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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
Southwest Region Office
PO Box 47775 • Olympia, WA 98504-7775 • 360-407-6300

June 26, 2025

John Wise
27th Street Apartments, LLC
6824 19th St W PMB 492
University Place, WA 98466-5528
johnwise@themetrolink.com

Re: No Further Action Likely opinion for the following Property associated with the Asarco Tacoma Smelter Site

Site name: 27th Street Apartments
Site address: 7216 27th Street West, University Place, WA 98466
Facility/Site ID: 1156837
Cleanup Site ID: 17232
VCP Project ID: SW1860

Dear John Wise:

On March 29, 2025, the Washington State Department of Ecology[1] (Ecology) received your initial request for an opinion regarding the sufficiency of your independent cleanup of the Property associated with the Asarco Tacoma Smelter Site (Asarco Site) under the Voluntary Cleanup Program[2] (VCP). On April 17, 2025, Ecology received your request to hold the opinion, and then received a follow up email on May 23, 2025 to re-start the opinion request. Thus, Ecology considers May 23, 2025 as the official start date for this opinion request.

This letter provides our opinion and analysis. We are providing this opinion under the authority of the Model Toxics Control Act (MTCA), chapter 70A.305 RCW.[3]

[1] https://ecology.wa.gov
[2] https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Voluntary-Cleanup-Program
[3] https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305

Opinion

Upon completion of your planned cleanup, Ecology has determined no further remedial action is likely necessary at the Property to clean up contamination associated with the Asarco Site. However, further remedial action is still needed elsewhere at the Asarco Site to clean up contamination.

For this opinion, it's important to distinguish between a "Site" and a "Property" under MTCA. A "Site" is defined by the area where a hazardous substance released to the environment has come to be located – the extent of contamination. A "Property" is simply the tax parcel(s) of real property that comprise a facility. Property boundaries are based on associated legal description information. As such, a site can affect multiple real property parcels, and a real property parcel can be part of multiple sites. A site can also be wholly contained within the real property parcel(s) comprising a Property.

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

Property identification

This opinion applies to only the Property described here and consists of the following real property parcels in Pierce County.

- 9435000074

Enclosure A includes the Property legal description, and other details of the Property, as currently known to Ecology.

Property and Asarco Site description

This opinion applies to only the Property described in this section. The Asarco Site is defined by the nature and extent of contamination associated with the following release(s).

- Arsenic in soil.

[4] https://apps.leg.wa.gov/WAC/default.aspx?cite=173-340

Enclosure B includes the Asarco Site description, history, and supportive diagrams, as currently known to Ecology.

The Willow Tree Gardens facility (FSID 1156837), a former nursery, also operated on the Property. Soil sampling for herbicides and pesticides did not show a release for these contaminants at the Property. This opinion does not apply to any contamination associated with the Willow Tree Gardens facility.

Ecology has no information indicating other sites affect any portion of the Property.

Basis for the opinion

Ecology bases this opinion on the following documents.

- EcoCon, Inc., *Tacoma Smelter Plume Arsenic & Lead Soil Investigation (Revised June 6, 2025),* June 6, 2025.
- EcoCon, Inc., *Cleanup Action Plan (CAP) Tacoma Smelter Plume Arsenic & Lead Soil Investigation*, November 7, 2022.
- EcoCon, Inc., Tacoma Smelter Plume Arsenic & Lead Soil Investigation, September 1, 2022.

You can request these documents by filing a records request.[5] For help making a request, contact the Public Records Officer at recordsofficer@ecy.wa.gov or call (360) 407-6040. Before making a request, check if the documents are available on the 27th Street Apartments webpage.[6]

This opinion is void if anything in the documents is materially false or misleading.

[5] https://ecology.wa.gov/About-us/Accountability-transparency/Public-records-requests
[6] https://apps.ecology.wa.gov/cleanupsearch/site/17237

Analysis of the cleanup

Ecology has determined, upon completion of your planned cleanup, no further remedial action will likely be necessary on the Property to clean up contamination associated with the Asarco Site, although further cleanup action still may be needed elsewhere at the Asarco Site. Ecology bases this conclusion on the following analysis.

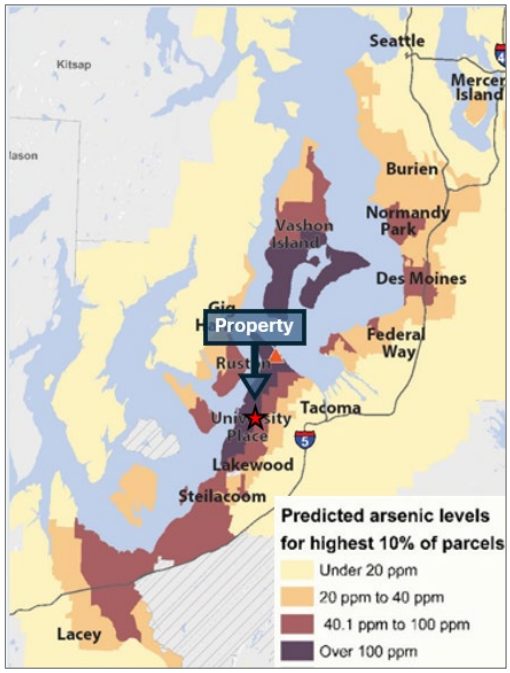

Figure 1. Vicinity Map

Characterizing the Property

Ecology has determined your Property characterization appears to be sufficient for setting cleanup standards for the Asarco Site and selecting a cleanup action for the Property.

The 27th Street Apartments property (Property) is located west of Interstate 5, and south of Highway 16 in a mixed-use commercial and residential area of University Place, Washington (Figure 1). In 2024, the Property underwent parcel boundary adjustments. The planned development includes one Pierce County Tax parcel, totaling approximately 5.9 acres.

Several single-family structures and commercial/agricultural buildings exist on-site currently, which are to be demolished prior to new construction. Historically, the Property has also been used as a nursery, which included both indoor and exterior growing operations, and operated as a landscaping nursery and landscaping material storage.

For more information about the Property, refer to Enclosure A.

The property is planned for redevelopment into a multi-family residential development.

The intended use of the Property is for multi-family residential development. The Property was sampled as one, approximately six-acre decision unit. Characterization soil samples were collected from the property during four sampling events (Figure 2).

On December 2, 2021, EcoCon, Inc., (ECI) performed soil sampling on part of the Property. Seven soil samples were collected from 6 to 12 inches below ground surface (bgs) and analyzed for arsenic and lead.

On December 22, 2021, ECI returned to the property and collected six soil samples from 0 to 6 inches bgs.

On July 27, 2022, ECI collected an additional 25 soil samples. Twenty-two soil samples were collected from 0 to 6 inches bgs, and three soil samples were collected from 6 to 12 inches.

On August 23, 2022, ECI collected three additional soil samples at 0 to 6 inches bgs.

During the 2021 and 2022 sampling events, a total of 31 samples were collected from the 0 to 6 inch depth. A total of 10 samples were collected from the 6 to 12 inch depth and analyzed for arsenic and lead using EPA Method 7010 Series. This analysis method is a deviation from our Tacoma Smelter Plume Model Remedies Guidance[7] (TSP Guidance), however, the results of samples analyzed using the 7010 Series are consistent with additional samples collected from the Property in June 2025 and analyzed using the EPA Method 6020B (Enclosure C).

2021 and 2022 Property Characterization Sample Results

At 0 to 6 inches bgs, arsenic exceeded the MTCA Method A cleanup level of 20 milligrams per kilogram (mg/kg) in three samples. One of those samples exceeded the maximum allowable concentration for a single soil sample, or twice the cleanup level for arsenic (40 mg/kg) at sample location S33-G6-6. The arsenic concentrations ranged from <5 mg/kg to 48 mg/kg. The average arsenic concentration was 9.8 mg/kg. None of the samples exceeded the MTCA Method A cleanup level of 250 mg/kg for lead. Lead concentrations ranged from <5 mg/kg to 51 mg/kg. The average lead concentration was 13.8 mg/kg.

At 6 to 12 inches bgs, arsenic exceeded the MTCA Method A cleanup level of 20 mg/kg in one sample. That one sample also exceeded the maximum allowable concentration for a single soil sample, or twice the cleanup level for arsenic (40 mg/kg) at sample location S9-B6-12. The arsenic concentrations ranged from <5 mg/kg to 41 mg/kg. The average arsenic concentration was 11.3 mg/kg. None of the samples exceeded the MTCA Method A cleanup level of 250 mg/kg for lead. Lead concentrations ranged from <5 mg/kg to 88 mg/kg. The average lead concentration was 13.4 mg/kg.

In samples where the analysis results were below the reporting limit, half the value of the reporting limit was used for calculating averages (Table 1).

[7] https://apps.ecology.wa.gov/publications/SummaryPages/1909101.html

June 2025 Property Characterization Sample Results

At the request of Ecology, on June 1, 2025, ECI collected an additional 15 soil samples at 0 to 6 inches bgs from the Property (Figure 2). These additional soil samples bring the total number of soil samples for a six-acre Property of this size into alignment with our TSP Guidance.

At 0 to 6 inches bgs, arsenic exceeded the MTCA Method A cleanup level of 20 milligrams per kilogram (mg/kg) in one sample. No samples exceeded the maximum allowable concentration for a single soil sample, or twice the cleanup level for arsenic (40 mg/kg). The arsenic concentrations ranged from 2.6 mg/kg to 32 mg/kg. The average arsenic concentration was 9.3 mg/kg. None of the samples exceeded the MTCA Method A cleanup level of 250 mg/kg for lead. Lead concentrations ranged from 6.2 mg/kg to 47 mg/kg. The average lead concentration was 23.2 mg/kg.

The June 2025 soil samples were analyzed using EPA Method 6020B. Generally, the results of the 2025 sampling are consistent with the analysis results from the 2021 and 2022 sampling events analyzed using the EPA Method 7010. See Table 1, Table 2, and Enclosure C.

Table 1. Summary of 2021 and 2022 characterization soil sample results using EPA Method 7010.

Depth (inches)	Analysis Method	Arsenic Minimum (mg/kg)	Arsenic Maximum (mg/kg)	Arsenic Average (mg/kg)	Lead Minimum (mg/kg)	Lead Maximum (mg/kg)	Lead Average (mg/kg)
0-6	7010 Series	<5	**48**	9.7	<5	51	13.4
6-12	7010 Series	<5	**41**	11.3	<5	88	24.5
MTCA Method A Cleanup			40	20		500	250

Bold values represent concentrations above the MTCA Method A Cleanup level.
Bold red values represent concentrations twice the MTCA Method A cleanup level for unrestricted land use.

Table 2. Summary of 2025 characterization soil sample results using EPA Method 6020B.

Depth (inches)	Analysis Method	Arsenic Minimum (mg/kg)	Arsenic Maximum (mg/kg)	Arsenic Average (mg/kg)	Lead Minimum (mg/kg)	Lead Maximum (mg/kg)	Lead Average (mg/kg)
0-6	6020B	2.6	**32**	9.3	6.2	47	23.2
MTCA Method A Cleanup			40	20		500	250

Bold values represent concentrations above the MTCA Method A Cleanup level.

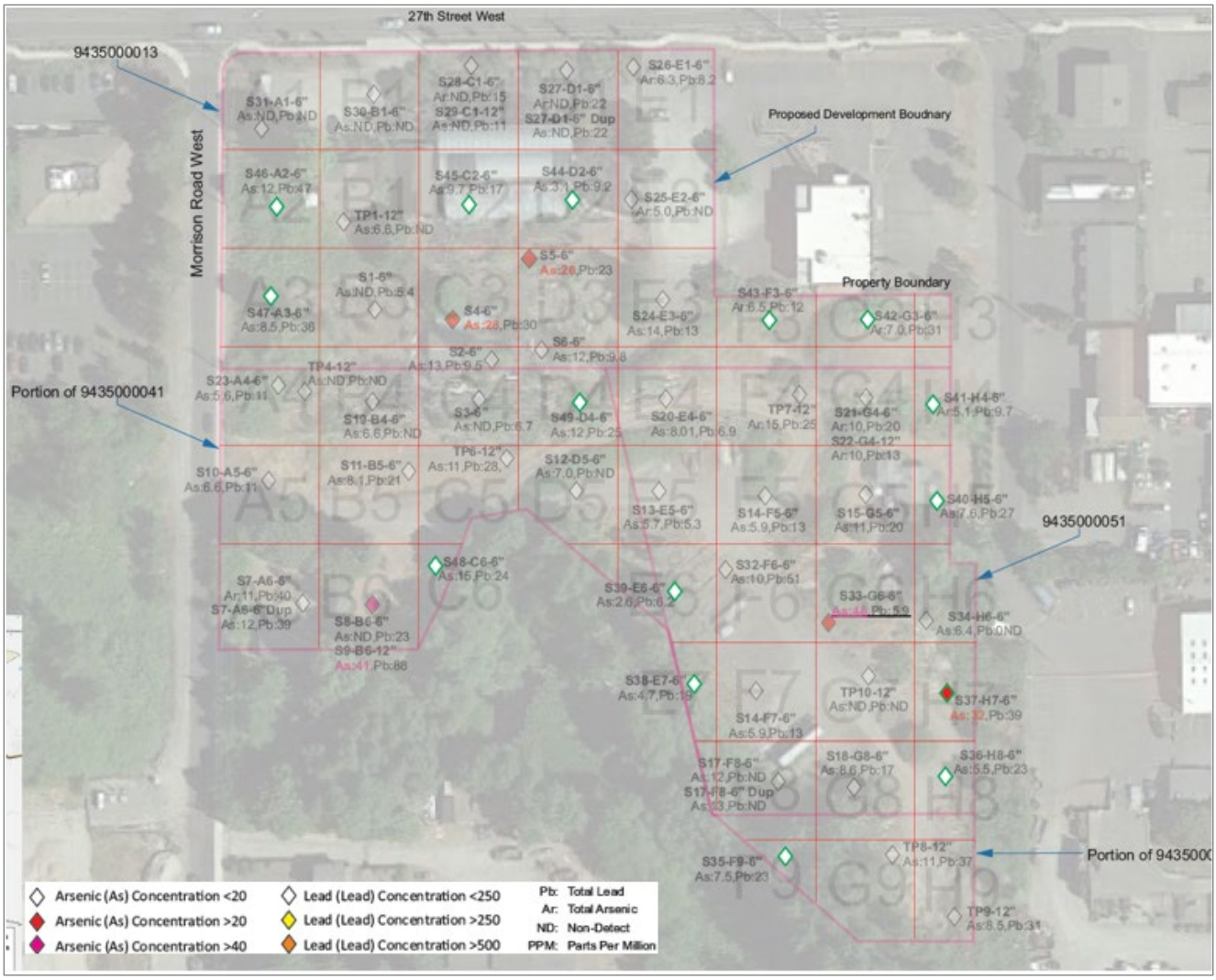

Figure 2. Approximate soil characterization sample locations

Setting cleanup standards for the Asarco Site

Cleanup standards include cleanup levels, points of compliance, and other requirements. Asarco Site cleanup levels applied to the Property meet the substantive requirements of MTCA. Other requirements also apply to the cleanup action based on the type of action or location of the Site and Property.

As part of the Interim Action Plan for the Asarco Tacoma Smelter Site (June 2012) (IAP), Ecology completed a terrestrial ecological evaluation for properties with only Tacoma Smelter Plume contamination. Ecology determined the MTCA Method A cleanup levels for both arsenic and lead were protective of both human health and the environment. The MTCA Method A cleanup levels for soil are as follows:

- Arsenic is 20 mg/kg.
- Lead is 250 mg/kg.

The IAP determined that the soil and duff cleanup levels are protective of human health and the environment for properties within the Asarco Tacoma Smelter Site are the following:

- Average arsenic detected in the soil is less than 20 mg/kg.
- Average lead detected in the soil is less than 250 mg/kg.
- Duff composite sample is less than 20 mg/kg for arsenic.
- Duff composite sample is less than 250 mg/kg for lead.
- No single soil sample has arsenic above 40 mg/kg.
- No single soil sample has lead above 500 mg/kg.

Selecting the cleanup action

Ecology has determined the cleanup action you selected for the Property will likely meet the cleanup standards discussed in the "Setting cleanup standards for the Asarco Site" subsection. Your planned cleanup meets minimum cleanup requirements and likely won't exacerbate conditions or preclude reasonable cleanup alternatives elsewhere at the Asarco Site.

Ecology proposed four model remedies in the IAP:

- Excavation and removal.
- Mixing.
- Capping in place.
- Consolidation and capping.

Implementing the cleanup action

The planned Property cleanup actions will likely meet minimum requirements and should not make conditions worse or limit other reasonable cleanup alternatives elsewhere at the Asarco Site. However, additional cleanup will still be needed at other areas of the Asarco Site after your

planned cleanup is completed. This cleanup is an interim action for the overall Asarco Site cleanup.

The Property developer, 27th Street Apartments, LLC (27th Street), decided to use excavation and removal for the locations identified as having elevated arsenic concentrations. Two areas with arsenic concentrations exceeding 40 mg/kg will be excavated and removed from the Property, adhering to the TSP Guidance. The TSP Guidance does not require remediation of arsenic results over 20 mg/kg but less than 40 mg/kg, as long as the average arsenic concentration for the Property is less than 20 mg/kg. The average arsenic concentrations on the Property is below 20 mg/kg. All soil with elevated results will be excavated and stockpiled prior to transport and disposal at a properly licensed disposal facility. Each excavation area is anticipated to be 20 feet by 20 feet, to a depth of 12 to 24 inches.

Compliance Sampling

Following soil excavation operations, compliance samples will be collected. Soil will be collected from the excavation side walls and floor of excavations. The sampling interval will be at ten-foot intervals from each sidewall and one sample from the floor of the excavation every 100 square feet (10' square). Each discrete sample will be analyzed for total arsenic and total lead using the appropriate analytical methodology. Thirty-two compliance samples are anticipated from the four excavation areas.

In the event a sample is reported exceeding the applicable CUL, the excavation will be extended and additional five feet, the soil stockpiled and prepared for transport and disposal, then the base of the excavation resampled. This process will continue until sample results are reported below the applicable CUL.

Ecology has determined your planned Property cleanup will likely meet cleanup standards of the Asarco Site.

This opinion letter does not apply to the following items:

- Any completed soil remediation. Ecology understands some of the hotspots have been removed from the Property as of the date of this letter, and a Cleanup Action Report has been submitted to Ecology for review. However, our opinion on the Property cleanup will be addressed in a future opinion letter.
- Any investigation or review regarding the past property uses as a Nursery, Willow Tree Gardens, Facility Site Identification (FSID) 1156837.

Environmental Information Management Database

In accordance with WAC 173-340-840(5) and Ecology Toxics Cleanup Program Policy 840[8] (Data Submittal Requirements), data generated for Independent Remedial Actions will need to be confirmed as uploaded, accepted, and approved in Ecology's Environmental Information Management (EIM) database prior to issuing a no further action (NFA) determination. For additional information regarding electronic format requirements, see the website http://www.ecy.wa.gov/eim.

Be advised that according to the policy, any reports containing sampling data that are submitted for Ecology review are considered incomplete until the electronic data has been entered. Please ensure that data generated during on-site activities is submitted pursuant to this policy.

Data must be submitted to Ecology in this format for Ecology to issue an NFA determination. Please be sure to submit all soil data collected to date, as well as any future data, in this format.

Cleanup of the Asarco Site as a Whole

Ecology has determined your planned Property cleanup will likely meet cleanup standards of the Asarco Site. While your proposed cleanup may constitute the final action for the Property, it will constitute only an **"interim action"** for the Asarco Site as a whole.

Limitations of the opinion

Opinion doesn't 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 doesn't resolve or alter a person's liability to the state or protect liable persons from contribution claims by third parties.

To settle liability with the state and obtain protection from contribution claims, a person must enter into a consent decree with Ecology under RCW 70A.305.040(4).[9]

Opinion doesn't constitute a determination of substantial equivalence

To recover remedial action costs from other liable persons under MTCA, one must demonstrate the action is the substantial equivalent of an Ecology-conducted or Ecology-supervised action.

[8] https://apps.ecology.wa.gov/publications/SummaryPages/1609050.html
[9] https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.040

This opinion does not determine whether the action you performed is substantially equivalent. Courts make that determination. See RCW 70A.305.080[10] and WAC 173-340-545.[11]

State is immune from liability

The state, Ecology, and its officers and employees are immune from all liability, and no cause of action of any nature may arise from any act or omission in providing this opinion. See RCW 70A.305.170(6).[12]

Contact us for more information

Thank you for choosing to clean up your Property under the VCP. After addressing our comments, you may request another review of your cleanup activities. If you have any questions about this opinion, please contact me at 360-999-9593 or diana.ison@ecy.wa.gov.

Sincerely,

Diana Ison

Diana Ison
Toxics Cleanup Program
Southwest Region Office
DI / kw

Encl: A — Property description
B — Asarco Site description, history, and diagrams
C — Soil Characterization Results

cc: Stephen Spencer, EcoCon, Inc, Stephen@Alleci.com
Kevin Briske, City of University Place, kbriske@cityofup.com
Marian Abbett, PE, Ecology, marian.abbett@ecy.wa.gov
Tim Mullin, LHG, Ecology, tim.mullin@ecy.wa.gov
Ecology Project File

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

Enclosure A

Property description

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Legal Property Description

Parcel 9435000074 (5.900 acres): Section 10 Township 20 Range 02 Quarter 42 WEST END ACRE ADD: PARCEL A OF BLA 2024-11-14-5004 TR A OF WEST END ACRE ADD EXC S 200 FT OF N 220 FT OF W 200 FT OF E 220 FT OF SD TR A ALSO EXC THAT POR OF TR A SUBTENDED BY & LY WITHIN FOLL DESC LIMITS: W LI OF E 20 FT OF SD TR A LY TO E & W LI OF N 20 FT OF SD TR A LY TO N & AN ARC LY TO SW BEING CONCAVE TO SW & HAVING A 20 FT RAD ALSO EXC THAT POR THEREOF DEEDED TO P CO FOR ROW FOR 27TH ST W PER ETN 4016196 & AFN 85-02-21-0400 ALSO THAT POR DEEDED TO P CO FOR ROW PURPOSES FOR MORRISON RD PER AFN 2070360 & 85-02-1-0401 & EXC THAT POR THEREOF DEEDED TO P CO FOR ROW FOR ROCHESTER RD PER AFN 85-02-21-0399 TOG/W FOLL DESC POR DESC AS FOLL COM AT NW COR OF TR B OF SD WEST END ACRE ADD TH S 89 DEG 32 MIN 27 SEC E 20 FT TO POB TH CONT 597.22 FT TH S 01 DEG 09 MIN 43 SEC W 121.78 FT TH S 89 DEG 29 MIN 49 SEC E 20 FT TH S 01 DEG 09 MIN 43 SEC W 351.45 FT TH N 89 DEG 35 MIN 04 SEC W 74.42 FT TH N 01 DEG 15 MIN 19 SEC W 20.59 FT TH N 05 DEG 41 MIN 40 SEC W 46 FT TH N 10 DEG 04 MIN 06 SEC W 38 FT TH N 26 DEG 47 MIN 58 SEC W 41 FT TH N 41 DEG 59 MIN 08 SEC W 24 FT TH N 58 DEG 49 MIN 12 SEC W 31 FT TH N 38 DEG 22 MIN 38 SEC W 45 FT TH N 22 DEG 33 MIN 48 SEC W 26 FT TH N 37 DEG 12 MIN 27 SEC W 43 FT TH N 49 DEG 06 MIN 34 SEC W 22 FT TH N 27 DEG 07 MIN 37 SEC W 20 FT TH N 06 DEG 15 MIN 40 SEC W 45 FT TH N 23 DEG 28 MIN 01 SEC W 25 FT TH N 31 DEG 35 MIN 33 SEC W 35 FT TH N 48 DEG 55 MIN 48 SEC W 52 FT TH N 62 DEG 34 MIN 58 SEC W 58.44 FT TH S 81 DEG 34 MIN 27 SEC W 61.69 FT TH S 01 DEG 19 MIN 27 SEC W 58.1 FT TH S 31 DEG 19 MIN 18 SEC W 55.69 FT TH S 49 DEG 17 MIN 35 SEC W 61.85 FT TH N 30 DEG 44 MIN 43 SEC W 35.71 FT TH N 88 DEG 40 MIN 33 SEC W 93.35 FT TH N 01 DEG 19 MIN 27 SEC E 141.26 FT TO POB EASE OF REC OUT OF 943500-001-3, 004-1, 005-1 & 007-3 SEG 2025-0175 11/20/24 JP

General Property Description

The Property is located in an area of vacant land and commercial and residential developments within University Place, Washington. The Property is bounded to the north by 27th Street West, with residential and commercial developments beyond the road; to the south by Adriana Hess Wetland Park; to the west by Morrison Road West, with vacant land and commercial and residential developments beyond the road; and to the east by Rochester Road West, with commercial developments beyond.

According to the USGS, Steilacoom, Washington topographic maps (2017), the central elevation of the Property is approximately 320 feet above mean sea level (NAD83/WGS84). The ground surface (or topography) at the Subject Property and vicinity generally slopes to the south-southwest towards the Adriana Hess Wetlands adjoining the Subject Property to the south-southwest.

The Property is located within the Puget Sound Basin, which is classified as unconsolidated Pleistocene younger glacial drift. The glacial deposits predominantly consist of till, hard, blue gray to gray concrete-like mixture of clay, silt, sand, and gravel deposited as end or recessional moraine (United States Geological Survey, 2005). The Natural Resources Conservation Service (NRCS) Web Soil Survey describes the soils at the Subject Property as Dupont muck and Alderwood gravelly sandy loam.

Enclosure B

Asarco Site description, history, and diagrams

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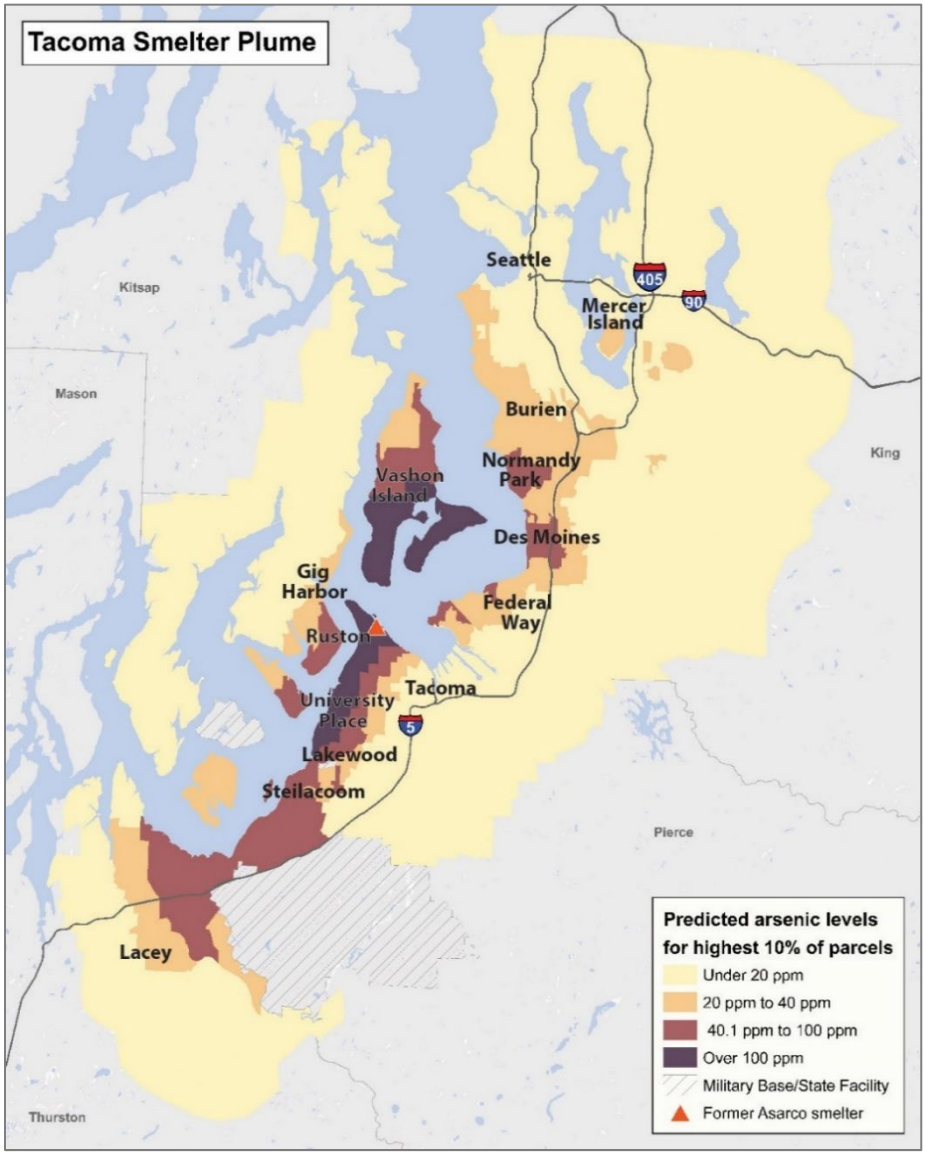
Asarco Tacoma Smelter Site Description



An interactive color map can be found at: https://dirtalert.info/

For almost 100 years, the Asarco Company operated a copper smelter in Tacoma. Air pollution from the smelter settled on the surface soil over a vast region—more than 1,000 square miles of the Puget Sound basin. Elevated levels of contamination are found as far south as the Nisqually Ridge and as far north as Seattle (West Seattle). Additionally, elevated levels of contamination are found as far west as the Kitsap Peninsula and as far east as Kent and Bellevue. Arsenic, lead, cadmium, and other heavy metals are still in the soil as a result of this pollution. The area has elevated levels of arsenic, lead, and cadmium in the soil due to air emissions from the Asarco smelter.

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Enclosure C

Soil Characterization Results

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Sample ID	EPA Analysis Method	Sample Date	Depth (inches)	Arsenic (mg/kg)	Lead (mg/kg)
S1-6	7010 Series	12/22/2021	0-6	<5	5.4
S2-6	7010 Series	12/22/2021	0-6	13	9.5
S3-6	7010 Series	12/22/2021	0-6	7.2	6.7
S4-6	7010 Series	12/22/2021	0-6	**28**	30
S5-6	7010 Series	12/22/2021	0-6	**26**	23
S6-6	7010 Series	12/22/2021	0-6	12	9.8
S7-A6-6	7010 Series	7/27/2022	0-6	11	40
S8-B6-6	7010 Series	7/27/2022	0-6	<5	23
S10-A5-6	7010 Series	7/27/2022	0-6	6.6	11
S11-B5-6	7010 Series	7/27/2022	0-6	8.1	21
S12-D5-6	7010 Series	7/27/2022	0-6	7.0	<5
S13-E5-6	7010 Series	7/27/2022	0-6	5.7	5.3
S14-F5-6	7010 Series	7/27/2022	0-6	5.9	13
S15-G5-6	7010 Series	7/27/2022	0-6	11	20
S16-F7-6	7010 Series	7/27/2022	0-6	<5	5
S17-F8-6	7010 Series	7/27/2022	0-6	12	<5
S18-G8-6	7010 Series	7/27/2022	0-6	8.6	17
S19-B4-6	7010 Series	7/27/2022	0-6	6.6	<5
S20-E4-6	7010 Series	7/27/2022	0-6	8.1	6.9
S21-G4-6	7010 Series	7/27/2022	0-6	10	20
S23-A4-6	7010 Series	7/27/2022	0-6	5.6	11
S24-E3-6	7010 Series	7/27/2022	0-6	14	13
S25-E2-6	7010 Series	7/27/2022	0-6	5.0	<5
S26-E1-6	7010 Series	7/27/2022	0-6	6.3	8.2
S27-D1-6	7010 Series	7/27/2022	0-6	<5	23
S28-C1-6	7010 Series	7/27/2022	0-6	<5	15
S30-B1-6	7010 Series	7/27/2022	0-6	<5	<5
S31-B1-6	7010 Series	7/27/2022	0-6	<5	<5
S32-F6-6	7010 Series	8/23/2022	0-6	10	51
S33-G6-6	7010 Series	8/23/2022	0-6	**48**	5.9
S34-H6-6	7010 Series	8/23/2022	0-6	6.4	<5
S35-F9-6	6020B	6/1/2025	0-6	7.5	23
S36-H8-6	6020B	6/1/2025	0-6	5.5	23
S37-H7-6	6020B	6/1/2025	0-6	**32**	39
S38-E7-6	6020B	6/1/2025	0-6	4.7	19
S39-E6-6	6020B	6/1/2025	0-6	2.6	6.2
S40-H5-6	6020B	6/1/2025	0-6	7.6	27
S41-H4-6	6020B	6/1/2025	0-6	5.1	9.7
S42-G3-6	6020B	6/1/2025	0-6	7.0	31
S43-F3-6	6020B	6/1/2025	0-6	6.5	12
S44-D2-6	6020B	6/1/2025	0-6	3.1	9.2

Sample ID	EPA Analysis Method	Sample Date	Depth (inches)	Arsenic (mg/kg)	Lead (mg/kg)
S45-C2-6	6020B	6/1/2025	0-6	9.7	17
S46-A2-6	6020B	6/1/2025	0-6	12	47
S47-A3-6	6020B	6/1/2025	0-6	8.5	36
S48-C6-6	6020B	6/1/2025	0-6	15	24
S49-D4-6	6020B	6/1/2025	0-6	12	25
TP1-1	7010 Series	12/8/2021	6-12	6.3	<5
TP4-1	7010 Series	12/8/2021	6-12	<5	<5
TP6-1	7010 Series	12/8/2021	6-12	11	28
TP7-1	7010 Series	12/8/2021	6-12	15	25
TP8-1	7010 Series	12/8/2021	6-12	11	37
TP9-1	7010 Series	12/8/2021	6-12	8.5	31
TP10-1	7010 Series	12/8/2021	6-12	<5	<5
S9-B6-12	7010 Series	7/27/2022	6-12	**41**	88
S22-G4-12	7010 Series	7/27/2022	6-12	13	13
S29-C1-12	7010 Series	7/27/2022	6-12	<5	15

Bold values represent concentrations above the MTCA Method A Cleanup level.

Bold red values represent concentrations twice the MTCA Method A cleanup level for unrestricted land use.