FARALLON CONSULTING

August 24, 2026

Joseph Hunt
Washington State Department of Ecology
Toxics Cleanup Program – Southwest Region
PO Box 47775
Olympia, Washington

RE: WORKPLAN FOR SUPPLEMENTAL REMEDIAL INVESTIGATION
LAKEVIEW FACILITY
2800 104TH STREET COURT SOUTH
LAKEWOOD, WASHINGTON
FARALLON PN: 188-004.002

Dear Joseph Hunt,

Farallon Consulting, L.L.C. (Farallon) has prepared this Work Plan on behalf of Woodworth Capital, Inc. (formerly Woodworth and Company, Inc.) to conduct supplemental remedial investigation (RI) activities at the Lakeview Facility at 2800 104th Street Court South in Lakewood, Washington (Figure 1), in response to the Washington State Department of Ecology (Ecology) February 4, 2026 Technical Assistance Letter (2026 Technical Assistance Letter),[1] following its review of Farallon's Interim Action Report dated December 30, 2025 (Interim Action Report).[2]

The Site, as defined under the Washington State Model Toxics Control Act Cleanup Regulation (MTCA) and its implementing regulations as established in Chapter 173-340 of the Washington Administrative Code (WAC 173-340), comprises the areas of the Lakeview Facility where hazardous substances have come to be located. The Site is registered with Ecology as "Woodworth & Co Inc Lakeview Plant," and has been assigned Cleanup Site Identification No. 165 and Facility Identification No. 1372. The Site is enrolled in Ecology's Voluntary Cleanup Program under Identification No. SW1012. Woodworth and Company, Inc. previously owned the Site and is conducting the cleanup. The Site currently is owned and operated by Miles Resources, Inc. (Miles).

[1] Washington State Department of Ecology (Ecology). 2026. Letter Regarding Technical Assistance to Complete the Remedial Investigation at the Woodworth & Co. Lakeview Plant, 2800 104th Street South, Tacoma (Lakewood), Washington. From Joseph Hunt. To Greg Peters, Farallon Consulting, L.L.C. February 4.
[2] Farallon Consulting. L.L.C. 2025. Interim Action Report, Woodworth & Company Inc., Lakeview Facility, 2800 104th Street South, Lakewood, Washington 98499. Prepared for Woodworth Capital, Inc. December 30.

The supplemental RI activities described in this Work Plan are intended to address the data gaps identified by Ecology in the February 2026 Technical Assistance letter to demonstrate the following:

- Releases of hazardous substances are appropriately delineated and remediated at the Site and providing assurances that future releases of hazardous substances will be prevented;
- Contamination within the shallow, deep, and regional aquifers will not impact the Lakewood Water District drinking water system;
- Provision of sufficient data for Ecology to adequately evaluate groundwater contaminant trends and the reasonableness of proposed restoration time frames; and
- Adequate definition of the lateral and vertical extents of contamination in all water-bearing zones and other select areas of the Site identified by Ecology.

This Work Plan presents a description of Farallon's understanding of the Site and a discussion of the scope of work to address the data gaps identified by Ecology.

FACILITY DESCRIPTION

The Lakeview Facility consists of Tacoma–Pierce County Parcel Nos. 0319061135, 0319061136, 0319062075, and 0319062076, together totaling approximately 60 acres of land.

The Lakeview Facility was first developed between 1946 and 1969 for surface sand and gravel mining operations. Hot-mix asphalt production reportedly commenced on the Lakeview Facility in 1971. Sand and gravel mining operations continued until the late 1980s, at which time the raw materials for asphalt production were imported to the Lakeview Facility. Between the 1980s and early 1990s, the Washington State Department of Transportation (WSDOT) operated a mobile laboratory on the Lakeview Facility for the testing of asphalt mix, which included use of trichloroethene (TCE) in the asphalt-testing process. WSDOT personnel reportedly disposed of spent TCE by pouring the substance directly into the soil. Although the exact location of the former WSDOT mobile laboratory is unknown, Farallon learned from interviews with facility personnel that its likely location was the area between the asphalt plant and the roofing shredder building (Figure 2).

Various portions of the four parcels have been mined for sand and gravel and used for a permitted thermal desorption treatment of petroleum-contaminated soil from off-site locations. The Lakeview Facility has been used for recycling imported asphalt and concrete debris and for producing hot- and cold-mix asphalt. Other facility uses have included the parking and maintenance of trucks and construction and paving equipment owned and operated previously by Woodworth and currently by Miles. Structures on the Lakeview Facility include an asphalt processing plant, a truck maintenance shop building, a Quonset building used for the shredding and recycling of asphalt shingles, and several small sheds and job-site trailers used for storage, office space, or maintenance activities (Figure 2).

SITE HYDROGEOLOGY

Three water-bearing zones are present at the Lakeview Facility:

- **Shallow Water-Bearing Zone (SWBZ)**: A discontinuous, under predominantly perched conditions, and largely unconfined groundwater zone encountered at depths ranging from approximately 5 to 40 feet below ground surface (bgs) due to variations in the ground surface elevations across the Lakeview Facility. The groundwater elevations for the top of the SWBZ indicate a groundwater surface depression near the central portion of the Site. The general groundwater flow direction is radial toward the groundwater surface depression and is generally north-northeast in the area proximate to the former Asphalt-Testing Laboratory Area and west-southwest in the northeastern portion of the Lakeview Facility.
- **Deep Water-Bearing Zone (DWBZ):** A groundwater zone encountered across the Lakeview Facility at depths ranging from approximately 28 to 72 feet bgs. The DWBZ transitions from confined conditions in the east to unconfined conditions in the central portion of the facility. A leaky aquitard consisting of sandy silt and silty gravel with sand sediments separates the SWBZ from the DWBZ. Groundwater flow direction in the DWBZ ranges from the northwest in the southern portion of the Lakeview Facility to the northeast in the northern down-gradient portion of the facility.
- **Regional Aquifer (RA):** An aquitard consisting of silt and silty gravel sediments was encountered at the base of the DWBZ in a number of monitoring wells at the Lakeview Facility. This aquitard generally separates the DWBZ from a regional aquifer that provides water for the water-supply well used for industrial processes at the Lakeview Facility. The direction of groundwater flow in the RA appears to be similar to the SWBZ, flowing toward the central portion of the Lakeview Facility.

SUMMARY OF ENVIRONMENTAL CONDITIONS

Multiple phases of RI and interim actions have occurred at the Lakeview Facility. Based on the results from those activities, the constituents of potential concern at the Site include total petroleum hydrocarbons as diesel-range organics (DRO) and as oil-range organics (ORO), polar metabolites (PMs), carcinogenic polycyclic aromatic hydrocarbons (cPAHs), arsenic, and TCE.

DRO plus ORO impacts exceeding the MTCA Method A cleanup level are present in discrete areas in the SWBZ and in two discrete areas in the DWBZ. The sampling results using silica gel cleanup indicate that DRO and ORO are highly weathered and have undergone significant natural attenuation processes where only PMs currently remain at the Site. PAHs, including cPAHs and non-carcinogenic PAHs, were not detected at concentrations exceeding MTCA Method A cleanup levels in any of the groundwater samples analyzed.

There is no apparent evidence of TCE migration from an off-site source onto the Lakeview Facility at this time. The TCE occurrence in the RA near the location of the Lakeview Facilities industrial water well is more likely than not associated with the historical release from the WSDOT mobile testing lab that formerly operated at the facility. TCE has migrated vertically from the SWBZ into the DWBZ and penetrated through the silt and silty gravel aquitard into the RA.

The construction and current operation of the on-Site industrial water well does not appear to exacerbate the vertical migration of TCE into the RA. The silt and silty gravel aquitard is likely transmissive at some locations and the low-level TCE appears to have migrated to the RA under natural conditions induced by a vertical gradient.

Concentrations of TCE at the base of the DWBZ and within the RA do not exceed the MTCA Method A cleanup level. A review of sampling data for the nearby water supply wells within and outside the Lakewood Water District demonstrates that these wells are not impacted by TCE and are not at future risk by TCE present at the Lakeview Facility.

Significant soil source removal has occurred in numerous areas at the Site. There are limited areas of remaining soil impacted with concentrations exceeding MTCA Method A levels. All of these remaining soil impacts are within the boundaries of the Lakeview Facility.

ECOLOGY DATA GAPS

This Work Plan has been prepared in response to the 2026 Technical Assistance Letter, which describes the additional RI activities necessary to complete the remedial investigation for the Site. Ecology identified the following data gaps requiring additional characterization and sampling of groundwater at the Site:

- Delineation of contamination and groundwater gradient in the DWBZ within the western half of the Lakeview Facility and along the western facility boundary;
- Delineation of DRO, ORO, and PM plumes in the SWBZ and DWBZ at existing monitoring wells MW-4, MW-9A/MW-9D, MW-9R, MW-11/MW-X, MW-13, MW-18, MW-36, MW-16R, and SVE-2;
- Decommissioning of monitoring wells SVE-3, SVE-6, and SVE-10 that were screened across both the SWBZ and the DWBZ;
- Resampling of the DWBZ wells around the TCE plume to provide current data on plume extent;
- Evaluation of the SWBZ and DWBZ near monitoring well MW-13 (Equipment Parking Area), former boring B-19 (Hot Mix Area), former boring B-12 (Equipment Storage/Carport Area), and former boring B-16 (Former Asphalt Lab Testing Area); and
- Installation of both a DWBZ monitoring well and another RA monitoring well along the southwestern margin of the Lakeview Facility and to the west of the TCE plume to refine the groundwater gradient within that area of the facility and the Lakeview Facility as a whole and to serve as a potential cross-gradient data point in support of potential future monitored natural attenuation (MNA)-type applications.

A detailed summary of each data gap and proposed action to address each data gap is provided in detail in Attachment A.

SUPPLEMENTAL REMEDIAL INVESTIGATION SCOPE OF WORK

The supplemental RI scope of work includes the installation of 28 permanent groundwater monitoring wells in the SWBZ, DWBZ, and RA using sonic drilling technology at selected areas across the Lakeview Facility. The preliminary locations of the monitoring wells are

shown on Figure 2. The final monitoring well locations may be modified as necessary based on access limitations, the presence of utilities, and/or surface conditions.

The supplemental RI activities will consist of the following:

- Installation of 17 monitoring wells in the SWBZ to further evaluate and/or delineate the extent of DRO, ORO, and PM in selected areas across the Lakeview Facility;
- Installation of 10 monitoring wells in the DWBZ to further evaluate and delineate the extents of DRO, ORO, PM, and TCE in selected areas across the Lakeview Facility;
- Installation of one monitoring well in the RA to further evaluate and delineate the extent of TCE in the southwestern portion of the Lakeview Facility;
- Permanent decommissioning of SVE wells SVE-3, SVE-6, and SVE-10; and
- Collection and analysis of groundwater samples from the newly installed and selected wells and from existing monitoring wells.

HEALTH AND SAFETY

Prior to the start of the additional RI activities, Farallon will prepare a Site-specific Health and Safety Plan as required by Part 1910 of Title 29 of the Code of Federal Regulations. Public and private utility-locating services also will be retained, to clear proposed boring or sampling locations, and to provide additional information pertaining to the locations of subsurface utilities. Boring locations may be adjusted as necessary based on access limitations and the presence of utilities.

MONITORING WELL CONSTRUCTION

As described above, a total of 28 borings will be completed as monitoring wells during the supplemental investigation (Figure 2). The monitoring wells will be installed using 2-inch-diameter polyvinyl chloride well casings with a 0.010-inch slotted well screen. A filter pack consisting of No. 10/20 Colorado Silica Sand will be placed around the monitoring well screens. The boreholes will be sealed to within 2 feet of the surface with hydrated bentonite chips. The monitoring wells will be completed with flush-mounted steel monuments set in concrete and developed following installation. Monitoring well development will consist of surging and pumping with a submersible pump until the majority of the fine-grained sediment in the well and surrounding filter pack has been removed and purge water appears relatively clear.

Farallon will contract a Washington State-licensed surveyor to perform a survey of the newly installed monitoring wells. The survey will include measurement of the elevation of the top of the monitoring well casings in reference to the North American Vertical Datum of 1998 to assist in the calculation of groundwater elevations and interpretation of groundwater flow and gradient.

MONITORING WELL DECOMMISSIONING

Farallon will oversee the permanent decommissioning of SVE wells SVE-3, SVE-6, and SVE-10 that were screened across both the SWBZ and DWBZ (Figure 2). The SVE wells will be decommissioned by a licensed driller in accordance with the Minimum Standards for Construction and Maintenance of Wells as established in WAC 173-160. Well decommissioning activities will include removing the well monuments, sealing the well casing by adding bentonite chips, and restoring the surface to match the surrounding finish and grade.

GROUNDWATER MONITORING AND SAMPLING

A groundwater monitoring event will be performed after a minimum of 48 hours following monitoring well installation and well development activities. The groundwater monitoring event will include measuring depth-to-groundwater at all accessible monitoring wells at the Site and collecting groundwater samples using low-flow sampling methods from selected monitoring wells. Farallon field personnel will remove the locking well cap from each monitoring well to allow groundwater levels to equilibrate to atmospheric pressure for a minimum of 30 minutes. The depth to groundwater will be measured from the top of the well casing in each monitoring well to the nearest 0.01 foot using an electronic water-level measuring device. The total depth of each monitoring well will be measured to evaluate siltation of the well-screen interval.

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

LABORATORY ANALYSES

The groundwater samples will be submitted to Friedman and Bruya Inc. of Seattle, Washington (F&B) under standard chain-of-custody protocols for one or more of the following analyses:

- HVOCs by U.S. Environmental Protection Agency (EPA) Method 8260D;
- DRO and ORO by Northwest Method NWTPH-Dx with and without silica gel cleanup procedure; and
- Total organic carbon by Method SM5310C.

REPORTING

Assuming that all data gaps required to complete the RI phase of work are addressed by the scope of work outlined in this Work Plan, reporting will include a preparation of Remedial Investigation and Focused Feasibility Study report (RI/FFS) that meets the requirements of WAC 173-350-350 and -351 to document the following:

- The characterization of the Site, including the distribution of hazardous substances and the threat they pose to human health and the environment; and
- Evaluation of cleanup action alternatives to enable the selection of a cleanup action that meets the requirements in WAC 173-340-360 and conforms, as appropriate, to the expectations in WAC 173-340-370. Farallon has previously prepared an RI and FFS for the Site.

CLOSING

The Work Plan presented herein will be implemented following review and receipt of approval from Ecology.

Please contact either of the undersigned at (425) 295-0800 if you have questions or need additional information.

Sincerely,

Farallon Consulting, L.L.C.

Greg Peters
Associate Environmental Scientist

Pete Kingston, L.G.
Principal Geologist

Attachments: Figure 1, *Site Vicinity*
Figure 2, *Site Plan with Proposed Monitoring Well Locations*
Attachment A, Data Gaps Summary

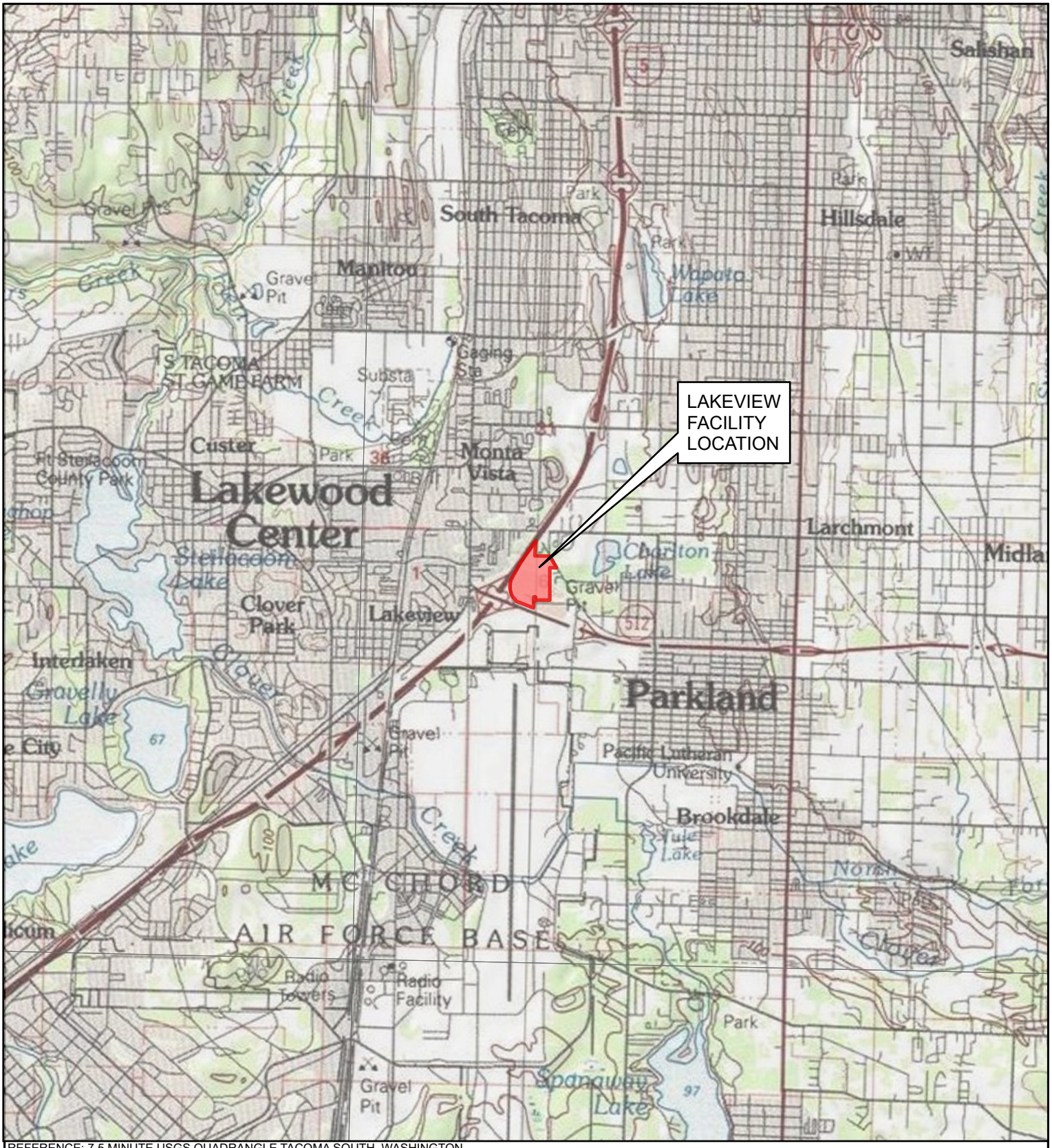
cc: Jeff Woodworth, Woodworth Capital Inc

GP/PK:cm

FIGURES

WORKPLAN FOR SUPPLEMENTAL REMEDIAL INVESTIGATION
Lakeview Facility
2800 104th Street Court
Lakewood, Washington

Farallon PN: 188-004.002



REFERENCE: 7.5 MINUTE USGS QUADRANGLE TACOMA SOUTH, WASHINGTON



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FIGURE 1

VICINITY MAP
LAKEVIEW FACILITY
2800 104th STREET COURT SOUTH
LAKEWOOD, WASHINGTON

FARALLON PN: 188-004

Drawn By: jjones Checked By: GP Date: 7/21/2026 Figure-01_SiteVicinity

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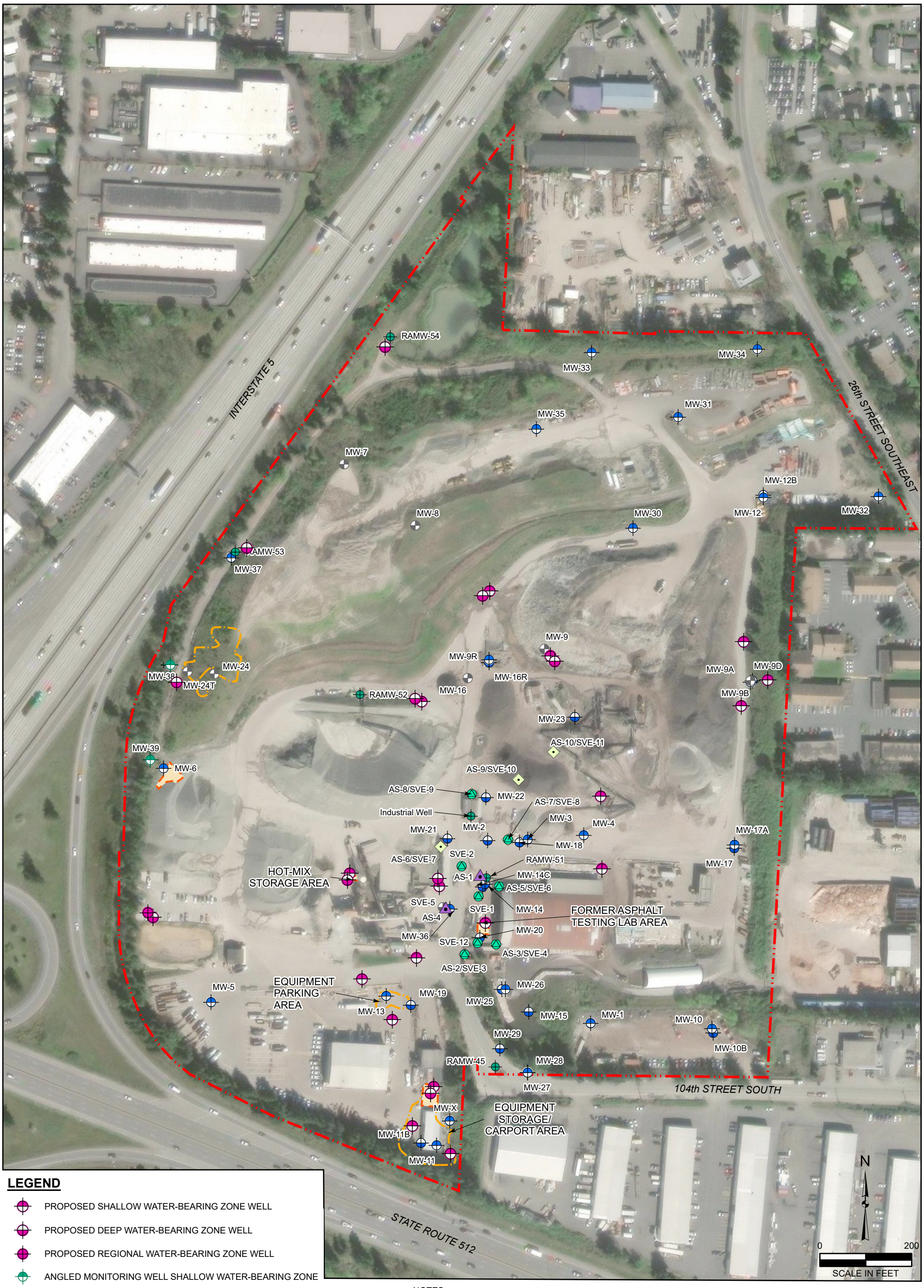

LEGEND

- PROPOSED SHALLOW WATER-BEARING ZONE WELL
- PROPOSED DEEP WATER-BEARING ZONE WELL
- PROPOSED REGIONAL WATER-BEARING ZONE WELL
- ANGLED MONITORING WELL SHALLOW WATER-BEARING ZONE
- MONITORING WELL DEEP WATER-BEARING ZONE
- MONITORING WELL SHALLOW WATER-BEARING ZONE
- REGIONAL AQUIFER WELL
- DECOMMISSIONED WELL
- AIR SPARGE/SOIL VAPOR EXTRACTION WELL PAIR
- AIR SPARGE WELL
- SOIL VAPOR EXTRACTION WELL
- EXCAVATION LIMITS (OCTOBER, 2025)
- EXCAVATION LIMITS (2010)
- PROPERTY BOUNDARY

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

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FIGURE 2

PROPOSED MONITORING WELL LOCATIONS
LAKEVIEW FACILITY
2800 104th STREET COURT SOUTH
LAKEWOOD, WASHINGTON

FARALLON PN: 188-004

Drawn By: jjones | Checked By: GP | Date: 7/22/2026 | Figure-03_Proposed-MWs

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ATTACHMENT A
DATA DAPS SUMMARY

WORKPLAN FOR SUPPLEMENTAL REMEDIAL INVESTIGATION
Lakeview Facility
2800 104th Street Court
Lakewood, Washington

Farallon PN: 188-004.002

Attachment A
Data Gaps Summary
Lakeview Facility
Lakewood, Washington
Farallon PN: 188-004.002

Data Gap Type	Data Gap Description	Proposed Actions	Proposed Sample Analyses
Groundwater Contamination Delineation	Delineation of contamination and groundwater gradient in the deep water-bearing zone (DWBZ) within the western half of the Site and along the western Site boundary.	Four DWBZ monitoring wells will be installed to further delineate contamination and groundwater gradient within the western half of the Site and along the western Site boundary. The proposed locations of these monitoring wells are shown on Figure 2.	HVOCs by EPA Method 8260D; and DRO/ORO by NWTPH-Dx (with/without SGC)
	Delineation of the diesel range organics (DRO), oil-range organics (ORO) and polar metabolites (PM) plumes in the shallow water-bearing zone (SWBZ) and deep water-bearing zone (DWBZ) proximate to monitoring well MW-4.	Two SWBZ monitoring wells will be installed to the northeast and southeast of monitoring well MW-4. These wells along with existing SWBZ monitoring well MW-3 will be used to further delineate groundwater contamination proximate to monitoring well MW-4. The proposed locations of these monitoring wells are shown on Figure 2.	DRO/ORO by NWTPH-Dx (with/without SGC) Select samples for TOC by SM5310C
	Delineation of the DRO/ORO/PM plumes in the SWBZ/DWBZ's proximate to monitoring well MW-9A.	Three SWBZ monitoring wells will be installed to the north, south and east of monitoring well MW-9A to further delineate groundwater contamination. The proposed locations of these monitoring wells are shown on Figure 2.	
	Delineation of the DRO/ORO/PM plumes in the SWBZ/DWBZ's proximate to monitoring well MW-9R.	Three SWBZ and three DWBZ monitoring wells will be installed to the north, southwest and east of monitoring well MW-9R to further delineate groundwater contamination. The proposed locations of these monitoring wells are shown on Figure 2.	
	Delineation of the DRO/ORO/PM plumes in the SWBZ/DWBZ's proximate to monitoring well MW-11/MW-X.	Three SWBZ and one DWBZ monitoring wells will be installed to the southeast, west and northwest of monitoring wells MW-11 and MW-X to further delineate groundwater contamination. Existing SWBZ monitoring well MW-27 will be used to delineate groundwater contamination towards the northeast. The location of these proposed monitoring wells are shown on Figure 2.	
	Delineation of the DRO/ORO/PM plumes in the SWBZ/DWBZ's proximate to monitoring well MW-13.	Three SWBZ monitoring wells will be installed to the south, northwest and northeast of monitoring well MW-13 to further delineate groundwater contamination. Existing DWBZ monitoring well MW-19 will be used to further delineate groundwater contamination proximate to monitoring well MW-13. The proposed locations of these monitoring wells are shown on Figure 2.	
	Delineation of the DRO/ORO/PM plumes in the SWBZ/DWBZ's proximate to monitoring well MW-36.	Three SWBZ monitoring wells will be installed to the southwest, southeast and north of monitoring well MW-36 to further delineate groundwater contamination. The proposed locations of these monitoring wells are shown on Figure 2.	
	Delineation of the DRO/ORO/PM plumes in the SWBZ/DWBZ's proximate to monitoring well MW-16R.	Three SWBZ and three DWBZ wells will be installed to the southwest, east and north of monitoring well MW-16R to further delineate groundwater contamination. The proposed locations of these monitoring wells are shown on Figure 2.	
	Delineation of the DRO/ORO/PM plumes in the SWBZ/DWBZ's proximate to monitoring well SVE-2.	One SWBZ and one DWBZ monitoring well will be installed southwest of monitoring well SVE-2 and existing DWBZ monitoring wells MW-2, MW-14 and MW-21 located to the northwest, northeast, and southeast will be used to further delineate groundwater contamination.	

Attachment A
Data Gaps Summary
Lakeview Facility
Lakewood, Washington
Farallon PN: 188-004.002

Data Gap Type	Data Gap Description	Proposed Actions	Proposed Sample Analyses
Monitoring Well Decommissioning	Decommissioning of soil vapor extraction wells (SVE-3, SVE-6 and SVE-10) that were completed across both the SWBZ and DWBZ. Ecology understands that SVE-10 is currently covered with a gravel pile and will be decommissioned when exposed.	Monitoring wells SVE-3, SVE-6 and SVE-10 will be decommissioned by a licensed driller in accordance with the Minimum Standards for Construction and Maintenance of Wells as established in WAC 173-160.	N/A
Groundwater Contamination Evaluation	Resampling DWBZ monitoring wells around the trichloroethene (TCE) plume to provide current data on plume extent.	Monitoring wells MW-18, MW-21, MW-25, SVE-9 and SVE-11 will be sampled to evaluate the current extent of the TCE plume. The locations of these monitoring wells are shown on Figure 2.	HVOCs by EPA Method 8260D
	Evaluation of the SWBZ and DWBZ near monitoring well MW-13 (Equipment Parking Area).	SWBZ monitoring wells will be installed to the south, northwest and northeast of monitoring well MW-13 to further delineate groundwater contamination. The proposed locations of these monitoring wells are shown on Figure 2. Existing DWBZ monitoring well MW-19 will be used to further delineate groundwater contamination proximate to monitoring well MW-13.	DRO/ORO by NWTPH-Dx (with/without SGC)
	Evaluation of the SWBZ and DWBZ near former boring B-19 (Hot Mix Area).	A SWBZ monitoring well and a DWBZ monitoring well will be installed proximate to former boring B-19 in the Hot Mix Storage Area to evaluate groundwater contamination. The proposed locations of these monitoring wells are shown on Figure 2.	
	Evaluation of the SWBZ and DWBZ near former boring B-12 (Equipment Storage/ Carport Area).	A SWBZ monitoring well will be installed proximate to former B-16 in the Former Asphalt Testing Area to evaluate groundwater contamination and existing DWBZ monitoring well MW-20 will used to evaluate groundwater contamination. The location of these monitoring wells are shown on Figure 2.	
	Evaluation of the SWBZ and DWBZ near former boring B-16 (Former Asphalt Testing Area).	A SWBZ monitoring well and a DWBZ monitoring well will be installed proximate to former boring B-12 in the Equipment Storage/ Carport Area to evaluate groundwater contamination. The proposed locations of these monitoring wells are shown on Figure 2.	
	Installation of a DWBZ and another regional aquifer (RA) monitoring well along the southwestern margin of the Site and to the west of the TCE plume. Such an installation would refine the groundwater gradient within that area of the Site and the Site as a whole and will serve as a potential cross-gradient data point which is required under MTCA in support of potential future monitored natural attenuation-type applications.	A DWBZ monitoring well and an RA monitoring well will be installed in the southwestern portion of the Site and to west of the existing TCE plume to further refine groundwater contamination and gradient in the DWBZ and RA in this portion of the Site. The proposed locations of these monitoring wells are shown on Figure 2.	HVOCs by EPA Method 8260D; and DRO/ORO by NWTPH-Dx (with/without SGC)

NOTES:

DRO = diesel-range organics
DWBZ = deep water-bearing zone
MTCA = Washington State Model Toxics Control Act
N/A = not applicable
HVOCs = halogenated volatile organic compounds
ORO = oil-range organics
PM = polar metabolites
RA = regional aquifer
SWBZ = shallow water-bearing zone
SGC = silica gel cleanup
TOC = total organic carbon