



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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

✓ SIP
- Not in
DSARS

September 25, 2014

Mr. Rob Rice
Rob Rice Homes
1868 State Avenue NE
Olympia, WA 98506

Re: No Further Action at a Property associated with the Asarco Tacoma Smelter Site:

- Name: Meridian Campus – Campus Fairways
- Property Address: Intersection of Campus Park Drive NE and Meridian Rd NE, Parcel #11936110000
- Facility/Site No.: 7370
- Cleanup Site ID: 12416
- VCP Project No.: SW1410

Dear Mr. Rice:

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

Issues Presented and Opinion

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

NO. Ecology has determined that no further remedial action is necessary at the Property to clean up contamination associated with the Site.

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

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

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



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Description of the Property and the Site

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

1. Description of the Property.

The Property includes the following tax parcels in Thurston County that were affected by the Site and addressed by your cleanup:

38450000001	38450000700	38450002600	38450004500	38450006400
38450000002	38450000800	38450002700	38450004600	38450006500
38450000003	38450000900	38450002800	38450004700	38450006600
38450000004	38450001000	38450002900	38450004800	38450006700
38450000005	38450001100	38450003000	38450004900	38450006800
38450000006	38450001200	38450003100	38450005000	38450006900
38450000007	38450001300	38450003200	38450005100	38450007000
38450000008	38450001400	38450003300	38450005200	38450007100
38450000009	38450001500	38450003400	38450005300	38450007200
38450000010	38450001600	38450003500	38450005400	38450007300
38450000011	38450001700	38450003600	38450005500	38450007400
38450000012	38450001800	38450003700	38450005600	38450007500
38450000013	38450001900	38450003800	38450005700	38450007600
38450000100	38450002000	38450003900	38450005800	38450007700
38450000200	38450002100	38450004000	38450005900	38450007800
38450000300	38450002200	38450004100	38450006000	38450007900
38450000400	38450002300	38450004200	38450006100	
38450000500	38450002400	38450004300	38450006200	
38450000600	38450002500	38450004400	38450006300	

Enclosure A includes a legal description of the Property and details of the Property as currently known to Ecology. This opinion letter covers all the lots listed above that were created from parcel #11936110000.

2. Description of the Site.

The Site is defined by the nature and extent of contamination associated with the following releases:

- Arsenic into the Soil.
- Lead into the Soil.

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

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

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

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

Basis for the Opinion

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

- 1) Landau Associates, No Further Action Request Report - Campus Fairways - Meridian Campus Development, dated June 24, 2014.
- 2) City of Lacey, Approved Grading Plans for Campus Fairways, dated July 26, 2013.
- 3) Landau Associates, Cleanup Action Plan and Site Characterization Meridian Campus Development, dated June 16, 2005.
- 4) Landau Associates, Draft Sampling and Analysis Plan Meridian Campus Development, dated February 4, 2005.

Those documents are kept in the Central Files of the Southwest Regional Office of Ecology (SWRO) for review by appointment only. You can make an appointment by calling the SWRO resource contact at (360) 407-6365.

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

Analysis of the Cleanup

1. Cleanup of the Property located within the Site.

Ecology has concluded that **no further remedial action** is necessary at the Property to clean up contamination associated with the Site. That conclusion is based on the following analysis:

a. Characterization of the Site.

The Site is described in Enclosure B.

For almost 100 years, the Asarco Company operated a copper smelter in Tacoma, Washington. Air pollution from the smelter settled on the surface soil over a vast region -- more than 1,000 square miles of the Puget Sound basin. Arsenic, lead, and other heavy metals are still in the soil as a result of this pollution. Ecology has found elevated levels of arsenic and lead as far south as Lacey and as far north as Seattle (West Seattle), and as far west as the Kitsap Peninsula and as far east as Kent and Bellevue.

Campus Fairways is part of the 1,540-acre Meridian Campus Development in Lacey, Washington. See Enclosure A and Figures 1, 2, 3, and 4 for more information about the Property. The Property is approximately 22 acres.

Two of a total of 50 samples were taken from Campus Fairways during the March 2005 characterization of the Meridian Campus Development. Arsenic levels ranged from 12.6 to 16.5 milligrams per kilogram (mg/kg) and lead ranged from 26 to 43 mg/kg. All levels from Campus Fairways were below MTCA Method A cleanup levels. Of the 50 total samples from throughout Meridian Campus, 18 were above cleanup levels for arsenic.

b. Establishment of cleanup standards for the Site.

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

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

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

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

- Average arsenic concentration detected in the soil less than 20 mg/kg.
- Average lead concentration detected in the soil less than 250 mg/kg.

OR

- No single soil sample has arsenic concentration above 40 mg/kg.
- No single soil sample has lead concentration above 500 mg/kg.

c. Selection of cleanup for the Property.

In June 2005, Landau Associates developed a Cleanup Action Plan (CAP) for the entire Meridian Campus Development. The cleanup action plan described soil mixing done through development grading activities as a way to remediate Tacoma Smelter Plume contamination. Ecology issued an opinion letter for the cleanup action plan in 2006. This letter described the number of compliance samples that should be collected to obtain a No Further Action letter.

Ecology has determined the cleanup selected for the Property meets the substantive requirements of MTCA and the IAP. The cleanup meets the minimum cleanup requirements and does not exacerbate conditions or preclude reasonable cleanup alternatives elsewhere at the Site.

d. Cleanup of the Property.

Ecology has determined the cleanup you performed meets the applicable Site cleanup standards within the Property.

The contractor scraped, mixed, and stockpiled the upper soil layer at Campus Fairways.

Stockpile sampling: Landau Associates sampled the stockpiled soils in accordance with the 2005 Sampling and Analysis Plan for Meridian Campus. The stockpile was visually divided into 20 sections in a grid. Four discrete samples were taken from each grid section, from 2-18 inches in depth, and then composited. Based on the analytical results, the stockpiled soil will be used as topsoil to support hydroseeding for erosion control within areas of the development.

- Arsenic levels ranging from 7.6 to 15 mg/kg.
- Lead levels ranging from 11 to 16 mg/kg.

Final confirmational sampling: On January 27, 2014, Landau Associates took 52 confirmational samples from the top 6 inches of soil after grading, in accordance with the 2005 Sampling and Analysis Plan for Meridian Campus as modified to comply with recommendations in Ecology's opinion letter (Ecology 2006) regarding the CAP. Final at-grade confirmational sampling was conducted at a stormwater facility associated with Campus Fairways. Two soil samples were collected from the proposed stormwater facility on October 10, 2013. All the final 52 at-grade confirmation sample results indicate arsenic and lead concentrations were below the respective MTCA Method A soil cleanup levels for unrestricted land use.

- Arsenic levels ranging from non-detect to 12 mg/kg.
- Lead levels ranging from 2 to 19 mg/kg.

The final analytical results for the two at-grade confirmational samples within the stormwater cell also indicate arsenic and lead levels below MTCA Method A soil cleanup for unrestricted land use.

- Arsenic levels were below the laboratory reporting limit.
- Lead levels ranging from 1.8 mg/kg to 2.0 mg/kg.

2. Cleanup of the Site as a whole.

Ecology has concluded that **further remedial action** under MTCA is still necessary elsewhere at the Site. In other words, while your cleanup constitutes the final action for the Property, it is only an **“interim action”** for the Site as a whole.

Listing of the Site

Based on this opinion, Ecology will update the status of remedial action at the Site on our database of hazardous waste sites. However, because further remedial action is still necessary elsewhere at the Asarco Tacoma Smelter Site, we will not remove the Site from our lists of hazardous waste sites. Furthermore, the Property will remain listed as part of the Site because the cleanup of the Property does not change the boundaries of the Site.

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 Property. This opinion **does not**:

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

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

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 proposed will be 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).

Termination of Agreement

Thank you for cleaning up your Property under the Voluntary Cleanup Program (VCP). This opinion terminates the VCP Agreement governing this project (#SW1410).

For more information about the VCP and the cleanup process, please visit our web site: www.ecy.wa.gov/programs/tcp/vcp/vcpmain.htm. If you have any questions about this opinion or the termination of the Agreement, please contact me by phone at 360-407-6257 or by e-mail at Eva.Barber@ecy.wa.gov.

Sincerely,



Eva L. Barber
SWRO Toxics Cleanup Program

ELB/ksc:SW1410 Campus Fairways NFA

Enclosures: Enclosure A: Legal Description, addresses, and general description of the Property
 Enclosure B: Site description of Asarco Tacoma Smelter Site
 Figure 1: Vicinity Map of Meridian Campus – Campus Fairways
 Figure 2: Meridian Campus Master Plan
 Figure 3: Campus Fairways Lot Map
 Figure 4: Compliance Sampling
 Table 1: Stockpile Sample Results – Campus Fairways
 Table 2: Soil Confirmation Sample Results – Campus Fairways

By certified mail: (91 7199 9991 7030 1778 5877

cc: Christine Kimmel; Landau Associates, Inc.
 Rick Walk; City of Lacey Community Development
 Samra Seymour; City of Lacey Community Development
 Gerald Tousley; Thurston County Public Health
 Scott Rose – Ecology
 Dolores Mitchell – Ecology

Enclosure A

Legal Description of the Property

THAT PORTION OF PARCEL "B" OF SURVEY FOR LARGE LOT SEGREGATION RECORDED NOVEMBER 4, 2010 UNDER AUDITOR'S FILE NO. 4179893 DESCRIBED AS FOLLOWS:
BEGINNING AT A POINT ON THE BOUNDARY BETWEEN SAID PARCEL "B" AND THE HAWKS PRAIRIE GOLF COURSE, AS DESCRIBED IN DEED RECORDED UNDER AUDITOR'S FILE NO. 3363606, RECORDS OF THURSTON COUNTY, WASHINGTON A DISTANCE OF 897.82 FEET NORTH 87° 34' 38" WEST OF A POINT ON THE EAST LINE OF THE NORTHEAST QUARTER OF SECTION 36, TOWNSHIP 19 NORTH, RANGE 1 WEST W.M., A DISTANCE OF 2021.05 FEET SOUTH 02° 25' 22" WEST OF THE NORTHEAST CORNER THEREOF; THENCE NORTH 42° 01' 48" EAST ALONG SAID BOUNDARY 189.08 FEET AND NORTH 72° 21' 08" EAST 228.22 FEET AND NORTH 14° 09' 08" EAST 742.21 FEET AND NORTH 24° 24' 19" WEST 447.84 FEET AND NORTH 00° 11' 14" EAST 104.83 FEET TO THE BEGINNING OF A NON-TANGENT CURVE TO THE LEFT, THE RADIUS POINT OF WHICH BEARS NORTH 22° 51' 11" WEST 202.00 FEET; THENCE NORTHEASTERLY ALONG SAID CURVE AND BOUNDARY THROUGH A CENTRAL ANGLE OF 24° 14' 55" AN ARC LENGTH OF 85.49 FEET TO THE BEGINNING OF A TANGENT CURVE TO THE RIGHT, THE RADIUS POINT OF WHICH BEARS SOUTH 47° 06' 06" EAST 148.00 FEET; THENCE NORTHEASTERLY ALONG SAID CURVE AND BOUNDARY THROUGH A CENTRAL ANGLE OF 27° 15' 43" AN ARC LENGTH OF 70.42 FEET; THENCE NORTH 10° 40' 27" WEST ALONG SAID BOUNDARY 71.79 FEET AND NORTH 86° 51' 03" WEST 142.91 FEET AND NORTH 65° 48' 45" WEST 137.55 FEET AND NORTH 87° 18' 25" WEST 226.90 FEET AND SOUTH 82° 18' 53" WEST 172.77 FEET AND NORTH 39° 42' 31" WEST 122.85 FEET AND SOUTH 44° 58' 45" WEST 101.99 FEET AND SOUTH 47° 01' 18" EAST 113.98 FEET AND SOUTH 22° 09' 02" EAST 470.63 FEET AND SOUTH 17° 41' 23" EAST 335.59 FEET AND SOUTH 18° 03' 16" WEST 635.57 FEET AND SOUTH 03° 28' 27" WEST 272.84 FEET AND SOUTH 54° 05' 34" WEST 144.92 FEET AND NORTH 86° 47' 33" WEST 126.84 FEET; THENCE SOUTH 37° 17' 38" WEST 34.28 FEET TO A POINT ON THE NORTHEASTERLY RIGHT OF WAY OF CAMPUS PARK DRIVE NE, ACCORDING TO THE PLAT OF CAMPUS HIGHLANDS DIVISION 5, AS RECORDED AUGUST 27, 2010 UNDER AUDITOR'S FILE NO. 4167383, RECORDS OF SAID COUNTY, SAID POINT BEING THE BEGINNING OF A NON-TANGENT CURVE TO THE RIGHT, THE RADIUS POINT OF WHICH BEARS SOUTH 37° 17' 38" WEST 205.00 FEET; THENCE SOUTHEASTERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 38° 16' 34" AN ARC LENGTH OF 136.95 FEET; THENCE CONTINUING ALONG SAID NORTHEASTERLY RIGHT OF WAY SOUTH 14° 27' 14" EAST 230.13 FEET TO A POINT ON SAID GOLF COURSE BOUNDARY; THENCE NORTH 35° 55' 48" EAST ALONG SAID BOUNDARY 588.08 FEET TO THE POINT OF BEGINNING, ALSO THAT PORTION OF SAID PARCEL "B" LYING NORTHERLY OF CAMPUS HIGHLANDS DRIVE, NE, AS DESCRIBED IN DEDICATION DEED TO THE CITY OF

LACEY RECORDED MAY 5, 2014 UNDER AUDITOR'S FILE NO. 4390333, RECORDS OF SAID COUNTY AND LYING SOUTHERLY OF THE FOLLOWING DESCRIBED LINE:

BEGINNING AT A POINT 796.05 FEET SOUTH 01° 42' 12" WEST OF A POINT ON THE NORTH LINE OF THE NORTHEAST QUARTER OF SAID SECTION 36, A DISTANCE OF 175.51 FEET SOUTH 88° 17' 48" EAST OF THE NORTHWEST CORNER THEREOF; THENCE SOUTH 15° 53' 10" WEST 22.70 FEET TO THE BEGINNING OF A NON-TANGENT CURVE TO THE RIGHT, THE RADIUS POINT OF WHICH BEARS SOUTH 64° 38' 38" EAST 173.00 FEET; THENCE NORTHEASTERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 41° 09' 36" AN ARC LENGTH OF 124.28 FEET; THENCE NORTH 66° 30' 58" EAST 218.78 FEET TO THE BEGINNING OF A TANGENT CURVE TO THE RIGHT HAVING A RADIUS OF 168.00 FEET; THENCE EASTERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 28° 52' 48" AN ARC LENGTH OF 84.68 FEET; THENCE SOUTH 84° 36' 14" EAST 60.68 FEET TO THE BEGINNING OF A TANGENT CURVE TO THE RIGHT HAVING A RADIUS OF 168.00 FEET; THENCE EASTERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 22° 45' 49" AN ARC LENGTH OF 66.75 FEET; THENCE SOUTH 61° 50' 25" EAST 2.77 FEET TO THE NORTHWESTERLY RIGHT OF WAY LINE OF SAID CAMPUS HIGHLANDS DRIVE NE AND THE TERMINUS OF THIS DESCRIBED LINE.

ALSO THAT PORTION OF SAID PARCEL "B" DESCRIBED AS FOLLOWS:

BEGINNING AT A POINT 230.00 FEET SOUTH 01° 42' 12" WEST OF A POINT ON THE NORTH LINE OF THE NORTHEAST QUARTER OF SAID SECTION 36, A DISTANCE OF 879.20 FEET SOUTH 88° 17' 48" EAST OF THE NORTHWEST CORNER THEREOF; THENCE SOUTH 88° 17' 48" EAST ALONG THE BOUNDARY BETWEEN SAID PARCEL "B" AND SAID HAWKS PRAIRIE GOLF COURSE A DISTANCE OF 72.43 FEET AND SOUTH 01° 42' 21" WEST 77.06 FEET; THENCE SOUTH 08° 16' 59" EAST 64.77 FEET; THENCE SOUTH 62° 01' 13" EAST 24.33 FEET; THENCE NORTH 62° 14' 42" EAST 54.00 FEET; THENCE SOUTH 27° 45' 18" EAST 114.45 FEET TO THE BEGINNING OF A TANGENT CURVE TO THE RIGHT HAVING A RADIUS OF 427.00 FEET; THENCE SOUTHERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 26° 23' 40" AN ARC LENGTH OF 196.71 FEET; THENCE NORTH 88° 38' 22" EAST 78.51 FEET TO SAID BOUNDARY; THENCE NORTH 12° 09' 35" WEST ALONG SAID BOUNDARY 196.72 FEET AND NORTH 11° 37' 18" EAST 51.00 FEET AND NORTH 45° 02' 32" EAST 62.88 FEET AND NORTH 85° 22' 36" EAST 70.94 FEET AND NORTH 44° 58' 45" EAST 116.57 FEET AND NORTH 04° 53' 11" EAST 126.57 FEET AND NORTH 43° 12' 40" EAST 47.58 FEET; THENCE NORTH 46° 47' 20" WEST 31.57 FEET; THENCE NORTH 01° 42' 12" EAST 45.11 FEET TO THE SOUTH LINE OF THE NORTH 30.00 FEET OF SAID NORTHEAST QUARTER; THENCE NORTH 88° 17' 48" WEST ALONG SAID SOUTH LINE 511.90 FEET TO A POINT WHICH BEARS NORTH 01° 42' 12" EAST OF THE POINT OF BEGINNING; THENCE SOUTH 01° 42' 12" WEST ALONG SAID BOUNDARY 200.00 FEET TO THE POINT OF BEGINNING; EXCEPTING THEREFROM THAT PORTION DESCRIBED IN DEDICATION DEED TO THE CITY OF LACEY RECORDED MAY 5, 2014 UNDER AUDITOR'S FILE NO. 4390333 RECORDS OF SAID COUNTY.

Property Description

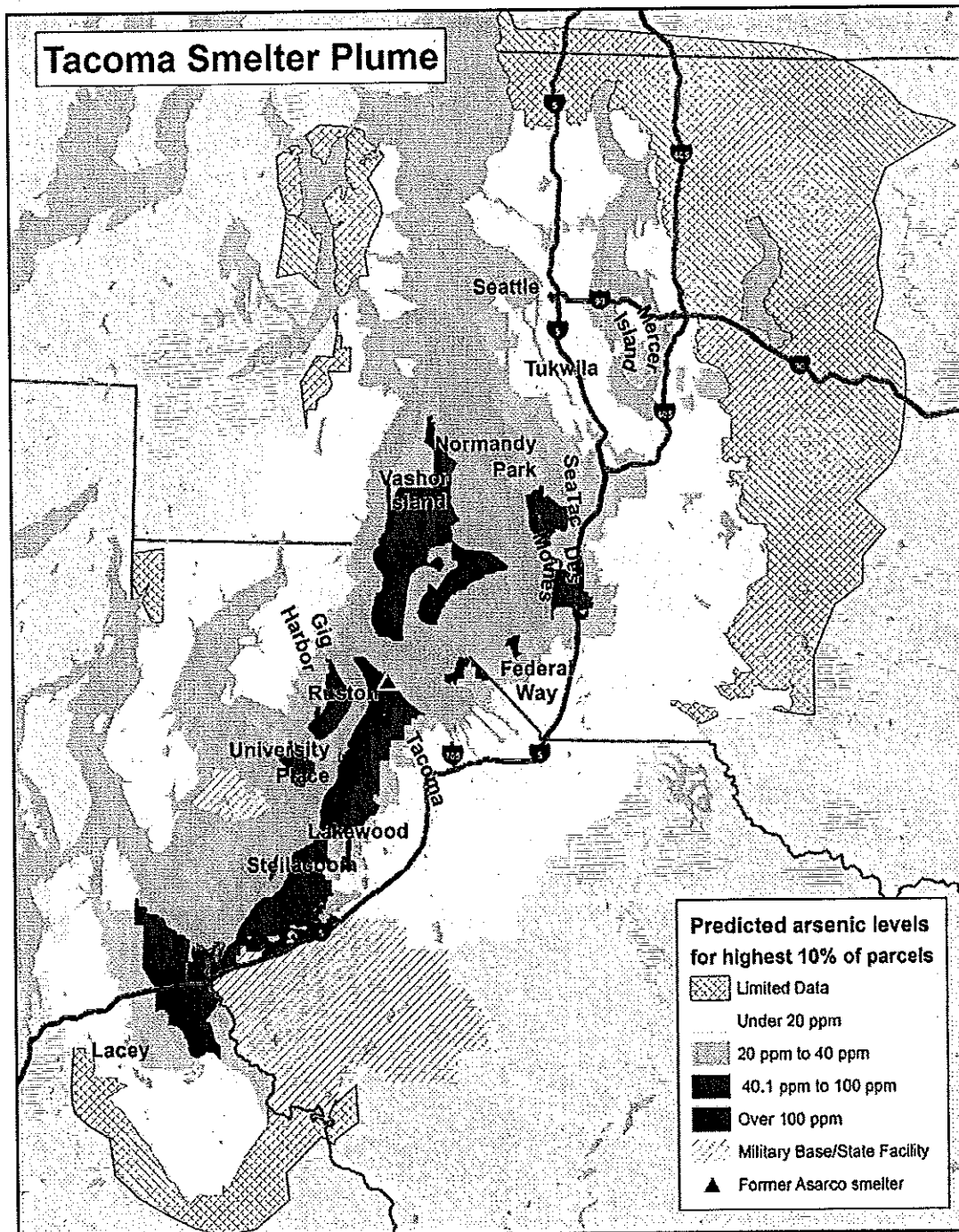
Campus Fairways (Property) (parcel #11936110000) is a tract within the Meridian Campus Development in Lacey Washington. The 22-acre Property is located within the northeast quarter of Section 36, Township 19 North, Range 1 West in Lacey, Washington. It consists of a tract of land slated for residential housing development and one stormwater facility.

The Property is in an upland area with mildly undulating topography west of the Nisqually Delta. The elevation of the land ranges from around 220 to 275 feet (ft), mean sea level (MSL). The upland area is underlain by recessional outwash deposits and glacial till. The upper soil layer was mapped as Alderwood gravelly sandy loam that is up to 40-inches thick overlying glacial till.

The uppermost aquifer beneath the Meridian Campus Development is the Qva aquifer. The elevation of the Qva aquifer beneath the Meridian Campus Development was estimated to be between elevations 125 ft, MSL and 150 ft, MSL -- over 100 ft below the ground surface.

Enclosure B

Asarco Tacoma Smelter Site

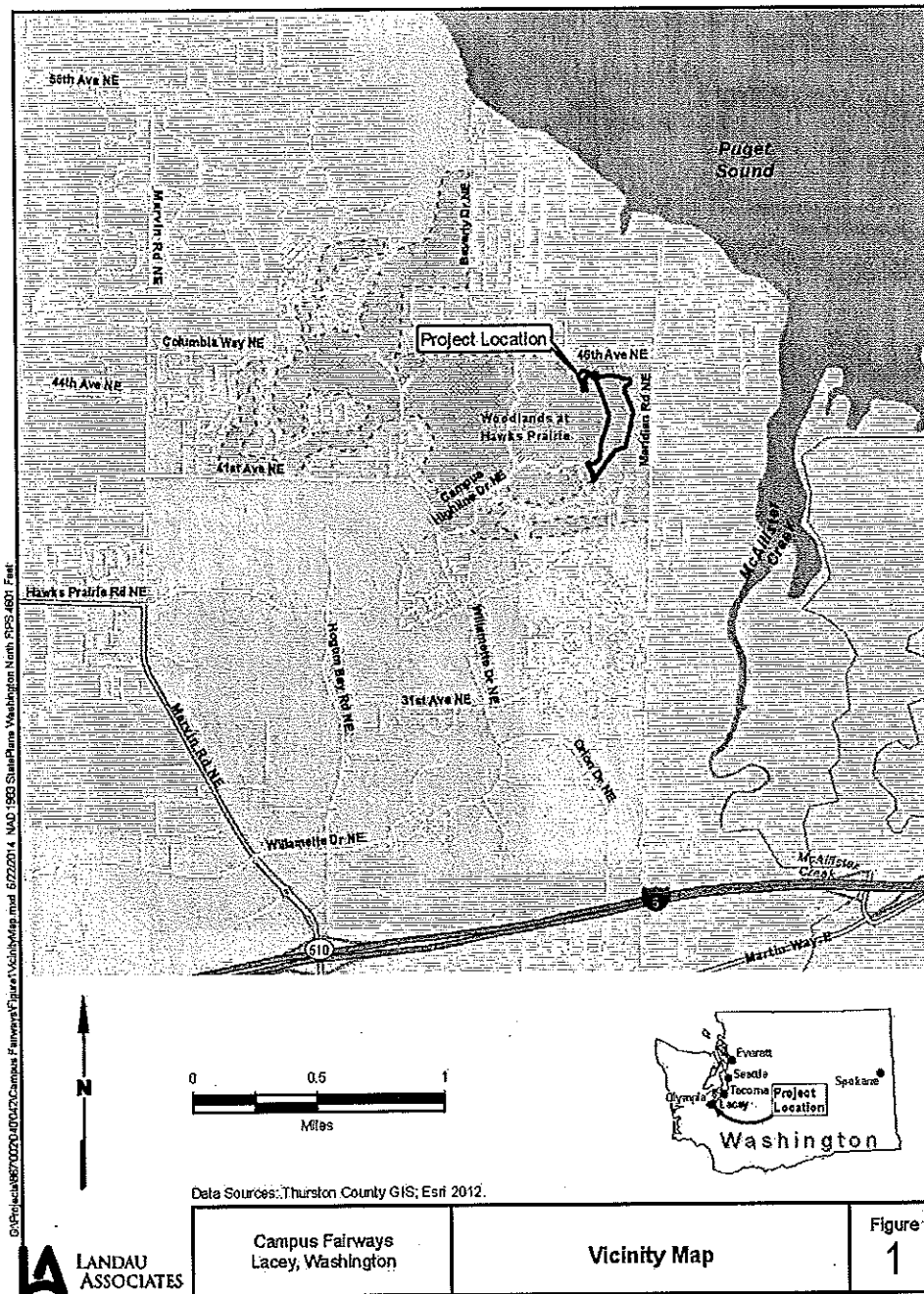


An interactive color map can be found at <https://fortress.wa.gov/ecy/smeltersearch/>

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For almost 100 years the Asarco Company operated a copper smelter in Tacoma, Washington. Air pollution from the smelter settled on the surface soil over a vast region -- more than 1,000 square miles of the Puget Sound basin. Arsenic, lead, and other heavy metals are still in the soil as a result of this pollution. Ecology has found elevated levels of arsenic and lead as far south as Lacey and as far north as Seattle (West Seattle), and as far west as the Kitsap Peninsula and as far east as Kent and Bellevue.

Figure 1. Vicinity Map



2. Meridian Campus Master Plan

Figure

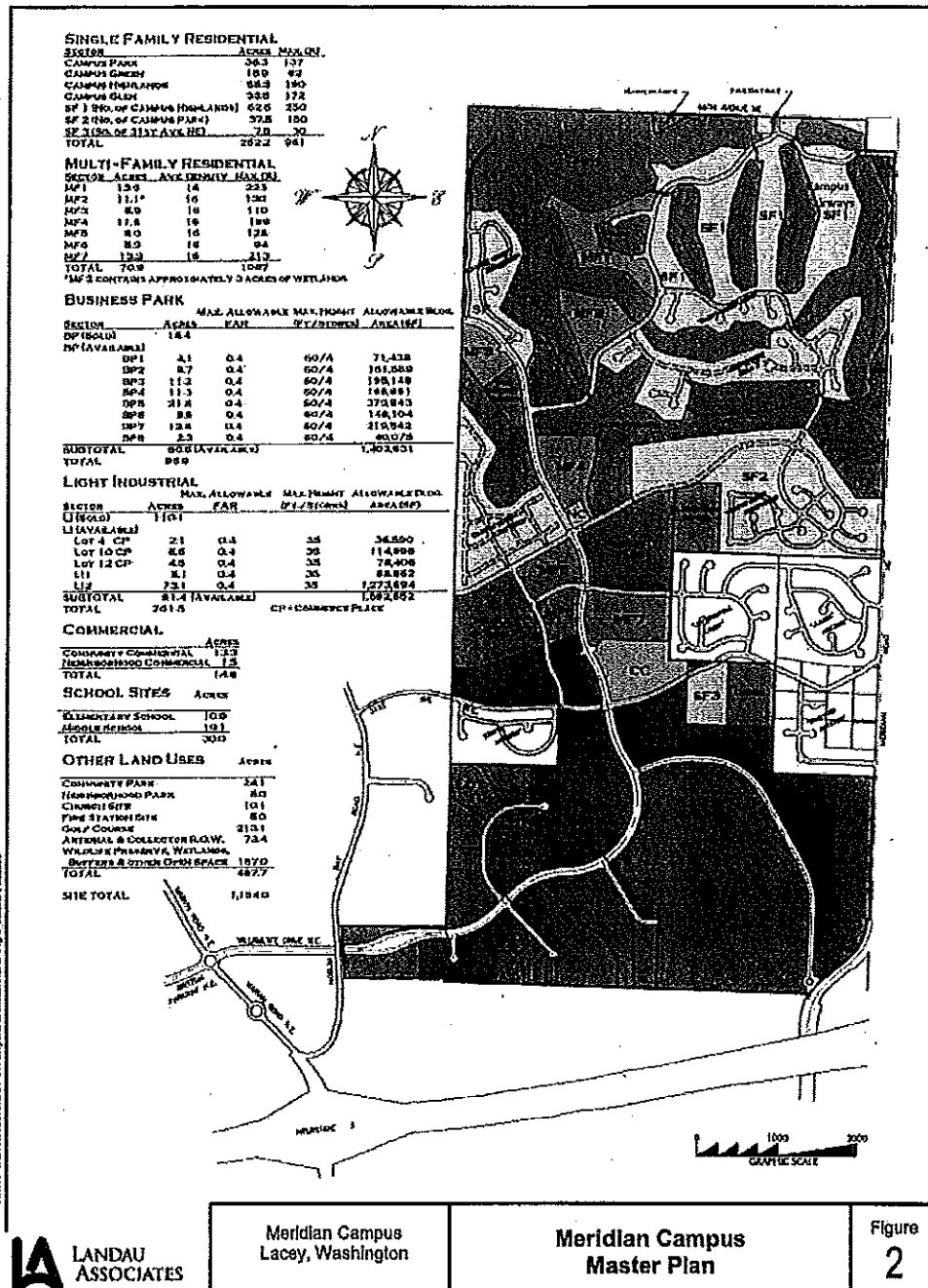


Figure 3. Lot Map

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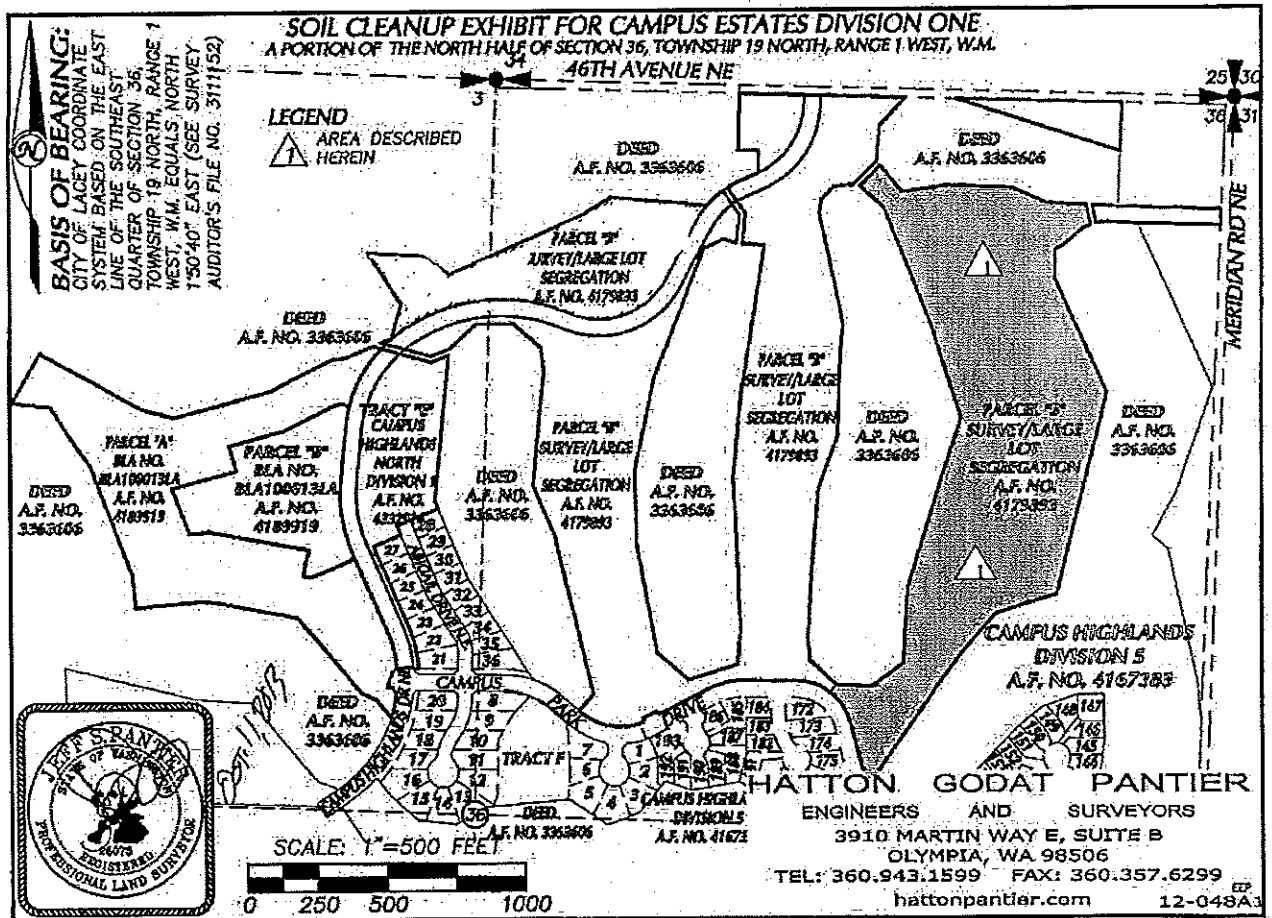


Figure 4. Compliance Sampling

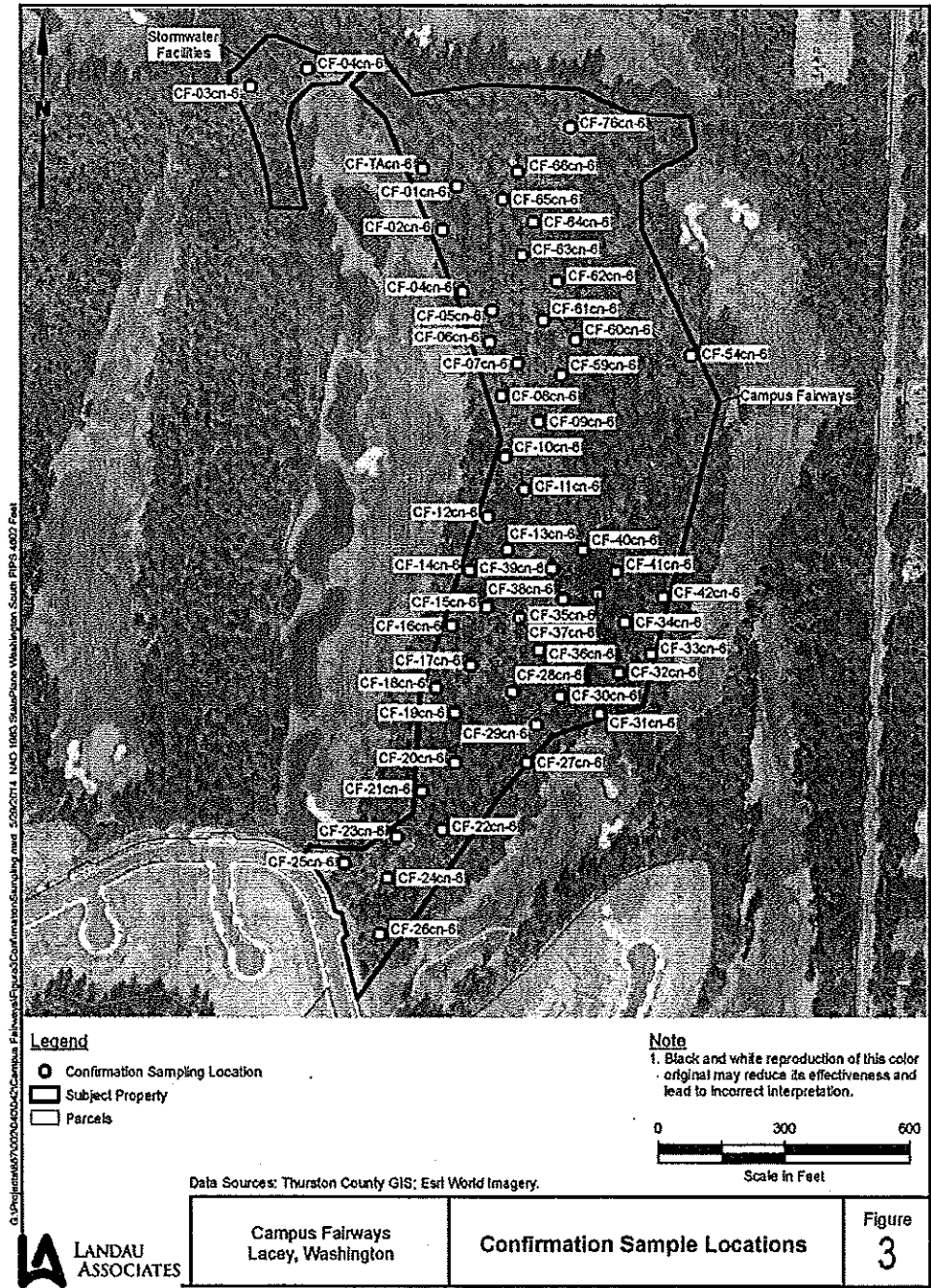


TABLE 1
STOCKPILE SAMPLING RESULTS CAMPUS FAIRWAYS

LACEY, WASHINGTON

Sample ID	Sample date	Arsenic (mg/kg)	Lead (mg/kg)
CF-SP-01-comp	9/30/2013	11	14
CF-SP-02-comp	9/30/2013	11	16
CF-SP-03-comp	9/30/2013	10	14
CF-SP-04-comp	9/30/2013	9.0	15
CF-SP-05-comp	9/30/2013	12	16
CF-SP-06-comp	9/30/2013	11	16
CF-SP-07-comp	9/30/2013	11	14
CF-SP-08-comp	9/30/2013	11	15
CF-SP-09-comp	9/30/2013	12	15
CF-SP-10-comp	9/30/2013	10	14
CF-SP-11-comp	9/30/2013	15	14
CF-SP-12-comp	9/30/2013	11	16
CF-SP-13-comp	9/30/2013	10	14
CF-SP-14-comp	9/30/2013	8.2	12
CF-SP-15-comp	9/30/2013	7.6	11
CF-SP-16-comp	9/30/2013	8.4	12
CF-SP-17-comp	9/30/2013	8.5	11
CF-SP-18-comp	9/30/2013	8.5	11
CF-SP-19-comp	9/30/2013	10	15
CF-SP-20-comp	9/30/2013	8.7	13
MTCA Method A	Cleanup Level:	20	250
	Unrestricted Use		

Mg/kg -- milligrams/kilogram

TABLE 2
SOIL SAMPLING RESULTS
CAMPUS FAIRWAYS
LACEY, WASHINGTON

Sample ID	Lab ID	Sample Date	Arsenic Method 60108 (mg/kg)	Lead Method 60108 (mg/kg)
CF-01cn-6	580-42083-15	1/27/2014	3.4	3.1
CF-02cn-6	580-42083-14	1/27/2014	4.6	6.4
CF-04cn-6	580-42083-13	1/27/2014	3.1	3.2
CF-05cn-6	580-42083-12	1/27/2014	4.2	3.7
CF-06cn-6	580-42083-11	1/27/2014	5.0	6.6
CF-07cn-6	580-42083-10	1/27/2014	3.7	3.6
CF-08cn-6	580-42083-9	1/27/2014	5.2	4.6
CF-09cn-6	580-42083-37	1/27/2014	2.9	2.8
CF-10cn-6	580-42083-38	1/27/2014	8.2	8.8
CF-11cn-6	580-42083-39	1/27/2014	2.8	2.5
CF-12cn-6	580-42083-40	1/27/2014	3.4	2.6
CF-13cn-6	580-42083-41	1/27/2014	3.0	2.4
CF-14cn-6	580-42083-42	1/27/2014	5.6	5.7
CF-15cn-6	580-42083-43	1/27/2014	3.1	3.0
CF-16cn-6	580-42083-44	1/27/2014	3.9	3.9
CF-17cn-6	580-42083-45	1/27/2014	2.9	1.9
CF-18cn-6	580-42083-46	1/27/2014	7.6	6.7
CF-19cn-6	580-42083-47	1/27/2014	4.1	3.6
CF-20cn-6	580-42083-36	1/27/2014	3.2	2.4
CF-21cn-6	580-42083-35	1/27/2014	2.8	2.2
CF-22cn-6	580-42083-34	1/27/2014	2.7	2.0
CF-23cn-6	580-42083-33	1/27/2014	3.3	2.1
CF-24cn-6	580-42083-32	1/27/2014	3.4	2.8
CF-25cn-6	580-42083-31	1/27/2014	2.8	2.4
CF-26cn-6	580-42083-30	1/27/2014	3.1	2.2
CF-27cn-6	580-42083-49	1/27/2014	2.6	2.6
CF-28cn-6	580-42083-29	1/27/2014	4.1	3.5
CF-29cn-6	580-42083-28	1/27/2014	3.6	3.2
CF-30cn-6	580-42083-27	1/27/2014	3.3	2.8
CF-31cn-6	580-42083-48	1/27/2014	3.1	3.0
CF-32cn-6	580-42083-26	1/27/2014	4.4	2.1

**TABLE 2
SOIL SAMPLING RESULTS
CAMPUS FAIRWAYS
LACEY, WASHINGTON**

Sample ID	Lab ID	Sample Date	Arsenic Method 6010B (mg/kg)	Lead Method 6010B (mg/kg)
CF-33cn-6	580-42083-25	1/27/2014	2.6	2.2
CF-34cn-6	580-42083-23	1/27/2014	3.0	2.3
CF-35cn-6	580-42083-24	1/27/2014	3.0	2.4
CF-36cn-6	580-42083-16	1/27/2014	2.6	2.2
CF-37cn-6	580-42083-17	1/27/2014	2.9	1.9
CF-38cn-6	580-42083-18	1/27/2014	2.8	2.5
CF-39cn-6	580-42083-19	1/27/2014	2.8	2.1
CF-40cn-6	580-42083-20	1/27/2014	<2.8	1.7
CF-41cn-6	580-42083-21	1/27/2014	2.4	1.7
CF-42cn-6	580-42083-22	1/27/2014	3.6	2.7
CF-54cn-6	580-43246-1	4/18/2014	4.9	6.8
CF-59cn-6	580-42083-8	1/27/2014	3.2	3.1
CF-60cn-6	580-42083-7	1/27/2014	3.2	2.8
CF-61cn-6	580-42083-6	1/27/2014	3.3	2.8
CF-62cn-6	580-42083-5	1/27/2014	2.4	1.7
CF-63cn-6	580-42083-4	1/27/2014	3.4	2.9
CF-64cn-6	580-42083-3	1/27/2014	3.0	2.4
CF-65cn-6	580-42083-2	1/27/2014	2.7	2.1
CF-68cn-6	580-42083-1	1/27/2014	5.0	2.8
CF-76cn-6	580-43246-2	4/18/2014	9.6	14.0
CF-TAcn-6	580-43246-3	4/18/2014	12.0	19.0

Samples Collected from the Additional Stormwater Facility-Campus Fairways

CF-03cn-6/CHdiv2-12cn-6 (a) 580-40868-1	10/10/13	<2.8	1.8
CF-04cn-6/CHdiv2-13cn-6 (a) 580-40868-2	10/10/13	<2.8	2.0

MTCA Method A Cleanup Level Unrestricted Use: 20 260

a) The stormwater facility was initially part of the Campus Highlands Division II area; however, the facility was later reassigned to the Campus Fairways area.

