



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: December 27, 2011

TO: Mr. Brian Dixon
SoundEarth Strategies, Inc.

RE: RAM Auto & Truck Recycling
SW1164

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: December 21, 2011

Email Customer Notification: December 27, 2011

Payment received date: February 7, 2012

EIM Data successfully uploaded: December 19, 2011

Ecology Determination letter mailed/sent: December 27, 2011



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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

December 21, 2011

Mr. Brian Dixon
SoundEarth Strategies, Inc.
2811 Fairview Ave. E, Suite 2000
Seattle, WA 98102

Re: No Further Action at the following Site:

- **Site Name:** RAM Auto & Truck Recycling
- **Site Address:** 8048 Martin Way E, Lacey
- **Facility/Site No.:** 63563665
- **VCP Project No.:** SW1164

Dear Mr. Dixon:

The Washington State Department of Ecology (Ecology) received your request for an opinion on your independent cleanup of the RAM Auto & Truck Recycling 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 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 releases:

- Petroleum hydrocarbons and related constituents into the Soil and Groundwater.
- Metals into the Soil.



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

Please note a parcel of real property can be affected by multiple sites. At this time, we have no information that the parcel(s) associated with this Site are affected by other sites.

Basis for the Opinion

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

1. Cleanup Action Report, Former RAM Auto Property, 8048 and 8106 Martin Way East, Lacey, Washington, dated November 8, 2011 by SoundEarth Strategies, Inc.
2. Phase I and Phase II Environmental Site Assessment, RAM Auto Property, 8048 and 8106 Martin Way East, Lacey, Washington, dated February 21, 2007 by Sound Environmental Strategies Corporation.

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

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

1. **Characterization of the Site.**

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 vacant. From about 1972 until 2007, an automobile wrecking and salvage yard operated on Site. Reportedly, a gasoline service station also operated on Site circa 1947. Confirmed and potential sources of contamination identified at the Site included two gasoline underground storage tanks (USTs), a waste oil aboveground storage tank (AST), hazardous building materials (such as asbestos-containing materials

and lead-based paint), and a water supply well containing a mixture of gasoline and heavy oil. In addition, soil contamination was present throughout the Site that was likely attributable to the release of vehicle fluids from various practices of the wrecking and salvage yard operation, including (but not limited to) incidental leaks and spills, storage of automotive fluids without secondary containment in some cases, and crushing of vehicles over bare soil.

In August 2007, the former RAM Auto building and associated structures were demolished. Also removed from the Site were a concrete pad associated with the building, the two gasoline USTs and associated piping, the waste oil AST, all the salvage debris, and a majority of the vegetation. Soil samples collected throughout the Site, both prior to and following clearing of the Site, were analyzed in accordance with MTCA Table 830-1 for Waste Oils. Analytical results indicated concentrations of gasoline-, diesel-, and oil-range petroleum hydrocarbons (TPH-G, TPH-D, and TPH-O), benzene, toluene, ethylbenzene, and xylene (BTEX) compounds, cadmium, and lead above MTCA Method A cleanup levels. Maximum concentrations of these contaminants included the following: TPH-G (160 milligrams per kilogram [mg/kg]), TPH-D (20,000 mg/kg), TPH-O (43,000 mg/kg), benzene (1.2 mg/kg), toluene (9.7 mg/kg), ethylbenzene (6.1 mg/kg), xylenes (45 mg/kg), cadmium (11 mg/kg), and lead (1,640 mg/kg) (*see attached Table 2 and Figures 4 and 5*). The majority of soil contamination was limited to the top 2-3 feet of soil.

A water supply well was identified behind (north of) the former RAM Auto building that was about 50 feet deep. Petroleum sheen was observed covering the piping and a petroleum odor was evident at the surface of the well casing. A sample of the liquid within the well identified TPH-G at 130,000 microgram per liter ($\mu\text{g/L}$) and TPH-O at 13,000 $\mu\text{g/L}$. Liquid within the well casing was extracted, and the well was then monitored over the next couple of months for groundwater recharge. No measurable amounts of groundwater recharged into the well. It was later determined the construction of the well was compromised and was silted up to an unknown depth. A vac truck and water was used to attempt to remove the silt by surging, but that proved unsuccessful. It was concluded the this well had no hydraulic connection to the surrounding aquifer.

In October 2007, two monitoring wells were installed on Site to 56 feet below ground surface (bgs). Groundwater was encountered at about 49 feet bgs. These wells were noted as IP01 and IP02 as they were intended to be injection points for peroxide to treat impacts to groundwater. However, no contaminants were identified in the groundwater above method detection limits. Two other wells (IP03 and IP04) were installed in September 2010, and IP05 was installed in August 2011 adjacent to the former water supply well. Groundwater data collected to date from these wells have not documented a

release to groundwater as no contaminants were detected above method detection limits during any sampling events (*see attached Table 1 and Figure 3*).

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.

MTCA Method A cleanup levels for soil and groundwater 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 soils 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 the groundwater was established throughout the Site from the uppermost level of the saturated zone extending vertically to the lowest most depth that could potentially be affected by the Site.

3. Selection of cleanup action.

Ecology has determined the cleanup action you selected for the Site meets the substantive requirements of MTCA.

Cleanup actions conducted at the Site to date have included complete source removal, excavation and off-Site disposal of contaminated soil, and some treatment of impacted soils using a biological treatment fertilizer to enhance biodegradation.

4. Cleanup.

Ecology has determined the cleanup you performed meets the cleanup standards established for the Site.

In August 2007, during building demolition, all asbestos-containing materials identified during the hazardous materials survey were removed by properly licensed and protected personnel, using appropriate work practices and engineering controls.

During the same time, the waste oil AST was evacuated of its contents and removed from the Site. The AST was stored within a 6-inch thick concrete secondary containment structure where no visible leaks or sheen were observed. Once the AST and concrete

containment were removed, no visual or olfactory signs of contamination were identified beneath the structure.

Also in August 2007, the two gasoline USTs were removed. Confirmation soil samples collected from the sidewalls and floor of the UST excavation did not contain detectable concentrations of TPH-G or BTEX compounds.

The remainder of the Site was divided into five areas (*see attached Figure 4*). Area 1 was located on the southern portion of the Site and included the footprint of the former building, shop, canopy, concrete slab, and gasoline USTs. Soil in this area was excavated to variable depths depending on the observed extent of contaminants impacts. Area 2 was located just north of Area 1 and included the waste oil AST. The soil in this area was excavated to depths of 0.5 to 4 feet bgs. Area 3 was located on the northwestern portion of the Site and included a depression filled with debris. This area was excavated to a maximum depth of 5.5 feet bgs. Area 4 was located on the northeastern portion of the Site where elevated TPH-D and TPH-O were identified. Soil in this area was excavated to a maximum depth of 4 feet bgs. Area 5 included the remaining areas of the Site where the majority of automobile staging occurred. These areas were excavated to variable depths depending on the observed extent of contaminants impacts. In all, about 1,950 tons of contaminated soil was transported off Site to Waste Management or Allied Waste of Seattle for disposal.

Numerous confirmational soil samples were collected throughout the Site in Areas 1 through 5 (*see attached Figure 5*). The majority of the samples determined that contaminants were no longer present in Site soils above MTCA cleanup levels. Three samples [C-Area5(D5)@3.0', C-Area5(D4)@4.0', and 200N050E-00] noted in Table 2 (*attached*) as Confirmation samples still contained concentrations of cadmium and/or lead above MTCA cleanup levels. However, these concentrations were less than twice the cleanup level, and these three samples constitute less than 10% of the total number of confirmation samples collection throughout the Site. As such, **it has been statistically demonstrated that Site soils have achieved compliance with MTCA cleanup standards.**

With respect to groundwater, as previously noted, contamination identified in the former water supply well did not appear to impact groundwater. Monitoring wells were installed adjacent to and in the vicinity of the former water supply well. Groundwater was encountered at about 49 feet bgs. None of the contaminants analyzed for during all monitoring events were detected above method detection limits. As such, **a release to groundwater has not been documented.**

Listing of the Site

Based on this opinion, Ecology will initiate the process of removing the Site from our lists of hazardous waste sites, including:

- Hazardous Sites List.
- Confirmed and Suspected Contaminated Sites List.
- Leaking Underground Storage Tank List.

That process includes public notice and opportunity to comment. Based on the comments received, Ecology will either remove the Site from the applicable lists or withdraw this opinion.

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).

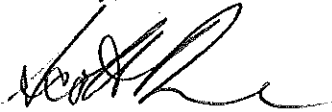
Mr. Brian Dixon
December 21, 2011
Page 7

Termination of Agreement

Thank you for cleaning up the Site under the Voluntary Cleanup Program (VCP). This opinion terminates the VCP Agreement governing this project (#SW1164).

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) 407-6347 or via email at sros461@ecy.wa.gov.

Sincerely,



Scott Rose, L.G.
Acting Unit Manager
SWRO Toxics Cleanup Program

SIR/ksc:RAM Auto Site NFA

Enclosures: A – Description and Diagrams of the Site

By certified mail: (7010 0780 0002 3403 2667)

cc: Steven R. Mongeau – Lucia Development, LLC
 Gerald Tousley – Thurston County Health
 Carol Johnston – Ecology
 Dolores Mitchell – Ecology (w/o enclosures)

Enclosure A

Description and Diagrams of the Site

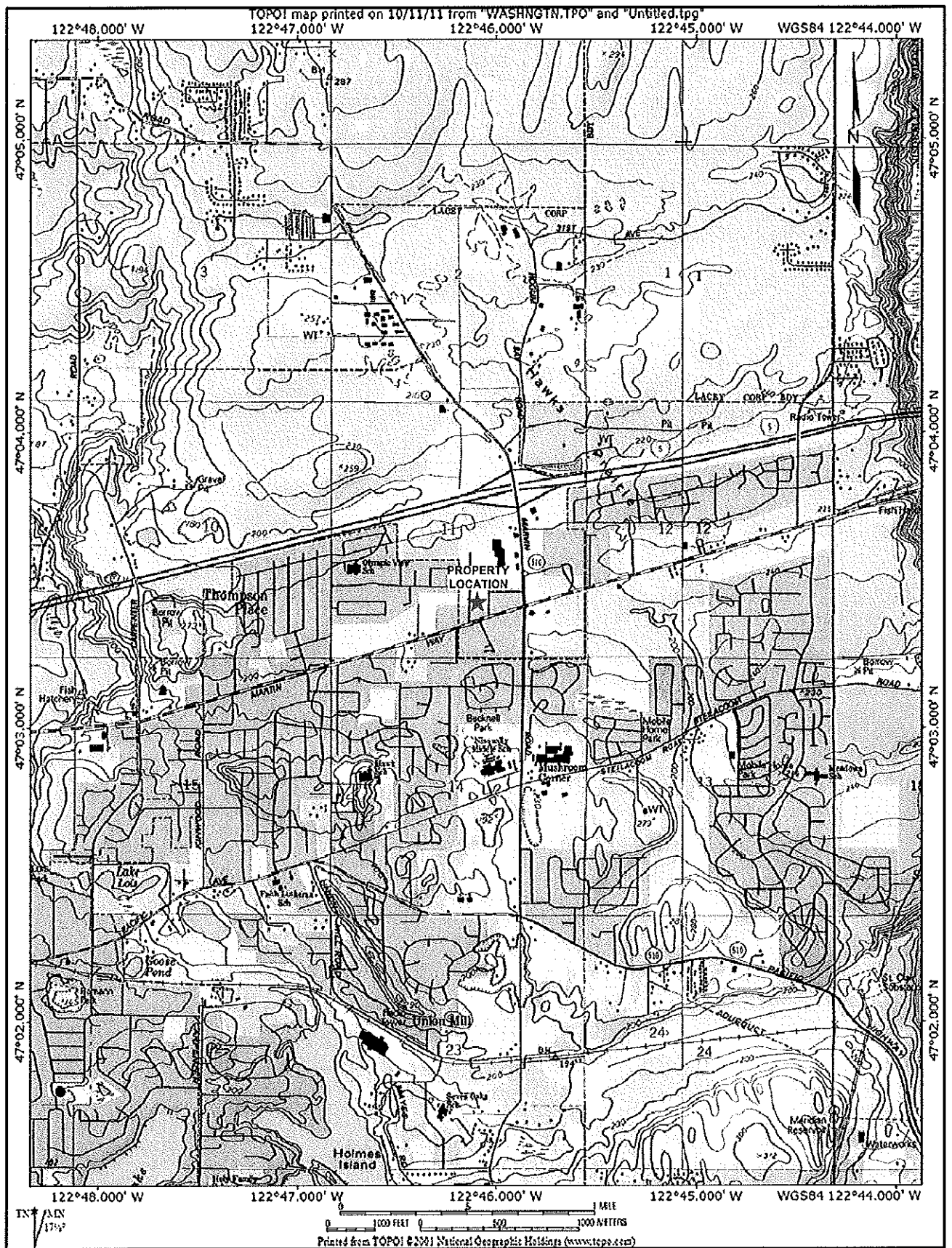
Site Description

The RAM Auto & Truck Recycling Site (Site) is located at 8048 Martin Way East in Lacey, Thurston County, Washington. The Site is comprised of two parcels (Parcel Nos. 11811430400 and 11811430500) totaling about 2.95 acres. The Site is currently vacant and is scheduled for redevelopment in 2012 as a retail shopping center. The area surrounding the Site is predominantly commercial. An LA Fitness borders the Site to the north, Martin Way East and Hawks Prairie Automotive border to the south, a Safeway retail gasoline station borders the Site to the east, and Galaxy Drive and Goodwill Industries borders the Site to the west. Reportedly, the Site was first developed in 1942 when single-family residences and a stable were present. A retail gasoline service station was noted in a 1947 aerial photograph. By 1972, the Site was used as an automobile wrecking and salvage yard. Site use remained unchanged until 2007 when the Site was sold to Lucia Development, LLC who cleared the Site of all structures and debris.

Topographically, the Site is relatively flat. Soils beneath the Site consist mainly of Vashon recessional outwash deposits. These deposits consist of moderately to poorly sorted sand and gravel. Investigation conducted at the Site encountered loose sand and coarse sediment indicative of Steilacoom Gravels to about 13 feet below ground surface (bgs). Groundwater was encountered beneath the Site at about 49 feet bgs, and generally flows to the northeast.

11/3/2011

P:\0570 RAM AUTO PH I\0570-001-05\TECHNICAL\CAD\2011\CAR\0570-001-05_2011\CAR_FIG1.DWG



SoundEarth
Strategies
WWW.SOUNDEARTHINC.COM

DATE: _____ 10/11/11
DRAWN BY: _____ JQC
CHECKED BY: _____ BAD
CAD FILE: _____ 0570-001_FIG1

PROJECT NAME: _____ FORMER RAM AUTO PROPERTY
PROJECT NUMBER: _____ 0570-001-05
STREET ADDRESS: _____ 8048 & 8106 MARTIN WAY EAST
CITY, STATE: _____ LACEY, WASHINGTON

FIGURE 1
PROPERTY LOCATION MAP

DATEPLOT/PLT

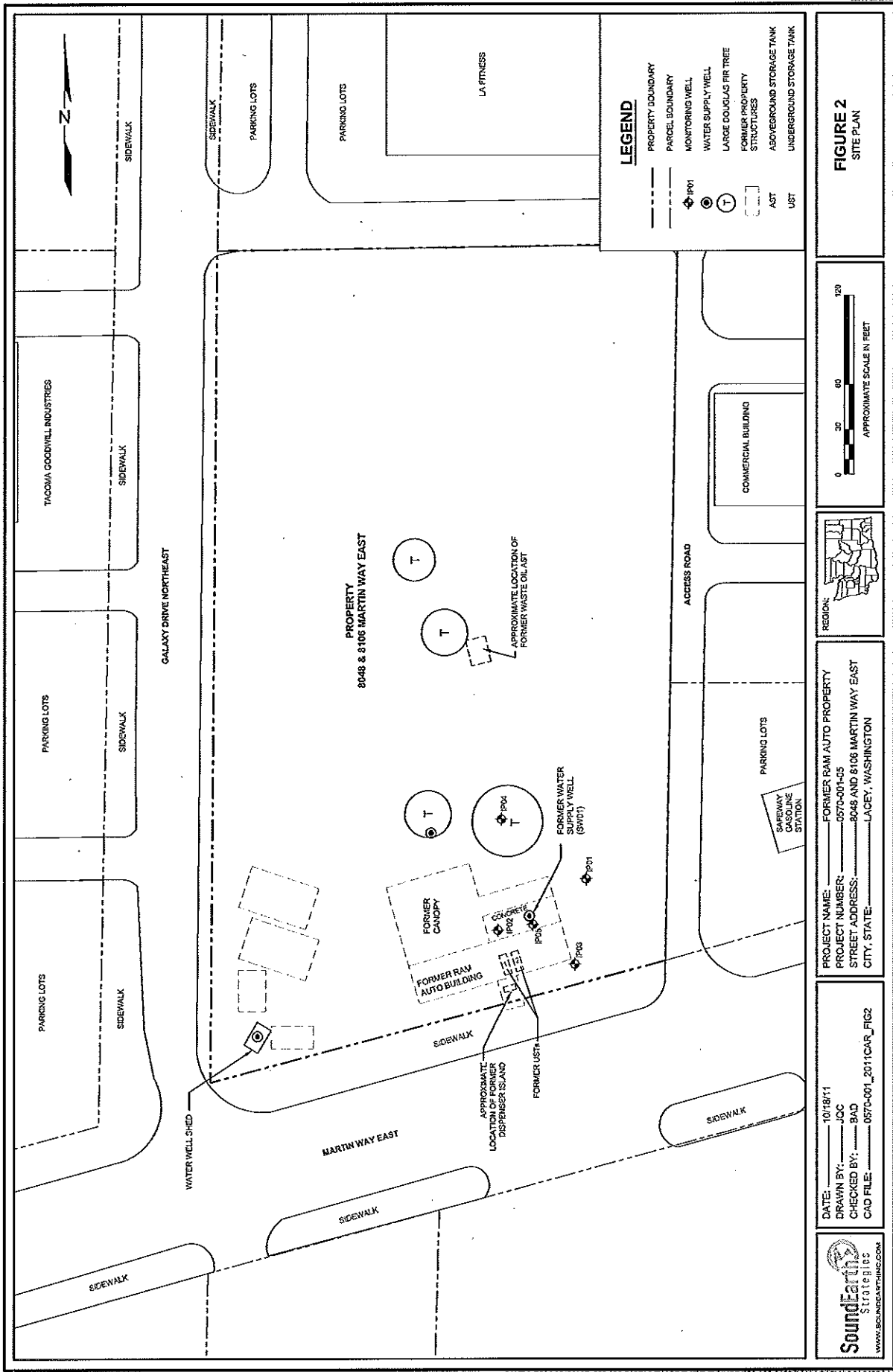
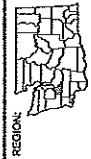
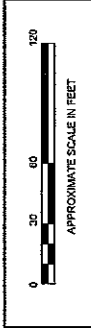


FIGURE 2
SITE PLAN



REGION: _____
 PROJECT NAME: FORMER RAM AUTO PROPERTY
 PROJECT NUMBER: 0570-001-05
 STREET ADDRESS: 8048 AND 8106 MARTIN WAY EAST
 CITY, STATE: TACOMA, WASHINGTON

DATE: 10/18/11
 DRAWN BY: JOC
 CHECKED BY: BAD
 CAD FILE: 0570-001_2011CAR_FIG2





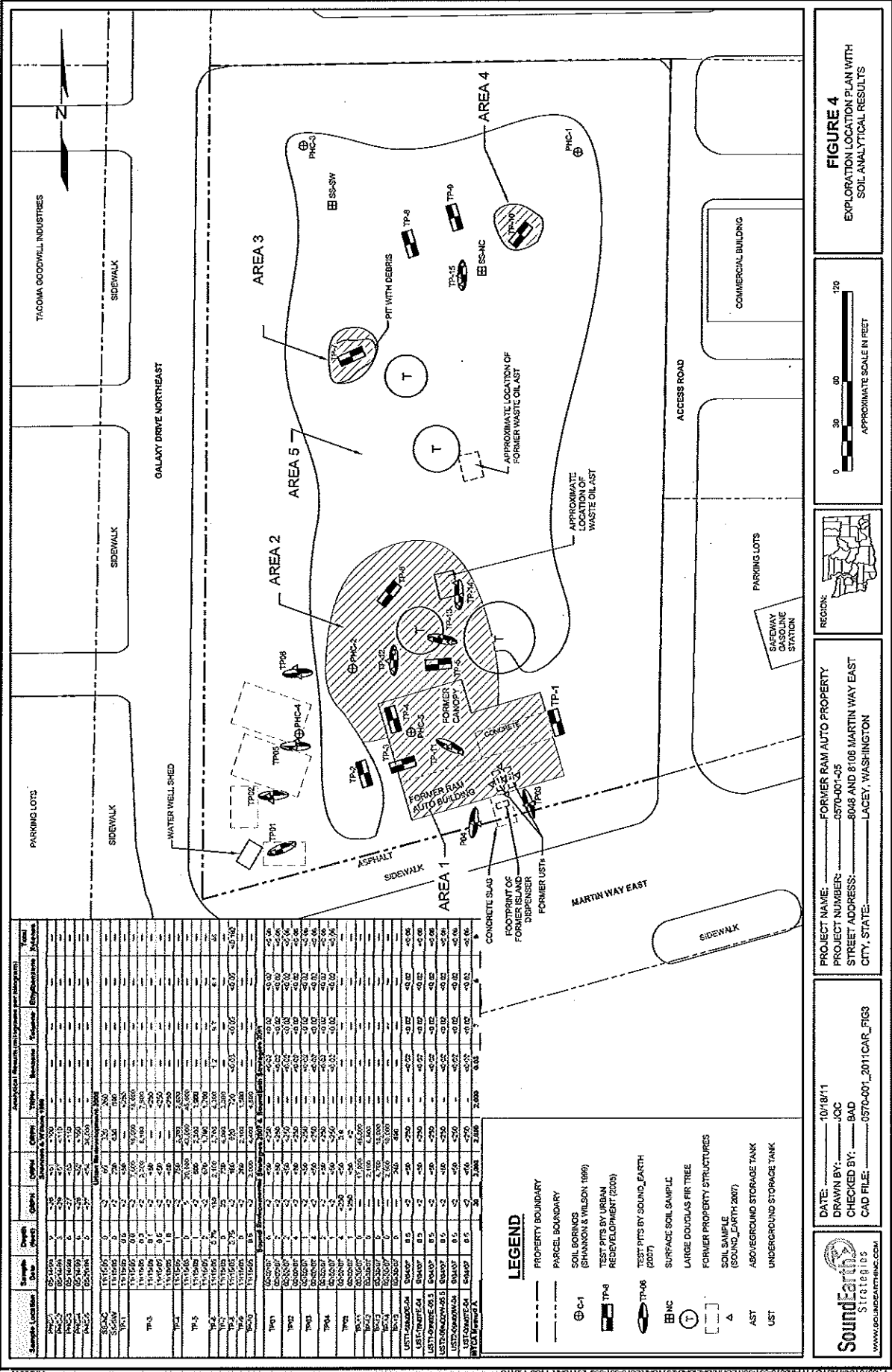


FIGURE 4
EXPLORATION LOCATION PLAN WITH
SOIL ANALYTICAL RESULTS



PROJECT NAME: FORMER RAM AUTO PROPERTY
 PROJECT NUMBER: 0570-001-05
 STREET ADDRESS: 8048 AND 8108 MARTIN WAY EAST
 CITY, STATE: LACEY, WASHINGTON

DATE: 10/18/11
 DRAWN BY: JQC
 CHECKED BY: BAD
 CAD FILE: 0570-001_2011CAR_FIG3



Sample Location	Sample ID	Depth (feet)	Depth to Groundwater (feet)	Moisture (%)	Specific Gravity	Grain Size (%)	Gravel (%)	Sand (%)	Fine Sand (%)	Silt (%)	Clay (%)	Plasticity Index	Flow Index	Shrinkage (%)	Swelling (%)	Unconfined Compressive Strength (psi)	Soil Type
TP-1	0570-001-05-TP-1	0	0	15	2.65	100	0	100	0	0	0	0	0	0	0	0	US-1
TP-2	0570-001-05-TP-2	0	0	15	2.65	100	0	100	0	0	0	0	0	0	0	0	US-1
TP-3	0570-001-05-TP-3	0	0	15	2.65	100	0	100	0	0	0	0	0	0	0	0	US-1
TP-4	0570-001-05-TP-4	0	0	15	2.65	100	0	100	0	0	0	0	0	0	0	0	US-1
TP-5	0570-001-05-TP-5	0	0	15	2.65	100	0	100	0	0	0	0	0	0	0	0	US-1
TP-6	0570-001-05-TP-6	0	0	15	2.65	100	0	100	0	0	0	0	0	0	0	0	US-1
TP-7	0570-001-05-TP-7	0	0	15	2.65	100	0	100	0	0	0	0	0	0	0	0	US-1
TP-8	0570-001-05-TP-8	0	0	15	2.65	100	0	100	0	0	0	0	0	0	0	0	US-1
TP-9	0570-001-05-TP-9	0	0	15	2.65	100	0	100	0	0	0	0	0	0	0	0	US-1
PHC-1	0570-001-05-PHC-1	0	0	15	2.65	100	0	100	0	0	0	0	0	0	0	0	US-1
PHC-2	0570-001-05-PHC-2	0	0	15	2.65	100	0	100	0	0	0	0	0	0	0	0	US-1
PHC-3	0570-001-05-PHC-3	0	0	15	2.65	100	0	100	0	0	0	0	0	0	0	0	US-1
PHC-4	0570-001-05-PHC-4	0	0	15	2.65	100	0	100	0	0	0	0	0	0	0	0	US-1

LEGEND

- PROPERTY BOUNDARY
- - - PARCEL BOUNDARY
- ⊕ C-1 SOIL BORINGS (SHANNON & WILSON 1999)
- TP-# TEST PITS BY URSAN REDEVELOPMENT (2010)
- TP-# TEST PITS BY SOUND_EARTH (2011)
- ⊕ NC SURFACE SOIL SAMPLE
- ⊕ LARGE DOUGLAS FIR TREE
- FORMER PROPERTY STRUCTURES
- ▲ SOIL SAMPLE (SOUND_EARTH 2011)
- AST ABOVEGROUND STORAGE TANK
- UST UNDERGROUND STORAGE TANK

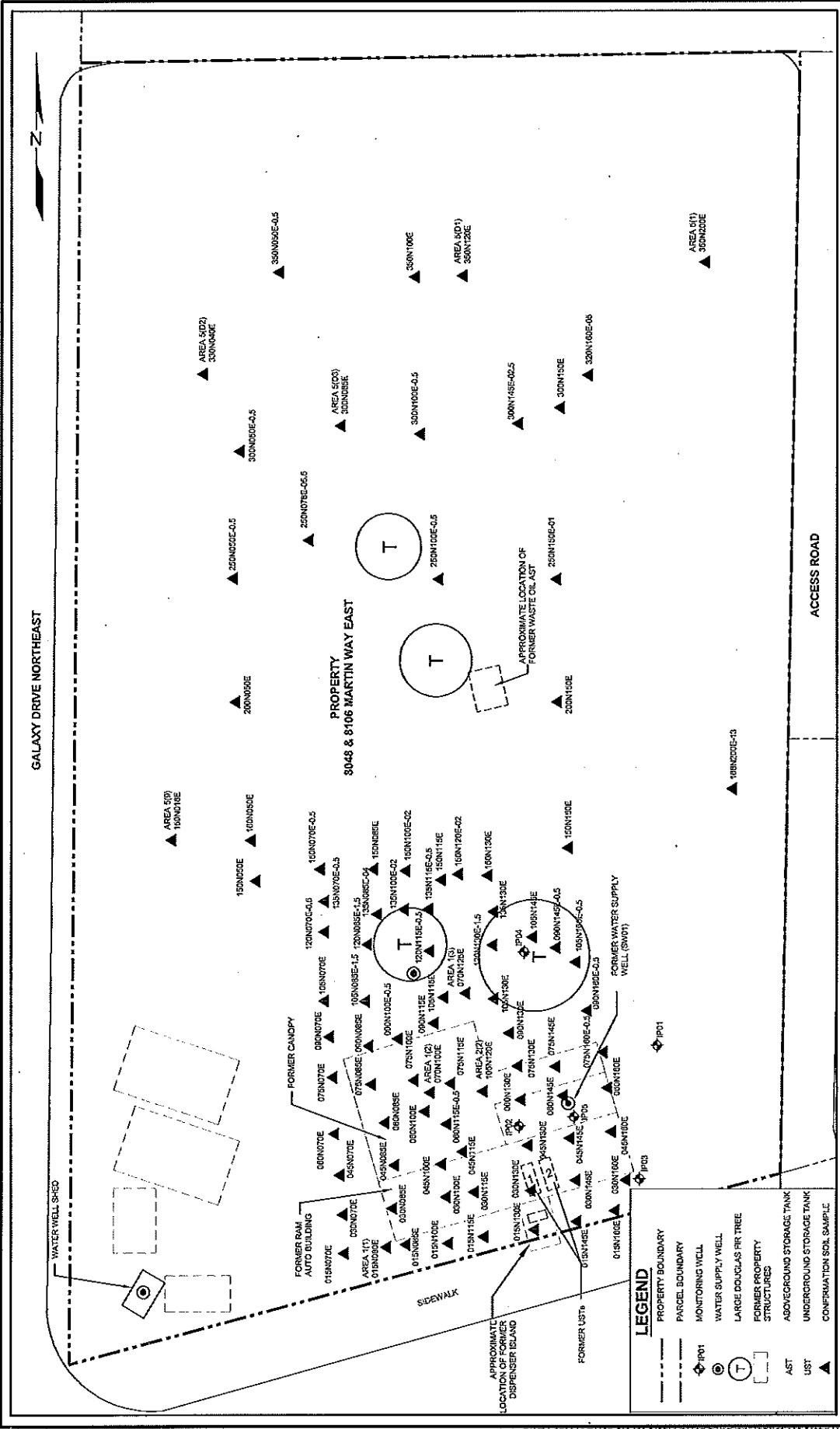
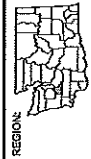


FIGURE 5.
CONFIRMATION SOIL SAMPLE LOCATIONS



REGION: _____
 PROJECT NAME: FORMER RAM AUTO PROPERTY
 PROJECT NUMBER: 057C-001-05
 STREET ADDRESS: 8048 AND 8106 MARTIN WAY EAST
 CITY, STATE: LACEY, WASHINGTON

DATE: 10/18/11
 DRAWN BY: JQC
 CHECKED BY: BAD
 CAD FILE: 057C-001_2011CAR_FIG5



Table 1
Groundwater Analytical Results
Former RAM Auto Property
8048 and 8106 Martin Way East
Lacey, Washington

WellID	Sample Date	Depth to Groundwater ¹ (feet)	Groundwater Elevation ² (feet)	Analytical Results (µg/L)						
				DRPH ³	GRPH ⁴	Benzene ⁵	Toluene ⁵	Ethylbenzene ⁵	Total Xylenes ⁵	
IP01 TOC: 100.00'	10/25/07	51.47	48.53	<50	<100	<1	<1	<1	<1	<3
	09/07/10	48.61	51.39	<50	<100	<1	<1	<1	<1	<3
	08/24/11	51.96	48.04	<50	<100	<1	<1	<1	<1	<3
IP02 TOC: 100.00'	10/25/07	50.34	49.66	<53	<270	<1	<1	<1	<1	<3
	09/07/10	48.32	51.68	<50	<100	<1	<1	<1	<1	<3
	08/24/11	50.93	49.07	<50	<100	<1	<1	<1	<1	<3
IP03 TOC: 95.45'	09/07/10	47.89	47.57	<50	<100	<1	<1	<1	<1	<3
	08/24/11	46.77	48.69	<50	<100	<1	<1	<1	<1	<3
	09/07/10	50.60	46.51	<50	<100	<1	<1	<1	<1	<3
IP04 TOC: 97.11'	08/24/11	49.59	47.52	<50	<100	<1	<1	<1	<1	<3
	08/24/11	46.79	--	<50	<100	<1	<1	<1	<1	<3
	MTCA Method A Cleanup Level for Groundwater⁶				500	500	5	1,000	700	1,000

NOTES:

¹Samples analyzed by Friedman & Bruys, Inc., of Seattle, Washington.

²As measured in feet below a fixed spot on the well casing rim.

³Measured relative to a temporary benchmark with an assumed elevation of 100.00 feet.

⁴Analyzed by Method NW7PH-Dx.

⁵Analyzed by Method NW7PH-Gx.

⁶MTCA Method A Cleanup Levels, Table 720-1, Section 900, Chapter 173-340 of the Washington Administrative Code, revised November 2007.

⁷800 µg/L when benzene is detected and 1,000 µg/L when benzene is not detected.

< = not detected at a concentration exceeding the laboratory reporting limit

-- = not sampled/not analyzed

µg/L = micrograms per liter

DRPH = diesel-range petroleum hydrocarbons

GRPH = gasoline-range petroleum hydrocarbons

MTCA = Washington State Model Toxics Control Act

NW7PH = Northwest Total Petroleum Hydrocarbon

ORPH = oil-range petroleum hydrocarbons

TOC = top of casing elevation



Table 2
Soil Analytical Results
Former RAM Auto Property
8048 and 8106 Martin Way East
Lacey, Washington

Sample ID	Sample Type	Date Sampled	Location	Depth (feet)	GRPH ¹	DRPH ²	ORPH ²	TRPH ²	Benzene ³	Toluene ⁴	Ethylbenzene ⁵	Total Xylenes ⁶	Cadmium	Lead
Shannon & Wilson, Inc. 1999														
C-1-9	--	05/14/99	--	9	<26	<51	<100	--	--	--	--	--	--	--
C-2-3	--	05/14/99	--	3	<29	<57	<110	--	--	--	--	--	--	--
C-3-6	--	05/14/99	--	6	<27	<53	<110	--	--	--	--	--	--	--
C-4-6	--	05/14/99	--	6	<26	<52	<100	--	--	--	--	--	--	--
C-5-0	--	05/20/99	--	0	<27	<54	38,000	--	--	--	--	--	11	310
Urban Redevelopment 2005														
SS-NC	--	11/15/05	--	0	<2	65	320	260	--	--	--	--	1.99	73.1
SS-SW	--	11/15/05	--	0	<2	230	630	590	--	--	--	--	2.36	92.5
TP1.4"	--	11/15/05	--	0.5	<2	<50	--	<250	--	--	--	--	--	--
TP3 0"-3"	--	11/15/05	--	0	<2	7,600	18,000	18,000	--	--	--	--	3.13	107
TP3.4"	--	11/15/05	--	0.5	<2	3,500	8,100	7,900	--	--	--	--	--	--
TP3 2"	--	11/15/05	--	0.1	<2	<50	--	<250	--	--	--	--	--	--
TP3 6"	--	11/15/05	--	0.5	<2	<50	--	<250	--	--	--	--	--	--
TP3 1'	--	11/15/05	--	1	<2	<50	--	<250	--	--	--	--	--	--
TP4 1'	--	11/15/05	--	1	<2	750	3,200	2,600	--	--	--	--	2.78	284
TP5 0-2"	--	11/15/05	--	0	5	20,000	43,000	45,000	--	--	--	--	7.16	197
TP5 1'	--	11/15/05	--	1	<2	600	2,300	1,900	--	--	--	--	--	--
TP5 2'	--	11/15/05	--	2	<2	670	1,700	1,700	--	--	--	--	--	--
TP6 8"	--	11/15/05	--	0.75	150	2,100	3,700	4,300	1.2	9.7	6.1	45	--	--
TP7 0-4"	--	11/15/05	--	0	23	730	4,000	3,000	--	--	--	--	--	--
TP8 6"-8"	--	11/15/05	--	0.75	<2	180	920	720	<0.03	<0.05	<0.05	<0.182	2.81	55.1
TP9 SP	--	11/15/05	--	0	<2	260	2,100	1,500	--	--	--	--	1.64	156
TP10.4"-6"	--	11/15/05	--	0.5	<2	2,000	4,400	4,500	--	--	--	--	--	--
MTCA Method A Cleanup Levels for Soil ⁷														
					100/30 ⁸	2,000	2,000	2,000	0.03	7	6	9	2	250



Table 2
Soil Analytical Results
Former RAM Auto Property
8048 and 8106 Martin Way East
Lacey, Washington

Sample ID	Sample Type	Date Sampled	Location	Depth (feet)	GRPH ¹	DRPH ²	ORPH ³	TRPH ⁴	Benzene ⁵	Toluene ⁶	Ethylbenzene ⁷	Total Xylenes ⁸	Cadmium	Lead
SoundEarth Strategies, Inc. 2007 and 2011														
015N070E-00	Confirmation	10/05/07	015N 070E	0	<2	<50	<250	--	<0.02	<0.02	<0.02	<0.06	0.97	46.1
C-Area1(1)@surface	Confirmation	9/14/07	015N 080E	0	<2	<50	<250	--	<0.02	<0.02	<0.02	<0.06	<1	2.16
015N085E-00	Confirmation	10/05/07	015N 085E	0	<2	<50	<250	--	<0.02	<0.02	<0.02	<0.06	0.75	37.1
015N100E-00	Confirmation	10/05/07	015N 100E	0	<2	<50	<250	--	<0.02	<0.02	<0.02	<0.06	<0.5	14.5
015N115E-00	Confirmation	10/05/07	015N 115E	0	<2	<50	<250	--	<0.02	<0.02	<0.02	<0.06	<0.5	16.7
015N130E-00	Confirmation	10/05/07	015N 130E	0	<2	120 ⁹	480	--	<0.02	<0.02	<0.02	<0.06	0.98	57.4
015N145E-00	Confirmation	10/05/07	015N 145E	0	<2	78 ⁹	510	--	<0.02	<0.02	<0.02	<0.06	<0.5	14.9
015N160E-00	Confirmation	10/05/07	015N 160E	0	<2	<50	<250	--	<0.02	<0.02	<0.02	<0.06	<0.5	18.0
030N070E-00	Confirmation	10/05/07	030N 070E	0	<2	<50	<250	--	<0.02	<0.02	<0.02	<0.06	<0.5	10.4
030N085E-00	Confirmation	10/05/07	030N 085E	0	<2	<50	<250	--	<0.02	<0.02	<0.02	<0.06	<0.5	5.97
030N100E-00	Confirmation	10/05/07	030N 100E	0	<2	<50	<250	--	<0.02	<0.02	<0.02	<0.06	<0.5	19.7
030N115E-00	Confirmation	10/05/07	030N 115E	0	4	110 ⁹	550	--	<0.02	<0.02	<0.02	<0.06	1.10	70.9
030N130E-00	Confirmation	10/05/07	030N 130E	0	<2	99 ⁹	470	--	<0.02	<0.02	<0.02	<0.06	0.79	38.6
030N145E-00	Confirmation	10/05/07	030N 145E	0	<2	<50	<250	--	<0.02	<0.02	<0.02	<0.06	<0.5	14.4
030N160E-00	Confirmation	10/05/07	030N 160E	0	<2	<50	<250	--	<0.02	<0.02	<0.02	<0.06	<0.5	16.6
045N070E-00	Confirmation	10/05/07	045N 070E	0	<2	<50	<250	--	<0.02	<0.02	<0.02	<0.06	0.59	40.1
045N085E-00	Confirmation	10/05/07	045N 085E	0	<2	<50	<250	--	<0.02	<0.02	<0.02	<0.06	<0.5	4.26
045N100E-00	Confirmation	10/05/07	045N 100E	0	<2	<50	<250	--	<0.02	<0.02	<0.02	<0.06	<0.5	16.9
045N115E-00	Confirmation	10/05/07	045N 115E	0	<2	<50	<250	--	<0.02	<0.02	<0.02	<0.06	<0.5	10.3
045N130E-3.5	Confirmation	10/05/07	045N 130E	3.5	<2	<50	<250	--	<0.02	<0.02	<0.02	<0.06	<0.5	4.49
045N145E-2.5	Confirmation	10/05/07	045N 145E	2.5	<2	<50	<250	--	<0.02	<0.02	<0.02	<0.06	<0.5	4.04
045N160E-00	Confirmation	10/05/07	045N 160E	0	<2	83 ⁹	380	--	<0.02	<0.02	<0.02	<0.06	0.80	71.6
060N070E-00	Confirmation	10/05/07	060N 070E	0	<2	<50	<250	--	<0.02	<0.02	<0.02	<0.06	0.51	23.8
060N085E-00	Confirmation	10/05/07	060N 085E	0	<2	<50	<250	--	<0.02	<0.02	<0.02	<0.06	<0.5	4.35
060N100E-00	Confirmation	10/05/07	060N 100E	0	<2	<50	<250	--	<0.02	<0.02	<0.02	<0.06	<0.5	2.18
MTCA Method A Cleanup Levels for Soil ¹⁰														
					100/30 ⁹	2,000	2,000	2,000	0.03	7	6	9	2	250



Table 2
Soil Analytical Results
Former RAM Auto Property
8048 and 8106 Martin Way East
Lacey, Washington

Sample ID	Sample Type	Date Sampled	Location	Depth (feet)	GRPH ¹	DRPH ²	ORPH ²	TRPH ²	Benzene ³	Toluene ³	Ethylbenzene ³	Total Xylenes ³	Cadmium	Lead
SoundEarth Strategies, Inc. 2007 and 2011														
060N115E-00	Performance	10/05/07	060N 115E	0	<2	<50	<250	--	<0.02	<0.02	<0.02	<0.06	4.58	26.1
060N115E-0.5	Confirmation	4/28/11	060N 115E	0.5	--	--	--	--	--	--	--	--	<1	15.7
060N130E-2.5	Confirmation	10/05/07	060N 130E	2.5	<2	<50	<250	--	<0.02	<0.02	<0.02	<0.06	<0.5	10.8
060N145E-2.5	Confirmation	10/05/07	060N 145E	2.5	<2	<50	<250	--	<0.02	<0.02	<0.02	<0.06	<0.5	4.78
060N160E-00	Confirmation	10/05/07	060N 160E	0	<2	<50	<250	--	<0.02	<0.02	<0.02	<0.06	<0.5	36.1
C-Area1(2)@1.0'	Confirmation	9/14/07	070N 100E	1	<2	<50	<250	--	<0.02	0.06	<0.02	<0.06	<1	25.5
C-Area1(3)@2.0'	Confirmation	9/14/07	070N 125E	2	<2	<50	<250	--	<0.02	<0.02	<0.02	<0.06	<1	6.06
075N070E-00	Confirmation	10/05/07	075N 070E	0	<2	<50	<250	--	<0.02	<0.02	<0.02	<0.06	<0.5	6.65
075N085E-00	Confirmation	10/05/07	075N 085E	0	<2	<50	<250	--	<0.02	<0.02	<0.02	<0.06	<0.5	5.29
075N100E-00	Confirmation	10/05/07	075N 100E	0	<2	<50	<250	--	<0.02	<0.02	<0.02	<0.06	0.59	20.3
075N115E-00	Confirmation	10/05/07	075N 115E	0	<2	300 ⁴	1,100	--	<0.02	<0.02	<0.02	<0.06	1.66	90.9
075N130E-2.5	Confirmation	10/05/07	075N 130E	2.5	<2	<50	<250	--	<0.02	<0.02	<0.02	<0.06	<0.5	7.06
075N145E-2.5	Confirmation	10/05/07	075N 145E	2.5	<2	<50	<250	--	<0.02	<0.02	<0.02	<0.06	<0.5	5.61
075N160E-00	Performance	10/05/07	075N 160E	0	<2	330 ⁴	1,100	--	<0.02	<0.02	<0.02	<0.06	3.14	144
075N160E-0.5	Confirmation	11/07/07	075N 160E	0.5	--	<50	<250	--	--	--	--	--	0.79	6.21
090N070E-00	Confirmation	10/05/07	090N 070E	0	<2	64 ⁴	320	--	<0.02	<0.02	<0.02	<0.06	<0.5	12.0
090N085E-00	Confirmation	10/05/07	090N 085E	0	<2	<50	<250	--	<0.02	<0.02	<0.02	<0.06	<0.5	18.4
090N100E-00	Performance	10/05/07	090N 100E	0	<2	<50	520	--	<0.02	<0.02	<0.02	<0.06	2.80	283
090N100E-0.5	Confirmation	11/07/07	090N 100E	0.5	--	<50	<250	--	--	--	--	--	<0.5	2.18
090N115E-00	Confirmation	10/05/07	090N 115E	0	<2	90 ⁴	360	--	<0.02	<0.02	<0.02	<0.06	1.46	74.5
090N130E-00	Confirmation	10/05/07	090N 130E	0	<2	<50	<250	--	<0.02	<0.02	<0.02	<0.06	0.57	27.8
090N145E-00	Performance	10/05/07	090N 145E	0	4	520 ⁴	1,700	--	<0.02	<0.02	<0.02	<0.06	3.68	190
090N145E-0.5	Confirmation	11/07/07	090N 145E	0.5	--	<50	<250	--	--	--	--	--	<0.5	4.30
090N160E-00	Performance	10/05/07	090N 160E	0	<2	1,400 ⁴	4,900	--	<0.02	<0.02	<0.02	<0.06	3.60	116
090N160E-0.5	Confirmation	11/07/07	090N 160E	0.5	--	<50	<250	--	--	--	--	--	<0.5	<1
105N070E-00	Confirmation	10/05/07	105N 070E	0	<2	140 ⁴	980	--	<0.02	<0.02	<0.02	<0.06	1.32	70.7
105N085E-00	Performance	10/05/07	105N 085E	0	<2	180 ⁴	830	--	<0.02	<0.02	<0.02	<0.06	3.49	332
MTC A Method A Cleanup Levels for Soil ⁵					100/30 ⁶	2,000	2,000	2,000	0.03	7	6	9	2	250

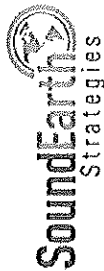


Table 2
Soil Analytical Results
Former RAM Auto Property
8048 and 8106 Martin Way East
Lacey, Washington

Sample ID	Sample Type	Date Sampled	Location	Depth (feet)	GRPH ¹	DRPH ²	ORPH ²	TRPH ²	Benzene ³	Toluene ³	Ethylbenzene ³	Total Xylenes ³	Cadmium	Lead
SoundEarth Strategies, Inc. 2007 and 2011														
105N085E-00	Performance	10/05/07	105N 085E	0	<2	180 ⁴	830	--	<0.02	<0.02	<0.02	<0.06	3.49	332
105N085E-0.5	Performance	11/07/07	105N 085E	0.5	--	<50	<250	--	--	--	--	--	2.12	76.9
105N085E-01.5	Confirmation	4/28/11	105N 085E	1.5	--	--	--	--	--	--	--	--	<1	1.3
105N115E-00	Confirmation	10/05/07	105N 115E	0	<2	67 ⁴	290	--	<0.02	<0.02	<0.02	<0.06	0.76	94.8
C-Area 2 (2) @ 6"	Confirmation	9/14/07	105N 120E	0.5	<2	210 ⁴	1,500	--	0.02	0.03	<0.02	<0.06	1.89	163
105N130E-00	Confirmation	10/05/07	105N 130E	0	<2	<50	<250	--	<0.02	<0.02	<0.02	<0.06	0.85	38.7
105N145E-00	Confirmation	10/05/07	105N 145E	0	4	440 ⁴	1700	--	<0.02	<0.02	<0.02	<0.06	1.88	157
105N160E-00	Performance	10/05/07	105N 160E	0	<2	75 ⁴	320	--	<0.02	<0.02	<0.02	<0.06	0.60	23.0
105N160E-0.5	Confirmation	11/07/07	105N 160E	0.5	--	<50	<250	--	--	--	--	--	<0.5	4.52
120N070E-00	Performance	10/05/07	120N 070E	0	<2	7,000 ⁴	12,000	--	<0.02	<0.02	<0.02	<0.06	2.61	185
120N070E-0.5	Confirmation	11/07/07	120N 070E	0.5	--	<50	<250	--	--	--	--	--	0.70	19.5
120N085E-00	Performance	10/05/07	120N 085E	0	<2	200 ⁴	950	--	<0.02	<0.02	<0.02	<0.06	10.8	277
120N085E-0.5	Performance	11/07/07	120N 085E	0.5	--	87 ⁴	360	--	--	--	--	--	3.60	178
120N085E-1.5	Confirmation	4/28/11	120N 085E	1.5	--	--	--	--	--	--	--	--	<1	3.38
120N115E-00	Performance	10/05/07	120N 115E	0	<2	1,100 ⁴	2,200	--	<0.02	<0.02	<0.02	<0.06	1.92	148
120N115E-0.5	Confirmation	11/07/07	120N 115E	0.5	--	490 ⁴	980	--	--	--	--	--	1.10	94.3
120N130E-00	Performance	10/05/07	120N 130E	0	<2	320 ⁴	1,000	--	<0.02	<0.02	<0.02	<0.06	2.62	276
120N130E-0.5	Performance	11/07/07	120N 130E	0.5	--	10,000	1,500 ⁴	--	--	--	--	--	0.56	42.8
120N130E-1.5	Confirmation	4/28/11	120N 130E	1.5	--	<50	<250	--	--	--	--	--	--	--
135N070E-00	Performance	10/05/07	135N 070E	0	<2	210 ⁴	870	--	<0.02	<0.02	<0.02	<0.06	2.74	180
135N070E-0.5	Confirmation	11/07/07	135N 070E	0.5	--	84 ⁴	390	--	--	--	--	--	0.94	71.0
135N085E-00	Performance	10/05/07	135N 085E	0	<2	690 ⁴	2,700	--	<0.02	<0.02	<0.02	<0.06	5.84	565
135N085E-0.5	Performance	11/07/07	135N 085E	0.5	--	380 ⁴	1,900	--	--	--	--	--	3.46	339
135N085E-04	Confirmation	4/28/11	135N 085E	4	--	--	--	--	--	--	--	--	<1	1.78
135N100E-00	Performance	10/05/07	135N 100E	0	<2	270 ⁴	1,400	--	<0.02	<0.02	<0.02	<0.06	6.69	436
135N100E-0.5	Performance	11/07/07	135N 100E	0.5	--	680 ⁴	3,600	--	--	--	--	--	5.13	484
135N100E-1.5	Performance	4/28/11	135N 100E	1.5	--	85 ⁴	320	--	--	--	--	--	3.56	261
135N100E-02	Confirmation	5/09/11	135N 100E	2	--	--	--	--	--	--	--	--	<1	5.62
MTCA Method A Cleanup Levels for Soil⁵					100/30⁶	2,000	2,000	2,000	0.03	7	6	9	2	250

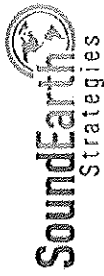


Table 2
Soil Analytical Results
Former RAM Auto Property
8048 and 8106 Martin Way East
Lacey, Washington

Sample ID	Sample Type	Date Sampled	Location	Depth (feet)	GRPH ¹	DRPH ²	ORPH ³	TRPH ⁴	Benzene ⁵	Toluene ⁶	Ethylbenzene ⁷	Total Xylenes ⁸	Cadmium	Lead
135N115E-00	Performance	10/05/07	135N 115E	0	<2	640 ⁴	2,100	--	<0.02	<0.02	<0.02	<0.06	3.77	252
135N115E-0.5	Confirmation	11/07/07	135N 115E	0.5	--	<50	<250	--	--	--	--	--	1.66	57.4
135N130E-00	Confirmation	10/05/07	135N 130E	0	<2	350 ⁴	1,200	--	<0.02	<0.02	<0.02	<0.06	1.71	124
C-Area5(D5)@3.0'	Confirmation	9/14/07	140N 025E	3	<2	160 ⁴	850	--	<0.02	<0.02	<0.02	<0.06	3.68	433
150N050E-00	Confirmation	10/04/07	150N 050E	0	<2	<50	<250	--	<0.02	<0.02	<0.02	<0.06	0.81	64.8
150N070E-00	Performance	10/05/07	150N 070E	0	<2	890 ⁴	3,600	--	<0.02	<0.02	<0.02	<0.06	4.28	499
150N070E-0.5	Confirmation	11/07/07	150N 070E	0.5	--	<50	<250	--	--	--	--	--	0.51	4.37
150N085E-00	Confirmation	10/05/07	150N 085E	0	<2	130 ⁴	570	--	<0.02	<0.02	<0.02	<0.06	1.71	165
150N100E-00	Performance	10/05/07	150N 100E	0	<2	170 ⁴	760	--	<0.02	<0.02	<0.02	<0.06	5.49	482
150N100E-0.5	Performance	11/07/07	150N 100E	0.5	--	<50	<250	--	--	--	--	--	2.25	139
150N100E-1.5	Performance	4/28/11	150N 100E	1.5	--	--	--	--	--	--	--	--	3.89	173
150N100E-02	Confirmation	5/02/11	150N 100E	0.5	--	--	--	--	--	--	--	--	<1	14.9
150N115E-00	Confirmation	10/05/07	150N 115E	0	<2	240 ⁴	1,000	--	<0.02	<0.02	<0.02	<0.06	1.80	109
150N120E-0.5	Performance	11/07/07	150N 120E	0.5	--	<50	<250	--	--	--	--	--	0.77	7.78
C-Area2(1)@1.5'	Performance	9/14/07	150N 120E	1.5	<2	1,300 ⁴	4,700	--	<0.02	0.05	<0.02	<0.06	4.59	284
150N120E-02	Confirmation	4/28/11	150N 120E	2	--	<50	<250	--	--	--	--	--	<1	43.4
150N130E-00	Confirmation	10/05/07	150N 130E	0	<2	180 ⁴	810	--	<0.02	<0.02	<0.02	<0.06	1.12	89.4
C-Area5(9)@3.5	Confirmation	9/17/07	159N018E	3.5	<2	<50	<250	--	<0.02	<0.02	<0.02	<0.06	<1	6.17
C-Area5(D4)@4.0'	Confirmation	9/14/07	160N 025E	4	<2	67 ⁴	320	--	<0.02	<0.02	<0.02	<0.06	3.17	273
160N050E-00	Confirmation	10/04/07	160N 050E	0	<2	<50	<250	--	<0.02	<0.02	<0.02	<0.06	1.22	58.6
C-Area5(8)@10'-12'	Performance	9/14/07	168N 200E	10-12	<2	130 ⁴	2,600	--	<0.02	<0.02	<0.02	<0.06	<1	11.0
168N200E-13	Confirmation	4/28/11	168N 200E	13	--	<50	<250	--	--	--	--	--	<1	3.13
MTCA Method A Cleanup Levels for Soil ⁹					100/30 ¹⁰	2,000	2,000	2,000	0.03	7	6	9	2	250

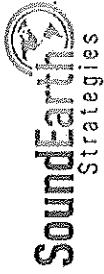


Table 2
Soil Analytical Results
Former RAM Auto Property
8048 and 8106 Martin Way East
Lacey, Washington

Sample ID	Sample Type	Date Sampled	Location	Depth (feet)	GRP1 ¹	DRPH ²	ORPH ²	TRPH ²	Benzene ³	Toluene ³	Ethylbenzene ³	Total Xylenes ³	Cadmium	Lead
IP01-50'	IP Well	10/19/07	IP01	-	<2	<50	<250	--	<0.02	<0.02	<0.02	<0.06	--	--
IP02-49'	IP Well	10/22/07	IP02	-	<2	<50	<250	--	--	--	--	--	--	--
IP02-56'	IP Well	10/22/07	IP02	-	<2	<50	<250	--	--	--	--	--	--	--
IP3-45	IP Well	9/01/10	IP3	-	<2	<50	<250	--	<0.02	<0.02	<0.02	<0.06	--	--
IP3-49	IP Well	9/01/10	IP3	-	<2	<50	<250	--	<0.02	<0.02	<0.02	<0.06	--	--
IP3-55	IP Well	9/01/10	IP3	-	<2	<50	<250	--	<0.02	<0.02	<0.02	<0.06	--	--
IP4-45	IP Well	9/01/10	IP4	-	<2	<50	<250	--	<0.02	<0.02	<0.02	<0.06	--	--
IP4-49	IP Well	9/01/10	IP4	-	<2	<50	<250	--	<0.02	<0.02	<0.02	<0.06	--	--
IP5-30	IP Well	8/15/11	IP5	-	<2	<50	<250	--	<0.02	<0.02	<0.02	<0.06	--	--
IP5-49	IP Well	8/15/11	IP5	-	<2	<50	<250	--	<0.02	<0.02	<0.02	<0.06	--	--
IP5-55	IP Well	8/15/11	IP5	-	<2	<50	<250	--	<0.02	<0.02	<0.02	<0.06	--	--
Area1 SP-20070905	Stockpile	9/05/07	--	--	3	130*	360	--	<0.02	<0.02	<0.02	<0.06	<1	37.5
Area2SP-East	Stockpile	9/6/07	--	--	22	<50	<250	--	<0.02	0.30	0.07	1.8	<1	23.4
Area2SP2-East	Stockpile	9/7/07	--	--	<2	790*	2,600	--	<0.02	<0.02	<0.02	<0.06	2.38	138
Area1-SP2	Stockpile	9/7/07	--	--	<2	110*	470	--	<0.02	<0.02	<0.02	<0.06	1.10	83.1
Area2SP1-South	Stockpile	9/11/7	--	--	2	87*	530	--	<0.02	<0.02	<0.02	<0.06	3.34	229
Area2SP2-South	Stockpile	9/11/7	--	--	<2	540*	1,700	--	<0.02	<0.02	<0.02	<0.06	<1	69.6
Area4SP	Stockpile	9/11/7	--	--	<3	<50	<250	--	<0.03	<0.03	<0.03	<0.09	1.07	27.6
Area5SP1-North	Stockpile	9/11/7	--	--	<2	<50	<250	--	<0.02	<0.02	<0.02	<0.06	7.20	329
Area5SP2-North	Stockpile	9/11/7	--	--	<2	76*	410	--	<0.02	<0.02	<0.02	<0.06	5.20	366
Area1-SP3	Stockpile	9/11/7	--	--	160	820*	3,100	--	<0.03	0.19	0.59	9.7**	1.70	116
Area 5 SP-West	Stockpile	9/12/07	--	--	21	190*	550	--	<0.02	<0.02	<0.02	0.40	1.38	124
MITCA Method A Cleanup Levels for Soil ⁴					100/30 ⁵	2,000	2,000	2,000	0.03	7	6	9	2	250



Table 2
Soil Analytical Results
Former RAM Auto Property
8048 and 8106 Martin Way East
Lacey, Washington

Sample ID	Sample Type	Date Sampled	Location	Depth (feet)	GRPH ¹	DRPH ²	ORPH ³	TRPH ⁴	Benzene ⁵	Toluene ⁶	Ethylbenzene ⁷	Total Xylenes ⁸	Cadmium	Lead
SoundEarth Strategies, Inc. 2007 and 2011														
Area 5 SP-NE	Stockpile	9/12/07	--	--	5	5,000	760 ⁹	--	<0.02	<0.02	<0.02	<0.06	8.16	135
Area 5 SP1-East	Stockpile	9/12/07	--	--	52	<50	290	--	<0.02	<0.02	0.03	0.57	1.45	121
Area 5 SP2-East	Stockpile	9/12/07	--	--	41	3,200	<250	--	<0.02	<0.02	0.05	<0.06	<1	19.8
Area5-SP03	Stockpile	11/07/07	--	--	--	200 ⁸	710	--	--	--	--	--	3.98	294
Area5-SP04	Stockpile	11/07/07	--	--	--	190 ⁸	780	--	--	--	--	--	7.60	676
Area5-SP05	Stockpile	11/07/07	--	--	--	180 ⁸	690	--	--	--	--	--	4.49	452
Area4-SP1	Stockpile	11/07/07	--	--	--	190 ⁸	710	--	--	--	--	--	4.43	399
SP-Debris-1	Stockpile	9/04/07	--	--	620	1,100 ⁸	1,800	--	<2 ¹⁰	.83	.84	84 ¹⁰	3.24	143
SP-Debris-2	Stockpile	4/28/11	--	--	--	120 ⁸	370	--	--	--	--	--	1.75	148
SP-Debris-3	Stockpile	4/28/11	--	--	--	83 ⁸	<250	--	--	--	--	--	1.83	161
MITCA Method A Cleanup Levels for Soil ¹¹					100/30 ⁴	2,000	2,000	2,000	0.03	7	6	9	2	250

NOTES:

Results in RED indicates concentrations that exceed MITCA Method A Cleanup Levels for unrestricted land use.

Results reported in milligrams per kilogram unless otherwise indicated.

Chemical analyses conducted by Friedman & Bruys, Inc., of Seattle, Washington.

¹Analyzed by Method NWTPH-Gx.

²Analyzed by Method NWTPH-Dx.

³Analyzed by EPA Method 8021B or 8260B.

⁴MITCA Method A Cleanup Levels for Soil from Table 740-1 of Washington Administrative Code 173-240-900 Tables.

⁵100 mg/kg when benzene is not present and 30 mg/kg when benzene is present.

⁶120 mg/kg when benzene is not present and 30 mg/kg when benzene is present.

⁷Laboratory Method.

⁸The sample was diluted. Detection limits may be raised due to dilution.

⁹The value reported fell outside the calibration range established for this analyte and is an estimate.

¹⁰The pattern of peaks present is not indicative of diesel.

¹¹The pattern of peaks present is not indicative of motor oil.

-- = not analyzed

< = not detected at concentrations exceeding the laboratory reporting limit

DRPH = diesel-range petroleum hydrocarbons

EPA = U.S. Environmental Protection Agency

GRPH = gasoline-range petroleum hydrocarbons

mg/kg = milligrams per kilogram

MITCA = Washington State Model Toxics Control Act

NWTPH = Northwest Total Petroleum Hydrocarbon

ORPH = oil-range petroleum hydrocarbons

TRPH = total recoverable petroleum hydrocarbons