

## Groundwater Assessment

Stillwater Holdings Chevron Site  
7 East Rose Street  
Walla Walla, Washington

*for*

**Washington State Department of Ecology**

February 18, 2026

523 East Second Avenue  
Spokane, Washington 99202  
509.363.3125

**GEOENGINEERS** 

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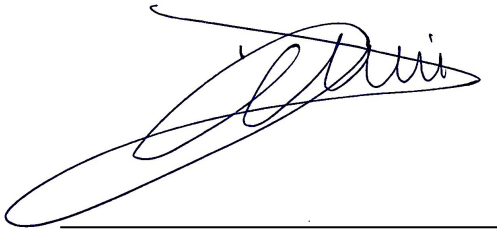
Prepared for:

Washington State Department of Ecology  
Toxics Cleanup Program, Eastern Region Office  
4601 North Monroe Street  
Spokane, Washington 99205

Attention: Elizabeth Kercher, LUST Project Manager

Prepared by:

GeoEngineers, Inc.  
523 East Second Avenue  
Spokane, Washington 99202  
509.363.3125



Lola Otoki, EIT  
Environmental Engineer



Melissa Roskamp, PE  
Project Engineer



Scott H. Lathen, PE  
Associate Environmental Engineer

MLK:JDO:MR:SHL:ljs:ijm

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## 1.0 Introduction

This report describes the December 2025 groundwater assessment conducted at Stillwater Holdings Chevron cleanup Site (herein referred to as “Site”), as shown in the Vicinity Map, Figure 1. The Site includes the Chevron gas station located at 7 East Rose Street, the Marcus Whitman Hotel located at 6 West Rose Street, and the 106 Building located at 106 North 2<sup>nd</sup> Avenue in Walla Walla, Washington, as shown in the Site Plan, Figure 2. The Washington State Department of Ecology (Ecology) reference numbers for this Site include Facility Site ID (FSID) Number (No.) 70525886 and Cleanup Site ID (CSID) No. 16913.

This assessment report has been prepared by GeoEngineers, Inc. (GeoEngineers) for Ecology under Ecology Master Contract No. C2500073. This report describes Site history, field activities, observations, and chemical analytical results associated with groundwater samples collected at the Site in December 2025. The purpose of this assessment is to act in compliance with Washington Administrative Code (WAC) 173-340-430 (Interim Actions) to reduce a threat to human health or the environment by eliminating or substantially reducing one or more pathways for exposure to contaminated groundwater. Data generated from this assessment, in combination with previous groundwater sampling data from the Site, will be used to support the development of the interim cleanup action.

## 2.0 Site Description and Background

In September 2023, Ecology was notified of gasoline odor complaints at the Marcus Whitman Hotel. It was determined that gasoline vapors were entering the hotel building via the basement and gasoline was present in groundwater beneath the hotel building. The basement underlies the original portion of the historic Marcus Whitman building and includes hotel operations and utility rooms (electrical, boiler, air handler, etc.).

In the east corner of the basement, a lower-level basement (referred to as the sub-basement) contains a partial dirt floor and contains a vault and groundwater sump, which were identified as likely preferential pathways for vapor to enter the basement. Gasoline contaminated groundwater was identified in the sump. Further investigation identified gasoline and gasoline contaminated water in two sumps and a vault in the adjacent 106 Building located across 2<sup>nd</sup> Avenue from the hotel. Emergency actions were taken to vent potentially explosive levels of volatile organic compounds (VOCs) and recover product from the sumps.

The Chevron gas station, located northeast of the Marcus Whitman and adjacent to the 106 Building, was identified as the source of the gasoline release. 13 monitoring wells were installed to delineate and monitor the release, as shown in Groundwater Assessment – December 2025, Figure 3. Four wells (AMW-01 through AMW-04) are located on the Chevron property. Nine wells (MW-1 through MW-9) are located nearby in the City of Walla Walla (City) Right-of-way. Chevron property wells, as well as MW-7 through MW-9, are 4 inches in diameter and MW-1 through MW-6 are 2 inches in diameter. The monitoring wells are installed in the shallow unconfined aquifer below the Site.

Emergency actions have continued at the Site since the identification of the release, including interception of contaminated groundwater in the sumps, treatment of contaminated groundwater using granular activated carbon (GAC), and discharging the treated groundwater to the municipal sewer. In May 2024, Stillwater Holdings, the owner of the Chevron gas station, petitioned Ecology to take over the continued remediation of the Site due to lack of funds.

Emergency interim action remains necessary at the site as unmitigated response to groundwater contamination or exposure to soil vapors would create a potential risk to public safety and could present a threat to the environment.

## 2.1 PREVIOUS INVESTIGATIONS

Assessment and remediation actions have been conducted at the Site since identification of the release in September 2023. Ecology and consultants hired by Stillwater Holdings have installed groundwater wells, implemented interim remediation measures, and monitored Site air and groundwater concentrations. Assessment and remediation actions have included:

- Using venting fans and isolation of rooms (sealed plastic sheets) to reduce VOC levels to less than the lower explosive limit (LEL) and mitigate risks to human health in the Marcus Whitman and the 106 Building;
- Intercepting groundwater in existing sumps within the Marcus Whitman and the 106 Building, where it is then manually removed and treated for VOCs prior to discharge to the Walla Walla publicly owned treatment works (POTW);
- Conducting indoor air sampling for VOCs in the 106 Building and the Marcus Whitman to evaluate the efficacy of the vapor ventilation systems in use at the properties;
- Sampling intercepted groundwater for VOCs and other constituents, following treatment by GAC, as required by the Industrial Pretreatment Program with the Walla Walla POTW;
- Installing and sampling 13 groundwater monitoring wells (AMW-01 through AMW-04 and MW-1 through MW-9) to delineate and monitor the impacts of the September 2023 release. The groundwater monitoring well network has been sampled by Ecology, Aspect Consulting (Aspect) or GeoEngineers for VOCs, lead, naphthalene, and product thickness in wells; and
- Conducting a preferential pathway investigation to determine pathways of soil vapor entering the 106 Building. The stormwater sump was identified as a soil vapor pathway to this building.

## 2.2 PRIOR ANALYTICAL RESULTS

Chemical analytical results from groundwater sampling between November 2023 and September 2025 indicated that gasoline-range petroleum hydrocarbons (GRPH) were frequently detected in five monitoring wells (AMW-01, AMW-02, AMW-04, MW-5, and MW-6) and occasionally detected in five monitoring wells (AMW-03, MW-2, MW-3, and MW-8) at concentrations greater than the Model Toxics Control Act (MTCA) Method A cleanup level (CUL) for GRPH. Petroleum-related VOCs, including BTEX and GRPH, were frequently detected in seven monitoring wells (AMW-01, AMW-02, AMW-03, AMW-04, MW-2, MW-5, and MW-6) and occasionally detected in three monitoring wells (MW-3, MW-8, and MW-9) concentrations greater than the MTCA Method A CULs.

Chlorinated solvents (CVOCs), including tetrachloroethene (PCE) and/or trichloroethene (TCE), were also detected in MW-7, MW-8, and MW-9 at concentrations near or greater than their respective MTCA Method A groundwater CULs in all events where CVOCs have been analyzed. There is no current or past known use of chlorinated solvents at the Site. Lead has not been detected in the groundwater samples. MW-1 was damaged shortly after installation and does not produce water and has not been sampled during any of the

quarterly monitoring events. Groundwater sampling events before March 2025 were performed by Ecology or Aspect.

## 3.0 Field Investigation Activities

The following sections describe field activities and a discussion of observed groundwater conditions during the December 2025 groundwater assessment.

### 3.1 GROUNDWATER AND SUMP WATER ASSESSMENT

Depth to water, presence of light non-aqueous phase liquid (LNAPL), and well headspace volatile organic vapor concentrations were measured prior to sample collection. Approximately, 0.15 inches of LNAPL were measured in MW-5. Headspace vapor concentrations ranged between less than 1 part per million (ppm) to 1,052 ppm (MW-5).

Groundwater samples were collected in monitoring wells AMW-01 through AMW-04 located on the Chevron property and monitoring wells MW-2 through MW-9 located on the City Right-of-way on December 17 and December 18, 2025. The monitoring wells were purged using low-flow techniques and groundwater quality parameters were monitored prior to sampling as described in Appendix A. Groundwater level measurements and groundwater quality parameters at the time of sample collection are summarized in Table 1, Summary of Groundwater Field Parameters. Depths to groundwater ranged between 9.10 feet below top of casing (btoc) in MW-3 to 14.08 feet btoc in MW-7. Groundwater elevations ranged between 936.55 feet in MW-7 and 943.13 feet in MW-6 and the groundwater gradient was to the southeast. Groundwater elevations and the groundwater gradient are shown in Figure 3.

One sample was additionally collected from the sump currently intercepting groundwater from beneath the Marcus Whitman Building (Marcus Whitman Sump) following the procedures described in Appendix A. One groundwater sample was obtained from the 106 Building Sump during the December 2025 groundwater monitoring event by Ecology's contractor, NWFF.

### 3.2 INVESTIGATION-DERIVED WASTE

Investigation-derived waste (IDW), including purge and decontamination water generated during groundwater sampling activities, was placed in the groundwater treatment system and discharged to the municipal sewer under permit with the Walla Walla POTW.

## 4.0 Chemical Analytical Results

The following sections describe groundwater and sump water chemical analytical results. The laboratory reports and a data validation report are included in Appendix B.

## 4.1 GROUNDWATER CHEMICAL ANALYTICAL RESULTS

12 groundwater samples and one duplicate groundwater sample from AMW-01 were submitted to Eurofins Environment Testing Northwest (Eurofins) in Spokane Valley, Washington, for chemical analysis of the following contaminants of concern (COCs):

- GRPH using Northwest Method NWTPH-Gx; and
- Benzene, toluene, ethylbenzene, and total xylenes (BTEX) and CVOCs (PCE, TCE, cis-1,2-dichloroethene [cDCE], trans-1,2-dichloroethene [tDCE], and vinyl chloride [VC]) using U.S. Environmental Protection Agency (EPA) Method 8260D.

Groundwater chemical analytical results are presented and compared to the MTCA Method A cleanup levels in Table 2, Chemical Analytical Results – Groundwater and are summarized below:

- GRPH was detected at concentrations greater than the MTCA Method A CUL of 800 micrograms per liter ( $\mu\text{g}/\text{L}$ ) when benzene is present on the Site in monitoring wells AMW-01, AMW-02, AMW-04, MW-2, MW-3, MW-5, MW-6, and MW-8. GRPH concentrations exceeding the MTCA Method A CUL ranged from 1,100  $\mu\text{g}/\text{L}$  in MW-2 to 23,000  $\mu\text{g}/\text{L}$  in MW-5. GRPH was either not detected or was detected at concentrations less than the MTCA Method A CUL in the remaining groundwater samples analyzed.
- Benzene was detected at concentrations greater than the MTCA Method A CUL of 5  $\mu\text{g}/\text{L}$  in monitoring wells AMW-01, AMW-02, AMW-03, AMW-04, MW-2, MW-3, MW-5, and MW-6. Benzene concentrations exceeding the MTCA Method A CUL ranged from 9.9  $\mu\text{g}/\text{L}$  in AMW-03 to 2,500  $\mu\text{g}/\text{L}$  in AMW-01. Benzene was either not detected or was detected at concentrations less than the MTCA Method A CUL in the remaining groundwater samples analyzed.
- Toluene was detected at concentrations greater the MTCA Method A CUL of 1,000  $\mu\text{g}/\text{L}$  in monitoring wells AMW-01, AMW-02, MW-5, and MW-6. Toluene concentrations exceeding MTCA Method A CUL ranged from 1,300  $\mu\text{g}/\text{L}$  in MW-6 to 2,400  $\mu\text{g}/\text{L}$  in MW-5. Toluene was either not detected or was detected at concentrations less than the MTCA Method A CUL in the remaining groundwater samples analyzed.
- Ethylbenzene was detected at 800  $\mu\text{g}/\text{L}$  and 890  $\mu\text{g}/\text{L}$  in MW-5 and AMW-01, respectively, and 780  $\mu\text{g}/\text{L}$  in the duplicate from AMW-01 greater than the MTCA Method A CUL of 700  $\mu\text{g}/\text{L}$ . Ethylbenzene was either not detected or was detected at concentrations less than the MTCA Method A CUL in the remaining groundwater samples analyzed.
- Total xylenes were detected at concentrations greater than the MTCA Method A CUL of 1,000  $\mu\text{g}/\text{L}$  in monitoring wells AMW-01, AMW-02, MW-5, and MW-6. Total xylenes concentrations exceeding the MTCA Method A CUL ranged from 1,100  $\mu\text{g}/\text{L}$  in AMW-02 to 4,800  $\mu\text{g}/\text{L}$  in MW-6. Total xylenes were either not detected or were detected at concentrations less than the MTCA Method A CUL in the remaining groundwater samples analyzed.
- PCE was detected at 77  $\mu\text{g}/\text{L}$  in MW-7, 920  $\mu\text{g}/\text{L}$  in MW-8, and 17  $\mu\text{g}/\text{L}$  in MW-9; greater than the MTCA Method A CUL of 5  $\mu\text{g}/\text{L}$ . PCE was either not detected or detected at concentrations less than the MTCA Method A CUL in the remaining groundwater samples analyzed.

- TCE was detected at 9.6 µg/L in MW-7 and 77 µg/L in MW-8; greater than the MTCA Method A CUL of 5 µg/L. TCE was either not detected or detected at concentrations less than the MTCA Method A CUL in the remaining groundwater samples analyzed.
- Other VOCs were either not detected or detected at concentrations less than their respective MTCA Method A CULs in the groundwater samples analyzed.

## 4.2 SUMP WATER CHEMICAL ANALYTICAL RESULTS

The sump water sample from the Marcus Whitman Sump was submitted to Eurofins and the sump water sample from the 106 Building was submitted to APEX Laboratories for GRPH and BTEX analysis using the methods listed above.

Sump water undergoes pretreatment prior to discharge to the Walla Walla POTW and these samples represent pretreatment concentrations.

Sump water chemical analytical results are presented and compared to MTCA Method A cleanup levels and the Walla Walla POTW Discharge Limits in Table 3, Chemical Analytical Results – Sump Water and are summarized below:

- GRPH was detected at 1,500 µg/L in Marcus Whitman Sump sample; greater than the MTCA Method A CUL of 800 µg/L and Walla Walla POTW discharge limits of 1,000 µg/L.
- Benzene was detected at 93 µg/L in Marcus Whitman Sump sample; greater than the MTCA Method A CUL of 5 µg/L and Walla Walla POTW discharge limits of 10 µg/L.
- Toluene, ethylbenzene, and xylenes were detected at concentrations less than their respective MTCA Method CULs.
- The 106 Building sump was sampled by Ecology's contractor, NWFF, on December 6, 2026. GRPH, toluene, ethylbenzene, and xylenes were all undetected at detection limits less than their respective MTCA Method CULs and Walla Walla POTW discharge limits.

## 5.0 Summary and Recommendations

12 monitoring wells and two sumps were sampled in December 2025 at the Stillwater Holdings Chevron Site in Walla Walla, Washington. Groundwater and sump water samples collected during the monitoring event were submitted for chemical analysis. Based on previous data collected at this Site, concentrations of GRPH and individual VOC concentrations were generally consistent with prior events for many wells on the Stillwater Holdings Chevron property. Certain off-property wells, particularly MW-3, MW-5, and MW-6, saw a rebound in concentrations. Wells MW-3 and MW-5 are immediately downgradient of the source area. This increase in concentration may be associated with season changes in groundwater elevation, which is at its highest in winter.

Laboratory analytical results indicate that petroleum contamination is present at this Site at concentrations greater than the MTCA Method A cleanup levels. The plume appears to be bounded in three directions by MW-4 to the north, MW-7 to the west, and MW-9 to the east. Exceedances of GRPH at MW-8 to the south indicate the plume may not be fully bounded by the monitoring well network in this direction, where there have been only low level GRPH concentrations detected. Although chlorinated solvents have been detected

in selected wells on the Site since April 2024, there has been no known use of chlorinated solvents at the Site. We recommend continued quarterly sampling of Site wells throughout the assessment and implementation of the interim cleanup action.

Petroleum contamination is present in the sump at the Marcus Whitman at concentrations greater than both the MTCA Method A cleanup levels and the Walla Walla POTW Discharge Limits, necessitating the continued need for pretreatment of sump water prior to discharge.

## 6.0 Limitations

We have prepared this report for the exclusive use of Washington State Department of Ecology and their authorized agents.

Within the limitations of scope, schedule and budget, our services were executed in accordance with generally accepted environmental science practices in this area at the time this report was prepared. The conclusions and opinions presented in this report are based on our professional knowledge, judgment and experience. No warranty or other conditions, express or implied, should be understood.

Please refer to Appendix C, Report Limitations and Guidelines for Use, for additional information pertaining to this report.

## 7.0 References

Draft Engineering Design Report Wastewater Treatment: Marcus Whitman Hotel—Wastewater Treatment System, dated May 8, 2024.

Marcus Whitman Hotel Vapor Intrusion Evaluation Workplan, dated March 27, 2024, and associated Memorandum between Aspect Consulting and Ecology, dated February 7, 2024.

Washington State Department of Ecology. 2013. "Model Toxics Control Act Regulation and Statute, Chapter 173-340 WAC and 70.105D RCW." Revised 2024.

## Tables

**Table 1**  
**Summary of Groundwater Field Parameters**  
 Stillwater Holdings Chevron Site  
 Walla Walla, Washington

Monitoring Well Location	Sample Date	Headspace Vapor Measurement (ppm)	Depth to Water (feet btoc)	Groundwater Elevation (feet)	Field Measured Groundwater Quality Parameters						
					pH (pH units)	Specific Conductivity (µS/cm)	ORP (mV)	Dissolved Oxygen (mg/L)	Turbidity (NTU)	Temperature (degrees C)	
Chevron Property wells	AMW-01				7.14	474.36	-182.1	0.6	14.6	13.58	
					6.91	1234.2	-135.8	0.21	25.4	16.97	
					6.65	864	-78.7	0.4	--	20.22	
					6.72	1226	-117.3	0.14	--	18.21	
		639.7	11.10	940.88	6.62	1290	-136.9	-0.09	9.4	17.4	
		94.1	12.22	939.76	6.69	1433	-137.8	0.06	17.63	18.7	
		4.0	12.07	939.91	6.52	1083	-111.9	0.10	3.07	19.5	
	0.3	11.38	940.60	6.66	2442	-125.6	0.17	3.53	17.1		
	AMW-02					7.26	616.82	145.8	0.4	6.69	16.37
						6.92	827.25	-111.4	0.17	5.74	16.46
						6.80	820	-73.2	1.7	--	18.64
						6.69	1347	-123.1	0.24	--	13.23
		17.6	11.71	941.57	6.71	1012	-118.8	0.14	2.95	16.9	
		0.4	12.81	940.47	6.85	1372	-122	0.17	2.33	17.7	
		0.5	12.68	940.60	6.80	1307	-128.9	0.16	1.95	19.0	
	0.5	12.04	941.24	6.79	2007	-110.3	0.17	2.20	17.3		
	AMW-03					7.17	470.38	-112	0.38	5.01	14.96
						6.82	538.87	36.8	0.3	9.95	14.93
						6.11	597	-22.6	24.8 %	--	18.20
						6.72	754	-25.6	0.42	--	16.38
		<1	13.60	938.83	6.70	693	30.6	1.45	3.62	17.5	
		0.8	14.73	937.70	6.80	796	-25.3	0.11	4.74	17.7	
		0.3	14.53	937.90	6.74	764	-75.5	0.09	3.65	18.8	
	0.1	13.97	938.46	6.69	1435	-27.3	1.30	2.06	16.6		
	AMW-04					7.01	408.91	-173	0.31	1.79	16.45
						7.03	607.78	-131.5	0.27	4.14	15.79
						6.88	594	-103.0	2.6	--	18.24
						7.10	557	-90.9	0.47	--	18.46
		<1	10.61	943.31	6.51	548	19.1	0.01	4.85	16.1	
		1.2	12.00	941.92	7.00	780	-160.9	0.11	8.6	16.9	
		0.4	11.98	941.94	6.90	699	-153.2	0.14	5.75	19.0	
	0.0	11.14	942.78	6.88	1433	-139.2	0.21	2.23	16.9		
	City Right-of-way Wells	MW-2				7.1	555.85	-94.4	0.38	2.96	12.72
						6.87	554.36	-77.3	0.39	24.2	15.93
						6.76	479	-44.6	1.9	--	17.67
						6.78	640	-75.0	0.19	--	15.37
<1			12.89	938.05	6.66	648	-74.8	0.10	5.58	16.9	
285			14.56	936.38	6.86	754	-81	0.11	6.31	18.1	
0.4			13.93	937.01	6.74	627	-74.7	0.08	2.72	17.7	
0.1		13.42	937.52	6.65	1325	19.9	0.11	4.75	16.9		
MW-3						7.19	617.85	50	0.37	7.88	12.63
						6.95	675.49	-1.8	0.73	10.7	15.91
						6.77	452	8.9	1.9	--	17.84
						7.07	440	-48.7	1.01	--	16.52
		98.1	9.56	941.26	6.84	975	131.6	-0.02	1.88	12.0	
		133	9.31	941.51	7.09	734	-144.9	0.07	4.17	18.1	
		3.5	9.14	941.68	6.73	709	-157.5	0.07	3.22	18.4	
0.0		9.20	941.62	6.91	1252	-159.0	0.11	4.09	16.9		
MW-4						6.59	365	203.1	1.54	1.27	13.65
						6.69	451.82	180.4	1.79	3.09	15.28
						6.70	443	100.4	6.9	--	18.99
						6.77	390	59.2	0.84	--	15.20
		<1	11.71	938.63	6.66	410	158.9	1.74	27.69	16.1	
		99.8	11.61	938.73	6.81	549	73.5	0.75	4.98	18	
		0.1	11.45	938.89	6.70	537	116.4	0.55	3.07	18.6	
0.0		11.32	939.02	6.71	890	25.6	0.56	8.13	17.3		
MW-5						6.6	887.38	-41.6	0.4	4.32	14.29
						7.11	718.49	-158.6	0.46	4.93	16.39
						6.97	551	-97.8	1.06	--	18.62
		397.0	10.92	940.93	6.86	792	-131.2	-0.05	3.47	15.6	
		942.0	11.20	940.65	7.21	658	-166.1	0.06	3.45	18.2	
		713.0	10.85	941.00							
		1052.0	11.05	940.80							
						Groundwater quality parameters not collected <sup>1</sup>					
		05/01/2024				6.76	418.53	-34.8	0.21	4.51	15.28
		11/14/2024				6.45	927	-84.6	1.47	--	19.04

Monitoring Well Location	Sample Date	Headspace Vapor Measurement (ppm)	Depth to Water (feet btoc)	Groundwater Elevation (feet)	Field Measured Groundwater Quality Parameters						
					pH (pH units)	Specific Conductivity (µS/cm)	ORP (mV)	Dissolved Oxygen (mg/L)	Turbidity (NTU)	Temperature (degrees C)	
MW-6	3/26/2025	1,672.0	8.42	943.98	6.51	454	61	0.29	42.84	14.8	
	6/24/2025	1,052.0	10.78	941.62	6.83	747	-127.6	0.08	2.77	17.9	
	9/15/2025	80.3	10.85	941.55	Groundwater quality parameters not collected <sup>1</sup>						
	12/17/2025	577.4	9.27	943.13							
City Right-of-way Wells (cont.)	MW-7	11/10/2023			6.82	214.66	141.9	3.88	3.31	13.9	
		04/30/2024			6.87	270.66	76.4	5.51	2.36	12.26	
		8/20/2024			6.82	237	162.5	2.47	--	17.40	
		11/13/2024			6.87	294	175.3	3.33	--	15.50	
		3/26/2025	-	13.61	937.02	6.29	295	118.2	6.52	1.42	12.6
		6/25/2025	1.0	15.18	935.45	6.86	339.5	73.7	4.26	2.84	15.6
		9/15/2025	0.5	15.23	935.40	6.67	337.4	117.5	2.38	7.57	18.2
		12/17/2025	0.2	14.08	936.55	6.74	672	63.4	2.60	2.27	14.8
	MW-8	11/10/2023				6.7	254.55	127	1.22	1.09	15.32
		05/01/2024				6.54	244.1	176	2.56	1.26	15.45
		8/20/2024				6.72	270	178.9	1.73	--	17.14
		11/13/2024				6.70	332	172.8	1.87	--	15.92
		3/26/2025	7.5	12.33	940.91	6.56	325	125.6	2.32	2.42	16.2
		6/25/2025	1.7	13.92	939.32	6.68	367	68.7	2.32	4.32	17.6
		9/15/2025	1.1	13.96	939.28	6.58	347.8	126.6	1.85	1.17	17.0
		12/17/2025	4.5	12.92	940.32	6.61	688	78.9	1.84	1.38	16.2
	MW-9	11/10/2023				6.61	411.35	84	0.62	2	16.04
		05/01/2024				6.70	461.28	198.5	5.09	8.52	13.8
		08/20/2024				6.60	453	172.9	3.4	--	17.21
		11/13/2024				6.70	415	137.7	1.47	--	16.10
		3/26/2025	3.9	10.50	942.07	6.68	454	114.6	6.05	1.31	14.6
		6/25/2025	17.2	13.21	939.36	6.64	541	57	0.67	4.51	17.4
		9/15/2025	1.1	13.30	939.27	6.48	518	111.8	0.53	3.10	17.9
		12/17/2025	1.3	11.75	940.82	6.67	890	75.6	4.19	3.86	16.4

Notes:

<sup>1</sup>Groundwater quality parameters not collected because light non-aqueous phase liquid (LNAPL) was detected in the monitoring well.

btoc = below top of casing

degrees C = degrees Celsius

mg/L = milligrams per liter

µS/cm = microSiemens per centimeter

ORP = oxidation-reduction potential

mV = millivolts

NTU = Nephelometric Turbidity Units

ppm = parts per million

*Italics* notes Ecology and Aspect data as reported to GeoEngineers on April 15, 2025

Data collected by GeoEngineers during the June and September 2025 groundwater assessment are dated 06/24/2025-06/25/2025 and 09/15/2025 - 09/16/2025, respectively.

**Table 2**  
**Chemical Analytical Results - Groundwater**  
 Stillwater Holdings Chevron Site  
 Walla Walla, Washington

Monitoring Well Location			Chevron Property Wells												Chevron Property Wells								
			AMW-01												AMW-02								
Sample Date			11/09/2023	05/01/2024	08/21/2024	11/13/2024	03/25/2025	(Dup) 03/25/2025	06/25/2025	(Dup) 06/25/2025	9/16/2025	(DUP) 9/16/25	12/18/2025	(DUP) 12/18/2025	11/09/2023	05/01/2024	8/21/2024	11/14/2024	03/25/2025	06/25/2025	09/16/2025	12/18/2025	
Analyte	Unit	MTCA <sup>6</sup> CUL																					
<b>Petroleum Hydrocarbons<sup>1</sup></b>																							
GRPH	µg/L	800	13,000	85,000	4,100	25,000	27,000	33,000	24,000	26,000	14,000	15,000	16,000	15,000	29,000	59,000	4,800	4,300	5,400	8,400	4,300	5,100	
<b>BTEX<sup>2</sup></b>																							
Benzene	µg/L	5	1,100	7,100	1,800	3,000	3,300	3,200	3,000	2,900	2,700	2,700	2,500	2,500	2,600	7,200	3,100	1,200	1,700	2,100	1,100	810	
Toluene	µg/L	1,000	2,300	21,000	5,600	5,500	8,700	8,500	1,800	1,800	350	360	2,100	2,000	4,800	15,000	4,700	1,400	3,200	590	96	1,600	
Ethylbenzene	µg/L	700	150	1,300	440	680	1,000	970	930	860	930	890	780	360	820	450	220	450	630	360	340		
Xylenes (Total)	µg/L	1,000	1,100	6,300	2,260	3,300	5,700	5,400	5,700	5,500	4,900	5,200	4,200	4,100	2,500	5,000	2,100	810	1,600	1,600	700	1,100	
<b>Metals<sup>3</sup></b>																							
Lead (dissolved)	µg/L	15	-	< 1.0 U	-	-	-	-	-	-	-	-	-	-	-	< 1.0 U	-	-	-	-	-	-	
<b>PAHs<sup>4</sup></b>																							
Naphthalene	µg/L	160	-	130	77	-	-	-	-	-	-	-	-	-	-	120	74	-	-	-	-	-	
<b>VOCs<sup>5</sup></b>																							
1,2,4-Trimethylbenzene	µg/L	80	-	510	210	-	-	-	-	-	-	-	-	-	-	580	250	-	-	-	-	-	
1,2-Dibromoethane (EDB)	µg/L	0.01	-	< 0.010 U	-	-	-	-	-	-	-	-	-	-	< 0.010 U	-	-	-	-	-	-	-	
1,2-Dichloroethane (EDC)	µg/L	5	-	< 2.0 U	< 1.0 U	-	-	-	-	-	-	-	-	-	< 2.0 U	< 1.0 U	-	-	-	-	-		
1,3,5-Trimethylbenzene	µg/L	80	-	130	47	-	-	-	-	-	-	-	-	-	160	64	-	-	-	-	-		
2-Chlorotoluene	µg/L	160	-	< 2.0 U	< 1.0 U	-	-	-	-	-	-	-	-	-	< 2.0 U	< 1.0 U	-	-	-	-	-		
4-Chlorotoluene	µg/L	160	-	< 2.0 U	< 1.0 U	-	-	-	-	-	-	-	-	-	< 2.0 U	< 1.0 U	-	-	-	-	-		
4-Methyl-2-pentanone	µg/L	640	-	15	NA	-	-	-	-	-	-	-	-	-	< 10 U	NA	-	-	-	-	-		
Acetone	µg/L	7,200	-	96 J	NA	-	-	-	-	-	-	-	-	-	< 25 U	NA	-	-	-	-	-		
cis-1,2-Dichloroethene (cDCE)	µg/L	16	-	< 2.0 U	< 1.0 U	-	-	-	< 1.0 U	< 1.0 U	< 1.0 U	< 1.0 U	< 1.0 U	< 1.0 U	< 2.0 U	< 1.0 U	-	-	< 1.0 U	< 1.0 U	< 1.0 U		
Hexachlorobutadiene	µg/L	8	-	< 2.0 U	< 2.0 U	-	-	-	-	-	-	-	-	-	< 2.0 U	< 2.0 U	-	-	-	-	-		
Isopropylbenzene (cumene)	µg/L	800	-	27	10	-	-	-	-	-	-	-	-	-	25	11	-	-	-	-	-		
m,p-Xylenes	µg/L	1,600	-	4,200	1,500	-	-	-	4,000	4,000	3,800	4,000	3,300	3,200	-	3,300	1,200	-	-	1,000	560	700	
Methyl tert-butyl ether (MTBE)	µg/L	20	-	< 2.0 U	< 1.0 U	-	-	-	-	-	-	-	-	-	< 2.0 U	< 1.0 U	-	-	-	-	-		
n-Butylbenzene	µg/L	400	-	< 2.0 U	< 1.0 U	-	-	-	-	-	-	-	-	-	< 2.0 U	< 1.0 U	-	-	-	-	-		
n-Propylbenzene	µg/L	800	-	76	32	-	-	-	-	-	-	-	-	-	62	36	-	-	-	-	-		
o-Xylene	µg/L	1,600	-	2,100	760	-	-	-	1,600	1,500	1,100	1,100	900	830	-	1,700	900	-	-	610	140	360	
p-Isopropyltoluene	µg/L	-	-	< 2.0 U	1	-	-	-	-	-	-	-	-	-	< 2.0 U	0.93 J	-	-	-	-	-		
sec-Butylbenzene	µg/L	800	-	4.0	3	-	-	-	-	-	-	-	-	-	2.6	1.5	-	-	-	-	-		
Styrene	µg/L	1,600	-	< 2.0 U	< 1.0 U	-	-	-	-	-	-	-	-	-	< 2.0 U	18	-	-	-	-	-		
tert-Butylbenzene	µg/L	800	-	< 2.0 U	1.1	-	-	-	-	-	-	-	-	-	< 2.0 U	< 1.0 U	-	-	-	-	-		
Tetrachloroethene (PCE)	µg/L	5	-	< 2.0 U	< 1.0 U	-	-	-	< 1.0 U	6.0 J	< 1.0 U	< 1.0 U	< 1.0 U	0.70 J	-	< 2.0 U	< 1.0 U	-	-	< 1.0 U	< 1.0 U		
trans-1,2-Dichloroethene	µg/L	160	-	< 2.0 U	< 1.0 U	-	-	-	< 1.0 U	< 1.0 U	< 1.0 U	< 1.0 U	< 1.0 U	< 1.0 U	< 2.0 U	< 1.0 U	-	-	< 1.0 U	< 1.0 U	< 1.0 U		
Trichloroethene (TCE)	µg/L	5	-	< 2.0 U	< 1.0 U	-	-	-	< 1.0 U	< 1.0 U	< 1.0 U	< 1.0 U	< 1.0 U	< 1.0 U	< 2.0 U	< 1.0 U	-	-	< 1.0 U	< 1.0 U	< 1.0 U		
Vinyl Chloride	µg/L	0.2	-	< 0.20 U	< 0.4 U	-	-	-	< 0.40 U	< 0.4 U	< 0.40 U	< 0.40 U	< 0.40 U	< 0.40 U	-	< 0.20 U	< 0.4 U	-	-	< 0.40 U	< 0.40 U		

Monitoring Well Location			Chevron Property Wells																
			AMW-03								AMW-04								
Sample Date			11/09/2023	05/01/2024	8/21/2024	11/13/2024	03/25/2025	06/25/2025	09/16/2025	12/18/2025	11/09/2023	05/01/2024	8/21/2024	11/14/2024	(Dup) 11/14/2024	03/25/2025	06/25/2025	09/16/2025	12/18/2025
Analyte	Unit	MTCA <sup>6</sup> CUL																	
<b>Petroleum Hydrocarbons<sup>1</sup></b>																			
GRPH	µg/L	800	7,300	62	660	300	73 J	130 J	70 J	92 J	9,100	39,000	13,000	6,400	5,200	420	3,300	3,500	4,100
<b>BTEX<sup>2</sup></b>																			
Benzene	µg/L	5	1,200	24	140	54	12	22	6.8	9.9	970	1,700	670	440	360	23	190	210	210
Toluene	µg/L	1,000	1,200	< 2.0 U	7.1	2	4.0	< 1.6 U <sup>7</sup>	< 1.0 U	0.93 J	1,300	7,000	2,200	810	690	18	92	110	130
Ethylbenzene	µg/L	700	160	6.9	53	19	4.2	12	3.3	6.9	160	910	510	390	310	23	110	280	280
Xylenes (Total)	µg/L	1,000	690	< 4 U	24.5	8.4	3.8	5.5	< 3.0 U	0.88 J	920	4,800	2,330	1,200	1,000	50	350	530	550
<b>Metals<sup>3</sup></b>																			
Lead (dissolved)	µg/L	15	--	< 1.0 U	--	--	--	--	--	--	--	< 1.0 U	--	--	--	--	--	--	--
<b>PAHs<sup>4</sup></b>																			
Naphthalene	µg/L	160	--	< 2.0 U	4.8	--	--	--	--	--	--	90	88	--	--	--	--	--	--
<b>VOCs<sup>5</sup></b>																			
1,2,4-Trimethylbenzene	µg/L	80	--	< 2.0 U	14	--	--	--	--	--	--	780	370	--	--	--	--	--	--
1,2-Dibromoethane (EDB)	µg/L	0.01	--	< 0.010 U	--	--	--	--	--	--	--	< 0.010 U	--	--	--	--	--	--	--
1,2-Dichloroethane (EDC)	µg/L	5	--	< 2.0 U	< 1.0 U	--	--	--	--	--	--	< 2.0 U	< 1.0 U	--	--	--	--	--	--
1,3,5-Trimethylbenzene	µg/L	80	--	< 2.0 U	2	--	--	--	--	--	--	210	90	--	--	--	--	--	--
2-Chlorotoluene	µg/L	160	--	< 2.0 U	< 1.0 U	--	--	--	--	--	--	< 2.0 U	< 1.0 U	--	--	--	--	--	--
4-Chlorotoluene	µg/L	160	--	< 2.0 U	< 1.0 U	--	--	--	--	--	--	< 2.0 U	< 1.0 U	--	--	--	--	--	--
4-Methyl-2-pentanone	µg/L	640	--	< 10 U	NA	--	--	--	--	--	--	< 10 U	NA	--	--	--	--	--	--
Acetone	µg/L	7,200	--	< 25 U	NA	--	--	--	--	--	--	< 25 U	NA	--	--	--	--	--	--
cis-1,2-Dichloroethene (cDCE)	µg/L	16	--	< 2.0 U	< 1.0 U	--	--	< 1.0 U	< 1.0 U	< 1.0 U	--	< 2.0 U	< 1.0 U	--	--	< 1.0 U	< 1.0 U	< 1.0 U	
Hexachlorobutadiene	µg/L	8	--	< 2.0 U	< 2.0 U	--	--	--	--	--	--	< 2.0 U	< 2.0 U	--	--	--	--	--	--
Isopropylbenzene (cumene)	µg/L	800	--	< 2.0 U	3	--	--	--	--	--	--	36	18	--	--	--	--	--	--
m,p-Xylenes	µg/L	1,600	--	< 4.0 U	15	--	--	3.7	< 2.0 U	0.88 J	--	3300	1500	--	--	220	310	320	
Methyl tert-butyl ether (MTBE)	µg/L	20	--	< 2.0 U	< 1.0 U	--	--	--	--	--	--	< 2.0 U	< 1.0 U	--	--	--	--	--	
n-Butylbenzene	µg/L	400	--	< 2.0 U	0.64 J	--	--	--	--	--	--	< 2.0 U	12	--	--	--	--	--	
n-Propylbenzene	µg/L	800	--	< 2.0 U	6.3	--	--	--	--	--	--	95	63	--	--	--	--	--	
o-Xylene	µg/L	1,600	--	< 2.0 U	9.5	--	--	1.7	< 1.0 U	< 1.0 U	--	1500	830	--	--	130	220	230	
p-Isopropyltoluene	µg/L	--	--	< 2.0 U	0.54 J	--	--	--	--	--	--	< 2.0 U	1.8	--	--	--	--	--	
sec-Butylbenzene	µg/L	800	--	< 2.0 U	0.73 J	--	--	--	--	--	--	3.9	3.3	--	--	--	--	--	
Styrene	µg/L	1,600	--	< 2.0 U	< 1.0 U	--	--	--	--	--	--	< 2.0 U	< 1.0 U	--	--	--	--	--	
tert-Butylbenzene	µg/L	800	--	< 2.0 U	< 1.0 U	--	--	--	--	--	--	< 2.0 U	< 1.0 U	--	--	--	--	--	
Tetrachloroethene (PCE)	µg/L	5	--	< 2.0 U	< 1.0 U	--	--	< 1.0 U	< 1.0 U	< 1.0 U	--	< 2.0 U	< 1.0 U	--	--	< 1.0 U	< 1.0 U	< 1.0 U	
trans-1,2-Dichloroethene	µg/L	160	--	< 2.0 U	< 1.0 U	--	--	< 1.0 U	< 1.0 U	< 1.0 U	--	< 2.0 U	< 1.0 U	--	--	< 1.0 U	< 1.0 U	< 1.0 U	
Trichloroethene (TCE)	µg/L	5	--	< 2.0 U	< 1.0 U	--	--	< 1.0 U	< 1.0 U	< 1.0 U	--	< 2.0 U	< 1.0 U	--	--	< 1.0 U	< 1.0 U	< 1.0 U	
Vinyl Chloride	µg/L	0.2	--	< 0.20 U	< 0.4 U	--	--	< 0.40 U	< 0.40 U	< 0.40 U	--	< 0.20 U	< 0.4 U	--	--	< 0.40 U	< 0.40 U	< 0.40 U	

Monitoring Well Location			City Right-of-way Wells															
			MW-2							MW-3								
Sample Date			11/29/2023	04/30/2024	8/20/2024	11/13/2024	03/26/2025	06/24/2025	09/16/2025	12/17/2025	11/29/2023	04/30/2024	8/20/2024	11/13/2024	03/26/2025	06/24/2025	09/16/2025	12/17/2025
Analyte	Unit	MTCA <sup>6</sup> CUL																
<b>Petroleum Hydrocarbons<sup>1</sup></b>																		
GRPH	µg/L	800	6,700	290	510	1,100	910	700	230	1,100	7,300	2,800	54	54 U	4,900	3,400	940	1,600
<b>BTEX<sup>2</sup></b>																		
Benzene	µg/L	5	910	190	130	270	260	310	100	130	700	120	0.52	2.7	57	69	11	13
Toluene	µg/L	1,000	1,300	< 2.0 U	0.49	29	3.1	< 1.4 U <sup>7</sup>	2.3	7.9 J	510	120	0.31	0.31 J	100	97	2.9	5.2
Ethylbenzene	µg/L	700	120	64	61	100	120	74	26	32	58	68	0.2	1.3	220	170	42	91
Xylenes (Total)	µg/L	1,000	630	< 4 U	1.52	120	30	36	1.6 J	220	1,200	450	0.44	3.5	1,100	590	120	170
<b>Metals<sup>3</sup></b>																		
Lead (dissolved)	µg/L	15	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
<b>PAHs<sup>4</sup></b>																		
Naphthalene	µg/L	160	--	7.6	2.4	--	--	--	--	--	--	30	0.63	--	--	--	--	--
<b>VOCs<sup>5</sup></b>																		
1,2,4-Trimethylbenzene	µg/L	80	--	30	7.4	--	--	--	--	--	--	84	< 1.0 U	--	--	--	--	--
1,2-Dibromoethane (EDB)	µg/L	0.01	--	< 0.010 U	--	--	--	--	--	--	--	< 0.010 U	--	--	--	--	--	--
1,2-Dichloroethane (EDC)	µg/L	5	--	< 2.0 U	< 1.0 U	--	--	--	--	--	--	2.4	< 1.0 U	--	--	--	--	--
1,3,5-Trimethylbenzene	µg/L	80	--	< 2.0 U	< 1.0 U	--	--	--	--	--	--	36	< 1.0 U	--	--	--	--	--
2-Chlorotoluene	µg/L	160	--	< 2.0 U	< 1.0 U	--	--	--	--	--	--	2.7	< 1.0 U	--	--	--	--	--
4-Chlorotoluene	µg/L	160	--	< 2.0 U	< 1.0 U	--	--	--	--	--	--	7.5	< 1.0 U	--	--	--	--	--
4-Methyl-2-pentanone	µg/L	640	--	< 10 U	NA	--	--	--	--	--	--	< 10 U	NA	--	--	--	--	--
Acetone	µg/L	7,200	--	< 25 U	NA	--	--	--	--	--	--	30	NA	--	--	--	--	--
cis-1,2-Dichloroethene (cDCE)	µg/L	16	--	< 2.0 U	< 1.0 U	--	--	< 1.0 U	< 1.0 U	< 1.0 U	--	< 2.0 U	< 1.0 U	--	--	< 1.0 U	< 1.0 U	< 1.0 U
Hexachlorobutadiene	µg/L	8	--	< 2.0 U	< 2.0 U	--	--	--	--	--	--	< 2.0 U	< 2.0 U	--	--	--	--	--
Isopropylbenzene (cumene)	µg/L	800	--	3.5	2.2	--	--	--	--	--	--	3.0	< 1.0 U	--	--	--	--	--
m,p-Xylenes	µg/L	1,600	--	< 4.0 U	< 2.0 U	--	--	36	1.6 J	68	--	190	< 2.0 U	--	--	270	29	97
Methyl tert-butyl ether (MTBE)	µg/L	20	--	< 2.0 U	< 1.0 U	--	--	--	--	--	--	< 2.0 U	< 1.0 U	--	--	--	--	--
n-Butylbenzene	µg/L	400	--	< 2.0 U	< 1.0 U	--	--	--	--	--	--	4.9	< 1.0 U	--	--	--	--	--
n-Propylbenzene	µg/L	800	--	7.0	5.8	--	--	--	--	--	--	4.1	< 1.0 U	--	--	--	--	--
o-Xylene	µg/L	1,600	--	< 2.0 U	< 1.0 U	--	--	< 1.0 U	< 1.0 U	150	--	260	< 1.0 U	--	--	320	88	57
p-Isopropyltoluene	µg/L	--	--	< 2.0 U	0.53 J	--	--	--	--	--	--	< 2.0 U	< 1.0 U	--	--	--	--	--
sec-Butylbenzene	µg/L	800	--	< 2.0 U	0.55 J	--	--	--	--	--	--	< 2.0 U	< 1.0 U	--	--	--	--	--
Styrene	µg/L	1,600	--	< 2.0 U	< 1.0 U	--	--	--	--	--	--	8.5	< 1.0 U	--	--	--	--	--
tert-Butylbenzene	µg/L	800	--	< 2.0 U	< 1.0 U	--	--	--	--	--	--	12	< 1.0 U	--	--	--	--	--
Tetrachloroethene (PCE)	µg/L	5	--	< 2.0 U	< 1.0 U	--	--	< 1.0 U	< 1.0 U	< 1.0 U	--	< 2.0 U	< 1.0 U	--	--	< 1.0 U	< 1.0 U	< 1.0 U
trans-1,2-Dichloroethene	µg/L	160	--	< 2.0 U	< 1.0 U	--	--	< 1.0 U	< 1.0 U	< 1.0 U	--	< 2.0 U	< 1.0 U	--	--	< 1.0 U	< 1.0 U	< 1.0 U
Trichloroethene (TCE)	µg/L	5	--	< 2.0 U	< 1.0 U	--	--	< 1.0 U	< 1.0 U	< 1.0 U	--	< 2.0 U	< 1.0 U	--	--	< 1.0 U	< 1.0 U	< 1.0 U
Vinyl Chloride	µg/L	0.2	--	< 0.20 U	< 0.4 U	--	--	< 0.40 U	< 0.40 U	< 0.40 U	--	< 0.20 U	< 0.4 U	--	--	< 0.40 U	< 0.40 U	< 0.40 U

Monitoring Well Location			City Right-of-way Wells														
			MW-4							MW-5							
Sample Date			11/28/2023	04/30/2024	8/20/2024	11/13/2024	03/26/2025	06/24/2025	09/16/2025	12/17/2025	11/29/2023	05/01/2024	11/13/2024	03/26/2025	06/25/2025	09/15/2025	12/17/2025
Analyte	Unit	MTCA <sup>6</sup> CUL															
<b>Petroleum Hydrocarbons<sup>1</sup></b>																	
GRPH	µg/L	800	< 50 U	< 50 U	54	54	< 150 U	< 150 U	< 150 U	< 150 U	190,000	130,000	42,000	39,000	36,000	10,000	23,000
<b>BTEX<sup>2</sup></b>																	
Benzene	µg/L	5	< 1.0 U	< 2.0 U	0.38	< 0.4 U	< 0.40 U	0.48	< 0.40 U	< 0.40 U	9,100	700	800	1,500	670	200	1,100
Toluene	µg/L	1,000	< 1.0 U	< 2.0 U	0.31	< 1.0 U	< 0.53 U <sup>7</sup>	< 0.46 B, U <sup>7</sup>	< 1.0 U	< 1.0 U	33,000	5,500	6,500	6,300	5,300	1,500	2,400
Ethylbenzene	µg/L	700	< 1.0 U	< 2.0 U	0.23	< 1.0 U	0.44 J	< 1.0 U	< 1.0 U	< 1.0 U	2,000	2,400	880	1,100	980	390	800
Xylenes (Total)	µg/L	1,000	< 3.0 U	< 4 U	0.44	< 3.0 U	1.4 J	1.2 J	< 3.0 U	< 3.0 U	16,000	3,000	8,200	8,200	6,900	2,300	6,100
<b>Metals<sup>3</sup></b>																	
Lead (dissolved)	µg/L	15	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
<b>PAHs<sup>4</sup></b>																	
Naphthalene	µg/L	160	-	< 2.0 U	< 2.0 U	-	-	-	-	-	-	420	-	-	-	-	-
<b>VOCs<sup>5</sup></b>																	
1,2,4-Trimethylbenzene	µg/L	80	-	< 2.0 U	< 1.0 U	-	-	-	-	-	-	2,400	-	-	-	-	-
1,2-Dibromoethane (EDB)	µg/L	0.01	-	< 0.010 U	-	-	-	-	-	-	-	< 0.010 U	-	-	-	-	-
1,2-Dichloroethane (EDC)	µg/L	5	-	< 2.0 U	< 1.0 U	-	-	-	-	-	-	< 2.0 U	-	-	-	-	-
1,3,5-Trimethylbenzene	µg/L	80	-	< 2.0 U	< 1.0 U	-	-	-	-	-	-	650	-	-	-	-	-
2-Chlorotoluene	µg/L	160	-	< 2.0 U	< 1.0 U	-	-	-	-	-	-	< 2.0 U	-	-	-	-	-
4-Chlorotoluene	µg/L	160	-	< 2.0 U	< 1.0 U	-	-	-	-	-	-	< 2.0 U	-	-	-	-	-
4-Methyl-2-pentanone	µg/L	640	-	< 10 U	NA	-	-	-	-	-	-	< 10 U	-	-	-	-	-
Acetone	µg/L	7,200	-	< 25 U	NA	-	-	-	-	-	-	< 25 U	-	-	-	-	-
cis-1,2-Dichloroethene (cDCE)	µg/L	16	-	< 2.0 U	< 1.0 U	-	-	< 1.0 U	< 1.0 U	< 1.0 U	-	< 2.0 U	-	-	< 1.0 U	< 1.0 U	< 1.0 U
Hexachlorobutadiene	µg/L	8	-	< 2.0 U	< 2.0 U	-	-	-	-	-	-	< 2.0 U	-	-	-	-	-
Isopropylbenzene (cumene)	µg/L	800	-	< 2.0 U	< 1.0 U	-	-	-	-	-	-	77	-	-	-	-	-
m,p-Xylenes	µg/L	1,600	-	< 4.0 U	< 2.0 U	-	-	1.2 J	< 2.0 U	< 2.0 U	-	2,100	-	-	4,600	1,500	4,300
Methyl tert-butyl ether (MTBE)	µg/L	20	-	< 2.0 U	< 1.0 U	-	-	-	-	-	-	< 2.0 U	-	-	-	-	-
n-Butylbenzene	µg/L	400	-	< 2.0 U	< 1.0 U	-	-	-	-	-	-	< 2.0 U	-	-	-	-	-
n-Propylbenzene	µg/L	800	-	< 2.0 U	< 1.0 U	-	-	-	-	-	-	240	-	-	-	-	-
o-Xylene	µg/L	1,600	-	< 2.0 U	< 1.0 U	-	-	< 1.0 U	< 1.0 U	< 1.0 U	-	900	-	-	2,200	750	1,800
p-Isopropyltoluene	µg/L	-	-	< 2.0 U	< 1.0 U	-	-	-	-	-	-	6.4	-	-	-	-	-
sec-Butylbenzene	µg/L	800	-	< 2.0 U	< 1.0 U	-	-	-	-	-	-	9.1	-	-	-	-	-
Styrene	µg/L	1,600	-	< 2.0 U	< 1.0 U	-	-	-	-	-	-	< 2.0 U	-	-	-	-	-
tert-Butylbenzene	µg/L	800	-	< 2.0 U	< 1.0 U	-	-	-	-	-	-	< 2.0 U	-	-	-	-	-
Tetrachloroethene (PCE)	µg/L	5	-	< 2.0 U	< 1.0 U	-	-	< 1.0 U	< 1.0 U	< 1.0 U	-	< 2.0 U	-	-	< 1.0 U	< 1.0 U	< 1.0 U
trans-1,2-Dichloroethene	µg/L	160	-	< 2.0 U	< 1.0 U	-	-	< 1.0 U	< 1.0 U	< 1.0 U	-	< 2.0 U	-	-	< 1.0 U	< 1.0 U	< 1.0 U
Trichloroethene (TCE)	µg/L	5	-	< 2.0 U	< 1.0 U	-	-	< 1.0 U	< 1.0 U	< 1.0 U	-	< 2.0 U	-	-	< 1.0 U	< 1.0 U	< 1.0 U
Vinyl Chloride	µg/L	0.2	-	< 0.20 U	< 0.4 U	-	-	< 0.40 U	< 0.40 U	< 0.40 U	-	< 0.20 U	-	-	< 0.40 U	< 0.40 U	< 0.40 U

Monitoring Well Location			City Right-of-way Wells													
			MW-6						MW-7							
Sample Date			05/01/2024	11/14/2024	03/26/2025	06/24/2025	09/16/2025	12/17/2025	11/10/2023	04/30/2024	8/20/2024	11/13/2024	03/26/2025	06/25/2025	09/15/2025	12/18/2025
Analyte	Unit	MTCA <sup>6</sup> CUL														
<b>Petroleum Hydrocarbons<sup>1</sup></b>																
GRPH	µg/L	800	77,000	25,000	12,000	2,600	9,300	21,000	76	< 50 U	55	170	99 J	150	97 J	140 J
<b>BTEX<sup>2</sup></b>																
Benzene	µg/L	5	2,000	650	4.3	36	240	130	< 1.0 U	< 2.0 U	< 0.4 U	< 0.4 U	< 0.40 U	2.2	< 0.40 U	< 0.40 U
Toluene	µg/L	1,000	9,000	69,000	78	96	750	1,300	< 1.0 U	< 2.0 U	0.31	< 1.0 U	1.4	< 2.8 U <sup>7</sup>	< 1.0 U	< 1.0 U
Ethylbenzene	µg/L	700	1,900	1,100	150	63	230	620	< 1.0 U	< 2.0 U	0.2	< 1.0 U	0.79 J	1.4	< 1.0 U	< 1.0 U
Xylenes (Total)	µg/L	1,000	12,000	7,700	1,700	470	1,400	4,800	< 3.0 U	< 4 U	0.44	< 3.0 U	3.5	7.4	< 3.0 U	< 3.0 U
<b>Metals<sup>3</sup></b>																
Lead (dissolved)	µg/L	15	--	--	--	--	--	--	--	--	--	--	--	--	--	--
<b>PAHs<sup>4</sup></b>																
Naphthalene	µg/L	160	420	--	--	--	--	--	--	< 2.0 U	< 2.0 U	--	--	--	--	--
<b>VOCs<sup>5</sup></b>																
1,2,4-Trimethylbenzene	µg/L	80	2,100	--	--	--	--	--	--	< 2.0 U	< 1.0 U	--	--	--	--	--
1,2-Dibromoethane (EDB)	µg/L	0.01	< 0.010 U	--	--	--	--	--	--	< 0.010 U	--	--	--	--	--	--
1,2-Dichloroethane (EDC)	µg/L	5	< 2.0 U	--	--	--	--	--	--	< 2.0 U	< 1.0 U	--	--	--	--	--
1,3,5-Trimethylbenzene	µg/L	80	640	--	--	--	--	--	--	< 2.0 U	< 1.0 U	--	--	--	--	--
2-Chlorotoluene	µg/L	160	< 2.0 U	--	--	--	--	--	--	< 2.0 U	< 1.0 U	--	--	--	--	--
4-Chlorotoluene	µg/L	160	< 2.0 U	--	--	--	--	--	--	< 2.0 U	< 1.0 U	--	--	--	--	--
4-Methyl-2-pentanone	µg/L	640	< 10 U	--	--	--	--	--	--	< 10 U	NA	--	--	--	--	--
Acetone	µg/L	7,200	< 25 U	--	--	--	--	--	--	< 25 U	NA	--	--	--	--	--
cis-1,2-Dichloroethene (cDCE)	µg/L	16	< 2.0 U	--	--	< 1.0 U	< 1.0 U	< 1.0 U	--	4.9	3	--	--	3.7	4.3	5.7
Hexachlorobutadiene	µg/L	8	< 2.0 U	--	--	--	--	--	--	< 2.0 U	< 2.0 U	--	--	--	--	--
Isopropylbenzene (cumene)	µg/L	800	91	--	--	--	--	--	--	< 2.0 U	< 1.0 U	--	--	--	--	--
m,p-Xylenes	µg/L	1,600	8,800	--	--	350	930	3,300	--	< 4.0 U	< 2.0 U	--	--	5.4 J	< 2.0 U	< 2.0 U
Methyl tert-butyl ether (MTBE)	µg/L	20	< 2.0 U	--	--	--	--	--	--	< 2.0 U	< 1.0 U	--	--	--	--	--
n-Butylbenzene	µg/L	400	< 2.0 U	--	--	--	--	--	--	< 2.0 U	< 1.0 U	--	--	--	--	--
n-Propylbenzene	µg/L	800	310	--	--	--	--	--	--	< 2.0 U	< 1.0 U	--	--	--	--	--
o-Xylene	µg/L	1,600	3,200	--	--	130	430	1,500	--	< 2.0 U	< 1.0 U	--	--	2.1	< 1.0 U	< 1.0 U
p-Isopropyltoluene	µg/L	--	6.1	--	--	--	--	--	--	< 2.0 U	< 1.0 U	--	--	--	--	--
sec-Butylbenzene	µg/L	800	9.5	--	--	--	--	--	--	< 2.0 U	< 1.0 U	--	--	--	--	--
Styrene	µg/L	1,600	< 2.0 U	--	--	--	--	--	--	< 2.0 U	< 1.0 U	--	--	--	--	--
tert-Butylbenzene	µg/L	800	< 2.0 U	--	--	--	--	--	--	< 2.0 U	< 1.0 U	--	--	--	--	--
Tetrachloroethene (PCE)	µg/L	5	< 2.0 U	--	--	1.1	0.58 J	1.7	--	62	53	--	--	42	47	77
trans-1,2-Dichloroethene	µg/L	160	< 2.0 U	--	--	< 1.0 U	< 1.0 U	< 1.0 U	--	< 2.0 U	< 1.0 U	--	--	< 1.0 U	< 1.0 U	< 1.0 U
Trichloroethene (TCE)	µg/L	5	< 2.0 U	--	--	< 1.0 U	< 1.0 U	< 1.0 U	--	8.3	4.9	--	--	5.1	7.8	9.6
Vinyl Chloride	µg/L	0.2	< 0.20 U	--	--	< 0.40 U	< 0.40 U	< 0.40 U	--	< 0.20 U	< 0.4 U	--	--	< 0.40 U	< 0.40 U	< 0.40 U

Monitoring Well Location			City Right-of-way Wells															
			MW-8							MW-9								
Sample Date			11/10/2023	05/01/2024	8/20/2024	11/13/2024	03/26/2025	06/25/2025	09/15/2025	12/18/2025	11/10/2023	05/01/2024	08/20/2024	11/13/2024	03/26/2025	06/25/2025	09/15/2025	12/17/2025
Analyte	Unit	MTCA <sup>6</sup> CUL																
<b>Petroleum Hydrocarbons<sup>1</sup></b>																		
GRPH	µg/L	800	320	310	760	1,900	760 J	1,100	1,200	1,200	240	< 50 U	54	59 J	< 54 U	< 90 U <sup>7</sup>	< 150 U	< 150 U
<b>BTEX<sup>2</sup></b>																		
Benzene	µg/L	5	3.4	< 2.0 U	< 0.4 U	< 0.4 U	< 0.40 U	< 0.40 U	< 0.40 U	< 0.40 U	41	< 2.0 U	< 0.4 U	< 0.4 U	< 0.40 U	< 0.40 U	< 0.40 U	< 0.40 U
Toluene	µg/L	1,000	< 1.0 U	< 2.0 U	< 1.0 U	< 1.0 U	< 0.77 U <sup>7</sup>	< 1.0 U	< 1.0 U	0.56 J	< 1.0 U	< 2.0 U	< 1.0 U	< 1.0 U	< 0.57 U <sup>7</sup>	< 1.0 U	< 1.0 U	0.36 J
Ethylbenzene	µg/L	700	< 1.0 U	< 2.0 U	< 1.0 U	< 1.0 U	0.26 J	< 1.0 U	< 1.0 U	0.40 J	< 1.0 U	< 2.0 U	< 1.0 U	< 1.0 U	< 1.0 U	< 1.0 U	< 1.0 U	0.26 J
Xylenes (Total)	µg/L	1,000	< 3.0 U	< 4 U	< 2.0 U	< 3.0 U	1.2 J	< 3.0 U	< 3.0 U	1.4 J	< 3.0 U	< 4 U	< 2.0 U	< 3.0 U	0.75 J	< 3.0 U	< 3.0 U	1.0 J
<b>Metals<sup>3</sup></b>																		
Lead (dissolved)	µg/L	15	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
<b>PAHs<sup>4</sup></b>																		
Naphthalene	µg/L	160	--	< 2.0 U	< 2.0 U	--	--	--	--	--	--	< 2.0 U	< 2.0 U	--	--	--	--	--
<b>VOCs<sup>5</sup></b>																		
1,2,4-Trimethylbenzene	µg/L	80	--	< 2.0 U	< 1.0 U	--	--	--	--	--	--	< 2.0 U	< 1.0 U	--	--	--	--	--
1,2-Dibromoethane (EDB)	µg/L	0.01	--	< 0.010 U	--	--	--	--	--	--	--	< 0.010 U	--	--	--	--	--	--
1,2-Dichloroethane (EDC)	µg/L	5	--	< 2.0 U	< 1.0 U	--	--	--	--	--	--	< 2.0 U	< 1.0 U	--	--	--	--	--
1,3,5-Trimethylbenzene	µg/L	80	--	< 2.0 U	< 1.0 U	--	--	--	--	--	--	< 2.0 U	< 1.0 U	--	--	--	--	--
2-Chlorotoluene	µg/L	160	--	< 2.0 U	< 1.0 U	--	--	--	--	--	--	< 2.0 U	< 1.0 U	--	--	--	--	--
4-Chlorotoluene	µg/L	160	--	< 2.0 U	< 1.0 U	--	--	--	--	--	--	< 2.0 U	< 1.0 U	--	--	--	--	--
4-Methyl-2-pentanone	µg/L	640	--	< 10 U	NA	--	--	--	--	--	--	< 10 U	NA	--	--	--	--	--
Acetone	µg/L	7,200	--	< 25 U	NA	--	--	--	--	--	--	< 25 U	NA	--	--	--	--	--
cis-1,2-Dichloroethene (cDCE)	µg/L	16	--	82	85	--	--	89	82	90	--	< 2.0 U	< 1.0 U	--	--	1.3	0.91 J	< 1.0 U
Hexachlorobutadiene	µg/L	8	--	< 2.0 U	< 2.0 U	--	--	--	--	--	--	< 2.0 U	< 2.0 U	--	--	--	--	--
Isopropylbenzene (cumene)	µg/L	800	--	< 2.0 U	< 1.0 U	--	--	--	--	--	--	< 2.0 U	< 1.0 U	--	--	--	--	--
m,p-Xylenes	µg/L	1,600	--	< 4.0 U	< 2.0 U	--	--	< 2.0 U	< 2.0 U	1.4 J	--	< 4.0 U	< 2.0 U	--	--	< 2.0 U	< 2.0 U	1.0 J
Methyl tert-butyl ether (MTBE)	µg/L	20	--	< 2.0 U	< 1.0 U	--	--	--	--	--	--	< 2.0 U	< 1.0 U	--	--	--	--	--
n-Butylbenzene	µg/L	400	--	< 2.0 U	< 1.0 U	--	--	--	--	--	--	< 2.0 U	< 1.0 U	--	--	--	--	--
n-Propylbenzene	µg/L	800	--	< 2.0 U	< 1.0 U	--	--	--	--	--	--	< 2.0 U	< 1.0 U	--	--	--	--	--
o-Xylene	µg/L	1,600	--	< 2.0 U	< 1.0 U	--	--	< 1.0 U	< 1.0 U	< 1.0 U	--	< 2.0 U	< 1.0 U	--	--	< 1.0 U	< 1.0 U	< 1.0 U
p-Isopropyltoluene	µg/L	--	--	< 2.0 U	< 1.0 U	--	--	--	--	--	--	< 2.0 U	< 1.0 U	--	--	--	--	--
sec-Butylbenzene	µg/L	800	--	< 2.0 U	< 1.0 U	--	--	--	--	--	--	< 2.0 U	< 1.0 U	--	--	--	--	--
Styrene	µg/L	1,600	--	< 2.0 U	< 1.0 U	--	--	--	--	--	--	< 2.0 U	< 1.0 U	--	--	--	--	--
tert-Butylbenzene	µg/L	800	--	< 2.0 U	< 1.0 U	--	--	--	--	--	--	< 2.0 U	< 1.0 U	--	--	--	--	--
Tetrachloroethene (PCE)	µg/L	5	--	840	920	--	--	970	730	920	--	6.1	4.9	--	--	15	12	17
trans-1,2-Dichloroethene	µg/L	160	--	4.1	< 20 U	--	--	3.5	2.7	3.1	--	< 2.0 U	< 1.0 U	--	--	< 1.0 U	< 1.0 U	< 1.0 U
Trichloroethene (TCE)	µg/L	5	--	66	79	--	--	86	76	77	--	< 2.0 U	0.5 J	--	--	2.2	1.4	1.1
Vinyl Chloride	µg/L	0.2	--	0.96	< 0.4 U	--	--	< 0.40 U	< 0.40 U	1.1	--	< 0.20 U	< 0.4 U	--	--	< 0.40 U	< 0.40 U	< 0.40 U

**Notes:**

<sup>1</sup>Gasoline-range petroleum hydrocarbons (GRPH) analyzed using Northwest Method NWTPH-Gx.

<sup>2</sup>Volatile organic compounds analyzed using United States Environmental Protection Agency (EPA) Method 8260D.

<sup>3</sup>Metals analyzed using EPA Method 6010D.

<sup>4</sup>Polycyclic aromatic hydrocarbons analyzed using the EPA Method 8270 E

<sup>6</sup>Model Toxics Control Act (MTCA) Method A/B Cleanup Levels (CUL) for Groundwater

<sup>7</sup>Analyte was not deemed above the reported sample quantitation limit due to blank contamination.

J = Analyte was detected at a concentration between the laboratory method detection limit (MDL) and reporting limit (RL) and the concentration is an estimated value

U = Analyte was not detected.

UJ = Analyte was not deemed above the reported sample quantitation limit due to trip blank contamination.

"-" = not analyzed.

µg/L - micrograms per liter

**Bold** indicates analyte was detected.

**Bold** with gray shading indicates analyte was detected at concentration greater than the MTCA Method A cleanup level.

*Italics* notes Ecology and Aspect data as reported to GeoEngineers on April 15, 2025

September 2025 data 100% QC'd on 10/30/25 - JDO

**Table 3**  
**Chemical Analytical Results - Sump Water**  
 Stillwater Holdings Chevron Site  
 Walla Walla, Washington

Sample Location				Building 106										Marcus Whitman Hotel								
Sample Date				11/8/2023	3/28/2024	8/16/2024	11/14/2024	3/27/2025	5/4/2025	5/13/2025	6/26/2025	8/8/2025	9/17/2025	12/6/2025	11/8/2023	3/28/2024	8/16/2024	11/14/2024	3/27/2025	6/26/2025	9/17/2025	12/18/2025
Sample Identification				106HS-110823 <sup>6</sup>	106 Sump <sup>6</sup>	106 Sump <sup>6</sup>	106 Sump <sup>6</sup>	BLG 106 Sump	Treatment System Influent <sup>6</sup>	Treatment System Influent <sup>6</sup>	BLG 106 Sump	106 Sump <sup>6</sup>	Building 106 Sump	106 Sump <sup>6</sup>	MWH Sump-110823 <sup>6</sup>	MWH Sump <sup>6</sup>	MHW Sump <sup>6</sup>	MHW Sump <sup>6</sup>	Marcus Whitman Sump	Marcus Whitman Sump	Marcus Whitman Sump	Marcus Whitman Sump
Analyte	Unit	Walla Walla POTW Discharge Limits	MTCA Method A CUL <sup>4</sup>																			
<b>Petroleum Hydrocarbons<sup>1</sup></b>																						
GRPH	µg/L	1,000	800	6,900	9,900	2,000	2,700	750	-	-	< 65 U <sup>5</sup>	-	< 150 U	<100 U	54,000	17,000	< 54 U	< 54 U	3,600	1,000	< 150 U	1,500
<b>Volatile Organic Compounds (VOCs)<sup>2</sup></b>																						
Benzene	µg/L	10	5	420	270	71	67	36	<2.0 U	<0.20 U	< 0.40 U	<0.20 U	<0.40 U	<0.200 U	1,700	640	0.18 J	< 0.093 U	290	5.1	<0.40 U	93
Toluene	µg/L	NE	1,000	980	1,400	240	310	110	<2.0 U	<1.0 U	< 1.0 U	<1.0 U	<1.0 U	<1.0 U	4,300	1,900	0.64 J	< 0.45 U	66	1.1	< 1.0 U	11
Ethylbenzene	µg/L	NE	700	46	160	45	49	15	<2.0 U	<0.500 U	< 1.0 U	<0.500 U	< 1.0 U	<0.5 U	110	28	< 0.2 U	< 0.2 U	15	0.49 J	< 1.0 U	12
Xylenes (Total)	µg/L	NE	1,000	780	1,320	420	490	160	<2.0 U	<1.50 U	< 3.0 U	<1.50 U	< 3.0 U	<1.5 U	6,900	2,540	1.07 J	< 0.44 U	860	20	< 3.0 U	180
<b>BTEX Total<sup>3</sup></b>	µg/L	200	NE	2,226	3,150	776	916	321	<8.00 U	<3.2 U	< 5.4 U	<3.2 U	< 5.4 U	<3.2 U	13,010	5,108	1.89	<1.813 U	1,231	26.69 J	< 5.4 U	296

**Notes:**

<sup>1</sup>Gasoline-range petroleum hydrocarbons (GRPH) analyzed using Northwest Method NWTPH-Gx.

<sup>2</sup>Volatile organic compounds (VOCs) analyzed using United States Environmental Protection Agency (EPA) Method 8260D.

<sup>3</sup>BTEX = Benzene, Toluene, Ethylbenzene and Xylenes (total).

<sup>4</sup>Model Toxics Control Act (MTCA) Method A Cleanup Levels (CUL) for Groundwater.

<sup>5</sup>Analyte was not deemed above the reported sample quantitation limit due to blank contamination.

<sup>6</sup>Sample Collected by others.

J = Analyte was detected at a concentration between the laboratory method detection limit (MDL) and reporting limit (RL) and the concentration is an estimated value OR the number is an estimated value.

NE = Not established.

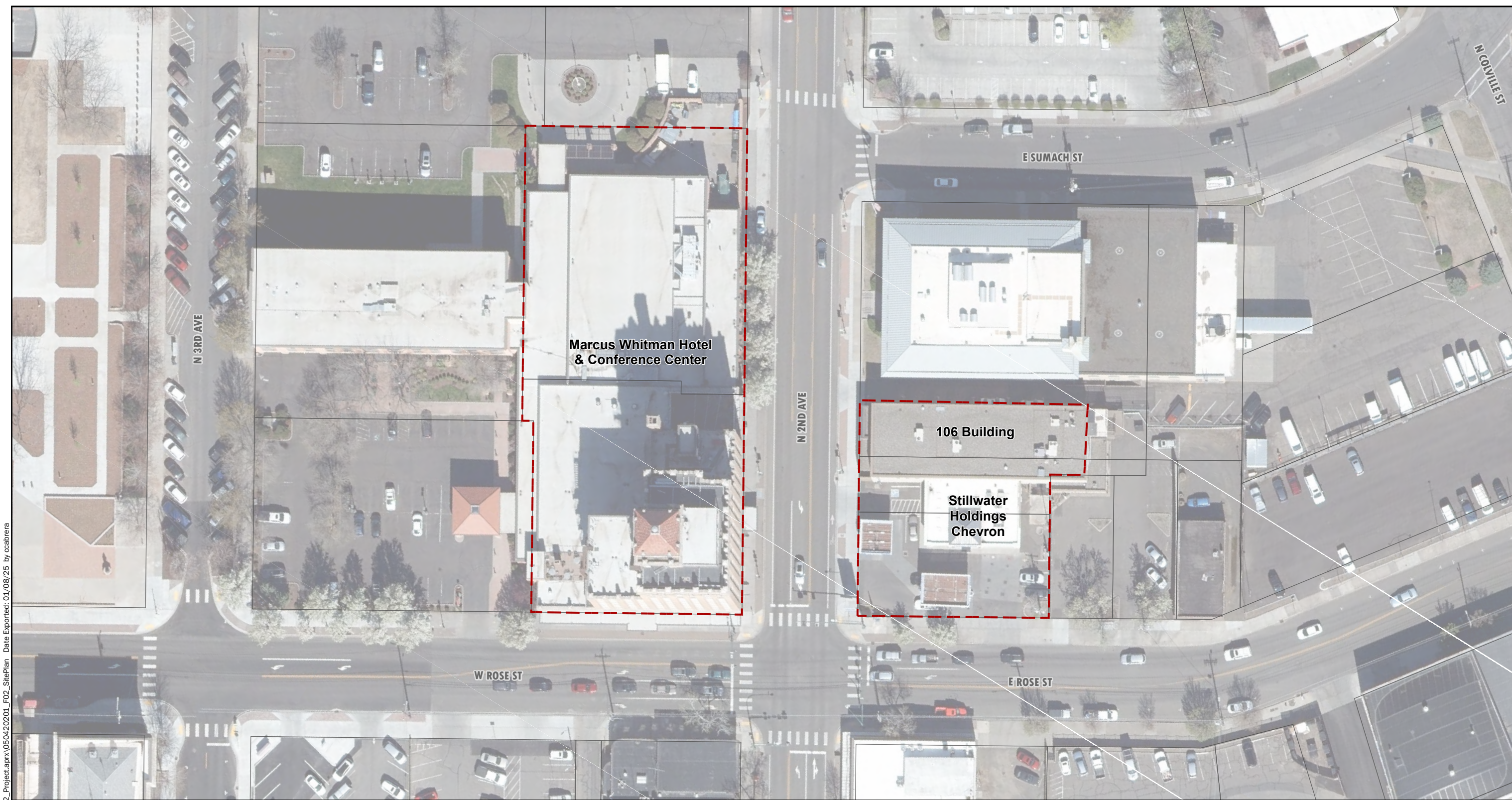
U = Analyte not detected at or above Reporting Limit (RL) shown.

**Bold** indicates analyte was detected.

**Bold** with gray shading indicates analyte was detected at concentration greater than the MTCA Method A cleanup level.

## Figures





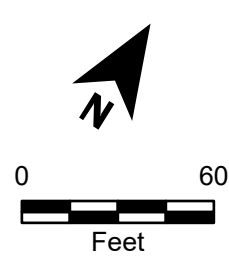


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Source(s):  
 • Walla Walla GIS  
 Coordinate System: NAD 1983 StatePlane Washington South FIPS 4602 Feet

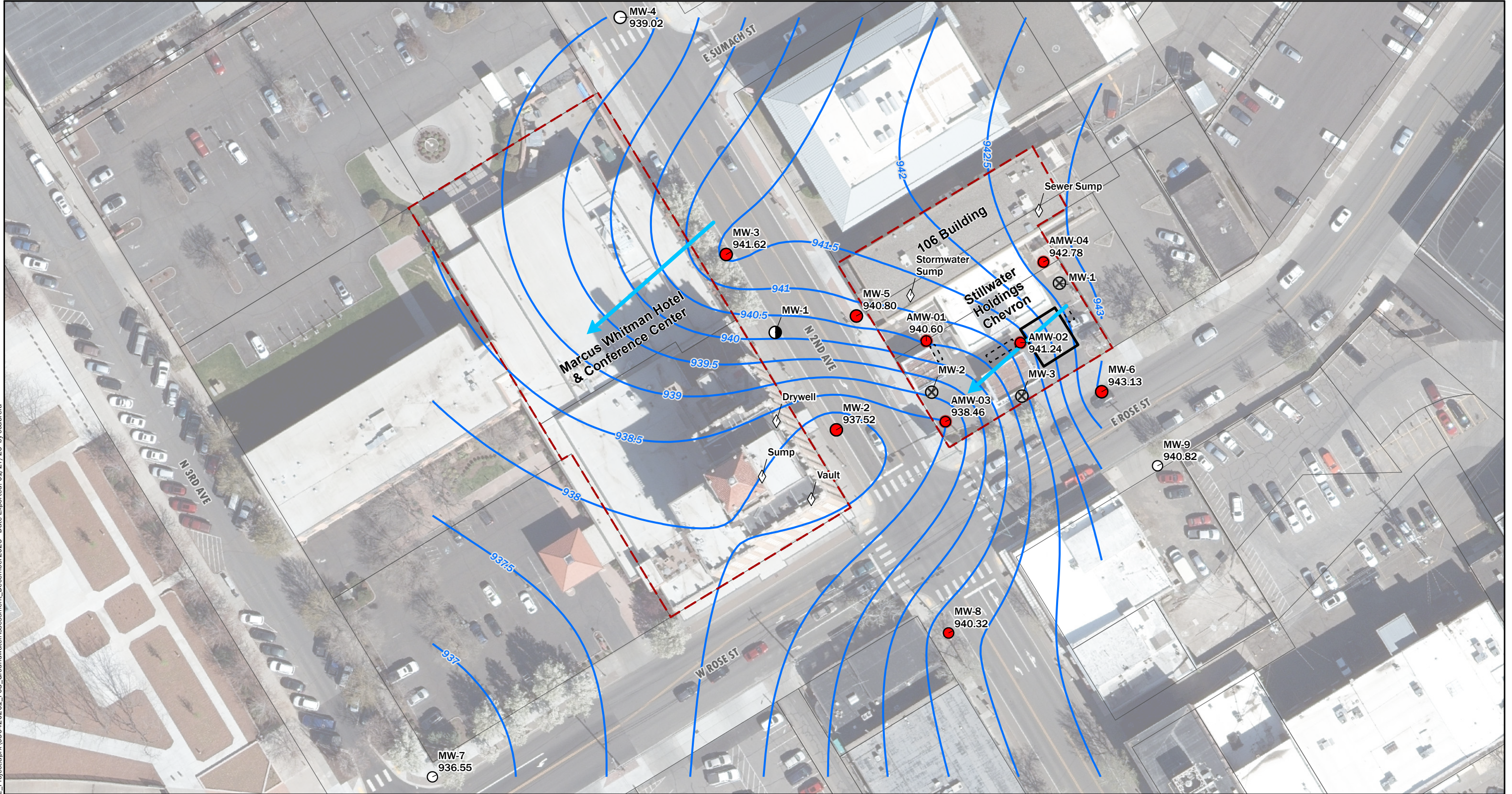
**Disclaimer:** This figure was created for a specific purpose and project. Any use of this figure for any other project or purpose shall be at the user's sole risk and without liability to GeoEngineers. The locations of features shown may be approximate. GeoEngineers makes no warranty or representation as to the accuracy, completeness, or suitability of the figure, or data contained therein. The file containing this figure is a copy of a master document, the original of which is retained by GeoEngineers and is the official document of record.

 Site Buildings  
 Walla Walla Tax Parcel



<b>Site Plan</b>	
Stillwater Holdings Chevron Walla Walla, Washington	
	<b>Figure 2</b>

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**Notes:**

1. Basement samples in Marcus Whitman Hotel not shown on this figure.
2. Groundwater elevation data from Aspect Consulting Stillwater Holdings Chevron Groundwater Data Table - June 12 2024

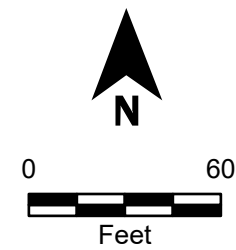
Source(s):

- Walla Walla GIS

Coordinate System: NAD 1983 StatePlane Washington South FIPS 4602 Feet

**Disclaimer:** This figure was created for a specific purpose and project. Any use of this figure for any other project or purpose shall be at the user's sole risk and without liability to GeoEngineers. The locations of features shown may be approximate. GeoEngineers makes no warranty or representation as to the accuracy, completeness, or suitability of the figure, or data contained therein. The file containing this figure is a copy of a master document, the original of which is retained by GeoEngineers and is the official document of record.

- Monitoring Well and Groundwater Elevation (feet)
- Decommissioned Monitoring Well
- Sump
- Monitoring Well Not Sampleable
- Existing UST and Limits of Excavation
- Decommissioned UST
- GRPH, Benzene, Toluene, Ethylbenzene, and/or Xylenes (Total) Detected at concentrations greater than their respective MTCA Method A Cleanup Levels
- Interpolated Groundwater Contour
- Site Buildings
- Groundwater Flow Direction
- Walla Walla Tax Parcel



**Groundwater Assessment - December 2025**

Stillwater Holdings Chevron  
Walla Walla, Washington



Figure 3

## Appendices

Appendix A  
Field Assessment Procedures

## Appendix A

### Field Assessment Procedures

#### STANDARD PROCEDURES

This section contains standard procedures for field data collection that were conducted during groundwater sampling activities at the Stillwater Holdings Chevron cleanup site located at 7 East Rose Street in Walla Walla, Washington.

#### *Monitoring Well Sampling*

Groundwater samples were collected from groundwater monitoring wells AMW-01 through AMW-04, MW-2 through MW-9, and analyzed as described below. Depth to groundwater relative to the top of the polyvinyl chloride (PVC) well casing was measured to the nearest 0.01 foot using an electronic interface probe and recorded in the field notes.

Following depth to groundwater measurement, a groundwater sample was collected from each monitoring well consistent with the EPA's low-flow groundwater sampling procedure, as described in EPA (2017) and Puls and Barcelona (1996). Dedicated tubing and a peristaltic pump was used for groundwater purging and sampling. During purging activities, water quality parameters, including pH, conductivity, dissolved oxygen (DO), oxidation-reduction potential (ORP), turbidity, and temperature, were measured using a multi-parameter meter equipped with a flow-through cell. Depth to water also was measured and recorded when groundwater quality parameters were recorded. Each monitoring well was purged until parameters stabilized or a maximum of 30 minutes, whichever occurred first, before collecting the sample. Stability was defined as the following:

- pH:  $\pm 0.1$  pH units;
- Conductivity:  $\pm 3$  percent micro-Siemens per centimeter ( $\mu\text{S}/\text{cm}$ );
- ORP:  $\pm 10$  millivolts (mV);
- DO:  $\pm 0.3$  milligrams per Liter (mg/L);
- Turbidity: less than 10 nephelometric turbidity unit (NTUs) or  $\pm 10$  percent NTUs when turbidity is greater than 10 NTUs; and
- Temperature:  $\pm 3$  percent degrees Celsius.

Field water quality measurements and depth-to-water measurements were recorded on a well purging-field water quality measurement form. Groundwater samples were transferred in the field to laboratory-prepared sample containers and kept cool during transport to the testing laboratory. Chain-of-custody procedures were observed from the time of sample collection to delivery to the testing laboratory consistent with the Quality Assurance Project Plan (QAPP) included in the Work Plan (GeoEngineers 2024).

#### *Sump Sampling*

Water samples were collected from the sump located in the Marcus Whitman sub-basement using a dedicated tubing and a peristaltic pump. Low flow (<200 milliliters per minute) were used to reduce degassing of volatile organic compounds (VOC) samples. Water samples were transferred in the field to laboratory-prepared sample containers and kept cool during transport to the testing laboratory.

Chain-of-custody procedures were observed from the time of sample collection to delivery to the testing laboratory consistent with the QAPP.

## REFERENCES

- Puls, R. W. and M.J. Barcelona. 1996. "Low-flow (Minimal Drawdown) Ground-water Sampling Procedures." EPA Ground Water Issue. April. p.1-9.
- U.S. Environmental Protection Agency (EPA). 2017. Region 1, "Low Stress (Low-Flow) Purging and Sampling Procedure for the Collection of Ground Water Samples from Monitoring Wells." EPA SOP No. GW4, Revision No. 4., September 19, 2017.

**Appendix B**  
**Data Validation Report and**  
**Chemical Analytical Laboratory Report**

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<b>Project:</b>	Stillwater Holdings Chevron – Environmental Services December 2025 Groundwater Samples
<b>File:</b>	0504-202-01
<b>Date:</b>	January 23, 2026

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This report documents the results of a United States Environmental Protection Agency (USEPA)-defined Stage 2A data validation (USEPA Document 540-R-08-005; USEPA, 2009) of analytical data from the analyses of water samples collected as part of the December 2025 sampling event, and the associated laboratory and field quality control (QC) samples. The samples were obtained from the Stillwater Holdings Chevron facility located at 7 East Rose Street, in Walla Walla, Washington.

## Objective and Quality Control Elements

GeoEngineers, Inc. (GeoEngineers) completed the data validation consistent with the USEPA Contract Laboratory Program National Functional Guidelines for Organic Superfund Methods Data Review (USEPA, 2020) (National Functional Guidelines) to determine if the laboratory analytical results meet the project objectives and are usable for their intended purpose. Data usability was assessed by determining if:

- The samples were analyzed using well-defined and acceptable methods that provide reporting limits below applicable regulatory criteria;
- The precision and accuracy of the data are well-defined and sufficient to provide defensible data; and
- The quality assurance/quality control (QA/QC) procedures utilized by the laboratory meet acceptable industry practices and standards.

The data validation included review of the following QC elements:

- Data Package Completeness
- Chain-of-Custody Documentation
- Holding Times and Sample Preservation
- Surrogate Recoveries
- Method and Trip Blanks
- Matrix Spikes/Matrix Spike Duplicates
- Laboratory Control Samples/Laboratory Control Sample Duplicates
- Field Duplicates

## Validated Sample Delivery Groups

This data validation included review of the sample delivery group (SDG) listed below in Table 1.

**TABLE 1. SUMMARY OF VALIDATED SAMPLE DELIVERY GROUPS**

LABORATORY SDG	SAMPLES VALIDATED
590-34832-1	AMW-01-121825, DUP-121825, AMW-02-121825, AMW-03-121825, AMW-04-121825, MW-2-121725, MW-3-121725, MW-4-121725, MW-5-121725, MW-6-121725, MW-7-121825, MW-8-121825, MW-9-121725, MARCUS WHITMAN SUMP, TRIP BLANK

## Chemical Analysis Performed

Eurofins Environment Testing, Inc. (Eurofins), located in Spokane, Washington, performed laboratory analyses on the samples using the following methods:

- Gasoline-range Hydrocarbons (NWTPH-Gx) by Method NWTPH-Gx; and
- Volatile Organic Compounds (VOCs) by Method EPA8260D

## Data Validation Summary

The results for each of the QC elements are summarized below.

### DATA PACKAGE COMPLETENESS

Eurofins provided the required deliverables for the data validation according to the National Functional Guidelines. The laboratory followed adequate corrective action processes and the identified anomalies were discussed in the relevant laboratory case narrative.

### CHAIN-OF-CUSTODY DOCUMENTATION

Chain-of-custody (COC) forms were provided with the laboratory analytical reports. The COCs were accurate and complete when submitted to the laboratory.

### HOLDING TIMES AND SAMPLE PRESERVATION

The sample holding time is defined as the time that elapses between sample collection and sample analysis. Maximum holding time criteria exist for each analysis to help ensure that the analyte concentrations found at the time of analysis reflect the concentration present at the time of sample collection. Established holding times were met for each analysis, with the exception noted below. The sample cooler arrived at the laboratory within the appropriate temperatures of between two and six degrees Celsius.

**SDG 590-34832-1:** (VOCs) The 14-day holding time for VOCs analysis was exceeded in Sample Trip blank. The reporting limits for benzene, ethylbenzene, toluene, m,p-Xylene, and total xylenes were qualified as estimated (UJ) in this sample.

## **SURROGATE RECOVERIES**

A surrogate compound is a compound that is chemically similar to the organic analytes of interest, but unlikely to be found in an environmental sample. Surrogates are used for organic analyses and are added to the samples, standards, and blanks to serve as an accuracy and specificity check of each analysis. The surrogates are added to the samples at a known concentration and percent recoveries are calculated following analysis. The surrogate percent recoveries for field samples were within the laboratory control limits.

## **METHOD AND TRIP BLANKS**

### *Method Blanks*

Method blanks are analyzed to ensure that laboratory procedures and reagents do not introduce measurable concentrations of the analytes of interest. A method blank was analyzed with each batch of samples, at a frequency of 1 per 20 samples. For each sample batch, method blanks for the applicable methods were analyzed at the required frequency. None of the analytes of interest were detected in the method blanks.

### *Trip Blanks*

Trip blanks are analyzed to provide an indication as to whether volatile compounds have cross-contaminated other like samples within the transportation process to the laboratory. None of the analytes of interest were detected in the trip blank.

## **MATRIX SPIKES/MATRIX SPIKE DUPLICATES**

Since the actual analyte concentration in an environmental sample is not known, the accuracy of a particular analysis is usually inferred by performing a matrix spike (MS) analysis on one sample from the associated batch, known as the parent sample. One aliquot of the sample is analyzed in the normal manner and then a second aliquot of the sample is spiked with a known amount of analyte concentration and analyzed. From these analyses, a percent recovery is calculated. Matrix spike duplicate (MSD) analyses are generally performed for organic analyses as a precision check and analyzed in the same sequence as a matrix spike. Using the result values from the MS and MSD, the relative percent difference (RPD) is calculated. The percent recovery control limits for MS and MSD analyses are specified in the laboratory documents, as are the RPD control limits for MS/MSD sample sets.

There were no MS/MSD sample sets performed on the associated GeoEngineers' field samples.

## **LABORATORY CONTROL SAMPLES/LABORATORY CONTROL SAMPLE DUPLICATES**

A laboratory control sample (LCS) is a blank sample that is spiked with a known amount of analyte and then analyzed. An LCS is similar to an MS, but without the possibility of matrix interference. Given that matrix interference is not an issue, the LCS/LCSD control limits for accuracy and precision are usually more rigorous than for MS/MSD analyses. Additionally, data qualification based on LCS/LCSD analyses would apply to all samples in the associated batch, instead of just the parent sample. The percent recovery control limits for LCS and LCSD analyses are specified in the laboratory documents, as are the RPD control limits for LCS/LCSD sample sets.

One LCS/LCSD analysis should be performed for every analytical batch or every 20 field samples, whichever is more frequent. The frequency requirements were met for each analysis and the percent recovery and RPD values were within the proper control limits.

## FIELD DUPLICATES

In order to assess precision, field duplicate samples were collected and analyzed along with the reviewed sample batches. The duplicate samples were analyzed for the same parameters as the associated parent samples. Precision is determined by calculating the RPD between each pair of samples. If one or more of the sample analytes has a concentration less than five times the reporting limit for that sample, then the absolute difference is used instead of the RPD. The RPD control limit for water samples is 30 percent.

**SDG 590-34832-1:** One field duplicate sample pair, AMW-01-121825 and DUP-121825, was submitted with this SDG. The precision criteria for the target analytes were met for this sample pair.

## Overall Assessment

As was determined by this data validation, the laboratory followed the specified analytical methods. Accuracy was acceptable, as demonstrated by the surrogate and LCS/LCSD percent recovery values. Precision was acceptable, as demonstrated by the LCS/LCSD and field duplicate RPD values.

The data are acceptable for the intended use, with the following qualifications listed below in Table 2.

**TABLE 2. SUMMARY OF QUALIFIED SAMPLES**

SAMPLE ID	ANALYTE	QUALIFIER	REASON
Trip blank	Benzene	UJ	Holding Time
	Ethylbenzene	UJ	Holding Time
	Toluene	UJ	Holding Time
	m,p-Xylene	UJ	Holding Time
	Total xylenes	UJ	Holding Time

## References

U.S. Environmental Protection Agency (USEPA). "Guidance for Labeling Externally Validated Laboratory Analytical Data for Superfund Use," EPA-540-R-08-005. January 2009.

U.S. Environmental Protection Agency (USEPA). Contract Laboratory Program National Functional Guidelines for Organic Superfund Methods Data Review, EPA-540-R-20-005. November 2020.

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**Appendix C**  
**Report Limitations and Guidelines for Use**

## Appendix C

### Report Limitations and Guidelines for Use<sup>1</sup>

This appendix provides information to help you manage your risks with respect to the use of this report. Please confer with GeoEngineers, Inc. (GeoEngineers) if you need to know more about how these “Report Limitations and Guidelines for Use” apply to your project or property.

#### READ THESE PROVISIONS CLOSELY

It is important to recognize that environmental engineering and geoscience practices (geotechnical engineering, geology and environmental science) are less exact than other engineering and natural science disciplines. GeoEngineers includes these explanatory “limitations” provisions in our reports to help reduce the risk of misunderstandings or unrealistic expectations that lead to disappointments, claims and disputes.

#### ENVIRONMENTAL SERVICES ARE PERFORMED FOR SPECIFIC PURPOSES, PERSONS AND PROJECTS

GeoEngineers has performed this Groundwater Monitoring Assessment of the Stillwater Holdings Chevron cleanup site located at 7 East Rose Street in Walla Walla, Washington (the “Site”). This report has been prepared for the exclusive use of Washington State Department of Ecology. This report is not intended for use by others, and the information contained herein is not applicable to other properties.

GeoEngineers structures its services to meet the specific needs of its clients. For example, an environmental site assessment study conducted for a property owner may not fulfill the needs of a prospective purchaser of the same property. Because each environmental study is unique, each environmental report is unique, prepared solely for the specific client and project site. Use of this report is not recommended for any purpose or project other than as expressly stated in this report.

#### THIS ENVIRONMENTAL REPORT IS BASED ON A UNIQUE SET OF PROJECT-SPECIFIC FACTORS

This report has been prepared for the Stillwater Holdings Chevron cleanup site located at 7 East Rose Street in Walla Walla, Washington. GeoEngineers considered a number of unique, project-specific factors when establishing the scope of services for this Project. Unless GeoEngineers specifically indicates otherwise, it is important not to rely on this report if it was:

- Not prepared for you,
- Not prepared for your Project,
- Not prepared for the specific site explored, or
- Completed before Project changes were made.

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<sup>1</sup> Developed based on material provided by GBA, GeoProfessional Business Association; [www.geoprofessional.org](http://www.geoprofessional.org).

If changes to the Project or property occur after the date of this report, GeoEngineers cannot be responsible for any consequences of such changes in relation to this report unless we have been given the opportunity to review our interpretations and recommendations in the context of such changes. Based on that review, we can provide written modifications or confirmation, as appropriate.

### **RELIANCE CONDITIONS FOR THIRD PARTIES**

This report was prepared for the exclusive use of the party(ies) to whom this report is addressed. No other party may rely on the product of our services unless we agree to such reliance in advance and in writing. Within the limitations of the agreed Project scope, schedule and budget, our services have been executed in accordance with our Agreement with the Client and generally accepted environmental practices in this area at the time this report was prepared.

### **UNDERSTAND THAT GEOTECHNICAL ISSUES HAVE NOT BEEN ADDRESSED**

Unless geotechnical engineering was specifically included in our scope of service, this report does not provide any geotechnical findings, conclusions, or recommendations, including but not limited to, the suitability of subsurface materials for construction purposes.

### **DO NOT SEPARATE DOCUMENTATION FROM THE REPORT**

Environmental reports often include supplemental documentation, such as maps, figures and table. Do not separate such documentation from the report. Further, do not, and do not permit any other party to redraw or modify any of the supplemental documentation for incorporation into other professionals' instruments of service.

### **ENVIRONMENTAL REGULATIONS CHANGE AND EVOLVE**

Some substances may be present in the vicinity of the subject property in quantities or under conditions that may have led, or may lead, to contamination of the subject property, but are not included in current local, state, or federal regulatory definitions of hazardous substances or do not otherwise present current potential liability. GeoEngineers cannot be responsible if the standards for appropriate inquiry, or regulatory definitions of hazardous substances, change or if more stringent environmental standards are developed in the future.

### **UNCERTAINTY MAY REMAIN EVEN AFTER THIS PROJECT IS COMPLETED**

Performance of an environmental assessment is intended to reduce uncertainty regarding the potential for contamination in connection with a property, but no environmental assessment can wholly eliminate that uncertainty. Our interpretation of subsurface conditions in this study is based on field observations and chemical analytical data from widely spaced sampling locations. It is always possible that contamination exists in areas that were not explored, sampled or analyzed.

### **SUBSURFACE CONDITIONS CAN CHANGE**

This environmental report is based on conditions that existed at the time the study was performed. The findings and conclusions of this report may be affected by the passage of time, by man-made events such as construction on or adjacent to the subject property, by new releases of hazardous substances, new

information or technology that become available subsequent to the report date, or by natural events such as floods, earthquakes, slope instability or groundwater fluctuations. Please contact GeoEngineers before applying this report for its intended purpose so that GeoEngineers may evaluate whether changed conditions affect the continued applicability of the report.

## **SOIL AND GROUNDWATER END USE**

The cleanup levels referenced in this report are site- and situation-specific. The cleanup levels may not be applicable for other properties or for other on-site uses of the affected soil and/or groundwater. Note that hazardous substances may be present in some of the on-site soil and/or groundwater at detectable concentrations that are less than the referenced cleanup levels. GeoEngineers should be contacted prior to the export of soil or groundwater from the subject property or reuse of the affected soil or groundwater on-site to evaluate the potential for associated environmental liabilities. GeoEngineers will not assume responsibility for potential environmental liability arising out of the transfer of soil and/or groundwater from the subject property to another location, or the reuse of such soil and/or groundwater on-site in any instances that we did not recommend, know of, or control.

## **MOST ENVIRONMENTAL FINDINGS ARE PROFESSIONAL OPINIONS**

Our interpretations of subsurface conditions are based on field observations and chemical analytical data from widely spaced sampling locations at the subject property. Site exploration identifies subsurface conditions only at those points where subsurface tests are conducted or samples are taken. GeoEngineers reviewed field and laboratory data and then applied professional judgment to render an informed opinion about subsurface conditions throughout the property. Actual subsurface conditions may differ significantly from those indicated in this report. Our report, conclusions and interpretations should not be construed as a warranty of the subsurface conditions.

## **DO NOT REDRAW THE EXPLORATION LOGS**

Environmental scientists prepare final boring and testing logs based upon their interpretation of field logs and laboratory data. To prevent errors or omissions, the logs included in an environmental report should never be redrawn for inclusion in other design documents. Only photographic or electronic reproduction that preserves the entire original boring log is acceptable, but separating logs from the report can create increase the risk of potential misinterpretation.

## **BIOLOGICAL POLLUTANTS**

GeoEngineers' Scope of Work specifically excludes the investigation, detection, prevention, or assessment of the presence of Biological Pollutants. Accordingly, this report does not include any interpretations, recommendations, findings or conclusions regarding the detecting, assessing, preventing or abating of Biological Pollutants, and no conclusions or inferences should be drawn regarding Biological Pollutants as they may relate to this Project. The term "Biological Pollutants" includes, but is not limited to, molds, fungi, spores, bacteria and viruses, and/or any of their byproducts.

A Client that desires these specialized services is advised to obtain them from a consultant who offers services in this specialized field.

## **INFORMATION PROVIDED BY OTHERS**

GeoEngineers has relied upon certain data or information provided or compiled by others in the performance of our services. Although we use sources that we reasonably believe to be trustworthy, GeoEngineers cannot warrant or guarantee the accuracy or completeness of information provided or compiled by others.

