



WASHINGTON STATE
DEPARTMENT OF
E C O L O G Y

Southwest Regional Office
Toxics Cleanup Program
PO Box 47775
Olympia, WA 98504-7775
360-407-6240

TRANSMITTAL MEMO

Date: March 17, 2014

TO: Mr. David Sizemore
Founder's Choice

RE: SW1292

Subject: Explanation of Timeline

NOTE: The determination date is the date Ecology approved the No Further Action status for the site. Final payment, EIM Data submission, once received, the NFA letter was released.

Ecology Determination date: February 24, 2014

Email Customer Notification: February 21, 2014

Payment received date: March 12, 2014

EIM Data successfully uploaded: February 26, 2014

Ecology Determination letter mailed/sent: March 17, 2014



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

PO Box 47775 • Olympia, Washington 98504-7775 • (360) 407-6300

February 24, 2014

Mr. Dave Sizemore
Founder's Choice Cabinet & Countertops
1517 South Tacoma Way
Tacoma, WA 98409

Re: No Further Action at the following Site:

- **Site Name:** Founder's Choice
- **Site Address:** 1517 South Tacoma Way, Tacoma, WA
- **Facility/Site No.:** 8569
- **Cleanup Site ID No.:** 12105
- **VCP Project No.:** SW1292

Dear Mr. Sizemore:

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

Issue Presented and Opinion

Is further remedial action necessary to clean up contamination at the Site?

No. Ecology has determined that no further remedial action is necessary to clean up contamination at the Site.

This opinion is dependent on the continued performance and effectiveness of the post-cleanup controls and monitoring specified below.

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

Description of the Site

This opinion applies only to the Site described below. The Site is defined by the nature and extent of contamination associated with the following release:



Ecology has determined your characterization of the Site is sufficient to establish cleanup standards and select a cleanup action. The Site is described above and in **Enclosure A**.

The Site is currently a commercial property surrounded by other industrial and commercial buildings, paved parking lots, access roads, and public right-of-ways. The Site is bounded to the south by South Tacoma Way and Interstate #5, and to the east, north, and west by several businesses, including Simco Distributing, Coast Home Improvement, US Sheet Metal, Garbar Electric, and Ply-trim West.

Records indicate that there was an historic gas station adjacent to the subject Site. There were also a 1,700-gallon underground storage tank (UST) used to store bunker-C oil and a 500-gallon UST used to store heating oil on Site. Both USTs were removed in 1992 from the Site.

Confirmation soil sampling after the removal of the 1,700-gallon UST indicated that there was residual contamination on the sidewall of the removal pit adjacent to the building's foundation, heavy oil was at a concentration of 812 milligrams per kilogram (mg/kg). This concentration was above the MTCA cleanup level at the time (200 mg/kg) but is below the current MTCA Method A cleanup level of 2,000 mg/kg.

There was no soil confirmation sampling following the 500-gallon heating oil UST removal.

The former 1700-gallon bunker-C UST area was considered to meet the MTCA cleanup level and no further investigation was conducted. Site investigation was conducted in 2012 and 2013 through several events to investigate the former gas station and the 500-gallon UST removal area.

Event 1 was conducted on September 12, 2012 and four soil borings were drilled (see Figure 2 in Enclosure A) to investigate both former gas station and former heating oil UST areas.

Soil borings B1, B2, and B4 were drilled at the former gas station to depths ranging from 19 to 30 feet below ground surface (bgs). A photoionization detector (PID) was used to screen soil and no indication of impact was found. One soil sample was collected from the bottom of each boring at 25, 30, and 19 feet bgs, respectively. The samples were analyzed for gasoline-range total petroleum hydrocarbons (TPH-Gx) and volatile organic compounds (VOCs) by EPA method 8260C. All samples were non-detect. These results, together with UST removal confirmation sampling indicate that the soil at the former gas station area was not impacted.

Soil boring B-3 was drilled in the vicinity of the suspected location of the former 500-gallon heating oil UST. A pronounced petroleum odor was noted during the drilling, and soil was sampled at 13.5 and 19 feet bgs and analyzed for diesel-range total petroleum hydrocarbons (TPH-Dx). Soil at 13.5 feet bgs detected TPH-Dx at 4,090 mg/kg, exceeding the MTCA Method A cleanup level of 2,000 mg/kg.

Event 5 was groundwater investigations and monitoring well installation work conducted in April to May 2013. Four groundwater monitoring wells (MW1 through MW4) were installed along or outside the previously delineated lateral boundary of the soil contamination plume (see Figure 5 of Enclosure A). Groundwater was encountered at 29 to 34 feet bgs. All groundwater was sampled and was non-detect for TPH-Dx and oil-range TPH.

During **Event 5**, one soil boring (B20) was also drilled near B-13, where the soil contamination was previously detected at 24 feet bgs and the vertical extent of the soil plume had not been defined. Four soil samples were collected from B-20 at the depths of 25.5, 27, 30, and 32 feet bgs. The two shallower samples detected TPH-Dx at 10,720 mg/kg and 3,420 mg/kg, respectively, above the MTCA Method A cleanup level, and the two deeper samples detected TPH-Dx at 570 and 1,190 mg/kg, respectively, below the MTCA Method A cleanup level.

Ecology issued a Further Action (FA) letter requiring the installation of another groundwater monitoring well in the middle of the soil plume. **Event 6** was subsequently conducted in responding to Ecology's request on October 17-18, 2013. The fifth groundwater well was installed in the middle of the confirmed soil plume, and one round of groundwater table monitoring was also conducted.

Based on review of the available information, Ecology has determined that the Site characterization is sufficient to define the extent of soil contamination. Groundwater at the Site was not impacted.

2. Establishment of cleanup standards.

Ecology has determined the cleanup levels and points of compliance you established for the Site meet the substantive requirements of MTCA.

The MTCA Method A cleanup levels for soil were used for the Site. Standard points of compliance were used for the Site. The point of compliance for protection of groundwater was established in the soil throughout the Site. For soil cleanup levels based on human exposure via direct contact or other exposure pathways where contact with the soil is required to complete the pathway, the point of compliance was established in the soils throughout the Site from the ground surface to 15 feet bgs. In addition, the point of compliance for groundwater was established throughout the Site from the uppermost level of the saturated zone extending vertically to the lower most depth that could potentially be affected by the Site.

Site disposal; 3) Institutional controls and long-term groundwater monitoring, and 4) In-situ thermal desorption. The FS concluded that the most feasible and preferred option was option 3, institutional controls and long-term groundwater monitoring.

The cost of partial and complete excavation, and the in-situ thermal desorption were estimated ranging \$211,400 to \$460,000, which are substantially disproportionate to the reduction of risk when compared to the preferred option of implementing Institutional Control with an EC to achieve the same purpose of protecting human health and the environment.

The Institutional Control allows for both short- and long-term effectiveness. Given the fact that groundwater was not impacted at the Site even though the UST had been at the Site for an unknown but a considerable length of time before it was removed in 1992, the short-term risk of the residual soil contamination impacting groundwater appears to be low. The planned long-term groundwater monitoring described in the Long-Term Groundwater Monitoring Plan (attached) will provide data for on-going assessment regarding the effectiveness of the Institutional Controls.

Ecology concurred that it would be cost-prohibitive to implement options 1, 2 and 4. Ecology considered Option 3 (Institutional controls and long-term groundwater monitoring) to be acceptable because:

1. All the soil contamination is below 10 feet bgs, and the soil contamination is covered below the asphalt surface and the building, with the EC filed with Pierce County, Washington, all the on-Site activities involving the moving, disturbing of the contaminated soil are restricted and the direct contact pathway for the contaminants to impact human health will not be completed.
2. Groundwater was found not impacted by the soil contamination even though the soil contamination has been at the Site since an unknown time before 1992. Calculation using Ecology's MTCATPH11.1 evaluation tool with the VPH data indicated that the Site passed the groundwater leaching pathway and the risk of groundwater contamination is low.
3. Five groundwater monitoring wells have been installed at the Site including one in the middle, and four immediately outside the boundary of the soil contamination. These monitoring wells will sufficiently capture the development of groundwater contamination if it occurs.
4. The soil contamination will not impose any vapor intrusion issues to the current building because 1) the aged diesel-range TPH has limited potential to produce vapors, 2) the current building has an open-basement storage area that will allow the vapor to disperse if it occurs at all.

Periodic Review of Post-Cleanup Conditions

Ecology will conduct periodic reviews of post-cleanup conditions at the Site to ensure that they remain protective of human health and the environment. If Ecology determines, based on a periodic review, that further remedial action is necessary at the Site, then Ecology will withdraw this opinion.

Listing of the Site

Based on this opinion, Ecology will remove the Site from our Confirmed and Suspected Contaminated Sites List.

Limitations of the Opinion

1. Opinion does not settle liability with the state.

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

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

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

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

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

3. State is immune from liability.

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

Enclosure A

Description and Diagrams of the Site

Site Description

The Site is located at 1517 South Tacoma Way, Tacoma, Washington. It is comprised of three tax parcels (7105000300, 7105000301, and 7105000340). The property is currently a commercial property surrounded by other industrial and commercial buildings, paved parking lots, and access roads. The Site is bounded to the south by South Tacoma Way and Interstate 5, to the east, north, and west by Simco Distributing, Coast Home Improvement, US Sheet Metal, Garbar Electric, and Ply-trim West.

Records indicate that there was a historic gas station adjacent to the subject Site. A 1,700-gallon underground storage tank (UST) used to store bunker-C oil and a 500-gallon UST used to store heating oil were at the Site and were removed in 1992.

Quaternary Vashon Steilacoom gravel deposits are the geological strata in this area. These deposits consist of sandy gravels with cobbles. Boring logs at the Site indicated that brown gravelly sand to depths of at least 40 feet. Groundwater was encountered between 28 and 34 feet below ground surface (bgs). The groundwater table is very flat at the Site and does not show a clear flow direction.



Figure 2 Soil Boring locations at former gas station (B1, B2, and B4) and at suspected underground storage tank location (B3) during Site Investigation Event 1 conducted on September 12, 2012. B3 detected TPH-Dx exceeding MTCA Method A cleanup level.

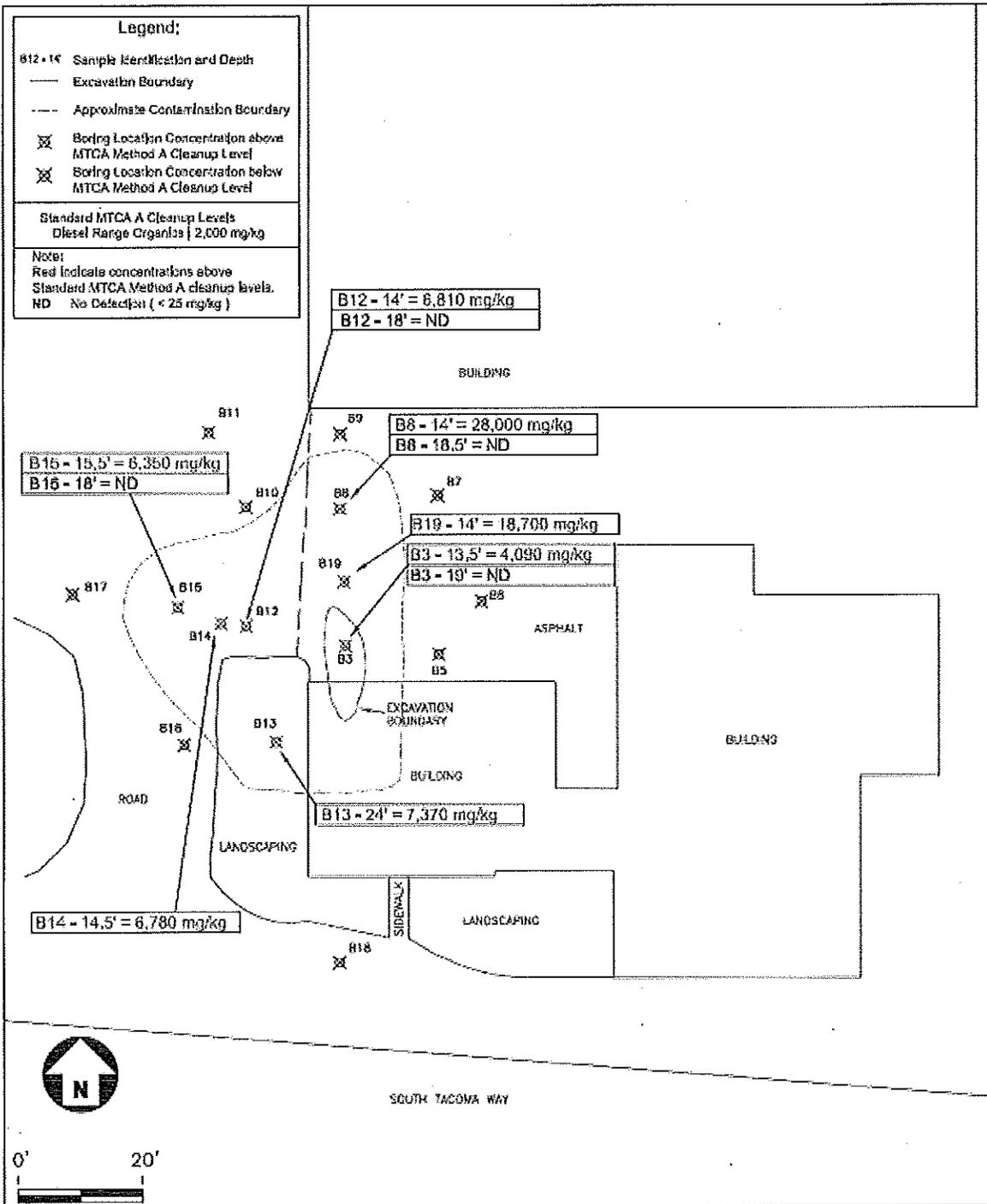


Figure 4: Supplemental Site investigation during Event 3 & 4 in November and December of 2012 delineated the lateral boundary of soil contamination plume. Vertical extent remains undefined at southwest corner where B13 is located.

Enclosure B

Environmental Covenant for Founder's Choice Site

201401300510 RCAROVA 10 PGS
01/30/2014 01:46:31 PM \$81.00
AUDITOR, Pierce County, WASHINGTON

RECEIVED

FEB 04 2014
WA State Department
of Ecology (SWRO)

Name & Return Address:

Washington Dept of Ecology
PO Box 47775
Olympia, WA 98504

Please print legibly or type information.

Document Title(s)	Environmental Covenant
Grantor(s)	David E. Sizemore
____ Additional Names on Page ____ of Document	
Grantee(s)	State of Washington, Department of Ecology
____ Additional Names on Page ____ of Document	
Legal Description (Abbreviated: i.e., lot, block & subdivision name or number OR section/township/range and quarter/quarter section)	Section 08 Township 20 Range 03 Quarter 31
Complete Legal Description on Page	7 of Document
Auditor's Reference Number(s)	
Assessor's Property Tax Parcel/Account Number(s)	7105000340
<p>The Auditor/Recorder will rely on the information provided on this cover sheet. The Staff will not read the document to verify the accuracy or completeness of the indexing information provided herein.</p> <p>I am requesting an emergency nonstandard recording for an additional fee as provided in RCW 36.18.010. I understand that the recording processing requirements may cover up or otherwise obscure some part of the text of the original document.</p>	
<p>_____ Signature of Requesting Party (Required for non-standard recordings only)</p> <p>Gpcovst.doc rev 4/02</p>	

e. This Covenant grants the Washington State Department of Ecology, as holder of this Covenant, certain rights specified in this Covenant. The right of the Washington State Department of Ecology as a holder is not an ownership interest under MTCA, Chapter 70.105D RCW or the Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA") 42 USC Chapter 103.

COVENANT

David E Sizemore, as Grantor and fee simple owner of the Property hereby grants to the Washington State Department of Ecology, and its successors and assignees, (hereafter "Ecology") the following covenants. Furthermore, it is the intent of the Grantor that such covenants shall run with the land and be binding on all current and future owners of any portion of, or interest in, the Property.

Section 1. General Restrictions and Requirements.

The following general restrictions and requirements shall apply to the Property:

- a. **Interference with Remedial Action.** The Grantor shall not engage in any activity on the Property that may impact or interfere with the remedial action and any operation, maintenance, inspection or monitoring of that remedial action without prior written approval from Ecology.
- b. **Protection of Human Health and the Environment.** The Grantor shall not engage in any activity on the Property that may threaten continued protection of human health or the environment without prior written approval from Ecology. This includes, but is not limited to, any activity that results in the release of residual contamination that was contained as a part of the remedial action or that exacerbates or creates a new exposure to residual contamination remaining on the Property.
- c. **Continued Compliance Required.** Grantor shall not convey any interest in any portion of the Property without providing for the continued adequate and complete operation, maintenance and monitoring of remedial actions and continued compliance with this Covenant.
- d. **Leases.** Grantor shall restrict any lease for any portion of the Property to uses and activities consistent with this Covenant and notify all lessees of the restrictions on the use of the Property.
- e. **Amendment to the Covenant.** Grantor must notify and obtain approval from Ecology at least sixty (60) days in advance of any proposed activity or use of the Property in a manner that is inconsistent with this Covenant. Before approving any proposal, Ecology must issue a public notice and provide an opportunity for the public to comment on the proposal. If Ecology approves the proposal, the Covenant will be amended to reflect the change.

Section 2. Specific Prohibitions and Requirements.

In addition to the general restrictions in Section 1 of this Covenant, the following additional specific restrictions and requirements shall apply to the Property.

The remedial action for the Property is based on containing contaminated soil under a cap consisting of existing building structure and asphalt-paved surface located as illustrated in **Exhibit B**. The primary purpose of this cap is to reduce the infiltration of precipitation and leaching of contaminant into groundwater, and to prevent creating direct human contact pathway. As such, the following restrictions shall apply within the area illustrated in **Exhibit B**:

b. **Reporting Violations.** Should the Grantor become aware of any violation of this Covenant, Grantor shall promptly report such violation to Ecology.

c. **Emergencies.** For any emergency or significant change in site conditions due to Acts of Nature (for example, flood, fire) resulting in a violation of this Covenant, the Grantor is authorized to respond to such an event in accordance with state and federal law. The Grantor must notify Ecology of the event and response actions planned or taken as soon as practical but no later than within 24 hours of the discovery of the event.

d. Any required written notice, approval, or communication shall be personally delivered or sent by first class mail to the following persons. Any change in this contact information shall be submitted in writing to all parties to this Covenant.

David E Sizemore 1517 South Tacoma Way Tacoma, Washington 98409 253-475-5544	Environmental Covenants Coordinator Washington State Department of Ecology Toxics Cleanup Program P.O. Box 47600 Olympia, WA 98504 – 7600 (360) 407-6000
---	---

As an alternative to providing written notice and change in contact information by mail, these documents may be provided electronically in an agreed upon format at the time of submittal.

Section 5. Modification or Termination.

a. If the conditions at the site requiring a Covenant have changed or no longer exist, then the Grantor may submit a request to Ecology that this Covenant be amended or terminated. Any amendment or termination of this Covenant must follow the procedures in Chapter 64.70 RCW and Chapter 70.105D RCW and any rules promulgated under these chapters.

b. By signing this agreement, per RCW 64.70.100, the original signatories to this agreement, other than Ecology, agree to waive all rights to sign amendments to and termination of this Covenant.

Section 6. Enforcement and Construction.

a. This Covenant is being freely and voluntarily granted by the Grantor.

b. Grantor shall provide Ecology with an original signed Covenant and proof of recording within ten (10) days of execution of this Covenant.

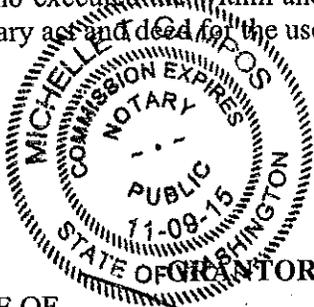
c. Ecology shall be entitled to enforce the terms of this Covenant by resort to specific performance or legal process. All remedies available in this Covenant shall be in addition to any and all remedies at law or in equity, including Chapter 70.105D RCW and Chapter 64.70 RCW. Enforcement of the terms of this Covenant shall be at the discretion of Ecology, and any forbearance, delay or omission to exercise its rights under this Covenant in the event of a breach of any term of this Covenant is not a waiver by Ecology of that term or of any subsequent breach of that term, or any other term in this Covenant, or of any rights of Ecology under this Covenant.

d. The Grantor, upon request by Ecology, shall be obligated to pay for Ecology's costs to process a request for any modification or termination of this Covenant and any approval required by this Covenant.

GRANTOR INDIVIDUAL ACKNOWLEDGMENT

STATE OF WA
COUNTY OF Pierce

On this 7 day of January, 2014 I certify that DAVID SIZEMORE personally appeared before me, and acknowledged that he is the individual described herein and who executed the within and foregoing instrument and signed the same at his free and voluntary act and deed for the uses and purposes therein mentioned.



Michelle J. Campy

Notary Public in and for the State of WA
Washington, residing at TACOMA
My appointment expires 11/9/15

GRANTOR CORPORATE ACKNOWLEDGMENT

STATE OF _____
COUNTY OF _____

On this _____ day of _____, 20____, I certify that _____ personally appeared before me, acknowledged that he/she is the _____ of the corporation that executed the within and foregoing instrument, and signed said instrument by free and voluntary act and deed of said corporation, for the uses and purposes therein mentioned, and on oath stated that he/she was authorized to execute said instrument for said corporation.

Notary Public in and for the State of
Washington, residing at _____
My appointment expires _____

Exhibit B

PROPERTY MAP-AREA SUBJECT TO RESTRICTIONS

Exhibit C

SUBORDINATION AGREEMENT

KNOW ALL PERSONS, That Commencement Bank, the owner and holder of that certain Deed of Trust (Instrument) bearing the date the 18 day of December, 20 12, executed by David Sizemore, _____, and recorded in the office of the County Auditor of Pierce County, State of Washington, on the December 19, 20 12, under Auditor's File Number 201212191422, does hereby agree that said Instrument shall be subordinate to the interest of the State of Washington, Department of Ecology, under the environmental (restrictive) covenant dated January 30, 20 14, executed by David E. Sizemore, _____, and recorded in Pierce County, Washington under Auditor's File Number 201401300510.

Dated 1/30, 20 14.

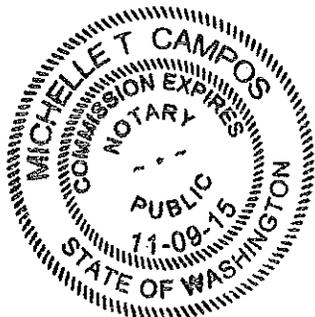
NAME

[Signature] EVF+CCO

STATE OF WA
 COUNTY OF Pierce

On this 30 day of January, 20 14, I certify that John Mandlides personally appeared before me, and acknowledged that he/she is the individual described herein and who executed the within and foregoing instrument and signed the same at his/her free and voluntary act and deed for the uses and purposes therein mentioned.

Michelle Campos
 Notary Public in and for the State of
 Washington, residing at Tacoma.
 My appointment expires 11/9/15.



Enclosure C

Founder's Choice Cabinets and Countertops Long-Term Groundwater Monitoring Plan

Founder's Choice Cabinets and Countertops (SW1292)
1517 S. Tacoma Way, Tacoma, Washington
Long-Term Groundwater Monitoring Plan
October 2013

1.0 INTRODUCTION	1
1.1 PURPOSE AND SITE IDENTIFICATION	1
1.2 REGIONAL GEOLOGY/HYDROGEOLOGY	1
2.0 BACKGROUND	1
3.0 PERIODIC MONITORING	1
3.1 SCHEDULE.....	1
3.2 METHODOLOGY.....	1
4.0 QUALITY ASSURANCE/QUALITY CONTROL (QA/QC).....	2
4.1 DAILY FIELD QA/QC	2
4.2 SAMPLE PACKAGING AND SHIPPING.....	2
4.3 CHAIN-OF-CUSTODY.....	2
4.4 LABORATORY QA/QC	2
5.0 REPORTING	2

TABLES

- TABLE 1 PROPOSED SAMPLING DATES: FIRST FIVE-YEAR INTERVAL
- TABLE 2 CONTAMINANT OF CONCERN

FIGURES

- FIGURE 1 AREAS OF RESIDUAL CONTAMINATED SOIL
- FIGURE 2 MONITOR WELL LOCATION MAP

Founder's Choice Cabinets and Countertops (SW1292)
1517 S. Tacoma Way, Tacoma, Washington
Long-Term Groundwater Monitoring Plan
October 2013

1.0 Introduction

1.1 Purpose and Site Identification

This work plan details the post-no-further-action groundwater monitoring required by the environmental covenant for Founder's Choice Cabinets and Countertops at 1517 South Tacoma Way, Tacoma, Washington. Soil contamination at the subject site is being addressed under the Washington State Department of Ecology (Ecology) voluntary cleanup program (VCP).

2.0 Background

The impacted area encompasses portions of the subject contaminated by heating oil-range hydrocarbons in soil proximal to the former location of a 500-gallon heating-oil tank removed from the site. Previous efforts have established that groundwater is not impacted. However, approximately 875 tons of impacted soils remain on site as depicted in Figure 1. Implementation of institutional controls has been selected as the most appropriate closure mechanism for this residual soil impact. These controls are specified in the environmental covenant to which this long-term monitoring plan is appended.

3.0 Periodic Monitoring

3.1 Schedule

The five existing monitoring wells (see Figure 2) will be sampled at 18-month intervals for a minimum of 5 years. The first monitoring event will occur in April 2015. Each additional sampling event will be completed every 18 months thereafter. The following table shows the anticipated month and year of the sampling events.

Table 1. Proposed sampling dates

Event *	Date
1	April 2015
2	December 2016
3	August 2017

*To reoccur on an 18-month interval unless Ecology approves a change in frequency.

After completion of the first five-year interval, Ecology will be asked to review the data and determine whether or not monitoring can be terminated.

3.2 Methodology

Prior to sampling, water levels will be sounded and the wells opened and allowed to stabilize. Water levels from the three wells will be used to calculate the groundwater gradient which will be presented in the monitoring reports.

A peristaltic pump and dedicated tubing will be used to sample each well. Samples will be collected after at least three volumes of water are purged from the wells and field measurements of temperature, conductivity, total dissolved solids, and dissolved oxygen stabilize (within measurement error limits).

Water samples will be placed into laboratory-supplied, pre-cleaned containers with proper preservatives for delivery to an accredited laboratory. The samples will be transferred to in a laboratory-supplied, thick-walled cooler containing blue ice. The samples will then be delivered to Libby Environmental, Inc. of Olympia, Washington. The samples will be analyzed using Ecology NWTPH-Dx for heating-oil (diesel) range petroleum hydrocarbons.

Table 2. Contaminant of concern

Analyte	MTCA Method A Cleanup Levels (µg/L)
Diesel	500

4.0 Quality Assurance/Quality Control (QA/QC)

4.1 Daily Field QA/QC

The project manager will review documentation including sample logs, custody forms, and field logs prior to samples being delivered to the laboratory. Review will be done for completeness, accuracy, and consistency.

4.2 Sample Packaging and Shipping

The groundwater samples collected for chemical analysis will be kept out of direct sunlight and checked for label completeness and cap tightness. All samples submitted to the laboratory shall be thermally preserved in the field (four degrees Celsius) immediately after sample collection by placing them upright in a pre-cooled, insulated ice chest containing uncontaminated blue ice[®]. Only coolers constructed of plastic or fiberglass standard to those provided by environmental analytic laboratories will be used. The coolers will not have drains.

4.3 Chain-of-Custody

A chain-of-custody form will accompany samples submitted to the laboratory.

4.4 Laboratory QA/QC

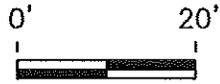
A narrative regarding quality assurance and quality control will be provided with the laboratory analysis reports. This narrative will indicate whether or not quality control is within acceptable limits.

5.0 Reporting

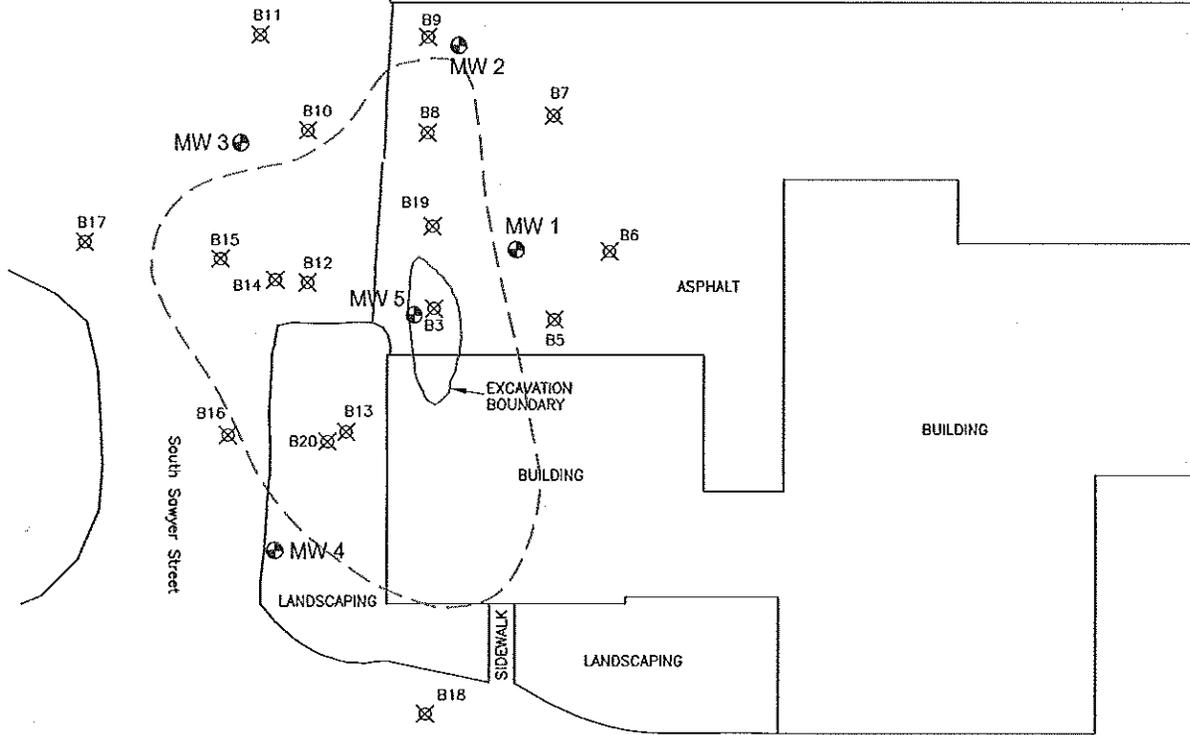
Each monitoring event will be documented in a report that will be submitted to Ecology. The report will document the collection and analysis of the samples, present the analytical data, and comment on the quality assurance and quality control for the project. The reports will include interpretation of the data and include any recommendations that the data may warrant.

Legend:

-  Monitoring Well Location
-  Boring Location
-  Plume Boundary
-  Excavation Boundary



BUILDING



SOUTH TACOMA WAY



**ROBINSON
NOBLE**

PM: JFH
Oct. 2013
2754-001D

Pierce County
T 20 N/R 03 E - 08
Scale 1" = 20'

Long-Term Groundwater Monitoring Plan Figure 2

Monitoring Well Location Map

Founder's Choice: GW Characterization & Remedial Feas. Study