

SITE CLOSURE REPORT ADDENDUM

FORMER CLEANING CENTER OF REDMOND 15796 REDMOND WAY REDMOND, WASHINGTON

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ACRONYMS AND ABBREVIATIONS

bgs	below ground surface
Closure Report	<i>Site Closure Report, Cleaning Center of Redmond, 15796 Redmond Way, Redmond, Washington</i> dated September 21, 2007, prepared by Farallon
CPOC	conditional point of compliance
Ecology	Washington State Department of Ecology
Ecology Memorandum	<i>Implementation Memorandum No. 16, Developing Conditional Points of Compliance at MTCA Sites Where Groundwater Discharges to Surface Water</i> dated December 2016, prepared by Ecology
Farallon	Farallon Consulting, L.L.C.
µg/l	micrograms per liter
MTCA	Washington State Model Toxics Control Act Cleanup Regulation
NFA determination	No Further Action determination
PCE	tetrachloroethene
Property	Former Cleaning Center of Redmond facility at 15796 Redmond Way in Redmond, Washington
Site	source area proximate to the former dry cleaning machine and an area extending off of the Property to the northwest where PCE concentrations exceeded the applicable MTCA cleanup level for groundwater
SVE	soil vapor extraction
VCP	Voluntary Cleanup Program
WAC	Washington Administrative Code



1.0 INTRODUCTION

Farallon Consulting, L.L.C. (Farallon) has prepared this Site Closure Report Addendum to summarize supplemental information pertaining to the cleanup action and confirmational monitoring at the Former Cleaning Center of Redmond facility located at 15796 Redmond Way in Redmond, Washington (herein referred to as the Property) (Figure 1). The objectives of this Site Closure Report Addendum are to provide supporting information in the context of the recently published *Implementation Memorandum No. 16, Developing Conditional Points of Compliance at MTCA Sites Where Groundwater Discharges to Surface Water* dated December 2016, prepared by the Washington State Department of Ecology (Ecology) (2016b) (Ecology Memorandum) and provided in Appendix C; and to demonstrate to Ecology that a site-wide No Further Action (NFA) determination rather than the Property-specific NFA determination is warranted.

The cleanup action by soil vapor extraction (SVE) was previously completed in accordance with the Washington State Model Toxics Control Act Cleanup Regulation (MTCA), as established in Chapter 173-340 of the Washington Administrative Code (WAC 173-340), resulting in a Property-specific NFA determination by Ecology on April 1, 2011 (Appendix A). Information pertaining to the cleanup action completion was provided to Ecology in detail in the *Site Closure Report, Cleaning Center of Redmond, 15796 Redmond Way, Redmond, Washington* dated September 21, 2007, prepared by Farallon (2007) (Closure Report) (Appendix B), under Ecology Voluntary Cleanup Program (VCP) Identification No. NW1324.

1.1 PROPERTY AND SITE SUMMARY

A release of the dry cleaning solvent tetrachloroethene (PCE) was confirmed at the Property in 1999, and an SVE remediation system was installed in 2003 to address concentrations of PCE in soil and groundwater. PCE was identified as the constituent of concern for the site. A “site,” as defined by MTCA, consists of all areas where the constituents of concern have come to be located at concentrations exceeding applicable cleanup levels established under MTCA. The site associated with the Former Cleaning Center of Redmond consists of the source area proximate to the former dry cleaning facility and an area extending off the Property to the northwest, where PCE concentrations exceeded the applicable MTCA cleanup level for groundwater (herein referred to as the Site) (Figure 2). Performance and confirmational groundwater monitoring data collected at the Site between 2003 and 2007 demonstrated that the SVE remediation system was effective in cleaning up PCE in soil and groundwater, and the prior release of PCE at the Site no longer represented a threat to human health or the environment.

Ecology (2011) reviewed the information provided in the Closure Report and issued a Property-specific NFA determination for an area that did not include the portion of the Site off the Property to the northwest (Appendix A). This area was affected by concentrations of PCE exceeding the MTCA Method A cleanup level in groundwater prior to being remediated by the SVE remediation system. Farallon understands that Ecology (2016a) limited the NFA determination to the Property,



rather than the entire Site, due to the lack of a delineation well northwest of former monitoring well MW-8, proximate to the Sammamish River (Figure 2).

The existing Property-specific NFA determination (Ecology 2011) (Appendix A) references the existence of a second MTCA site affecting the southeastern portion of the Property, referenced as Site 2 in the Property-specific NFA determination. The release at Site 2 was caused by a separate and distinct release at the up-gradient Redmond Shopping Square property owned by the City of Redmond (VCP Identification No. NW2415) (Figure 3) that formerly affected the southeastern portion of the Property. The groundwater plume associated with Site 2 was not comingled with the former groundwater plume from the Cleaning Center of Redmond site (VCP Identification No. NW1324), referenced as Site 1 in the Property-specific NFA determination. A cleanup action by excavation in conjunction with redevelopment at Site 2 resulted in Ecology issuing an opinion letter on June 20, 2012 confirming that the cleanup at the City of Redmond property met the requirements of MTCA and no further action was necessary throughout that site (Appendix A).

Based on this information and recommendation by Mr. Michael Kuntz, former Ecology Manager for the Cleaning Center of Redmond site, the owners of the Property enrolled the Property into the VCP in January 2013 to resolve the outstanding issue regarding the portion of the Site 2 plume that formerly affected the southern portion of the Property (Figure 3). A new VCP application was submitted under the site name Nelgroup Properties, LLC and assigned VCP Identification No. NW2693. Confirmational groundwater monitoring conducted between 2010 and 2014 at the Nelgroup Properties, LLC site confirmed that the groundwater plume emanating from the source at Site 2 had been cleaned up and no longer affected the Nelgroup Properties, LLC site. Ecology issued an opinion letter on August 14, 2014 for the Nelgroup Properties, LLC site VCP confirming that the cleanup met the requirements of MTCA and no further action was necessary throughout that site (Appendix A).

Site 2 and the Nelgroup Properties, LLC site will not be discussed further in this Site Closure Report Addendum, because these sites:

- No longer affect the Property;
- No longer represent a threat to human health or the environment; and
- Are entirely separate from the Site and do not comingle with the Site in any way.

1.2 REPORT ORGANIZATION

This Site Closure Report Addendum summarizes background information and provides context for a request for a Site-wide NFA determination. This report is organized into the following sections:

- **Section 1, Introduction**, presents an overview and the objective of the Site Closure Report Addendum.



- **Section 2, Background**, provides a description of the Site features; Site geology and hydrogeology; a summary of previous investigations and the cleanup action; and the regulatory status of the Site.
- **Section 3, Technical Components of Cleanup Action**, presents a summary of technical elements associated with the cleanup action completed.
- **Section 4, Conclusions and Request for NFA Determination**, presents Farallon's conclusions and a request for a Site-wide NFA determination.
- **Section 5, References**, lists the documents cited in this Site Closure Report Addendum.
- **Section 7, Limitations**, presents Farallon's standard limitations.



2.0 BACKGROUND

The following is a discussion of the background for the Site, including a description of the Property and the Site, the geology and hydrogeology of the Site, a summary of previous investigations and the completed cleanup action, and the regulatory status of the Site.

2.1 PROPERTY AND SITE DESCRIPTION

The Property is located at 15796 Redmond Way in Redmond, Washington and includes three single-story, commercial buildings of masonry construction (Figure 2). According to King County Tax Assessor records, the northern commercial building was constructed in various stages from 1966 through the early 2009 (King County Department of Assessments 2017). Several remodels and additions have occurred since the early 1980s, the most recent of which is a significant expansion near the eastern end of the northern commercial building in 2009. Asphalt-paved parking areas with landscaping strips are north and south of the northern commercial building. The southeastern commercial building is approximately 13,203 square feet in area and was constructed in 2009. The southeastern commercial building is occupied by a bank and restaurants. The south-central commercial building is 1,496 square feet in area and was constructed in 2005. The south-central commercial building is occupied by a coffee shop. The Property is bordered to the west by 158th Avenue South, to the east by 160th Avenue Northeast, and to the south by Redmond Way Northeast. The north-adjacent property is an asphalt-paved parking lot.

The Former Cleaning Center of Redmond in the northern commercial building operated as a dry cleaning facility that used PCE in the dry cleaning process from 1990 until October 29, 2002. The dry cleaning machine that used PCE was replaced with the cleaning machine that uses an environmentally friendly dry cleaning chemical around that time. The current dry cleaning facility operates as a “green” dry cleaning facility or as a dry cleaning drop-off facility.

According to the U.S. Geological Survey (2014) topographic map of Kirkland, Washington dated 2014, the Site is at an elevation of approximately 40 feet above mean sea level and is relatively flat. Regional topography in the vicinity slopes down to the west. The Sammamish River is approximately 600 feet west of the Property. The Site extends northwest toward the Sammamish River from the source area at the Former Cleaning Center of Redmond facility on the Property (Figure 2).

2.2 GEOLOGY AND HYDROGEOLOGY

The Puget Sound region is underlain by Quaternary sediments deposited during glacial episodes (Galster and Laprade 1991). Deposition occurred during a number of glacial advances and retreats, which created the existing subsurface conditions. The regional sediments consist primarily of interlayered and/or sequential deposits of alluvial clays, silts, and sands that typically are situated over deposits of glacial till that consist of silty sand to sandy silt with gravel. Outwash sediments consisting of sands, silts, clays, and gravels were deposited by rivers, streams, and post-glacial



lakes during the glacial retreats. With the exception of the most recent recessional deposits, the outwash sediments have been over-consolidated by the overriding ice sheets.

Shallow soil encountered during Farallon's subsurface investigation activities in the vicinity of the Site consisted primarily of sand and gravel, with the exception of soil encountered northwest of the northern commercial building. The shallow soil at this location included a layer of silt and peat from approximately 2.5 to 8 feet below ground surface (bgs). Underlying the silt and peat was sand and gravel consistent with the other boring locations.

The shallow aquifer is unconfined and extends to a minimum depth of 70 feet bgs at the Site, based on Farallon's deep boring assessment conducted in August 2006. Groundwater levels measured at the Site on May 15, 2007 ranged from 9.62 to 11.99 feet below the top of the well casings. During the 13 monitoring events conducted by Farallon since 2000, the estimated groundwater flow direction consistently has been to the northwest toward the Sammamish River, similar to the estimated groundwater flow direction depicted on Figures 2 and 3. Groundwater elevations calculated from the monitoring well gauging data indicate that the potentiometric surface of the unconfined aquifer is at a similar elevation as the surface of the Sammamish River, suggesting that they are hydrologically connected (Figure 4).

2.3 PREVIOUS INVESTIGATIONS AND CLEANUP ACTION

Alisto Engineering Group (1999) performed fieldwork at the Site in 1999 to assess whether a release of PCE from operations at the Former Cleaning Center of Redmond facility may have occurred. The assessment involved drilling four borings in the vicinity of the Former Cleaning Center of Redmond dry cleaning machine to collect soil samples for laboratory analysis. A reconnaissance groundwater sample also was collected from one of the borings. The results of the assessment indicated that concentrations of PCE in soil and groundwater and concentrations of TCE in groundwater at the Site exceeded the MTCA Method A cleanup levels for soil and groundwater. The presence of PCE and TCE was attributed to releases from dry cleaning operations at the Former Cleaning Center of Redmond facility.

GeoEngineers, Inc. (2001) conducted a Phase II Environmental Site Assessment at the Site in 2000 to further delineate the vertical and lateral extent of PCE exceeding the MTCA Method A cleanup levels in soil and groundwater. The Phase II Environmental Site Assessment involved drilling 11 borings to collect soil and reconnaissance groundwater samples, and installing monitoring wells MW-1 through MW-8. PCE was detected at concentrations exceeding 0.5 milligrams per kilogram in soil samples collected from two borings south and east of the Former Cleaning Center of Redmond dry cleaning machine. The data provided in the Phase II Environmental Site Assessment (GeoEngineers, Inc. 2001) bounded the distribution of PCE in groundwater to the north-northeast, south, and west.

Farallon began monitoring groundwater conditions at the Site in December 2000 to document the trend of PCE concentrations over time, and to assess whether concentrations of PCE would decrease to less than MTCA Method A cleanup levels through natural attenuation within a



reasonable restoration time frame (Tables 1 and 2). In 2003, monitoring wells MW-4 and MW-6 were decommissioned due to expansion of the northern commercial building, and monitoring well MW-9 was installed proximate to the confirmed PCE source to replace monitoring well MW-4. Farallon conducted a total of 13 groundwater monitoring events between December 2000 and May 2007.

Farallon installed an SVE well through the concrete slab inside the Former Cleaning Center of Redmond in August 2003. The SVE well was installed to facilitate operation of an SVE system to remove concentrations of PCE in soil at the source area proximate to the former location of the dry cleaning machine. It was anticipated that operation of the SVE system would eliminate or sufficiently decrease the flux of PCE from the source in the vadose (unsaturated) zone to groundwater, making active remediation of groundwater contamination unnecessary. Concentrations of PCE in groundwater declined during the 3-year operation of the SVE system, which commenced in August 2003 and ended in August 2006.

Farallon (2006a) conducted an assessment of deep groundwater quality in August 2006 that was performed in response to a letter from Ecology (2006) that stated “the vertical extent of contamination, in particular tetrachloroethene, in groundwater above the cleanup level(s) has not been determined,” among other opinions. The assessment of deep groundwater quality included collection of reconnaissance groundwater samples from hollow-stem auger boring FB-1, which was advanced to a depth of 70 feet bgs down-gradient of monitoring well MW-7 (Figures 2 and 4). Reconnaissance groundwater samples were collected from boring FB-1 at 12.5, 31.5, and 68.5 feet bgs during drilling. The analytical results for PCE in all three of the reconnaissance groundwater samples collected were less than the MTCA Method A cleanup level of 5 micrograms per liter ($\mu\text{g/l}$) for PCE, indicating that concentrations of PCE in groundwater attenuated with depth (Figure 4).

In accordance with the agreement with Ecology, Farallon (2006b) advanced additional borings proximate to the former dry cleaning machine, collected indoor air samples from the nearest tenant space down-gradient of the Former Cleaning Center of Redmond facility, and conducted confirmation groundwater monitoring. Confirmation soil sampling was conducted by Farallon in June 2007. According to laboratory analytical results, PCE was present at concentrations less than the MTCA cleanup level in soil at the Site.

Four quarters of confirmation groundwater monitoring were completed at monitoring wells MW-1 through MW-3, MW-7, and MW-9 in August and November 2006, and in February and May 2007. Confirmation groundwater monitoring at monitoring well MW-8, proximate to the Sammamish River, had previously been completed from June 2001 through August 2004. The estimated direction of groundwater flow was consistently to the northwest during confirmation groundwater monitoring events, consistent with prior monitoring events at the Site. PCE was not detected at concentrations exceeding the MTCA Method A cleanup level of 5 $\mu\text{g/l}$ in confirmation groundwater samples collected from the Site. Upon receipt of the NFA determination, the monitoring wells were decommissioned between March 2012 and September 2014.



Vapor intrusion assessments were conducted in June 2007 and June 2010 as part of the remedial investigation and regulatory closure activities, respectively, at the Property and again in March 2014 as a condition of the Property-specific NFA determination. Results of these assessments demonstrated that residual concentrations of PCE in the subsurface are protective of commercial workers and meet MTCA cleanup standards for protection of human health and the environment.

2.4 REGULATORY STATUS

As discussed, Ecology issued a Property-specific NFA determination for a portion of the Site on April 1, 2011. The Property-specific NFA determination did not include a portion of the Site northwest of the Property (Appendix A). Farallon understands that Ecology limited the NFA determination to the Property because there was no down-gradient point of compliance delineating the groundwater plume northwest of former monitoring well MW-8, proximate to the Sammamish River. Monitoring well MW-8 was installed along the centerline of the groundwater plume at the most down-gradient location accessible to install a monitoring well. This location is immediately up-gradient of the Sammamish River, approximately 70 feet from the river's edge and approximately 50 feet from the top of the river bank (Figures 2 and 4). The asphalt-paved Sammamish River pedestrian trail, approximately 20 feet west of former monitoring well MW-8, lies between the top of the river bank and former monitoring well MW-8. King County owns the land, including the Sammamish River pedestrian trail and the location of former monitoring well MW-8, which was installed pursuant to an access agreement with King County. It was not practicable to install an additional monitoring well down-gradient of former monitoring well MW-8 for the following reasons:

- Drilling on the river bank is not possible due to a steep slope and the presence of rip-rap boulders, and because it is an environmentally sensitive area;
- Drilling on top of or proximate to the Sammamish River Trail would have necessitated closure of the trail to pedestrian traffic and was not allowed by the property owner, King County; and
- The only location closer to the Sammamish River than former monitoring well MW-8 that could be drilled along the flow path was only 10 to 15 feet further northwest of the former location of monitoring well MW-8. This location, proximate to former monitoring well MW-8, would not provide any meaningful data to define the northwesterly extent of the former PCE plume in groundwater.

Farallon (2006a) provided vertical delineation of the plume depth using reconnaissance groundwater samples from deep boring FB-1, advanced in August 2006. This vertical delineation established that concentrations of PCE exceeding the MTCA Method A cleanup level were limited to the uppermost portion of the shallow water-bearing zone. Based on groundwater level elevations and estimated flow direction, the shallow water-bearing zone discharges to the Sammamish River (Figures 2 and 4). Figures depicting the plume footprint prior to implementation of the cleanup action showed the plume extending slightly beyond former monitoring well MW-8 to the vicinity of the eastern bank of the Sammamish River. These figures



accurately represent the down-gradient extent of the plume as it is not technically possible for the plume to migrate past the discharge point (the eastern bank and base of the Sammamish River) (Figure 4). Installation of a monitoring well down-gradient of former monitoring well MW-8 prior to implementation of the cleanup action was not practicable or technically necessary.



3.0 TECHNICAL COMPONENTS OF CLEANUP ACTION

Farallon previously established the MTCA Method A cleanup levels for unrestricted land use as the cleanup levels for PCE at the Cleaning Center of Redmond Site. Due to the proximity of the northwestern portion of the Site to the Sammamish River, Farallon recommends the use of Washington State Surface Water Quality Criteria (Table 240 of WAC 173-201A-240, updated August 2016) as the basis for the groundwater cleanup level at the Site to protect the designated/beneficial uses of the surface water. No freshwater aquatic life water quality criteria have been established for PCE, so human health criteria for the consumption of water and aquatic organisms will be used. The water quality criterion for PCE in Table 240 of WAC 173-201A-240 is more stringent than the MTCA Method A cleanup level. The selected groundwater cleanup level for PCE is 4.9 µg/l (Table 240, WAC 173-201A-240).

The groundwater plume at the Site was delineated to the extent practicable per the discussion in Section 2.4, Regulatory Status. COC concentrations in groundwater across the former monitoring well network at the Site decreased to less than the proposed cleanup levels established in this Site Closure Report Addendum after initiation of the cleanup action, which took place from August 2003 through August 2006 (Table 2). Linear regression trends for PCE concentrations in groundwater versus time for former source area monitoring well MW-9 and former down-gradient monitoring wells MW-7 and MW-8 between the source area and the Sammamish River are provided in Appendix D. The linear regression trend lines for former monitoring wells MW-7 through MW-9 each indicate a decreasing trend in PCE concentrations in groundwater. In addition, PCE concentrations detected in groundwater samples collected from the former monitoring well network during the groundwater compliance monitoring period in 2006 and 2007 demonstrated that PCE concentrations remained stable and less than applicable cleanup levels after the SVE remediation system ceased operation.

To address Ecology's concerns regarding delineation between former monitoring well MW-8 and the Sammamish River, Farallon requests approval of a conditional point of compliance (CPOC) at the location of former monitoring well MW-8 in accordance with WAC 173-340-720(8)(d)(ii) and the Ecology Memorandum, to facilitate issuance of a Site-wide NFA determination. CPOC example 5b on page 14 of the Ecology Memorandum for a source property near, but not abutting, a surface water closely resembles Site conditions. The CPOC at former monitoring well MW-8 is appropriate based on the flow chart for setting points of compliance provided as Figure 6 in the Ecology Memorandum. A summary of Farallon's evaluation of this CPOC using the flow chart in the Ecology Memorandum is included below:

- *Practicable to meet cleanup levels throughout the site within reasonable restoration time frame?* Unknown; Site characterization was not considered complete by Ecology due to the lack of a delineation well northwest of former monitoring well MW-8, proximate to the Sammamish River. The Site area at and up-gradient of monitoring well MW-8 did meet cleanup levels within a reasonable restoration time frame. Concentrations of PCE in groundwater down-gradient of monitoring well MW-8 were not characterized for the reasons identified in Section 4.0, Conclusions and Request for NFA Determination.



- *Practicable to meet cleanup levels within property boundary within reasonable restoration time frame?* Unknown at the time when PCE contamination in groundwater extended off the Property to former monitoring well MW-8. The cleanup action at the Site ultimately reduced the concentrations of PCE in groundwater to concentrations less than applicable MTCA cleanup levels.
- *Is there area-wide groundwater contamination?* Not at concentrations exceeding MTCA Method A cleanup levels. There is an area-wide plume of PCE in groundwater at concentrations that are less than the MTCA Method A cleanup level and the surface water criterion. This area-wide plume emanates from sources up-gradient of the Site.
- *Is the contaminated groundwater discharging, or likely to discharge to surface water?* Undetermined at the time when the PCE plume in groundwater existed. It is possible that PCE-contaminated groundwater could have discharged to surface water prior to the cleanup action conducted at the Site. The cleanup action reduced PCE concentrations in groundwater to less than applicable cleanup levels established in this Site Closure Report Addendum.
- *Does the source property abut surface water?* No.
- *Is the source property near surface water?* Yes, the source Property is near, but does not abut, surface water.
- *Does the Site meet the conditions in WAC 173-340§720(8)(d)(ii)?* Yes, the Site meets the conditions in WAC 173-340§720(8)(d)(ii). The use of surface water quality criteria as groundwater cleanup levels, where available, protects the designated/beneficial use of the surface water.
- *Does groundwater meet cleanup levels before discharging to surface water?* It is unclear if PCE concentrations in groundwater discharging to the Sammamish River were less than applicable cleanup levels when the PCE plume in groundwater existed prior to initiation of the cleanup action. PCE concentrations could not be assessed between former monitoring well MW-8 and the Sammamish River due to access limitations. After the cleanup action was initiated, PCE concentrations in groundwater declined to less than the applicable MTCA cleanup levels prior to discharge into the surface water; therefore, PCE associated with the Site currently does not discharge to the Sammamish River.

Farallon requests approval of a CPOC at former monitoring well MW-8 based on the above review of the applicability of implementation of the CPOC. Concentrations of PCE in groundwater at former monitoring well MW-8 were less than the cleanup level established in this Site Closure Report Addendum for 3 years (June 2001 through August 2004) prior to discontinuation of sampling at that monitoring well. In addition, concentrations of PCE in groundwater remained less than applicable cleanup levels for 4 years (November 2003 through May 2007) at down-gradient monitoring well MW-7 closer to the former source, which includes a monitoring period that extends 3 years beyond the discontinuation of sampling at former monitoring well MW-8. In addition, concentrations of PCE in groundwater remained less than applicable cleanup levels at all



other monitoring wells associated with the Site for a minimum of four quarters. These data support Farallon's assertion that the cleanup action was successful in remediating the PCE plume in groundwater across the entire Site and that cleanup levels were achieved at the CPOC.



4.0 CONCLUSIONS AND REQUEST FOR NFA DETERMINATION

The cleanup action successfully remediated each medium of concern across the Site. Ecology issued a Property-specific NFA determination in April 2011 that did not include the portion of the Site outside the Property boundaries to the northwest. It is Farallon's understanding that a Site-wide NFA determination was not issued due to the lack of a down-gradient delineation well between former monitoring well MW-8 and the Sammamish River. It was not practicable or necessary to install an additional monitoring well between former monitoring well MW-8 and the Sammamish River for the following reasons:

- Drilling on the river bank is not possible due to a steep slope and the presence of rip-rap boulders, and because it is an environmentally sensitive area.
- Drilling on top of or proximate to the Sammamish River Trail would have necessitated closure of the trail to pedestrian traffic and was not allowed by the property owner, King County.
- The only location closer to the river than former monitoring well MW-8 that could be drilled along the flow path was only 10 to 15 feet further northwest of the location of former monitoring well MW-8. This location, proximate to former monitoring well MW-8, would not provide any meaningful data to define the northwesterly extent of the former plume.
- The shallow water-bearing zone, where the PCE plume was located, discharges to the Sammamish River and it is not technically possible for the plume to migrate past the discharge point (the eastern bank and base of the Sammamish River) (Figure 4).

Farallon proposes the use of a CPOC at the location of former monitoring well MW-8 to address Ecology's concern regarding the delineation of the PCE plume in groundwater between former monitoring well MW-8 and the Sammamish River. Implementation of a CPOC is appropriate based on review of the Ecology Memorandum that includes a flow chart for setting points of compliance.

Concentrations of PCE in groundwater at CPOC monitoring well MW-8 were less than the cleanup level established in this Site Closure Report Addendum (4.9 µg/l) for 3 years (June 2001 through August 2004) prior to discontinuation of sampling at that monitoring well. In addition, concentrations of PCE in groundwater remained less than applicable cleanup levels at all other monitoring wells associated with the Site for a minimum of four quarters. These data support Farallon's assertion that the cleanup action was successful in remediating the PCE plume in groundwater across the entire Site and that applicable groundwater cleanup levels were met at the selected CPOC. Based on the information provided in the Closure Report and this Site Closure Report Addendum, Farallon respectfully requests a Site-wide NFA determination and that the Site be removed from Ecology's Hazardous Waste Sites List.



5.0 REFERENCES

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6.0 LIMITATIONS

6.1 GENERAL LIMITATIONS

The conclusions contained in this report/assessment are based on professional opinions with regard to the subject matter. These opinions have been arrived at in accordance with currently accepted hydrogeologic and engineering standards and practices applicable to this location. The conclusions contained herein are subject to the following inherent limitations:

- **Accuracy of Information.** Farallon obtained, reviewed, and evaluated certain information used in this report/assessment from sources that were believed to be reliable. Farallon's conclusions, opinions, and recommendations are based in part on such information. Farallon's services did not include verification of its accuracy or authenticity. Should the information upon which Farallon relied prove to be inaccurate or unreliable, Farallon reserves the right to amend or revise its conclusions, opinions, and/or recommendations.
- **Reconnaissance and/or Characterization.** Farallon performed a reconnaissance and/or characterization of the Site that is the subject of this report/assessment to document current conditions. Farallon focused on areas deemed more likely to exhibit hazardous materials conditions. Contamination may exist in other areas of the Site that were not investigated or were inaccessible. Site activities beyond Farallon's control could change at any time after the completion of this report/assessment.

For the foregoing reasons, Farallon cannot and does not warrant or guarantee that the Site is free of hazardous or potentially hazardous substances or conditions, or that latent or undiscovered conditions will not become evident in the future. Farallon's observations, findings, and opinions can be considered valid only as of the date of the report hereof.

This report/assessment has been prepared in accordance with the contract for services between Farallon and Nelgroup Properties LLC, and currently accepted industry standards. No other warranties, representations, or certifications are made.

6.2 LIMITATION ON RELIANCE BY THIRD PARTIES

Reliance by third parties is prohibited. This report/assessment has been prepared for the exclusive use of Nelgroup Properties LLC to address the unique needs of Nelgroup Properties LLC at the Site at a specific point in time. Services have been provided to Nelgroup Properties LLC in accordance with a contract for services between Farallon and Nelgroup Properties LLC, and generally accepted environmental practices for the subject matter at the time this report was prepared.

No other party may rely on this report unless Farallon agrees in advance to such reliance in writing. Any use, interpretation, or reliance upon this report/assessment by anyone other than Nelgroup Properties LLC is at the sole risk of that party, and Farallon will have no liability for such unauthorized use, interpretation, or reliance.



Do not rely on this report/assessment if:

- It was not prepared for you;
- It was not prepared for your project;
- It was not prepared for your specific Site; or
- It was not prepared under an approved scope of work for which you are under contract with Farallon.

FIGURES

SITE CLOSURE REPORT ADDENDUM
Former Cleaning Center of Redmond
15796 Redmond Way
Redmond, Washington

Farallon PN: 650-001



Washington
Issaquah | Bellingham | Seattle

Oregon
Portland | Bend | Baker City

California
Oakland | Sacramento | Irvine

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FIGURE 1
SITE VICINITY MAP
CLEANING CENTER OF REDMOND
REDMOND, WASHINGTON

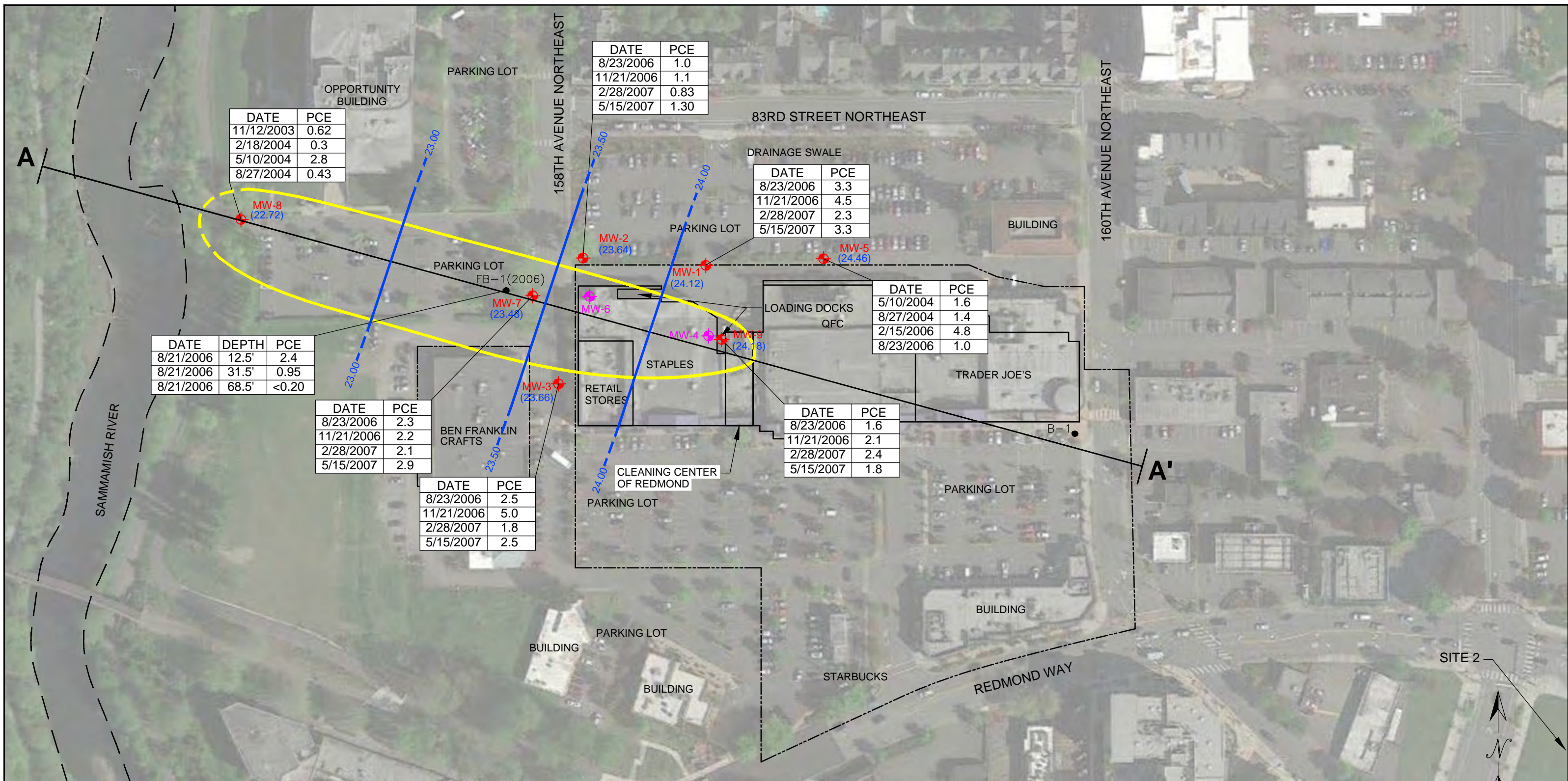
Drawn By: DEW

Checked By: JM

Date: 3/8/2017

Disk Reference: 650-001_00

FARALLON PN: 650-001



DATE	PCE
11/12/2003	0.62
2/18/2004	0.3
5/10/2004	2.8
8/27/2004	0.43

DATE	PCE
8/23/2006	1.0
11/21/2006	1.1
2/28/2007	0.83
5/15/2007	1.30

DATE	PCE
8/23/2006	3.3
11/21/2006	4.5
2/28/2007	2.3
5/15/2007	3.3

DATE	PCE
5/10/2004	1.6
8/27/2004	1.4
2/15/2006	4.8
8/23/2006	1.0

DATE	DEPTH	PCE
8/21/2006	12.5'	2.4
8/21/2006	31.5'	0.95
8/21/2006	68.5'	<0.20

DATE	PCE
8/23/2006	2.3
11/21/2006	2.2
2/28/2007	2.1
5/15/2007	2.9

DATE	PCE
8/23/2006	2.5
11/21/2006	5.0
2/28/2007	1.8
5/15/2007	2.5

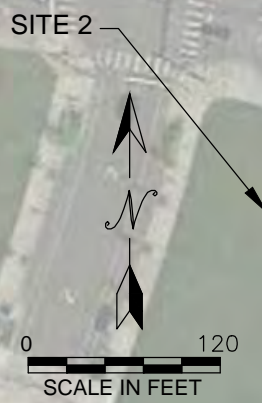
DATE	PCE
8/23/2006	1.6
11/21/2006	2.1
2/28/2007	2.4
5/15/2007	1.8

LEGEND

- PROPERTY BOUNDARY
- FORMER EXTENT OF PCE PLUME IN GROUNDWATER (SITE 1)
- PERFORMANCE AND CONFIRMATION MONITORING WELL NETWORK (DECOMMISSIONED FOLLOWING RECEIPT OF NO FURTHER ACTION DETERMINATION)
- MONITORING WELL (DECOMMISSIONED PRIOR TO CLEANUP DUE TO CONSTRUCTION OF NEW BUILDING)
- BORING LOCATION
- GROUNDWATER ELEVATION RELATIVE TO MEAN SEA LEVEL (MAY 2007)
- GROUNDWATER ELEVATION CONTOUR (MAY 2007)
- APPROXIMATE DIRECTION OF GROUNDWATER FLOW

DEPTH IN FEET BELOW GROUND SURFACE
 PCE = TETRACHLOROETHENE
BOLD = INDICATE CONCENTRATIONS EXCEEDED WASHINGTON STATE MODEL TOXICS CONTROL ACT CLEANUP REGULATIONS (MTCA) METHOD A CLEANUP LEVEL
 < = INDICATES ANALYTE NOT DETECTED AT CONCENTRATIONS AT OR EXCEEDING THE LABORATORY PRACTICAL QUANTITATION LIMIT
 = DATE SAMPLED AND PCE CONCENTRATION IN GROUNDWATER IN MICROGRAMS PER LITER (ug/L)
 ALL LOCATIONS ARE APPROXIMATE

DATE	PCE
8/23/2006	1.6



Washington
Issaquah | Bellingham | Seattle

Oregon
Portland | Bend | Baker City

California
Oakland | Sacramento | Irvine

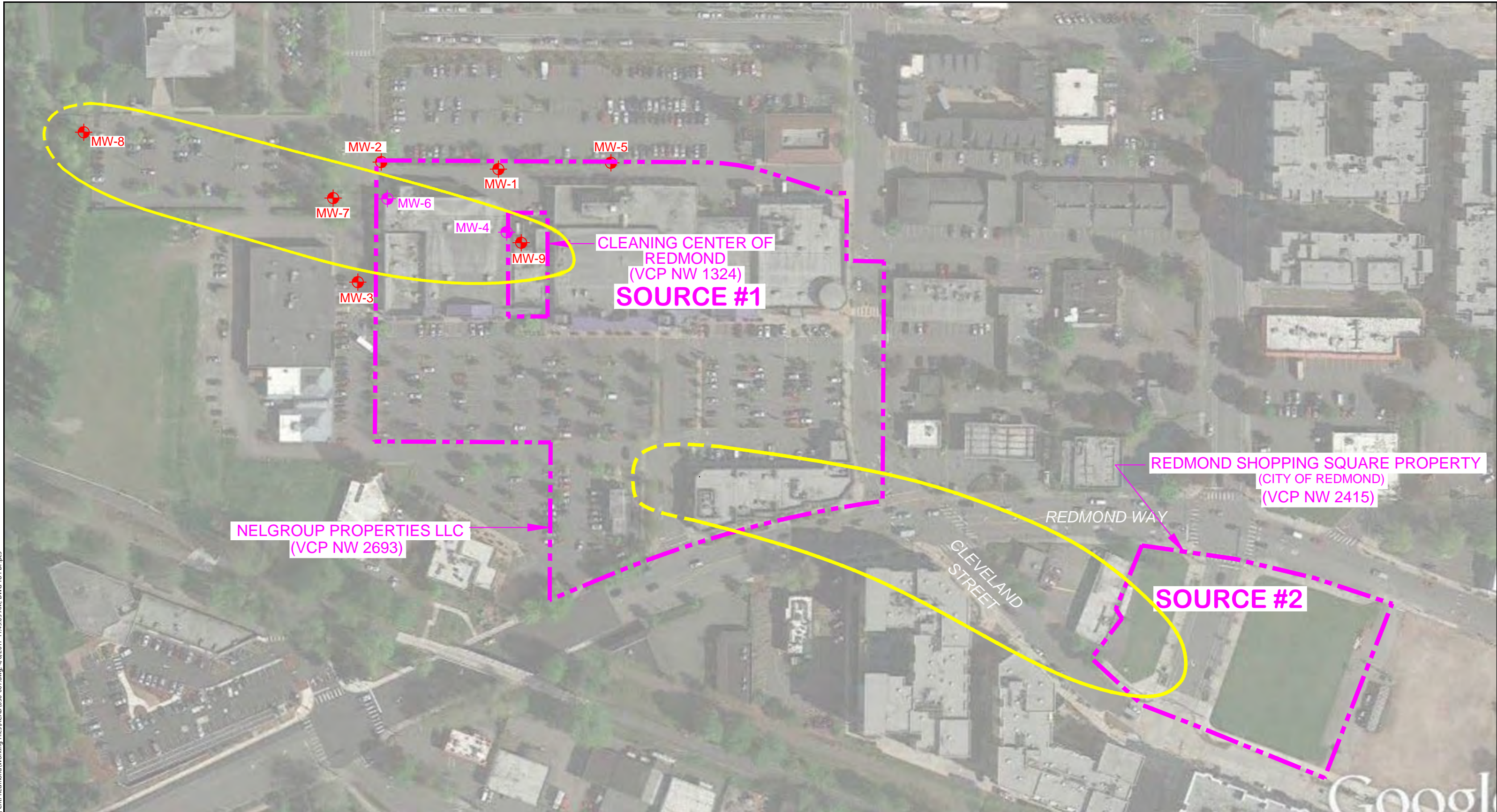
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FIGURE 2


GROUNDWATER ELEVATION CONTOURS AND PCE CONCENTRATIONS IN GROUNDWATER
 CLEANING CENTER OF REDMOND
 REDMOND, WASHINGTON

FARALLON PN: 650-001

Drawn By: JM Checked By: MB Date: 3/8/2017 Disk Reference: 650-001_00.dwg



- LEGEND**
-  PERFORMANCE AND CONFIRMATION MONITORING WELL NETWORK (DECOMMISSIONED FOLLOWING RECEIPT OF NO FURTHER ACTION DETERMINATION)
 -  MONITORING WELL (DECOMMISSIONED PRIOR TO CLEANUP DUE TO CONSTRUCTION OF NEW BUILDING)

 FORMER EXTENT OF TETRACHLORETHENE PLUMES IN GROUNDWATER (DASHED WHERE INFERRED)

ALL LOCATIONS ARE APPROXIMATE




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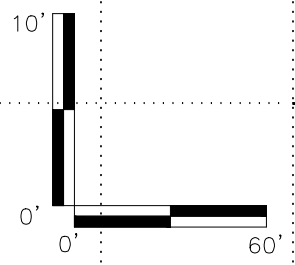
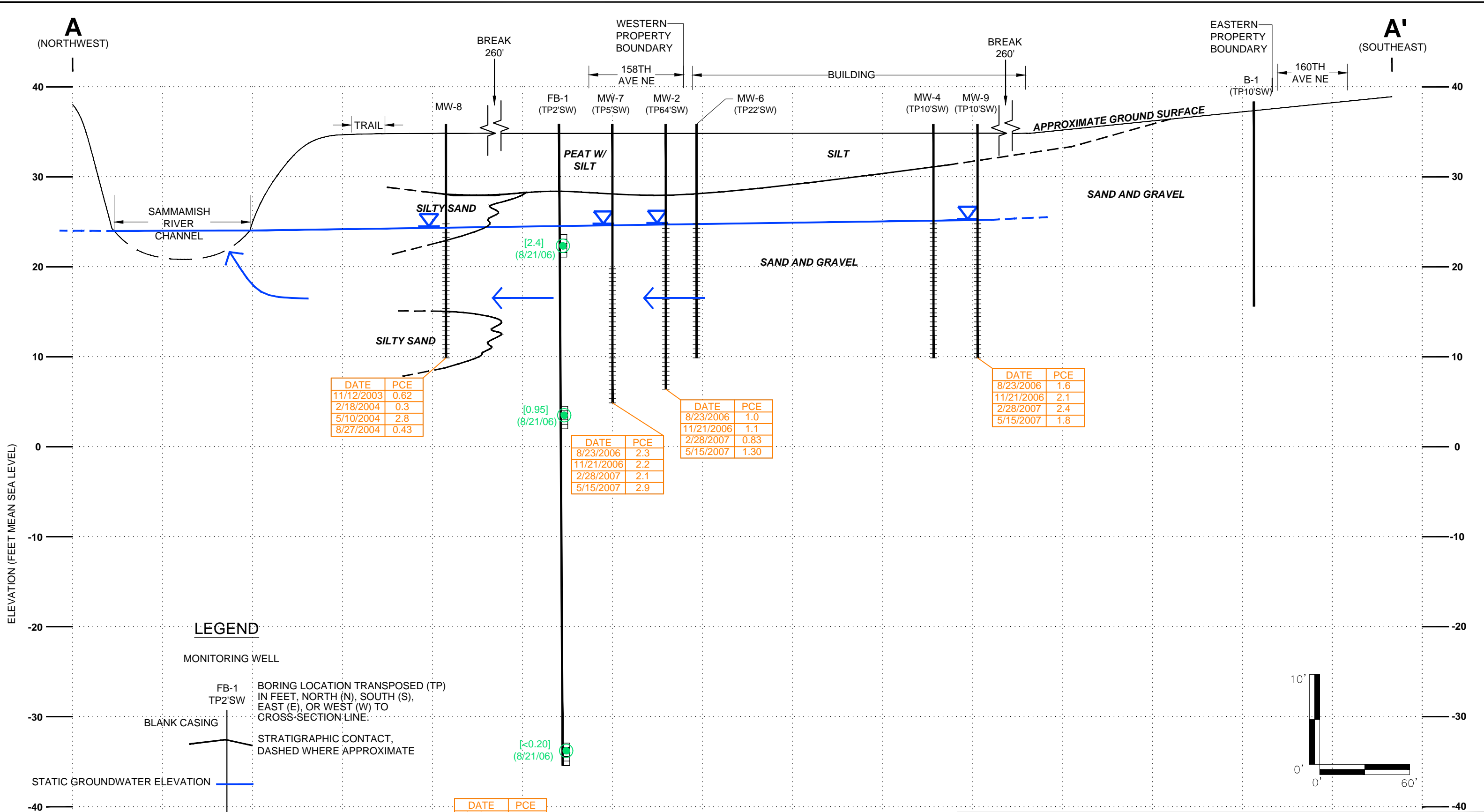
Drawn By: DEW Checked By: CS

FIGURE 3
FORMER EXTENT OF SITES
REDMOND, WASHINGTON

FARALLON PN: 650-007

Date: 4/6/2016 Disk Reference: 650-007.dwg

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FIGURE 4
 CROSS SECTION A-A'
 CLEANING CENTER OF REDMOND
 REDMOND, WASHINGTON

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TABLES

SITE CLOSURE REPORT ADDENDUM
Former Cleaning Center of Redmond
15796 Redmond Way
Redmond, Washington

Farallon PN: 650-001

Table 1
Summary of Groundwater Elevations
Cleaning Center of Redmond
Redmond, Washington
Farallon PN: 650-001

Well Identification	Date	Top of Well Casing Elevation (feet)	Depth to Water (feet) ¹	Groundwater Elevation (feet)
MW-1	12/20/2000	34.95 ²	11.1	23.85
	6/6/2001		10.47	24.48
	6/28/2002		11.51	23.44
	8/13/2003		12.33	22.62
	11/12/2003		10.58	24.37
	2/18/2004		8.71	26.24
	5/10/2004		11.43	23.52
	8/27/2004		11.26	23.69
	2/15/2006		8.37	26.58
	8/23/2006		12.73	22.22
	11/21/2006		6.71	28.24
	2/28/2007		9.81	25.14
5/15/2007	10.83	24.12		
MW-2	12/20/2000	35.63 ²	12.07	23.56
	6/6/2001		11.43	24.2
	6/28/2002		12.58	23.05
	8/13/2003		13.27	22.36
	11/12/2003		11.65	23.98
	2/18/2004		9.95	25.68
	5/10/2004		12.47	23.16
	8/27/2004		12.11	23.52
	2/15/2006		9.60	26.03
	8/23/2006		12.72	22.91
	11/21/2006		7.49	28.14
	2/28/2007		10.91	24.72
5/15/2007	11.99	23.64		
MW-3	12/20/2000	33.28 ²	9.7	23.58
	6/6/2001		9.08	24.2
	6/28/2002		10.22	23.06
	8/13/2003		10.88	22.4
	11/12/2003		9.31	23.97
	2/18/2004		7.59	25.69
	5/10/2004		10.1	23.18
	8/27/2004		9.73	23.55
	2/15/2006		7.25	26.03
	8/23/2006		10.37	22.91
	11/21/2006		5.11	28.17
	2/28/2007		8.51	24.77
5/15/2007	9.62	23.66		

Table 1
Summary of Groundwater Elevations
Cleaning Center of Redmond
Redmond, Washington
Farallon PN: 650-001

Well Identification	Date	Top of Well Casing Elevation (feet)	Depth to Water (feet) ¹	Groundwater Elevation (feet)
MW-4	12/20/2000	98.82 ³	9.71	89.11
	6/6/2001		9.18	89.64
	6/28/2002		10.26	88.56
	8/13/2003		Well decommissioned.	
MW-5	12/20/2000	36.19 ²	11.97	24.22
	6/6/2001		11.47	24.72
	6/28/2002		12.52	23.67
	8/13/2003		13.41	22.78
	11/12/2003		11.47	24.72
	2/18/2004		9.46	26.73
	5/10/2004		12.41	23.78
	8/27/2004		12.41	23.78
	2/15/2006		9.18	27.01
	8/23/2006		12.73	23.46
	11/21/2006		7.92	28.27
	2/28/2007		10.75	25.44
	5/15/2007		11.73	24.46
MW-6	12/20/2000	98.52 ³	9.81	88.71
	6/6/2001		9.19	89.33
	6/28/2002		10.33	88.19
	8/13/2003		Well decommissioned.	
MW-7	12/20/2000	33.16 ²	9.7	23.46
	6/6/2001		9.02	24.14
	6/28/2002		10.21	22.95
	8/13/2003		10.85	22.31
	11/12/2003		9.32	23.84
	2/18/2004		7.68	25.48
	5/10/2004		10.07	23.09
	8/30/2004		9.72	23.44
	2/15/2006		7.31	25.85
	8/23/2006		10.35	22.81
	11/21/2006		5.02	28.14
	2/28/2007		8.54	24.62
	5/15/2007		9.68	23.48

Table 1
Summary of Groundwater Elevations
Cleaning Center of Redmond
Redmond, Washington
Farallon PN: 650-001

Well Identification	Date	Top of Well Casing Elevation (feet)	Depth to Water (feet) ¹	Groundwater Elevation (feet)
MW-8	12/20/2000	33.98 ²	11.12	22.86
	6/6/2001		10.34	23.64
	6/28/2002		11.61	22.37
	8/13/2003		12.1	21.88
	11/12/2003		10.82	23.16
	2/18/2004		9.42	24.56
	5/10/2004		11.51	22.47
	8/27/2004		10.79	23.19
	2/15/2006		9.02	24.96
	8/23/2006		11.69	22.29
	11/21/2006		5.98	28.00
	2/28/2007		10.06	23.92
5/15/2007	11.26	22.72		
MW-9 ⁴	8/13/2003	34.00 ²	11.38	22.62
	11/12/2003		9.6	24.4
	2/18/2004		7.72	26.28
	5/10/2004		10.46	23.54
	8/27/2004		10.28	23.72
	2/15/2006		7.36	26.64
	8/23/2006		10.72	23.28
	11/21/2006		5.72	28.28
	2/28/2007		8.79	25.21
	5/15/2007		9.82	24.18

NOTES:

— = not applicable

¹ In feet below top of casing.

² In feet above mean sea level.

³ Relative to an on-site datum of 100 feet.

⁴ Well installed on November 19, 2002.

Table 2
Summary of Groundwater Sample Analytical Results - PCE
Cleaning Center of Redmond
Redmond, Washington
Farallon PN: 650-001

Well/Sample Identification	Date Sampled	Sample Collected By	Analytical Results (micrograms per liter) ¹
			Tetrachloroethene
MW-1	3/6/2000	GeoEngineers	1.6
	8/8/2000	GeoEngineers	5.4
	12/20/2000	Farallon	2.7
	6/6/2001	Farallon	1.3
	6/28/2002	Farallon	2.1
	8/13/2003	Farallon	1.2
	11/12/2003	Farallon	3.3
	2/18/2004	Farallon	2.9
	5/10/2004	Farallon	4.0
	8/27/2004	Farallon	8.5
	2/15/2006	Farallon	2.4
	8/23/2006	Farallon	3.3
	11/21/2006	Farallon	4.5
	2/28/2007	Farallon	2.3
5/15/2007	Farallon	3.3	
MW-2	3/6/2000	GeoEngineers	<1.0
	8/8/2000	GeoEngineers	2.9
	12/20/2000	Farallon	2.9
	6/6/2001	Farallon	1.9
	6/28/2002	Farallon	0.81
	8/13/2003	Farallon	0.99
	11/12/2003	Farallon	0.66
	2/18/2004	Farallon	0.88
	5/10/2004	Farallon	0.54
	8/27/2004	Farallon	0.56
	2/15/2006	Farallon	1.1
	8/23/2006	Farallon	1.0
	11/21/2006	Farallon	1.1
	2/28/2007	Farallon	0.83
5/15/2007	Farallon	1.30	
MW-3	3/6/2000	GeoEngineers	<1.0
	8/8/2000	GeoEngineers	<1.0
	12/20/2000	Farallon	0.34
	6/6/2001	Farallon	2.0
	6/28/2002	Farallon	2.0
	8/13/2003	Farallon	7.3
	11/12/2003	Farallon	4.5
	2/18/2004	Farallon	2.8
	5/10/2004	Farallon	3.5
	8/27/2004	Farallon	6.7
	2/15/2006	Farallon	2.1
	8/23/2006	Farallon	2.5
	11/21/2006	Farallon	5.0
	2/28/2007	Farallon	1.8
5/15/2007	Farallon	2.5	
MTCA Cleanup Level for Groundwater			4.9 ²

Table 2
Summary of Groundwater Sample Analytical Results - PCE
Cleaning Center of Redmond
Redmond, Washington
Farallon PN: 650-001

Well/Sample Identification	Date Sampled	Sample Collected By	Analytical Results (micrograms per liter) ¹
			Tetrachloroethene
MW-4	3/6/2000	GeoEngineers	50
	8/8/2000	GeoEngineers	9.2
	12/20/2000	Farallon	28
	6/6/2001	Farallon	16
	6/28/2002	Farallon	14
	Well removed in 2003 due to construction of new building		
MW-5	3/6/2000	GeoEngineers	<1.0
	8/8/2000	GeoEngineers	<1.0
	12/20/2000	Farallon	2.0
	6/6/2001	Farallon	1.7
	6/28/2002	Farallon	1.6
	8/13/2003	Farallon	0.2
	11/12/2003	Farallon	3.6
	2/18/2004	Farallon	4.8
	5/10/2004	Farallon	1.6
	8/27/2004	Farallon	1.4
	2/15/2006	Farallon	4.8
8/23/2006	Farallon	1.0	
MW-6	3/6/2000	GeoEngineers	11
	8/8/2000	GeoEngineers	27
	12/20/2000	Farallon	15
	6/6/2001	Farallon	8.6
	6/28/2002	Farallon	6.3
	Well removed in 2003 due to construction of new building		
MW-7	3/28/2000	GeoEngineers	15
	8/8/2000	GeoEngineers	14
	12/21/2000	Farallon	12
	6/6/2001	Farallon	7.6
	6/28/2002	Farallon	3.9
	8/13/2003	Farallon	5.3
	11/12/2003	Farallon	4.5
	2/18/2004	Farallon	3.6
	5/10/2004	Farallon	3.3
	8/30/2004	Farallon	3.6
	2/15/2006	Farallon	2.5
	8/23/2006	Farallon	2.3
	11/21/2006	Farallon	2.2
	2/28/2007	Farallon	2.1
5/15/2007	Farallon	2.9	
MTCA Cleanup Level for Groundwater			4.9²

Table 2
Summary of Groundwater Sample Analytical Results - PCE
Cleaning Center of Redmond
Redmond, Washington
Farallon PN: 650-001

Well/Sample Identification	Date Sampled	Sample Collected By	Analytical Results (micrograms per liter) ¹
			Tetrachloroethene
MW-8	4/14/2000	GeoEngineers	7.4
	8/8/2000	GeoEngineers	8.5
	12/20/2000	Farallon	5.7
	6/6/2001	Farallon	3.9
	6/28/2002	Farallon	4.1
	8/13/2003	Farallon	3.4
	11/12/2003	Farallon	0.62
	2/18/2004	Farallon	0.3
	5/10/2004	Farallon	2.8
MW-9	8/27/2004	Farallon	0.43
	8/13/2003	Farallon	7.4
	11/12/2003	Farallon	3.7
	2/18/2004	Farallon	2.9
	5/10/2004	Farallon	2.5
	8/27/2004	Farallon	3.0
	2/15/2006	Farallon	2.5
	8/23/2006	Farallon	1.6
	11/21/2006	Farallon	2.1
2/28/2007	Farallon	2.4	
5/15/2007	Farallon	1.8	
Reconnaissance Groundwater Samples			
FB-1-GW-12.5	8/21/2006	Farallon	2.4
FB-1-GW-31.5	8/21/2006	Farallon	0.95
FB-1-GW-68.5	8/21/2006	Farallon	<0.20
MTCA Cleanup Level for Groundwater			4.9 ²

NOTES:

Results in **bold** denote concentrations exceeding applicable cleanup levels.

< denotes analyte not detected at or exceeding the reporting limit listed.

¹ Analyzed by U.S. Environmental Protection Agency Method 8260B.

² Value from Table 240, Section 240 of the Water Quality Standards for Surface Waters of the State of Washington, as established in Chapter 173-201A of the Washington Administrative Code, as amended August 1, 2016.

Farallon = Farallon Consulting, L.L.C.

GeoEngineers = GeoEngineers, Inc.

MTCA = Washington State Model Toxics Control Act Cleanup Regulations

PCE = tetrachloroethene

TCE = trichloroethene

APPENDIX A
NFA DETERMINATION LETTERS

SITE CLOSURE REPORT ADDENDUM
Former Cleaning Center of Redmond
15796 Redmond Way
Redmond, Washington

Farallon PN: 650-001



RECEIVED

APR 05 2011

Farallon Consulting, L.L.C.

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

PO Box 47600 • Olympia, WA 98504-7600 • 360-407-6000
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

April 1, 2011

Mr. Thomas Markl
Nelson Real Estate Management, L.L.C
Post Office Box 461
Redmond, Washington 98073-0461

Re: No Further Action at a Property Associated with a Site:

- **Property Address:** Cleaning Center of Redmond -15796 Redmond Way, Redmond, WA 98052
- **Facility/Site No.:** 26296554
- **VCP Project No.:** NW1324

Dear Mr. Markl:

The Washington State Department of Ecology (Ecology or we) received your request for an opinion on your independent cleanup of a Property associated with the Cleaning Center of Redmond 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.

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.

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

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.



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 tax parcel number **7198900080** in King County, which was affected by the Site and addressed by your cleanup. The property known as the Redmond Center Property (Nelgroup Properties LLC) is affected by two releases (sources); hence, two sites.

The first release is due to historical activities associated with the Cleaning Center of Redmond and is being addressed by this property no further action (NFA) and constitutes:

- Tetrachloroethylene (PCE) in soil.
- Tetrachloroethylene (PCE) in groundwater.
- Tetrachloroethylene (PCE) and Trichloroethene (TCE) in soil vapor and indoor air.

The second release southwest of the Redmond Centre property appears to be from off-property-related historical activities from an up-gradient source associated with the Former Redmond WASH N' DRY and identified as the Redmond Shopping Square Property (city of Redmond) and is not part of this NFA.

The second release constitutes:

- Tetrachloroethylene (PCE) in groundwater.
- Tetrachloroethylene (PCE) in soil.
- Potentially, Tetrachloroethylene (PCE) in the vapor phases for both indoor and outdoor air.

Enclosure A includes a legal description of the Property. Enclosure B includes a diagram of the Site that illustrates the location of the property within the site (first release).

2. Description of the Site.

The Site is defined by the nature and extent of contamination associated with the first release as described above.

- Tetrachloroethylene (PCE) in soil.
- Tetrachloroethylene (PCE) in Ground Water.
- Tetrachloroethylene (PCE) and Trichloroethene (TCE) in soil vapor and indoor air.

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.

A report contained in Ecology files show that the Redmond Shopping Square Property (city of Redmond) historically operated a dry cleaning service identified as the Wash N' Dry facility (See Enclosure C-1). Data shows that this facility is currently undergoing an independent cleanup of the PCE impacts to the soil and groundwater at that location. The Wash N' Dry cleaner facility located up-gradient, along a southwesterly groundwater flow is identified as the potential source impacting the Redmond Center Property (Nelgroup Properties LLC), identified in this letter as the second site (See Enclosure C-2). The Wash N' Dry facility is located at 16101 through 16149 Redmond Way. Please refer to Enclosure C-1 for locations of the two properties noted above and to Enclosure C-2 for the locations of the two sites (PCE plumes in the groundwater) located within the Redmond Center Property (Nelgroup Properties LLC).

Basis for the Opinion

This opinion is based on the information contained in the documents listed in Enclosure D. Those documents are kept in the Central Files Ecology's of the Northwest Regional Office of Ecology (NWRO) for review by appointment only. You can make an appointment by calling the NWRO resource contact at 425-649-7239.

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.

Ecology has determined your characterization of the Site is sufficient to establish cleanup standards for the Site and select a cleanup for the property. The Site is described above and in Enclosure B.

b. Establishment of cleanup standards for the Site.

i. Substance-specific standards.

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

The cleanup levels are as follows:

- Soil:** Tetrachloroethylene (PCE) in soil at 0.05 mg/kg for the protection of drinking water and indoor air and unrestricted land use.
- Groundwater:** Tetrachloroethylene (PCE) in Ground Water at 5 ug/l for the protection of drinking water.
- Indoor air:** Tetrachloroethylene (PCE) at 4.27 ug/m³ and Trichloroethene (TCE) at 0.93 ug/m³ for the protection of commercial workers

Standard compliance points are as follows:

- Soil:** For the Direct Contact: From the ground surface to 15 feet below surface throughout the property. Please refer to Enclosure B for property.
- Groundwater:** Performance standards for the groundwater were measured from the uppermost level of the saturated zone extending vertically to the lowest-most depth which could be potentially affected by the property. These monitoring points are shown in Monitoring wells MW-1 through MW-8 as shown in Enclosure B.
- Indoor Air:** A site-specific risk assessment used a time weighted average as shown in table 1 of the August 31, 2010, Indoor Air Assessment. Performance monitoring was conducted at the floor drains and at the breathing spaces (about 4 feet above the ground) at the restrooms and center of the Staples Store as part of the evaluation of the cleanup standards for the indoor air. Locations of the points of compliance for the indoor air are located in Enclosure E. Please refer to Enclosure E for Table 1. The compliance points measured as part of the NFA performance monitoring and to be measured during the confirmation monitoring (Post NFA) as part of the five-year review are located in the center of the Staples Store and in the restroom of the Staples Store please refer to Enclosure E for post NFA Confirmation monitoring points and compliance points.

c. Selection of cleanup for the Property.

Ecology has determined the cleanup you selected for the property for the first release as described in the above (under the description of the property) meets the substantive requirements of MTCA. The cleanup meets the minimum cleanup requirements and does not exacerbate conditions or preclude reasonable cleanup alternatives elsewhere at the Site.

The cleanup consisted of over excavation of soil, vapor extraction, and natural attenuation of groundwater. These actions have removed contaminants below cleanup levels and meets the minimum requirements in WAC 173-340-360(2) and do not either exacerbate conditions at the Site or preclude reasonable alternatives.

d. Cleanup of the Property.

Ecology has determined the cleanup you performed for the first release as described in the above (under the description of the property) meets the applicable Site cleanup standards within the property. This determination is dependent on the continued performance and effectiveness of the post-cleanup controls and monitoring specified below.

The cleanup consisted of over excavation of soil, vapor extraction and natural attenuation of groundwater. These actions have removed contaminants below cleanup levels and meets the minimum requirements in WAC 173-340-360(2) and do not either exacerbate conditions at the Site or preclude reasonable alternatives. This cleanup does not affect the cleanup necessary to address the second release of PCE from an up-gradient source that has migrated onto the property because the two plumes are not comingled. Please refer to Enclosures C-1 and C-2 respectively for the location of up-gradient source and subsequent migration onto the property.

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 constitutes only an "interim action" for Site No. 1 as a whole. There is also a second plume of PCE coming from Redmond Shopping Square property. Please refer to Enclosures B, C-1 and C-2 respectively for the two sites and the plume coming from off property sources identified as the Redmond Shopping Square property

Post-Cleanup Controls and Monitoring

3. Performance of conformational monitoring.

Conformational indoor air monitoring (Post NFA) is necessary at the property to confirm the long-term effectiveness of the cleanup. Conformational monitoring is to occur in the third year after the issuance of this NFA letter with the results sent to Ecology. Confirmation monitoring points and parameters to be measured are identified in Enclosure E and Table 1. The confirmation monitoring (Post NFA) is the basis for Ecology's five-year review period. Ecology has approved the monitoring plan you submitted. A copy of the plan is included in Enclosure F.

Periodic Review of Post-Cleanup Conditions

As noted above, Ecology will conduct periodic reviews of post-cleanup conditions at the property to ensure that they remain protective of human health and the environment. At the minimum, Ecology shall conduct a periodic review on the fifth year following the date of this NFA - April 1, 2016. If Ecology determines based on a periodic review that further remedial action is necessary at the property, Ecology will then withdraw this opinion.

Listing of the Site

Based on this opinion, we 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 Site, we will not remove the Site from our lists of hazardous waste sites. The property will remain listed as part of the Site because the cleanup of the property does not change the boundaries of the Site. Even if you address the site as it relates to the first release due to property-related operational activities, further action will still be needed at the property to address the second release coming from an off-property and up-gradient location before the property can be de-listed from our database of hazardous waste sites

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**:

- 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 performed is substantially equivalent. Courts make that determination. See RCW 70.105D.080 and WAC 173-340-545.

Mr. Thomas Markl
April 1, 2011
Page 7

3. State is immune from liability.

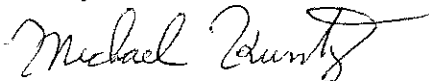
The state, Ecology, and its officers and employees are immune from all liability, and no cause of action of any nature may arise from any act or omission in providing this opinion. See RCW 70.105D.030(1)(i).

Contact Information

Thank you for cleaning up your property under the Voluntary Cleanup Program (VCP). We look forward to working with you to clean up the remainder of the Site.

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, please contact me by phone at 360-407-7239 or by e-mail at mknu461@ecy.wa.gov.

Sincerely,



Michael Kuntz, P.G., P.HG.
HQ Toxics Cleanup Program

Enclosures: A - Legal Description of the Property
 B - Description and Diagrams of the Site (including the Property)
 C - 1 Two Properties
 C - 2 Two Sites
 D - Basis for the Opinion: List of Documents
 E - Indoor Air Compliance
 F - Conformational Monitoring Plan

cc: Cliff Schmitt, Farallon Consulting
 Dolores Mitchell (without enclosures)

Enclosure A

Legal Description of the Property

LEGAL DESCRIPTION OF LOT 1 OF REDMOND CENTER

LOT 1:

All of Lot 8 and the south 70 feet of Lot 10 of the Plat of Redmond Center as recorded in volume 95 of Plats, Pages 94 through 97, in King County, Washington, and that portion of Lot 9 of said Plat of Redmond Center described as follows:

Beginning at the southwest corner of said Lot 9; thence north $0^{\circ}49'10''$ east 70.00 feet along the west line of said Lot 9; thence south $89^{\circ}10'50''$ east 120.24 feet to the point of curvature of a 300 foot radius curve to the right; thence easterly along said curve an arc distance of 92.83 feet to the point of tangency; thence south $71^{\circ}27'06''$ east 84.57 feet; thence south $89^{\circ}10'50''$ east 20 feet to the east line of said Lot 9; thence south $0^{\circ}33'56''$ west 30 feet along said east line to the southeast corner of said Lot 9; thence north $89^{\circ}10'50''$ west 312.28 feet along the south line of said Lot 9 to the point of beginning.

Subject to and together with easements of record.

Filed for record this 3rd day of April, 1991 at 1:42 p.m. in Book 79 of Surveys at page 161 at the request of BUSH, ROED & HITCHINGS, INC. 9104039002

COUNTY AUDITOR OR DIVISION OF RECORDS AND ELECTIONS
Jane Hague-County Auditor or Carolyn Ableman-Superintendent of Records

*Source: Lot Line Revision LLR 90-01, Redmond Center. Prepared by Bush, Roed & Hitchings, Inc., Civil Engineers and Land Surveyors, 2009 Minor Avenue East, Seattle, Washington 98102.

Enclosure B

Description and Diagrams of the Property and Site

PROPERTY DESCRIPTION

The property is located at 15796 Redmond Way in Redmond, Washington in a single-story, commercial strip mall of masonry construction (Figure 2). According to King County Tax Assessor records, the strip mall building was constructed in various stages from 1966 through the early 1980s (King County, Washington 2005). Several remodels have occurred since the early 1980s, with the most recent being a significant expansion near the western end of the strip mall building in 2002. Asphalt-paved parking areas with landscaping strips are located north and south of the building. The strip mall is bordered on the west by 158th Avenue South and on the east by 160th Avenue Northeast. A new building was constructed on the southeastern portion of the property in 2009. The building houses commercial businesses. A sub slab depressurizing system has been installed and has operated continuously since July 24, 2009. Please refer to the enclosures for location of the property and buildings.

The Cleaning Center of Redmond has operated as a dry cleaning facility or dry cleaning drop-off facility from approximately 1990 to the present. In a January 2005 personal communication with Farallon, Ms. Carol Sama, a business consultant with a long-term relationship with Nelgroup Properties LC, stated that a steel pan for the containment of potential spills of PCE as placed beneath the dry cleaning machine at the Cleaning Center of Redmond in 1999 (Farallon 2005). Use of PCE was discontinued when the dry cleaning machine was removed in October 2002, at which time the facility became a drop-off only location for dry cleaning. Regular laundry services are still performed at the Cleaning Center of Redmond.

SITE DESCRIPTION

The site begins at the Former Cleaning Center of Redmond and continues west to the Sammamish River. According to the U.S. Geological Survey (1982) topographic map *Bellevue North, Washington* dated 1982, the Site is at an elevation of approximately 40 feet above mean sea level and is relatively flat. Regional topography in the vicinity slopes to the west. Please refer to enclosures for location of Site.

SECOND PLUME OF TETRACHLORETHYLENE PCE ON THE PROPERTY

A second plume of Tetrachloroethylene exists on the Cleaning Center of Redmond Property. The origin of the plume is very likely the former dry cleaning operation on the Redmond Square Property located to the east and up-gradient of the property. The extent of the plume on the Cleaning Center of Redmond Property is unknown. Please refer to enclosures for plume location and source.

Enclosure C-1

Two Properties

Enclosure C-2

Two Sites

Enclosure D

Basis for the Opinion - List of Documents

- 1) VCP Application of September, 2004
- 2) Work Plan for Indoor Air Quality Assessment, March 25, 2011
- 3) Requested Information, Farallon Consulting March 1, 2011
- 4) Response to January 11, 2011, e-mail, Farallon Consulting, January 18, 2011
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- 27) Letter Report on Environmental Soil and Groundwater Soil Sampling – the Cleaning Center of Redmond, March 18, 1999

Enclosure E
Indoor Air Compliance

Enclosure F

**Confirmational Indoor Air Monitoring Plan
(To be performed three years after issuance of
the NFA letter with results forwarded to Ecology)**

Enclosure A

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SAMMAMISH RIVER

BUILDING

LEGEND PROPERTY

- BOUNDARY
 - MW-9 ◆ ONSITE MONITORING WELL
 - MW-6 ◆ DECOMMISSIONED WELL
 - EMW-2 ◆ OFFSITE MONITORING WELL
 - SVE ⊕ SVE WELL
 - FB-1 ● BORING LOCATION
 - +++++ TRAIN TRACKS
 - (22.72) GROUNDWATER ELEVATION RELATIVE TO MEAN SEA LEVEL
 - 23.00 - - - GROUNDWATER ELEVATION CONTOUR
 - ← APPROXIMATE DIRECTION OF GROUNDWATER FLOW
- ALL RESULTS IN MICROGRAMS PER LITER (ug/L)
- [3.3] TETRACHLOROETHENE (PCE) IN GROUNDWATER
- BOLD** INDICATE CONCENTRATIONS ABOVE WASHINGTON STATE MODEL TOXICS CONTROL ACT CLEANUP LEVELS
- NOTE: 1. ALL LOCATIONS ARE APPROXIMATE
 2. MONITORING WELL MW-10 NOT USED IN CALCULATION OF GROUNDWATER ELEVATION CONTOURS
 3. MONITORING WELL MW-10 WAS SAMPLED ON JUNE 22, 2007
 4. RESULTS FOR BORING FB-1 ARE RECONNAISSANCE GROUNDWATER SAMPLES COLLECTED IN AUGUST 2006

PARKING LOT

OPPORTUNITY BUILDING

PARKING LOT

APARTMENT BUILDINGS

APARTMENT BUILDINGS

APARTMENT BUILDINGS

APARTMENT BUILDINGS

83RD STREET NE

DRAINAGE SWALE

160TH AVENUE NE

158TH AVENUE NE

0 120
APPROXIMATE SCALE IN FEET

BUILDING

BUILDING

EMW-2 (25.33) ◆

BUILDING

BUILDING

BUILDING

EMW-1 (25.47) ◆

BUILDING

ECHO CLEANERS

BUILDING

JAMBA JUICE

CHEVRON STATION

BUILDING

FIGURE 3

GROUNDWATER ELEVATION CONTOURS AND PCE CONCENTRATIONS IN GROUNDWATER FOR MAY 15, 2007
CLEANING CENTER OF REDMOND
REDMOND, WASHINGTON
FARALLON PN: 650-001

FARALLON CONSULTING
975 5th Avenue Northwest
Issaquah, WA 98027

Drawn By: DEW Checked By: JC Date: 9/17/07 Disk Reference: 650001a

DEPTH	PCE
12.5'	2.4
31.5'	0.95
68.5'	<0.20

FB-1

MW-8 (22.72) ◆

PARKING LOT

MW-2 (23.64) ◆

PARKING LOT

MW-1 (24.12) ◆

MW-5 (24.46) ◆

MW-6 (11.3) ◆

LOADING DOCK

MW-4 (3.3) ◆

MW-8 (11.3) ◆

MW-10 (7.4) ◆

SVE ⊕

QFC

BUILDING

Approximate Location of Site

BEN FRANKLIN CRAFTS

BUILDING

RETAIL STORES

STAIRS

CLEANING CENTER OF REDMOND

PARKING LOT

PARKING LOT

STARBUCKS

MW-10 (7.4) ◆

PIZZA HUT

BUILDING

REDMOND WAY

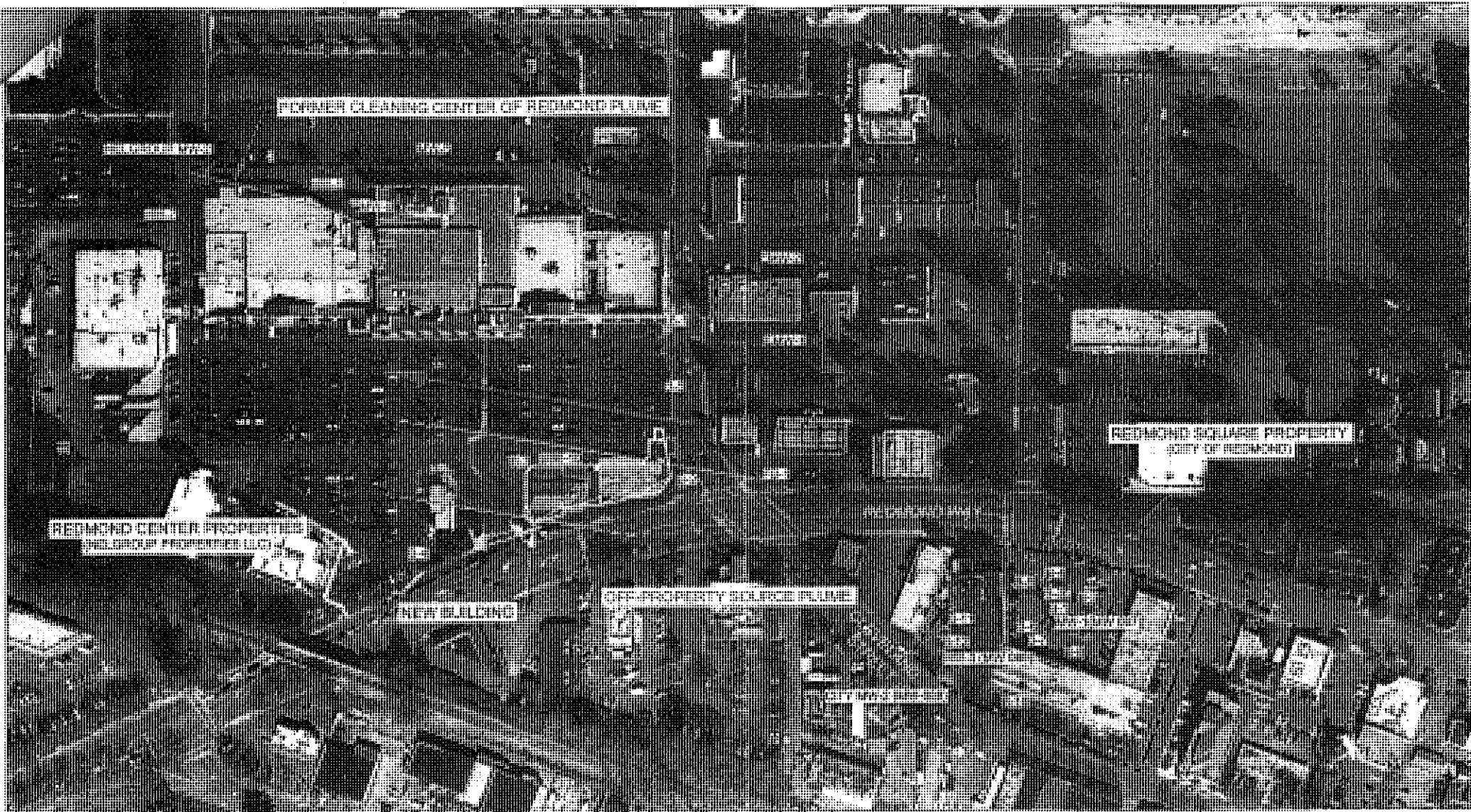
BUILDING

PARKING LOT

BUILDING

Enclosure C-1

Two Properties



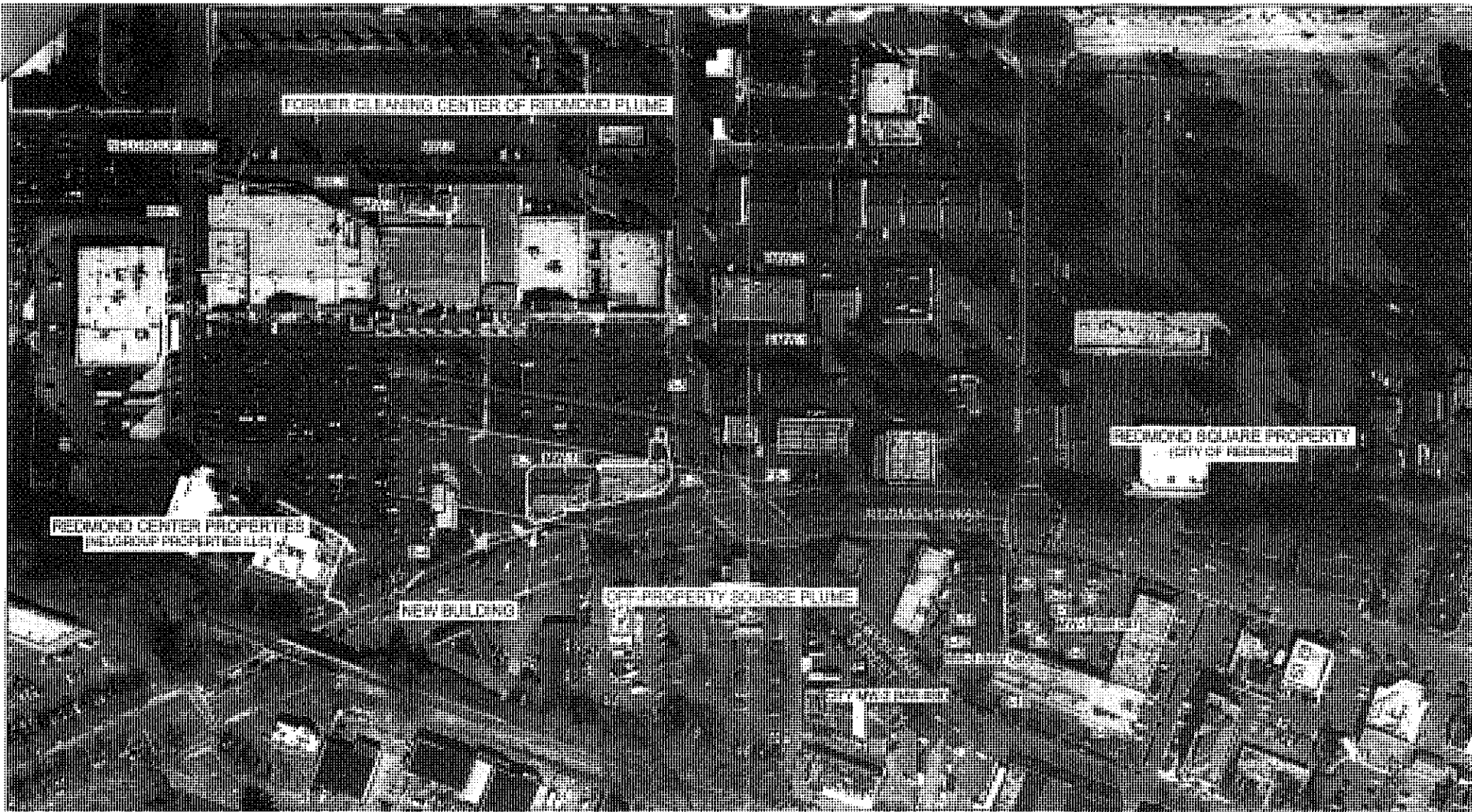
<p>LEGEND</p> <p>INDICATES CENTER LINE OF HIGHWAY OR AIRWAY</p> <p>INDICATES BOUNDARY OF REDMOND PLANE</p> <p>INDICATES PROPERTY BOUNDARY</p> <p>INDICATES PROPERTY BOUNDARY PLUME</p> <p>INDICATES PROPERTY BOUNDARY PLUME</p> <p>INDICATES PROPERTY BOUNDARY PLUME</p> <p>INDICATES PROPERTY BOUNDARY PLUME</p>	<p>INDICATES CENTER LINE OF HIGHWAY OR AIRWAY</p> <p>INDICATES BOUNDARY OF REDMOND PLANE</p> <p>INDICATES PROPERTY BOUNDARY</p> <p>INDICATES PROPERTY BOUNDARY PLUME</p> <p>INDICATES PROPERTY BOUNDARY PLUME</p> <p>INDICATES PROPERTY BOUNDARY PLUME</p> <p>INDICATES PROPERTY BOUNDARY PLUME</p>	<p>APPROXIMATE SCALE IN FEET</p>	<p>FIGURE 1</p> <p>SITE PLAN</p> <p>CLEANING CENTER OF REDMOND</p> <p>REDMOND, WASHINGTON</p>	<p>FIGURE 1</p> <p>SITE PLAN</p> <p>CLEANING CENTER OF REDMOND</p> <p>REDMOND, WASHINGTON</p> <p>DATE: 08/01/01</p> <p>BY: [Signature]</p>
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ENCLOSURE C-1

Two Properties

Enclosure C-2

Two Sites



LEGEND

REDMOND CENTER AND OFFICE BUILDINGS

- ⊕ BUILDING WITH GREENHOUSE EFFECT
- ⊖ BUILDING WITH GREENHOUSE EFFECT
- ⊙ BUILDING WITH GREENHOUSE EFFECT
- ⊛ BUILDING WITH GREENHOUSE EFFECT

REDMOND PLUME, CITY OF REDMOND, WASHINGTON

- ⊕ BUILDING WITH GREENHOUSE EFFECT
- ⊖ BUILDING WITH GREENHOUSE EFFECT
- ⊙ BUILDING WITH GREENHOUSE EFFECT
- ⊛ BUILDING WITH GREENHOUSE EFFECT

APPROXIMATE DIRECTION OF DISPERSED PLUME



REDMOND PLUME

REDMOND PLUME (CITY OF REDMOND, WASHINGTON)

FIGURE 1

SITE PLAN

CLEANING CENTER OF SPACING

REDMOND, WASHINGTON

REDACTED BY 100-1000

Source: [redacted] (Source: [redacted]) [redacted] (Source: [redacted]) [redacted] (Source: [redacted])

Enclosure C-2

Two Sites

Enclosure D

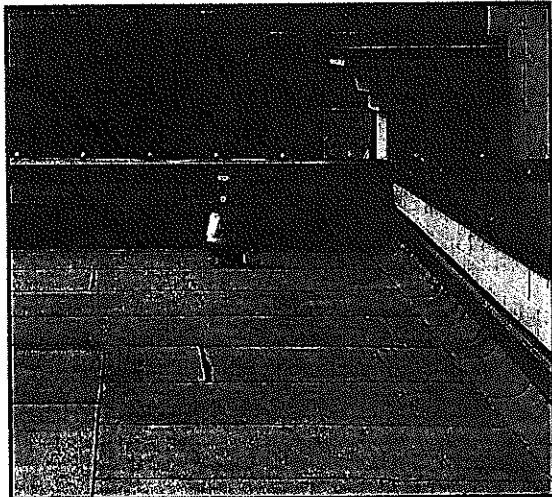
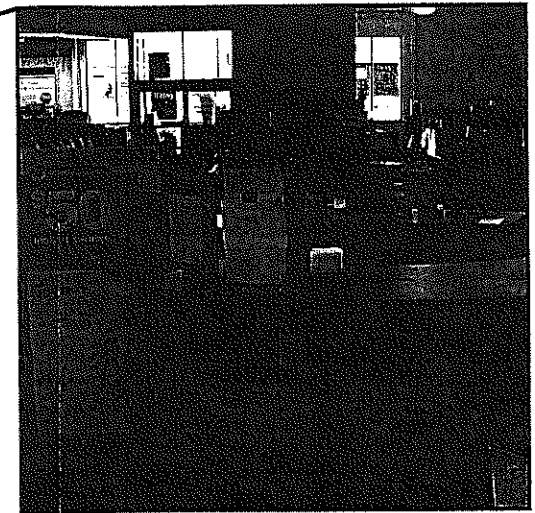
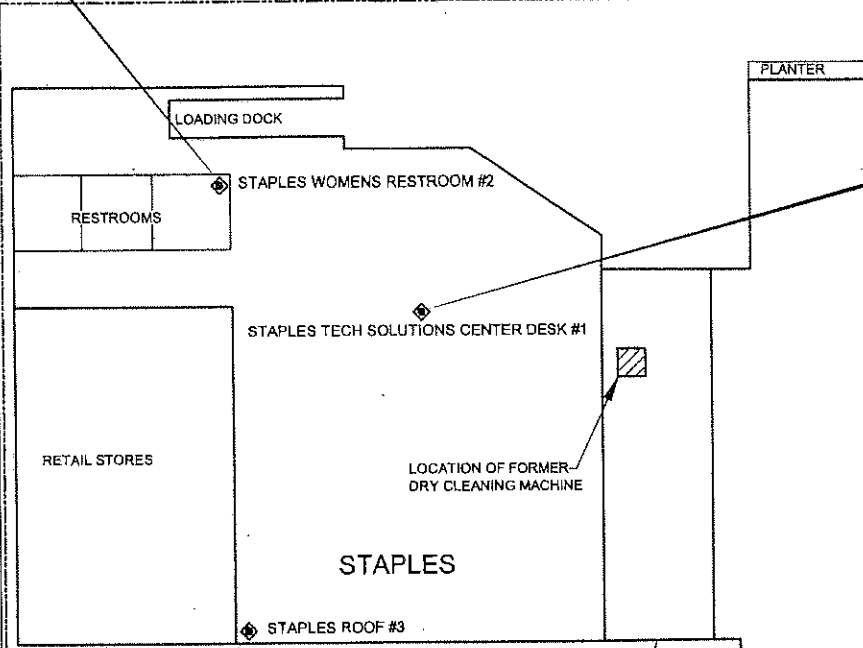
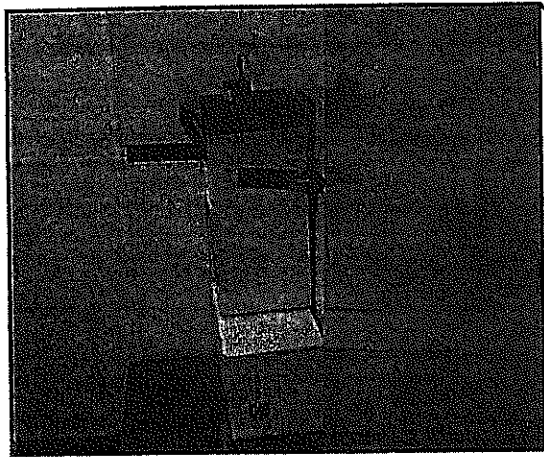
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Enclosure E

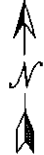
Indoor Air Compliance




LEGEND

--- SITE BOUNDARY

◆ INDOOR AIR AND AMBIENT SAMPLE LOCATIONS



 FARALLON CONSULTING 975 5th Avenue Northwest Issaquah, WA 98027	FIGURE 1 JUNE 2010 AIR SAMPLING LOCATIONS CLEANING CENTER OF REDMOND REDMOND, WASHINGTON		
	FARALLON PN: 650-001		
Drawn By: DEW	Checked By: JC	Date: 8/4/10	Disk Reference: 650001a

ENCLOSURE E INDOOR AIR COMPLIANCE

Table 1
 Summary of Indoor Air Quality Assessment Results
 Cleaning Center of Redmond
 Redmond, Washington
 Farallon PN: 650-001

Sample Location and Identification	Date Collected	Analytical Results (micrograms per cubic meter)	
		Tetrachloroethene	Trichloroethene
June 2007 Sampling Event			
Staples Building Women's Restroom (adjacent to floor drain)/1A-1	6/12/2007	1.4	<0.19
Staples Building Women's Restroom (breathing zone)/1A-2	6/12/2007	1.4	<0.19
June 2010 Sampling Event			
Staples Tech Solutions Center Desk #1	6/29/2010	<0.22	<0.18
Staples Womens Restroom #2	6/29/2010	<0.21	<0.17
Staples Roof #3	6/29/2010	<0.21	<0.17
Modified MTCA Method B Formula Values for Indoor Air for Commercial Exposure Scenario¹		4.27	0.93

NOTES:

< Indicates compound not detected at or above the stated laboratory reporting limit.

¹Washington State Department of Ecology Model Toxics Control Act Cleanup Regulation (MTCA) Method B Formula Values for Air, modified as follows in accordance with Equation 750-2 of Section 750(3)(b)(ii)(B) of Chapter 173-340 of the Washington Administrative Code:

Exposure Duration=250 days/year (5 days/week and 50 week/year work schedule) and a 25-year exposure period.

Indoor air value is a time-weighted average assuming that an employee spends 0.25 hours/day (3 percent) in restroom and 7.75 hours/day (97 percent) in store area.

ENCLOSURE E-1

Enclosure F

**Conformational Indoor Air Monitoring Plan
(To be performed three years after issuance of
the NFA letter with results forwarded to Ecology)**



975 5th Avenue Northwest, Issaquah, Washington 98027
Tel: (425) 295-0800 Fax: (425) 295-0850
www.farallonconsulting.com

March 25, 2011

Mr. Michael Kuntz
Washington State Department of Ecology
PO Box 47600
Olympia, Washington 98504

**RE: WORK PLAN FOR INDOOR AIR QUALITY ASSESSMENT
CLEANING CENTER OF REDMOND SITE
REDMOND, WASHINGTON
FARALLON PN: 650-001**

Dear Mr. Kuntz:

Farallon Consulting, L.L.C. (Farallon) has prepared this Work Plan for Indoor Air Quality Assessment on behalf of Nelson Real Estate Management LLC to describe procedures to assess indoor air quality for the presence of the dry cleaning solvent tetrachloroethene (PCE) and its degradation product trichloroethene (TCE) at the Staples tenant space located at the Redmond Center property, down-gradient from the Cleaning Center of Redmond at 15796 Redmond Way in Redmond, Washington. The Cleaning Center of Redmond Site is enrolled in the Washington State Department of Ecology (Ecology) Voluntary Cleanup Program (VCP) and has been assigned VCP Identification No. NW1324. Prior cleanup actions at the Cleaning Center of Redmond were conducted in accordance with the Washington State Model Toxics Control Act Cleanup Regulation (MTCA) as established in Chapter 173-340 of the Washington Administrative Code (WAC 173-340).

Ecology is preparing an Opinion Letter on the sufficiency of the cleanup action conducted to address the release of PCE at the Cleaning Center of Redmond. Farallon understands that the Opinion Letter will state that no further cleanup actions are required, contingent on conducting an indoor air monitoring event approximately 3 years after the Opinion Letter is issued to confirm that concentrations of PCE and TCE (if detected) in indoor air are protective of human health for commercial workers and the public. The purpose of this Work Plan for Indoor Air Quality Assessment is to describe the procedures for performing the required indoor air quality assessment.

Prior assessments of indoor air quality at the Staples tenant space were conducted by Farallon in June 2007 and June 2010 at the request of Ecology. These assessments were documented in the letter regarding Indoor Air Quality Assessment Results, Cleaning Center of Redmond Site, Redmond, Washington, Voluntary Cleanup Program Identification No. NW1324 dated August 31, 2010, prepared by Farallon. The Staples tenant space was selected for the assessments because it is the closest tenant space down-gradient from the Cleaning Center of Redmond with a perforation in the floor (floor drain) that potentially could allow concentrations of PCE and its degradation products to enter the building.

- The Summa canisters will be packed in their original shipping containers, sealed with a custody seal, and sent within 3 days to Air Toxics Laboratory in Folsom, California for analysis.

Laboratory Analysis and Evaluation of Results

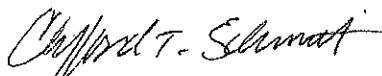
Air samples will be analyzed for PCE and TCE using modified U.S. Environmental Protection Agency Method TO-15 SIM. The reporting limits for PCE and TCE by this analytical method are approximately 0.2 micrograms per cubic meter, which is less than the commercial worker exposure scenario cleanup levels calculated using Equation 750-2 of WAC 173-340-750 and in accordance with the provisions of WAC 173-340-750(3)(c). The bases for calculating the commercial worker exposure scenario cleanup levels are presented in the Indoor Air Quality Assessment Results report and were agreed to by Ecology. The monitoring results will be evaluated and presented in a letter report.

CLOSING

If the Draft Vapor Intrusion Guidance is modified prior to the confirmation monitoring event required by Ecology in the Opinion Letter, this Work Plan for Indoor Air Quality Assessment will be revised as necessary to conform to the procedures specified in the modified Vapor Intrusion Guidance. Please contact the undersigned at (425) 295-0800 if you have questions or comments regarding this Work Plan.

Sincerely,

Farallon Consulting, L.L.C.



Clifford T. Schmitt, L.G., L.H.G.
Principal

Attachments: Attachment A, Standard Operating Procedure for Indoor Air Sampling
Attachment B, Standard Operating Procedure for Ambient Air Sampling

cc: Thomas L. MarkI, CEO, Nelson Real Estate Management LLC

CTS:bjj

ATTACHMENT A
STANDARD OPERATING PROCEDURE FOR INDOOR AIR SAMPLING
U.S. ENVIRONMENTAL PROTECTION AGENCY ANALYTICAL METHOD TO-15

This standard operating procedure (SOP) contains the following sections:

1. Purpose
2. Application
3. References
4. Equipment and Supplies
5. Procedures
 - 5.1. Preparation of Buildings for Sampling
 - 5.2. Sampling Methodology
 - 5.3. Post-Sample-Collection Procedures
 - 5.4. Analysis
6. Decontamination
7. Documentation

1.0 Purpose

The purpose of this SOP is to provide personnel with the specific information needed to collect and document consistent and representative indoor air data.

2.0 Application

This SOP is to be followed by all personnel who collect indoor air samples associated with the Cleaning Center of Redmond Site in Redmond, Washington.

3.0 References

- Air Toxics LTD. Guide to Air Sampling and Analysis, Canisters and Tedlar Bags. Fourth Edition. Folsom, California. <www.airtoxics.com>.
- Massachusetts Department of Environmental Protection. 2002. *Indoor Air Sampling and Evaluation Guide*. Boston, Massachusetts. April.

5.2 Sampling Methodology

Time-integrated indoor air samples are collected using 6-liter Summa canisters prepared under negative pressure and laboratory-certified clean for the constituents of concern for the Cleaning Center of Redmond Site. The Summa canisters should be equipped with dedicated flow regulators set at the appropriate flow rate to allow sampling over the time period desired.

- Verify that the canister number engraved on the canister matches the canister number listed on the certified-clean tag attached to the canister to ensure that proper decontamination of the canister was completed.
- Set up the canister in the desired sample location.
- Verify that the canister valve is closed tightly and then remove the threaded cap at the top of the canister.
- Attach the flow regulator/pressure gauge to the top of the canister using a wrench to gently tighten it.
- Open the valve and record the pressure on the gauge as the “initial pressure” in the field notes and on the sample tag attached to the canister.
- Completely fill out the sample tag attached to the canister and record the following sample information in the field book:
 - Site name;
 - Sample identification;
 - Sample start date;
 - Sample start time;
 - Location of sample (show on building floor plan or sketch map);
 - Initial pressure of canister; and
 - Canister number.
- After sampling begins and the canister is verified to be operating correctly, leave the canister to fill.
- Return to check the canisters to ensure that they are operating properly. Depending on the length of the sampling period selected, it will be necessary to return 30 minutes to 1 hour prior to the end of the sampling period. It is necessary to check the canister prior to the complete sampling period because the accuracy of the flow regulators can vary slightly, causing the canisters to fill faster than expected. To check the sample collection progress, complete the following:
 - Record the gauge pressure in the field book. The final pressure at the end of sampling should be approximately -5 to -6 inches of mercury. If the canister has already reached this point, sampling is complete and this pressure should be recorded as the “final pressure” on the sample tag and in the field book. If the pressure is not yet at this level, the canister should be left to continue filling.

**ATTACHMENT B
STANDARD OPERATING PROCEDURE FOR
AMBIENT AIR SAMPLING**

WORK PLAN FOR INDOOR AIR QUALITY ASSESSMENT
Cleaning Center of Redmond
Redmond, Washington

Farallon PN: 650-001

- U.S. Environmental Protection Agency. 1999. *Method TO-15*. EPA/625/R-96/010b. Cincinnati, Ohio. January.
- Washington State Department of Ecology (Ecology). 2009. *Draft Guidance for Evaluating Soil Vapor Intrusion in Washington State: Investigation and Remedial Action*. October.

4.0 Equipment and Supplies

The following equipment and supplies are necessary to properly conduct indoor air sampling:

- A sufficient number of 6-liter Summa canisters, appropriate filters, and flow controllers to collect samples required by the Work Plan;
- Equipment required to collect samples using 6-liter Summa canisters, including appropriate wrenches and pressure gauges; and
- Shipping package for the Summa canisters.

5.0 Procedures

5.1 Sampling Locations

Ambient air samples usually are collected near buildings where indoor sampling is occurring. Sample collection points should be selected so that intake occurs at least 6 feet above ground surface and upwind of the building undergoing indoor air sampling.

5.2 Sampling Methodology

Time-integrated ambient air samples are collected using 6-liter Summa canisters prepared under negative pressure and certified clean for the constituent of concern for the Cleaning Center of Redmond Site. The Summa canisters should be equipped with dedicated flow regulators set at the appropriate flow rate to allow sampling over the time period desired.

- Verify that the canister number engraved on the canister matches the canister number listed on the certified-clean tag attached to the canister to ensure that proper decontamination of the canister was completed.
- Set up the canister in the desired sample location.
- Verify that the canister valve is closed tightly and then remove the threaded cap at the top of the canister.
- Attach the flow regulator/pressure gauge to the top of the canister using a wrench to gently tighten it.
- Open the valve and record the pressure on the gauge as the “initial pressure” in the field notes and on the sample tag attached to the canister.
- Completely fill out the sample tag attached to the canister and record the following sample information in the field book:
 - Site name;

Ensure that documentation of this certification is included on a tag attached to the canister and in the paperwork that accompanies the canister shipment from the laboratory.

7.0 Documentation

Record all field activities, environmental and building conditions, and sample documentation in the field notebook.



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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June 20, 2012

Ms. Elaine Dilley
City of Redmond
PO Box 97010
Redmond, WA 98073

Re: No Further Action at the Following Site:

- **Site Name:** Redmond Shopping Square
- **Site Address:** 16119 NE Redmond Way, Redmond, WA
- **Facility/Site No.:** 18067
- **VCP Project No.:** NW 2415
- **Cleanup Site ID No.:** 11597

Dear Ms. Dilley:

The Washington State Department of Ecology (Ecology) received your request for an opinion on your independent cleanup of the Former Redmond Shopping Square 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:

- Heavy oil-range petroleum hydrocarbons in Soil.
- Tetrachloroethene (PCE) and related degradation products in Soil and Ground Water.

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.

PCE has been consistently detected at low concentrations in shallow groundwater beneath the Property. The PCE concentrations on the Property are similar to those detected throughout downtown Redmond in other studies. This indicates that possible off-property sources may contribute to PCE contamination beneath the Property. However, slightly higher PCE concentrations in the vicinity of the former dry cleaner located on the southwestern portion of the Property indicate an on-property source. At this time, Ecology has no information regarding any off-property PCE sources.

Basis for the Opinion

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

1. GeoEngineers, 2012. *Request for No Further Action Determination, Former Redmond Shopping Square, 161st Avenue NE between Cleveland Street and Redmond Way, Redmond, Washington.* March 20.
2. GeoEngineers, 2011. *Final Soil Cleanup Report, City of Redmond 161st Avenue NE Extension, Former Redmond Shopping Square, 161st Avenue NE between Cleveland Street and Redmond Way, Redmond, Washington.* February 16.
3. GeoEngineers, 2009. *Supplemental Site Assessment, Redmond Shopping Square, Future 161st Avenue NE Extension between Cleveland Street and Redmond Way, 16101-16149 NE Redmond Way, Redmond, Washington.* August 17.
4. GeoEngineers, 2007. *Phase I and II Environmental Site Assessment, Redmond Shopping Square, Future 16119 NE Redmond Way, Redmond, Washington.* October 26.

Ms. Elaine Dilley
June 20, 2012
Page 3

Those documents are kept in the Central Files of the Northwest Regional Office of Ecology (NWRO) for review by appointment only. You can make an appointment by calling the NWRO resource contact at (425) 649-7235 or sending an email to nwro_public_request@ecy.wa.gov.

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**.

Ground water in four monitoring wells on the Property (MW088, MW089, MW343 and MW344) was sampled in 2007, 2008 and 2009 and in four consecutive quarters in 2011. Monitoring wells MW088 and MW089 are downgradient of the former dry cleaner location. The 2011 quarterly samples yielded PCE at concentrations below Method A cleanup levels. Related PCE degradation products including trichloroethylene (TCE), (cis)1,2-dichloroethene and vinyl chloride were not ever detected in any of the monitoring wells with the exception of TCE at a concentration below the Method A cleanup level in MW343 in February 2011.

2. Establishment of cleanup standards.

a. Cleanup levels.

Soil:

The Site is located in a commercial area. Soil cleanup levels suitable for unrestricted land uses are therefore applicable to this Site.

Soil cleanup levels protective of terrestrial species are also potentially applicable. However, they were deemed not-applicable for this Site based on the exclusion relating to proximity of undeveloped land in accordance with WAC 173-34-7491(1)(c)(i).

Because the cleanup at this Site was relatively straightforward and involved few hazardous substances, the MTCA Method A cleanup levels for unrestricted land uses

were deemed applicable and appropriate. Note that the Method A cleanup levels for soil were established based on protection of groundwater and direct contact.

Groundwater:

Cleanup levels were set for groundwater based on its use as a potential drinking water source. The MTCA Method A cleanup levels have been applied to the identified contaminants listed above.

b. Points of compliance.

Soil:

The point of compliance for soil is throughout the Site in order to protect against direct contact and ground water.

Groundwater:

The standard point of compliance for groundwater is throughout the Site from the uppermost level of the saturated zone extending vertically to the lowest most depth which 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 for the following contamination at the Site:

- Heavy oil-range petroleum hydrocarbon in soil.
- PCE in soil.

Although the detected PCE and petroleum hydrocarbon concentrations in soil on the Property were less than their corresponding cleanup levels, the City decided to remove accessible PCE and petroleum contaminated soil to the extent practical to improve groundwater quality beneath the Property, and reduce exposure to contaminated soil through direct contact during any future earth work. The cleanup action selected was excavation and off-site disposal of contaminated soil and in-situ treatment using hydrogen release compound (HRC).

4. Cleanup.

Ecology has determined the cleanup you performed meets the following cleanup standards:

- Heavy oil-range petroleum hydrocarbon in Soil.
- PCE in Soil and Ground Water.

Remedial actions completed at the Site have included the excavation of soil with detectable PCE concentrations in the former dry cleaner area. The dimensions of the excavation were 55 feet by 55 feet and 13 to 15 feet deep. Approximately 2,660 tons of PCE-contaminated soils were excavated and transported to the Waste Management Greater Wenatchee Landfill for disposal. However, the excavation of PCE contaminated soil was limited due to proximity to roadway and utilities.

According to the data collected for PCE-contaminated soils that remain in place at the Property, the concentration is likely to be below the cleanup level. Following completion of the excavation, approximately 50 gallons of HRC were applied to the bottom of excavation prior to backfilling to support biological degradation.

In addition, excavation was also conducted in some localized areas as described below:

- Approximately 95 tons of petroleum-contaminated soil was excavated in the vicinity of the former used oil ASTs area. The excavation was 25 feet by 20 feet and reached to maximum depth of approximately five feet bgs. The excavated soil was transported and disposed of at CEMEX in Everett.
- Approximately 48 tons of soil was excavated in the northern portion of the Property as shown on the attached Site diagram, where fill soil indicated possible contamination, from odor, staining or debris. The excavation was 25 feet by 10 feet and reached a maximum depth of approximately 10 feet bgs. The excavated soil was transported and disposed of at CEMEX in Everett.
- Approximately eight tons of petroleum-contaminated soil was excavated in the vicinity of MW087. The excavation was five feet by five feet and reached a maximum depth of approximately eight feet bgs. The excavated soil was transported and disposed of at CEMEX in Everett.
- Since peat was found to be unsuitable for use as road subgrade, peat beneath the planned roadway project was excavated and transported off-site for disposal.

Results from confirmation soil sampling showed that contaminants of concern were either not detected or detected but below their cleanup levels. Ecology has determined the cleanup you performed meets the cleanup standards established for the Site.

Ground water in four monitoring wells on the Property (MW088, MW089, MW343 and MW344) was sampled in 2007, 2008 and 2009 and in four consecutive quarters in 2011.

Monitoring wells MW088 and MW089 are located downgradient of the former dry cleaner location. The 2011 quarterly samples yielded PCE at concentrations below Method A cleanup levels. Related PCE degradation products including trichloroethylene (TCE), (cis)1,2-dichloroethene and vinyl chloride were not ever detected in any of the monitoring wells with the exception of TCE at a concentration below the Method A cleanup level in MW343 in February 2011.

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:

- Confirmed and Suspected Contaminated Sites 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.

Ms. Elaine Dilley
June 20, 2012
Page 7

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 the Site under the Voluntary Cleanup Program (VCP). This opinion terminates the VCP Agreement governing this project (#NW 2415).

For more information about the VCP and the cleanup process, please visit our website: 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 (425) 649-7064 or e-mail at hvic461@ecy.wa.gov.

Sincerely,



Heather Vick, LHg
Toxics Cleanup Program

Enclosures (1): A – Description and Diagrams of the Site

cc: Tony Orme, GeoEngineers
Sonia Fernandez, VCP administrator, Department of Ecology
Dolores Mitchell, Financial Manager, Department of Ecology

Enclosure A

Description and Diagrams of the Site

Site Description

Site: The Site comprises PCE releases to soil and groundwater, and petroleum hydrocarbon releases to soil at the former Redmond Shopping Square property located at 16119 NE Redmond Way in Redmond, Washington (the Property). The Property and the Site are shown on the attached Site Map.

Area Description: The Property is situated in the downtown area of the City of Redmond (City). The area is completely developed and dominated by commercial land use however some residential condominiums have also recently been constructed. Most surfaces are paved or covered by buildings.

Property History and Current Use: The Property is approximately 1.68 acres in size. It was originally developed in 1955 as a one-story retail strip mall building with a paved parking lot. The building was occupied by various businesses, including a dry cleaner, paint store, auto parts store and a restaurant.

The City purchased the Property in 2008, and the existing building was demolished in 2010. The City is currently redeveloping the Property for the 161st Avenue Northeast Extension project.

Sources of Contamination: Potential contamination sources consist of leaks and spills associated with the historical operations on the Property, including the former dry cleaner and auto parts store.

Physiographic Setting: The Site and surrounding area is located within the Sammamish River floodplain. The Site is at an elevation of approximately 40 feet above mean sea level.

Surface/Storm Water System: Surface water runoff in the area is collected in municipal storm drains and eventually discharges to the Sammamish River, which is located approximately 1,300 feet to the southwest.

Ecological Setting: There is little terrestrial habitat in the immediate vicinity of the Property. The area is heavily developed, with most surfaces paved or covered by buildings.

Geology: Soil encountered beneath the Property generally consists of sand with varying amounts of gravel which is Quaternary-aged alluvium to 25 feet below the ground surface (bgs), the maximum depth explored. Peat was present beneath the parking lot at depths of three to five feet below the ground surface and extending to approximately 11 feet bgs.

Groundwater: Ground water occurs as a shallow water table aquifer on the Site. The depth to groundwater is approximately nine to 17 feet bgs, and groundwater generally flows west-northwest. The Site is located in the City's Critical Aquifer Recharge Area in Wellhead Protection Zone 2. In Zone 2, ground water at the Site reaches the City's nearest drinking water well within a year or less.

Water Supply: The City provides drinking water for the area. The Property is located within the City's Wellhead Protection Zone.

Soil and Groundwater Contamination: Soil and groundwater were impacted at the Property as described below.

- Former dry cleaner area: This portion of the Site previously had elevated concentrations of PCE in soil in the southwest portion of the Property in the vicinity of the former dry cleaner. The PCE concentrations were all below the Method A soil cleanup level however the City opted to remove accessible PCE-impacted soil to the extent practical. A total of approximately 1,512 in-place cubic yards (2,660 tons) was removed and transported to Waste Management's Great Wenatchee Landfill in Wenatchee, Washington.

Groundwater was also impacted by PCE with intermittent exceedences, slightly above the cleanup level. PCE has been consistently detected in shallow groundwater beneath the Property at low concentrations similar to the concentrations detected throughout downtown Redmond during other studies which indicates possible off-Property sources may also contribute to PCE contamination beneath the Property. However, the PCE concentrations were slightly higher in the vicinity of the former dry cleaner which was located in the southwestern portion of the Property. However, at this time, there is no information regarding any off-Property PCE sources.

Ground water in four monitoring wells on the Property (MW088, MW089, MW343 and MW344) was sampled in 2007, 2008 and 2009 and in four consecutive quarters in 2011. Monitoring wells MW088 and MW089 are downgradient of the former dry cleaner location. The 2011 quarterly samples yielded PCE at concentrations below Method A cleanup levels. Related PCE degradation products including trichloroethylene (TCE), (cis)1,2-dichloroethene and vinyl chloride were not ever detected in any of the monitoring wells with the exception of TCE at a concentration below the Method A cleanup level in MW343 in February 2011.

- Former auto parts store: This portion of the Site previously had elevated concentrations of heavy oil-range petroleum hydrocarbons in shallow soil in the vicinity of the former waste oil ASTs. The concentrations were below the Method A cleanup level.

In addition, metals and PAHs were detected in subsurface soil within the upper 2.5 feet in the boring drilled for MW087 located in the former parking lot. However, concentrations of these contaminants were all below their corresponding clean up levels. Fill soil with physical indications of contamination, such as odor, staining and debris was encountered during construction activities in the northern portion of the Property.

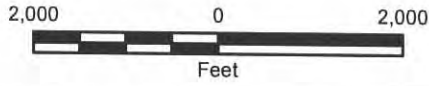
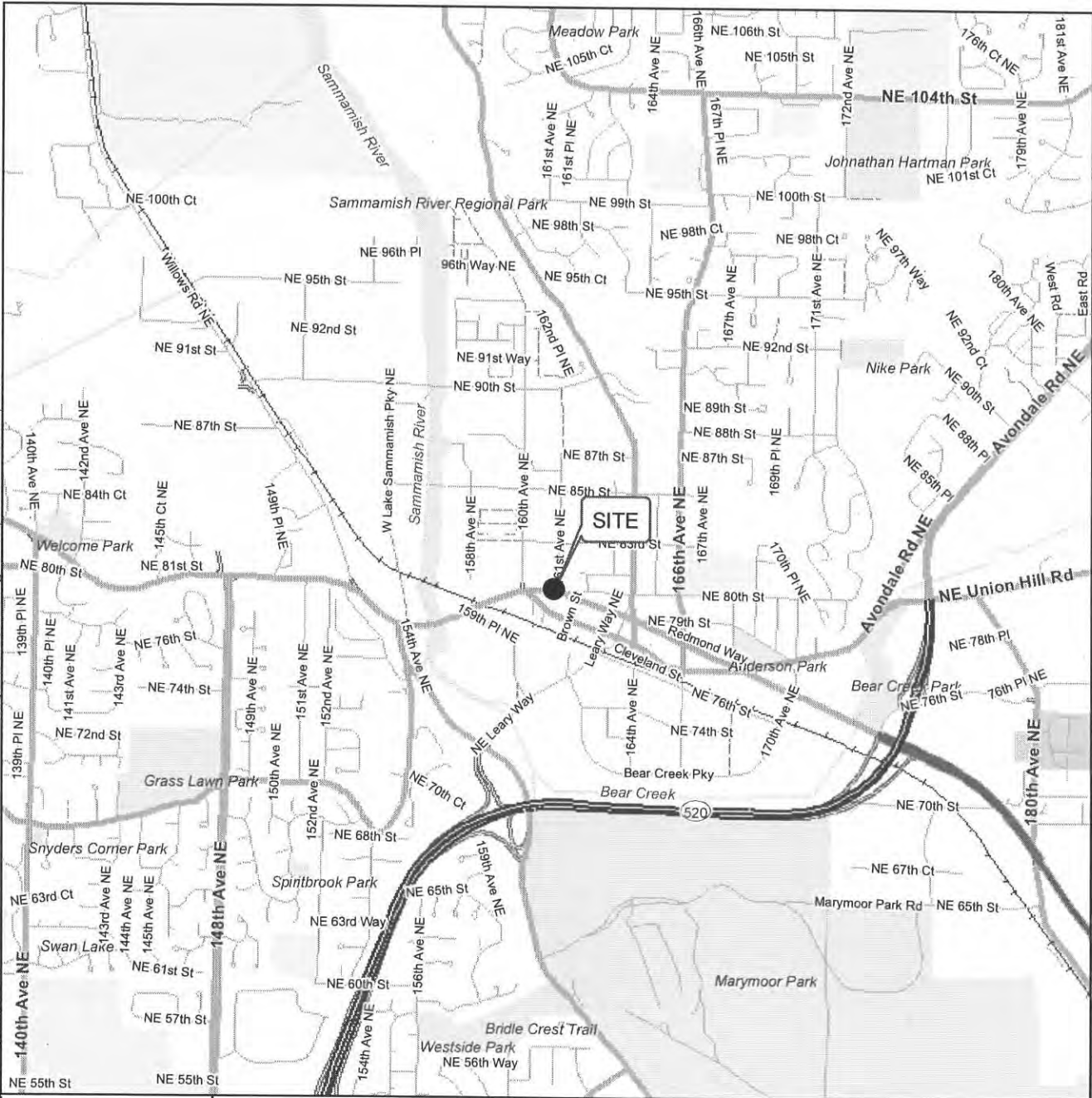
Ground water samples collected from Property monitoring wells MW087 (later decommissioned), MW088 and MW089 yielded non-detectable levels of petroleum hydrocarbons in 2007. Petroleum hydrocarbons were not included in subsequent site characterization activities.

Site Diagrams

Map Revised: August 12, 2009 MM2, EL


Path: P:\0\0500158\GIS\050016401 F1 VicinityMap.mxd

Office: RED

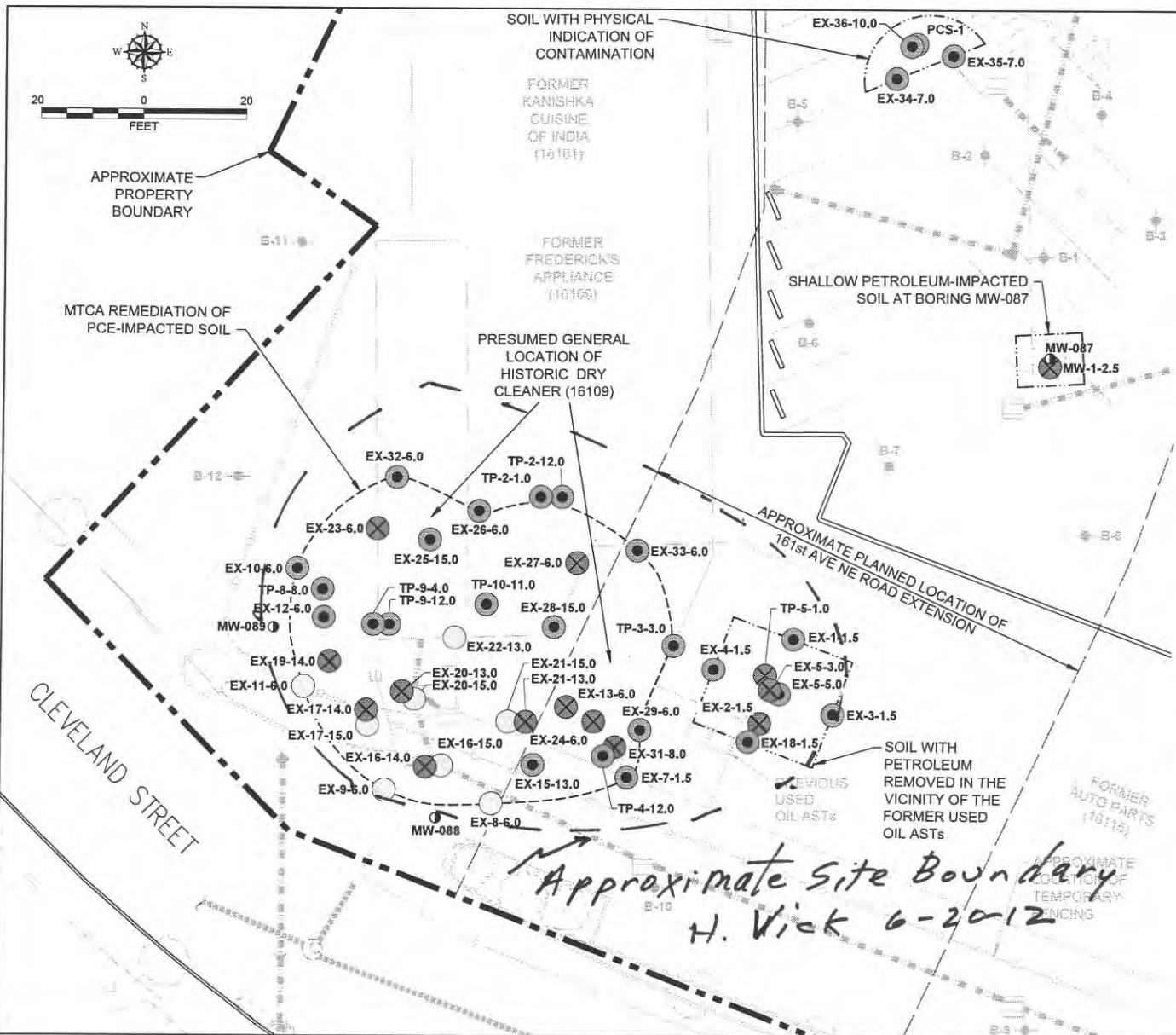


- Notes:
1. The locations of all features shown are approximate.
 2. This drawing is for information purposes. It is intended to assist in showing features discussed in an attached document. GeoEngineers, Inc. cannot guarantee the accuracy and content of electronic files. The master file is stored by GeoEngineers, Inc. and will serve as the official record of this communication.
 3. It is unlawful to copy or reproduce all or any part thereof, whether for personal use or resale, without permission.

Data Sources: ESRI Data & Maps, Street Maps 2005
 Transverse Mercator, Zone 10 N North, North American Datum 1983
 North arrow oriented to grid north

Vicinity Map	
161st Ave NE Extension Redmond, Washington	
GEOENGINEERS 	Figure 1A

W:\REDMOND\PROJECTS\10\050064\10\1\CAD\50064\01 Fig 3 Remedial Excavation.dwg\TAB\F3 MODIFIED BY THICHHAU ON FEB 16, 2011 - 13:19



Legend

- B-1 ● Boring Location
- MW-087 ● Monitoring Well
- Temporary Fencing
- Catch Basin
- Storm Drain Utility Lines
- Sanitary Sewer Utility Lines

Soil Sample Color	Soil Testing Results
○	PCE or petroleum hydrocarbons detected at concentrations less than the MTCA Method A cleanup levels.
⊗	PCE or petroleum hydrocarbons detected at concentrations less than the MTCA Method A cleanup levels. Soil represented by this sample was excavated and removed from the site for permitted disposal.
●	PCE or petroleum hydrocarbons were not detected.

EX-1-1.5 = Soil Sample 1 obtained at approximately 1.5 feet bgs.
PCE = Tetrachloroethene

Notes

- The locations of all features shown are approximate. Redmond Shopping Square building demolished as of July 2010.
 - This drawing is for information purposes. It is intended to assist in showing features discussed in an attached document. GeoEngineers, Inc. can not guarantee the accuracy and content of electronic files. The master file is stored by GeoEngineers, Inc. and will serve as the official record of this communication.
- Reference: Basemap drawings 0453bas01.dwg, 0453cont01.dwg, and 0453stm01.dwg.

Cleanup Confirmation Samples for Remedial Excavations Completed in September 2010

161st Avenue NE Extension - Former Redmond Shopping Square

16101 - 16149 NE Redmond Way
Redmond, Washington

GEOENGINEERS **Figure 3**



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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August 14, 2014

Mr. Thomas Markl
Nelson Real Estate Management LLC
16508 NE 79th Street
Redmond, WA 98052

RE: No Further Action at the Following Site:

Site Name: Nelgroup Properties, LLC
Site Address: 15946 & 15960 Northeast Redmond Way, Redmond, WA
Facility/Site No: 281
VCP Project No: NW2693

Dear Mr. Markl:

The Washington State Department of Ecology (Ecology) received your request for an opinion on your independent cleanup of the Nelgroup Properties LLC 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 that Site? **NO**

Ecology has determined that No Further Remedial Action (NFA) 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.

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

- Tetrachlorethylene into the Soil.
- Tetrachlorethylene Groundwater.
- Tetrachlorethylene into indoor air.

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

Please note the Redmond Shopping Square Property facility (VCP # NW2415) also affects parcel(s) of real property associated with this Site. This opinion does not apply to any contamination associated with the Redmond Shopping Square Property. Ecology issued a No Further Action (NFA) decision for the site associated with (VCP# NW2415) on June 20, 2012. Please refer to **Enclosure A** for Redmond Shopping Square Property facility. Also, the Site is located on the Redmond Center Property for which a property specific NFA for the Cleaning Center of Redmond (VCP # NW1324) was issued on April 1, 2011. This opinion does not apply to any contamination associated with (VCP# NW1324). Please refer to **Enclosure A** for Cleaning Center of Redmond property.

Basis of the Opinion

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

1. Groundwater Monitoring Results for opinion Nelgroup Properties LLC Site, Farallon Consultants, May 16, 2014.
2. Summary of Cleanup Actions Nelgroup Properties, Farallon Consultants, April 26, 2013.
3. Voluntary Cleanup Program Request for Assistance, Redmond Center Property, Farallon Consultants, January 23, 2013.
4. Ecology Site file for VCP # NW 2415.
5. Ecology Site file for VCP# NW 1324.

Those documents are kept in the Central Files of Northwest Regional Office (NWRO) of Ecology for review by appointment only. You can make an appointment by calling the NWRO resource contact at 425-649-7239.

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 action** is necessary to cleanup 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 insufficient to establish cleanup standards and select a cleanup action. The Site is described above and in **Enclosure A**.

The Site has been characterized for Tetrachlorethylene in soil, groundwater, sub slab soil vapor and indoor air. The results of characterization are depicted in **Enclosure A** and described in **Enclosure A**.

2. Establishment of cleanup standards.

a. Cleanup levels.

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

The cleanup levels are as follows:

Tetrachlorethylene Groundwater:	5 ug/l
Tetrachlorethylene into the Soil:	0.05 mg/kg
Tetrachlorethylene into indoor air:	9.6 ug/m ³

The Groundwater cleanup level is for the beneficial use of drinking water. The Soil level is for the protection of Groundwater for the beneficial use of Groundwater. The indoor air level is protective of human health from indoor air via the soil vapor pathway.

b. Compliance points

Standard compliance points are as followed:

Soil: From the ground surface to the uppermost Groundwater.

Groundwater: From the uppermost level of the saturated zone Extending vertically to the lowermost depth, which could potentially be affected by the Site.

Indoor Air: Though the breathing zone of the building(s) on Site.

3. Selection of cleanup action.

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

Natural attenuation of soil and groundwater meet the minimum requirements of WAC 173-340-360 (2) by providing a permanent solution to the extent practicable. Please refer to document No. 1 above for natural attenuation report.

The sub slab depressurization system has protects the indoor air pathway by mitigating soil vapor derived from the contaminant releases to the subsurface. Please refer to document No. 1 for the depressurization report.

4. Cleanup.

Natural attenuation of soil and groundwater is established by four consecutive quarters of groundwater below the cleanup level. **Please refer to Enclosure A.**

A sub slab depressurization system was installed in December 2009 and remains in operation. Indoor air is demonstrated to be below the cleanup level. The depressurization system can be terminated upon receipt of this letter. Please refer to **Enclosure A.**

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.

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).

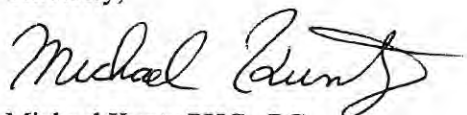
Termination of Agreement

Thank you for cleaning up the Site under the Voluntary Cleanup Program (VCP). This opinion terminates the VCP Agreement governing this project # NW2693.

Mr. Thomas Markl
August 14, 2014
Page 5

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 at 360-407-7239 or mkun461@ecy.wa.gov.

Sincerely,

A handwritten signature in black ink that reads "Michael Kuntz". The signature is written in a cursive style with a long, sweeping underline.

Michael Kuntz PHG., PG.
HQ-Toxics Cleanup

Enclosures: A – Description and Diagrams of the Site

cc: Brani Jurista, Farallon Consultants
 Dolores Mitchell, Ecology

Enclosure A

Description and Diagrams of the Site, Relevant Properties, and Sources.

The Site is located in the southeastern portion of the Redmond Center Property. The site contains the 15946 Redmond Way building is a masonry slab-on-grade structure built in 2009 and located on the northwest corner of the intersection of Redmond Way and 160th Avenue Northeast. The irregular-shape building roughly 70 by 190 feet consists of approximately 13,500 square feet of single story retail space that is surrounded by concrete walkways and an asphalt-paved parking area north of the building. Currently the building is occupied by two restaurants and four retailers, including a bank, a candy shop, a dentist office, and a pet store.

Please refer to Exhibit No. 1 for the Site.

The Redmond Center Property (King County Tax Assessor Parcel No. 7198900080) is 6.93 acres in size, zoned commercial, and developed with two single-story commercial strip mall masonry buildings, a single-story commercial wood-frame building, and associated parking lot. Please refer to Exhibit No. 1 for the Redmond Center Property.

The Redmond Shopping Center Property is located approximately 250 feet upgradient from the Redmond Center Property. Please refer to Exhibit No. 1 for Redmond Shopping Center Property.

Exhibit No. 1: Map of site, relevant properties, and sources.

Exhibit No. 2: Construction drawing for Monitoring Well No. 11

Exhibit No. 3: Construction drawing for Monitoring Well No. 10

Exhibit No. 4: Groundwater Elevation Measurements for Monitoring Well No. 11

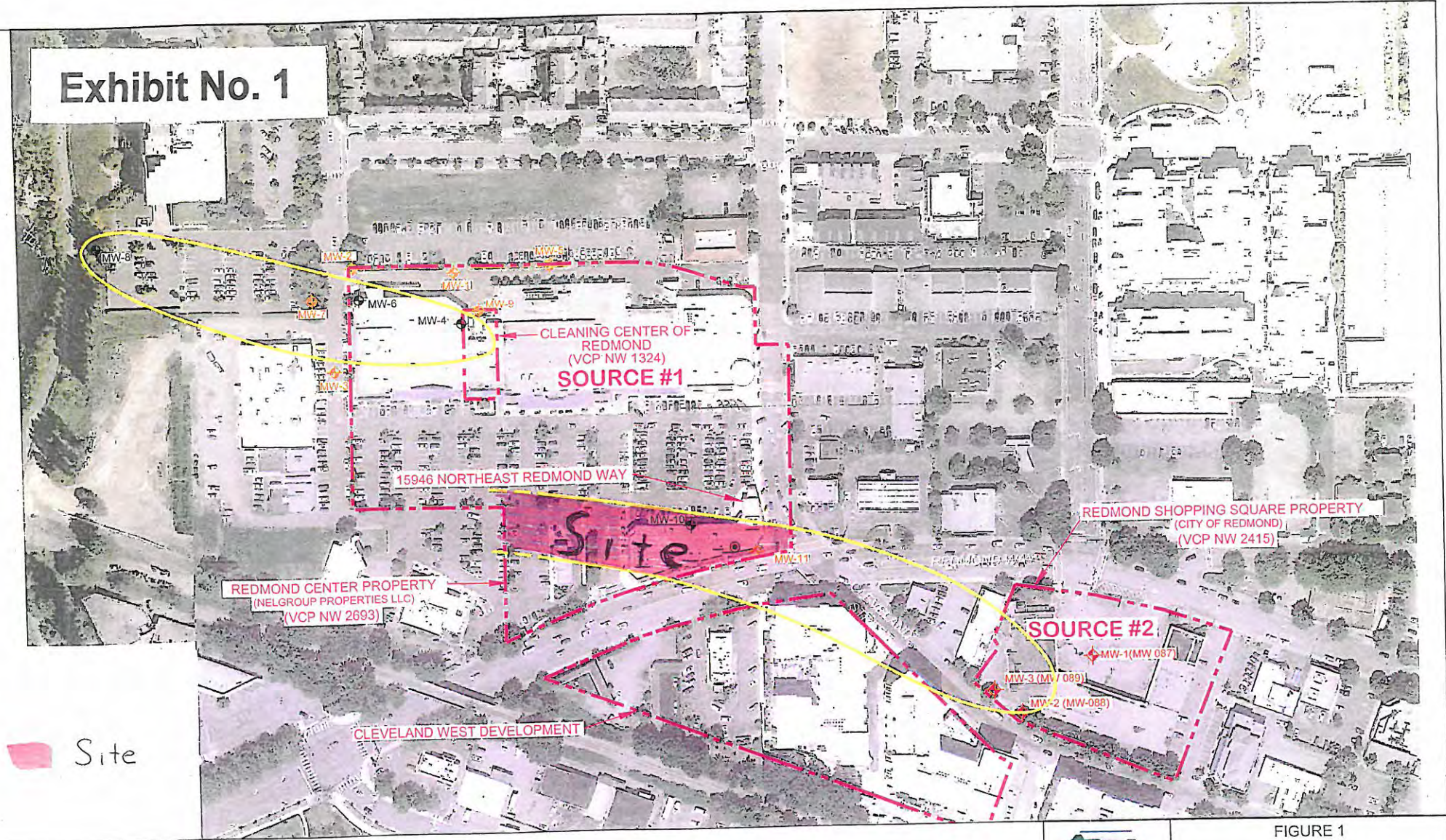
Exhibit No. 5: Groundwater Monitoring Data for Monitoring Well Nos. 10 and 11

Exhibit No. 6: Plan view of the sub-slab depressurization system

Exhibit No. 7: Diagrams of the sub-slab depressurization system

Exhibit No. 8: Sub Slab Analytical Results




Exhibit No. 1






 Site

LEGEND

REDMOND CENTER AND REDMOND MALL SAMPLE LOCATIONS

-  MONITORING WELL (REDMOND CENTER)
-  SUB-SLAB GAS SAMPLING PROBE LOCATION
-  DECOMMISSIONED MONITORING WELL

REDMOND SHOPPING SQUARE (CITY OF REDMOND) SAMPLE LOCATIONS

-  MONITORING WELL
-  FORMER EXTENT OF TETRACHLORETHENE PLUMES IN GROUNDWATER, DASHED WHERE INFERRED
-  VCP VOLUNTARY CLEANUP PROGRAM

0 120
APPROXIMATE SCALE IN FEET



FARALLON CONSULTING
975 5th Avenue Northwest
Issaquah, WA 98027

FIGURE 1

SITE PLAN
REDMOND CENTER PROPERTY AND
REDMOND SHOPPING SQUARE PROPERTY
REDMOND, WASHINGTON

FARALLON PN: 650-007

Drawn By: DEW | Checked By: CS | Date: 7/25/14 | Disk Reference: aerial-10



Exhibit No. 2

Log of Boring: MW-11

975 5th Avenue Northwest
Issaquah, Washington 98027

Client: NREM, LLC
Project: Redmond Center
Location: Redmond, WA

Date/Time Started: 12/30/09 1015
Date/Time Completed: 12/30/09 1035
Equipment: LA HSA
Drilling Company: CDI
Drilling Foreman: Curtis Askew
Drilling Method: HSA

Sampler Type: 18" Split Spoon
Drive Hammer (lbs.): 340
Depth of Water ATD (ft bgs): 12
Total Boring Depth (ft bgs): 20
Total Well Depth (ft bgs): 20

Farallon PN: 650-007

Logged By: D. Clement

Depth (feet bgs.)	Sample Interval	Lithologic Description	USCS	USGS Graphic	% Recovery	Blow Counts 8/8/8	PID (ppm)	Sample ID	Sample Analyzed	Boring/Well Construction Details
0		Concrete from 0 to 0.5, 0.5 to 5 vac trucked out for utility clearance.								Concrete
5		Well-graded SAND with gravel (60% sand, 35% gravel, 5% silt), fine to coarse sand, fine gravel, brown, moist, no odor.	SW		60	16 / 50 for 4	0.0			Bentonite
										Casing
10		Well-graded SAND with gravel (75% sand, 20% gravel, 5% silt), fine to coarse sand, fine gravel, brown, moist, no odor.	SW		100	22 / 50 for 6	0.0			Sand Pack
15		Well-graded SAND (90% sand, 5% gravel, 5% silt), fine to coarse sand, fine gravel, brown, wet, no odor.	SW		100	20 / 50 for 4	0.0			Screen
20		Well-graded SAND (95% sand, 5% silt), fine to coarse sand, brown, wet, no odor.	SW		100	30 / 50 for 6	0.0			

Well Construction Information			Ground Surface Elevation (ft):	39.28
Monument Type: Flush mount	Filter Pack: 2/12 Sand Pack	Top of Casing Elevation (ft):	38.88	
Casing Diameter (inches): 2	Surface Seal: Concrete	Boring Abandonment:	NA	
Screen Slot Size (inches): 0.010	Annular Seal: Bentonite	Surveyed Location: X: 1321572.7 Y: 248883.1		
Screened Interval (ft bgs): 10-20				



Exhibit No. 3

Log of Boring: MW-10

Client: Nelson Real Estate Mngmnt
Project: Cleaning Center of Redmond
Location: Redmond, WA

Date/Time Started: 06/20/07 0745
Date/Time Completed: 06/20/07 0930
Equipment: CME 75
Drilling Company: Cascade Drilling
Drilling Foreman: James Goebel
Drilling Method: Hollow Stem Auger

Sampler Type: D&M SS 18"x2"
Drive Hammer (lbs.): 300
Depth of Water ATD (ft bgs): 16.5
Total Boring Depth (ft bgs): 26.5
Total Well Depth (ft bgs): 25

Farallon PN: 650-001

Logged By: D. Clement

Depth (feet bgs.)	Sample Interval	Lithologic Description	USCS	USGS Graphic	% Recovery	Blow Counts 8/8/8	PID (units)	Sample ID	Sample Analyzed	Boring/Well Construction Details
0										Cap
										Grout
										Casing
5		5'-6.5' SAND, fine to coarse, with fine to coarse gravel, light brown, medium dense, moist, no odor	SW			10012/15/16	673	MW10-6		
										Bentonite
10		10'-11.5' SAND, fine to coarse, minor fine gravel and silt, dark reddish-brown, medium dense, moist, no odor	SW			10015/15/14	754	MW10-11		
										Screen
15		Sampler broke in boring, drill to 25 feet below ground surface.								
20										Sand
25		25'-26.5' SAND, fine to coarse, mostly coarse, minor silt, dark brown, medium dense, wet, no odor	SP			5014/16/16	81.0	MW10-26		

Well Construction Information

Monument Type: Flush mount
Casing Diameter (inches): 2
Screen Slot Size (inches): 0.010
Screened Interval (ft bgs): 10-25

Filter Pack: Sand
Surface Seal: Cement
Annular Seal: Bentonite

Ground Surface Elevation (ft): NA
Top of Casing Elevation (ft): NA
Boring Abandonment: NA
Surveyed Location: X: NA Y: NA

Exhibit No. 4

Table 1
Summary of Groundwater Elevation Measurements
Redmond Center Property
Redmond, Washington
Farallon PN:650-009

Well Identification	Date	Top of Well Casing Elevation (feet) ¹	Depth to Water (feet) ²	Groundwater Elevation (feet) ¹
MW-11	1/22/2010	39.28	10.77	28.51
	10/26/2011		13.82	25.46
	6/17/2013		13.89	25.39
	9/13/2013		14.52	24.76
	12/11/2013		13.01	26.27
	3/18/2014		11.15	28.13

NOTES:

¹ In feet above mean sea level.

² In feet below top of casing.

Exhibit No. 5

Table 2
Groundwater Analytical Results for Monitoring Wells MW-10 and MW-11
Redmond Center Property
Redmond, Washington
Farallon PN: 650-007

Well Identification	Sample Identification	Sample Date	Analytical Results (micrograms per liter) ¹			
			Tetrachloroethene	Trichloroethene	cis-1,2-Dichloroethene	Vinyl Chloride
MW-10 ² (Well Decommissioned)	MW10-GW062207	6/22/2007	7.4	0.48	<0.20	<0.20
	MW10-051608	5/16/2008	6.4	0.37	<0.20	<0.20
	MW11-111208	11/12/2008	11	0.91	0.33	<0.20
	MW-10-021309	2/13/2009	15	2.0	0.57	<0.20
MW-11	MW11-012210	1/22/2010	2.0	<0.20	<0.20	<0.20
	MW11-102611	10/26/2011	1.6	<0.20	<0.20	<0.20
	MW-11-061713	6/17/2013	1.6	<0.20	<0.20	<0.20
	MW-11-091313	9/13/2013	1.6	<0.20	<0.20	<0.20
	MW-11-121113	12/11/2013	1.7	<0.20	<0.20	<0.20
	MW-11-031814	3/18/2014	1.0	<0.20	<0.20	<0.20
MTCA Cleanup Levels for Groundwater³			5	5	16⁴	0.2

NOTES:

< indicates analyte not detected at or above the laboratory practical quantitation limit shown.

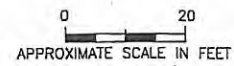
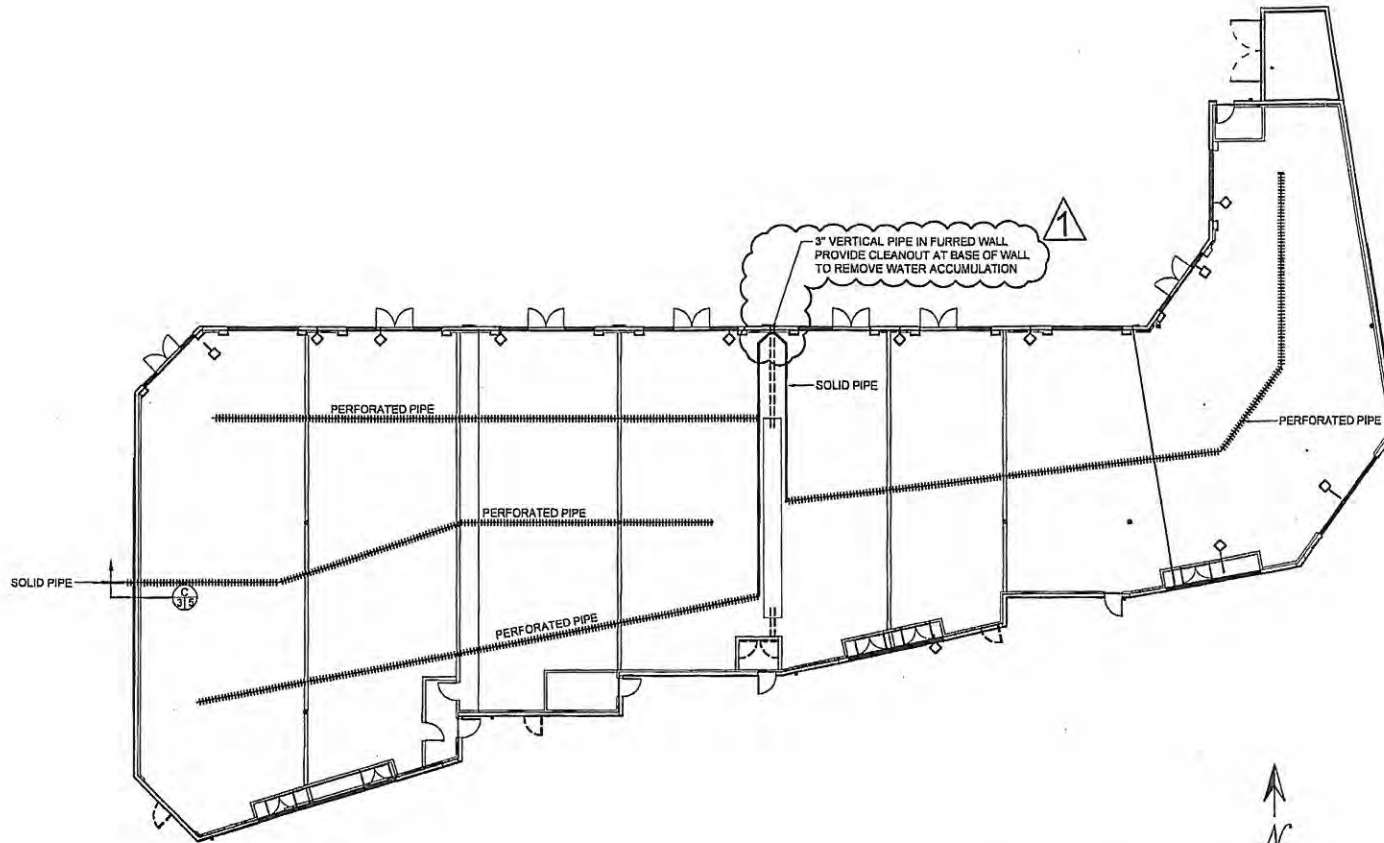
¹ Analyzed by U.S. Environmental Protection Agency Method 8260B or 8260C.

² Monitoring well MW-10 decommissioned on February 16, 2009 as part of the Redmond Center redevelopment project.

³ Washington State Model Toxics Control Act Cleanup Regulation (MTCA) Method A Cleanup Levels for Groundwater, Table 720-1 of Section 900 of Chapter 173-340 of the Washington Administrative Code, as revised November 2007.

⁴ Washington State Model Toxics Control Act Cleanup Regulation Cleanup Levels and Risk Calculations, Standard Method B Values for Groundwater, <https://fortress.wa.gov/ccy/clarc/Reporting/ChemicalQuery.aspx>.

Exhibit No. 6



REV	DATE	DESCRIPTION	BY	CKD.	APP.
Δ	2/23/2009	ISSUED FOR CONSTRUCTION	DEW/SB	RM	CM
	2/17/2009	ISSUED FOR BIDDING	DEW/SB	RM	CM

PREPARED BY

FARALLON CONSULTING
 975 5th Avenue Northwest
 Issaquah, WA 98027

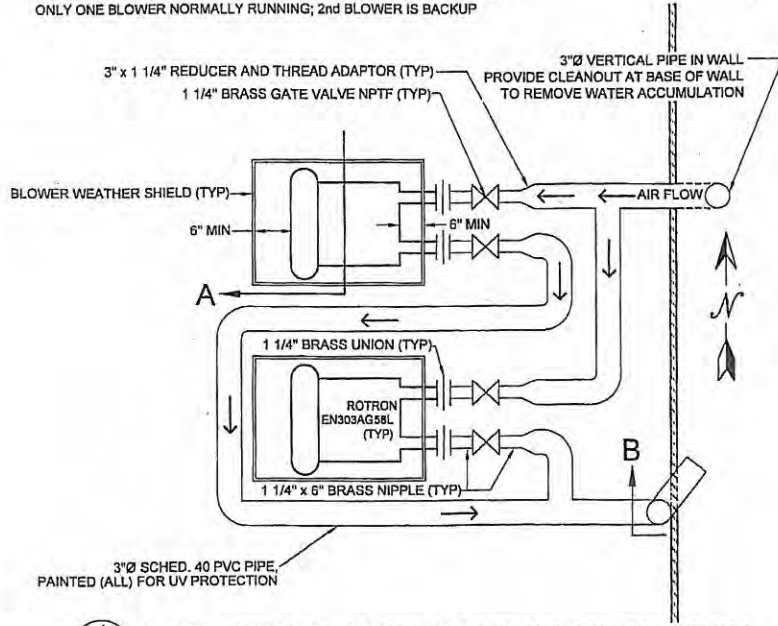
PREPARED FOR
 NEL GROUP PROPERTIES L.L.C.
 PO BOX 461
 REDMOND, WASHINGTON 98073

REDMOND CENTER
 SUB-SLAB DEPRESSURIZATION SYSTEM
 REDMOND, WASHINGTON
**SUB-SLAB
 DEPRESSURIZATION
 SYSTEM LAYOUT**

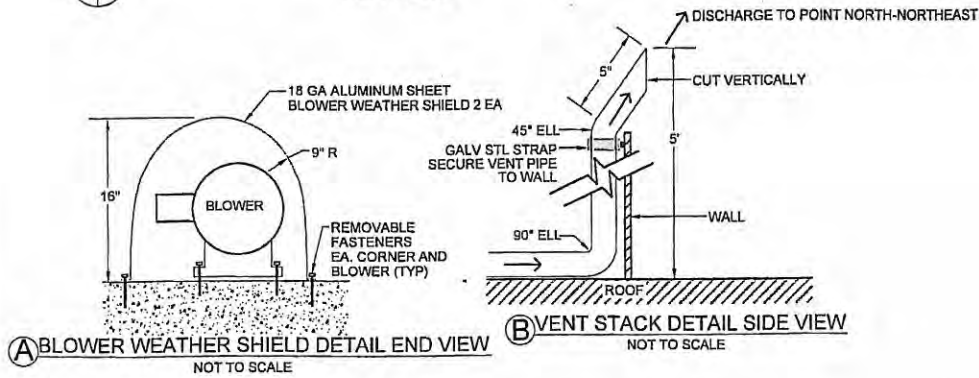
SCALE AS SHOWN	PROJECT NO. 050007
FILE NAME SYSTEM.dwg	SHEET NO. OF
3	5

Exhibit No. 7

ELECTRICAL NOTE:
EACH BLOWER TO BE CONTROLLED BY SEPARATE ON-OFF AUTO SWITCH
ONLY ONE BLOWER NORMALLY RUNNING; 2nd BLOWER IS BACKUP

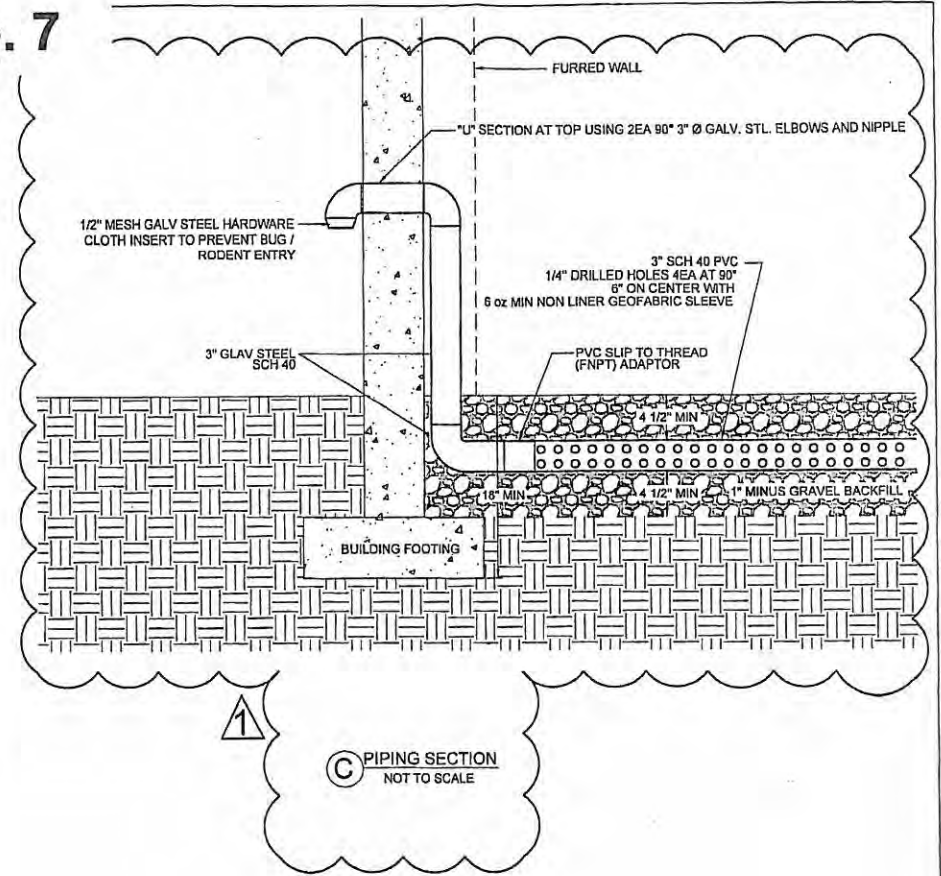


1
54 DEPRESSURIZATION SYSTEM BLOWER AND CONTROLS DETAIL
NOT TO SCALE

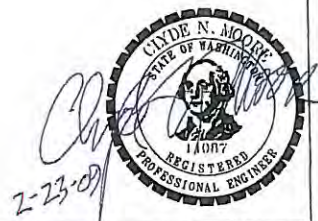


A BLOWER WEATHER SHIELD DETAIL END VIEW
NOT TO SCALE

B VENT STACK DETAIL SIDE VIEW
NOT TO SCALE



C PIPING SECTION
NOT TO SCALE



REV	DATE	DESCRIPTION	BY	CKD.	APP.
Δ	2/23/2009	ISSUED FOR CONSTRUCTION	DEW/SB	RM	CM
	2/11/2009	ISSUED FOR BIDDING	DEW/SB	RM	CM

PREPARED BY
FARALLON CONSULTING
975 5th Avenue Northwest
Issaquah, WA 98027

PREPARED FOR
NEL GROUP PROPERTIES L.L.C.
PO BOX 481
REDMOND, WASHINGTON 98073

**REDMOND CENTER
SUB-SLAB DEPRESSURIZATION SYSTEM
REDMOND, WASHINGTON**

DETAILS

SCALE	AS SHOWN
PROJECT NO.	050-007
FILE NAME	SYSTEM.dwg
SHEET NO.	OF
5	5

Exhibit No. 8

Table 1
Sub-Slab Soil Gas Analytical Results for PCE, TCE, and Vinyl Chloride
Redmond Center Property
Redmond, Washington
Farallon PN: 650-007

Sample Location	Sample Identification	Sample Date	Analytical Results (micrograms per cubic meter) ¹		
			PCE	TCE	Vinyl Chloride
Bank Vault	FAR-1-917	1/26/2012	45	0.52	1.0
Bank Vault	FAR-34086-051712	5/17/2012	100	<0.20	1.3
Modified MTCA Method B Screening Levels for Soil Gas (Commercial)			501.7^{2,3}	19.4^{2,3}	14.7²

NOTES:

< denotes analyte not detected at or above the reporting limit listed.

¹ Analyzed by U.S. Environmental Protection Agency (EPA) Method TO-15.

² Washington State Model Toxics Control Act Cleanup Regulation (MTCA) Method B Soil Gas Screening Levels for Indoor Air modified for commercial setting. Calculations are shown in Table 2 of this letter report.

³ Modified MTCA Method B Soil Gas Screening Levels based on forthcoming changes to be presented in an update to the Cleanup Levels and Risk Calculations (CLARC) database. These changes are based on February 2012 updates to the EPA Integrated Risk Information System (IRIS) database regarding toxicological data for these compounds.

PCE = tetrachloroethene

TCE = trichloroethene

APPENDIX B
SITE CLOSURE REPORT

SITE CLOSURE REPORT ADDENDUM
Former Cleaning Center of Redmond
15796 Redmond Way
Redmond, Washington

Farallon PN: 650-001

SITE CLOSURE REPORT

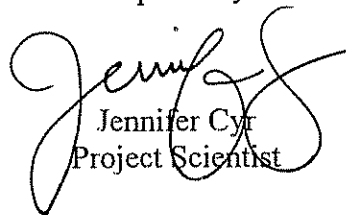
**CLEANING CENTER OF REDMOND
15796 REDMOND WAY
REDMOND, WASHINGTON
VOLUNTARY CLEANUP PROGRAM NO. NW1324**

**Submitted by:
Farallon Consulting, L.L.C.
975 5th Avenue Northwest
Issaquah, Washington 98027
Farallon PN: 650-001**

**For:
Nelson Real Estate Management LLC
P.O. Box 461
Redmond, Washington 98073-0461**

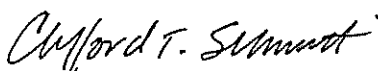
September 21, 2007

Prepared by:



Jennifer Cyr
Project Scientist

Reviewed by:



Clifford T. Schmitt, L.G., L.H.G.
Principal



Clifford Thomas Schmitt



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FIGURES

- Figure 1 *Site Location Map*
Figure 2 *Soil Sample Locations and Analytical Results*
Figure 3 *Groundwater Elevation Contours and PCE Concentrations in Groundwater for May 15, 2007*
Figure 4 *Indoor Air Sampling Locations and Analytical Results*

TABLES

- Table 1 *Summary of Soil Sample Analytical Results – HVOCs*
Table 2 *Summary of Groundwater Elevations*
Table 3 *Summary of Groundwater Sample Analytical Results – HVOCs*
Table 4 *Summary of Indoor Air Sample Results*

APPENDICES

- Appendix A Boring Logs
Appendix B Laboratory Analytical Reports



ACRONYMS AND ABBREVIATIONS

bgs	below ground surface
DOH	Washington State Department of Health
Ecology	Washington State Department of Ecology
EPA	U.S. Environmental Protection Agency
Farallon	Farallon Consulting, L.L.C.
HVOCs	halogenated volatile organic compounds
mg/kg	milligrams per kilogram
µg/l	micrograms per liter
µg/m ³	micrograms per cubic meter
MTCA	Washington State Model Toxics Control Act Cleanup Regulation
NIOSH	National Institute for Occupational Safety and Health
OSHA	Occupational Safety and Health Administration
PCE	tetrachloroethene
PEL	permissible exposure limit
Phase II ESA	Phase II Environmental Site Assessment
PID	photoionization detector
PQLs	practical quantitation limits
QA/QC	Quality Assurance/Quality Control
REL	recommended exposure limit
Site	Cleaning Center of Redmond facility, 15796 Redmond Way, Redmond, Washington
SVE	soil vapor extraction
TCE	trichloroethene
WAC	Washington Administrative Code
Work Plan	<i>Site Closure Work Plan, Cleaning Center of Redmond, 15796 Redmond Way, Redmond, Washington</i> dated November 22, 2006, prepared by Farallon



1.0 INTRODUCTION

Farallon Consulting, L.L.C. (Farallon) has prepared this Site Closure Report to document the results of various investigations conducted in 2007 at the Redmond Center property, which includes the Cleaning Center of Redmond facility located at 15796 Redmond Way in Redmond, Washington (herein referred to as the Site) (Figure 1). The investigations were conducted in accordance with the *Site Closure Work Plan, Cleaning Center of Redmond, 15796 Redmond Way, Redmond, Washington* dated November 22, 2006, prepared by Farallon (2006c) (Work Plan), and the Washington State Model Toxics Control Act Cleanup Regulation (MTCA), as established in Chapter 173-340 of the Washington Administrative Code (WAC 173-340), as amended February 12, 2001. Work at the Site is being conducted as an independent cleanup action under the Washington State Department of Ecology (Ecology) Voluntary Cleanup Program. The Site was assigned Identification Number NW1324 by Ecology.

1.1 OBJECTIVE

The objective of the Site closure activities was to address specific data gaps and to conduct confirmation sampling necessary to achieve regulatory closure for the Site. A release of the dry cleaning solvent tetrachloroethene (PCE) was confirmed at the Site in 1999, and a remediation system was installed at the Site in 2003 to address concentrations of halogenated volatile organic compounds (HVOCs) in soil and groundwater. Performance monitoring data collected at the Site in 2006 indicated that the remediation system was effective, and the prior release of PCE at the Cleaning Center of Redmond no longer represented a threat to human health or the environment.

Representatives of Ecology, Farallon, and Nelson Real Estate Management LLC, agent for Nelgroup Properties LLC, the owner of the Redmond Center property, attended a meeting on September 18, 2006 to discuss issues regarding the characterization of conditions at the Site that were raised by Ecology (2006) in a letter dated June 2, 2006. A letter dated September 27, 2006 prepared by Farallon (2006b) summarized the September 18 meeting, and listed several issues that Ecology requested be further investigated prior to consideration of the Site for regulatory closure, including:

- Soil conditions at the location of the former Redmond One Hour Cleaners, which was located in the eastern portion of the current QFC grocery store;
- Soil conditions in the vicinity of the former dry cleaning machine at the Cleaning Center of Redmond facility to confirm that soil met the cleanup levels;
- Evaluation of HVOCs in groundwater at the southeastern corner of the Redmond Center property;
- Groundwater quality at the point of compliance wells for the Site to confirm that groundwater met the cleanup levels; and
- Indoor air down-gradient of the Cleaning Center of Redmond facility to assess the potential for the soil vapor pathway to impact indoor air quality.



The investigations conducted by Farallon in 2007 addressed each of these issues. The scope and results of the investigations are presented in this Site Closure Report.

1.2 REPORT ORGANIZATION

This report summarizes background information for the Site and presents the results of the investigations conducted in 2007. This report is organized into seven sections:

Section 1 – Introduction. This section presents an overview and the objective of the Site closure activities.

Section 2 – Background. This section presents a description of the Site features, history, geology, and hydrogeology; and a summary of previous investigations conducted at the Site.

Section 3 – Site Closure Activities. This section presents the scope of work and field activities for the various investigations conducted in 2007.

Section 4 – Results. This section presents the results of the Site Closure activities.

Section 5 – Conclusions. This section presents Farallon’s conclusions pertaining to the Site Closure activities.

Section 6 – References. This section lists the documents cited in this Site Closure Report.

Section 7 – Limitation. This section presents Farallon’s standard limitation.



2.0 BACKGROUND

The following subsections provide a description of the Site, a summary of the previous investigations conducted at the Site by Farallon and others, and the Site geology and hydrogeology. The information summarized in this section was obtained from reports prepared by various consultants referenced in Section 6, and from observations made by Farallon during the various investigation activities documented in this report.

2.1 SITE DESCRIPTION

The Site is located at 15796 Redmond Way in Redmond, Washington in a single-story, commercial strip mall of masonry construction (Figure 2). According to King County Tax Assessor records, the strip mall building was constructed in various stages from 1966 through the early 1980s (King County, Washington 2005). Several remodels have occurred since the early 1980s, with the most recent being a significant expansion near the western end of the strip mall building in 2002. Asphalt-paved parking areas with landscaping strips are located north and south of the Site building. The strip mall is bordered on the west by 158th Avenue South and on the east by 160th Avenue Northeast.

The Cleaning Center of Redmond has operated as a dry cleaning facility or dry cleaning drop-off facility from approximately 1990 to the present. In a January 2005 personal communication with Farallon, Ms. Carol Sarna, a business consultant with a long-term relationship with Nelgroup Properties LLC, stated that a steel pan for the containment of potential spills of PCE was placed beneath the dry cleaning machine at the Cleaning Center of Redmond in 1999 (Farallon 2005). Use of PCE was discontinued when the dry cleaning machine was removed in October 2002, at which time the facility became a drop-off-only location for dry cleaning. Regular laundry services are still performed at the Cleaning Center of Redmond.

According to the U.S. Geological Survey (1982) topographic map *Bellevue North, Washington* dated 1982, the Site is at an elevation of approximately 40 feet above mean sea level and is relatively flat. Regional topography in the vicinity slopes to the west. The Sammamish River is located approximately 600 feet west of the Site.

2.2 PREVIOUS INVESTIGATIONS

The environmental reports documenting the investigations at the Site that were reviewed by Farallon are listed in Section 6, References. A summary of the reports reviewed is provided below.

Alisto Engineering Group (1999) performed fieldwork at the Site in 1999 to assess whether a release of PCE from Site operations may have occurred. The assessment involved drilling four borings in the vicinity of the former Cleaning Center of Redmond dry cleaning machine to collect soil samples for laboratory analysis. A reconnaissance groundwater sample also was collected from one of the borings. The results of the assessment indicated that concentrations of PCE in soil and groundwater, and concentrations of trichloroethene (TCE) in groundwater at the



Site exceeded the MTCA Method A cleanup levels for soil and groundwater. The presence of PCE and TCE was attributed to releases from dry cleaning operations at the Site. Alisto Engineering Group did not perform an assessment of groundwater quality up-gradient of the Site to confirm that no other sources were affecting groundwater quality at the Site.

GeoEngineers, Inc. (2001) conducted a Phase II Environmental Site Assessment (Phase II ESA) at the Site in 2000 to further delineate the vertical and lateral extent of HVOCs exceeding the MTCA Method A cleanup levels in soil and groundwater. The Phase II ESA involved drilling 11 borings to collect soil and reconnaissance groundwater samples, and installing monitoring wells MW-1 through MW-8. Soil samples collected from two borings located south and east of the former Cleaning Center of Redmond dry cleaning machine contained concentrations of PCE exceeding 0.5 milligrams per kilogram (mg/kg). The distribution of HVOCs in groundwater was bounded to the north-northeast, south, and west of the Site. None of the monitoring wells or reconnaissance groundwater sampling points was located directly up-gradient of the Cleaning Center of Redmond to assess whether an off-Site source was contributing to groundwater contamination.

Farallon began monitoring groundwater conditions at the Site in December 2000 to document the trend of PCE concentrations over time, and to assess whether concentrations of PCE would decrease to below MTCA Method A cleanup levels through natural attenuation within a reasonable time frame. In 2003, monitoring wells MW-4 and MW-6 were decommissioned due to expansion of the strip mall building, and monitoring well MW-9 was installed in close proximity to the confirmed PCE source to replace monitoring well MW-4. Farallon conducted a total of 13 groundwater monitoring events between December 2000 and May 2007.

Farallon installed a soil vapor extraction (SVE) well through the concrete slab inside the Cleaning Center of Redmond in August 2003. The SVE well was installed to facilitate operation of an SVE system to remove concentrations of PCE in soil at the source area adjacent to the former location of the dry cleaning machine at the Cleaning Center of Redmond. It was anticipated that operation of the SVE system would eliminate or sufficiently decrease the flux of PCE from the source in the vadose (unsaturated) zone to groundwater, making active remediation of groundwater contamination unnecessary.

Since operation of the SVE system began at the facility in August 2003, concentrations of PCE in groundwater have declined. Concentrations of PCE in groundwater at the existing monitoring wells were below the MTCA Method A cleanup level for both the February and August 2006 monitoring events, prior to commencing the work described in the Work Plan.

Farallon (2005) conducted a limited subsurface investigation in December 2004 that consisted of advancing five direct-push borings at up-gradient and cross-gradient positions on the Site relative to the Cleaning Center of Redmond facility, and collecting reconnaissance groundwater samples from the boring locations. The locations of the borings are shown on Figure 4 of the Limited Subsurface Investigation Report (Farallon 2005). The limited subsurface investigation was conducted to assess whether an up-gradient, off-Site source was contributing to groundwater contamination at the Site. Reconnaissance groundwater samples were collected from depths ranging from 10 to 22 feet below ground surface (bgs) in the borings, and were analyzed for



HVOCs by U.S. Environmental Protection Agency (EPA) Method 8260B. The reconnaissance groundwater samples collected from two borings located at the southeastern corner of the Redmond Center property contained concentrations of PCE exceeding the MTCA Method A cleanup level. The reconnaissance groundwater analytical results suggest that a plume of PCE in groundwater emanating from an up-gradient off-Site source is present in the southern portion of the Redmond Center property.

Farallon (2006a) conducted an assessment of deep groundwater quality in August 2006 that was performed in response to the letter from Ecology dated June 2, 2006 that stated “the vertical extent of contamination, in particular tetrachloroethene, in groundwater above the cleanup level(s) has not been determined,” among other opinions. The assessment of deep groundwater quality included collection of reconnaissance groundwater samples from hollow-stem auger boring FB-1, advanced down-gradient to monitoring well MW-7 to a depth of 70 feet bgs. Reconnaissance groundwater samples were collected from boring FB-1 at 12.5, 31.5, and 68.5 feet bgs during drilling. The reconnaissance groundwater samples were collected by advancing a temporary well point with a 3-foot screen in front of the auger at the desired sampling depth. Approximately three casing volumes of water was purged from each temporary monitoring well to remove sediment and debris and create a hydraulic connection between the well screen and the surrounding water-bearing zone. The analytical results for PCE in all three of the reconnaissance groundwater samples collected were reported to be below the MTCA Method A cleanup level of 5 micrograms per liter ($\mu\text{g/l}$) for PCE, indicating that concentrations of PCE in groundwater attenuate with depth (Figure 3).

2.3 GEOLOGY AND HYDROGEOLOGY

The Puget Sound region is underlain by Quaternary sediments deposited during glacial episodes (Galster and Laprade 1991). Deposition occurred during a number of glacial advances and retreats, which created the existing subsurface conditions. The regional sediments consist primarily of interlayered and/or sequential deposits of alluvial clays, silts, and sands that typically are situated over deposits of glacial till that consist of silty sand to sandy silt with gravel. Outwash sediments consisting of sands, silts, clays, and gravels were deposited by rivers, streams, and post-glacial lakes during the glacial retreats. With the exception of the most recent recessional deposits, the outwash sediments have been over-consolidated by the overriding ice sheets.

Shallow soil encountered during Farallon’s subsurface investigation activities in the vicinity of the Site consisted primarily of sand and gravel, with the exception of soil encountered northwest of the strip mall building. The shallow soil at this location included a layer of silt and peat from approximately 2.5 to 8 feet bgs. Underlying the silt and peat was sand and gravel consistent with the other boring locations.

The shallow aquifer appears to be unconfined and extends to a minimum depth of 70 feet bgs on the Site, based on Farallon’s deep boring assessment conducted in August 2006. Groundwater levels measured at the Site on May 15, 2007 ranged from 9.62 to 11.99 feet below the top of the well casings. During the 13 monitoring events conducted by Farallon since 2000, the estimated



groundwater flow direction consistently has been to the west-northwest toward the Sammamish River, similar to the estimated groundwater flow direction depicted on Figure 3.



3.0 SITE CLOSURE ACTIVITIES

The Site closure activities were conducted in May and June 2007 in accordance with the Work Plan, and involved collecting soil, groundwater, and indoor air samples, as directed by Ecology, to address data gaps and provide confirmation data for Site closure.

3.1 SCOPE OF WORK FOR SITE CLOSURE ACTIVITIES

The scope of work for the Site closure activities included the following work elements:

- Preparing a Health and Safety Plan in accordance with MTCA and Part 1910.120 of Title 29 of the Code of Federal Regulations prior to initiating field activities;
- Performing conductible and non-conductible utility locates at the proposed boring locations using a private utility location service and contacting the One-Call Center for utility location;
- Advancing interior direct-push borings FB-1 and FB-2 at the location of the former Redmond One Hour Cleaners;
- Advancing exterior (FB-3) and interior (FB-4 and FB-5) direct-push borings at the Cleaning Center of Redmond facility;
- Installing monitoring well MW-10 at the southeastern corner of the Redmond Center property;
- Submitting a minimum of one soil sample from each boring for laboratory analysis;
- Collecting indoor air samples IA-1 and IA-2 at a tenant space down-gradient of the Cleaning Center of Redmond facility;
- Sampling monitoring well MW-10 and submitting the groundwater sample for laboratory analysis;
- Surveying the elevation of the top of the monitoring well MW-10 casing to a common datum; and
- Preparing this Site Closure Report.

A detailed description of the Site closure field activities is provided in the following subsections.

3.2 SOIL ASSESSMENT AND MONITORING WELL INSTALLATION

Field activities to assess soil conditions and install a monitoring well were conducted under the supervision of a Farallon Scientist and in accordance with the Work Plan, except as noted below. Prior to the commencement of drilling, a private utility location survey was conducted by Applied Professional Service, Incorporated of North Bend, Washington to locate on-Site conductible and non-conductible utilities. Cascade Drilling of Woodinville, Washington performed the drilling activities using limited-access direct-push and hollow-stem-auger drilling rigs. An exclusion zone was set up around the drill rig and sampling locations at indoor drilling



locations to prevent access by the public or tenants. Each drilling area was restored to pre-existing conditions. Work at the former Redmond One Hour Cleaners location (currently a QFC grocery store) was conducted during the late evening/early morning to minimize disruption of business operations.

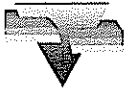
Four of the five borings drilled to assess soil conditions (borings FB-1, FB-2, FB-4, and FB-5) were sampled continuously from the ground surface to depths ranging from 4 to 12 feet bgs. Boring FB-3 was located north of the Cleaning Center of Redmond facility in an area containing several underground utilities. To avoid damaging the utilities, a vactor truck was used to remove soil from boring FB-3 to a depth of 8.5 feet bgs, and a hand-auger was used to collect soil samples at varying intervals from the ground surface to 8.5 feet bgs, after which the drill rig was used to the maximum depth explored. The direct-push sampler was lined with a disposable acetate sleeve that was removed and opened to reveal the sample after driving each 4-foot sample interval.

Soil samples were collected from boring MW-10 at approximately 5-foot intervals during advancement, to a total depth of 25 feet bgs. The monitoring well was constructed of 2-inch-diameter blank polyvinyl chloride casing flush-threaded to 15 feet of 0.010-inch slotted well screen. The bottom and top of the well were fitted with a threaded polyvinyl chloride bottom cap and a locking compression-fit well cap, respectively. The annulus of the borehole was filled with #12/10 silica sand to 1 foot above the top of the screened interval. A 6-foot bentonite seal was installed above the sand pack. The monitoring well was completed at the surface with a flush-mounted, traffic-rated well box set in concrete. Each boring was backfilled with bentonite chips and capped with either asphalt or concrete to match the surface grade, with the exception of flooring materials, where applicable.

The soil samples were described in accordance with the Unified Soil Classification System and screened in the field for potential evidence of contamination using visual observation, notation of odor, and a photoionization detector (PID) to detect the presence of volatile organic vapors. The soil descriptions and PID readings were recorded on the boring logs, which are provided in Appendix A.

Soil samples collected from the borings were transferred directly into laboratory-prepared sample containers. Each soil sample consisted of a 4-ounce laboratory-prepared glass soil sample container that was completely filled to eliminate headspace. In addition, a sample from each sampling interval was collected according to EPA Method 5035A. Care was taken not to handle the seal or inside cap of the container when placing the sample into the containers. The sample containers were clearly labeled, using the unique sample number designation and labeling protocol described in the Work Plan.

The soil samples were submitted to OnSite Environmental Inc. of Redmond, Washington for laboratory analysis of HVOCs using EPA Method 8260B. At the request of Ecology, three soil samples per boring were analyzed when possible, with the exception of the monitoring well boring, for which one sample was analyzed for waste disposal purposes.



All non-dedicated field sampling equipment was cleaned and decontaminated between each use and prior to leaving the Site. Soil cuttings, purge water, and decontamination wash water were contained on Site in labeled 55-gallon drums pending waste profiling and proper disposal.

3.2.1 Former Redmond One Hour Cleaners

Borings FB-1 and FB-2 were advanced at the location of the former Redmond One Hour Cleaners, in the eastern portion of the current QFC grocery store in Redmond Center (Figure 2). The purpose of the borings was to assess whether a release of PCE had occurred at the location of the former Redmond One Hour Cleaners. The two borings were placed in the estimated vicinity of the former dry cleaning machine. Borings FB-1 and FB-2 were advanced to 10 and 4 feet bgs, respectively, prior to drill refusal due to dense soils. The three soil samples collected from boring FB-1 and the single soil sample collected from boring FB-2 were submitted for laboratory analysis.

The Work Plan stated that up to four borings would be advanced at the former Redmond One Hour Cleaners facility. Only two borings were advanced due to the presence of dense soils that did not permit advancement of the borings to the planned depth. It is Farallon's opinion that the samples collected from the two boring locations are representative of subsurface conditions in the targeted area.

3.2.2 Cleaning Center of Redmond

Farallon installed an SVE system to remove residual concentrations of PCE in the unsaturated soil above the groundwater table, and conducted periodic groundwater monitoring events to document concentrations of PCE in groundwater over time. The SVE system operated from August 2003 to August 2006. The purpose of the confirmation soil sampling conducted at the Cleaning Center of Redmond facility was to assess whether concentrations of HVOCs in subsurface soil still exceed MTCA Method A or B cleanup levels after 3 years of SVE system operation.

Boring FB-3 was located north of the Cleaning Center of Redmond, at the closest accessible location to former monitoring well MW-4 (Figure 2). The analytical result for a soil sample collected during installation of MW-4 indicated that a concentration of PCE exceeded the MTCA Method A cleanup level. Borings FB-4 and FB-5 were located adjacent to the former dry cleaning machine, where prior investigations by others indicated that concentrations of HVOCs in subsurface soil exceeded MTCA Method A and B cleanup levels (Figure 2).

Borings FB-3, FB-4, and FB-5 were advanced to 11, 12, and 8 feet bgs, respectively. Boring FB-5 was abandoned at 8 feet bgs due to pea gravel sloughing into the boring. Three soil samples per boring were selected for laboratory analysis. The samples collected from depths similar to those for the investigation conducted by GeoEngineers, Inc. (2001) were selected for laboratory analysis to enable comparison between past and current results.

3.2.3 Redmond Center

Monitoring well MW-10 was located at the southeastern corner of Redmond Center to evaluate the concentrations of HVOCs in groundwater migrating onto the Redmond Center property from



an up-gradient off-Site source (Figure 2). A single soil sample was collected from the vadose zone of monitoring well MW-10 for waste disposal characterization.

Monitoring well MW-10 was developed with the use of a submersible pump. Monitoring well development consisted of surging and purging the wells until a minimum of 10 submerged well volumes were removed and groundwater no longer appeared turbid.

3.3 GROUNDWATER SAMPLING

Groundwater sampling field activities were conducted in accordance with the Work Plan and consisted of a quarterly confirmation groundwater monitoring event, and sampling groundwater at newly installed monitoring well MW-10. The confirmation groundwater monitoring event and sampling at monitoring well MW-10 included the following tasks:

- Measuring the depth to groundwater in each monitoring well;
- Purging groundwater using EPA low-flow sampling protocols prior to collecting groundwater samples; and
- Submitting the groundwater samples for laboratory analysis of HVOCs using EPA Method 8260B.

Upon Farallon's arrival at the Site, each monitoring well was opened and the water level in the well was permitted to equilibrate with atmospheric pressure for a minimum of 15 minutes prior to measuring the depth to groundwater. Groundwater levels were measured to an accuracy of 0.01 foot using an electric water-level meter.

Purging and sampling of each monitoring well was performed using a peristaltic pump and dedicated polyethylene tubing at flow rates ranging from 100 to 300 milliliters per minute. The tubing intake was placed at approximately mid-screen in each monitoring well. During purging, water quality was monitored using a YSI 600XL water quality system equipped with a flow-through cell. Water quality was monitored and results were recorded for temperature, pH, specific conductance, dissolved oxygen, turbidity, and oxidation-reduction potential. Each monitoring well was purged until the water quality parameters for temperature, pH, and specific conductance stabilized.

Following purging, groundwater samples were collected from the pump outlet tubing located upstream of the flow-through cell and placed directly into laboratory-prepared sample containers. The containers were placed on ice in a cooler and transported to OnSite Environmental Inc. under standard chain-of-custody protocols for laboratory analysis. The groundwater samples were submitted for analysis of HVOCs using EPA Method 8260B. All purge water generated during the monitoring event was placed in a labeled 55-gallon steel drum and stored temporarily on Site pending disposal.

3.3.1 Confirmation Groundwater Monitoring Event

A groundwater monitoring event was performed on May 15, 2007 to collect the fourth consecutive quarter of confirmation monitoring data at the Redmond Center property. The



purpose of the confirmation groundwater monitoring was to fulfill Ecology's requirement of four consecutive quarters of groundwater quality results below applicable MTCA Method A or B cleanup levels to demonstrate that groundwater quality no longer represents a threat to human health or the environment. Depth to groundwater measurements were collected at Redmond Center property monitoring wells MW-1 through MW-3, MW-5, and MW-7 through MW-9; and at monitoring wells EMW-1 and EMW-2 located on the east-adjacent Echo Cleaners property (Figure 3). Groundwater samples were collected from monitoring wells MW-1 through MW-3, MW-7, and MW-9 for laboratory analysis.

3.3.2 Groundwater Assessment

Monitoring well MW-10 was sampled on June 20, 2007 to assess whether concentrations of HVOCs in groundwater were migrating onto the Redmond Center property from an up-gradient, off-Site source (Figure 3).

The monitoring well elevation was surveyed by Professional Land Surveyors, Inc. of Issaquah, Washington to determine the top of casing elevation to an accuracy of 0.01 foot relative to the City of Redmond Benchmark "RED20," with an elevation of 43.519 feet, as published on the Washington Council of County Surveyors web site during February 2006 (point ID #6035).

3.4 INDOOR AIR SAMPLE COLLECTION

Indoor air samples were collected from a tenant space (Staples store) down-gradient from the Cleaning Center of Redmond on June 12, 2007 to assess whether concentrations of HVOCs may be migrating from groundwater into indoor air, causing a potential threat to human health. As requested by Ecology, the selected indoor air sample locations are the closest tenant space down-gradient from the Cleaning Center of Redmond with a perforation in the floor (floor drain), which potentially could allow concentrations of HVOCs to enter the building space.

Air Toxics, Ltd. of Folsom, California provided two Summa canisters to meet the quality assurance/quality control (QA/QC) standards for collection of the air samples. The Summa canisters were outfitted with flow regulators to collect air over an approximately 10-hour time-weighted period. Both indoor air samples were collected in the women's restroom located in the northwestern corner of the Staples store. One Summa canister was placed adjacent to the floor drain (IA-1) and the intake of the second Summa canister was placed in the breathing zone (IA-2) (Figure 4). The Summa canisters were collected at the end of the 10-hour sampling interval and shipped to Air Toxics, Ltd. for laboratory analysis for PCE and TCE using EPA Method TO15 SIM for low-level HVOCs. The potentially applicable screening levels for HVOCs in indoor air are described below.

The National Institute for Occupational Safety and Health (NIOSH) has established recommended exposure limits (REL) for compounds in the workplace, using a 10-hour workday during a 40-hour work week. With the exception of TCE, NIOSH does not provide RELs for known carcinogens, but bases exposure limits on risk evaluations and potential exposures, and recommends minimization of workplace exposure.



MTCA has not established a Method B standard formula value for PCE in air. The Occupational Safety and Health Administration (OSHA) has established permissible exposure limits (PELs), which are time-weighted averages that must not be exceeded during any 8-hour work shift of a 40-hour work week. The Washington State Department of Health (DOH) has established background concentrations of PCE and TCE for indoor air based on compilation of data from published sources, which also are considered in the evaluation of indoor air quality (DOH 2003). Farallon used the DOH background concentration of PCE for comparison with indoor air concentrations at the Site.



4.0 RESULTS

The results of the Site closure field activities and laboratory analyses are presented below. Soil sample analytical results are presented in Table 1 and illustrated on Figure 2. Groundwater elevations and analytical results are presented in Tables 2 and 3 and illustrated on Figure 3. Indoor air analytical results are presented in Table 4 and illustrated on Figure 4. Direct-push boring and monitoring well logs are provided in Appendix A. Soil and groundwater laboratory analytical results are provided in Appendix B.

4.1 SOIL

Soil encountered in the borings advanced during the investigations consisted of sand with varying quantities of gravel to the maximum depth explored of 25 feet bgs. No field indications of contamination were observed during drilling for the soil borings or the monitoring well boring, with the exception of high PID readings during installation of monitoring well MW-10. Based on field observation, the high PID readings observed during installation of monitoring well MW-10 are attributed to equipment error rather than the presence of volatile organic compounds.

QA/QC testing performed by OnSite Environmental Inc. included evaluation of surrogate recoveries, method blanks, and duplicates. Soil samples FB3-1, FB3-6, FB4-0.5, FB4-5, FB4-9, FB5-0.5, FB5-3, and FB5-5 detected methylene chloride ranging from 0.010 to 0.039 mg/kg with an “H” flag denoted on the laboratory analytical report. The “H” flag indicates that methylene chloride is a common laboratory solvent that may have been introduced during sample preparation, and may be impacting the sample result. The remaining QA/QC data associated with the confirmation soil samples were within acceptable QA/QC limits, and the data are acceptable for use in this report. The laboratory analytical reports are provided in Appendix B.

4.1.1 Former Redmond One Hour Cleaners

Concentrations of HVOCs in the soil samples analyzed from boring FB-1 at 1, 6, and 10 feet bgs, and from boring FB-2 at 1 foot bgs either were not detected above the laboratory practical quantitation limits (PQL) or were below MTCA Method A or B cleanup levels (Table 1; Figure 2).

4.1.2 Cleaning Center of Redmond

Concentrations of HVOCs in the soil samples analyzed from boring FB-3 at 1, 6, and 9 feet bgs, boring FB-4 and 0.5, 5, and 9 feet bgs, and boring FB-5 at 0.5, 3, and 5 feet bgs were either not detected above the laboratory PQL or were below MTCA Method A or B cleanup levels (Table 1; Figure 2).

4.1.3 Redmond Center

Concentrations of HVOCs in the soil sample analyzed from monitoring well boring MW-10 at 11 feet bgs were below the laboratory PQL (Table 1; Figure 2).



4.2 GROUNDWATER

The confirmation groundwater monitoring event was performed on May 15, 2007, and monitoring well MW-10 was sampled on June 20, 2007.

4.2.1 Confirmation Groundwater Monitoring Event

The groundwater elevations for the monitoring event ranged from 22.72 feet (MW-8) to 25.47 feet (EMW-1), relative to mean sea level (Table 2). Contouring of the groundwater levels indicated a groundwater flow direction predominantly toward the west-northwest, with an average gradient of 0.002 foot per foot. Previous monitoring events performed at the Site also have indicated a groundwater flow direction to the west-northwest.

The analytical results indicated that concentrations of PCE in groundwater samples collected from monitoring wells MW-1 through MW-3, MW-7, and MW-9 during the May 2007 monitoring event were below the MTCA Method A cleanup level of 5 µg/l for PCE in groundwater. Chloroform was detected at low concentrations (less than 0.51 µg/l) in the groundwater samples collected from monitoring wells MW-1, MW-2, MW-7, and MW-9. All other HVOCs were reported non-detect at the laboratory PQL, or were below applicable MTCA Method A or B cleanup levels. Figure 3 shows the PCE concentrations for groundwater samples collected from the monitoring wells on May 15, 2007. Table 3 summarizes the groundwater analytical results for selected HVOCs.

The QA/QC testing performed included an evaluation of surrogate recoveries, method blanks, and blank spike/blank spike duplicates. All laboratory QA/QC data were within acceptable ranges of tolerance, as indicated in the laboratory test certificates presented in Appendix B of this report. Farallon also submitted one field duplicate sample (MW3-FD-051507), which was collected concurrently with the primary sample from monitoring well MW-3. The calculated relative percent difference for PCE in the field duplicate sample was 8.3 percent, which is within the acceptable limit for relative percent difference. The QA/QC results indicate that the data are acceptable for use in this report. The laboratory analytical reports for the monitoring event are provided in Appendix B.

4.2.2 Groundwater Assessment

Analytical results for the groundwater sample collected from monitoring well MW-10 indicated a concentration of PCE of 7.4 µg/l, which slightly exceeds the MTCA Method A cleanup level of 5 µg/l (Figure 3; Table 3). A concentration of TCE below the MTCA Method A cleanup level was detected in the groundwater sample collected from monitoring well MW-10 (Table 3). All other HVOCs were reported non-detect at the laboratory PQL, or were below applicable MTCA Method A or B cleanup levels (Table 3).

The QA/QC testing included evaluation of surrogate recoveries, method blanks, and duplicates. The QA/QC data associated with the groundwater sample were within acceptable QA/QC limits, and the data are acceptable for use in this report. The laboratory analytical report is provided in Appendix B.



4.3 INDOOR AIR

The laboratory analytical results for the indoor air samples collected from the women's restroom in the Staples store indicated a PCE concentration of 1.4 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) in both samples (Table 4; Figure 4). Concentrations of TCE were reported as non-detect at the laboratory PQL in both indoor air samples (Table 4; Figure 4).

The analytical result for PCE in indoor air is expected to be the worst-case scenario inside the Staples store, because the sample was collected inside a closed room with the ventilation system turned off. According to the Staples store manager, the ventilation system is turned off approximately 30 minutes before the store closes (8:30 p.m.) and is turned back on approximately 30 minutes before the store opens (6:30 a.m.). The indoor air sample collection time was from approximately 9:15 p.m. to 7:15 a.m. The detected concentrations of PCE in indoor air are below the OSHA PEL for PCE of $678,000 \mu\text{g}/\text{m}^3$, and below the DOH background concentration for indoor air of $5 \mu\text{g}/\text{m}^3$ (Table 4). There are no established NIOSH or MTCA screening levels for PCE in indoor air.

The QA/QC testing included evaluation of surrogate recoveries, method blanks, and laboratory duplicates. The QA/QC data associated with the indoor air sample were within acceptable QA/QC limits, and the data are acceptable for use in this report. The laboratory analytical report is provided in Appendix B.



5.0 CONCLUSIONS

Farallon conducted various investigations during 2007 in accordance with the Work Plan, except as noted in Section 3 of this report. The investigations were conducted as an independent remedial action under the Voluntary Cleanup Program and in accordance with MTCA. Farallon's conclusions regarding the investigations conducted at the location of the former Redmond One Hour Cleaners and at the southeastern portion of the Redmond Center property, and the confirmation soil and groundwater sampling associated with the prior release of PCE at the Cleaning Center of Redmond facility are presented below.

5.1 FORMER REDMOND ONE HOUR CLEANERS

The results of the prior investigation by GeoEngineers, Inc. (2001) of soil conditions outside the existing building to the north of the location of the former Redmond One Hour Cleaners indicated that concentrations of PCE did not exceed the MTCA Method A cleanup level in effect at that time. The analytical results for HVOCs in groundwater samples collected at the monitoring wells nearest to (MW-5) and down-gradient of (MW-1 and MW-2) the location of the former Redmond One Hour Cleaners have been below the MTCA Method A cleanup levels for more than four consecutive quarters. In addition, concentrations of PCE in soil samples collected from borings FB-1 and FB-2 drilled at the direction of Farallon inside the QFC grocery store to assess soil conditions at the suspected location of the former Redmond One Hour Cleaners dry cleaning machine do not exceed the MTCA Method A cleanup level. These data collected by GeoEngineers, Inc. and Farallon confirm that soil and groundwater conditions do not represent a potential threat to human health or the environment at or down-gradient of the former Redmond One Hour Cleaners.

5.2 CLEANING CENTER OF REDMOND

A release of PCE in the vicinity of the dry cleaning machine at the Cleaning Center of Redmond impacted soil and groundwater. In response to the confirmed release, the use of PCE was discontinued at the Cleaning Center of Redmond in October 2002, and a cleanup action using SVE was performed for 3 years commencing in August 2003. Confirmation soil sampling was conducted by Farallon in June 2007, and four quarters of confirmation groundwater monitoring were completed in May 2007.

The confirmation soil sampling program included drilling three borings at the Cleaning Center of Redmond facility. Concentrations of PCE in soil samples collected at exterior boring FB-3 from depths of 1 to 9 feet bgs were below the MTCA Method A cleanup level. Boring FB-3 was located as close as possible to former monitoring well MW-4. GeoEngineers, Inc. had analyzed a soil sample collected from 22.5 feet bgs in monitoring well MW-4 that exceeded the previous MTCA Method A cleanup level of 0.5 mg/kg. Farallon did not collect a soil sample from 22.5 feet bgs in boring FB-3, because it would have been below the groundwater table and therefore not representative of concentrations in soil. Concentrations of PCE in soil samples collected from interior borings FB-4 and FB-5 from depths of 0.5 to 9 feet bgs, similar to the GeoEngineers, Inc. sample depths from borings B-10 and B-11, were below the MTCA



Method A cleanup level, indicating that the operation of the SVE system at the source area was successful in remediating previously contaminated soil in the vadose zone, and that no additional confirmation sampling is warranted.

Confirmation groundwater monitoring events were conducted at monitoring wells MW-1 through MW-3, MW-7, and MW-9 in August and November 2006, and in February and May 2007. The estimated direction of groundwater flow during this period was west-northwest, consistent with prior monitoring events at the Site. The analytical results for all of the confirmation groundwater samples were below the MTCA Method A cleanup levels for PCE and TCE.

Indoor air samples collected adjacent to the floor drain in the tenant space west-adjacent to the Cleaning Center of Redmond contained concentrations of PCE that were below the DOH background concentration for indoor air, and did not exceed the OSHA PEL. There is no established MTCA Method B cleanup level or NIOSH REL for PCE in air.

The results of the confirmation soil and groundwater sampling program at the Cleaning Center of Redmond facility and the assessment of indoor air at the adjacent tenant space indicate that the cleanup action remediated the release of PCE to soil and groundwater, and that conditions no longer represent a potential threat to human health or the environment.

5.3 SOUTHEASTERN PORTION OF REDMOND CENTER

The groundwater sample collected from monitoring well MW-10, located at the southeastern corner of the Redmond Center property, contained a concentration of PCE exceeding the MTCA Method A cleanup level, and was similar to the concentrations detected in the reconnaissance groundwater samples collected by Farallon from borings B-2 and B-3, which were located at the southeastern corner of the Redmond Center property. The analytical results indicate that a plume of PCE in groundwater emanating from an up-gradient, off-Site source(s) is present in the southern portion of the Redmond Center property. The location of the off-Site source(s) has not been identified.

Farallon conducted limited historical research to identify properties located up-gradient (east-southeast) of monitoring well MW-10 that may have used or stored PCE and may be the source responsible for the concentrations of PCE present in groundwater beneath this area of the Redmond Center property. The limited historical research included review of Sanborn Fire Insurance maps (up to 1926), Polk City Directories (R.L. Polk & Co.), and prior research conducted by Farallon for due diligence projects for properties located in downtown Redmond.

Properties identified from the limited historical research that may have used, stored, and possibly released PCE to groundwater include the following:

- Overlake Cleaners, located at 16940 Northeast 79th Street. A release of PCE exceeding MTCA Method A cleanup levels was confirmed at this property. Review of documents in Ecology files by Farallon indicated that a release of PCE at the Overlake Cleaners has contributed contamination detected in City of Redmond Wells #1 and #2;



- Redmond Cleaners, located at 7981 Leary Way Northeast. According to Ecology's database, this facility currently is listed as a small quantity generator of hazardous materials (PCE) related to dry cleaning operations;
- Spic-n-Span Cleaners, historically (1985) located at 16504 Redmond Way, Suite D; and Daniels Cleaners, currently located at 16450 Redmond Way. Farallon has no additional information on these properties;
- Foto Fast, historically (1980) located at 15958 Redmond Way. This was a film sales and processing facility that appears to have been directly across 160th Avenue Northeast from the Site, possibly at the location of the current Jamba Juice; and
- Former King County Maintenance Facility, located at 7733 Leary Way Northeast. Concentrations of PCE in groundwater exceeding the MTCA Method A cleanup level were confirmed at this facility that currently is owned by the City of Redmond. This facility may be cross-gradient to monitoring well MW-10 based on the estimated property-specific groundwater flow direction.

In addition to the above properties, numerous automotive repair facilities historically were or currently are located up-gradient of monitoring well MW-10. It is possible that one or more of these facilities used PCE as a degreasing solvent, although use of PCE was not historically widespread at automotive repair facilities based on Farallon's experience in conducting site assessments and cleanup actions at these types of facilities.

5.4 SUMMARY

Farallon has completed the Site closure activities described in the Work Plan. Soil and groundwater data collected at and down-gradient of the former Redmond One Hour Cleaners facility did not identify a release of PCE exceeding MTCA Method A cleanup levels. No further action is warranted to assess this former facility. In addition, the cleanup action completed at the Cleaning Center of Redmond was successful in remediating the release of PCE to soil and groundwater, and conditions no longer represent a threat to human health or the environment. No further actions are warranted or planned at the Site.

The analytical results for a groundwater sample collected at monitoring well MW-10 indicates that groundwater at the southeastern corner of the Redmond Center property has concentrations of PCE that slightly exceed the MTCA Method A cleanup level. This monitoring well is not located in an area that could have been impacted by the release of PCE at the Cleaning Center of Redmond. The presence of PCE in groundwater at this location is attributed to a release from an off-Site source(s). The specific location of the off-Site source(s) has not been confirmed, although the limited historical research conducted by Farallon identified several facilities located proximate to or up-gradient of monitoring well MW-10 that potentially may be the source of groundwater contamination impacting the Redmond Center property. Farallon recommends that Ecology and/or the City of Redmond obtain sufficient information regarding subsurface conditions at these facilities to assess whether a release of PCE to groundwater may have occurred.



6.0 REFERENCES

- Alisto Engineering Group. 1999. *Environmental Soil and Groundwater Sampling, Cleaning Center of Redmond, Redmond, Washington*. March 18.
- Farallon Consulting, L.L.C. (Farallon). 2005. *Limited Subsurface Investigation Report, The Cleaning Center of Redmond, 15796 Redmond Way, Redmond, Washington*. January 18.
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<<http://www.metrokc.gov/assessor/eRealProperty/disclaimer.asp>>. (January 2005.)
- Polk , R.L. & Co. Reverse-Index City Directories for Bellevue, Kirkland, and Redmond for the years 1979, 1980, and 1985, reviewed at the Bellevue Public Library, in Bellevue, Washington.
- U.S. Geological Survey. 1982. Topographic Map, *Bellevue North, Washington, 7.5-Minute Series*.
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Washington State Department of Health (DOH). 2003. *Health Consultation: Indoor Air Quality Evaluation, Cadet Manufacturing Company Site, Vancouver, Clark County, Washington*. May.



7.0 LIMITATION

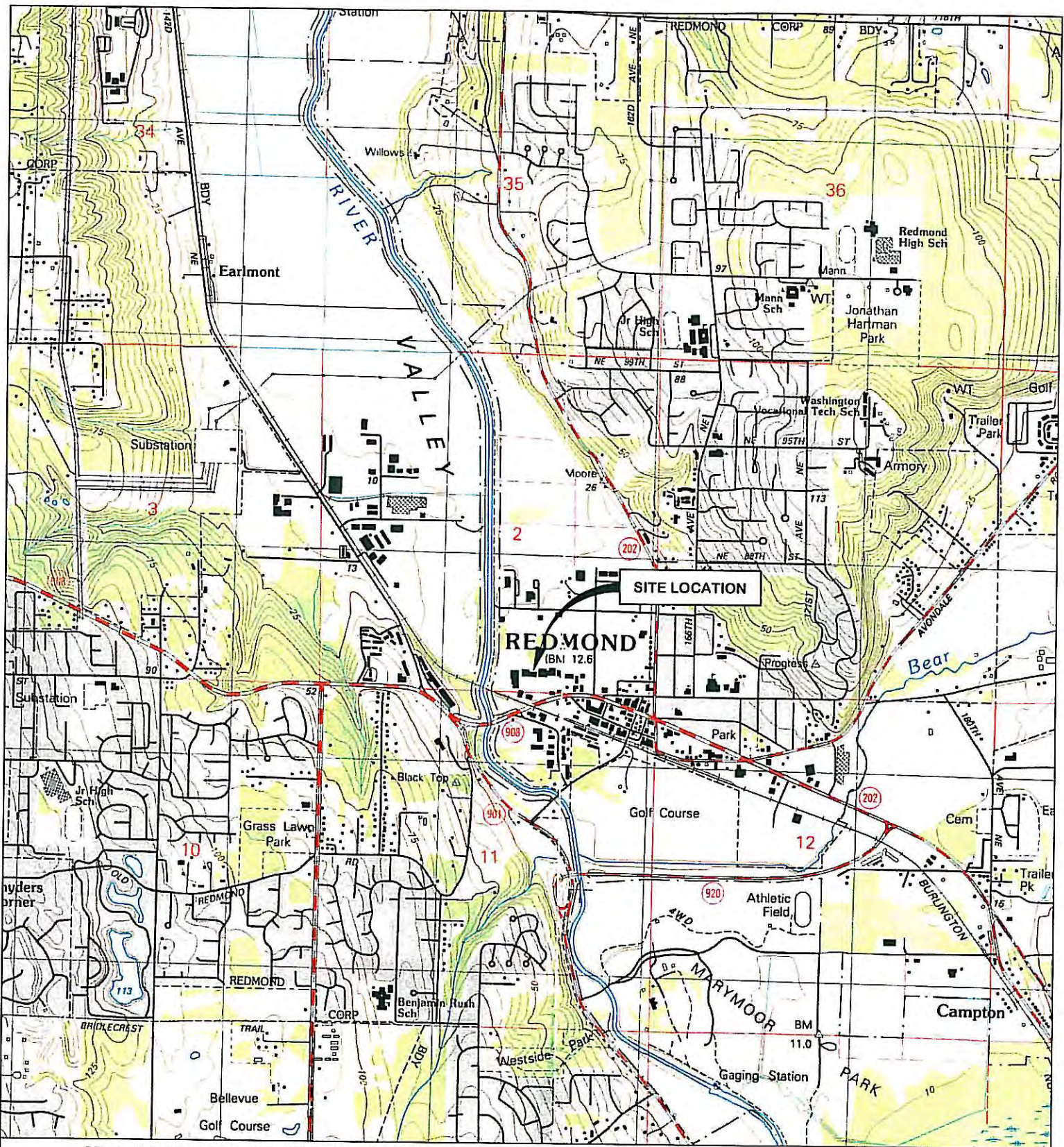
The conclusions and recommendations contained in this report are based on professional opinions with regard to the subject matter. These opinions have been arrived at in accordance with currently accepted hydrogeologic and engineering standards and practices applicable to this location, and are subject to the following limitation.

Certain information used by Farallon in this report has been obtained, reviewed, and/or evaluated from various sources believed to be reliable. Although Farallon's conclusions, opinions, and recommendations are based in part on such information, Farallon's services did not include verification of its accuracy or authenticity. Should such information prove to be inaccurate or unreliable, Farallon reserves the right to amend or revise its conclusions, opinions, and/or recommendations.

FIGURES

SITE CLOSURE REPORT
Cleaning Center of Redmond
15796 Redmond Way
Redmond, Washington

Farallon PN: 650-001



REFERENCE: 7.5 MINUTE USGS QUADRANGLE BELLEVUE NORTH, WASHINGTON. DATED 1982



WASHINGTON

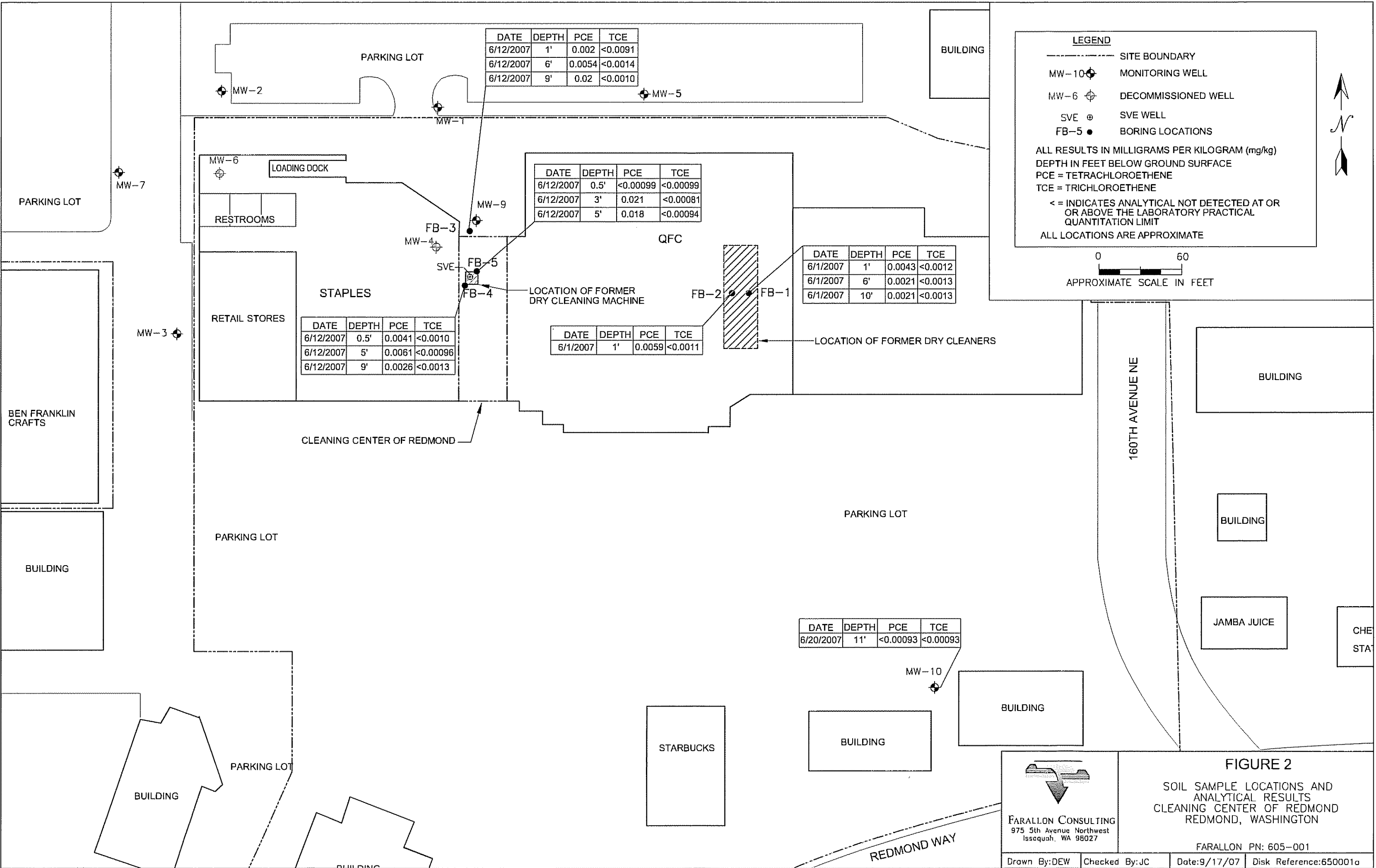


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 Issaquah, WA 98027

FIGURE 1
 SITE LOCATION MAP
 CLEANING CENTER OF REDMOND
 REDMOND, WASHINGTON

FARALLON PN: 650-001

Drawn By: DEW	Checked By: TH	Date: 9/17/07	Disk Reference: 650001a
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DATE	DEPTH	PCE	TCE
6/12/2007	1'	0.002	<0.0091
6/12/2007	6'	0.0054	<0.0014
6/12/2007	9'	0.02	<0.0010

DATE	DEPTH	PCE	TCE
6/12/2007	0.5'	<0.00099	<0.00099
6/12/2007	3'	0.021	<0.00081
6/12/2007	5'	0.018	<0.00094

DATE	DEPTH	PCE	TCE
6/1/2007	1'	0.0043	<0.0012
6/1/2007	6'	0.0021	<0.0013
6/1/2007	10'	0.0021	<0.0013

DATE	DEPTH	PCE	TCE
6/12/2007	0.5'	0.0041	<0.0010
6/12/2007	5'	0.0061	<0.00096
6/12/2007	9'	0.0026	<0.0013

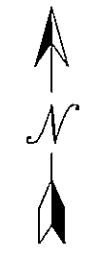
DATE	DEPTH	PCE	TCE
6/1/2007	1'	0.0059	<0.0011

DATE	DEPTH	PCE	TCE
6/20/2007	11'	<0.00093	<0.00093

LEGEND

- SITE BOUNDARY
- MW-10 MONITORING WELL
- MW-6 DECOMMISSIONED WELL
- SVE SVE WELL
- FB-5 BORING LOCATIONS

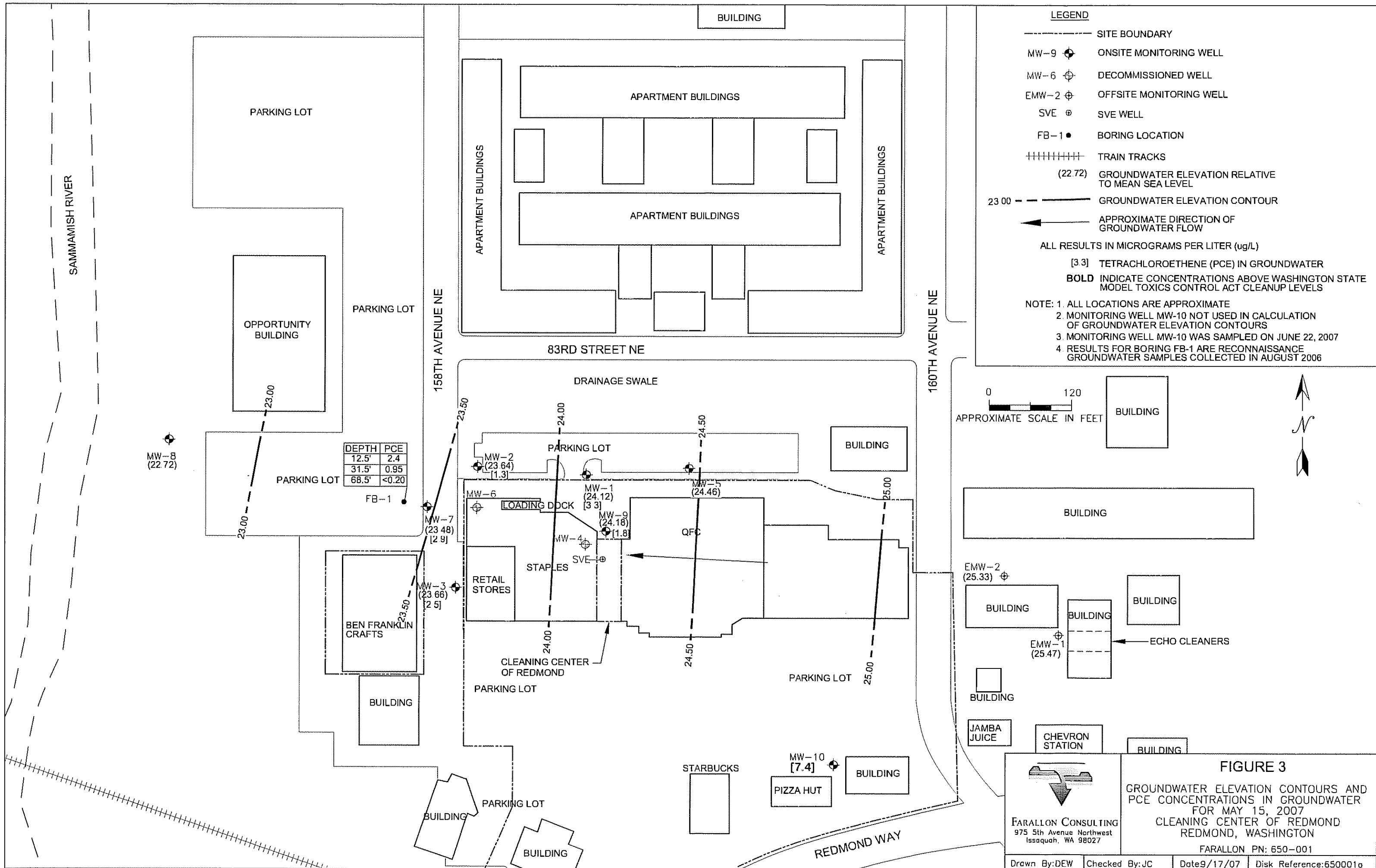
ALL RESULTS IN MILLIGRAMS PER KILOGRAM (mg/kg)
 DEPTH IN FEET BELOW GROUND SURFACE
 PCE = TETRACHLOROETHENE
 TCE = TRICHLOROETHENE
 < = INDICATES ANALYTICAL NOT DETECTED AT OR
 OR ABOVE THE LABORATORY PRACTICAL
 QUANTITATION LIMIT
 ALL LOCATIONS ARE APPROXIMATE



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FIGURE 2
 SOIL SAMPLE LOCATIONS AND
 ANALYTICAL RESULTS
 CLEANING CENTER OF REDMOND
 REDMOND, WASHINGTON

FARALLON PN: 605-001



LEGEND

- SITE BOUNDARY
 - MW-9 ONSITE MONITORING WELL
 - MW-6 DECOMMISSIONED WELL
 - EMW-2 OFFSITE MONITORING WELL
 - SVE SVE WELL
 - FB-1 BORING LOCATION
 - +++++ TRAIN TRACKS
 - (22.72) GROUNDWATER ELEVATION RELATIVE TO MEAN SEA LEVEL
 - 23.00 - - - - GROUNDWATER ELEVATION CONTOUR
 - APPROXIMATE DIRECTION OF GROUNDWATER FLOW
- ALL RESULTS IN MICROGRAMS PER LITER (ug/L)
- [3.3] TETRACHLOROETHENE (PCE) IN GROUNDWATER
- BOLD** INDICATE CONCENTRATIONS ABOVE WASHINGTON STATE MODEL TOXICS CONTROL ACT CLEANUP LEVELS

- NOTE: 1. ALL LOCATIONS ARE APPROXIMATE
 2. MONITORING WELL MW-10 NOT USED IN CALCULATION OF GROUNDWATER ELEVATION CONTOURS
 3. MONITORING WELL MW-10 WAS SAMPLED ON JUNE 22, 2007
 4. RESULTS FOR BORING FB-1 ARE RECONNAISSANCE GROUNDWATER SAMPLES COLLECTED IN AUGUST 2006

DEPTH	PCE
12.5'	2.4
31.5'	0.95
68.5'	<0.20

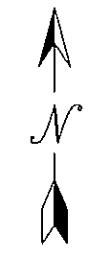
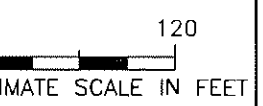
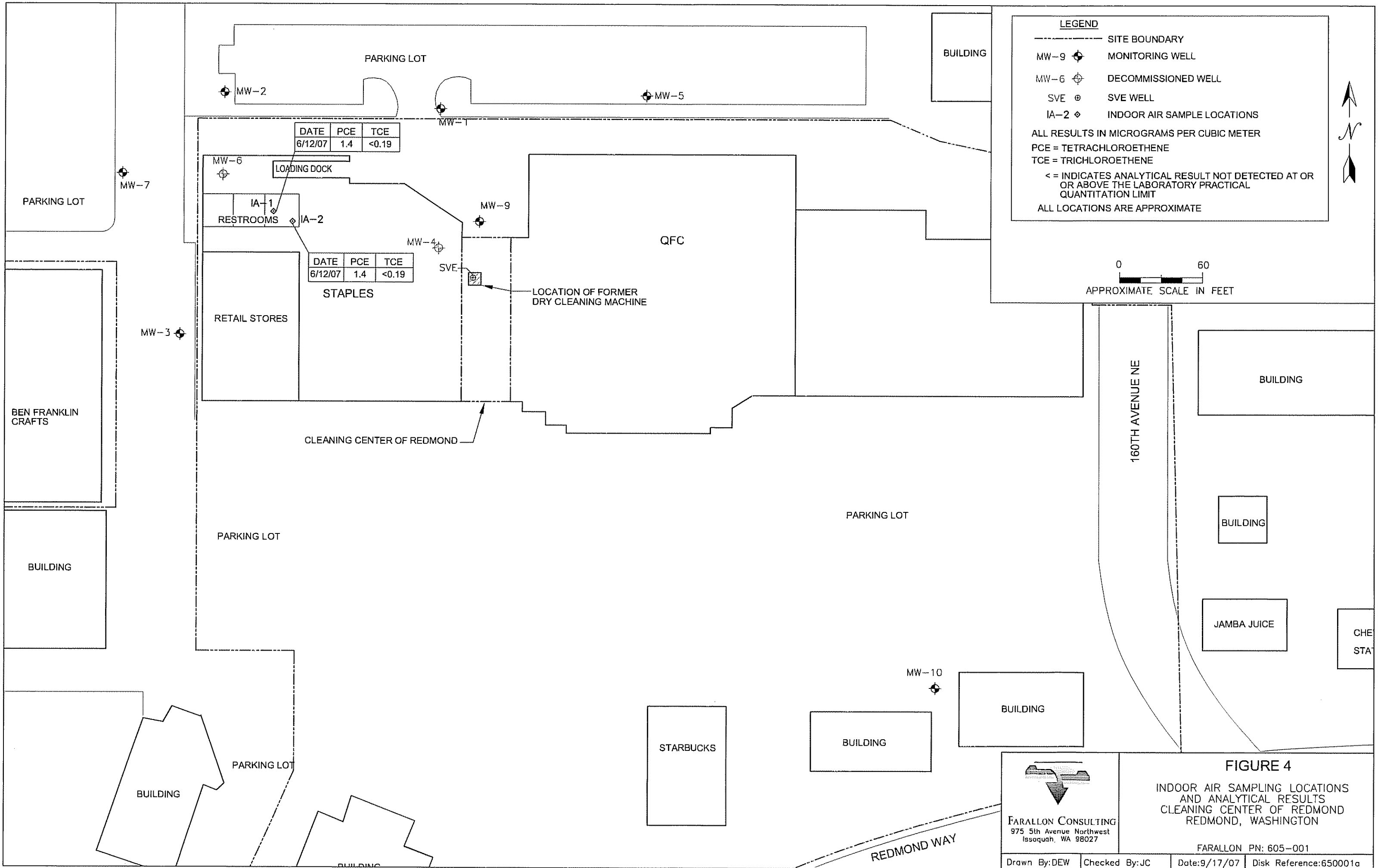


FIGURE 3

GROUNDWATER ELEVATION CONTOURS AND PCE CONCENTRATIONS IN GROUNDWATER FOR MAY 15, 2007
 CLEANING CENTER OF REDMOND
 REDMOND, WASHINGTON

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 Issaquah, WA 98027



DATE	PCE	TCE
6/12/07	1.4	<0.19

DATE	PCE	TCE
6/12/07	1.4	<0.19

LEGEND

- SITE BOUNDARY
- MW-9 MONITORING WELL
- MW-6 DECOMMISSIONED WELL
- SVE SVE WELL
- IA-2 INDOOR AIR SAMPLE LOCATIONS

ALL RESULTS IN MICROGRAMS PER CUBIC METER
PCE = TETRACHLOROETHENE
TCE = TRICHLOROETHENE
< = INDICATES ANALYTICAL RESULT NOT DETECTED AT OR OR ABOVE THE LABORATORY PRACTICAL QUANTITATION LIMIT
ALL LOCATIONS ARE APPROXIMATE



FIGURE 4

INDOOR AIR SAMPLING LOCATIONS AND ANALYTICAL RESULTS
CLEANING CENTER OF REDMOND
REDMOND, WASHINGTON

FARALLON CONSULTING
975 5th Avenue Northwest
Issaquah, WA 98027

FARALLON PN: 605-001

TABLES

SITE CLOSURE REPORT
Cleaning Center of Redmond
15796 Redmond Way
Redmond, Washington

Farallon PN: 650-001

Table 1
Summary of Soil Sample Analytical Results - HVOCs
Cleaning Center of Redmond
Redmond, Washington
Farallon PN: 650-001

Boring ID	Sample Number	Date Sampled	Sample Depth (feet) ¹	Analytical Results (milligrams per kilogram)			
				PCE ²	TCE ²	cis-1,2-Dichloroethene ²	trans-1,2-Dichloroethene ²
FB1	FB1-1	6/1/2007	1	0.0043	<0.0012	<0.0012	<0.0012
	FB1-6	6/1/2007	6	0.0021	<0.0013	<0.0013	<0.0013
	FB1-10	6/1/2007	10	0.0021	<0.0013	<0.0013	<0.0013
FB2	FB2-1	6/1/2007	1	0.0059	<0.0011	<0.0011	<0.0011
FB3	FB3-1	6/12/2007	1	0.002	<0.00091	<0.00091	<0.00091
	FB3-6	6/12/2007	6	0.0054	<0.0014	0.043	0.0028
	FB3-9	6/12/2007	9	0.02	<0.0010	0.0017	<0.0010
FB4	FB4-0.5	6/12/2007	0.5	0.0041	<0.0010	<0.0010	<0.0010
	FB4-5	6/12/2007	5	0.0061	<0.00096	<0.00096	<0.00096
	FB4-9	6/12/2007	9	0.0026	<0.0013	<0.0013	<0.0013
FB5	FB5-0.5	6/12/2007	0.5	<0.00099	<0.00099	<0.00099	<0.00099
	FB5-3	6/12/2007	3	0.021	<0.00081	<0.00081	<0.00081
	FB5-5	6/12/2007	5	0.018	<0.00094	<0.00094	<0.00094
MW10	MW10-11	6/20/2007	11	<0.00093	<0.00093	<0.00093	<0.00093
MICA Cleanup Levels for Soil				0.05³	0.03³	800⁴	1,600⁴

NOTES:

< denotes concentration is less than the laboratory practical quantitation limit indicated.

¹Depth in feet below ground surface.

²Analyzed by U.S. Environmental Protection Agency Method 8260B

³Washington State Department of Ecology Model Toxics Control Act (MTCA) Cleanup Regulation Method A Soil Cleanup Level. Chapter 173-340 of the Washington Administrative Code, as amended February 2001

⁴MTCA Cleanup Levels and Risk Calculations (CLARC) Standard Method B Formula Values, Version 3.1, updated November 2001

PCE = tetrachloroethene

TCE = trichloroethene

HVOCs = halogenated volatile organic compounds

Table 2
Summary of Groundwater Elevations
Cleaning Center of Redmond
Redmond, Washington
Farallon PN:650-001

Well Identification	Date	Top of Well Casing Elevation (feet)	Depth to Water (feet) ²	Groundwater Elevation (feet) ¹
MW-1	12/20/2000	100.08 ¹	11.1	88.98
	6/6/2001		10.47	89.61
	6/28/2002		11.51	88.57
	8/13/2003		12.33	87.75
	11/12/2003		10.58	89.5
	2/18/2004		8.71	91.37
	5/10/2004		11.43	88.65
	8/27/2004		11.26	88.82
	2/15/2006	34.95 ³	8.37	26.58
	8/23/2006		12.73	22.22
	11/21/2006		6.71	28.24
	2/28/2007		9.81	25.14
	5/15/2007		10.83	24.12
MW-2	12/20/2000	100.76 ¹	12.07	88.69
	6/6/2001		11.43	89.33
	6/28/2002		12.58	88.18
	8/13/2003		13.27	87.49
	11/12/2003		11.65	89.11
	2/18/2004		9.95	90.81
	5/10/2004		12.47	88.29
	8/27/2004		12.11	88.65
	2/15/2006	35.63 ³	9.60	26.03
	8/23/2006		12.72	22.91
	11/21/2006		7.49	28.14
	2/28/2007		10.91	24.72
	5/15/2007		11.99	23.64
MW-3	12/20/2000	98.41 ¹	9.7	88.71
	6/6/2001		9.08	89.33
	6/28/2002		10.22	88.19
	8/13/2003		10.88	87.53
	11/12/2003		9.31	89.1
	2/18/2004		7.59	90.82
	5/10/2004		10.1	88.31
	8/27/2004		9.73	88.68
	2/15/2006	33.28 ³	7.25	26.03
	8/23/2006		10.37	22.91
	11/21/2006		5.11	28.17
	2/28/2007		8.51	24.77
	5/15/2007		9.62	23.66
MW-4	12/20/2000	98.82 ¹	9.71	89.11
	6/6/2001		9.18	89.64
	6/28/2002		10.26	88.56
	8/13/2003		Well Removed	—
MW-5	12/20/2000	101.32 ¹	11.97	89.53
	6/6/2001		11.47	89.85
	6/28/2002		12.52	88.8
	8/13/2003		13.41	87.91
	11/12/2003		11.47	89.85
	2/18/2004		9.46	91.86
	5/10/2004		12.41	88.91
	8/27/2004		12.41	98.91
	2/15/2006	36.19 ³	9.18	27.01
	8/23/2006		12.73	23.46
	11/21/2006		7.92	28.27
	2/28/2007		10.75	25.44
	5/15/2007		11.73	24.46

Table 2
Summary of Groundwater Elevations
Cleaning Center of Redmond
Redmond, Washington
Farallon PN:650-001

MW-6	12/20/2000	98 52 ¹	9.81	88.71
	6/6/2001		9.19	89.33
	6/28/2002		10.33	88.19
	8/13/2003		Well Removed	—
MW-7	12/20/2000	98 29 ¹	9.7	88.59
	6/6/2001		9.02	89.27
	6/28/2002		10.21	88.08
	8/13/2003		10.85	87.44
	11/12/2003		9.32	88.97
	2/18/2004		7.68	90.61
	5/10/2004	10.07	88.22	
	8/30/2004	9.72	88.57	
	2/15/2006	7.31	25.85	
	8/23/2006	10.35	22.81	
	11/21/2006	5.02	28.14	
	2/28/2007	8.54	24.62	
	5/15/2007	9.68	23.48	
MW-8	12/20/2000	99 11 ¹	11.12	87.99
	6/6/2001		10.34	88.77
	6/28/2002		11.61	87.5
	8/13/2003		12.1	87.01
	11/12/2003		10.82	88.29
	2/18/2004		9.42	89.69
	5/10/2004		11.51	87.60
	8/27/2004		10.79	88.32
	2/15/2006	9.02	24.96	
	8/23/2006	11.69	22.29	
	11/21/2006	5.98	28.00	
	2/28/2007	10.06	23.92	
	5/15/2007	11.26	22.72	
MW-9 ⁴	8/13/2003	99 13 ¹	11.38	87.75
	11/12/2003		9.6	89.53
	2/18/2004		7.72	91.41
	5/10/2004		10.46	88.67
	8/27/2004		10.28	88.85
	2/15/2006	7.36	26.64	
	8/23/2006	10.72	23.28	
	11/21/2006	5.72	28.28	
	2/28/2007	8.79	25.21	
5/15/2007	9.82	24.18		
MW-10	6/22/2007	38.29	13.84	24.45
EMW-1	2/15/2006	38 59 ³	10.51	28.08
	8/23/2006		14.42	24.17
	11/21/2006		10.00	28.59
	2/28/2007		12.20	26.39
	5/15/2007		13.12	25.47
EMW-2	2/15/2006	38.63 ³	10.68	27.95
	8/23/2006		14.56	24.07
	11/21/2006		10.11	28.52
	2/28/2007		12.38	26.25
	5/15/2007		13.3	25.33

NOTES:

— = not applicable

¹Relative to an on-site datum of 100 feet

²In feet below top of casing.

³In feet above mean sea level

⁴Well installed on November 19, 2002

Table 3
Summary of Groundwater Sample Analytical Results - HVOCs
Cleaning Center of Redmond
Redmond, Washington
Farallon PN: 650-001

Well Identification	Date Sampled	Sample Collected By	Analytical Results (micrograms per liter) ¹			
			Tetrachloroethene	Trichloroethene	cis-1,2-Dichloroethene	Vinyl Chloride
MW-1	3/6/2000	GeoEngineers	1.6	<1.0	<5.0	<5.0
	8/8/2000	GeoEngineers	5.4	<1.0	<5.0	<5.0
	12/20/2000	Farallon	2.7	<0.20	<0.20	<0.20
	6/6/2001	Farallon	1.3	<0.20	<0.20	<0.20
	6/28/2002	Farallon	2.1	<0.20	<0.20	<0.20
	8/13/2003	Farallon	1.2	<0.20	<0.20	<0.20
	11/12/2003	Farallon	3.3	0.22	<0.20	<0.20
	2/18/2004	Farallon	2.9	<0.20	<0.20	<0.20
	5/10/2004	Farallon	4.0	<0.20	<0.20	<0.20
	8/27/2004	Farallon	8.5	0.84	1.2	0.76
	2/15/2006	Farallon	2.4	<0.20	<0.20	<0.20
	8/23/2006	Farallon	3.3	<0.20	<0.20	<0.20
	11/21/2006	Farallon	4.5	0.26	<0.20	<0.20
	2/28/2007	Farallon	2.3	<0.20	<0.20	<0.20
	5/15/2007	Farallon	3.3	<0.20	<0.20	<0.20
MW-2	3/6/2000	GeoEngineers	<1.0	<1.0	<5.0	<5.0
	8/8/2000	GeoEngineers	2.9	<1.0	<5.0	<5.0
	12/20/2000	Farallon	2.9	<0.20	<0.20	<0.20
	6/6/2001	Farallon	1.9	<0.20	<0.20	<0.20
	6/28/2002	Farallon	0.81	<0.20	<0.20	<0.20
	8/13/2003	Farallon	0.99	<0.20	<0.20	<0.20
	11/12/2003	Farallon	0.66	<0.20	<0.20	<0.20
	2/18/2004	Farallon	0.88	<0.20	<0.20	<0.20
	5/10/2004	Farallon	0.54	<0.20	<0.20	<0.20
	8/27/2004	Farallon	0.56	<0.20	<0.20	<0.20
	2/15/2006	Farallon	1.1	<0.20	<0.20	<0.20
	8/23/2006	Farallon	1.0	<0.20	<0.20	<0.20
	11/21/2006	Farallon	1.1	<0.20	<0.20	<0.20
	2/28/2007	Farallon	0.83	<0.20	<0.20	<0.20
	5/15/2007	Farallon	1.30	<0.20	<0.20	<0.20
MW-3	3/6/2000	GeoEngineers	<1.0	<1.0	<5.0	<5.0
	8/8/2000	GeoEngineers	<1.0	<1.0	<5.0	<5.0
	12/20/2000	Farallon	0.34	<0.20	<0.20	<0.20
	6/6/2001	Farallon	2.0	<0.20	<0.20	<0.20
	6/28/2002	Farallon	2.0	<0.20	<0.20	<0.20
	8/13/2003	Farallon	7.3	<0.20	0.49	<0.20
	11/12/2003	Farallon	4.5	0.21	<0.20	<0.20
	2/18/2004	Farallon	2.8	<0.20	<0.20	<0.20
	5/10/2004	Farallon	3.5	<0.20	<0.20	<0.20
	8/27/2004	Farallon	6.7	0.45	0.24	<0.20
	2/15/2006	Farallon	2.1	<0.20	<0.20	<0.20
	8/23/2006	Farallon	2.5	<0.20	<0.20	<0.20
	11/21/2006	Farallon	5.0	0.21	<0.20	<0.20
	2/28/2007	Farallon	1.8	<0.20	<0.20	<0.20
	5/15/2007	Farallon	2.5	<0.20	<0.20	<0.20
MTCA Cleanup Levels for Groundwater			5.0²	5.0²	80³	0.2²

Table 3
Summary of Groundwater Sample Analytical Results - HVOCs
Cleaning Center of Redmond
Redmond, Washington
Farallon PN: 650-001

Well Identification	Date Sampled	Sample Collected By	Analytical Results (micrograms per liter) ¹			
			Tetrachloroethene	Trichloroethene	cis-1,2-Dichloroethene	Vinyl Chloride
MW-1	3/6/2000	GeoEngineers	1.6	<1.0	<5.0	<5.0
	8/8/2000	GeoEngineers	5.4	<1.0	<5.0	<5.0
	12/20/2000	Farallon	2.7	<0.20	<0.20	<0.20
	6/6/2001	Farallon	1.3	<0.20	<0.20	<0.20
	6/28/2002	Farallon	2.1	<0.20	<0.20	<0.20
	8/13/2003	Farallon	1.2	<0.20	<0.20	<0.20
	11/12/2003	Farallon	3.3	0.22	<0.20	<0.20
	2/18/2004	Farallon	2.9	<0.20	<0.20	<0.20
	5/10/2004	Farallon	4.0	<0.20	<0.20	<0.20
	8/27/2004	Farallon	8.5	0.84	1.2	0.76
	2/15/2006	Farallon	2.4	<0.20	<0.20	<0.20
	8/23/2006	Farallon	3.3	<0.20	<0.20	<0.20
	11/21/2006	Farallon	4.5	0.26	<0.20	<0.20
	2/28/2007	Farallon	2.3	<0.20	<0.20	<0.20
	5/15/2007	Farallon	3.3	<0.20	<0.20	<0.20
MW-2	3/6/2000	GeoEngineers	<1.0	<1.0	<5.0	<5.0
	8/8/2000	GeoEngineers	2.9	<1.0	<5.0	<5.0
	12/20/2000	Farallon	2.9	<0.20	<0.20	<0.20
	6/6/2001	Farallon	1.9	<0.20	<0.20	<0.20
	6/28/2002	Farallon	0.81	<0.20	<0.20	<0.20
	8/13/2003	Farallon	0.99	<0.20	<0.20	<0.20
	11/12/2003	Farallon	0.66	<0.20	<0.20	<0.20
	2/18/2004	Farallon	0.88	<0.20	<0.20	<0.20
	5/10/2004	Farallon	0.54	<0.20	<0.20	<0.20
	8/27/2004	Farallon	0.56	<0.20	<0.20	<0.20
	2/15/2006	Farallon	1.1	<0.20	<0.20	<0.20
	8/23/2006	Farallon	1.0	<0.20	<0.20	<0.20
	11/21/2006	Farallon	1.1	<0.20	<0.20	<0.20
	2/28/2007	Farallon	0.83	<0.20	<0.20	<0.20
	5/15/2007	Farallon	1.30	<0.20	<0.20	<0.20
MW-3	3/6/2000	GeoEngineers	<1.0	<1.0	<5.0	<5.0
	8/8/2000	GeoEngineers	<1.0	<1.0	<5.0	<5.0
	12/20/2000	Farallon	0.34	<0.20	<0.20	<0.20
	6/6/2001	Farallon	2.0	<0.20	<0.20	<0.20
	6/28/2002	Farallon	2.0	<0.20	<0.20	<0.20
	8/13/2003	Farallon	7.3	<0.20	0.49	<0.20
	11/12/2003	Farallon	4.5	0.21	<0.20	<0.20
	2/18/2004	Farallon	2.8	<0.20	<0.20	<0.20
	5/10/2004	Farallon	3.5	<0.20	<0.20	<0.20
	8/27/2004	Farallon	6.7	0.45	0.24	<0.20
	2/15/2006	Farallon	2.1	<0.20	<0.20	<0.20
	8/23/2006	Farallon	2.5	<0.20	<0.20	<0.20
	11/21/2006	Farallon	5.0	0.21	<0.20	<0.20
	2/28/2007	Farallon	1.8	<0.20	<0.20	<0.20
	5/15/2007	Farallon	2.5	<0.20	<0.20	<0.20
MTCA Cleanup Levels for Groundwater			5.0²	5.0²	80³	0.2²

Table 3
Summary of Groundwater Sample Analytical Results - HVOCs
Cleaning Center of Redmond
Redmond, Washington
Farallon PN: 650-001

Well Identification	Date Sampled	Sample Collected By	Analytical Results (micrograms per liter) ¹			
			Tetrachloroethene	Trichloroethene	Dichloroethene cis-1,2-	Vinyl Chloride
MW-4	3/6/2000	GeoEngineers	50	<1.0	<5.0	<5.0
	8/8/2000	GeoEngineers	9.2	<1.0	<5.0	<5.0
	12/20/2000	Farallon	28	0.43	0.78	<0.20
	6/6/2001	Farallon	16	0.32	0.80	<0.20
	6/28/2002	Farallon	14	0.5	1.50	<0.20
	Well Removed 2003					
MW-5	3/6/2000	GeoEngineers	<1.0	<1.0	<5.0	<5.0
	8/8/2000	GeoEngineers	<1.0	<1.0	<5.0	<5.0
	12/20/2000	Farallon	2.0	<0.20	<0.20	<0.20
	6/6/2001	Farallon	1.7	<0.20	<0.20	<0.20
	6/28/2002	Farallon	1.6	<0.20	<0.20	<0.20
	8/13/2003	Farallon	0.2	<0.20	<0.20	<0.20
	11/12/2003	Farallon	3.6	<0.20	<0.20	<0.20
	2/18/2004	Farallon	4.8	<0.20	<0.20	<0.20
	5/10/2004	Farallon	1.6	<0.20	<0.20	<0.20
	8/27/2004	Farallon	1.4	<0.20	<0.20	<0.20
	2/15/2006	Farallon	4.8	<0.20	<0.20	<0.20
8/23/2006	Farallon	1.0	<0.20	<0.20	<0.20	
MW-6	3/6/2000	GeoEngineers	11	<1.0	<5.0	<5.0
	8/8/2000	GeoEngineers	27	<1.0	<5.0	<5.0
	12/20/2000	Farallon	15	0.24	<0.20	<0.20
	6/6/2001	Farallon	8.6	<0.20	<0.20	<0.20
	6/28/2002	Farallon	6.3	<0.20	0.29	<0.20
	Well Removed 2003					
MW-7	3/28/2000	GeoEngineers	15	3	<5.0	<5.0
	8/8/2000	GeoEngineers	14	<1.0	<5.0	<5.0
	12/21/2000	Farallon	12	<0.20	<0.20	<0.20
	6/6/2001	Farallon	7.6	<0.20	<0.20	<0.20
	6/28/2002	Farallon	3.9	<0.20	<0.20	<0.20
	8/13/2003	Farallon	5.3	<0.20	<0.20	<0.20
	11/12/2003	Farallon	4.5	<0.20	<0.20	<0.20
	2/18/2004	Farallon	3.6	<0.20	<0.20	<0.20
	5/10/2004	Farallon	3.3	<0.20	<0.20	<0.20
	8/30/2004	Farallon	3.6	<0.20	<0.20	<0.20
	2/15/2006	Farallon	2.5	<0.20	<0.20	<0.20
	8/23/2006	Farallon	2.3	<0.20	<0.20	<0.20
	11/21/2006	Farallon	2.2	<0.20	<0.20	<0.20
	2/28/2007	Farallon	2.1	<0.20	<0.20	<0.20
5/15/2007	Farallon	2.9	<0.20	<0.20	<0.20	
MTCA Cleanup Levels for Groundwater			5.0²	5.0²	80¹	0.2¹

Table 3
Summary of Groundwater Sample Analytical Results - HVOCs
Cleaning Center of Redmond
Redmond, Washington
Farallon PN: 650-001

Well Identification	Date Sampled	Sample Collected By	Analytical Results (micrograms per liter) ¹			
			Tetrachloroethene	Trichloroethene	cis-1,2-Dichloroethene	Vinyl Chloride
MW-8	4/14/2000	GeoEngineers	7.4	<1.0	<5.0	<5.0
	8/8/2000	GeoEngineers	8.5	<1.0	<5.0	<5.0
	12/20/2000	Farallon	5.7	0.33	0.48	<0.20
	6/6/2001	Farallon	3.9	0.23	0.36	<0.20
	6/28/2002	Farallon	4.1	0.29	0.46	<0.20
	8/13/2003	Farallon	3.4	0.26	0.46	<0.20
	11/12/2003	Farallon	0.62	<0.20	<0.20	<0.20
	2/18/2004	Farallon	0.3	<0.20	<0.20	<0.20
	5/10/2004	Farallon	2.8	0.25	0.37	<0.20
MW-9	8/27/2004	Farallon	0.43	<0.20	<0.20	<0.20
	8/13/2003	Farallon	7.4	0.27	0.42	<0.20
	11/12/2003	Farallon	3.7	<0.20	<0.20	<0.20
	2/18/2004	Farallon	2.9	<0.20	<0.20	<0.20
	5/10/2004	Farallon	2.5	<0.20	<0.20	<0.20
	8/27/2004	Farallon	3.0	<0.20	<0.20	<0.20
	2/15/2006	Farallon	2.5	<0.20	<0.20	<0.20
	8/23/2006	Farallon	1.6	<0.20	<0.20	<0.20
	11/21/2006	Farallon	2.1	<0.20	<0.20	<0.20
MW-10	2/28/2007	Farallon	2.4	<0.20	<0.20	<0.20
	5/15/2007	Farallon	1.8	<0.20	<0.20	<0.20
	6/22/2007	Farallon	7.4	0.48	<0.20	<0.20
Field Duplicate Samples						
MW1-FD-112106	11/21/2006	Farallon	4.6	0.24	<0.20	<0.20
MW2-FD-022807	2/28/2006	Farallon	0.86	<0.20	<0.20	<0.20
MW3-FD-051507	5/15/2007	Farallon	2.30	<0.20	<0.20	<0.20
MTCA Cleanup Levels for Groundwater			5.0²	5.0²	80³	0.2²

NOTES:

Results in **BOLD** indicate concentrations above Washington State Model Toxics Control Act Cleanup Regulation (MTCA) Method A cleanup levels.

< indicates analyte not detected at or above the laboratory practical quantitation limit shown.

¹ Analyzed by U.S. Environmental Protection Agency Method 8260B.

² MTCA Chapter 173-340 of the Washington Administrative Code Method A cleanup levels for groundwater.

³ Cleanup Levels and Risk Calculations under MTCA, Version 3.1, Washington State Department of Ecology Publication No. 94-145, updated November 2001.

GeoEngineers = GeoEngineers, Inc.

Farallon = Farallon Consulting, L.L.C.

Table 4
Summary of Indoor Air Sample Results
Cleaning Center of Redmond
Redmond, Washington
Farallon PN: 650-001

Sample ID	Sample Location	Date Collected	Analytical Results (micrograms per cubic meter)	
			Tetrachloroethene	Trichloroethene
IA-1	Staple's Building, women's restroom - adjacent to the floor drain	6/12/2007	1.4	<0.19
IA-2	Staple's Building, women's restroom - breathing zone	6/12/2007	1.4	<0.19
NIOSH Recommended Exposure Limit¹			NA²	134,250³
OSHA TWA Permissible Exposure Limits⁴			678,000	537,000
MTCA Standard Method B Formula Values for Air⁵			NE	0.515
Washington DOH Background Concentration⁶			5	0.7

NOTES:

< Indicates compound not detected above the stated laboratory practical quantitation limit.

DOH = Washington State Department of Health

¹National Institute for Occupational Safety and Health (NIOSH) recommended exposure limit (REL) are a time-weighted average for a 10-hour workday during a 40-hour workweek.

NA = Not Applicable

NE = Not Established

²No numerical value established. The compound is a known carcinogen. NIOSH has a carcinogen policy which bases exposure limits for carcinogens on risk evaluations and potential exposures. NIOSH recommends minimization of workplace exposure concentration.

³NIOSH considers TCE to be a potential occupational carcinogen and recommends an REL of 25 ppm (as a 10-hour TWA)

⁴OSHA permissible exposure limits (PEL) are time-weighted averages which must not be exceeded during any 8-hour workshift of a 40-hour workweek.

⁵Washington State Department of Ecology Model Toxics Control Act Cleanup Regulation (MTCA) Standard Method B Formula Values for ambient air, including both ambient outdoor air and air within structures.

⁶Washington State Department of Health (DOH) expressed indoor median background concentration.

**APPENDIX A
BORING LOGS**

SITE CLOSURE REPORT
Cleaning Center of Redmond
15796 Redmond Way
Redmond, Washington

Farallon PN: 650-001



USCS Classification and Graphic Legend

Major Divisions	USCS Graphic Symbol	USCS Letter Symbol	Lithologic Description
-----------------	---------------------	--------------------	------------------------

Coarse-Grained Soil (More than 50% of material is larger than No. 200 sieve size)	GRAVEL AND GRAVELLY SOIL (More than 50% of coarse fraction retained on No. 4 sieve)	CLEAN GRAVEL (Little or no fines)		GW	Well graded GRAVEL, well graded GRAVEL with sand
		GRAVEL WITH FINES (Appreciable amount of fines)		GP	Poorly graded GRAVEL, GRAVEL with sand
				GP-GM	Poorly graded GRAVEL - GRAVEL with sand and silt
				GM	Silty GRAVEL
	SAND AND SANDY SOIL (More than 50% of coarse fraction passed through No. 4 sieve)	CLEAN SAND (Little or no fines)		GC	Clayey GRAVEL
				SW	Well graded SAND
		SAND WITH FINES (Appreciable amount of fines)		SP	Poorly graded SAND
				SP-SM	Poorly graded SAND - silty SAND
				SM	Silty SAND
				SC	Clayey SAND
Fine-Grained Soil (More than 50% of material is smaller than No. 200 sieve size)	SILT AND CLAY (Liquid limit less than 50)		SM-ML	SILT - Silty SAND	
			ML	SILT	
			CL	CLAY	
	SILT AND CLAY (Liquid limit greater than 50)		OL	Organic SILT	
			MH	Inorganic SILT	
			CH	Inorganic CLAY	
			OH	Organic CLAY	
	Highly Organic Soil		PT	Peat	
OTHER MATERIALS	PAVEMENT		AC	Asphalt concrete	
			CO	Concrete	
	OTHER		RK	Bedrock	
			WD	Wood Debris	
			DB	Debris (Miscellaneous)	
			PC	Portland cement	

Legend

	Sample Interval		Cement Grout		Solid line indicates sharp contact between units well defined.
	Grab Sample Interval		Bentonite		Dashed line indicates gradational contact between units.
	Water level at time of drilling		Sand Pack		feet bgs = feet below ground surface
	Water level at time of sampling		Well Cap		NE = Not Encountered
	Blank Casing				NA = Not Applicable
	Screened Casing				PID = Photoionization Detector

feet bgs = feet below ground surface

NE = Not Encountered

NA = Not Applicable

PID = Photoionization Detector

PN = Project Number

units = PID units calibrated to 100 ppm isobutylene

USCS = Unified Soil Classification System



Client: Nelson Real Estate Mngmnt
Project: Cleaning Center of Redmond
Location: Redmond, WA

Date/Time Started: 6/1/07 1225
Date/Time Completed: 6/1/07 0200
Equipment: Limited Access GP
Drilling Company: Cascade Drilling
Drilling Foreman: Jayman Lauer
Drilling Method: Geoprobe

Sampler Type: 4' Macrocore
Drive Hammer (lbs.): 140
Depth of Water ATD (ft bgs): NA
Total Boring Depth (ft bgs): 10
Total Well Depth (ft bgs): NA

Farallon PN: 650-001

Logged By: J. Cyr

Depth (feet bgs.)	Sample Interval	Lithologic Description	USCS	USGS Graphic	% Recovery	Blow Counts 8/8/8	PID (units)	Sample ID	Sample Analyzed	Boring/Well Construction Details
0		0-4" Concrete		CONCRETE PLUG						Concrete
		4"-4' SAND, medium to coarse, with fine to coarse gravel, brown, moist, no odor.	SP		50	-	3.1	FB1-1	X	
		4'-10' SAND, medium, with fine to coarse gravel, grey, moist, no odor.	SP		80	-	5.6	FB106	X	
5										Bentonite
					100	-	8.1	FB1-10	X	
10										

Well Construction Information

Monument Type: NA	Filter Pack: NA	Ground Surface Elevation (ft): NA
Casing Diameter (inches): NA	Surface Seal: Concrete	Top of Casing Elevation (ft): NA
Screen Slot Size (inches): NA	Annular Seal: Bentonite Chips	Boring Abandonment: Bentonite Chips
Screened Interval (ft bgs): NA	Surveyed Location: X: NA Y: NA	



Client: Nelson Real Estate Mngmnt
Project: Cleaning Center of Redmond
Location: Redmond, WA

Date/Time Started: 6/1/07 0205 **Sampler Type:** 4' Macrocore
Date/Time Completed: 6/1/07 0220 **Drive Hammer (lbs.):** 140
Equipment: Limited Access GP **Depth of Water ATD (ft bgs):** NA
Drilling Company: Cascade Drilling **Total Boring Depth (ft bgs):** 4
Drilling Foreman: Jayman Lauer **Total Well Depth (ft bgs):** NA
Drilling Method: Geoprobe

Farallon PN: 650-001

Logged By: J. Cyr

Depth (feet bgs.)	Sample Interval	Lithologic Description	USCS	USGS Graphic	% Recovery	Blow Counts 8/8/8	PID (units)	Sample ID	Sample Analyzed	Boring/Well Construction Details
0		0-4" Concrete	CONCRETE PLUG							Concrete
		4"-4' SAND, fine to coarse, with fine to coarse gravel, trace silt, brown, moist, no odor.	SP		50	-	8.5	FB2-1	X	Bentonite
5										
10										

Well Construction Information

Monument Type: NA	Filter Pack: NA	Ground Surface Elevation (ft): NA
Casing Diameter (inches): NA	Surface Seal: Concrete	Top of Casing Elevation (ft): NA
Screen Slot Size (inches): NA	Annular Seal: Bentonite Chips	Boring Abandonment: Bentonite Chips
Screened Interval (ft bgs): NA	Surveyed Location: X: NA Y: NA	



Client: Nelson Real Estate Mngmnt
Project: Cleaning Center of Redmond
Location: Redmond, WA

Date/Time Started: 6/12/07 0830 **Sampler Type:** 4' Macrocore
Date/Time Completed: 6/12/07 0930 **Drive Hammer (lbs.):** 140
Equipment: Limited Access GP **Depth of Water ATD (ft bgs):** 10
Drilling Company: Cascade Drilling **Total Boring Depth (ft bgs):** 11
Drilling Foreman: Jayman Lauer **Total Well Depth (ft bgs):** NA
Drilling Method: Hand Auger/Geoprobe

Farallon PN: 650-001

Logged By: J. Cyr

Depth (feet bgs.)	Sample Interval	Lithologic Description	USCS	USGS Graphic	% Recovery	Blow Counts 8'/8'	PID (units)	Sample ID	Sample Analyzed	Boring/Well Construction Details
0		0-3" Asphalt.	ASPHAL							Concrete
		1'-1.5' SAND, medium, with fine gravel, brown, wet, sulfuric odor (collected by hand auger).	SP		100	-	0.0	FB3-1	X	
		4'-4.5' SILT with fine sand, brown, moist, organic matter, no odor (collected by hand auger).	ML		100	-	0.4	FB3-4		
		6'-6.5' SAND, fine, minor silt, blackish-brown, moist, no odor (collected by hand auger).	SP		100	-	0.1	FB3-6	X	Bentonite
		8'-8.5' SAND, fine to medium, light greyish-brown, moist, no odor, few pieces of wood (collected with hand auger).	SP		100	-	0.0	FB3-8		
		8.5'-10' Same as above, wet at 10 feet below ground surface, no wood.			80	-	0.0	FB3-9	X	
		10'-11' SAND, medium to coarse, with fine gravel, wet, brownish-grey, no odor.								SZ

Well Construction Information

Monument Type: NA	Filter Pack: NA	Ground Surface Elevation (ft): NA
Casing Diameter (inches): NA	Surface Seal: Concrete	Top of Casing Elevation (ft): NA
Screen Slot Size (inches): NA	Annular Seal: Bentonite Chips	Boring Abandonment: Bentonite Chips
Screened Interval (ft bgs): NA	Surveyed Location: X: NA Y: NA	



Client: Nelson Real Estate Mngmnt
Project: Cleaning Center of Redmond
Location: Redmond, WA

Date/Time Started: 6/12/07 1000 **Sampler Type:** 4' Macrocore
Date/Time Completed: 6/12/07 1100 **Drive Hammer (lbs.):** 140
Equipment: Limited Access GP **Depth of Water ATD (ft bgs):** 10
Drilling Company: Cascade Drilling **Total Boring Depth (ft bgs):** 12
Drilling Foreman: Jayman Lauer **Total Well Depth (ft bgs):** NA
Drilling Method: Geoprobe

Farallon PN: 650-001

Logged By: J. Cyr

Depth (feet bgs.)	Sample Interval	Lithologic Description	USCS	USGS Graphic	% Recovery	Blow Counts 8/8/8	PID (units)	Sample ID	Sample Analyzed	Boring/Well Construction Details
0		0-6" Concrete		CONCRETE PLUG						Concrete
		6"-1' SAND, fine to coarse, minor fine gravel, brownish-orange, moist, no odor (collected by hand auger).	SP		100	-	0.0	FB4-0.5	X	
		5'-5.9.5' SAND, fine to medium, trace fine gravel, light greyish-brown, moist, no odor (collected by hand auger from 5' to 5.5').	SP		100	-	0.0	FB4-5	X	
		9.5'-10' SAND, fine, light brown, moist, wet at 10', no odor.			100	-	0.0			
		10'-11.75' Same as above, fine to medium sand.								Bentonite
					100	-	0.0	FB4-7		
					100	-	0.0	FB4-9	X	
		11.75'-12' Gravelly SAND, medium to coarse sand, fine gravel, brown, wet, no odor.								

Well Construction Information

Monument Type: NA	Filter Pack: NA	Ground Surface Elevation (ft): NA
Casing Diameter (inches): NA	Surface Seal: Concrete	Top of Casing Elevation (ft): NA
Screen Slot Size (inches): NA	Annular Seal: Bentonite Chips	Boring Abandonment: Bentonite Chips
Screened Interval (ft bgs): NA	Surveyed Location: X: NA Y: NA	



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975 5th Avenue Northwest
Issaquah, WA 98027

Log of Boring: FB-5

Client: Nelson Real Estate Mngmnt
Project: Cleaning Center of Redmond
Location: Redmond, WA

Date/Time Started: 6/12/07 1105
Date/Time Completed: 6/12/07 1140
Equipment: Limited Access GP
Drilling Company: Cascade Drilling
Drilling Foreman: Jayman Lauer
Drilling Method: Geoprobe
Sampler Type: 4' Macrocore
Drive Hammer (lbs.): 140
Depth of Water ATD (ft bgs): NA
Total Boring Depth (ft bgs): 8
Total Well Depth (ft bgs): NA

Farallon PN: 650-001

Logged By: J. Cyr

Depth (feet bgs.)	Sample Interval	Lithologic Description	USCS	USGS Graphic	% Recovery	Blow Counts 8/8/8	PID (units)	Sample ID	Sample Analyzed	Boring/Well Construction Details
0	0-4"	Concrete	CONCRE PLUG							Concrete
	6"-3'	Pea gravel.	GP		80	-	0.1	FB5-0.5	X	
	3'-3.5'	SAND, fine to medium, with fine to coarse gravel, trace silt, dark brown, moist, no odor.	SP					FB5-3	X	
	3.5'-4'	Same as above, no gravel or silt, grey.								
	4'-8'	Same as above, trace to minor silt.			90	-	0.3	FB5-5	X	Bentonite

Well Construction Information

Monument Type: NA	Filter Pack: NA	Ground Surface Elevation (ft): NA
Casing Diameter (inches): NA	Surface Seal: Concrete	Top of Casing Elevation (ft): NA
Screen Slot Size (inches): NA	Annular Seal: Bentonite Chips	Boring Abandonment: Bentonite Chips
Screened Interval (ft bgs): NA	Surveyed Location: X: NA Y: NA	



Client: Nelson Real Estate Mngmnt
Project: Cleaning Center of Redmond
Location: Redmond, WA

Date/Time Started: 06/20/07 0745
Date/Time Completed: 06/20/07 0930
Equipment: CME 75
Drilling Company: Cascade Drilling
Drilling Foreman: James Goebel
Drilling Method: Hollow Stem Auger

Sampler Type: D&M SS 18"x2"
Drive Hammer (lbs.): 300
Depth of Water ATD (ft bgs): 16.5
Total Boring Depth (ft bgs): 26.5
Total Well Depth (ft bgs): 25

Farallon PN: 650-001

Logged By: D. Clement

Depth (feet bgs.)	Sample Interval	Lithologic Description	USCS	USGS Graphic	% Recovery	Blow Counts 8/8/8	PID (units)	Sample ID	Sample Analyzed	Boring/Well Construction Details
0										Cap
										Grout
5		5'-6.5' SAND, fine to coarse, with fine to coarse gravel, light brown, medium dense, moist, no odor	SW			10012/15/16	673	MW10-6		Casing
										Bentonite
10		10'-11.5' SAND, fine to coarse, minor fine gravel and silt, dark reddish-brown, medium dense, moist, no odor	SW			10015/15/14	754	MW10-11		
15		Sampler broke in boring, drill to 25 feet below ground surface.								Screen
20										Sand
25		25'-26.5' SAND, fine to coarse, mostly coarse, minor silt, dark brown, medium dense, wet, no odor	SP		50	14/16/16	81.0	MW10-26		

Well Construction Information

Monument Type: Flush mount	Filter Pack: Sand	Ground Surface Elevation (ft): NA
Casing Diameter (inches): 2	Surface Seal: Cement	Top of Casing Elevation (ft): NA
Screen Slot Size (inches): 0.010	Annular Seal: Bentonite	Boring Abandonment: NA
Screened Interval (ft bgs): 10-25	Surveyed Location: X: NA	Y: NA

APPENDIX B
LABORATORY ANALYTICAL REPORTS

SITE CLOSURE REPORT
Cleaning Center of Redmond
15796 Redmond Way
Redmond, Washington

Farallon PN: 650-001



14648 NE 95th Street, Redmond, WA 98052 • (425) 883-3881

May 21, 2007

Jennifer Cyr
Farallon Consulting, LLC
975 5th Avenue NW
Issaquah, WA 98027

Re: Analytical Data for Project 650-001
Laboratory Reference No. 0705-139

Dear Jennifer:

Enclosed are the analytical results and associated quality control data for samples submitted on May 15, 2007.

The standard policy of OnSite Environmental Inc. is to store your samples for 30 days from the date of receipt. If you require longer storage, please contact the laboratory.

We appreciate the opportunity to be of service to you on this project. If you have any questions concerning the data, or need additional information, please feel free to call me.

Sincerely,

A handwritten signature in black ink, appearing to read 'DB', with a horizontal line extending to the right.

David Baumeister
Project Manager

Enclosures

Date of Report: May 21, 2007
Samples Submitted: May 15, 2007
Laboratory Reference: 0705-139
Project: 650-001

Case Narrative

Samples were collected on May 15, 2007 and received by the laboratory on May 15, 2007. They were maintained at the laboratory at a temperature of 2°C to 6°C except as noted below.

General QA/QC issues associated with the analytical data enclosed in this laboratory report will be indicated with a reference to a comment or explanation on the Data Qualifier page. More complex and involved QA/QC issues will be discussed in detail below.

Date of Report: May 21, 2007
 Samples Submitted: May 15, 2007
 Laboratory Reference: 0705-139
 Project: 650-001

HALOGENATED VOLATILES by EPA 8260B

page 1 of 2

Date Extracted: 5-16-07
 Date Analyzed: 5-16-07
 Matrix: Water
 Units: ug/L (ppb)
 Lab ID: 05-139-01
 Client ID: MW3-051507

Compound	Results	Flags	PQL
Dichlorodifluoromethane	ND		0.20
Chloromethane	ND		0.20
Vinyl Chloride	ND		0.20
Bromomethane	ND		0.20
Chloroethane	ND		0.20
Trichlorofluoromethane	ND		0.20
1,1-Dichloroethene	ND		0.20
Iodomethane	ND		1.0
Methylene Chloride	ND		1.0
(trans) 1,2-Dichloroethene	ND		0.20
1,1-Dichloroethane	ND		0.20
2,2-Dichloropropane	ND		0.20
(cis) 1,2-Dichloroethene	ND		0.20
Bromochloromethane	ND		0.20
Chloroform	ND		0.20
1,1,1-Trichloroethane	ND		0.20
Carbon Tetrachloride	ND		0.20
1,1-Dichloropropene	ND		0.20
1,2-Dichloroethane	ND		0.20
Trichloroethene	ND		0.20
1,2-Dichloropropane	ND		0.20
Dibromomethane	ND		0.20
Bromodichloromethane	ND		0.20
2-Chloroethyl Vinyl Ether	ND		1.0
(cis) 1,3-Dichloropropene	ND		0.20
(trans) 1,3-Dichloropropene	ND		0.20

Date of Report: May 21, 2007
 Samples Submitted: May 15, 2007
 Laboratory Reference: 0705-139
 Project: 650-001

HALOGENATED VOLATILES by EPA 8260B
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Lab ID: 05-139-01
 Client ID: MW3-051507

Compound	Results	Flags	PQL
1,1,2-Trichloroethane	ND		0.20
Tetrachloroethene	2.5		1.0
1,3-Dichloropropane	ND		0.20
Dibromochloromethane	ND		0.20
1,2-Dibromoethane	ND		0.20
Chlorobenzene	ND		0.20
1,1,1,2-Tetrachloroethane	ND		0.20
Bromoform	ND		1.0
Bromobenzene	ND		0.20
1,1,2,2-Tetrachloroethane	ND		0.20
1,2,3-Trichloropropane	ND		0.20
2-Chlorotoluene	ND		0.20
4-Chlorotoluene	ND		0.20
1,3-Dichlorobenzene	ND		0.20
1,4-Dichlorobenzene	ND		0.20
1,2-Dichlorobenzene	ND		0.20
1,2-Dibromo-3-chloropropane	ND		1.0
1,2,4-Trichlorobenzene	ND		0.20
Hexachlorobutadiene	ND		0.20
1,2,3-Trichlorobenzene	ND		0.20
	Percent		Control
Surrogate	Recovery		Limits
Dibromofluoromethane	84		71-126
Toluene, d8	91		76-116
4-Bromofluorobenzene	89		70-123

Date of Report: May 21, 2007
 Samples Submitted: May 15, 2007
 Laboratory Reference: 0705-139
 Project: 650-001

HALOGENATED VOLATILES by EPA 8260B

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Date Extracted: 5-16-07
 Date Analyzed: 5-16-07
 Matrix: Water
 Units: ug/L (ppb)
 Lab ID: 05-139-02
 Client ID: MW7-051507

Compound	Results	Flags	PQL
Dichlorodifluoromethane	ND		0.20
Chloromethane	ND		0.20
Vinyl Chloride	ND		0.20
Bromomethane	ND		0.20
Chloroethane	ND		0.20
Trichlorofluoromethane	ND		0.20
1,1-Dichloroethene	ND		0.20
Iodomethane	ND		1.0
Methylene Chloride	ND		1.0
(trans) 1,2-Dichloroethene	ND		0.20
1,1-Dichloroethane	ND		0.20
2,2-Dichloropropane	ND		0.20
(cis) 1,2-Dichloroethene	ND		0.20
Bromochloromethane	ND		0.20
Chloroform	0.48		0.20
1,1,1-Trichloroethane	ND		0.20
Carbon Tetrachloride	ND		0.20
1,1-Dichloropropene	ND		0.20
1,2-Dichloroethane	ND		0.20
Trichloroethene	ND		0.20
1,2-Dichloropropane	ND		0.20
Dibromomethane	ND		0.20
Bromodichloromethane	ND		0.20
2-Chloroethyl Vinyl Ether	ND		1.0
(cis) 1,3-Dichloropropene	ND		0.20
(trans) 1,3-Dichloropropene	ND		0.20

Date of Report: May 21, 2007
 Samples Submitted: May 15, 2007
 Laboratory Reference: 0705-139
 Project: 650-001

HALOGENATED VOLATILES by EPA 8260B
 page 2 of 2

Lab ID: 05-139-02
 Client ID: MW7-051507

Compound	Results	Flags	PQL
1,1,2-Trichloroethane	ND		0.20
Tetrachloroethene	2.9		1.0
1,3-Dichloropropane	ND		0.20
Dibromochloromethane	ND		0.20
1,2-Dibromoethane	ND		0.20
Chlorobenzene	ND		0.20
1,1,1,2-Tetrachloroethane	ND		0.20
Bromoform	ND		1.0
Bromobenzene	ND		0.20
1,1,2,2-Tetrachloroethane	ND		0.20
1,2,3-Trichloropropane	ND		0.20
2-Chlorotoluene	ND		0.20
4-Chlorotoluene	ND		0.20
1,3-Dichlorobenzene	ND		0.20
1,4-Dichlorobenzene	ND		0.20
1,2-Dichlorobenzene	ND		0.20
1,2-Dibromo-3-chloropropane	ND		1.0
1,2,4-Trichlorobenzene	ND		0.20
Hexachlorobutadiene	ND		0.20
1,2,3-Trichlorobenzene	ND		0.20

Surrogate	Percent Recovery	Control Limits
Dibromofluoromethane	85	71-126
Toluene, d8	90	76-116
4-Bromofluorobenzene	89	70-123

Date of Report: May 21, 2007
 Samples Submitted: May 15, 2007
 Laboratory Reference: 0705-139
 Project: 650-001

HALOGENATED VOLATILES by EPA 8260B

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Date Extracted: 5-16-07
 Date Analyzed: 5-16-07
 Matrix: Water
 Units: ug/L (ppb)
 Lab ID: 05-139-03
 Client ID: MW2-051507

Compound	Results	Flags	PQL
Dichlorodifluoromethane	ND		0.20
Chloromethane	ND		0.20
Vinyl Chloride	ND		0.20
Bromomethane	ND		0.20
Chloroethane	ND		0.20
Trichlorofluoromethane	ND		0.20
1,1-Dichloroethene	ND		0.20
Iodomethane	ND		1.0
Methylene Chloride	ND		1.0
(trans) 1,2-Dichloroethene	ND		0.20
1,1-Dichloroethane	ND		0.20
2,2-Dichloropropane	ND		0.20
(cis) 1,2-Dichloroethene	ND		0.20
Bromochloromethane	ND		0.20
Chloroform	0.49		0.20
1,1,1-Trichloroethane	ND		0.20
Carbon Tetrachloride	ND		0.20
1,1-Dichloropropene	ND		0.20
1,2-Dichloroethane	ND		0.20
Trichloroethene	ND		0.20
1,2-Dichloropropane	ND		0.20
Dibromomethane	ND		0.20
Bromodichloromethane	ND		0.20
2-Chloroethyl Vinyl Ether	ND		1.0
(cis) 1,3-Dichloropropene	ND		0.20
(trans) 1,3-Dichloropropene	ND		0.20

Date of Report: May 21, 2007
 Samples Submitted: May 15, 2007
 Laboratory Reference: 0705-139
 Project: 650-001

HALOGENATED VOLATILES by EPA 8260B

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Lab ID: 05-139-03
 Client ID: MW2-051507

Compound	Results	Flags	PQL
1,1,2-Trichloroethane	ND		0.20
Tetrachloroethene	1.3		1.0
1,3-Dichloropropane	ND		0.20
Dibromochloromethane	ND		0.20
1,2-Dibromoethane	ND		0.20
Chlorobenzene	ND		0.20
1,1,1,2-Tetrachloroethane	ND		0.20
Bromoform	ND		1.0
Bromobenzene	ND		0.20
1,1,2,2-Tetrachloroethane	ND		0.20
1,2,3-Trichloropropane	ND		0.20
2-Chlorotoluene	ND		0.20
4-Chlorotoluene	ND		0.20
1,3-Dichlorobenzene	ND		0.20
1,4-Dichlorobenzene	ND		0.20
1,2-Dichlorobenzene	ND		0.20
1,2-Dibromo-3-chloropropane	ND		1.0
1,2,4-Trichlorobenzene	ND		0.20
Hexachlorobutadiene	ND		0.20
1,2,3-Trichlorobenzene	ND		0.20

Surrogate	Percent Recovery	Control Limits
Dibromofluoromethane	85	71-126
Toluene, d8	89	76-116
4-Bromofluorobenzene	89	70-123

Date of Report: May 21, 2007
 Samples Submitted: May 15, 2007
 Laboratory Reference: 0705-139
 Project: 650-001

HALOGENATED VOLATILES by EPA 8260B

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Date Extracted: 5-16-07
 Date Analyzed: 5-16-07
 Matrix: Water
 Units: ug/L (ppb)
 Lab ID: 05-139-04
 Client ID: MW1-051507

Compound	Results	Flags	PQL
Dichlorodifluoromethane	ND		0.20
Chloromethane	ND		0.20
Vinyl Chloride	ND		0.20
Bromomethane	ND		0.20
Chloroethane	ND		0.20
Trichlorofluoromethane	ND		0.20
1,1-Dichloroethene	ND		0.20
Iodomethane	ND		1.0
Methylene Chloride	ND		1.0
(trans) 1,2-Dichloroethene	ND		0.20
1,1-Dichloroethane	ND		0.20
2,2-Dichloropropane	ND		0.20
(cis) 1,2-Dichloroethene	ND		0.20
Bromochloromethane	ND		0.20
Chloroform	0.26		0.20
1,1,1-Trichloroethane	ND		0.20
Carbon Tetrachloride	ND		0.20
1,1-Dichloropropene	ND		0.20
1,2-Dichloroethane	ND		0.20
Trichloroethene	ND		0.20
1,2-Dichloropropane	ND		0.20
Dibromomethane	ND		0.20
Bromodichloromethane	ND		0.20
2-Chloroethyl Vinyl Ether	ND		1.0
(cis) 1,3-Dichloropropene	ND		0.20
(trans) 1,3-Dichloropropene	ND		0.20

Date of Report: May 21, 2007
 Samples Submitted: May 15, 2007
 Laboratory Reference: 0705-139
 Project: 650-001

HALOGENATED VOLATILES by EPA 8260B
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Lab ID: 05-139-04
 Client ID: MW1-051507

Compound	Results	Flags	PQL
1,1,2-Trichloroethane	ND		0.20
Tetrachloroethene	3.3		1.0
1,3-Dichloropropane	ND		0.20
Dibromochloromethane	ND		0.20
1,2-Dibromoethane	ND		0.20
Chlorobenzene	ND		0.20
1,1,1,2-Tetrachloroethane	ND		0.20
Bromoform	ND		1.0
Bromobenzene	ND		0.20
1,1,1,2-Tetrachloroethane	ND		0.20
1,2,3-Trichloropropane	ND		0.20
2-Chlorotoluene	ND		0.20
4-Chlorotoluene	ND		0.20
1,3-Dichlorobenzene	ND		0.20
1,4-Dichlorobenzene	ND		0.20
1,2-Dichlorobenzene	ND		0.20
1,2-Dibromo-3-chloropropane	ND		1.0
1,2,4-Trichlorobenzene	ND		0.20
Hexachlorobutadiene	ND		0.20
1,2,3-Trichlorobenzene	ND		0.20

Surrogate	Percent Recovery	Control Limits
Dibromofluoromethane	85	71-126
Toluene, d8	91	76-116
4-Bromofluorobenzene	88	70-123

Date of Report: May 21, 2007
 Samples Submitted: May 15, 2007
 Laboratory Reference: 0705-139
 Project: 650-001

HALOGENATED VOLATILES by EPA 8260B
 page 1 of 2

Date Extracted: 5-16-07
 Date Analyzed: 5-16-07
 Matrix: Water
 Units: ug/L (ppb)
 Lab ID: 05-139-05
 Client ID: MW9-051507

Compound	Results	Flags	PQL
Dichlorodifluoromethane	ND		0.20
Chloromethane	ND		0.20
Vinyl Chloride	ND		0.20
Bromomethane	ND		0.20
Chloroethane	ND		0.20
Trichlorofluoromethane	ND		0.20
1,1-Dichloroethene	ND		0.20
Iodomethane	ND		1.0
Methylene Chloride	ND		1.0
(trans) 1,2-Dichloroethene	ND		0.20
1,1-Dichloroethane	ND		0.20
2,2-Dichloropropane	ND		0.20
(cis) 1,2-Dichloroethene	ND		0.20
Bromochloromethane	ND		0.20
Chloroform	0.51		0.20
1,1,1-Trichloroethane	ND		0.20
Carbon Tetrachloride	ND		0.20
1,1-Dichloropropene	ND		0.20
1,2-Dichloroethane	ND		0.20
Trichloroethene	ND		0.20
1,2-Dichloropropane	ND		0.20
Dibromomethane	ND		0.20
Bromodichloromethane	ND		0.20
2-Chloroethyl Vinyl Ether	ND		1.0
(cis) 1,3-Dichloropropene	ND		0.20
(trans) 1,3-Dichloropropene	ND		0.20

Date of Report: May 21, 2007
 Samples Submitted: May 15, 2007
 Laboratory Reference: 0705-139
 Project: 650-001

HALOGENATED VOLATILES by EPA 8260B
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Lab ID: 05-139-05
 Client ID: MW9-051507

Compound	Results	Flags	PQL
1,1,2-Trichloroethane	ND		0.20
Tetrachloroethene	1.8		1.0
1,3-Dichloropropane	ND		0.20
Dibromochloromethane	ND		0.20
1,2-Dibromoethane	ND		0.20
Chlorobenzene	ND		0.20
1,1,1,2-Tetrachloroethane	ND		0.20
Bromoform	ND		1.0
Bromobenzene	ND		0.20
1,1,2,2-Tetrachloroethane	ND		0.20
1,2,3-Trichloropropane	ND		0.20
2-Chlorotoluene	ND		0.20
4-Chlorotoluene	ND		0.20
1,3-Dichlorobenzene	ND		0.20
1,4-Dichlorobenzene	ND		0.20
1,2-Dichlorobenzene	ND		0.20
1,2-Dibromo-3-chloropropane	ND		1.0
1,2,4-Trichlorobenzene	ND		0.20
Hexachlorobutadiene	ND		0.20
1,2,3-Trichlorobenzene	ND		0.20

Surrogate	Percent Recovery	Control Limits
Dibromofluoromethane	85	71-126
Toluene, d8	90	76-116
4-Bromofluorobenzene	90	70-123

Date of Report: May 21, 2007
 Samples Submitted: May 15, 2007
 Laboratory Reference: 0705-139
 Project: 650-001

HALOGENATED VOLATILES by EPA 8260B
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Date Extracted: 5-16-07
 Date Analyzed: 5-16-07
 Matrix: Water
 Units: ug/L (ppb)
 Lab ID: 05-139-06
 Client ID: MW3-FD-051507

Compound	Results	Flags	PQL
Dichlorodifluoromethane	ND		0.20
Chloromethane	ND		0.20
Vinyl Chloride	ND		0.20
Bromomethane	ND		0.20
Chloroethane	ND		0.20
Trichlorofluoromethane	ND		0.20
1,1-Dichloroethene	ND		0.20
Iodomethane	ND		1.0
Methylene Chloride	ND		1.0
(trans) 1,2-Dichloroethene	ND		0.20
1,1-Dichloroethane	ND		0.20
2,2-Dichloropropane	ND		0.20
(cis) 1,2-Dichloroethene	ND		0.20
Bromochloromethane	ND		0.20
Chloroform	ND		0.20
1,1,1-Trichloroethane	ND		0.20
Carbon Tetrachloride	ND		0.20
1,1-Dichloropropene	ND		0.20
1,2-Dichloroethane	ND		0.20
Trichloroethene	ND		0.20
1,2-Dichloropropane	ND		0.20
Dibromomethane	ND		0.20
Bromodichloromethane	ND		0.20
2-Chloroethyl Vinyl Ether	ND		1.0
(cis) 1,3-Dichloropropene	ND		0.20
(trans) 1,3-Dichloropropene	ND		0.20

Date of Report: May 21, 2007
 Samples Submitted: May 15, 2007
 Laboratory Reference: 0705-139
 Project: 650-001

HALOGENATED VOLATILES by EPA 8260B
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Lab ID: 05-139-06
 Client ID: MW3-FD-051507

Compound	Results	Flags	PQL
1,1,2-Trichloroethane	ND		0.20
Tetrachloroethene	2.3		1.0
1,3-Dichloropropane	ND		0.20
Dibromochloromethane	ND		0.20
1,2-Dibromoethane	ND		0.20
Chlorobenzene	ND		0.20
1,1,1,2-Tetrachloroethane	ND		0.20
Bromoform	ND		1.0
Bromobenzene	ND		0.20
1,1,2,2-Tetrachloroethane	ND		0.20
1,2,3-Trichloropropane	ND		0.20
2-Chlorotoluene	ND		0.20
4-Chlorotoluene	ND		0.20
1,3-Dichlorobenzene	ND		0.20
1,4-Dichlorobenzene	ND		0.20
1,2-Dichlorobenzene	ND		0.20
1,2-Dibromo-3-chloropropane	ND		1.0
1,2,4-Trichlorobenzene	ND		0.20
Hexachlorobutadiene	ND		0.20
1,2,3-Trichlorobenzene	ND		0.20

Surrogate	Percent Recovery	Control Limits
Dibromofluoromethane	84	71-126
Toluene, d8	90	76-116
4-Bromofluorobenzene	88	70-123

Date of Report: May 21, 2007
 Samples Submitted: May 15, 2007
 Laboratory Reference: 0705-139
 Project: 650-001

**HALOGENATED VOLATILES by EPA 8260B
 METHOD BLANK QUALITY CONTROL**

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Date Extracted: 5-16-07
 Date Analyzed: 5-16-07
 Matrix: Water
 Units: ug/L (ppb)
 Lab ID: MB0516W1

Compound	Results	Flags	PQL
Dichlorodifluoromethane	ND		0.20
Chloromethane	ND		0.20
Vinyl Chloride	ND		0.20
Bromomethane	ND		0.20
Chloroethane	ND		0.20
Trichlorofluoromethane	ND		0.20
1,1-Dichloroethene	ND		0.20
Iodomethane	ND		1.0
Methylene Chloride	ND		1.0
(trans) 1,2-Dichloroethene	ND		0.20
1,1-Dichloroethane	ND		0.20
2,2-Dichloropropane	ND		0.20
(cis) 1,2-Dichloroethene	ND		0.20
Bromochloromethane	ND		0.20
Chloroform	ND		0.20
1,1,1-Trichloroethane	ND		0.20
Carbon Tetrachloride	ND		0.20
1,1-Dichloropropene	ND		0.20
1,2-Dichloroethane	ND		0.20
Trichloroethene	ND		0.20
1,2-Dichloropropane	ND		0.20
Dibromomethane	ND		0.20
Bromodichloromethane	ND		0.20
2-Chloroethyl Vinyl Ether	ND		1.0
(cis) 1,3-Dichloropropene	ND		0.20
(trans) 1,3-Dichloropropene	ND		0.20

Date of Report: May 21, 2007
 Samples Submitted: May 15, 2007
 Laboratory Reference: 0705-139
 Project: 650-001

**HALOGENATED VOLATILES by EPA 8260B
 METHOD BLANK QUALITY CONTROL**

page 2 of 2

Lab ID: MB0516W1

Compound	Results	Flags	PQL
1,1,2-Trichloroethane	ND		0.20
Tetrachloroethene	ND		1.0
1,3-Dichloropropane	ND		0.20
Dibromochloromethane	ND		0.20
1,2-Dibromoethane	ND		0.20
Chlorobenzene	ND		0.20
1,1,1,2-Tetrachloroethane	ND		0.20
Bromoform	ND		1.0
Bromobenzene	ND		0.20
1,1,2,2-Tetrachloroethane	ND		0.20
1,2,3-Trichloropropane	ND		0.20
2-Chlorotoluene	ND		0.20
4-Chlorotoluene	ND		0.20
1,3-Dichlorobenzene	ND		0.20
1,4-Dichlorobenzene	ND		0.20
1,2-Dichlorobenzene	ND		0.20
1,2-Dibromo-3-chloropropane	ND		1.0
1,2,4-Trichlorobenzene	ND		0.20
Hexachlorobutadiene	ND		0.20
1,2,3-Trichlorobenzene	ND		0.20

Surrogate	Percent Recovery	Control Limits
Dibromofluoromethane	87	71-126
Toluene, d8	89	76-116
4-Bromofluorobenzene	89	70-123

Date of Report: May 21, 2007
 Samples Submitted: May 15, 2007
 Laboratory Reference: 0705-139
 Project: 650-001

**HALOGENATED VOLATILES by EPA 8260B
 SB/SBD QUALITY CONTROL**

Date Extracted: 5-16-07
 Date Analyzed: 5-16-07
 Matrix: Water
 Units: ug/L (ppb)

Lab ID: SB0516W 1

Compound	Spike Amount	SB	Percent Recovery	SBD	Percent Recovery	Recovery Limits	Flags
1,1-Dichloroethene	10.0	8.48	85	8.58	86	70-130	
Benzene	10.0	8.51	85	8.80	88	70-130	
Trichloroethene	10.0	9.62	96	9.58	96	70-116	
Toluene	10.0	9.25	93	9.40	94	76-119	
Chlorobenzene	10.0	8.93	89	8.90	89	77-112	

	RPD	RPD Limit	Flags
1,1-Dichloroethene	1	20	
Benzene	3	16	
Trichloroethene	0	16	
Toluene	2	15	
Chlorobenzene	0	15	



Data Qualifiers and Abbreviations

- A - Due to a high sample concentration, the amount spiked is insufficient for meaningful MS/MSD recovery data.
- B - The analyte indicated was also found in the blank sample.
- C - The duplicate RPD is outside control limits due to high result variability when analyte concentrations are within five times the quantitation limit.
- E - The value reported exceeds the quantitation range and is an estimate.
- F - Surrogate recovery data is not available due to the high concentration of coeluting target compounds.
- H - The analyte indicated is a common laboratory solvent and may have been introduced during sample preparation, and be impacting the sample result.
- I - Compound recovery is outside of the control limits.
- J - The value reported was below the practical quantitation limit. The value is an estimate.
- K - Sample duplicate RPD is outside control limits due to sample inhomogeneity. The sample was re-extracted and re-analyzed with similar results.
- L - The RPD is outside of the control limits.
- M - Hydrocarbons in the gasoline range (toluene-naphthalene) are present in the sample.
- O - Hydrocarbons indicative of diesel fuel are present in the sample and are impacting the gasoline result.
- P - The RPD of the detected concentrations between the two columns is greater than 40.
- Q - Surrogate recovery is outside of the control limits.
- S - Surrogate recovery data is not available due to the necessary dilution of the sample.
- T - The sample chromatogram is not similar to a typical _____.
- U - The analyte was analyzed for, but was not detected above the reported sample quantitation limit.
- U1 - The diesel range PQL is elevated due to the presence of lube oil range hydrocarbons.
- V - Matrix Spike/Matrix Spike Duplicate recoveries are outside control limits due to matrix effects.
- W - Matrix Spike/Matrix Spike Duplicate RPD are outside control limits due to matrix effects.
- X - Sample extract treated with a silica gel cleanup procedure.
- Y - Sample extract treated with an acid/silica gel cleanup procedure.
- Z -
- ND - Not Detected at PQL
PQL - Practical Quantitation Limit
RPD - Relative Percent Difference



Chain of Custody

Turnaround Request
(In working days)

Laboratory Number: 05-139

- (Check One)
- Same Day 1 Day
- 2 Day 3 Day
- Standard (7 working days)
(TPH analysis 5 working days)
- _____ (other)

Requested Analysis

Company: Farallon Consulting

Project Number: 650-001

Project Name: Cleaning Center of Redmond

Project Manager: J. Cyr

Sampled by: F. Reider

NWTPH-HCID	NWTPH-Gx/BTEX	NWTPH-Dx	Volatiles by 8260B	Halogenated Volatiles by 8260B	Semivolatiles by 8270C	PAHs by 8270C / SIM	PCBs by 8082	Pesticides by 8081A	Herbicides by 8151A	Total RCRA Metals (8)	TCLP Metals	HEM by 1664	VPH	EPH	% Moisture
				X											
				X											
				X											
				X											
				X											
				X											

Lab ID	Sample Identification	Date Sampled	Time Sampled	Matrix	# of Cont.
1	MW3-051507	5/15/07	0940	w	3
2	MW7-051507	↓	1015	↓	↓
3	MW2-051507	↓	1045	↓	↓
4	MW1-051507	↓	1115	↓	↓
5	MW9-051507	↓	1215	↓	↓
6	MW3-FD-051507	↓	0945	↓	↓

FR

Signature	Company	Date	Time	Comments/Special Instructions:
	Farallon	5/15/07	1237	
	OnSite Inc.	5/15/07	1237	
Relinquished by				
Received by				
Relinquished by				
Received by				
Relinquished by				
Received by				
Reviewed by/Date	Reviewed by/Date	Chromatograms with final report <input type="checkbox"/>		



14648 NE 95th Street, Redmond, WA 98052 • (425) 883-3881

June 7, 2007

Jennifer Cyr
Farallon Consulting, LLC
975 5th Avenue NW
Issaquah, WA 98027

Re: Analytical Data for Project 650-001
Laboratory Reference No. 0706-002

Dear Jennifer:

Enclosed are the analytical results and associated quality control data for samples submitted on June 1, 2007.

The standard policy of OnSite Environmental Inc. is to store your samples for 30 days from the date of receipt. If you require longer storage, please contact the laboratory.

We appreciate the opportunity to be of service to you on this project. If you have any questions concerning the data, or need additional information, please feel free to call me.

Sincerely,

A handwritten signature in black ink, appearing to read 'DB', with a horizontal line extending to the right.

David Baumeister
Project Manager

Enclosures

Date of Report: June 7, 2007
Samples Submitted: June 1, 2007
Laboratory Reference: 0706-002
Project: 650-001

Case Narrative

Samples were collected on June 1, 2007 and received by the laboratory on June 1, 2007. They were maintained at the laboratory at a temperature of 2°C to 6°C except as noted below.

General QA/QC issues associated with the analytical data enclosed in this laboratory report will be indicated with a reference to a comment or explanation on the Data Qualifier page. More complex and involved QA/QC issues will be discussed in detail below.

Halogenated Volatiles EPA 8260B Analysis

Per EPA Method 5035A, samples were received by the laboratory in pre-weighed 40 mL VOA vials within 48 hours of sample collection. They were stored in a freezer at between -7°C and -20°C until extraction or analysis.

Any other QA/QC issues associated with this extraction and analysis will be indicated with a footnote reference and discussed in detail on the Data Qualifier page.

Date of Report: June 7, 2007
 Samples Submitted: June 1, 2007
 Laboratory Reference: 0706-002
 Project: 650-001

HALOGENATED VOLATILES by EPA 8260B

page 1 of 2

Date Extracted: 6-1-07
 Date Analyzed: 6-1-07
 Matrix: Soil
 Units: mg/kg (ppm)
 Lab ID: 06-002-01
 Client ID: FB1-1

Compound	Results	Flags	PQL
Dichlorodifluoromethane	ND		0.0012
Chloromethane	ND		0.0012
Vinyl Chloride	ND		0.0012
Bromomethane	ND		0.0059
Chloroethane	ND		0.0012
Trichlorofluoromethane	ND		0.0012
1,1-Dichloroethene	ND		0.0012
Iodomethane	ND		0.0059
Methylene Chloride	ND		0.0059
(trans) 1,2-Dichloroethene	ND		0.0012
1,1-Dichloroethane	ND		0.0012
2,2-Dichloropropane	ND		0.0012
(cis) 1,2-Dichloroethene	ND		0.0012
Bromochloromethane	ND		0.0012
Chloroform	ND		0.0012
1,1,1-Trichloroethane	ND		0.0012
Carbon Tetrachloride	ND		0.0012
1,1-Dichloropropene	ND		0.0012
1,2-Dichloroethane	ND		0.0012
Trichloroethene	ND		0.0012
1,2-Dichloropropane	ND		0.0012
Dibromomethane	ND		0.0012
Bromodichloromethane	ND		0.0012
2-Chloroethyl Vinyl Ether	ND		0.0059
(cis) 1,3-Dichloropropene	ND		0.0012
(trans) 1,3-Dichloropropene	ND		0.0012

Date of Report: June 7, 2007
 Samples Submitted: June 1, 2007
 Laboratory Reference: 0706-002
 Project: 650-001

HALOGENATED VOLATILES by EPA 8260B

page 2 of 2

Lab ID: 06-002-01
 Client ID: FB1-1

Compound	Results	Flags	PQL
1,1,2-Trichloroethane	ND		0.0012
Tetrachloroethene	0.0043		0.0012
1,3-Dichloropropane	ND		0.0012
Dibromochloromethane	ND		0.0012
1,2-Dibromoethane	ND		0.0012
Chlorobenzene	ND		0.0012
1,1,1,2-Tetrachloroethane	ND		0.0012
Bromoform	ND		0.0012
Bromobenzene	ND		0.0012
1,1,2,2-Tetrachloroethane	ND		0.0012
1,2,3-Trichloropropane	ND		0.0012
2-Chlorotoluene	ND		0.0012
4-Chlorotoluene	ND		0.0012
1,3-Dichlorobenzene	ND		0.0012
1,4-Dichlorobenzene	ND		0.0012
1,2-Dichlorobenzene	ND		0.0012
1,2-Dibromo-3-chloropropane	ND		0.0059
1,2,4-Trichlorobenzene	ND		0.0012
Hexachlorobutadiene	ND		0.0059
1,2,3-Trichlorobenzene	ND		0.0012

Surrogate	Percent Recovery	Control Limits
Dibromofluoromethane	84	70-118
Toluene, d8	83	70-121
4-Bromofluorobenzene	99	70-130

Date of Report: June 7, 2007
 Samples Submitted: June 1, 2007
 Laboratory Reference: 0706-002
 Project: 650-001

HALOGENATED VOLATILES by EPA 8260B
 page 1 of 2

Date Extracted: 6-1-07
 Date Analyzed: 6-1-07
 Matrix: Soil
 Units: mg/kg (ppm)
 Lab ID: 06-002-02
 Client ID: FB1-6

Compound	Results	Flags	PQL
Dichlorodifluoromethane	ND		0.0013
Chloromethane	ND		0.0013
Vinyl Chloride	ND		0.0013
Bromomethane	ND		0.0067
Chloroethane	ND		0.0013
Trichlorofluoromethane	ND		0.0013
1,1-Dichloroethene	ND		0.0013
Iodomethane	ND		0.0067
Methylene Chloride	ND		0.0067
(trans) 1,2-Dichloroethene	ND		0.0013
1,1-Dichloroethane	ND		0.0013
2,2-Dichloropropane	ND		0.0013
(cis) 1,2-Dichloroethene	ND		0.0013
Bromochloromethane	ND		0.0013
Chloroform	ND		0.0013
1,1,1-Trichloroethane	ND		0.0013
Carbon Tetrachloride	ND		0.0013
1,1-Dichloropropene	ND		0.0013
1,2-Dichloroethane	ND		0.0013
Trichloroethene	ND		0.0013
1,2-Dichloropropane	ND		0.0013
Dibromomethane	ND		0.0013
Bromodichloromethane	ND		0.0013
2-Chloroethyl Vinyl Ether	ND		0.0067
(cis) 1,3-Dichloropropene	ND		0.0013
(trans) 1,3-Dichloropropene	ND		0.0013

Date of Report: June 7, 2007
 Samples Submitted: June 1, 2007
 Laboratory Reference: 0706-002
 Project: 650-001

HALOGENATED VOLATILES by EPA 8260B
 page 2 of 2

Lab ID: 06-002-02
 Client ID: FB1-6

Compound	Results	Flags	PQL
1,1,2-Trichloroethane	ND		0.0013
Tetrachloroethene	0.0021		0.0013
1,3-Dichloropropane	ND		0.0013
Dibromochloromethane	ND		0.0013
1,2-Dibromoethane	ND		0.0013
Chlorobenzene	ND		0.0013
1,1,1,2-Tetrachloroethane	ND		0.0013
Bromoform	ND		0.0013
Bromobenzene	ND		0.0013
1,1,1,2,2-Tetrachloroethane	ND		0.0013
1,2,3-Trichloropropane	ND		0.0013
2-Chlorotoluene	ND		0.0013
4-Chlorotoluene	ND		0.0013
1,3-Dichlorobenzene	ND		0.0013
1,4-Dichlorobenzene	ND		0.0013
1,2-Dichlorobenzene	ND		0.0013
1,2-Dibromo-3-chloropropane	ND		0.0067
1,2,4-Trichlorobenzene	ND		0.0013
Hexachlorobutadiene	ND		0.0067
1,2,3-Trichlorobenzene	ND		0.0013

Surrogate	Percent Recovery	Control Limits
Dibromofluoromethane	89	70-118
Toluene, d8	80	70-121
4-Bromofluorobenzene	99	70-130

Date of Report: June 7, 2007
 Samples Submitted: June 1, 2007
 Laboratory Reference: 0706-002
 Project: 650-001

HALOGENATED VOLATILES by EPA 8260B

page 1 of 2

Date Extracted: 6-1-07
 Date Analyzed: 6-1-07
 Matrix: Soil
 Units: mg/kg (ppm)
 Lab ID: 06-002-03
 Client ID: FB1-10

Compound	Results	Flags	PQL
Dichlorodifluoromethane	ND		0.0013
Chloromethane	ND		0.0013
Vinyl Chloride	ND		0.0013
Bromomethane	ND		0.0064
Chloroethane	ND		0.0013
Trichlorofluoromethane	ND		0.0013
1,1-Dichloroethene	ND		0.0013
Iodomethane	ND		0.0064
Methylene Chloride	ND		0.0064
(trans) 1,2-Dichloroethene	ND		0.0013
1,1-Dichloroethane	ND		0.0013
2,2-Dichloropropane	ND		0.0013
(cis) 1,2-Dichloroethene	ND		0.0013
Bromochloromethane	ND		0.0013
Chloroform	ND		0.0013
1,1,1-Trichloroethane	ND		0.0013
Carbon Tetrachloride	ND		0.0013
1,1-Dichloropropene	ND		0.0013
1,2-Dichloroethane	ND		0.0013
Trichloroethene	ND		0.0013
1,2-Dichloropropane	ND		0.0013
Dibromomethane	ND		0.0013
Bromodichloromethane	ND		0.0013
2-Chloroethyl Vinyl Ether	ND		0.0064
(cis) 1,3-Dichloropropene	ND		0.0013
(trans) 1,3-Dichloropropene	ND		0.0013

Date of Report: June 7, 2007
 Samples Submitted: June 1, 2007
 Laboratory Reference: 0706-002
 Project: 650-001

HALOGENATED VOLATILES by EPA 8260B

page 2 of 2

Lab ID: 06-002-03
 Client ID: FB1-10

Compound	Results	Flags	PQL
1,1,2-Trichloroethane	ND		0.0013
Tetrachloroethene	0.0021		0.0013
1,3-Dichloropropane	ND		0.0013
Dibromochloromethane	ND		0.0013
1,2-Dibromoethane	ND		0.0013
Chlorobenzene	ND		0.0013
1,1,1,2-Tetrachloroethane	ND		0.0013
Bromoform	ND		0.0013
Bromobenzene	ND		0.0013
1,1,1,2,2-Tetrachloroethane	ND		0.0013
1,2,3-Trichloropropane	ND		0.0013
2-Chlorotoluene	ND		0.0013
4-Chlorotoluene	ND		0.0013
1,3-Dichlorobenzene	ND		0.0013
1,4-Dichlorobenzene	ND		0.0013
1,2-Dichlorobenzene	ND		0.0013
1,2-Dibromo-3-chloropropane	ND		0.0064
1,2,4-Trichlorobenzene	ND		0.0013
Hexachlorobutadiene	ND		0.0064
1,2,3-Trichlorobenzene	ND		0.0013
	Percent	Control	
Surrogate	Recovery	Limits	
Dibromofluoromethane	85	70-118	
Toluene, d8	85	70-121	
4-Bromofluorobenzene	93	70-130	

Date of Report: June 7, 2007
 Samples Submitted: June 1, 2007
 Laboratory Reference: 0706-002
 Project: 650-001

HALOGENATED VOLATILES by EPA 8260B
 page 1 of 2

Date Extracted: 6-1-07
 Date Analyzed: 6-1-07
 Matrix: Soil
 Units: mg/kg (ppm)
 Lab ID: 06-002-04
 Client ID: FB2-1

Compound	Results	Flags	PQL
Dichlorodifluoromethane	ND		0.0011
Chloromethane	ND		0.0011
Vinyl Chloride	ND		0.0011
Bromomethane	ND		0.0054
Chloroethane	ND		0.0011
Trichlorofluoromethane	ND		0.0011
1,1-Dichloroethene	ND		0.0011
Iodomethane	ND		0.0054
Methylene Chloride	ND		0.0054
(trans) 1,2-Dichloroethene	ND		0.0011
1,1-Dichloroethane	ND		0.0011
2,2-Dichloropropane	ND		0.0011
(cis) 1,2-Dichloroethene	ND		0.0011
Bromochloromethane	ND		0.0011
Chloroform	ND		0.0011
1,1,1-Trichloroethane	ND		0.0011
Carbon Tetrachloride	ND		0.0011
1,1-Dichloropropene	ND		0.0011
1,2-Dichloroethane	ND		0.0011
Trichloroethene	ND		0.0011
1,2-Dichloropropane	ND		0.0011
Dibromomethane	ND		0.0011
Bromodichloromethane	ND		0.0011
2-Chloroethyl Vinyl Ether	ND		0.0054
(cis) 1,3-Dichloropropene	ND		0.0011
(trans) 1,3-Dichloropropene	ND		0.0011

Date of Report: June 7, 2007
 Samples Submitted: June 1, 2007
 Laboratory Reference: 0706-002
 Project: 650-001

HALOGENATED VOLATILES by EPA 8260B
 page 2 of 2

Lab ID: 06-002-04
 Client ID: FB2-1

Compound	Results	Flags	PQL
1,1,2-Trichloroethane	ND		0.0011
Tetrachloroethene	0.0059		0.0011
1,3-Dichloropropane	ND		0.0011
Dibromochloromethane	ND		0.0011
1,2-Dibromoethane	ND		0.0011
Chlorobenzene	ND		0.0011
1,1,1,2-Tetrachloroethane	ND		0.0011
Bromoform	ND		0.0011
Bromobenzene	ND		0.0011
1,1,2,2-Tetrachloroethane	ND		0.0011
1,2,3-Trichloropropane	ND		0.0011
2-Chlorotoluene	ND		0.0011
4-Chlorotoluene	ND		0.0011
1,3-Dichlorobenzene	ND		0.0011
1,4-Dichlorobenzene	ND		0.0011
1,2-Dichlorobenzene	ND		0.0011
1,2-Dibromo-3-chloropropane	ND		0.0054
1,2,4-Trichlorobenzene	ND		0.0011
Hexachlorobutadiene	ND		0.0054
1,2,3-Trichlorobenzene	ND		0.0011

Surrogate	Percent Recovery	Control Limits
Dibromofluoromethane	92	70-118
Toluene, d8	81	70-121
4-Bromofluorobenzene	95	70-130

Date of Report: June 7, 2007
 Samples Submitted: June 1, 2007
 Laboratory Reference: 0706-002
 Project: 650-001

**HALOGENATED VOLATILES by EPA 8260B
 METHOD BLANK QUALITY CONTROL**

page 1 of 2

Date Extracted: 6-1-07
 Date Analyzed: 6-1-07
 Matrix: Soil
 Units: mg/kg (ppm)
 Lab ID: MB0601S1

Compound	Results	Flags	PQL
Dichlorodifluoromethane	ND		0.0010
Chloromethane	ND		0.0010
Vinyl Chloride	ND		0.0010
Bromomethane	ND		0.0050
Chloroethane	ND		0.0010
Trichlorofluoromethane	ND		0.0010
1,1-Dichloroethene	ND		0.0010
Iodomethane	ND		0.0050
Methylene Chloride	ND		0.0050
(trans) 1,2-Dichloroethene	ND		0.0010
1,1-Dichloroethane	ND		0.0010
2,2-Dichloropropane	ND		0.0010
(cis) 1,2-Dichloroethene	ND		0.0010
Bromochloromethane	ND		0.0010
Chloroform	ND		0.0010
1,1,1-Trichloroethane	ND		0.0010
Carbon Tetrachloride	ND		0.0010
1,1-Dichloropropene	ND		0.0010
1,2-Dichloroethane	ND		0.0010
Trichloroethene	ND		0.0010
1,2-Dichloropropane	ND		0.0010
Dibromomethane	ND		0.0010
Bromodichloromethane	ND		0.0010
2-Chloroethyl Vinyl Ether	ND		0.0050
(cis) 1,3-Dichloropropene	ND		0.0010
(trans) 1,3-Dichloropropene	ND		0.0010

Date of Report: June 7, 2007
 Samples Submitted: June 1, 2007
 Laboratory Reference: 0706-002
 Project: 650-001

HALOGENATED VOLATILES by EPA 8260B
METHOD BLANK QUALITY CONTROL
 page 2 of 2

Lab ID: MB0601S1

Compound	Results	Flags	PQL
1,1,2-Trichloroethane	ND		0.0010
Tetrachloroethene	ND		0.0010
1,3-Dichloropropane	ND		0.0010
Dibromochloromethane	ND		0.0010
1,2-Dibromoethane	ND		0.0010
Chlorobenzene	ND		0.0010
1,1,1,2-Tetrachloroethane	ND		0.0010
Bromoform	ND		0.0010
Bromobenzene	ND		0.0010
1,1,1,2-Tetrachloroethane	ND		0.0010
1,2,3-Trichloropropane	ND		0.0010
2-Chlorotoluene	ND		0.0010
4-Chlorotoluene	ND		0.0010
1,3-Dichlorobenzene	ND		0.0010
1,4-Dichlorobenzene	ND		0.0010
1,2-Dichlorobenzene	ND		0.0010
1,2-Dibromo-3-chloropropane	ND		0.0050
1,2,4-Trichlorobenzene	ND		0.0010
Hexachlorobutadiene	ND		0.0050
1,2,3-Trichlorobenzene	ND		0.0010

Surrogate	Percent Recovery	Control Limits
Dibromofluoromethane	83	70-118
Toluene, d8	84	70-121
4-Bromofluorobenzene	98	70-130

Date of Report: June 7, 2007
 Samples Submitted: June 1, 2007
 Laboratory Reference: 0706-002
 Project: 650-001

**HALOGENATED VOLATILES by EPA 8260B
 SB/SBD QUALITY CONTROL**

Date Extracted: 6-1-07
 Date Analyzed: 6-1-07

Matrix: Soil
 Units: mg/kg (ppm)

Lab ID: SB0601S1

Compound	Spike Amount	SB	Percent Recovery	SBD	Percent Recovery	Recovery Limits	Flags
1,1-Dichloroethene	0.0500	0.0521	104	0.0543	109	70-130	
Benzene	0.0500	0.0547	109	0.0519	104	70-127	
Trichloroethene	0.0500	0.0553	111	0.0513	103	73-117	
Toluene	0.0500	0.0520	104	0.0560	112	78-115	
Chlorobenzene	0.0500	0.0509	102	0.0506	101	80-117	

	RPD	RPD Limit	Flags
1,1-Dichloroethene	4	10	
Benzene	5	11	
Trichloroethene	7	13	
Toluene	7	12	
Chlorobenzene	1	10	

Date of Report: June 7, 2007
Samples Submitted: June 1, 2007
Laboratory Reference: 0706-002
Project: 650-001

% MOISTURE

Date Analyzed: 6-1-07

Client ID	Lab ID	% Moisture
FB1-1	06-002-01	6
FB1-6	06-002-02	5
FB1-10	06-002-03	4
FB2-1	06-002-04	4



Data Qualifiers and Abbreviations

A - Due to a high sample concentration, the amount spiked is insufficient for meaningful MS/MSD recovery data.

B - The analyte indicated was also found in the blank sample.

C - The duplicate RPD is outside control limits due to high result variability when analyte concentrations are within five times the quantitation limit.

E - The value reported exceeds the quantitation range and is an estimate.

F - Surrogate recovery data is not available due to the high concentration of coeluting target compounds.

H - The analyte indicated is a common laboratory solvent and may have been introduced during sample preparation, and be impacting the sample result.

I - Compound recovery is outside of the control limits.

J - The value reported was below the practical quantitation limit. The value is an estimate.

K - Sample duplicate RPD is outside control limits due to sample inhomogeneity. The sample was re-extracted and re-analyzed with similar results.

L - The RPD is outside of the control limits.

M - Hydrocarbons in the gasoline range are impacting the diesel range result.

M1 - Hydrocarbons in the gasoline range (toluene-naphthalene) are present in the sample.

N - Hydrocarbons in the lube oil range are impacting the diesel range result.

O - Hydrocarbons indicative of heavier fuels are present in the sample and are impacting the gasoline result.

P - The RPD of the detected concentrations between the two columns is greater than 40.

Q - Surrogate recovery is outside of the control limits.

S - Surrogate recovery data is not available due to the necessary dilution of the sample.

T - The sample chromatogram is not similar to a typical _____.

U - The analyte was analyzed for, but was not detected above the reported sample quantitation limit.

U1 - The practical quantitation limit is elevated due to interferences present in the sample.

V - Matrix Spike/Matrix Spike Duplicate recoveries are outside control limits due to matrix effects.

W - Matrix Spike/Matrix Spike Duplicate RPD are outside control limits due to matrix effects.

X - Sample extract treated with a mercury cleanup procedure.

Y - Sample extract treated with an acid/silica gel cleanup procedure.

Z -

ND - Not Detected at PQL

PQL - Practical Quantitation Limit

RPD - Relative Percent Difference



OnSite Environmental Inc.
 14648 NE 95th Street • Redmond, WA 98052
 Phone: (425) 883-3881 • Fax: (425) 885-4603

Chain of Custody

Company: Farellon Consulting
 Project Number: 650-001
 Project Name: Cleaning Ctr. of Redmont
 Project Manager: Jennifer Cye
 Sampled by: J. Cye

Turnaround Request (in working days)
 (Check One)
 Same Day 1 Day
 2 Day 3 Day
 Standard (7 working days)
 (TPH analysis 5 working days)

 (other)

Laboratory Number: 06-002

Requested Analysis

Lab ID	Sample Identification	Date Sampled	Time Sampled	Matrix	# of Cont.	NWTPH-HCID	NWTPH-Gx/BTEX	NWTPH-Dx	Volatiles by 8260B	Halogenated Volatiles by 8260B	Semivolatiles by 8270C	PAHs by 8270C / SIM	PCBs by 8082	Pesticides by 8081A	Herbicides by 8151A	Total RCRA Metals (6)	TCLP Metals	HEM by 1664	VPH	EPH	% Moisture	
1	FBI-1	6-1-07	1235	S	4					X												X
2	FBI-6		0115							X												X
3	FBI-10		0155							X												X
4	FB2-1		0210							X												X
5 6-1-07																						

Signature	Company	Date	Time	Comments/Special Instructions:
<u>[Signature]</u>	<u>Farellon Consulting</u>	<u>6-1-07</u>	<u>0807</u>	
<u>[Signature]</u>	<u>OSE</u>	<u>6/1/07</u>	<u>0807</u>	
Relinquished by				
Received by				
Relinquished by				
Received by				
Reviewed by/Date	Reviewed by/Date	Chromatograms with final report <input type="checkbox"/>		



14648 NE 95th Street, Redmond, WA 98052 • (425) 883-3881

June 20, 2007

Jennifer Cyr
Farallon Consulting, LLC
975 5th Avenue NW
Issaquah, WA 98027

Re: Analytical Data for Project 650-001
Laboratory Reference No. 0706-103

Dear Jennifer:

Enclosed are the analytical results and associated quality control data for samples submitted on June 12, 2007.

The standard policy of OnSite Environmental Inc. is to store your samples for 30 days from the date of receipt. If you require longer storage, please contact the laboratory.

We appreciate the opportunity to be of service to you on this project. If you have any questions concerning the data, or need additional information, please feel free to call me.

Sincerely,

A handwritten signature in black ink, appearing to read 'DB', with a horizontal line extending to the right.

David Baumeister
Project Manager

Enclosures

Date of Report: June 20, 2007
Samples Submitted: June 12, 2007
Laboratory Reference: 0706-103
Project: 650-001

Case Narrative

Samples were collected on June 12, 2007 and received by the laboratory on June 12, 2007. They were maintained at the laboratory at a temperature of 2°C to 6°C except as noted below.

General QA/QC issues associated with the analytical data enclosed in this laboratory report will be indicated with a reference to a comment or explanation on the Data Qualifier page. More complex and involved QA/QC issues will be discussed in detail below.

Halogenated Volatiles EPA 8260B Analysis

Per EPA Method 5035A, samples were received by the laboratory in pre-weighed 40 mL VOA vials within 48 hours of sample collection. They were stored in a freezer at between -7°C and -20°C until extraction or analysis.

Any other QA/QC issues associated with this extraction and analysis will be indicated with a footnote reference and discussed in detail on the Data Qualifier page.

Date of Report: June 20, 2007
 Samples Submitted: June 12, 2007
 Laboratory Reference: 0706-103
 Project: 650-001

HALOGENATED VOLATILES by EPA 8260B
 page 1 of 2

Date Extracted: 6-13-07
 Date Analyzed: 6-13-07
 Matrix: Soil
 Units: mg/kg (ppm)
 Lab ID: 06-103-01
 Client ID: FB3-1

Compound	Results	Flags	PQL
Dichlorodifluoromethane	ND		0.00091
Chloromethane	ND		0.00091
Vinyl Chloride	ND		0.00091
Bromomethane	ND		0.0045
Chloroethane	ND		0.00091
Trichlorofluoromethane	ND		0.00091
1,1-Dichloroethene	ND		0.00091
Iodomethane	ND		0.0045
Methylene Chloride	0.010	H	0.0091
(trans) 1,2-Dichloroethene	ND		0.00091
1,1-Dichloroethane	ND		0.00091
2,2-Dichloropropane	ND		0.00091
(cis) 1,2-Dichloroethene	ND		0.00091
Bromochloromethane	ND		0.00091
Chloroform	ND		0.00091
1,1,1-Trichloroethane	ND		0.00091
Carbon Tetrachloride	ND		0.00091
1,1-Dichloropropene	ND		0.00091
1,2-Dichloroethane	ND		0.00091
Trichloroethene	ND		0.00091
1,2-Dichloropropane	ND		0.00091
Dibromomethane	ND		0.00091
Bromodichloromethane	ND		0.00091
2-Chloroethyl Vinyl Ether	ND		0.0045
(cis) 1,3-Dichloropropene	ND		0.00091
(trans) 1,3-Dichloropropene	ND		0.00091

Date of Report: June 20, 2007
 Samples Submitted: June 12, 2007
 Laboratory Reference: 0706-103
 Project: 650-001

HALOGENATED VOLATILES by EPA 8260B
 page 2 of 2

Lab ID: 06-103-01
 Client ID: FB3-1

Compound	Results	Flags	PQL
1,1,2-Trichloroethane	ND		0.00091
Tetrachloroethene	0.0020		0.00091
1,3-Dichloropropane	ND		0.00091
Dibromochloromethane	ND		0.00091
1,2-Dibromoethane	ND		0.00091
Chlorobenzene	ND		0.00091
1,1,1,2-Tetrachloroethane	ND		0.00091
Bromoform	ND		0.00091
Bromobenzene	ND		0.00091
1,1,2,2-Tetrachloroethane	ND		0.00091
1,2,3-Trichloropropane	ND		0.00091
2-Chlorotoluene	ND		0.00091
4-Chlorotoluene	ND		0.00091
1,3-Dichlorobenzene	ND		0.00091
1,4-Dichlorobenzene	ND		0.00091
1,2-Dichlorobenzene	ND		0.00091
1,2-Dibromo-3-chloropropane	ND		0.0045
1,2,4-Trichlorobenzene	ND		0.00091
Hexachlorobutadiene	ND		0.0045
1,2,3-Trichlorobenzene	ND		0.00091

Surrogate	Percent Recovery	Control Limits
Dibromofluoromethane	83	70-118
Toluene, d8	86	70-121
4-Bromofluorobenzene	94	70-130

Date of Report: June 20, 2007
 Samples Submitted: June 12, 2007
 Laboratory Reference: 0706-103
 Project: 650-001

HALOGENATED VOLATILES by EPA 8260B
 page 1 of 2

Date Extracted: 6-14-07
 Date Analyzed: 6-14-07
 Matrix: Soil
 Units: mg/kg (ppm)
 Lab ID: 06-103-02
 Client ID: FB3-6

Compound	Results	Flags	PQL
Dichlorodifluoromethane	ND		0.0014
Chloromethane	ND		0.0014
Vinyl Chloride	ND		0.0014
Bromomethane	ND		0.0069
Chloroethane	ND		0.0014
Trichlorofluoromethane	ND		0.0014
1,1-Dichloroethene	ND		0.0014
Iodomethane	ND		0.0069
Methylene Chloride	0.015	H	0.014
(trans) 1,2-Dichloroethene	0.0028		0.0014
1,1-Dichloroethane	ND		0.0014
2,2-Dichloropropane	ND		0.0014
(cis) 1,2-Dichloroethene	0.043		0.0014
Bromochloromethane	ND		0.0014
Chloroform	ND		0.0014
1,1,1-Trichloroethane	ND		0.0014
Carbon Tetrachloride	ND		0.0014
1,1-Dichloropropene	ND		0.0014
1,2-Dichloroethane	ND		0.0014
Trichloroethene	ND		0.0014
1,2-Dichloropropane	ND		0.0014
Dibromomethane	ND		0.0014
Bromodichloromethane	ND		0.0014
2-Chloroethyl Vinyl Ether	ND		0.0069
(cis) 1,3-Dichloropropene	ND		0.0014
(trans) 1,3-Dichloropropene	ND		0.0014

Date of Report: June 20, 2007
 Samples Submitted: June 12, 2007
 Laboratory Reference: 0706-103
 Project: 650-001

HALOGENATED VOLATILES by EPA 8260B
 page 2 of 2

Lab ID: 06-103-02
 Client ID: FB3-6

Compound	Results	Flags	PQL
1,1,2-Trichloroethane	ND		0.0014
Tetrachloroethene	0.0054		0.0014
1,3-Dichloropropane	ND		0.0014
Dibromochloromethane	ND		0.0014
1,2-Dibromoethane	ND		0.0014
Chlorobenzene	ND		0.0014
1,1,1,2-Tetrachloroethane	ND		0.0014
Bromoform	ND		0.0014
Bromobenzene	ND		0.0014
1,1,1,2-Tetrachloroethane	ND		0.0014
1,2,3-Trichloropropane	ND		0.0014
2-Chlorotoluene	ND		0.0014
4-Chlorotoluene	ND		0.0014
1,3-Dichlorobenzene	ND		0.0014
1,4-Dichlorobenzene	ND		0.0014
1,2-Dichlorobenzene	ND		0.0014
1,2-Dibromo-3-chloropropane	ND		0.0069
1,2,4-Trichlorobenzene	ND		0.0014
Hexachlorobutadiene	ND		0.0069
1,2,3-Trichlorobenzene	ND		0.0014

Surrogate	Percent Recovery	Control Limits
Dibromofluoromethane	88	70-118
Toluene, d8	77	70-121
4-Bromofluorobenzene	82	70-130

Date of Report: June 20, 2007
 Samples Submitted: June 12, 2007
 Laboratory Reference: 0706-103
 Project: 650-001

HALOGENATED VOLATILES by EPA 8260B
 page 1 of 2

Date Extracted: 6-14-07
 Date Analyzed: 6-14-07
 Matrix: Soil
 Units: mg/kg (ppm)
 Lab ID: 06-103-03
 Client ID: FB3-9

Compound	Results	Flags	PQL
Dichlorodifluoromethane	ND		0.0010
Chloromethane	ND		0.0010
Vinyl Chloride	ND		0.0010
Bromomethane	ND		0.0052
Chloroethane	ND		0.0010
Trichlorofluoromethane	ND		0.0010
1,1-Dichloroethene	ND		0.0010
Iodomethane	ND		0.0052
Methylene Chloride	ND		0.010
(trans) 1,2-Dichloroethene	ND		0.0010
1,1-Dichloroethane	ND		0.0010
2,2-Dichloropropane	ND		0.0010
(cis) 1,2-Dichloroethene	0.0017		0.0010
Bromochloromethane	ND		0.0010
Chloroform	ND		0.0010
1,1,1-Trichloroethane	ND		0.0010
Carbon Tetrachloride	ND		0.0010
1,1-Dichloropropene	ND		0.0010
1,2-Dichloroethane	ND		0.0010
Trichloroethene	ND		0.0010
1,2-Dichloropropane	ND		0.0010
Dibromomethane	ND		0.0010
Bromodichloromethane	ND		0.0010
2-Chloroethyl Vinyl Ether	ND		0.0052
(cis) 1,3-Dichloropropene	ND		0.0010
(trans) 1,3-Dichloropropene	ND		0.0010

Date of Report: June 20, 2007
 Samples Submitted: June 12, 2007
 Laboratory Reference: 0706-103
 Project: 650-001

HALOGENATED VOLATILES by EPA 8260B
 page 2 of 2

Lab ID: 06-103-03
 Client ID: FB3-9

Compound	Results	Flags	PQL
1,1,2-Trichloroethane	ND		0.0010
Tetrachloroethene	0.020		0.0010
1,3-Dichloropropane	ND		0.0010
Dibromochloromethane	ND		0.0010
1,2-Dibromoethane	ND		0.0010
Chlorobenzene	ND		0.0010
1,1,1,2-Tetrachloroethane	ND		0.0010
Bromoform	ND		0.0010
Bromobenzene	ND		0.0010
1,1,2,2-Tetrachloroethane	ND		0.0010
1,2,3-Trichloropropane	ND		0.0010
2-Chlorotoluene	ND		0.0010
4-Chlorotoluene	ND		0.0010
1,3-Dichlorobenzene	ND		0.0010
1,4-Dichlorobenzene	ND		0.0010
1,2-Dichlorobenzene	ND		0.0010
1,2-Dibromo-3-chloropropane	ND		0.0052
1,2,4-Trichlorobenzene	ND		0.0010
Hexachlorobutadiene	ND		0.0052
1,2,3-Trichlorobenzene	ND		0.0010

Surrogate	Percent Recovery	Control Limits
Dibromofluoromethane	87	70-118
Toluene, d8	80	70-121
4-Bromofluorobenzene	87	70-130

Date of Report: June 20, 2007
 Samples Submitted: June 12, 2007
 Laboratory Reference: 0706-103
 Project: 650-001

HALOGENATED VOLATILES by EPA 8260B
 page 1 of 2

Date Extracted: 6-13-07
 Date Analyzed: 6-13-07
 Matrix: Soil
 Units: mg/kg (ppm)
 Lab ID: 06-103-04
 Client ID: FB4-0.5

Compound	Results	Flags	PQL
Dichlorodifluoromethane	ND		0.0010
Chloromethane	ND		0.0010
Vinyl Chloride	ND		0.0010
Bromomethane	ND		0.0051
Chloroethane	ND		0.0010
Trichlorofluoromethane	ND		0.0010
1,1-Dichloroethene	ND		0.0010
Iodomethane	ND		0.0051
Methylene Chloride	0.038	H	0.010
(trans) 1,2-Dichloroethene	ND		0.0010
1,1-Dichloroethane	ND		0.0010
2,2-Dichloropropane	ND		0.0010
(cis) 1,2-Dichloroethene	ND		0.0010
Bromochloromethane	ND		0.0010
Chloroform	ND		0.0010
1,1,1-Trichloroethane	ND		0.0010
Carbon Tetrachloride	ND		0.0010
1,1-Dichloropropene	ND		0.0010
1,2-Dichloroethane	ND		0.0010
Trichloroethene	ND		0.0010
1,2-Dichloropropane	ND		0.0010
Dibromomethane	ND		0.0010
Bromodichloromethane	ND		0.0010
2-Chloroethyl Vinyl Ether	ND		0.0051
(cis) 1,3-Dichloropropene	ND		0.0010
(trans) 1,3-Dichloropropene	ND		0.0010

Date of Report: June 20, 2007
 Samples Submitted: June 12, 2007
 Laboratory Reference: 0706-103
 Project: 650-001

HALOGENATED VOLATILES by EPA 8260B
 page 2 of 2

Lab ID: 06-103-04
 Client ID: FB4-0.5

Compound	Results	Flags	PQL
1,1,2-Trichloroethane	ND		0.0010
Tetrachloroethene	0.0041		0.0010
1,3-Dichloropropane	ND		0.0010
Dibromochloromethane	ND		0.0010
1,2-Dibromoethane	ND		0.0010
Chlorobenzene	ND		0.0010
1,1,1,2-Tetrachloroethane	ND		0.0010
Bromoform	ND		0.0010
Bromobenzene	ND		0.0010
1,1,2,2-Tetrachloroethane	ND		0.0010
1,2,3-Trichloropropane	ND		0.0010
2-Chlorotoluene	ND		0.0010
4-Chlorotoluene	ND		0.0010
1,3-Dichlorobenzene	ND		0.0010
1,4-Dichlorobenzene	ND		0.0010
1,2-Dichlorobenzene	ND		0.0010
1,2-Dibromo-3-chloropropane	ND		0.0051
1,2,4-Trichlorobenzene	ND		0.0010
Hexachlorobutadiene	ND		0.0051
1,2,3-Trichlorobenzene	ND		0.0010

Surrogate	Percent Recovery	Control Limits
Dibromofluoromethane	84	70-118
Toluene, d8	84	70-121
4-Bromofluorobenzene	101	70-130

Date of Report: June 20, 2007
 Samples Submitted: June 12, 2007
 Laboratory Reference: 0706-103
 Project: 650-001

HALOGENATED VOLATILES by EPA 8260B
 page 1 of 2

Date Extracted: 6-13-07
 Date Analyzed: 6-13-07
 Matrix: Soil
 Units: mg/kg (ppm)
 Lab ID: 06-103-05
 Client ID: FB4-5

Compound	Results	Flags	PQL
Dichlorodifluoromethane	ND		0.00096
Chloromethane	ND		0.00096
Vinyl Chloride	ND		0.00096
Bromomethane	ND		0.0048
Chloroethane	ND		0.00096
Trichlorofluoromethane	ND		0.00096
1,1-Dichloroethene	ND		0.00096
Iodomethane	ND		0.0048
Methylene Chloride	0.011	H	0.0096
(trans) 1,2-Dichloroethene	ND		0.00096
1,1-Dichloroethane	ND		0.00096
2,2-Dichloropropane	ND		0.00096
(cis) 1,2-Dichloroethene	ND		0.00096
Bromochloromethane	ND		0.00096
Chloroform	ND		0.00096
1,1,1-Trichloroethane	ND		0.00096
Carbon Tetrachloride	ND		0.00096
1,1-Dichloropropene	ND		0.00096
1,2-Dichloroethane	ND		0.00096
Trichloroethene	ND		0.00096
1,2-Dichloropropane	ND		0.00096
Dibromomethane	ND		0.00096
Bromodichloromethane	ND		0.00096
2-Chloroethyl Vinyl Ether	ND		0.0048
(cis) 1,3-Dichloropropene	ND		0.00096
(trans) 1,3-Dichloropropene	ND		0.00096

Date of Report: June 20, 2007
 Samples Submitted: June 12, 2007
 Laboratory Reference: 0706-103
 Project: 650-001

HALOGENATED VOLATILES by EPA 8260B
 page 2 of 2

Lab ID: 06-103-05
 Client ID: FB4-5

Compound	Results	Flags	PQL
1,1,2-Trichloroethane	ND		0.00096
Tetrachloroethene	0.0061		0.00096
1,3-Dichloropropane	ND		0.00096
Dibromochloromethane	ND		0.00096
1,2-Dibromoethane	ND		0.00096
Chlorobenzene	ND		0.00096
1,1,1,2-Tetrachloroethane	ND		0.00096
Bromoform	ND		0.00096
Bromobenzene	ND		0.00096
1,1,1,2-Tetrachloroethane	ND		0.00096
1,2,3-Trichloropropane	ND		0.00096
2-Chlorotoluene	ND		0.00096
4-Chlorotoluene	ND		0.00096
1,3-Dichlorobenzene	ND		0.00096
1,4-Dichlorobenzene	ND		0.00096
1,2-Dichlorobenzene	ND		0.00096
1,2-Dibromo-3-chloropropane	ND		0.0048
1,2,4-Trichlorobenzene	ND		0.00096
Hexachlorobutadiene	ND		0.0048
1,2,3-Trichlorobenzene	ND		0.00096

Surrogate	Percent Recovery	Control Limits
Dibromofluoromethane	85	70-118
Toluene, d8	88	70-121
4-Bromofluorobenzene	91	70-130

Date of Report: June 20, 2007
 Samples Submitted: June 12, 2007
 Laboratory Reference: 0706-103
 Project: 650-001

HALOGENATED VOLATILES by EPA 8260B
 page 1 of 2

Date Extracted: 6-14-07
 Date Analyzed: 6-14-07
 Matrix: Soil
 Units: mg/kg (ppm)
 Lab ID: 06-103-06
 Client ID: FB4-9

Compound	Results	Flags	PQL
Dichlorodifluoromethane	ND		0.0013
Chloromethane	ND		0.0013
Vinyl Chloride	ND		0.0013
Bromomethane	ND		0.0067
Chloroethane	ND		0.0013
Trichlorofluoromethane	ND		0.0013
1,1-Dichloroethene	ND		0.0013
Iodomethane	ND		0.0067
Methylene Chloride	0.039	H	0.013
(trans) 1,2-Dichloroethene	ND		0.0013
1,1-Dichloroethane	ND		0.0013
2,2-Dichloropropane	ND		0.0013
(cis) 1,2-Dichloroethene	ND		0.0013
Bromochloromethane	ND		0.0013
Chloroform	ND		0.0013
1,1,1-Trichloroethane	ND		0.0013
Carbon Tetrachloride	ND		0.0013
1,1-Dichloropropene	ND		0.0013
1,2-Dichloroethane	ND		0.0013
Trichloroethene	ND		0.0013
1,2-Dichloropropane	ND		0.0013
Dibromomethane	ND		0.0013
Bromodichloromethane	ND		0.0013
2-Chloroethyl Vinyl Ether	ND		0.0067
(cis) 1,3-Dichloropropene	ND		0.0013
(trans) 1,3-Dichloropropene	ND		0.0013

Date of Report: June 20, 2007
 Samples Submitted: June 12, 2007
 Laboratory Reference: 0706-103
 Project: 650-001

HALOGENATED VOLATILES by EPA 8260B
 page 2 of 2

Lab ID: 06-103-06
 Client ID: FB4-9

Compound	Results	Flags	PQL
1,1,2-Trichloroethane	ND		0.0013
Tetrachloroethene	0.0026		0.0013
1,3-Dichloropropane	ND		0.0013
Dibromochloromethane	ND		0.0013
1,2-Dibromoethane	ND		0.0013
Chlorobenzene	ND		0.0013
1,1,1,2-Tetrachloroethane	ND		0.0013
Bromoform	ND		0.0013
Bromobenzene	ND		0.0013
1,1,2,2-Tetrachloroethane	ND		0.0013
1,2,3-Trichloropropane	ND		0.0013
2-Chlorotoluene	ND		0.0013
4-Chlorotoluene	ND		0.0013
1,3-Dichlorobenzene	ND		0.0013
1,4-Dichlorobenzene	ND		0.0013
1,2-Dichlorobenzene	ND		0.0013
1,2-Dibromo-3-chloropropane	ND		0.0067
1,2,4-Trichlorobenzene	ND		0.0013
Hexachlorobutadiene	ND		0.0067
1,2,3-Trichlorobenzene	ND		0.0013

Surrogate	Percent Recovery	Control Limits
Dibromofluoromethane	84	70-118
Toluene, d8	87	70-121
4-Bromofluorobenzene	96	70-130

Date of Report: June 20, 2007
 Samples Submitted: June 12, 2007
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HALOGENATED VOLATILES by EPA 8260B
 page 1 of 2

Date Extracted: 6-13-07
 Date Analyzed: 6-13-07
 Matrix: Soil
 Units: mg/kg (ppm)
 Lab ID: 06-103-07
 Client ID: FB5-0.5

Compound	Results	Flags	PQL
Dichlorodifluoromethane	ND		0.00099
Chloromethane	ND		0.00099
Vinyl Chloride	ND		0.00099
Bromomethane	ND		0.0050
Chloroethane	ND		0.00099
Trichlorofluoromethane	ND		0.00099
1,1-Dichloroethene	ND		0.00099
Iodomethane	ND		0.0050
Methylene Chloride	0.014	H	0.0099
(trans) 1,2-Dichloroethene	ND		0.00099
1,1-Dichloroethane	ND		0.00099
2,2-Dichloropropane	ND		0.00099
(cis) 1,2-Dichloroethene	ND		0.00099
Bromochloromethane	ND		0.00099
Chloroform	ND		0.00099
1,1,1-Trichloroethane	ND		0.00099
Carbon Tetrachloride	ND		0.00099
1,1-Dichloropropene	ND		0.00099
1,2-Dichloroethane	ND		0.00099
Trichloroethene	ND		0.00099
1,2-Dichloropropane	ND		0.00099
Dibromomethane	ND		0.00099
Bromodichloromethane	ND		0.00099
2-Chloroethyl Vinyl Ether	ND		0.0050
(cis) 1,3-Dichloropropene	ND		0.00099
(trans) 1,3-Dichloropropene	ND		0.00099

Date of Report: June 20, 2007
 Samples Submitted: June 12, 2007
 Laboratory Reference: 0706-103
 Project: 650-001

HALOGENATED VOLATILES by EPA 8260B
 page 2 of 2

Lab ID: 06-103-07
 Client ID: FB5-0.5

Compound	Results	Flags	PQL
1,1,2-Trichloroethane	ND		0.00099
Tetrachloroethene	ND		0.00099
1,3-Dichloropropane	ND		0.00099
Dibromochloromethane	ND		0.00099
1,2-Dibromoethane	ND		0.00099
Chlorobenzene	ND		0.00099
1,1,1,2-Tetrachloroethane	ND		0.00099
Bromoform	ND		0.00099
Bromobenzene	ND		0.00099
1,1,2,2-Tetrachloroethane	ND		0.00099
1,2,3-Trichloropropane	ND		0.00099
2-Chlorotoluene	ND		0.00099
4-Chlorotoluene	ND		0.00099
1,3-Dichlorobenzene	ND		0.00099
1,4-Dichlorobenzene	ND		0.00099
1,2-Dichlorobenzene	ND		0.00099
1,2-Dibromo-3-chloropropane	ND		0.0050
1,2,4-Trichlorobenzene	ND		0.00099
Hexachlorobutadiene	ND		0.0050
1,2,3-Trichlorobenzene	ND		0.00099

Surrogate	Percent Recovery	Control Limits
Dibromofluoromethane	83	70-118
Toluene, d8	80	70-121
4-Bromofluorobenzene	86	70-130

Date of Report: June 20, 2007
 Samples Submitted: June 12, 2007
 Laboratory Reference: 0706-103
 Project: 650-001

HALOGENATED VOLATILES by EPA 8260B
 page 1 of 2

Date Extracted: 6-13-07
 Date Analyzed: 6-13-07
 Matrix: Soil
 Units: mg/kg (ppm)
 Lab ID: 06-103-08
 Client ID: FB5-3

Compound	Results	Flags	PQL
Dichlorodifluoromethane	ND		0.00081
Chloromethane	ND		0.00081
Vinyl Chloride	ND		0.00081
Bromomethane	ND		0.0040
Chloroethane	ND		0.00081
Trichlorofluoromethane	ND		0.00081
1,1-Dichloroethene	ND		0.00081
Iodomethane	ND		0.0040
Methylene Chloride	0.010	H	0.0081
(trans) 1,2-Dichloroethene	ND		0.00081
1,1-Dichloroethane	ND		0.00081
2,2-Dichloropropane	ND		0.00081
(cis) 1,2-Dichloroethene	ND		0.00081
Bromochloromethane	ND		0.00081
Chloroform	ND		0.00081
1,1,1-Trichloroethane	ND		0.00081
Carbon Tetrachloride	ND		0.00081
1,1-Dichloropropene	ND		0.00081
1,2-Dichloroethane	ND		0.00081
Trichloroethene	ND		0.00081
1,2-Dichloropropane	ND		0.00081
Dibromomethane	ND		0.00081
Bromodichloromethane	ND		0.00081
2-Chloroethyl Vinyl Ether	ND		0.0040
(cis) 1,3-Dichloropropene	ND		0.00081
(trans) 1,3-Dichloropropene	ND		0.00081

Date of Report: June 20, 2007
 Samples Submitted: June 12, 2007
 Laboratory Reference: 0706-103
 Project: 650-001

HALOGENATED VOLATILES by EPA 8260B
 page 2 of 2

Lab ID: 06-103-08
 Client ID: FB5-3

Compound	Results	Flags	PQL
1,1,2-Trichloroethane	ND		0.00081
Tetrachloroethene	0.021		0.00081
1,3-Dichloropropane	ND		0.00081
Dibromochloromethane	ND		0.00081
1,2-Dibromoethane	ND		0.00081
Chlorobenzene	ND		0.00081
1,1,1,2-Tetrachloroethane	ND		0.00081
Bromoform	ND		0.00081
Bromobenzene	ND		0.00081
1,1,2,2-Tetrachloroethane	ND		0.00081
1,2,3-Trichloropropane	ND		0.00081
2-Chlorotoluene	ND		0.00081
4-Chlorotoluene	ND		0.00081
1,3-Dichlorobenzene	ND		0.00081
1,4-Dichlorobenzene	ND		0.00081
1,2-Dichlorobenzene	ND		0.00081
1,2-Dibromo-3-chloropropane	ND		0.0040
1,2,4-Trichlorobenzene	ND		0.00081
Hexachlorobutadiene	ND		0.0040
1,2,3-Trichlorobenzene	ND		0.00081

Surrogate	Percent Recovery	Control Limits
Dibromofluoromethane	83	70-118
Toluene, d8	74	70-121
4-Bromofluorobenzene	79	70-130

Date of Report: June 20, 2007
 Samples Submitted: June 12, 2007
 Laboratory Reference: 0706-103
 Project: 650-001

HALOGENATED VOLATILES by EPA 8260B
 page 1 of 2

Date Extracted: 6-14-07
 Date Analyzed: 6-14-07
 Matrix: Soil
 Units: mg/kg (ppm)
 Lab ID: 06-103-09
 Client ID: FB5-5

Compound	Results	Flags	PQL
Dichlorodifluoromethane	ND		0.00094
Chloromethane	ND		0.00094
Vinyl Chloride	ND		0.00094
Bromomethane	ND		0.0047
Chloroethane	ND		0.00094
Trichlorofluoromethane	ND		0.00094
1,1-Dichloroethene	ND		0.00094
Iodomethane	ND		0.0047
Methylene Chloride	0.012	H	0.0094
(trans) 1,2-Dichloroethene	ND		0.00094
1,1-Dichloroethane	ND		0.00094
2,2-Dichloropropane	ND		0.00094
(cis) 1,2-Dichloroethene	ND		0.00094
Bromochloromethane	ND		0.00094
Chloroform	ND		0.00094
1,1,1-Trichloroethane	ND		0.00094
Carbon Tetrachloride	ND		0.00094
1,1-Dichloropropene	ND		0.00094
1,2-Dichloroethane	ND		0.00094
Trichloroethene	ND		0.00094
1,2-Dichloropropane	ND		0.00094
Dibromomethane	ND		0.00094
Bromodichloromethane	ND		0.00094
2-Chloroethyl Vinyl Ether	ND		0.0047
(cis) 1,3-Dichloropropene	ND		0.00094
(trans) 1,3-Dichloropropene	ND		0.00094

Date of Report: June 20, 2007
 Samples Submitted: June 12, 2007
 Laboratory Reference: 0706-103
 Project: 650-001

HALOGENATED VOLATILES by EPA 8260B
 page 2 of 2

Lab ID: 06-103-09
 Client ID: FB5-5

Compound	Results	Flags	PQL
1,1,2-Trichloroethane	ND		0.00094
Tetrachloroethene	0.018		0.00094
1,3-Dichloropropane	ND		0.00094
Dibromochloromethane	ND		0.00094
1,2-Dibromoethane	ND		0.00094
Chlorobenzene	ND		0.00094
1,1,1,2-Tetrachloroethane	ND		0.00094
Bromoform	ND		0.00094
Bromobenzene	ND		0.00094
1,1,2,2-Tetrachloroethane	ND		0.00094
1,2,3-Trichloropropane	ND		0.00094
2-Chlorotoluene	ND		0.00094
4-Chlorotoluene	ND		0.00094
1,3-Dichlorobenzene	ND		0.00094
1,4-Dichlorobenzene	ND		0.00094
1,2-Dichlorobenzene	ND		0.00094
1,2-Dibromo-3-chloropropane	ND		0.0047
1,2,4-Trichlorobenzene	ND		0.00094
Hexachlorobutadiene	ND		0.0047
1,2,3-Trichlorobenzene	ND		0.00094

Surrogate	Percent Recovery	Control Limits
Dibromofluoromethane	90	70-118
Toluene, d8	80	70-121
4-Bromofluorobenzene	90	70-130

Date of Report: June 20, 2007
 Samples Submitted: June 12, 2007
 Laboratory Reference: 0706-103
 Project: 650-001

**HALOGENATED VOLATILES by EPA 8260B
 METHOD BLANK QUALITY CONTROL**

page 1 of 2

Date Extracted: 6-13-07
 Date Analyzed: 6-13-07
 Matrix: Soil
 Units: mg/kg (ppm)
 Lab ID: MB0613S1

Compound	Results	Flags	PQL
Dichlorodifluoromethane	ND		0.0010
Chloromethane	ND		0.0010
Vinyl Chloride	ND		0.0010
Bromomethane	ND		0.0050
Chloroethane	ND		0.0010
Trichlorofluoromethane	ND		0.0010
1,1-Dichloroethene	ND		0.0010
Iodomethane	ND		0.0050
Methylene Chloride	ND		0.010
(trans) 1,2-Dichloroethene	ND		0.0010
1,1-Dichloroethane	ND		0.0010
2,2-Dichloropropane	ND		0.0010
(cis) 1,2-Dichloroethene	ND		0.0010
Bromochloromethane	ND		0.0010
Chloroform	ND		0.0010
1,1,1-Trichloroethane	ND		0.0010
Carbon Tetrachloride	ND		0.0010
1,1-Dichloropropene	ND		0.0010
1,2-Dichloroethane	ND		0.0010
Trichloroethene	ND		0.0010
1,2-Dichloropropane	ND		0.0010
Dibromomethane	ND		0.0010
Bromodichloromethane	ND		0.0010
2-Chloroethyl Vinyl Ether	ND		0.0050
(cis) 1,3-Dichloropropene	ND		0.0010
(trans) 1,3-Dichloropropene	ND		0.0010

Date of Report: June 20, 2007
 Samples Submitted: June 12, 2007
 Laboratory Reference: 0706-103
 Project: 650-001

**HALOGENATED VOLATILES by EPA 8260B
 METHOD BLANK QUALITY CONTROL**

page 2 of 2

Lab ID: MB0613S1

Compound	Results	Flags	PQL
1,1,2-Trichloroethane	ND		0.0010
Tetrachloroethene	ND		0.0010
1,3-Dichloropropane	ND		0.0010
Dibromochloromethane	ND		0.0010
1,2-Dibromoethane	ND		0.0010
Chlorobenzene	ND		0.0010
1,1,1,2-Tetrachloroethane	ND		0.0010
Bromoform	ND		0.0010
Bromobenzene	ND		0.0010
1,1,2,2-Tetrachloroethane	ND		0.0010
1,2,3-Trichloropropane	ND		0.0010
2-Chlorotoluene	ND		0.0010
4-Chlorotoluene	ND		0.0010
1,3-Dichlorobenzene	ND		0.0010
1,4-Dichlorobenzene	ND		0.0010
1,2-Dichlorobenzene	ND		0.0010
1,2-Dibromo-3-chloropropane	ND		0.0050
1,2,4-Trichlorobenzene	ND		0.0010
Hexachlorobutadiene	ND		0.0050
1,2,3-Trichlorobenzene	ND		0.0010

Surrogate	Percent Recovery	Control Limits
Dibromofluoromethane	83	70-118
Toluene, d8	92	70-121
4-Bromofluorobenzene	96	70-130

Date of Report: June 20, 2007
 Samples Submitted: June 12, 2007
 Laboratory Reference: 0706-103
 Project: 650-001

**HALOGENATED VOLATILES by EPA 8260B
 METHOD BLANK QUALITY CONTROL**

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Date Extracted: 6-14-07
 Date Analyzed: 6-14-07
 Matrix: Soil
 Units: mg/kg (ppm)
 Lab ID: MB0614S1

Compound	Results	Flags	PQL
Dichlorodifluoromethane	ND		0.0010
Chloromethane	ND		0.0010
Vinyl Chloride	ND		0.0010
Bromomethane	ND		0.0050
Chloroethane	ND		0.0010
Trichlorofluoromethane	ND		0.0010
1,1-Dichloroethene	ND		0.0010
Iodomethane	ND		0.0050
Methylene Chloride	ND		0.010
(trans) 1,2-Dichloroethene	ND		0.0010
1,1-Dichloroethane	ND		0.0010
2,2-Dichloropropane	ND		0.0010
(cis) 1,2-Dichloroethene	ND		0.0010
Bromochloromethane	ND		0.0010
Chloroform	ND		0.0010
1,1,1-Trichloroethane	ND		0.0010
Carbon Tetrachloride	ND		0.0010
1,1-Dichloropropene	ND		0.0010
1,2-Dichloroethane	ND		0.0010
Trichloroethene	ND		0.0010
1,2-Dichloropropane	ND		0.0010
Dibromomethane	ND		0.0010
Bromodichloromethane	ND		0.0010
2-Chloroethyl Vinyl Ether	ND		0.0050
(cis) 1,3-Dichloropropene	ND		0.0010
(trans) 1,3-Dichloropropene	ND		0.0010

Date of Report: June 20, 2007
 Samples Submitted: June 12, 2007
 Laboratory Reference: 0706-103
 Project: 650-001

**HALOGENATED VOLATILES by EPA 8260B
 METHOD BLANK QUALITY CONTROL**

page 2 of 2

Lab ID: MB0614S1

Compound	Results	Flags	PQL
1,1,2-Trichloroethane	ND		0.0010
Tetrachloroethene	ND		0.0010
1,3-Dichloropropane	ND		0.0010
Dibromochloromethane	ND		0.0010
1,2-Dibromoethane	ND		0.0010
Chlorobenzene	ND		0.0010
1,1,1,2-Tetrachloroethane	ND		0.0010
Bromoform	ND		0.0010
Bromobenzene	ND		0.0010
1,1,2,2-Tetrachloroethane	ND		0.0010
1,2,3-Trichloropropane	ND		0.0010
2-Chlorotoluene	ND		0.0010
4-Chlorotoluene	ND		0.0010
1,3-Dichlorobenzene	ND		0.0010
1,4-Dichlorobenzene	ND		0.0010
1,2-Dichlorobenzene	ND		0.0010
1,2-Dibromo-3-chloropropane	ND		0.0050
1,2,4-Trichlorobenzene	ND		0.0010
Hexachlorobutadiene	ND		0.0050
1,2,3-Trichlorobenzene	ND		0.0010

Surrogate	Percent Recovery	Control Limits
Dibromofluoromethane	85	70-118
Toluene, d8	78	70-121
4-Bromofluorobenzene	91	70-130

Date of Report: June 20, 2007
 Samples Submitted: June 12, 2007
 Laboratory Reference: 0706-103
 Project: 650-001

**HALOGENATED VOLATILES by EPA 8260B
 SB/SBD QUALITY CONTROL**

Date Extracted: 6-13-07
 Date Analyzed: 6-13-07

Matrix: Soil
 Units: mg/kg (ppm)

Lab ID: SB0613S1

Compound	Spike Amount	SB	Percent Recovery	SBD	Percent Recovery	Recovery Limits	Flags
1,1-Dichloroethene	0.0500	0.0506	101	0.0513	103	70-130	
Benzene	0.0500	0.0490	98	0.0480	96	70-127	
Trichloroethene	0.0500	0.0486	97	0.0487	97	73-117	
Toluene	0.0500	0.0455	91	0.0464	93	78-115	
Chlorobenzene	0.0500	0.0511	102	0.0505	101	80-117	

	RPD	RPD Limit	Flags
1,1-Dichloroethene	2	10	
Benzene	2	11	
Trichloroethene	0	13	
Toluene	2	12	
Chlorobenzene	1	10	

Date of Report: June 20, 2007
 Samples Submitted: June 12, 2007
 Laboratory Reference: 0706-103
 Project: 650-001

**HALOGENATED VOLATILES by EPA 8260B
 SB/SBD QUALITY CONTROL**

Date Extracted: 6-14-07
 Date Analyzed: 6-14-07

Matrix: Soil
 Units: mg/kg (ppm)

Lab ID: SB0614S1

Compound	Spike Amount	SB	Percent Recovery	SBD	Percent Recovery	Recovery Limits	Flags
1,1-Dichloroethene	0.0500	0.0528	106	0.0538	108	70-130	
Benzene	0.0500	0.0484	97	0.0470	94	70-127	
Trichloroethene	0.0500	0.0488	98	0.0493	99	73-117	
Toluene	0.0500	0.0462	92	0.0457	91	78-115	
Chlorobenzene	0.0500	0.0489	98	0.0466	93	80-117	

	RPD	RPD Limit	Flags
1,1-Dichloroethene	2	10	
Benzene	3	11	
Trichloroethene	1	13	
Toluene	1	12	
Chlorobenzene	5	10	

Date of Report: June 20, 2007
Samples Submitted: June 12, 2007
Laboratory Reference: 0706-103
Project: 650-001

% MOISTURE

Date Analyzed: 6-13-07

Client ID	Lab ID	% Moisture
FB3-1	06-103-01	17
FB3-6	06-103-02	32
FB3-9	06-103-03	15
FB4-0.5	06-103-04	7
FB4-5	06-103-05	4
FB4-9	06-103-06	6
FB5-0.5	06-103-07	3
FB5-3	06-103-08	9
FB5-5	06-103-09	3



Data Qualifiers and Abbreviations

- A - Due to a high sample concentration, the amount spiked is insufficient for meaningful MS/MSD recovery data.
- B - The analyte indicated was also found in the blank sample.
- C - The duplicate RPD is outside control limits due to high result variability when analyte concentrations are within five times the quantitation limit.
- E - The value reported exceeds the quantitation range and is an estimate.
- F - Surrogate recovery data is not available due to the high concentration of coeluting target compounds.
- H - The analyte indicated is a common laboratory solvent and may have been introduced during sample preparation, and be impacting the sample result.
- I - Compound recovery is outside of the control limits
- J - The value reported was below the practical quantitation limit. The value is an estimate
- K - Sample duplicate RPD is outside control limits due to sample inhomogeneity. The sample was re-extracted and re-analyzed with similar results.
- L - The RPD is outside of the control limits.
- M - Hydrocarbons in the gasoline range are impacting the diesel range result.
- M1 - Hydrocarbons in the gasoline range (toluene-naphthalene) are present in the sample.
- N - Hydrocarbons in the lube oil range are impacting the diesel range result.
- O - Hydrocarbons indicative of heavier fuels are present in the sample and are impacting the gasoline result.
- P - The RPD of the detected concentrations between the two columns is greater than 40.
- Q - Surrogate recovery is outside of the control limits.
- S - Surrogate recovery data is not available due to the necessary dilution of the sample.
- T - The sample chromatogram is not similar to a typical _____.
- U - The analyte was analyzed for, but was not detected above the reported sample quantitation limit.
- U1 - The practical quantitation limit is elevated due to interferences present in the sample.
- V - Matrix Spike/Matrix Spike Duplicate recoveries are outside control limits due to matrix effects.
- W - Matrix Spike/Matrix Spike Duplicate RPD are outside control limits due to matrix effects.
- X - Sample extract treated with a mercury cleanup procedure.
- Y - Sample extract treated with an acid/silica gel cleanup procedure.
- Z -
- ND - Not Detected at PQL
- PQL - Practical Quantitation Limit
- RPD - Relative Percent Difference



OnSite Environmental Inc.
 14848 NE 95th Street • Redmond, WA 98052
 Phone: (425) 885-3881 • Fax: (425) 885-4603

Chain of Custody

Turnaround Request
(in working days)

Laboratory Number: **06-103**

Company: Favallan Consulty
 Project Number: 65D-001
 Project Name: Cleaning Ctr of Redmond
 Project Manager: Jennifer Cyr
 Sampled by: J. Cyr / D. Clout

(Check One)
 Same Day 1 Day
 2 Day 3 Day
 Standard (7 working days)
 _____ (other)

Requested Analysis

Lab ID	Sample Identification	Date Sampled	Time Sampled	Matrix	# of Cont.	NWTPH-HCID	NWTPH-Gx/BTEX	NWTPH-Dx	Volatiles by 8260B	Halogenated Volatiles by 8260B	Semivolatiles by 8270C	PAHs by 8270C / SIM	PCBs by 8082	Pesticides by 8081A	Herbicides by 8151A	Total RCRA Metals (8)	TCLP Metals	HEM by 1664	VPH	EPH	% Moisture					
1	FB3-1	6-12-07	0835	S	4					X												X				
2	FB3-6		0850							X																
3	FB3-9		0920					X																		
4	FB4-0.5		1015					X																		
5	FB4-5		1025					X																		
6	FB4-9		1050					X																		
7	FB5-0.5		1110					X																		
8	FB5-3		1115					X																		
9	FB5-5		1120					X																		
			<u>J. Cyr</u>																							

Signature	Company	Date	Time	Comments/Special Instructions:
<u>J. Cyr</u>	<u>Favallan Consulty</u>	<u>6-12-07</u>	<u>1255</u>	
<u>[Signature]</u>	<u>OSide Env.</u>	<u>6/12/07</u>	<u>1255</u>	
Reviewed by/Data	Reviewed by/Data	Chromatograms with final report <input type="checkbox"/>		



14648 NE 95th Street, Redmond, WA 98052 • (425) 883-3881

June 22, 2007

Jennifer Cyr
Farallon Consulting, LLC
975 5th Avenue NW
Issaquah, WA 98027

Re: Analytical Data for Project 650-001
Laboratory Reference No. 0706-190

Dear Jennifer:

Enclosed are the analytical results and associated quality control data for samples submitted on June 20, 2007.

The standard policy of OnSite Environmental Inc. is to store your samples for 30 days from the date of receipt. If you require longer storage, please contact the laboratory.

We appreciate the opportunity to be of service to you on this project. If you have any questions concerning the data, or need additional information, please feel free to call me.

Sincerely,

A handwritten signature in black ink, appearing to read "DB", with a long horizontal flourish extending to the right.

David Baumeister
Project Manager

Enclosures

Date of Report: June 22, 2007
Samples Submitted: June 20, 2007
Laboratory Reference: 0706-190
Project: 650-001

Case Narrative

Samples were collected on June 20, 2007 and received by the laboratory on June 20, 2007. They were maintained at the laboratory at a temperature of 2°C to 6°C except as noted below.

General QA/QC issues associated with the analytical data enclosed in this laboratory report will be indicated with a reference to a comment or explanation on the Data Qualifier page. More complex and involved QA/QC issues will be discussed in detail below.

Halogenated Volatiles EPA 8260B Analysis

Per EPA Method 5035A, samples were received by the laboratory in pre-weighed 40 mL VOA vials within 48 hours of sample collection. They were stored in a freezer at between -7°C and -20°C until extraction or analysis.

Any other QA/QC issues associated with this extraction and analysis will be indicated with a footnote reference and discussed in detail on the Data Qualifier page.

Date of Report: June 22, 2007
 Samples Submitted: June 20, 2007
 Laboratory Reference: 0706-190
 Project: 650-001

HALOGENATED VOLATILES by EPA 8260B

page 1 of 2

Date Extracted: 6-20-07
 Date Analyzed: 6-20-07

 Matrix: Soil
 Units: mg/kg (ppm)

 Lab ID: 06-190-01
 Client ID: MW10-11

Compound	Results	Flags	PQL
Dichlorodifluoromethane	ND		0.00093
Chloromethane	ND		0.00093
Vinyl Chloride	ND		0.00093
Bromomethane	ND		0.0047
Chloroethane	ND		0.00093
Trichlorofluoromethane	ND		0.00093
1,1-Dichloroethene	ND		0.00093
Iodomethane	ND		0.0047
Methylene Chloride	ND		0.0047
(trans) 1,2-Dichloroethene	ND		0.00093
1,1-Dichloroethane	ND		0.00093
2,2-Dichloropropane	ND		0.00093
(cis) 1,2-Dichloroethene	ND		0.00093
Bromochloromethane	ND		0.00093
Chloroform	ND		0.00093
1,1,1-Trichloroethane	ND		0.00093
Carbon Tetrachloride	ND		0.00093
1,1-Dichloropropene	ND		0.00093
1,2-Dichloroethane	ND		0.00093
Trichloroethene	ND		0.00093
1,2-Dichloropropane	ND		0.00093
Dibromomethane	ND		0.00093
Bromodichloromethane	ND		0.00093
2-Chloroethyl Vinyl Ether	ND		0.0047
(cis) 1,3-Dichloropropene	ND		0.00093
(trans) 1,3-Dichloropropene	ND		0.00093

Date of Report: June 22, 2007
 Samples Submitted: June 20, 2007
 Laboratory Reference: 0706-190
 Project: 650-001

HALOGENATED VOLATILES by EPA 8260B

page 2 of 2

Lab ID: 06-190-01
 Client ID: MW10-11

Compound	Results	Flags	PQL
1,1,2-Trichloroethane	ND		0.00093
Tetrachloroethene	ND		0.00093
1,3-Dichloropropane	ND		0.00093
Dibromochloromethane	ND		0.00093
1,2-Dibromoethane	ND		0.00093
Chlorobenzene	ND		0.00093
1,1,1,2-Tetrachloroethane	ND		0.00093
Bromoform	ND		0.00093
Bromobenzene	ND		0.00093
1,1,1,2,2-Tetrachloroethane	ND		0.00093
1,2,3-Trichloropropane	ND		0.00093
2-Chlorotoluene	ND		0.00093
4-Chlorotoluene	ND		0.00093
1,3-Dichlorobenzene	ND		0.00093
1,4-Dichlorobenzene	ND		0.00093
1,2-Dichlorobenzene	ND		0.00093
1,2-Dibromo-3-chloropropane	ND		0.0047
1,2,4-Trichlorobenzene	ND		0.00093
Hexachlorobutadiene	ND		0.0047
1,2,3-Trichlorobenzene	ND		0.00093

Surrogate	Percent Recovery	Control Limits
Dibromofluoromethane	85	70-118
Toluene, d8	80	70-121
4-Bromofluorobenzene	94	70-130

Date of Report: June 22, 2007
 Samples Submitted: June 20, 2007
 Laboratory Reference: 0706-190
 Project: 650-001

**HALOGENATED VOLATILES by EPA 8260B
 METHOD BLANK QUALITY CONTROL**

page 1 of 2

Date Extracted: 6-20-07
 Date Analyzed: 6-20-07
 Matrix: Soil
 Units: mg/kg (ppm)
 Lab ID: MB0620S1

Compound	Results	Flags	PQL
Dichlorodifluoromethane	ND		0.0010
Chloromethane	ND		0.0010
Vinyl Chloride	ND		0.0010
Bromomethane	ND		0.0050
Chloroethane	ND		0.0010
Trichlorofluoromethane	ND		0.0010
1,1-Dichloroethene	ND		0.0010
Iodomethane	ND		0.0050
Methylene Chloride	ND		0.0050
(trans) 1,2-Dichloroethene	ND		0.0010
1,1-Dichloroethane	ND		0.0010
2,2-Dichloropropane	ND		0.0010
(cis) 1,2-Dichloroethene	ND		0.0010
Bromochloromethane	ND		0.0010
Chloroform	ND		0.0010
1,1,1-Trichloroethane	ND		0.0010
Carbon Tetrachloride	ND		0.0010
1,1-Dichloropropene	ND		0.0010
1,2-Dichloroethane	ND		0.0010
Trichloroethene	ND		0.0010
1,2-Dichloropropane	ND		0.0010
Dibromomethane	ND		0.0010
Bromodichloromethane	ND		0.0010
2-Chloroethyl Vinyl Ether	ND		0.0050
(cis) 1,3-Dichloropropene	ND		0.0010
(trans) 1,3-Dichloropropene	ND		0.0010

Date of Report: June 22, 2007
 Samples Submitted: June 20, 2007
 Laboratory Reference: 0706-190
 Project: 650-001

HALOGENATED VOLATILES by EPA 8260B
METHOD BLANK QUALITY CONTROL
 page 2 of 2

Lab ID: MB0620S1

Compound	Results	Flags	PQL
1,1,2-Trichloroethane	ND		0.0010
Tetrachloroethene	ND		0.0010
1,3-Dichloropropane	ND		0.0010
Dibromochloromethane	ND		0.0010
1,2-Dibromoethane	ND		0.0010
Chlorobenzene	ND		0.0010
1,1,1,2-Tetrachloroethane	ND		0.0010
Bromoform	ND		0.0010
Bromobenzene	ND		0.0010
1,1,1,2,2-Tetrachloroethane	ND		0.0010
1,2,3-Trichloropropane	ND		0.0010
2-Chlorotoluene	ND		0.0010
4-Chlorotoluene	ND		0.0010
1,3-Dichlorobenzene	ND		0.0010
1,4-Dichlorobenzene	ND		0.0010
1,2-Dichlorobenzene	ND		0.0010
1,2-Dibromo-3-chloropropane	ND		0.0050
1,2,4-Trichlorobenzene	ND		0.0010
Hexachlorobutadiene	ND		0.0050
1,2,3-Trichlorobenzene	ND		0.0010

Surrogate	Percent Recovery	Control Limits
Dibromofluoromethane	81	70-118
Toluene, d8	77	70-121
4-Bromofluorobenzene	102	70-130

Date of Report: June 22, 2007
 Samples Submitted: June 20, 2007
 Laboratory Reference: 0706-190
 Project: 650-001

**HALOGENATED VOLATILES by EPA 8260B
 SB/SBD QUALITY CONTROL**

Date Extracted: 6-20-07
 Date Analyzed: 6-20-07
 Matrix: Soil
 Units: mg/kg (ppm)

Lab ID: SB0620S1

Compound	Spike Amount	SB	Percent Recovery	SBD	Percent Recovery	Recovery Limits	Flags
1,1-Dichloroethene	0.0500	0.0495	99	0.0496	99	70-130	
Benzene	0.0500	0.0491	98	0.0489	98	70-127	
Trichloroethene	0.0500	0.0517	103	0.0506	101	73-117	
Toluene	0.0500	0.0494	99	0.0484	97	78-115	
Chlorobenzene	0.0500	0.0514	103	0.0485	97	80-117	

	RPD	RPD Limit	Flags
1,1-Dichloroethene	0	10	
Benzene	0	11	
Trichloroethene	2	13	
Toluene	2	12	
Chlorobenzene	6	10	

Date of Report: June 22, 2007
Samples Submitted: June 20, 2007
Laboratory Reference: 0706-190
Project: 650-001

% MOISTURE

Date Analyzed: 6-20-07

Client ID	Lab ID	% Moisture
MW10-11	06-190-01	5



Data Qualifiers and Abbreviations

A - Due to a high sample concentration, the amount spiked is insufficient for meaningful MS/MSD recovery data

B - The analyte indicated was also found in the blank sample.

C - The duplicate RPD is outside control limits due to high result variability when analyte concentrations are within five times the quantitation limit.

E - The value reported exceeds the quantitation range and is an estimate.

F - Surrogate recovery data is not available due to the high concentration of coeluting target compounds.

H - The analyte indicated is a common laboratory solvent and may have been introduced during sample preparation, and be impacting the sample result.

I - Compound recovery is outside of the control limits

J - The value reported was below the practical quantitation limit. The value is an estimate.

K - Sample duplicate RPD is outside control limits due to sample inhomogeneity. The sample was re-extracted and re-analyzed with similar results.

L - The RPD is outside of the control limits.

M - Hydrocarbons in the gasoline range are impacting the diesel range result

M1 - Hydrocarbons in the gasoline range (toluene-naphthalene) are present in the sample.

N - Hydrocarbons in the lube oil range are impacting the diesel range result.

O - Hydrocarbons indicative of heavier fuels are present in the sample and are impacting the gasoline result

P - The RPD of the detected concentrations between the two columns is greater than 40.

Q - Surrogate recovery is outside of the control limits

S - Surrogate recovery data is not available due to the necessary dilution of the sample.

T - The sample chromatogram is not similar to a typical _____.

U - The analyte was analyzed for, but was not detected above the reported sample quantitation limit.

U1 - The practical quantitation limit is elevated due to interferences present in the sample.

V - Matrix Spike/Matrix Spike Duplicate recoveries are outside control limits due to matrix effects.

W - Matrix Spike/Matrix Spike Duplicate RPD are outside control limits due to matrix effects.

X - Sample extract treated with a mercury cleanup procedure.

Y - Sample extract treated with an acid/silica gel cleanup procedure

Z -

ND - Not Detected at PQL

PQL - Practical Quantitation Limit

RPD - Relative Percent Difference



Chain of Custody

Turnaround Request (in working days)

(Check One)

Same Day 1 Day

2 Day 3 Day

Standard (7 working days)

_____ (other)

Laboratory Number: 06-190

Requested Analysis

Company: Farallon

Project Number: 650-001

Project Name: Cleaning Center of Redmond

Project Manager: J. Cyr

Sampled by: D. Clement

Lab ID	Sample Identification	Date Sampled	Time Sampled	Matrix	# of Cont.	NWTPH-HCID	NWTPH-Gx/BTEX	NWTPH-Dx	Volatiles by 8260B <u>AVOCs_{cont}</u>	Halogenated Volatiles by 8260B	Semivolatiles by 8270C	PAHs by 8270C / SIM	PCBs by 8082	Pesticides by 8081A	Herbicides by 8151A	Total RCRA Metals (8)	TCLP Metals	HEM by 1664	VPH	EPH	% Moisture	
1	MW10-11	6/20/07	0825	S	4				X													
2	MW10-6	1	0820	1	1																	
3	MW10-26	1	0840	1	1																	

Signature	Company	Date	Time	Comments/Special Instructions:
Relinquished by <u>D. Clement</u>	Farallon	6/20/07		
Received by <u>J. Cyr</u>	<u>OSI</u>	6-20-07	11:00A	
Relinquished by				
Received by				
Relinquished by				
Received by				
Reviewed by/Date	Reviewed by/Date	Chromatograms with final report <input type="checkbox"/>		



AN ENVIRONMENTAL ANALYTICAL LABORATORY

WORK ORDER #: 0706269

Work Order Summary

CLIENT: Ms. Jennifer Cyr
Farallon Consulting, LLC
975 5th Avenue NW
Issaquah, WA 98027-3333

BILL TO: Ms. Jennifer Cyr
Farallon Consulting, LLC
975 5th Avenue NW
Issaquah, WA 98027-3333

PHONE: 425-427-0061
FAX: 425-427-0067
DATE RECEIVED: 06/14/2007
DATE COMPLETED: 06/26/2007

P.O. # 650-001
PROJECT # 650-001 Cleaning Center of Redmond
CONTACT: Sarah Nguyen

Table with 4 columns: FRACTION#, NAME, TEST, RECEIPT VAC/PRES. Rows include 01A, 02A, 02AA, 03A, 04A, 05A with corresponding test names and results.

CERTIFIED BY: [Signature]

DATE: 06/26/07

Laboratory Director

Certification numbers: CA NELAP - 02110CA, LA NELAP/LELAP- AI 30763, NJ NELAP - CA004
NY NELAP - 11291, UT NELAP - 9166389892

Name of Accrediting Agency: NELAP/Florida Department of Health, Scope of Application: Clean Air Act,
Accreditation number: E87680, Effective date: 07/01/06, Expiration date: 06/30/07

Air Toxics Ltd. certifies that the test results contained in this report meet all requirements of the NELAC standards

This report shall not be reproduced, except in full, without the written approval of Air Toxics Ltd

180 BLUE RAVINE ROAD. SUITE B FOLSOM. CA - 95630
(916) 985-1000 . (800) 985-5955 . FAX (916) 985-1020

LABORATORY NARRATIVE
Modified TO-15 SIM
Farallon Consulting, LLC
Workorder# 0706269

Two 6 Liter Summa Canister (SIM Certified) samples were received on June 14, 2007. The laboratory performed analysis via modified EPA Method TO-15 using GC/MS in the SIM acquisition mode. The method involves concentrating up to 0.5 liters of air. The concentrated aliquot is then flash vaporized and swept through a water management system to remove water vapor. Following dehumidification, the sample passes directly into the GC/MS for analysis.

This workorder was independently validated prior to submittal using 'USEPA National Functional Guidelines' as generally applied to the analysis of volatile organic compounds in air. A rules-based, logic driven, independent validation engine was employed to assess completeness, evaluate pass/fail of relevant project quality control requirements and verification of all quantified amounts.

Method modifications taken to run these samples are summarized in the below table. Specific project requirements may over-ride the ATL modifications.

<i>Requirement</i>	<i>TO-15</i>	<i>ATL Modifications</i>
ICAL %RSD acceptance criteria	<=30% RSD with 2 compounds allowed out to < 40% RSD	Project specific; default criteria is <=30% RSD with 10% of compounds allowed out to < 40% RSD
Daily Calibration	+ - 30% Difference	Project specific; default criteria is <= 30% Difference with 10% of compounds allowed out up to <=40%.; flag and narrate outliers
Blank and standards	Zero air	Nitrogen
Method Detection Limit	Follow 40CFR Pt 136 App B	The MDL met all relevant requirements in Method TO-15 (statistical MDL less than the LOQ). The concentration of the spiked replicate may have exceeded 10X the calculated MDL in some cases

Receiving Notes

There were no receiving discrepancies.

Analytical Notes

There were no analytical discrepancies.

Definition of Data Qualifying Flags

Eight qualifiers may have been used on the data analysis sheets and indicates as follows:

B - Compound present in laboratory blank greater than reporting limit (background subtraction not performed).

J - Estimated value.

E - Exceeds instrument calibration range.

S - Saturated peak.

Q - Exceeds quality control limits.



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- U - Compound analyzed for but not detected above the reporting limit
- UJ- Non-detected compound associated with low bias in the CCV
- N - The identification is based on presumptive evidence.

File extensions may have been used on the data analysis sheets and indicates as follows:

- a-File was requantified
- b-File was quantified by a second column and detector
- r1-File was requantified for the purpose of reissue



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Summary of Detected Compounds MODIFIED EPA METHOD TO-15 GC/MS SIM

Client Sample ID: IA-1

Lab ID#: 0706269-01A

Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (uG/m3)	Amount (uG/m3)
Tetrachloroethene	0.035	0.20	0.24	1.4

Client Sample ID: IA-2

Lab ID#: 0706269-02A

Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (uG/m3)	Amount (uG/m3)
Tetrachloroethene	0.035	0.20	0.24	1.4

Client Sample ID: IA-2 Lab Duplicate

Lab ID#: 0706269-02AA

Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (uG/m3)	Amount (uG/m3)
Tetrachloroethene	0.035	0.20	0.24	1.4



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Client Sample ID: IA-1

Lab ID#: 0706269-01A

MODIFIED EPA METHOD TO-15 GC/MS SIM

File Name:	y061406sim	Date of Collection: 6/12/07
Dil. Factor:	1.75	Date of Analysis: 6/14/07 03:52 PM

Compound	Rot. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (uG/m3)	Amount (uG/m3)
Trichloroethene	0.035	Not Detected	0.19	Not Detected
Tetrachloroethene	0.035	0.20	0.24	1.4

Container Type: 6 Liter Summa Canister (SIM Certified)

Surrogates	%Recovery	Method Limits
1,2-Dichloroethane-d4	109	70-130
Toluene-d8	96	70-130
4-Bromofluorobenzene	103	70-130



AN ENVIRONMENTAL ANALYTICAL LABORATORY

Client Sample ID: IA-2

Lab ID#: 0706269-02A

MODIFIED EPA METHOD TO-15 GC/MS SIM

File Name:	y061407sim	Date of Collection: 6/12/07
Dil. Factor:	1.75	Date of Analysis: 6/14/07 04:46 PM

Compound	Rot. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (uG/m3)	Amount (uG/m3)
Trichloroethene	0.035	Not Detected	0.19	Not Detected
Tetrachloroethene	0.035	0.20	0.24	1.4

Container Type: 6 Liter Summa Canister (SIM Certified)

Surrogates	%Recovery	Method Limits
1,2-Dichloroethane-d4	110	70-130
Toluene-d8	97	70-130
4-Bromofluorobenzene	102	70-130



AN ENVIRONMENTAL ANALYTICAL LABORATORY

Client Sample ID: IA-2 Lab Duplicate

Lab ID#: 0706269-02AA

MODIFIED EPA METHOD TO-15 GC/MS SIM

File Name:	y061409sim	Date of Collection: 6/12/07
Dil. Factor:	1.75	Date of Analysis: 6/14/07 06:29 PM

Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (uG/m3)	Amount (uG/m3)
Trichloroethene	0.035	Not Detected	0.19	Not Detected
Tetrachloroethene	0.035	0.20	0.24	1.4

Container Type: 6 Liter Summa Canister (SIM Certified)

Surrogates	%Recovery	Method Limits
1,2-Dichloroethane-d4	108	70-130
Toluene-d8	98	70-130
4-Bromofluorobenzene	103	70-130



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Client Sample ID: Lab Blank

Lab ID#: 0706269-03A

MODIFIED EPA METHOD TO-15 GC/MS SIM

File Name:	y061404sim	Date of Collection: NA
Dil. Factor:	1.00	Date of Analysis: 6/14/07 11:53 AM

Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (uG/m3)	Amount (uG/m3)
Trichloroethene	0.020	Not Detected	0.11	Not Detected
Tetrachloroethene	0.020	Not Detected	0.14	Not Detected

Container Type: NA - Not Applicable

Surrogates	%Recovery	Method Limits
1,2-Dichloroethane-d4	110	70-130
Toluene-d8	96	70-130
4-Bromofluorobenzene	93	70-130



AN ENVIRONMENTAL ANALYTICAL LABORATORY

Client Sample ID: CCV

Lab ID#: 0706269-04A

MODIFIED EPA METHOD TO-15 GC/MS SIM

File Name:	y061402sim	Date of Collection: NA
Dil. Factor:	1.00	Date of Analysis: 6/14/07 10:23 AM

Compound	%Recovery
Trichloroethene	95
Tetrachloroethene	101

Container Type: NA - Not Applicable

Surrogates	%Recovery	Method Limits
1,2-Dichloroethane-d4	101	70-130
Toluene-d8	108	70-130
4-Bromofluorobenzene	102	70-130



AN ENVIRONMENTAL ANALYTICAL LABORATORY

Client Sample ID: LCS

Lab ID#: 0706269-05A

MODIFIED EPA METHOD TO-15 GC/MS SIM

File Name:	y061403sim	Date of Collection: NA
Dil. Factor:	1.00	Date of Analysis: 6/14/07 11:03 AM

Compound	%Recovery
Trichloroethene	97
Tetrachloroethene	104

Container Type: NA - Not Applicable

Surrogates	%Recovery	Method Limits
1,2-Dichloroethane-d4	105	70-130
Toluene-d8	106	70-130
4-Bromofluorobenzene	102	70-130



14648 NE 95th Street, Redmond, WA 98052 • (425) 883-3881

June 29, 2007

Jennifer Cyr
Farallon Consulting, LLC
975 5th Avenue NW
Issaquah, WA 98027

Re: Analytical Data for Project 650-001
Laboratory Reference No. 0706-222

Dear Jennifer:

Enclosed are the analytical results and associated quality control data for samples submitted on June 22, 2007.

The standard policy of OnSite Environmental Inc. is to store your samples for 30 days from the date of receipt. If you require longer storage, please contact the laboratory.

We appreciate the opportunity to be of service to you on this project. If you have any questions concerning the data, or need additional information, please feel free to call me.

Sincerely,

A handwritten signature in black ink, appearing to read 'DB', with a long horizontal line extending to the right.

David Baumeister
Project Manager

Enclosures

Date of Report: June 29, 2007
Samples Submitted: June 22, 2007
Laboratory Reference: 0706-222
Project: 650-001

Case Narrative

Samples were collected on June 22, 2007 and received by the laboratory on June 22, 2007. They were maintained at the laboratory at a temperature of 2°C to 6°C except as noted below.

General QA/QC issues associated with the analytical data enclosed in this laboratory report will be indicated with a reference to a comment or explanation on the Data Qualifier page. More complex and involved QA/QC issues will be discussed in detail below.

Date of Report: June 29, 2007
 Samples Submitted: June 22, 2007
 Laboratory Reference: 0706-222
 Project: 650-001

HALOGENATED VOLATILES by EPA 8260B

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Date Extracted: 6-22-07
 Date Analyzed: 6-22-07

Matrix: Water
 Units: ug/L (ppb)

Lab ID: 06-222-01
 Client ID: MW10-GW062207

Compound	Results	Flags	PQL
Dichlorodifluoromethane	ND		0.20
Chloromethane	ND		0.20
Vinyl Chloride	ND		0.20
Bromomethane	ND		0.20
Chloroethane	ND		0.20
Trichlorofluoromethane	ND		0.20
1,1-Dichloroethene	ND		0.20
Iodomethane	ND		1.0
Methylene Chloride	ND		1.0
(trans) 1,2-Dichloroethene	ND		0.20
1,1-Dichloroethane	ND		0.20
2,2-Dichloropropane	ND		0.20
(cis) 1,2-Dichloroethene	ND		0.20
Bromochloromethane	ND		0.20
Chloroform	ND		0.20
1,1,1-Trichloroethane	ND		0.20
Carbon Tetrachloride	ND		0.20
1,1-Dichloropropene	ND		0.20
1,2-Dichloroethane	ND		0.20
Trichloroethene	0.48		0.20
1,2-Dichloropropane	ND		0.20
Dibromomethane	ND		0.20
Bromodichloromethane	ND		0.20
2-Chloroethyl Vinyl Ether	ND		1.0
(cis) 1,3-Dichloropropene	ND		0.20
(trans) 1,3-Dichloropropene	ND		0.20

Date of Report: June 29, 2007
 Samples Submitted: June 22, 2007
 Laboratory Reference: 0706-222
 Project: 650-001

HALOGENATED VOLATILES by EPA 8260B

Page 2 of 2

Lab ID: 06-222-01
 Client ID: MW10-GW062207

Compound	Results	Flags	PQL
1,1,2-Trichloroethane	ND		0.20
Tetrachloroethene	7.4		0.20
1,3-Dichloropropane	ND		0.20
Dibromochloromethane	ND		0.20
1,2-Dibromoethane	ND		0.20
Chlorobenzene	ND		0.20
1,1,1,2-Tetrachloroethane	ND		0.20
Bromoform	ND		1.0
Bromobenzene	ND		0.20
1,1,1,2,2-Tetrachloroethane	ND		0.20
1,2,3-Trichloropropane	ND		0.20
2-Chlorotoluene	ND		0.20
4-Chlorotoluene	ND		0.20
1,3-Dichlorobenzene	ND		0.20
1,4-Dichlorobenzene	ND		0.20
1,2-Dichlorobenzene	ND		0.20
1,2-Dibromo-3-chloropropane	ND		1.0
1,2,4-Trichlorobenzene	ND		0.20
Hexachlorobutadiene	ND		0.20
1,2,3-Trichlorobenzene	ND		0.20

Surrogate	Percent Recovery	Control Limits
Dibromofluoromethane	97	71-126
Toluene, d8	91	76-116
4-Bromofluorobenzene	92	70-123

Date of Report: June 29, 2007
 Samples Submitted: June 22, 2007
 Laboratory Reference: 0706-222
 Project: 650-001

**HALOGENATED VOLATILES by EPA 8260B
 METHOD BLANK QUALITY CONTROL**

Page 1 of 2

Date Extracted: 6-22-07
 Date Analyzed: 6-22-07
 Matrix: Water
 Units: ug/L (ppb)
 Lab ID: MB0622W1

Compound	Results	Flags	PQL
Dichlorodifluoromethane	ND		0.20
Chloromethane	ND		0.20
Vinyl Chloride	ND		0.20
Bromomethane	ND		0.20
Chloroethane	ND		0.20
Trichlorofluoromethane	ND		0.20
1,1-Dichloroethene	ND		0.20
Iodomethane	ND		1.0
Methylene Chloride	ND		1.0
(trans) 1,2-Dichloroethene	ND		0.20
1,1-Dichloroethane	ND		0.20
2,2-Dichloropropane	ND		0.20
(cis) 1,2-Dichloroethene	ND		0.20
Bromochloromethane	ND		0.20
Chloroform	ND		0.20
1,1,1-Trichloroethane	ND		0.20
Carbon Tetrachloride	ND		0.20
1,1-Dichloropropene	ND		0.20
1,2-Dichloroethane	ND		0.20
Trichloroethene	ND		0.20
1,2-Dichloropropane	ND		0.20
Dibromomethane	ND		0.20
Bromodichloromethane	ND		0.20
2-Chloroethyl Vinyl Ether	ND		1.0
(cis) 1,3-Dichloropropene	ND		0.20
(trans) 1,3-Dichloropropene	ND		0.20

Date of Report: June 29, 2007
 Samples Submitted: June 22, 2007
 Laboratory Reference: 0706-222
 Project: 650-001

**HALOGENATED VOLATILES by EPA 8260B
 METHOD BLANK QUALITY CONTROL**

Page 2 of 2

Lab ID: MB0622W1

Compound	Results	Flags	PQL
1,1,2-Trichloroethane	ND		0.20
Tetrachloroethene	ND		0.20
1,3-Dichloropropane	ND		0.20
Dibromochloromethane	ND		0.20
1,2-Dibromoethane	ND		0.20
Chlorobenzene	ND		0.20
1,1,1,2-Tetrachloroethane	ND		0.20
Bromoform	ND		1.0
Bromobenzene	ND		0.20
1,1,2,2-Tetrachloroethane	ND		0.20
1,2,3-Trichloropropane	ND		0.20
2-Chlorotoluene	ND		0.20
4-Chlorotoluene	ND		0.20
1,3-Dichlorobenzene	ND		0.20
1,4-Dichlorobenzene	ND		0.20
1,2-Dichlorobenzene	ND		0.20
1,2-Dibromo-3-chloropropane	ND		1.0
1,2,4-Trichlorobenzene	ND		0.20
Hexachlorobutadiene	ND		0.20
1,2,3-Trichlorobenzene	ND		0.20
	Percent	Control	
Surrogate	Recovery	Limits	
Dibromofluoromethane	92	71-126	
Toluene, d8	93	76-116	
4-Bromofluorobenzene	92	70-123	

Date of Report: June 29, 2007
 Samples Submitted: June 22, 2007
 Laboratory Reference: 0706-222
 Project: 650-001

**HALOGENATED VOLATILES by EPA 8260B
 SB/SBD QUALITY CONTROL**

Date Extracted: 6-22-07
 Date Analyzed: 6-22-07

Matrix: Water
 Units: ug/L (ppb)

Lab ID: SB0622W1

Compound	Spike Amount	SB	Percent Recovery	SBD	Percent Recovery	Recovery Limits	Flags
1,1-Dichloroethene	10.0	9.15	92	9.19	92	70-130	
Benzene	10.0	9.46	95	9.51	95	70-130	
Trichloroethene	10.0	8.87	89	9.02	90	70-116	
Toluene	10.0	9.75	98	9.76	98	76-119	
Chlorobenzene	10.0	9.15	92	9.22	92	77-112	

	RPD	RPD Limit	Flags
1,1-Dichloroethene	0	20	
Benzene	1	16	
Trichloroethene	2	16	
Toluene	0	15	
Chlorobenzene	1	15	



Data Qualifiers and Abbreviations

A - Due to a high sample concentration, the amount spiked is insufficient for meaningful MS/MSD recovery data

B - The analyte indicated was also found in the blank sample

C - The duplicate RPD is outside control limits due to high result variability when analyte concentrations are within five times the quantitation limit

E - The value reported exceeds the quantitation range and is an estimate

F - Surrogate recovery data is not available due to the high concentration of coeluting target compounds

H - The analyte indicated is a common laboratory solvent and may have been introduced during sample preparation, and be impacting the sample result

I - Compound recovery is outside of the control limits

J - The value reported was below the practical quantitation limit The value is an estimate.

K - Sample duplicate RPD is outside control limits due to sample inhomogeneity The sample was re-extracted and re-analyzed with similar results.

L - The RPD is outside of the control limits.

M - Hydrocarbons in the gasoline range are impacting the diesel range result.

M1 - Hydrocarbons in the gasoline range (toluene-naphthalene) are present in the sample.

N - Hydrocarbons in the lube oil range are impacting the diesel range result.

O - Hydrocarbons indicative of heavier fuels are present in the sample and are impacting the gasoline result

P - The RPD of the detected concentrations between the two columns is greater than 40.

Q - Surrogate recovery is outside of the control limits

S - Surrogate recovery data is not available due to the necessary dilution of the sample.

T - The sample chromatogram is not similar to a typical _____.

U - The analyte was analyzed for, but was not detected above the reported sample quantitation limit.

U1 - The practical quantitation limit is elevated due to interferences present in the sample.

V - Matrix Spike/Matrix Spike Duplicate recoveries are outside control limits due to matrix effects

W - Matrix Spike/Matrix Spike Duplicate RPD are outside control limits due to matrix effects

X - Sample extract treated with a mercury cleanup procedure

Y - Sample extract treated with an acid/silica gel cleanup procedure

Z -

ND - Not Detected at PQL

PQL - Practical Quantitation Limit

RPD - Relative Percent Difference



Chain of Custody

Laboratory Number: **06-222**

Requested Analysis

Turnaround Request (in working days)

(Check One)

Same Day 1 Day

2 Day 3 Day

Standard (7 working days)
(TPH analysis 5 working days)

_____ (other)

Company: Farallon

Project Number: 06-650605-001

Project Name: Cleaning Center of Redmond

Project Manager: J. Lyr

Sampled by: D. Clement

NWTPH-HCID	NWTPH-Gx/BTEX	NWTPH-DX	Volatiles by 8260B	Halogenated Volatiles by 8260B	Semivolatiles by 8270C	PAHs by 8270C / SIM	PCBs by 8082	Pesticides by 8081A	Herbicides by 8151A	Total RCRA Metals (8)	TCLP Metals	HEM by 1664	VPH	EPH	% Moisture
				X											

Lab ID	Sample Identification	Date Sampled	Time Sampled	Matrix	# of Cont.
1	MW10-GW062207	6/22/07	0905	W	3

Signature	Company	Date	Time	Comments/Special Instructions:
Relinquished by: <u>D. Clement</u>	<u>Farallon</u>	<u>6/22/07</u>		
Received by: <u>M. Young</u>	<u>OSE</u>	<u>6/22/07</u>	<u>933</u>	
Relinquished by:				
Received by:				
Relinquished by:				
Received by:				
Reviewed by/Date:	Reviewed by/Date:	Chromatograms with final report <input type="checkbox"/>		

APPENDIX C
WASHINGTON STATE DEPARTMENT OF ECOLOGY MEMORANDUM

SITE CLOSURE REPORT ADDENDUM
Former Cleaning Center of Redmond
15796 Redmond Way
Redmond, Washington

Farallon PN: 650-001

Developing Conditional Points of Compliance at MTCA Sites Where Groundwater Discharges to Surface Water

Implementation Memorandum No. 16

Date: December 2016

To: Interested Persons

From: Jeff Johnston, Manager
Information & Policy Section
Toxics Cleanup Program

Contacts: Jerome Cruz, Hydrogeologist, jerome.cruz@ecy.wa.gov, 425.649.7094
Northwest Regional Office, Toxics Cleanup Program

Mark Adams, Hydrogeologist, mark.adams@ecy.wa.gov, 425.649.7107
Northwest Regional Office, Toxics Cleanup Program

Attachments: None

Accommodation Requests: To request ADA accommodation including materials in a format for the visually impaired, call Ecology's Toxics Cleanup Program at 360-407-7170. Persons with impaired hearing may call Washington Relay Service at 711. Persons with speech disability may call TTY at 877-833-6341.

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Acronyms and Abbreviations

AKART	all known available and reasonable methods of treatment
CPOC	conditional point of compliance
CULs	cleanup levels
Ecology	Washington State Department of Ecology
GW	groundwater
MNA	monitored natural attenuation
MTCA	Model Toxics Control Act
NPDES	National Pollution Discharge Elimination Systems
PLP	potentially liable person
POC	point of compliance
RCW	Revised Code of Washington
SW	surface water
TCP	Toxics Cleanup Program
WAC	Washington Administrative Code

1.0. Purpose and Applicability

This memorandum provides guidance from the Washington State Department of Ecology (Ecology) for setting conditional points of compliance for groundwater at contaminated sites where a contaminant plume is discharging, or could discharge, to surface water. The memorandum describes **when** and **where** groundwater conditional points of compliance may be set, and briefly touches on **how** compliance can be measured. A point of compliance (POC) is the location where cleanup levels must be attained at a contaminated site.

The requirements for setting groundwater points of compliance are specified in WAC 173-340-720(8). Points of compliance must be identified and evaluated during the feasibility study and established in the cleanup action plan (WAC 173-340-350(8)(c)(i)(F) and 173-340-380(1)(a)(iv)).

This memorandum applies to contaminated sites cleaned up under RCW 70.105D, Model Toxics Control Act (MTCA), and its implementing regulations, WAC 173-340 (MTCA rule). It is intended for use by Ecology cleanup project managers, local governments, environmental consultants, and others who are involved in the cleanup process under MTCA.

1.1 Terminology

Typically, before groundwater discharges into surface water, it enters into a transitional zone in the aquifer where some mixing of groundwater and surface water occurs. This zone of mixed waters (located within the aquifer and sediments before groundwater enters surface water) will be referred to in this document as the **transitional zone** (see Figure 1). Note that the transitional zone also includes (or is equivalent to) the **hyporheic zone** in fluvial settings, and usually includes **sediment porewater** in saturated sediment.

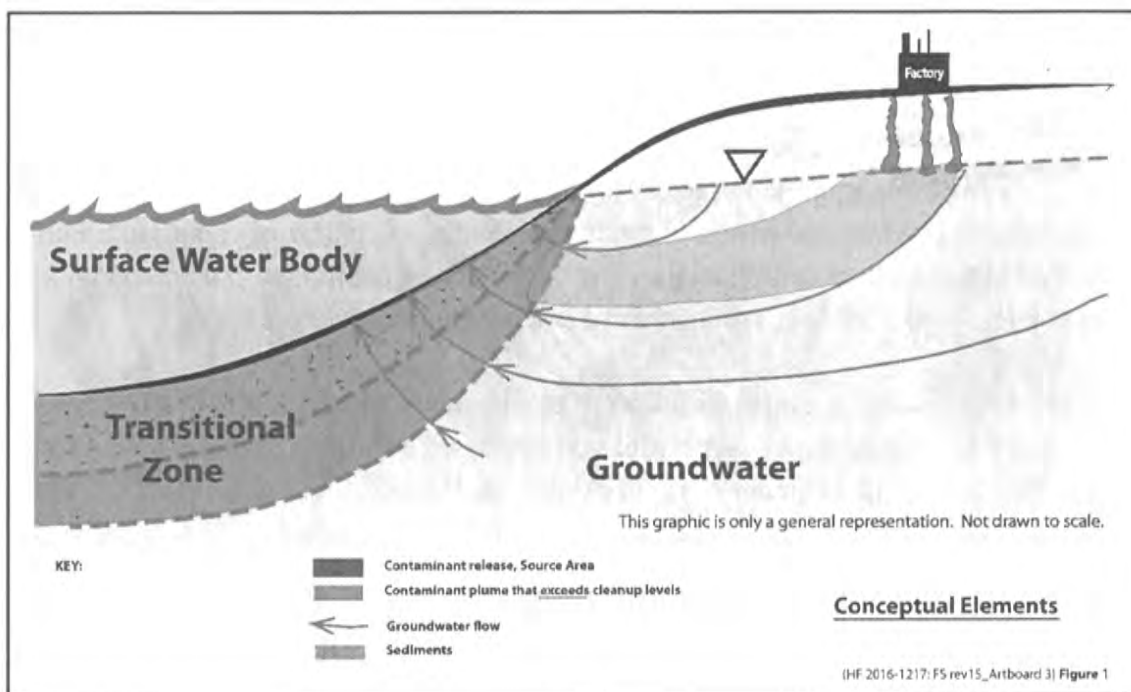


Figure 1: Conceptual elements of the groundwater to surface water pathway at a site.

PHYSICAL SETTING DEFINITIONS

Transitional zone: In an aquifer, this is the area where groundwater has mixed with surface water. Beneath a stream, this area is often called the **hyporheic zone**.

Mixing zone: Outside an aquifer and within a body of surface water, this is where a plume has discharged into, and is mixing with, the water column. This term has a specific regulatory meaning described in the paragraph below this box.

Surface water/Surface water body: Any significant accumulation of water on the surface of the earth such as a stream, river, lake, reservoir, or wetland; coastal waters; or an ocean. This does not include the water in saturated sediment or native material underlying and surrounding a body of surface water.

Sediment porewater: Interstitial water in sediment. “Sediment” here refers to the definition in the Sediment Management Standards: *“Surface sediments” or “sediment(s)” means, except for purposes of Part V of this chapter, settled particulate matter located in the predominant biologically active aquatic zone, or exposed to the water column. Sediment(s) also includes settled particulate matter exposed by human activity (e.g., dredging) to the biologically active aquatic zone or to the water column.* (WAC 173-204-200(24))

Mixing in the transitional zone is not to be confused with mixing that occurs in the water column in a body of surface water. The latter is related to a concept established under the Water Quality Standards for Surface Waters of the State of Washington (WAC 173-201A), which is associated with permitting surface water discharge through the National Pollution Discharge Elimination System (NPDES). Under WAC 173-201A, the mixing zone refers to that portion of a surface water body adjacent to an effluent outfall where mixing results in dilution of the effluent within the receiving water. The mixing zone associated with NPDES regulations is not the topic of this memorandum.

1.2 Standard and Conditional Points of Compliance Defined

The **standard point of compliance (POC)** for groundwater under MTCA is defined as "...throughout the site from the uppermost level of the saturated zone to the lowest depth potentially affected by the site." (WAC 173-340-720(8)(b)) (see Figure 2). The definition implies that contaminated groundwater at a site will attain cleanup levels throughout the site within a reasonable restoration time frame.

For some cleanups, however, it can be demonstrated that it is not practicable to meet groundwater cleanup levels at the standard POC within a reasonable restoration time frame. In this case, Ecology may approve a **conditional POC (CPOC)**. The CPOC must not exceed the property boundary, except under the following three off-property situations:

- Source property abutting surface water;
- Source property near, but not abutting,¹ surface water; or
- Source property located in an area with "area-wide" contamination.

In this memorandum:

- **Abutting** is defined as a source property that borders a surface water body, with the property boundary being either at the shoreline or in the water body.
- **Near, but not abutting** is defined herein as a source property that is separated from a water body by one or more other properties.
- **Area-wide** is defined as the source property being located within a broader area affected by co-mingled plumes from multiple sources.

¹ There is no set distance by which a site may be defined as "near, but not abutting" surface water. This provision is interpreted to mean that, based on technical data specific to the site, the contaminated groundwater at the site reaches, or is likely to reach, surface water at detectable concentrations.

The following sections detail when and where conditional points of compliance can be set where groundwater and surface water interactions occur. Note that this memorandum does not address situations with area-wide contamination.

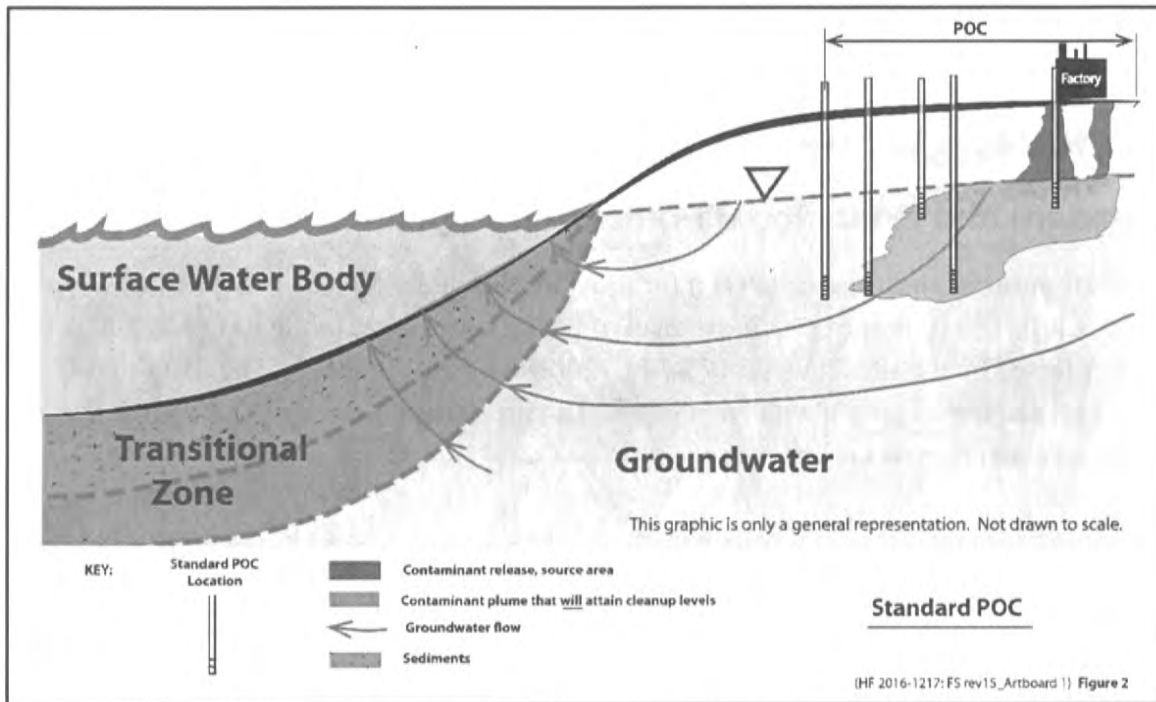


Figure 2: Schematic of a standard point of compliance.

2.0. When may a conditional point of compliance be set?

2.1. On-Property Conditional Points of Compliance

As noted in Section 1.2, when it can be demonstrated that it is not practicable to meet groundwater cleanup levels at the standard point of compliance within a reasonable restoration time frame, Ecology may approve a conditional point of compliance within or at a property boundary. The demonstration must be made in accordance with the remedy selection requirements in WAC 173-340-350 through 173-340-390 (WAC 173-340-720(8)(c)). In other words, a CPOC may be set only when the selected remedy will result in some areas of contaminated groundwater remaining at the site for a period of time considered to be longer than reasonable.

When a CPOC is proposed, the person responsible for undertaking the cleanup action must demonstrate that all practicable methods of treatment are to be used in the cleanup (WAC 173-340-720(8)(c)).

2.2. Off-Property Conditional Points of Compliance

A conditional point of compliance may be set beyond the property boundary in the following three specific situations as noted previously, subject to several conditions specified in WAC 173-340-720(8)(d).

2.2.1 Source property abuts surface water

When the groundwater cleanup level is based on protection of surface water beneficial uses, and the property containing the source of contamination abuts surface water, then Ecology may approve an off-property CPOC, subject to the following conditions (WAC 173-340-720(8)(d)(i)).

1. The conditions for an on-property CPOC in WAC 173-340-720(8)(c), described in Section 2.1 above.
2. The following additional conditions, specified in WAC 173-340-720(8)(d)(i):
 - A. It has been demonstrated that contaminated groundwater is entering, and will continue to enter, the surface water body even after the selected remedial alternative is implemented. Note that this provision does not define “contaminated ground water” as meaning an exceedance of cleanup levels;

- B. It has been demonstrated under the remedy selection requirements in WAC 173-340-350 through 173-340-390 that it is not practicable to meet cleanup levels in groundwater before entering surface water within a reasonable restoration time frame. This means that the selected remedy will result in contaminated groundwater continuing to discharge into surface water;
- C. Use of a mixing zone under WAC 173-201A-100 to demonstrate compliance with surface water cleanup levels shall not be allowed. Although Washington State's Water Quality Standards for Surface Waters allows it for NPDES permitting (for example), MTCA does not allow using a mixing zone within the surface water body (i.e., water column) to demonstrate compliance;
- D. Groundwater discharges must be provided with "all known available and reasonable methods of treatment" (AKART) prior to release. Guidance for conducting an AKART analysis is presented in Ecology's *Water Quality Program Permit Writer's Manual* (Ecology 2015). Establishing AKART is generally **more stringent** than determining an alternative that is "permanent to the maximum extent practicable" under MTCA;
- E. Groundwater discharges must² not result in violations of sediment quality values;
- F. Groundwater and surface water monitoring must be performed to assess long-term performance of the selected cleanup action. This includes the potential for bioaccumulation problems resulting from surface water concentrations below method detection limits. As noted on page 201 of Responsiveness Summary for the Amendments to MTCA (Ecology 1991), if monitoring indicates a potential problem, the point of compliance may need to be moved back up into the groundwater system; and
- G. Before approving the CPOC, a notice of the proposal shall be mailed to the natural resource trustees, the Washington Department of Natural Resources, and the United States Corps of Engineers. The notice shall invite comments, and is in addition to notices required under WAC 173-340-600 (public involvement).

² In this section of the WAC, MTCA uses the term "shall" which is formal and is interpreted to mean the person or entity has a duty or obligation to perform a certain act. The word "must" is used here interchangeably.

These requirements, taken as a whole, set a very high bar for approving off-property CPOCs in a shoreline setting.

POLICY HIGHLIGHT

When read by themselves, the conditions for allowing a CPOC for properties abutting surface water (WAC 173-340-720(8)(d)(i)(A–G)) would appear to apply only if Ecology decides to approve a CPOC located within the surface water. However, in the section regarding *properties near, but not abutting, surface water* (WAC 173-340-720(8)(d)(ii)), the regulation requires that the conditions specified in WAC 173-340-720(8)(d)(i) must also be met.

Implicit in these two sets of nearly identical requirements is the idea that they would also apply to a third possibility for the abutting situation—a CPOC located not in surface water, but further upgradient in groundwater.

Therefore, the conditions in WAC 173-340-720(8)(d)(i)(A–G) are interpreted to be a requirement for both *abutting* and *near, but not abutting* properties, irrespective of where the CPOC is set.

2.2.2 Source property near, but not abutting surface water

When the groundwater cleanup level is based on protection of surface water beneficial uses and the property containing the source of contamination is located near, but not abutting surface water, then Ecology may approve an off-property CPOC, subject to all three of the following conditions (WAC 173-340-720(8)(d)(ii)).

1. The conditions for an on-property CPOC in WAC 173-340-720(8)(c), described in Section 2.1 above.
2. The conditions for an off-property CPOC in WAC 173-340-720(8)(d)(i), described in Section 2.2.1 above.
3. The following additional condition:
 - A. The affected property owners between the source of contamination and the surface water body must agree in writing to using the CPOC. Affected properties means non-PLP (potentially liable person) properties that are located between the source property and the proposed CPOC. Agreement from properties downgradient of the CPOC would not be needed, because they would not be affected.

2.2.3 Source property located in area-wide groundwater contamination

Ecology may establish an area-wide CPOC in accordance with WAC 173-340-720(8)(d)(iii). As noted previously, this memorandum does not address off-property CPOCs for area-wide situations due to the difficulty of addressing it within a groundwater to surface water discharge setting.

3.0. Where should a conditional point of compliance be set?

3.1 Location of On-Property Conditional Point of Compliance

An on-property CPOC must be set as close as practicable to the contamination source, not to exceed the property boundary (WAC 173-340-720(8)(c)). Figure 3 below illustrates two potential locations for an on-property CPOC.

POC 1 is set in “clean” water at the downgradient edge of the contaminant plume. POC 1 would be used if none of the plume is expected to attain cleanup levels in a reasonable restoration time. Having POC 1 just outside the plume provides a location where cleanup levels can be attained.

POC 2 is set within the plume. POC 2 would be used if the distal portion of the plume is expected to attain cleanup levels within a reasonable restoration time frame.

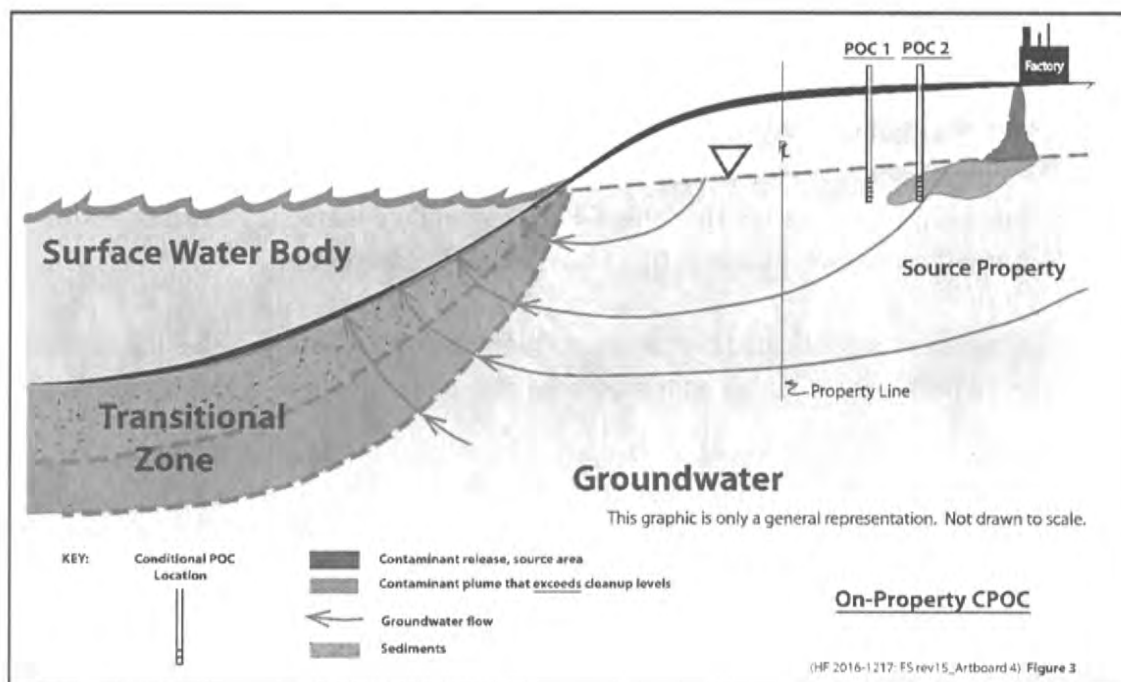


Figure 3: Schematic of an on-property conditional point of compliance (CPOC).

3.2. Location of Off-Property Conditional Point of Compliance

As discussed in Section 2.2, a CPOC may be set beyond the property boundary in three specific situations. This section discusses where to set the POC in two of those situations.

3.2.1 Source property abuts surface water

For sites where the property containing the source of contamination abuts surface water, a CPOC may be set within the surface water as close as technically possible to the point or points where groundwater flows into the surface water (WAC 173-340-720(8)(d)(i)). This means that the CPOC may be set as far into surface water as the base of the water column and directly on top of sediments, if technically possible.

However, the POC must be set further upgradient, within the sediment porewater or aquifer (including within the transitional zone), if conditions allow to meet the fundamental MTCA requirement that a CPOC be set as close as practicable to the source of contamination.

Figures 4a and 4b present two primary discharge scenarios. Figure 4a shows potential point of compliance locations when a contaminant plume exceeding cleanup levels is discharging into surface water. As illustrated, two potential CPOC location scenarios are presented: one in surface water (CPOC 1) and a second further upgradient (CPOC 2).

CPOC 1 is predicated on the assumption that, despite application of the selected remedy and AKART, groundwater within the existing leading edge of the plume discharging to the surface water body is not realistically expected to achieve compliance with cleanup levels in a reasonable restoration time frame. **Locating this CPOC in surface water is conditioned on whether it is technically possible, and is subject to Ecology's discretion.**

The second CPOC location is predicated on the assumption that groundwater at this location will meet cleanup levels within a reasonable restoration time frame. It may or may not be within the transitional zone.

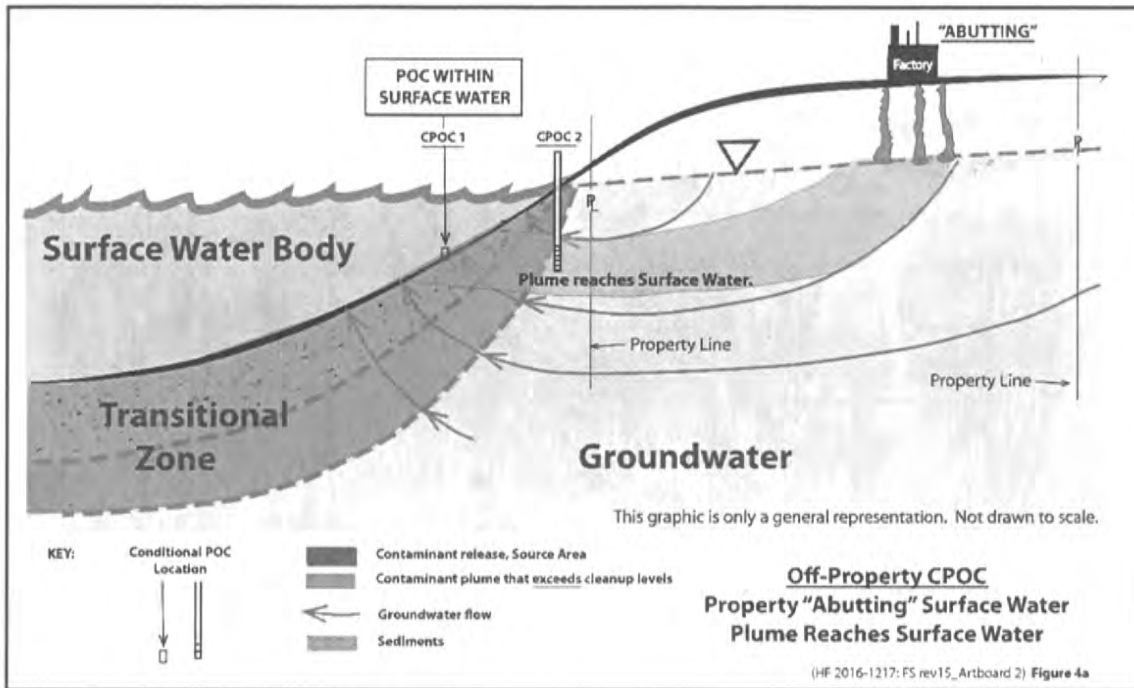


Figure 4a: Off-property conditional point of compliance (CPOC) on property abutting surface water and where the plume has reached the surface water body.

Figure 4b on the next page shows a different situation where groundwater above cleanup levels is not reaching surface water. In this case, there is still the possibility of alternative CPOC locations. Two are shown in the figure. One (CPOC 1) is located within the transitional zone (not surface water) downgradient of the area that exceeds cleanup levels. The second alternative (CPOC 2) is located further upgradient, again predicated on the assumption that groundwater at this location will meet cleanup levels within a reasonable restoration time frame. It may or may not be within the transitional zone.

3.2.2 Source property near, but not abutting surface water

There are three location requirements for this setting. The first two requirements are that 1) the CPOC must be set as close as practicable to the source, and 2) it cannot exceed the point or points where the groundwater flows into the surface water (WAC 173-340-720(8)(d)(ii)). This means that the CPOC may not be set within the surface water body. The farthest downgradient that the CPOC may be set is within the sediment porewater/groundwater within the transitional zone.

The third requirement is that if the groundwater cleanup level is not exceeded in the groundwater prior to its entry into the surface water, the CPOC cannot extend beyond the extent of groundwater contamination above cleanup levels at the time Ecology approves the CPOC (WAC 173-340-720(8)(d)(ii)). This means that the CPOC may not be set further downgradient than the tip of the plume exceeding the cleanup level at that time.

Note that unlike the abutting case, locating this CPOC is not conditioned on whether it is technically possible. Approval of the CPOC location is subject to Ecology's discretion.

Figure 5a on the following page shows a site where the contaminants exceeding cleanup levels reach surface water. The first CPOC (CPOC 1) represents the furthest point downgradient where the CPOC may be set. The second CPOC (CPOC 2) represents a potential location closer to the source where it is practicable to attain cleanup levels within a reasonable restoration time period.

Figure 5b illustrates a situation where the groundwater cleanup level is not exceeded in the groundwater prior to its entry into the surface water. In this case, as noted previously, the CPOC may not extend beyond the tip of the plume.

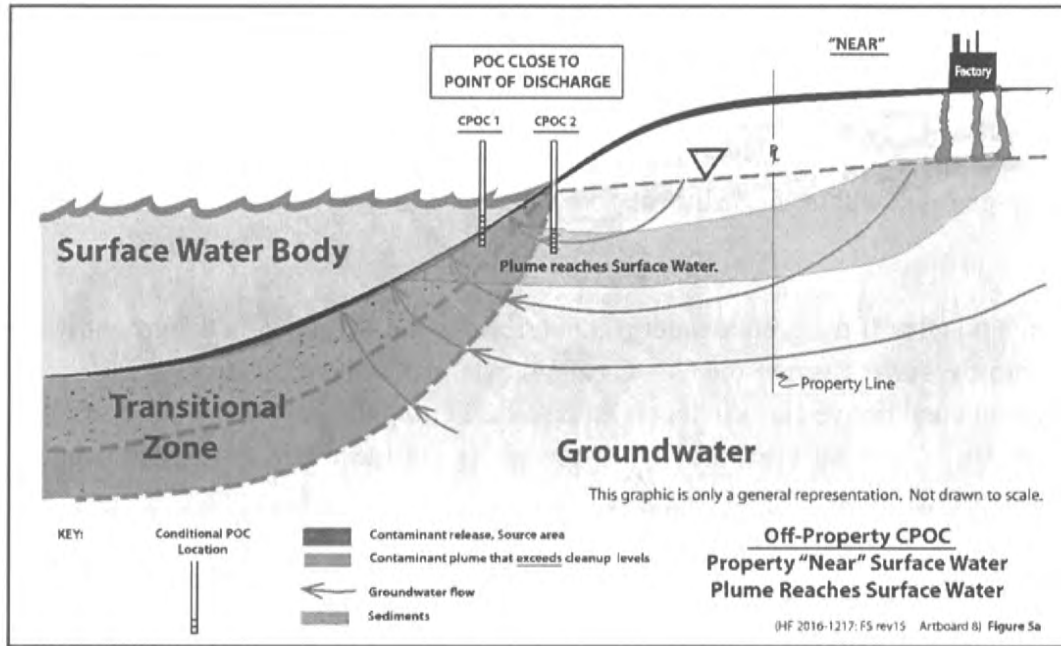


Figure 5a (above): Off-property conditional point of compliance (CPOC) on property near (but not abutting) surface water and where plume has reached the surface water body.

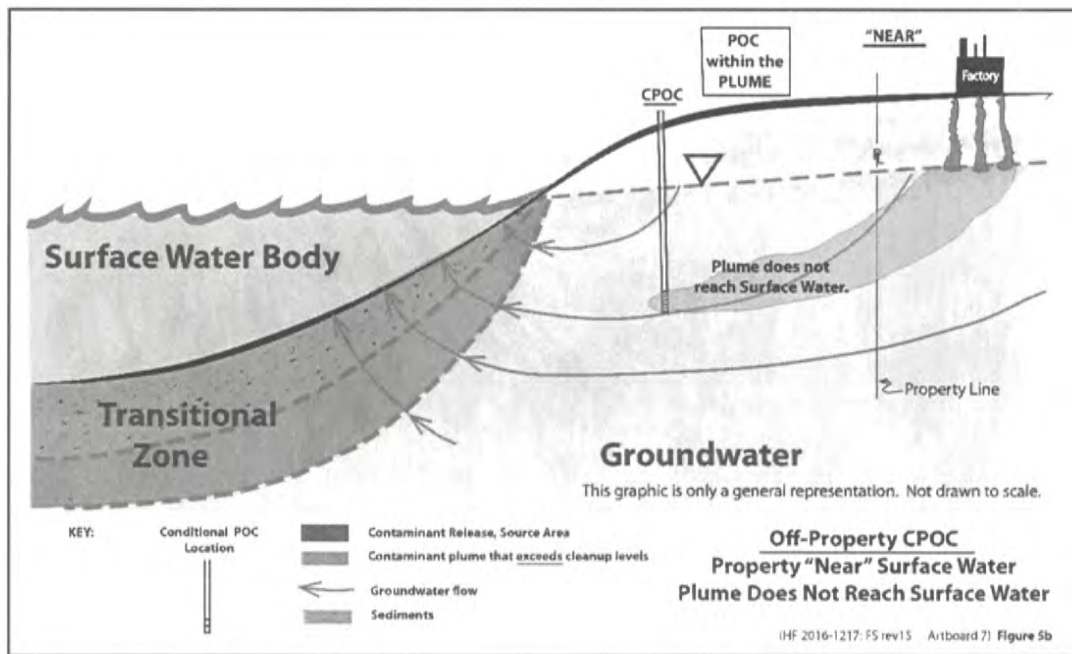


Figure 5b: Off-property conditional point of compliance (CPOC) on property near (but not abutting) surface water and where plume has not reached the surface water body.

POLICY HIGHLIGHT

The MTCA regulations addressing off-property CPOCs appear to focus on extreme downgradient locations. The requirements for *abutting* properties focus on a CPOC in surface water; the requirements for *near, but not abutting*, properties focus on a CPOC at the edge of groundwater just before it enters surface water. **This focus on extremes can be misleading to cleanup project managers when they are deciding whether to allow and where to locate an off-property CPOC.**

Locating any POC begins in the Feasibility Study, wherein an estimate is made of where groundwater will meet cleanup levels within a reasonable restoration time frame for each cleanup alternative being evaluated (WAC 173-340-350(8)(c)(i)(F)).

Actual selection of a CPOC location then typically occurs in the Cleanup Action Plan. Here, the process begins by confirming the area where groundwater is expected to meet cleanup levels in a reasonable restoration time frame for the selected remedy. The CPOC must then be located as far upgradient as possible to meet the MTCA requirement that a CPOC be set as close as possible to the source of the hazardous substances. In many cases this will be within a property.

If, however, the CPOC must be located off-property in a groundwater discharge setting, the requirement that it be set as close as possible to the source of hazardous substances still applies.

This means that an off-property CPOC will likely not be set at the extreme locations allowed in the MTCA regulations, but further upgradient where the groundwater will attain cleanup levels in a reasonable restoration time frame.

3.3. Further Considerations on Setting Conditional Points of Compliance in a Groundwater Discharge Setting

As previously discussed, MTCA allows off-property conditional points of compliance to be set in discharge settings under certain conditions. These settings are often high-energy environments and geochemically complex. In such situations, establishing a monitoring network that can be sampled routinely over multiple years can be challenging. Additionally, the margin for error can be very slim and the corresponding potential risk high, with compliance being potentially measured within a few inches of the receiving water body.

For these reasons, when deciding whether to approve a groundwater CPOC in a discharge setting as part of a cleanup action, the cleanup project manager should consider whether it is practical, reliable, and protective. Some of the factors that should be considered are highlighted in Table 1.

Table 1: Factors that should be considered when evaluating practicality, reliability, and protectiveness.

Factors to Consider When Evaluating Practicality, Reliability, and Protectiveness	
Challenge	Description
Uncertainty about being able to physically obtain reliable data	In some situations, powerful wave or tidal activity; strong currents; or physical barriers such as riprap or bulkheads, can make it very difficult to obtain reliable data from near a shoreline.
Uncertainty about proximity to receptors	In some situations, there may be uncertainty about the type and sensitivity of benthic organisms that are present in sediment, or the depth to which they burrow. This results in uncertainty about whether benthic species are being protected adequately and whether risk is adequately minimized.
Uncertainty about plume discharge concentrations	Contaminant levels in a groundwater plume can vary significantly over time (contaminant mass flux). Hydrologic conditions at the point of discharge are also variable. If one or both of these situations occur, it may not be possible to establish a monitoring schedule at surface water or sediment porewater CPOCs that can be relied upon to show that discharge concentrations are being continuously protective. Areas where this might be a concern include shoreline interfaces influenced by tidal action, power dams with variable releases, or variable irrigation flows.
Uncertainty about chemical transformations in the transition zone	Dissolved contaminants passing through the transition zone are likely to be transformed to some degree through either geochemical or biologically mediated processes, especially in tidally influenced aquifers. These processes can result in new precipitates and new daughter products. The end result may be protective or detrimental to receptors of concern.
Complexity of monitored natural attenuation (MNA)	If MNA is the selected remedy, and if a CPOC is established in the transitional zone, it may be difficult to demonstrate that contaminant reduction is due primarily to biodegradation, given that other processes are also acting to reduce contaminant concentrations (dilution, adsorption volatilization, etc.).

Cleanup project managers must be certain that a CPOC at the point of discharge is not only acceptable from a regulatory standpoint, but also functional and reliable given the specific circumstances at a particular site. Because there is always some uncertainty in knowing if future compliance can be demonstrated or achieved through a shoreline monitoring system, it is recommended that CPOCs be moved upgradient of the point of discharge/transitional zone as far as possible. If the situation is particularly problematic, the cleanup project manager should consider other ways to monitor compliance (e.g., attenuation studies, or transport and fate modeling), or to augment the remedy.

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4.0. Monitoring Conditional Points of Compliance Using Upland Wells

Compliance is typically measured by obtaining samples at the CPOC and comparing sample results to cleanup levels.

However, the MTCA rule also allows using groundwater monitoring wells upgradient of a CPOC to measure compliance in a groundwater to surface water discharge setting. Specifically, the MTCA rule states that:

...[t]he department may require or approve the use of upland monitoring wells located between the surface water and the source of contamination to establish compliance where a conditional point of compliance has been established under subsection (8)(d)(i) or (ii) of this section. (WAC 173-340-720(8)(e)).

In this situation, an estimate of natural attenuation between the upland well and the CPOC is necessary in order to demonstrate that groundwater at the POC meets cleanup levels. MTCA states this requirement as follows:

Where such monitoring wells are used, the department should consider an estimate of natural attenuation between the monitoring well and the point or points where ground water flows into the surface water in evaluating whether compliance has been achieved. (WAC 1730340-720(8)(e)(ii)).

In evaluating how much natural attenuation will occur, other factors need to be considered, including:

- Whether groundwater could reach surface water in ways that would not provide the expected natural attenuation (e.g. short-circuiting through utility trenches and seeps); and
- Whether changes in groundwater chemistry due to natural attenuation would cause an exceedance of surface water or sediment quality standards.

Because using upland wells for compliance monitoring purposes requires extrapolation, it is recommended that actual data be obtained from the point of compliance to confirm the accuracy of the natural attenuation estimate.

5.0. Summary

The following flowchart (Figure 6) summarizes and assists with setting a CPOC along the groundwater to surface water pathway.

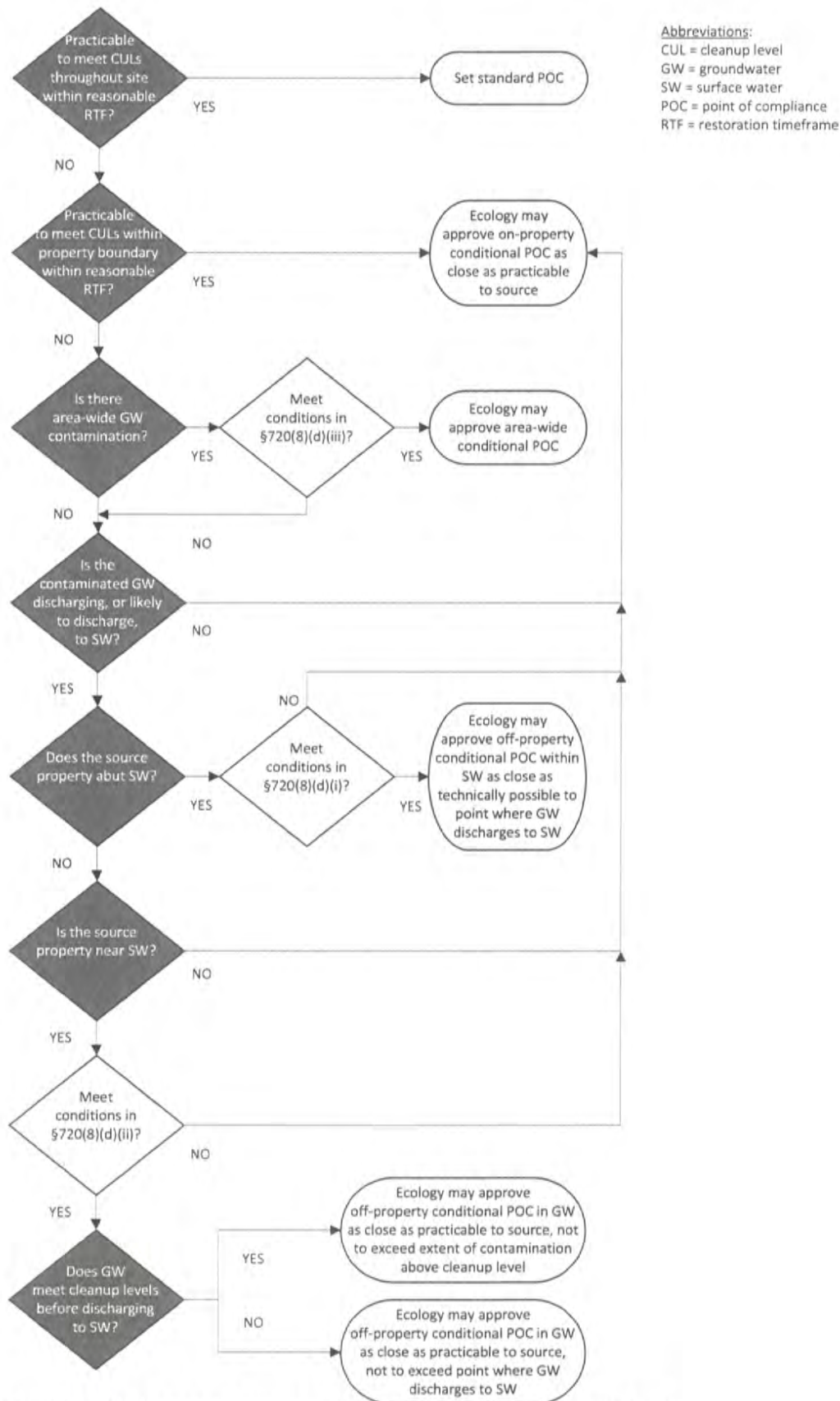


Figure 6: Flow chart for setting points of compliance for groundwater

6.0. References

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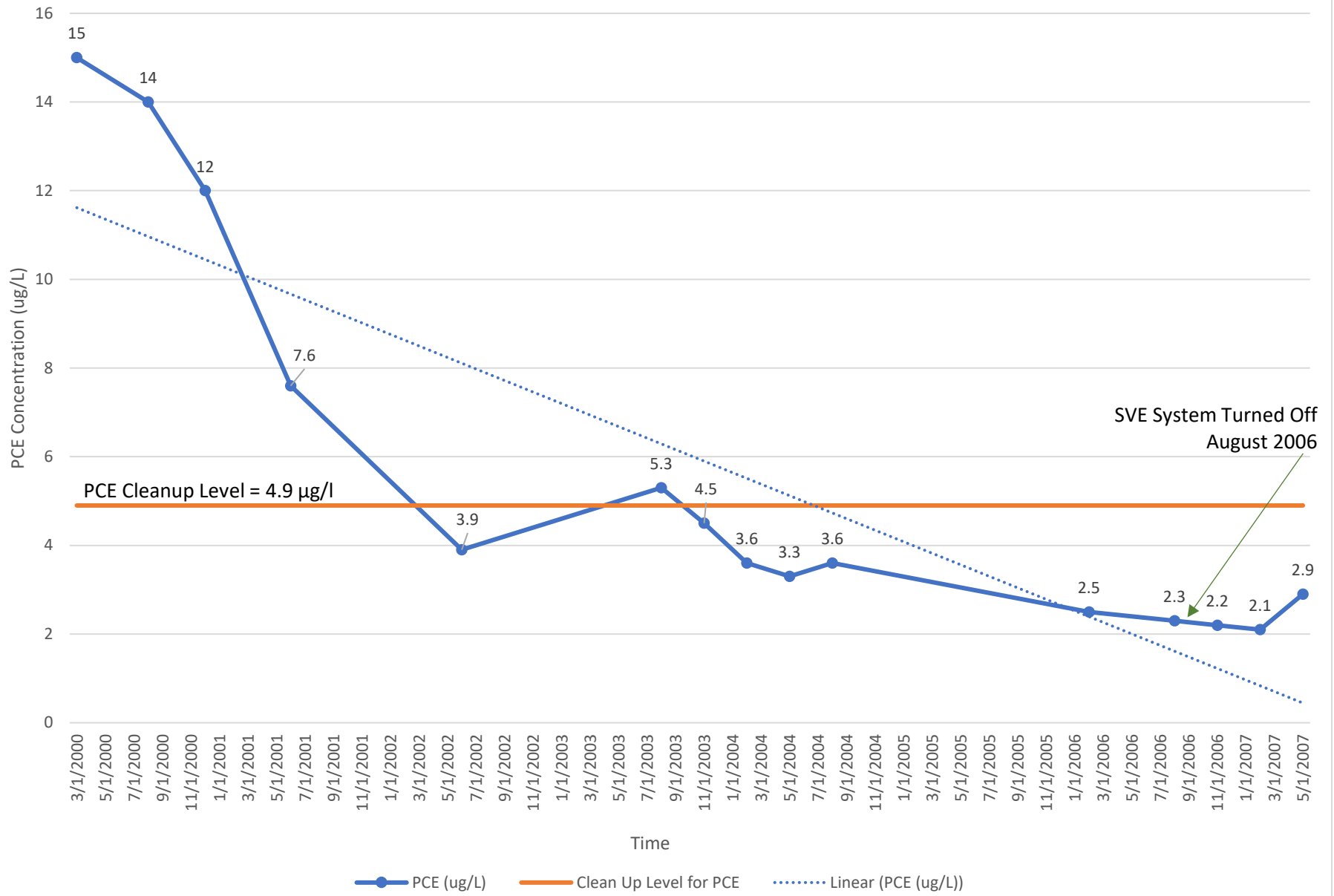
<http://apps.leg.wa.gov/wac/default.aspx?cite=173-201A>

APPENDIX D
CONCENTRATION VS. TIME CHARTS FOR PCE IN GROUNDWATER

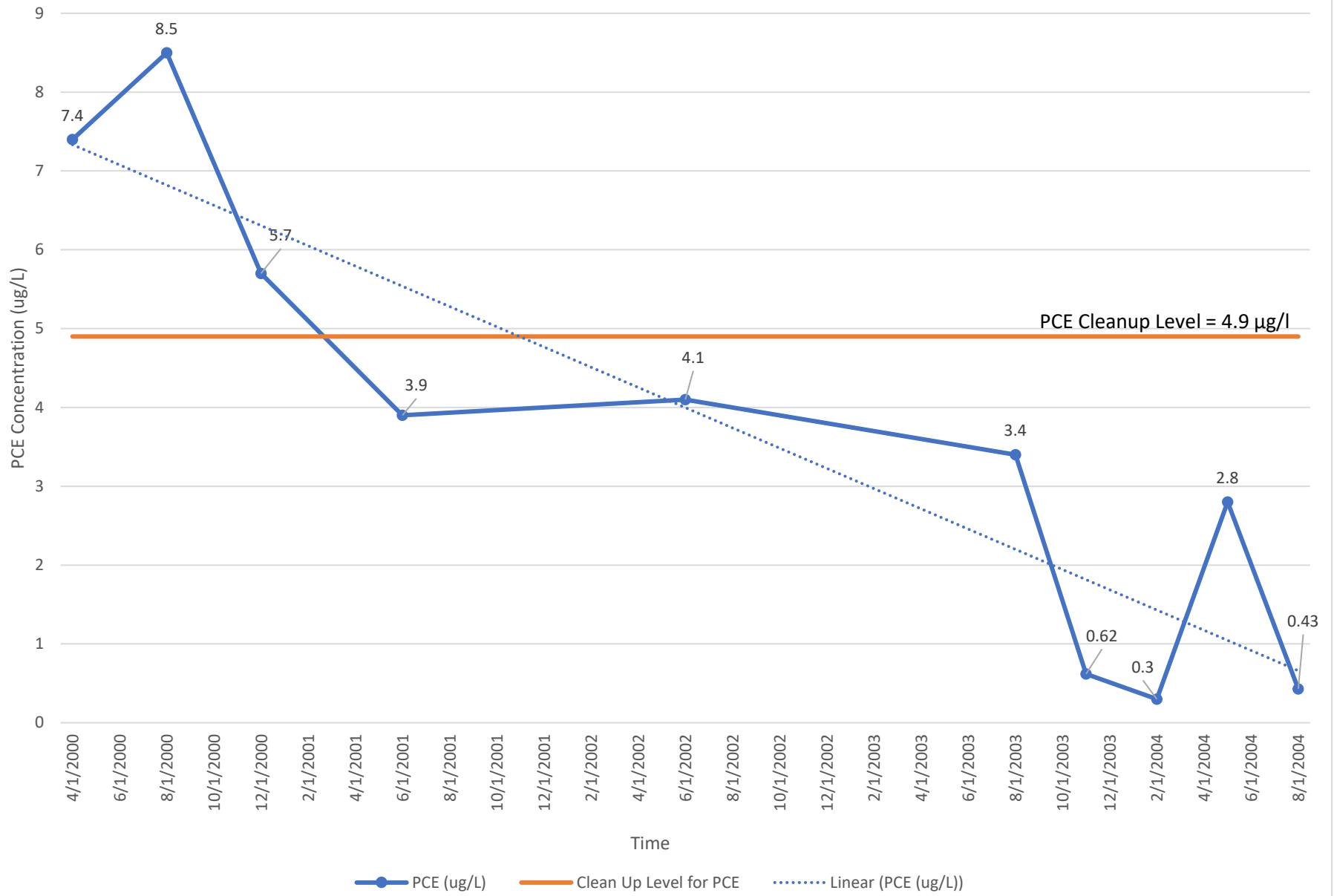
SITE CLOSURE REPORT ADDENDUM
Former Cleaning Center of Redmond
15796 Redmond Way
Redmond, Washington

Farallon PN: 650-001

PCE Concentration vs. Time at Former Monitoring Well MW-7



PCE Concentration vs. Time at Former Monitoring Well MW-8



PCE Concentration vs. Time at Former Monitoring Well MW-9

