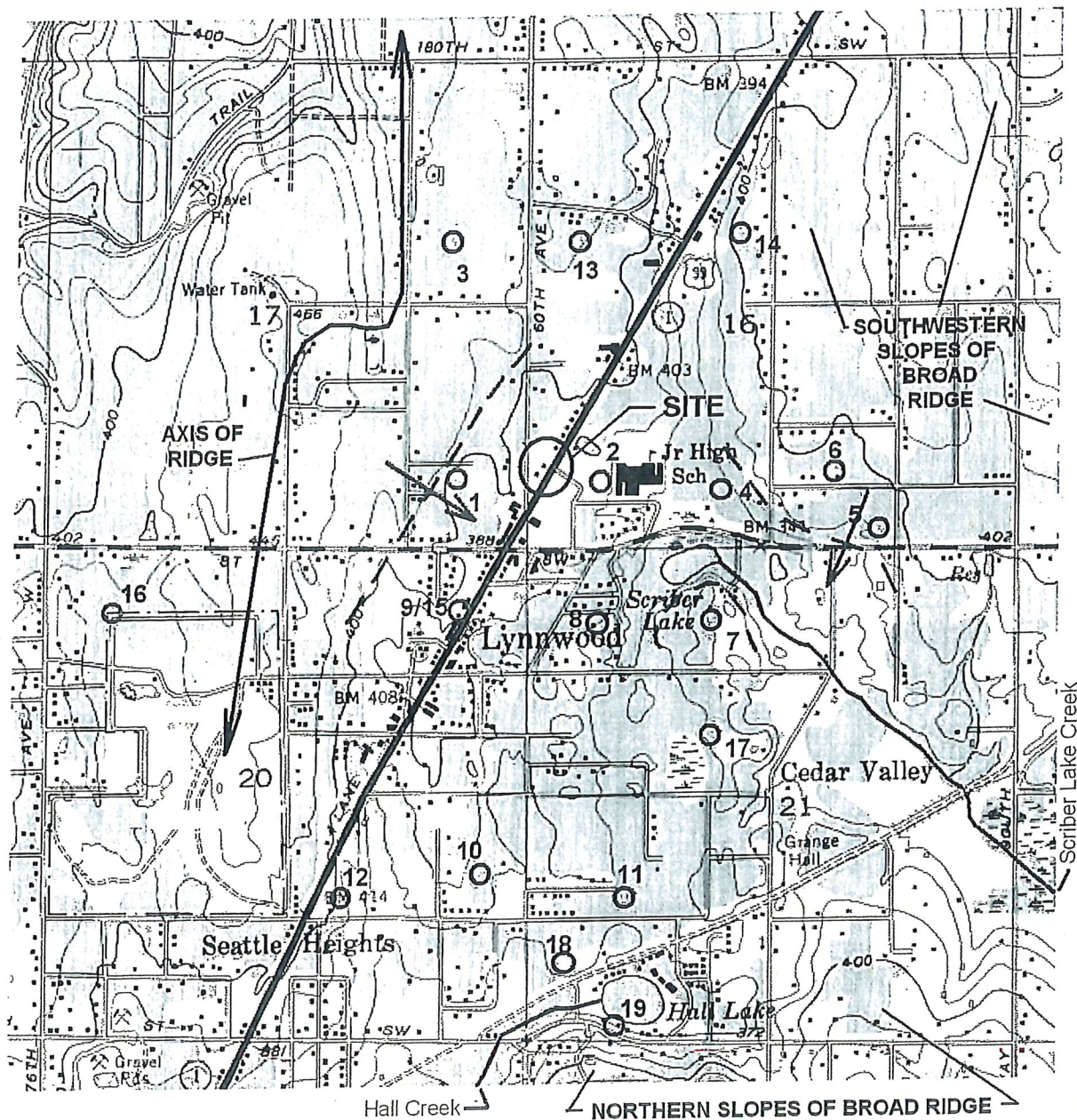
Drawing by McDermott - 15 Dec 2014

Figure 1

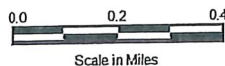
GROUNDWATER MONITORING WELL LOCATION MAP

Lynnwood Body Shop
 19230 Highway 99
 Lynnwood, WA

ENCLOSURE TO FIGURE 2



Shallow Aquifer Wells and Estimated Groundwater Elevations			
1 - 342	7 - 370	Scriber Lake - 330	Elevations in feet above mean sea level
4 - 343	9 - 325	Hall Lake - 330	
5 - 364			



- 1 ○ Water Well Location and Identification
- ➔ Inferred Groundwater Flow Direction
- - - Inferred 350 foot Equipotential Contour



Aerotech Environmental Consulting, Inc
19600 International Blvd., Ste. 101
SeaTac, Washington

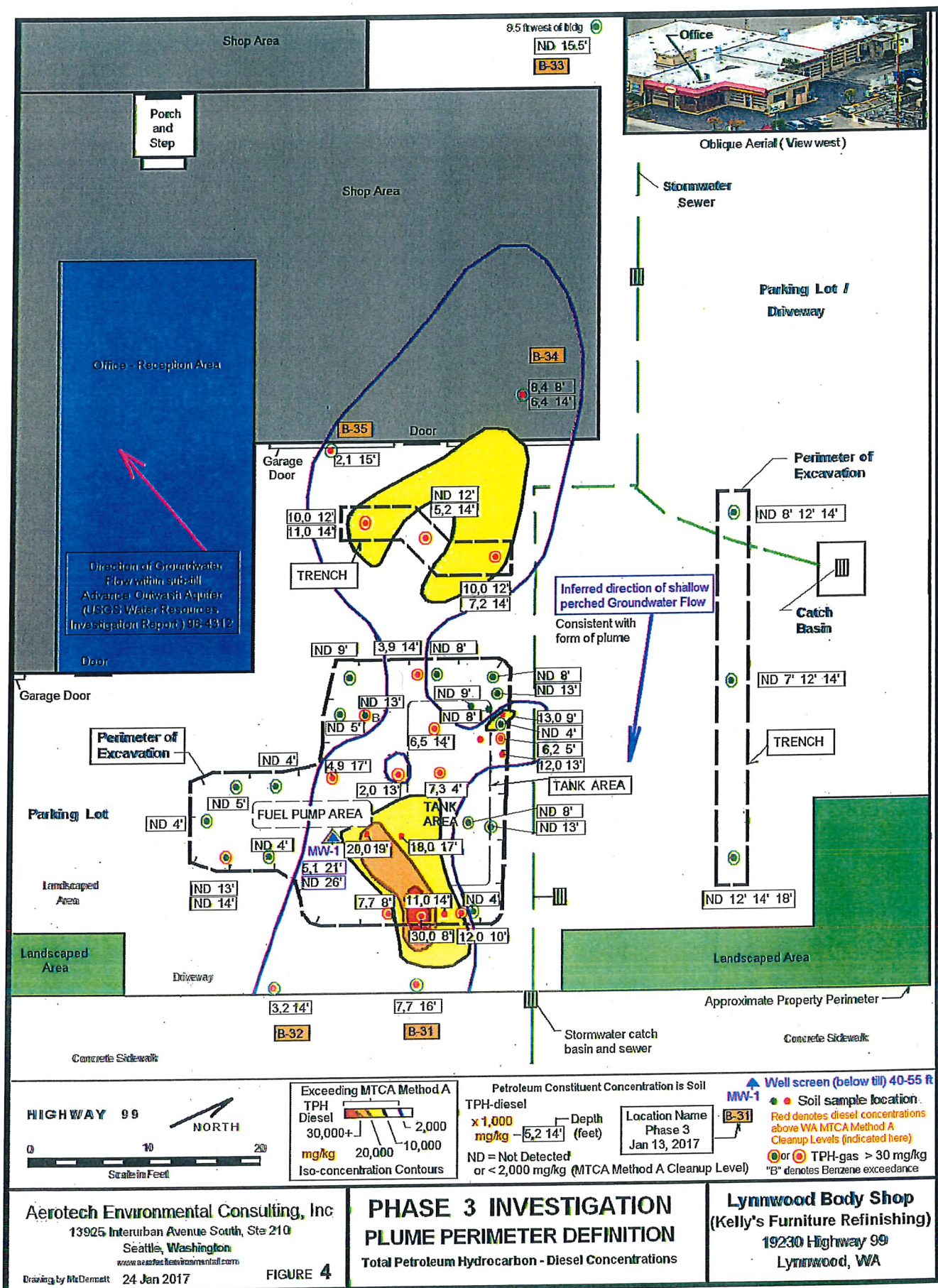
FIGURE 2

Drawing by McDermott, Aug 30, 2012 (Rev. Jan 20, 2017)

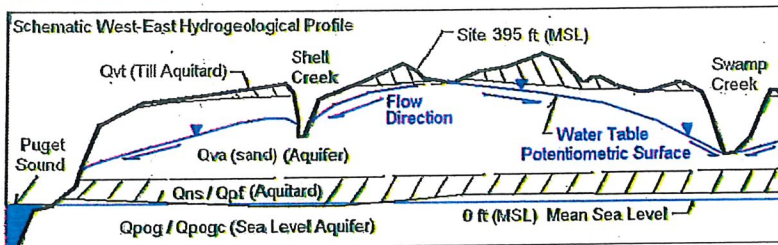
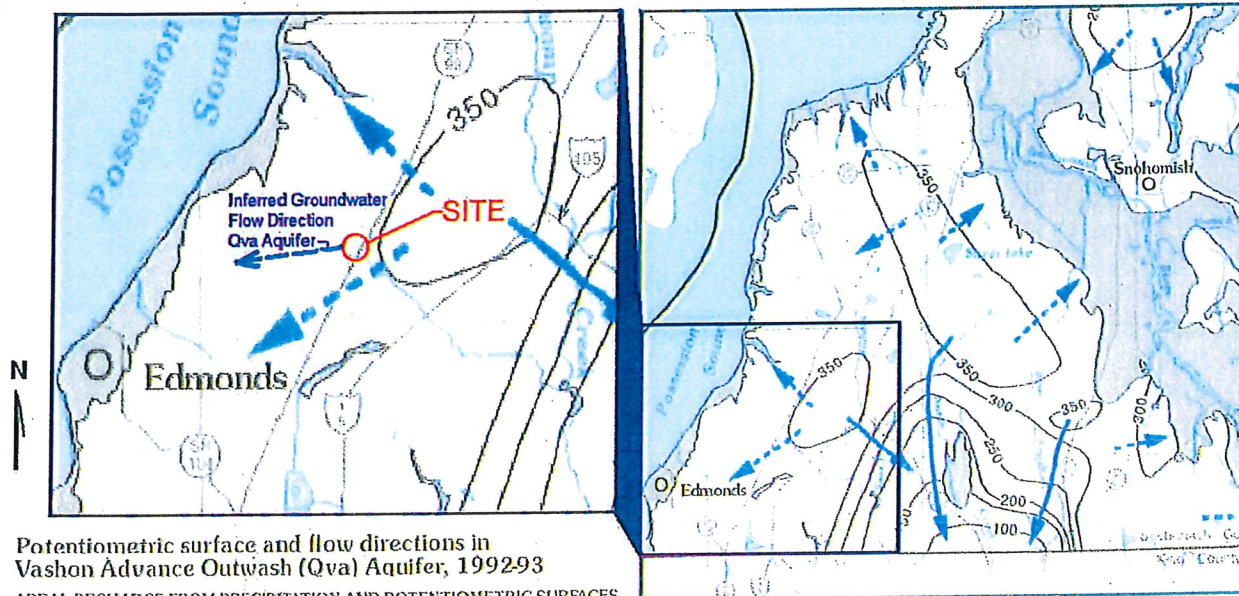
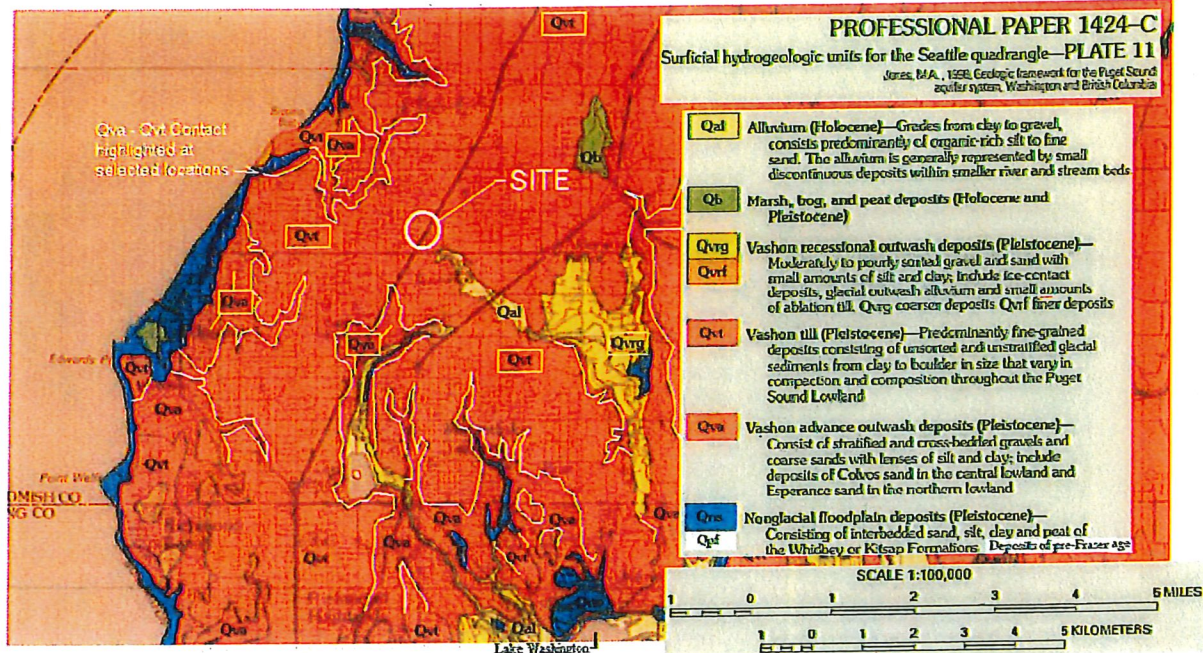
Groundwater Flow Direction
Perched Aquifer
Atop Weathered Vashon Glacial Till
USGS Edmonds East
7.5-minute Quadrangle, 1953

Lynnwood Auto Body Shop
VCP Proj. No. NW 2555
19230 Highway 99
Lynnwood, WA

ENCLOSURE B FIGURE 3



Enclosure B, Figure 4



WATER RESOURCES INVESTIGATIONS REPORT 96-1312
 Enhance potentiometric surface and flow direction PLATE 6
 600 North 2nd Avenue and 1200 1st Avenue, Seattle, WA 98101
 206-462-1000

Prepared in cooperation with
 SNOHOMISH COUNTY PUBLIC UTILITIES
 DISTRICT NO. 1 OF SNOHOMISH COUNTY
 and WASHINGTON STATE DEPARTMENT OF ECOLOGY

Area where Qva Aquifer is thinnest

Area of natural conditions

POTENTIOMETRIC CONTOUR—Shows approximate altitude of potentiometric surface, inferred above sea level. Contours below 100 feet. Quoted where necessary

DIRECTION OF GROUND-WATER FLOW—Dashed where approximate, located

Aerotech Environmental Consulting, Inc.
 13925 Interurban Avenue South, Ste. 210
 Seattle, Washington
 www.AerotechEnvironmental.com

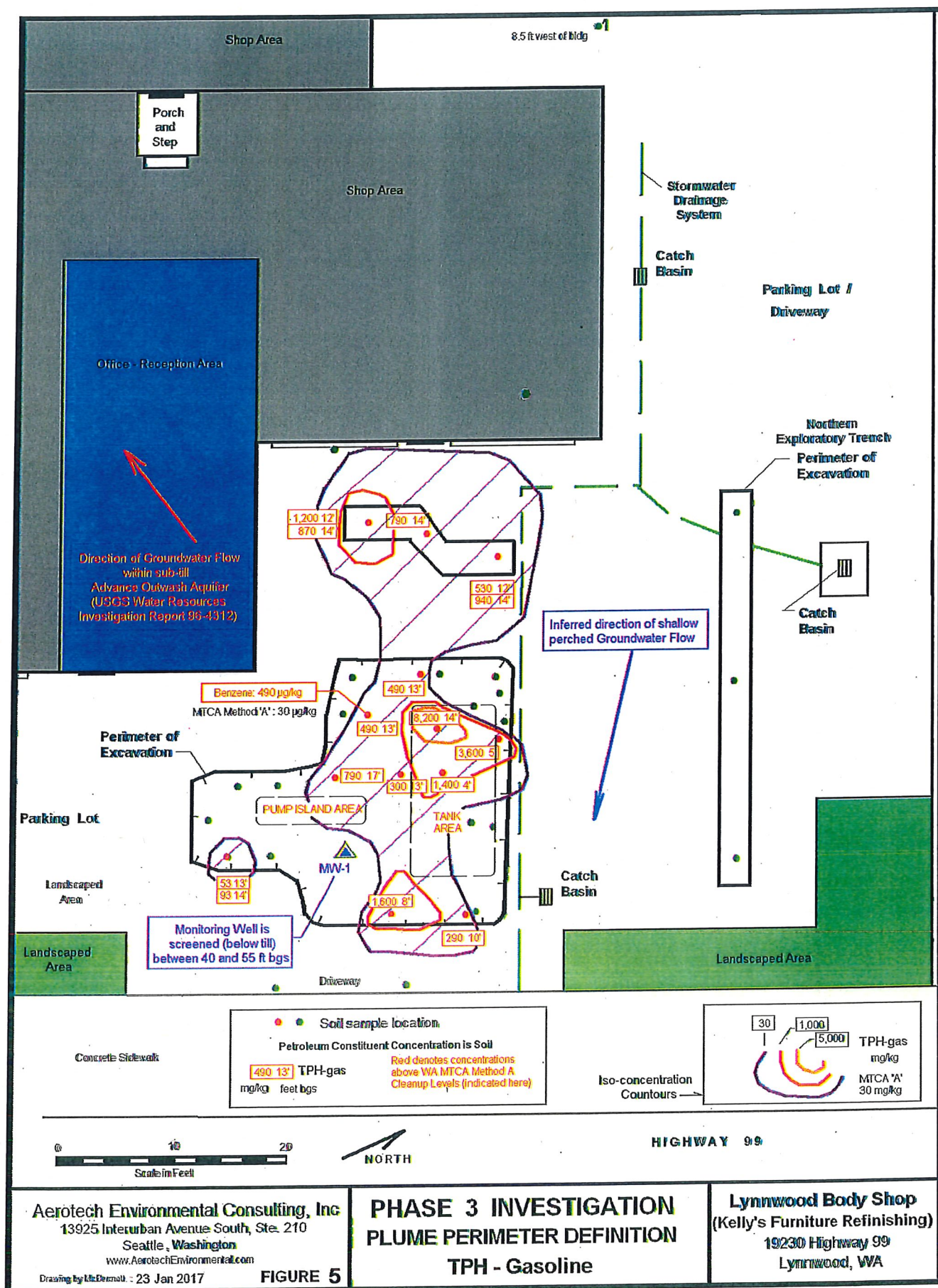
Drawing by McDermott - 20 Jan 2017

HYDROGEOLOGICAL PROFILE
 Surficial Geology and Potentiometric Surface
 Vashon Advance Outwash Aquifer

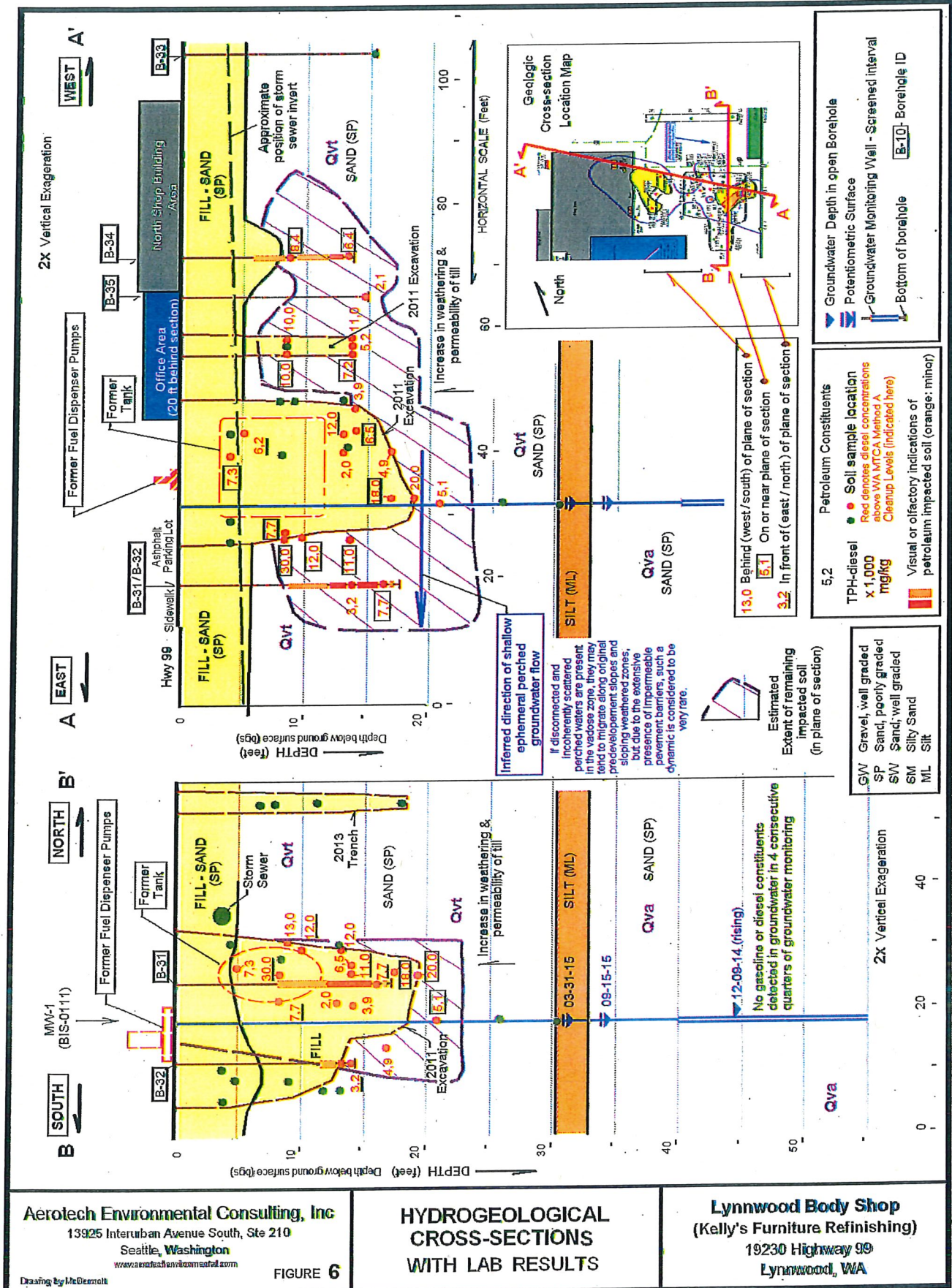
Lynnwood Body Shop
 19230 Highway 99
 Lynnwood, WA

FIGURE 2B

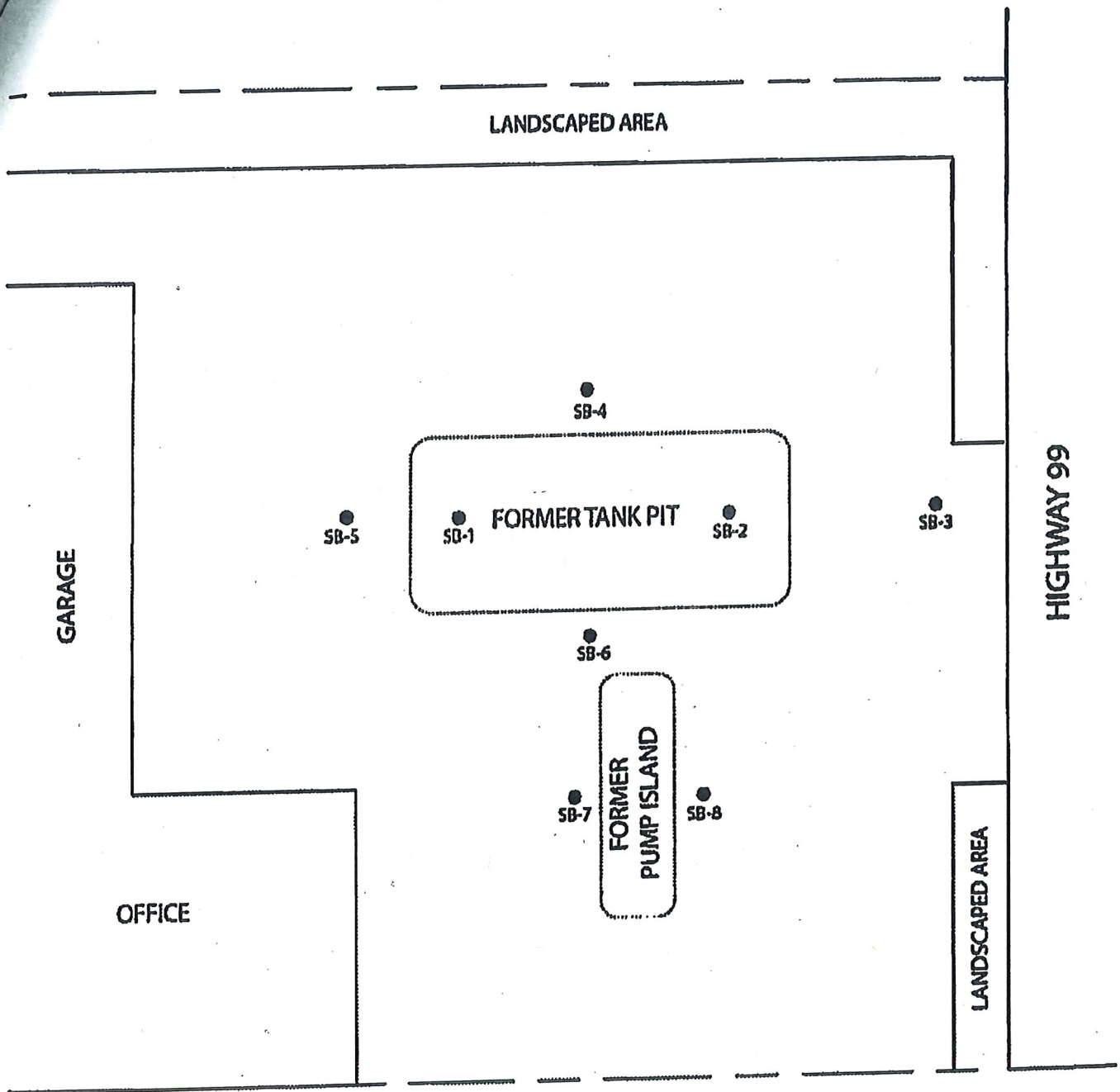
Enclosure B Figure 5



ENCLOSURE B FIGURE 6



ENCLOSURE B, FIGURE 7



ALDERCREST AUTO REBUILD
(LYNNWOOD BODY SHOP)
19230 HIGHWAY 99
LYNNWOOD, WASHINGTON 98036

— PROPERTY LINE
● SOIL BORINGS

Enclosure B Figure 8

SECTION III. ANALYTICAL RESULTS

ANALYSIS OF WATER SAMPLES:

Gasoline, Diesel & Oil (TPH) Constituents in Water Concentrations:

All samples were below the most stringent State of Washington Model Toxics Control Act Method "A" Residential Unrestricted Use cleanup levels.

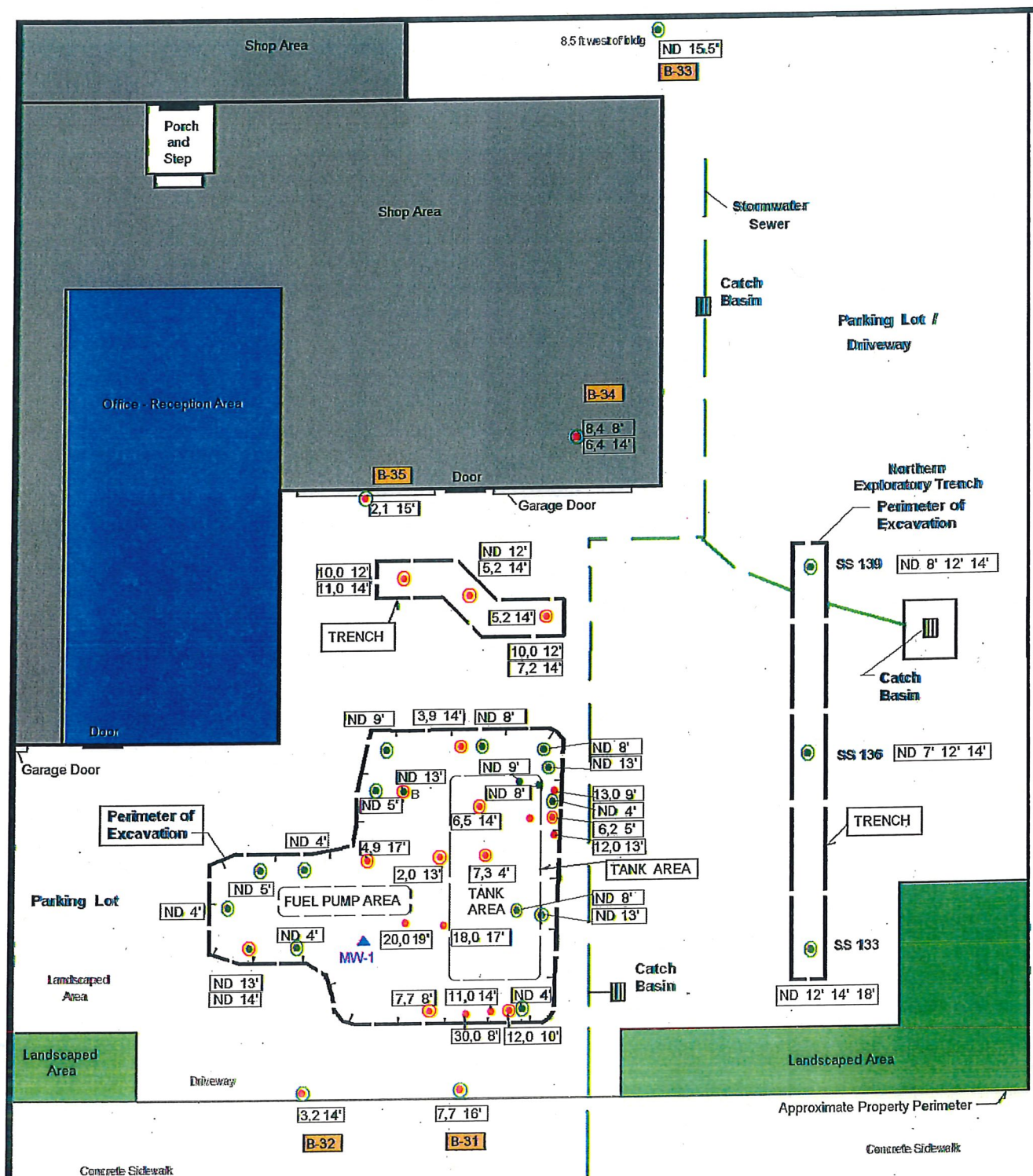
Sample Number	Date Analyzed	Gasoline Range Organics	Diesel Range Organics	Lube Oil Range Organics
SB-01-W	08-2-11	59,000 ug/L*	400,000 ug/L	ND
SB-03- W	08-2-11	2,000 ug/L	30,00 ug/L	ND
SB-04- W	08-2-11	8,700 ug/L	6,900 ug/L	ND
SB-07-W	08-2-11	190,000 ug/L	190,000 ug/L	ND
MTCA Cleanup Levels		800 ug/L	500 ug/L	500 ug/L

* ug/L is the same as parts per billion ('ppb')

Benzene, Toluene, Ethylbenzene & Xylenes (BTEX) Constituents in Water Concentrations:

All samples were below the most stringent State of Washington Model Toxics Control Act Method "A" Residential Unrestricted Use cleanup levels.

Sample Number	Date Analyzed	Benzene	Toluene	Ethylbenzene	Xylenes
SB-01-W	08-2-11	ND	ND	ND	ND
SB-03- W	08-2-11	2.4	ND	1.4	ND
SB-04- W	08-2-11	ND	1.3	ND	ND
SB-07-W	08-2-11	ND	ND	ND	3.1
MTCA Cleanup Levels		5.0 ug/L	1,000 ug/L	700 ug/L	1,000 ug/L



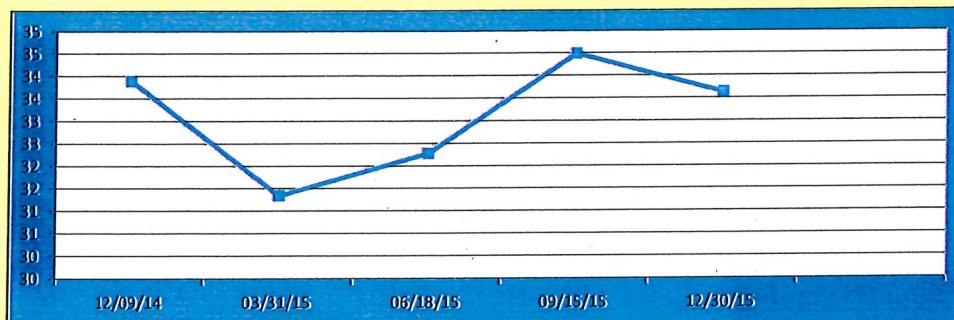
Groundwater Monitoring Well Analytical Results - VCP NW 2555

Lynnwood Auto Body, 19230 Hwy 99, Lynnwood, Washington

Monitoring Well 1 (Asphalt Lot and Driveway, east of building office area)

Well Depth	Sampling Date	Ground Water Level	GRO	DRO Kerosene/ Diesel	DRO Heavy Oil	Benzene	Toluene	Ethyl-benzene	Xylenes	Total Lead	PAH	Chlorinated VOCs
Feet		Depth TOC* (Feet)	NWTPH-Gx	NWTPH-Dx	NWTPH-Dx	EPA8021B	EPA8021B	EPA8021B	EPA8021B	EPA7010	EPA8270	8260B
55	12/09/14	33.90	<100	<200	<200	<1.0	<1.0	<1.0	<1.0	---	<1.0	---
	03/31/15	31.35	<100	<200	<500	<1.0	<1.0	<1.0	<1.0	---	<1.0	---
	06/18/15	32.28	<100	<200	<500	<1.0	<1.0	<1.0	<1.0	---	---	---
	09/15/15	34.50	<100	<200	<500	<1.0	<1.0	<1.0	<1.0	<2.0	<1.0	ND
	12/30/15	33.64	<100	<200	<500	<1.0	<1.0	<1.0	<1.0	<2.0	<1.0	---
MTCA Method A Cleanup Limit			800 mg/L	200 mg/L	500 mg/L	5 ug/L	700 ug/L	1,000 ug/L	1,000 ug/L	15 ug/L	0.1ug/L	Varies

Hydrograph



MW-1

TABLE 3 Aldercrest-Results WATER (EIM April 2016).xls

Study Specific Loca	Field Collect	Fid	Fiel	Fie	Sample ID	Sample Source	Result Parameter Name	Lab Analy	Result Value	Unit Value	Result Report	Result	Rel Fraction	Result Method
NW2555-SB-1	7/27/2011	#	14	fl	SB-1-W	Groundwater	#1 Diesel	8/3/2011	40000.00	ug/L	250	MRL	Total	NWTPH-DX
NW2555-SB-1	7/27/2011	#	14	fl	SB-1-W	Groundwater	Heavy Fuel Oil	8/3/2011	500.00	ug/L	500	MRL	Total	NWTPH-DX
NW2555-SB-1	7/27/2011	#	14	fl	SB-1-W	Groundwater	Gasoline Range Organics	8/3/2011	59000.00	ug/L	100	MRL	Total	NWTPH-GX
NW2555-SB-1	7/27/2011	#	14	fl	SB-1-W	Groundwater	Benzene	8/3/2011	1.00	ug/L	1	MRL	Total	NWTPH-GX
NW2555-SB-1	7/27/2011	#	14	fl	SB-1-W	Groundwater	Ethylbenzene	8/3/2011	1.00	ug/L	1	MRL	Total	NWTPH-GX
NW2555-SB-1	7/27/2011	#	14	fl	SB-1-W	Groundwater	Toluene	8/3/2011	1.00	ug/L	1	MRL	Total	NWTPH-GX
NW2555-SB-1	7/27/2011	#	14	fl	SB-1-W	Groundwater	Xylenes	8/3/2011	3.00	ug/L	3	MRL	Total	NWTPH-GX
NW2555-SB-1	7/27/2011	#	14	fl	SB-1-W	Groundwater	Lead	8/3/2011	5.20	ug/L	2	MRL	Total	SW8200
NW2555-SB-3	7/27/2011	#	11	fl	SB-3-W	Groundwater	#1 Diesel	8/3/2011	30000.00	ug/L	250	MRL	Total	NWTPH-DX
NW2555-SB-3	7/27/2011	#	11	fl	SB-3-W	Groundwater	Heavy Fuel Oil	8/3/2011	500.00	ug/L	500	MRL	Total	NWTPH-DX
NW2555-SB-3	7/27/2011	#	11	fl	SB-3-W	Groundwater	Gasoline Range Organics	8/3/2011	2000.00	ug/L	100	MRL	Total	NWTPH-GX
NW2555-SB-3	7/27/2011	#	11	fl	SB-3-W	Groundwater	Benzene	8/3/2011	2.40	ug/L	1	MRL	Total	NWTPH-GX
NW2555-SB-3	7/27/2011	#	11	fl	SB-3-W	Groundwater	Ethylbenzene	8/3/2011	1.40	ug/L	1	MRL	Total	NWTPH-GX
NW2555-SB-3	7/27/2011	#	11	fl	SB-3-W	Groundwater	Toluene	8/3/2011	1.00	ug/L	1	MRL	Total	NWTPH-GX
NW2555-SB-3	7/27/2011	#	11	fl	SB-3-W	Groundwater	Xylenes	8/3/2011	3.00	ug/L	3	MRL	Total	NWTPH-GX
NW2555-MW-1	3/31/2015	#	31	fl	MW-1	Groundwater	#1 Diesel	4/2/2015	0.20	ug/L	0.20	MRL	Total	NWTPH-DX
NW2555-MW-1	3/31/2015	#	31	fl	MW-1	Groundwater	Heavy Fuel Oil	4/2/2015	0.50	ug/L	0.50	MRL	Total	NWTPH-DX
NW2555-MW-1	3/31/2015	#	31	fl	MW-1	Groundwater	Gasoline Range Organics	4/2/2015	100.00	ug/L	100.00	MRL	Total	NWTPH-GX
NW2555-MW-1	3/31/2015	#	31	fl	MW-1	Groundwater	Benzene	4/2/2015	1.00	ug/L	1.00	MRL	Total	SW8021B
NW2555-MW-1	3/31/2015	#	31	fl	MW-1	Groundwater	Ethylbenzene	4/2/2015	1.00	ug/L	1.00	MRL	Total	SW8021B
NW2555-MW-1	3/31/2015	#	31	fl	MW-1	Groundwater	Toluene	4/2/2015	1.00	ug/L	1.00	MRL	Total	SW8021B
NW2555-MW-1	3/31/2015	#	31	fl	MW-1	Groundwater	Xylenes	4/2/2015	1.00	ug/L	1.00	MRL	Total	SW8270
NW2555-MW-1	3/31/2015	#	31	fl	MW-1	Groundwater	Acenaphthylene	4/2/2015	0.50	ug/L	0.50	MRL	Total	SW8270
NW2555-MW-1	3/31/2015	#	31	fl	MW-1	Groundwater	Anthracene	4/2/2015	0.50	ug/L	0.50	MRL	Total	SW8270
NW2555-MW-1	3/31/2015	#	31	fl	MW-1	Groundwater	Benzo(a)anthracene	4/2/2015	0.50	ug/L	0.50	MRL	Total	SW8270
NW2555-MW-1	3/31/2015	#	31	fl	MW-1	Groundwater	Benzo(b)fluoranthene	4/2/2015	0.50	ug/L	0.50	MRL	Total	SW8270
NW2555-MW-1	3/31/2015	#	31	fl	MW-1	Groundwater	Benzo(k)fluoranthene	4/2/2015	0.50	ug/L	0.50	MRL	Total	SW8270
NW2555-MW-1	3/31/2015	#	31	fl	MW-1	Groundwater	Chrysene	4/2/2015	0.50	ug/L	0.50	MRL	Total	SW8270
NW2555-MW-1	3/31/2015	#	31	fl	MW-1	Groundwater	Dibenzo(a,h)anthracene	4/2/2015	0.50	ug/L	0.50	MRL	Total	SW8270
NW2555-MW-1	3/31/2015	#	31	fl	MW-1	Groundwater	Fluorene	4/2/2015	0.50	ug/L	0.50	MRL	Total	SW8270
NW2555-MW-1	3/31/2015	#	31	fl	MW-1	Groundwater	Fluoranthene	4/2/2015	0.50	ug/L	0.50	MRL	Total	SW8270
NW2555-MW-1	3/31/2015	#	31	fl	MW-1	Groundwater	Indeno(1,2,3-cd)pyrene	4/2/2015	0.50	ug/L	0.50	MRL	Total	SW8270
NW2555-MW-1	3/31/2015	#	31	fl	MW-1	Groundwater	Naphthalene	4/2/2015	0.50	ug/L	0.50	MRL	Total	SW8270
NW2555-MW-1	3/31/2015	#	31	fl	MW-1	Groundwater	1-Methylnaphthalene	4/2/2015	0.50	ug/L	0.50	MRL	Total	SW8270
NW2555-MW-1	3/31/2015	#	31	fl	MW-1	Groundwater	2-Methylnaphthalene	4/2/2015	0.50	ug/L	0.50	MRL	Total	SW8270
NW2555-MW-1	3/31/2015	#	31	fl	MW-1	Groundwater	Phenanthrene	4/2/2015	0.50	ug/L	0.50	MRL	Total	SW8270
NW2555-MW-1	3/31/2015	#	31	fl	MW-1	Groundwater	Pyrene	4/2/2015	0.50	ug/L	0.50	MRL	Total	SW8270
NW2555-MW-1	3/31/2015	#	31	fl	MW-1	Groundwater	Methyl t-butyl ether	4/2/2015	0.50	ug/L	0.50	MRL	Total	SW8270
NW2555-MW-1	3/31/2015	#	31	fl	MW-1	Groundwater	1,2-Dichloroethane	4/2/2015	0.50	ug/L	0.50	MRL	Total	SW8270
NW2555-MW-1	3/31/2015	#	31	fl	MW-1	Groundwater	1,2-Dibromoethane	4/2/2015	0.50	ug/L	0.50	MRL	Total	SW7010
NW2555-MW-1	3/31/2015	#	31	fl	MW-1	Groundwater	Lead	4/2/2015	2.00	ug/L	2.00	MRL	Total	NWTPH-DX
NW2555-MW-1	6/18/2015	#	31	fl	MW-1	Groundwater	#1 Diesel	6/22/2015	0.20	ug/L	0.20	MRL	Total	NWTPH-DX
NW2555-MW-1	6/18/2015	#	31	fl	MW-1	Groundwater	Heavy Fuel Oil	6/22/2015	0.50	ug/L	0.50	MRL	Total	NWTPH-DX
NW2555-MW-1	6/18/2015	#	31	fl	MW-1	Groundwater	Gasoline Range Organics	6/22/2015	100.00	ug/L	100.00	MRL	Total	NWTPH-GX
NW2555-MW-1	6/18/2015	#	31	fl	MW-1	Groundwater	Benzene	6/22/2015	1.00	ug/L	1.00	MRL	Total	SW8021B
NW2555-MW-1	6/18/2015	#	31	fl	MW-1	Groundwater	Ethylbenzene	6/22/2015	1.00	ug/L	1.00	MRL	Total	SW8021B
NW2555-MW-1	6/18/2015	#	31	fl	MW-1	Groundwater	Toluene	6/22/2015	1.00	ug/L	1.00	MRL	Total	SW8021B
NW2555-MW-1	6/18/2015	#	31	fl	MW-1	Groundwater	Xylenes	6/22/2015	1.00	ug/L	1.00	MRL	Total	SW8021B
NW2555-MW-1	6/18/2015	#	31	fl	MW-1	Groundwater	#1 Diesel	9/18/2015	0.20	ug/L	0.20	MRL	Total	NWTPH-DX
NW2555-MW-1	9/15/2015	#	31	fl	MW-1	Groundwater	Heavy Fuel Oil	9/18/2015	0.50	ug/L	0.50	MRL	Total	NWTPH-DX
NW2555-MW-1	9/15/2015	#	31	fl	MW-1	Groundwater	Gasoline Range Organics	9/18/2015	100.00	ug/L	100.00	MRL	Total	NWTPH-GX
NW2555-MW-1	9/15/2015	#	31	fl	MW-1	Groundwater	Benzene	9/18/2015	1.00	ug/L	1.00	MRL	Total	SW8021B
NW2555-MW-1	9/15/2015	#	31	fl	MW-1	Groundwater	Ethylbenzene	9/18/2015	1.00	ug/L	1.00	MRL	Total	SW8021B
NW2555-MW-1	9/15/2015	#	31	fl	MW-1	Groundwater	Toluene	9/18/2015	1.00	ug/L	1.00	MRL	Total	SW8021B
NW2555-MW-1	9/15/2015	#	31	fl	MW-1	Groundwater	Xylenes	9/18/2015	1.00	ug/L	1.00	MRL	Total	SW8021B
NW2555-MW-1	9/15/2015	#	31	fl	MW-1	Groundwater	Acenaphthylene	9/18/2015	0.50	ug/L	0.50	MRL	Total	SW8270
NW2555-MW-1	9/15/2015	#	31	fl	MW-1	Groundwater	Anthracene	9/18/2015	0.50	ug/L	0.50	MRL	Total	SW8270
NW2555-MW-1	9/15/2015	#	31	fl	MW-1	Groundwater	Benzo(a)anthracene	9/18/2015	0.50	ug/L	0.50	MRL	Total	SW8270
NW2555-MW-1	9/15/2015	#	31	fl	MW-1	Groundwater	Benzo(b)fluoranthene	9/18/2015	0.50	ug/L	0.50	MRL	Total	SW8270
NW2555-MW-1	9/15/2015	#	31	fl	MW-1	Groundwater	Benzo(k)fluoranthene	9/18/2015	0.50	ug/L	0.50	MRL	Total	SW8270
NW2555-MW-1	9/15/2015	#	31	fl	MW-1	Groundwater	Chrysene	9/18/2015	0.50	ug/L	0.50	MRL	Total	SW8270
NW2555-MW-1	9/15/2015	#	31	fl	MW-1	Groundwater	Dibenzo(a,h)anthracene	9/18/2015	0.50	ug/L	0.50	MRL	Total	SW8270
NW2555-MW-1	9/15/2015	#	31	fl	MW-1	Groundwater	Fluorene	9/18/2015	0.50	ug/L	0.50	MRL	Total	SW8270
NW2555-MW-1	9/15/2015	#	31	fl	MW-1	Groundwater	Fluoranthene	9/18/2015	0.50	ug/L	0.50	MRL	Total	SW8270
NW2555-MW-1	9/15/2015	#	31	fl	MW-1	Groundwater	Indeno(1,2,3-cd)pyrene	9/18/2015	0.50	ug/L	0.50	MRL	Total	SW8270
NW2555-MW-1	9/15/2015	#	31	fl	MW-1	Groundwater	Naphthalene	9/18/2015	0.50	ug/L	0.50	MRL	Total	SW8270
NW2555-MW-1	9/15/2015	#	31	fl	MW-1	Groundwater	1-Methylnaphthalene	9/18/2015	0.50	ug/L	0.50	MRL	Total	SW8270
NW2555-MW-1	9/15/2015	#	31	fl	MW-1	Groundwater	2-Methylnaphthalene	9/18/2015	0.50	ug/L	0.50	MRL	Total	SW8270
NW2555-MW-1	9/15/2015	#	31	fl	MW-1	Groundwater	Phenanthrene	9/18/2015	0.50	ug/L	0.50	MRL	Total	SW8270
NW2555-MW-1	9/15/2015	#	31	fl	MW-1	Groundwater	Pyrene	9/18/2015	0.50	ug/L	0.50	MRL	Total	SW8270
NW2555-MW-1	9/15/2015	#	31	fl	MW-1	Groundwater	Methyl t-butyl ether	9/18/2015	0.50	ug/L	0.50	MRL	Total	SW8270
NW2555-MW-1	9/15/2015	#	31	fl	MW-1	Groundwater	1,2-Dichloroethane	9/18/2015	0.50	ug/L	0.50	MRL	Total	SW8270
NW2555-MW-1	9/15/2015	#	31	fl	MW-1	Groundwater	1,2-Dibromoethane	9/18/2015	0.50	ug/L	0.50	MRL	Total	SW7010
NW2555-MW-1	9/15/2015	#	31	fl	MW-1	Groundwater	Lead	9/18/2015	2.00	ug/L	2.00	MRL	Total	SW8280C
NW2555-MW-1	9/15/2015	#	31	fl	MW-1	Groundwater	Tetrachloroethene	9/18/2015	1.00	ug/L	1.00	MRL	Total	SW8280C
NW2555-MW-1	9/15/2015	#	31	fl	MW-1	Groundwater	Bromodichloromethane	9/18/2015	1.00	ug/L	1.00	MRL	Total	SW8280C
NW2555-MW-1	9/15/2015	#	31	fl	MW-1	Groundwater	Bromopentane	9/18/2015	1.00	ug/L	1.00	MRL	Total	SW8280C
NW2555-MW-1	9/15/2015	#	31	fl	MW-1	Groundwater	Bromobenzene	9/18/2015	1.00	ug/L	1.00	MRL	Total	SW8280C
NW2555-MW-1	9/15/2015	#	31	fl	MW-1	Groundwater	Bromomethane	9/18/2015	1.00	ug/L	1.00	MRL	Total	SW8280C
NW2555-MW-1	9/15/2015	#	31	fl	MW-1	Groundwater	Carbon tetrachloride	9/18/2015	1.00	ug/L	1.00	MRL	Total	SW8280C
NW2555-MW-1	9/15/2015	#	31	fl	MW-1	Groundwater	Chlorobenzene	9/18/2015	1.00	ug/L	1.00	MRL	Total	SW8280C
NW2555-MW-1	9/15/2015	#	31	fl	MW-1	Groundwater	Chloroethane	9/18/2015	1.00	ug/L	1.00	MRL	Total	SW8280C
NW2555-MW-1	9/15/2015	#	31	fl	MW-1	Groundwater	Chloroform	9/18/2015	1.00	ug/L	1.00	MRL	Total	SW8280C
NW2555-MW-1	9/15/2015	#	31	fl	MW-1	Groundwater	Chloromethane	9/18/2015	1.00	ug/L	1.00	MRL	Total	SW8280C
NW2555-MW-1	9/15/2015	#	31	fl	MW-1	Groundwater	Dibromochloromethane	9/18/2015	0.01	ug/L	0.01	MRL	Total	SW8280C
NW2555-MW-1	9/15/2015	#	31	fl	MW-1	Groundwater	1,2-Dibromobenzene	9/18/2015	1.00	ug/L	1.00	MRL	Total	SW8280C
NW2555-MW-1	9/15/2015	#	31	fl	MW-1	Groundwater	1,3-Dichlorobenzene	9/18/2015	1.00	ug/L	1.00	MRL	Total	SW8280C
NW2555-MW-1	9/15/2015	#	31	fl	MW-1	Groundwater	1,4-Dichlorobenzene	9/18/2015	1.00	ug/L	1.00	MRL	Total	SW8280C
NW2555-MW-1	9/15/2015	#	31	fl	MW-1	Groundwater	1,1-Dichloroethane	9/18/2015	1.00	ug/L	1.00	MRL	Total	SW8280C
NW2555-MW-1	9/15/201													