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FEASIBILITY STUDY

CHS AUBURN SITE
AUBURN, WASHINGTON

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For:
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August 6, 2014

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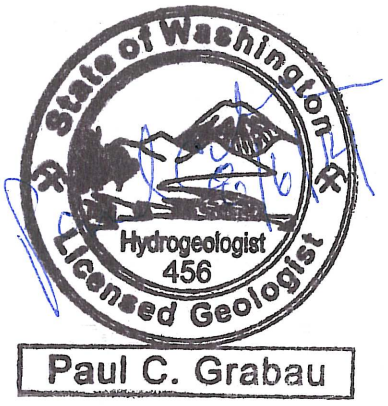

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Quality Service for Environmental Solutions

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ACRONYMS AND ABBREVIATIONS

AS	air sparging
ASTs	aboveground storage tanks
bgs	below ground surface
BTEX	benzene, toluene, ethylbenzene, and xylenes
Cenex	Cenex Supply and Marketing, Inc.
CHS	CHS Inc.
COCs	constituents of concern
DRO	total petroleum hydrocarbons as diesel-range organics
Ecology	Washington State Department of Ecology
Farallon	Farallon Consulting, L.L.C.
FS	Feasibility Study
GRO	total petroleum hydrocarbons as gasoline-range organics
LNAPL	light nonaqueous-phase liquid
mg/kg	milligrams per kilogram
µg/l	micrograms per liter
MTCA	Washington State Model Toxics Control Act Cleanup Regulation
ORO	total petroleum hydrocarbons as oil-range organics
RI	Remedial Investigation
RI/FS	Remedial Investigation/Feasibility Study
Summit	Summit Envirosolutions, Inc.
SVE	soil vapor extraction
Thai Restaurant	Kong Thong Thai Restaurant
TPH	total petroleum hydrocarbons
USTs	underground storage tanks
WAC	Washington Administrative Code
WSIADA	Washington State Independent Auto Dealers Association

EXECUTIVE SUMMARY

Farallon Consulting, L.L.C. (Farallon) has prepared this Feasibility Study (FS) on behalf of CHS Inc. (CHS) for the CHS Auburn facility at 238 8th Street Southeast in Auburn, Washington and contiguous areas where concentrations of petroleum hydrocarbons and related compounds in soil or groundwater exceed the applicable cleanup levels from releases at the CHS Auburn facility (herein referred to as the Site). The cleanup action for the Site is being 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). The purpose of the FS is to develop and evaluate cleanup action alternatives to facilitate selection of a final cleanup action at the Site in accordance with WAC 173-340-350(8).

Cenex Supply and Marketing, Inc., a predecessor to CHS, entered into Agreed Order DE-94TC-N396 with the Washington State Department of Ecology (Ecology) on November 7, 1994. Agreed Order DE-94TC-N396 was subsequently terminated and replaced with Agreed Order No. 4033 entered into by CHS and Ecology with an effective date of June 12, 2007. Agreed Order No. 4033 specifies that CHS conduct a remedial investigation/feasibility study for the Site. The remedial investigation activities were completed in 2011 and the Remedial Investigation Report prepared by Farallon was submitted to Ecology in July 2011.

Environmental investigations were initiated at and in the vicinity of the Site following the 1987 discovery of petroleum hydrocarbon impacts to soil and groundwater on the former City of Auburn fire station property across Auburn Way South and approximately 400 feet in the direction of down-gradient groundwater flow from the CHS Auburn facility. Remedial activities began in 1994 and have continued through the present. More than 8,100 tons of petroleum-contaminated soil was excavated by CHS from the bulk fuel storage area on the CHS Auburn facility in 1998. The area of groundwater contamination has been reduced from the historical extent by over 90 percent and is present only in a limited area down-gradient of the existing air sparging system which is operating in the central portion of the Site.

Based on the observation of near-surface contamination during the 1998 excavation activities, leaks from underground piping, underground storage tanks, an oil-water separator, and possibly aboveground storage tanks in the bulk fuel storage area may have been the primary sources of petroleum hydrocarbon contamination to soil and groundwater at the Site. Following the interim action removal of soil from the bulk fuel storage area in 1998, the only areas of the Site where constituents of concern (COCs) have been detected in soil samples at concentrations exceeding MTCA Method A cleanup levels at depths of less than 15 feet below ground surface are on the CHS Auburn facility near the eastern and western limits of the bulk fuel storage area excavation and an isolated area near heating oil underground storage tank (UST) H-1 that was also removed from the CHS Auburn facility in 1998.

The COCs identified for the Site are total petroleum hydrocarbons as diesel-range organics, as gasoline-range organics, and as oil-range organics; and benzene, toluene, ethylbenzene, and xylenes. The affected media at the Site are soil and groundwater. The known or potential routes for contaminant migration at the Site include leaching from smear zone soil to groundwater, and lateral and vertical transport in groundwater. Soil above 15 feet below ground surface (bgs) does

not appear to be contributing petroleum hydrocarbon constituents via leaching to groundwater. Shallow groundwater is not used as a drinking water resource and does not discharge to surface water in the vicinity of the Site. Workers excavating soil near the limits of the 1998 excavation on the CHS Auburn facility or the area of heating oil UST H-1 could be exposed to COCs in soil. However, the current concentrations of COCs in soil above 15 feet bgs in these two areas is not known since the soil samples that exceeded MTCA Method A cleanup levels were collected in 1998. For protection of direct human contact with soil, the point of compliance will be soil throughout the Site from the ground surface to 15 feet bgs. For protection of groundwater, the point of compliance for soil will be soil throughout the Site from the surface to the depth of the water table. For groundwater, the point of compliance will be established throughout the Site from the uppermost level of the saturated zone extending vertically to the lowest depth that could potentially be affected by the Site.

As part of the FS, Farallon evaluated cleanup action alternatives for the Site with respect to the cleanup requirements set forth in MTCA. The FS considered the requirements under WAC 173-340-350, Site-specific conditions, and the criteria defined in WAC 173-340-360 for screening of potentially feasible cleanup action alternatives for the Site. Separate cleanup action alternatives were evaluated for groundwater and soil.

Following the alternatives screening process, the following three cleanup action alternatives for groundwater at the Site were retained for further consideration in the FS:

- Groundwater Cleanup Action Alternative 1—Monitored Natural Attenuation;
- Groundwater Cleanup Action Alternative 2—Enhanced Air Sparging with Targeted Soil Vapor Extraction; and
- Groundwater Cleanup Action Alternative 3—In-Situ Chemical Oxidation and Enhanced Bioremediation.

Following the alternatives screening process, the following two cleanup action alternatives for soil at the Site were retained for further consideration in the FS:

- Soil Cleanup Action Alternative 1—Institutional Controls; and
- Soil Cleanup Action Alternative 2—Excavation and Off-Site Disposal of Soil.

To determine whether the cleanup action alternatives for groundwater and soil provided permanent solutions to the maximum extent practicable, disproportionate cost analyses were performed in accordance with WAC 173-340-360(3)(e). To perform the disproportionate cost analyses, Farallon assigned values and weighting factors to each evaluation criterion defined in WAC 173-340-360(3)(f) to determine the overall MTCA benefit rankings. The protectiveness criterion received the highest weighting factor, followed by permanence and effectiveness over the long term, with the remaining criteria receiving the lowest weighting factors.

For the groundwater cleanup action alternatives, Alternative 2 was the least expensive and had the highest MTCA benefit ranking of the three alternatives evaluated, so no further analysis of disproportionate cost for groundwater cleanup is necessary for the Site. For the disproportionate

cost analysis for soil, the cost per MTCA benefit determined for soil cleanup Alternative 2 is nearly 15 times greater than the cost per MTCA benefit ratio for soil cleanup Alternative 1 and therefore is disproportionate in cost relative to the incremental benefits gained from soil cleanup Alternative 2 over Alternative 1.

Based on the MTCA evaluation process, groundwater cleanup action Alternative 2, enhanced air sparging with targeted soil vapor extraction, was selected as the preferred cleanup alternative for groundwater for the Site. The recommended cleanup alternative for groundwater consists of installation of additional air sparging wells on the Washington State Independent Auto Dealers Association and Kong Thong Thai Restaurant properties south of the intersection of 7th Street Southeast and Auburn Way South and along the southwest side of the Auburn Way South right-of-way. Air sparging and soil vapor extraction systems operated up-gradient from these proposed locations have greatly reduced COC concentrations in groundwater and the area of the groundwater plume where COCs exceed MTCA Method A cleanup levels. It is anticipated that expansion of air sparging with targeted soil vapor extraction will further reduce concentrations of COCs in areas down-gradient but beyond the area of influence of current air sparging wells.

Soil cleanup Alternative 2, institutional controls, was selected as the preferred cleanup alternative for soil for the Site based on the results of the disproportionate cost analysis. The preferred cleanup alternative for soil would require recording of an environmental covenant or covenants covering the areas of the Site where soil at depths of less than 15 feet bgs contain concentrations of COCs exceeding MTCA cleanup levels. These areas include the east and west perimeter of the 1998 excavation at the bulk fuel storage area and at the former location of heating oil UST H-1.

The FS is intended to provide sufficient information to enable Ecology and CHS to concur on the selection of a final cleanup action for the Site. Selection of a final cleanup action will be documented in a Cleanup Action Plan prepared in accordance with WAC 173-340-380.

1.0 INTRODUCTION

Farallon Consulting, L.L.C. (Farallon) has prepared this Feasibility Study (FS) on behalf of CHS Inc. (CHS) for the CHS Auburn facility at 238 8th Street Southeast in Auburn, Washington and contiguous areas where concentrations of petroleum hydrocarbons and related compounds in soil or groundwater exceed the applicable cleanup levels from releases at the CHS Auburn facility (herein referred to as the Site). The location of the Site is depicted on Figure 1. A Site Plan is provided on Figure 2. The Site name is listed on the Washington State Department of Ecology (Ecology) Confirmed and Suspected Contaminated Sites List database as "Cenex Valley Supply Coop" under Site Identification No. 2487. For the purposes of this document, CHS refers to both Cenex Supply and Marketing, Inc. (Cenex) and CHS Inc.

Cenex, a predecessor to CHS, entered into Agreed Order DE-94TC-N396 with Ecology on November 7, 1994. Agreed Order DE-94TC-N396 was subsequently terminated and replaced with Agreed Order No. 4033 entered into by CHS and Ecology with an effective date of June 12, 2007. Agreed Order No. 4033 requires that CHS conduct a remedial investigation/feasibility study (RI/FS) for the Site. The RI activities were completed in 2011 and the Remedial Investigation Report was submitted to Ecology in July 2011 (Farallon 2011b) after addressing comments (Farallon 2011a) received from Ecology (2010) on the draft Remedial Investigation Report (Farallon 2009).

1.1 PURPOSE

The cleanup action for the Site is being conducted in accordance with the Washington State Model Toxics Control Act Cleanup Regulation (MTCA) and its implementing regulations in Chapter 173-340 of the Washington Administrative Code (WAC 173-340). The purpose of the FS is to develop and evaluate cleanup action alternatives to facilitate selection of a final cleanup action at the Site in accordance with WAC 173-340-350(8). An initial screening of remediation technologies was performed consistent with the provisions of WAC 173-340-350(8)(b) to eliminate cleanup alternatives that are clearly not technically feasible; whose costs are clearly disproportionate under WAC 173-340-360(3)(e); or that will be inconsistent with the uses of the properties that comprise the Site. The FS is intended to provide sufficient information to enable Ecology and CHS to concur on the selection of a final cleanup action for the Site. Selection of a final cleanup action will be documented in a Cleanup Action Plan prepared in accordance with WAC 173-340-380.

1.2 ORGANIZATION OF THE REPORT

The FS Report is organized as follows:

- Section 2 provides a description of the Site and a summary of environmental investigations conducted at and in the vicinity of the Site.
- Section 3 presents an updated conceptual site model.
- Section 4 presents the cleanup action objectives and cleanup standards for the Site.

- Section 5 describes the screening of cleanup action alternatives for the Site.
- Section 6 presents the disproportionate cost analysis for groundwater cleanup alternatives.
- Section 7 presents the disproportionate cost analysis for soil cleanup alternatives.
- Section 8 presents the preferred cleanup alternatives for groundwater and soil and a discussion of the MTCA selection criteria process.
- Section 9 summarizes the preferred cleanup remedies for soil and groundwater.
- Section 10 lists the references cited in this document.

2.0 BACKGROUND

2.1 SITE DESCRIPTION

The Site is located in Sections 18 and 19, Township 21 North, Range 5 East of the Willamette Meridian in King County, Washington. The Site extends from the CHS Auburn facility at the southwestern corner of the intersection of 8th Street Southeast and C Street Southeast in Auburn, to approximately 100 feet northeast of Auburn Way South, a distance of approximately 400 feet north-northeast of the CHS Auburn facility (Figure 2). Based on the findings of the 2007 through April 2011 remedial investigation (RI) activities, the approximate extent of petroleum hydrocarbons in soil and groundwater at concentrations exceeding MTCA Method A cleanup levels, and potentially affected parcels are depicted on Figure 3.

The CHS Auburn facility consists of five King County tax parcels that are described as follows:

- Parcel No. 3141600670—Includes the pump islands and underground storage tanks (USTs), depicted on Figure 3 as CHS Pump Islands;
- Parcel No. 1921059074—The eastern portion of the CHS building and the parking lot south of Parcel No.3141600670, depicted on Figure 3 as CHS East Building;
- Parcel No. 1921059126—The western portion of the CHS building, depicted on Figure 3 as CHS Central Building;
- Parcel No. 3141600720—The small area to the west of the CHS building, depicted on Figure 3 as CHS West Building; and
- Parcel No. 3141600800—The current truck parking area north of 8th Street Southeast, depicted on Figure 3 as CHS Across Street.

Contamination of soil or groundwater at levels exceeding MTCA Method A cleanup levels has not been documented on the parcels that comprise the western and central portions of the building on the CHS Auburn facility (Figure 3).

Other parcels located within the Site, as defined by the delineated extent of groundwater or soil with concentrations of total petroleum hydrocarbons (TPH) as diesel-range organics (DRO) and/or as gasoline-range organics (GRO), and/or benzene, toluene, ethylbenzene, and xylenes (BTEX) exceeding MTCA Method A cleanup levels since August 2007, include portions of the following:

- Kong Thong Thai Restaurant (Thai Restaurant)—Parcel No. 3141600810 (referred to in previous investigations as the former Tortilla Grande property), depicted on Figure 3 as Thai Restaurant;
- Washington State Independent Auto Dealers Association (WSIADA)—Parcel No. 0835000035, depicted on Figure 3 as WSIADA;
- McDonalds Restaurant—Parcel No. 1821059197 (once part of the former Hillman property), depicted on Figure 3 as McDonalds;

- Anytime Fitness—Parcel No. 1821059324 (referred to in previous investigations as Schuck's Firehouse Square or the Hillman property), depicted on Figure 3 as Firehouse Square West; and
- Firehouse Square Strip Mall—Parcel No. 1821059166 (referred to in previous investigations as the Hillman property), depicted on Figure 3as Firehouse Square East.

The Site is paved, with the exception of the area northeast of the Firehouse Square strip mall building adjacent to D Street Southeast, the planters on the Firehouse Square and McDonalds Restaurant properties, a strip between the parking lot and the sidewalk at the Thai Restaurant property, a landscaped median strip on Auburn Way South, and planters along C Street Southeast east of the CHS Auburn facility (Figure 2).

2.2 ENVIRONMENTAL INVESTIGATION SUMMARY

Environmental investigations were conducted at and in the vicinity of the Site following the 1987 discovery of petroleum hydrocarbon impacts to soil and groundwater on the former City of Auburn fire station property northeast of Auburn Way South, across from the CHS Auburn facility. The fire station property was subsequently sold by the City of Auburn and developed into the Firehouse Square, Former Schuck's Auto Supply, and McDonald's restaurant properties (Figure 2). Remedial activities have been ongoing since 1994, with one groundwater remediation system, designated as the Central System, currently active at the Site. The constituents of concern (COCs) identified for the Site are DRO, GRO, TPH as oil-range organics (ORO), and BTEX.

A substantial amount of environmental data have been collected at the Site since remedial activities commenced in 1994, including over 18 years of groundwater monitoring data. Groundwater remediation activities also have been ongoing for over 18 years. Therefore, the focus of the RI was to assess current conditions pertaining to soil and groundwater quality to support the development of an FS with a goal of selecting a final remedy that can be implemented in a reasonable time frame that is compliant with MTCA. The RI has been completed, and the remaining data gaps that had been identified for the Site have been addressed.

Interim cleanup actions conducted at the Site to date include:

- Installation and operation of an air sparging (AS) and soil vapor extraction (SVE) system to treat soil and groundwater at the perimeter of the CHS Auburn facility in 1994 (Perimeter System) (Figure 2);
- Groundwater and light nonaqueous-phase liquid (LNAPL) extraction, with initial off-Site disposal and subsequent on-Site treatment and re-infiltration of groundwater from 1994 to 1996;
- Installation and operation of an AS/SVE system to treat soil and groundwater in the down-gradient portion of the Site in 1995 (Down-Gradient System) (Figure 2);
- Installation and operation of an AS/SVE system to treat soil and groundwater in the central portion of the Site in 1996 (Central System) (Figure 2);

- Closure of 14 USTs and 12 aboveground storage tanks (ASTs) on the CHS Auburn facility in 1997 and 1998; and
- Excavation of over 8,100 tons of petroleum-contaminated soil from the bulk fuel storage area at the CHS Auburn facility and disposal off the Site in 1998.

The SVE component of the Central and Perimeter Systems was shut down with Ecology approval in late 1999 due to the low concentrations of petroleum hydrocarbon vapors present. The AS component of the Central System continues to operate in the central area of the Site. The AS component of the Perimeter System was shut down during dissolved-oxygen enhancement testing from 2009 through 2011 so that sparge air flow could be maximized in the down-gradient area of the adjacent Central System where residual concentrations of COCs in groundwater are now located. The Perimeter and Central Systems are piped to a common air compressor system. The SVE component of the Down-Gradient System was shut down in the late 1990s, and the AS component was turned off in 2007. The Down-Gradient System was decommissioned in July 2010 in conjunction with City of Auburn street improvements to D Street Southeast, south of State Route 18.

The likely primary source of petroleum hydrocarbon impacts to groundwater was removed to the extent practicable with the excavation of soil from the former bulk fuel storage area of the CHS facility in 1998. Site-wide soil sampling conducted in 2007 and 2008 confirmed that nearly all remaining soil with COC concentrations exceeding applicable MTCA cleanup levels is located at depths of greater than 16 feet below ground surface (bgs) within the petroleum hydrocarbon smear zone that has developed near the water table. COCs were detected at concentrations exceeding applicable MTCA cleanup levels in soil samples collected at depths of less than 15 feet bgs from isolated areas on the CHS facility property in 1998. However, the analytical results for groundwater samples collected from monitoring wells immediately down-gradient of these areas have not exceeded MTCA cleanup levels for at least the previous 4 to 5 years of monitoring, indicating that residual concentrations of COCs in soil are not migrating to groundwater. A summary of analytical results for TPH constituents and BTEX in groundwater is provided in Table 1.

As a result of the interim actions taken to date, the dissolved-phase plumes of COCs in groundwater are greatly diminished from their historical extent in the mid-1990s. Similarly, remaining concentrations of COCs in groundwater are substantially lower than a decade ago and are within an order of magnitude of conservative MTCA Method A cleanup levels. Concentrations of GRO and benzene from the March 1995 and October 2011 monitoring events are provided on Figures 4 and 5, respectively, and concentrations of DRO from the March 1997 and October 2011 monitoring events are provided on Figure 6. LNAPL is no longer present on groundwater at the Site. The DRO, GRO, and benzene plumes in groundwater are commingled and generally located immediately the northeast and southwest of Auburn Way South, with the majority of the area of groundwater containing COCs at concentrations exceeding applicable cleanup levels likely lying beneath this major thoroughfare.

Both geochemical data collected for a monitored natural attenuation assessment and empirical data collected at the Site suggest that COC degradation in groundwater is occurring as a result of

natural attenuation processes in the plume area where anaerobic conditions are prevalent. Dissolved-oxygen enhancement testing beginning in 2006 showed that dissolved oxygen introduced in AS wells immediately up-gradient of the current COC plumes in groundwater is generally consumed as a result of biological or chemical processes related to the contaminant mass in the smear zone within a short distance down-gradient of the AS wells.

3.0 CONCEPTUAL SITE MODEL

This section presents the conceptual site model, including a discussion of the COCs and affected media, confirmed and suspected sources of COCs, known or potential routes of migration, and known or suspected human or ecological receptors. The conceptual site model has been refined from an earlier version presented in the RI Report (Farallon 2011b) based on data gathered subsequent to preparation of the RI Report.

3.1 CONSTITUENTS OF CONCERN AND AFFECTED MEDIA

The COCs at the Site are DRO, ORO, GRO, and BTEX constituents. The affected media at the Site are soil and groundwater. The DRO, GRO, and BTEX in groundwater are in the dissolved phase. DRO, GRO, and benzene are the only COCs that have been detected in groundwater at concentrations exceeding MTCA Method A cleanup levels in the previous several years of monitoring. COCs were not detected in soil gas at concentrations exceeding MTCA Method B cleanup levels for shallow soil gas samples during sub-slab soil gas sampling at the WSIADA building at 707 Auburn Way South in April 2012 (Farallon 2012). The concentrations of toluene and m,p-xylene, the only constituents detected in the sub-slab soil gas sample, were two to three orders of magnitudes below the MTCA Method B cleanup levels for shallow soil gas samples. Therefore, soil gas is not a medium of concern for the Site.

Analytes that are required for testing at petroleum release sites, as defined in Table 830-1 of WAC 173-340-900, have been previously analyzed for in various media at the Site and were not detected at concentrations above applicable MTCA cleanup levels. These analytes include lead, polycyclic aromatic hydrocarbons, 1,2-dibromoethane, 1,2-dichloroethane, methyl tertiary-butyl ether, halogenated volatile organic compounds, and polychlorinated biphenyls.

3.1.1 Soil

The RI results indicate that soil with concentrations of COCs exceeding MTCA Method A cleanup levels is generally limited to depths of approximately 25 to 30 feet bgs within the smear zone that formed within the range of seasonal groundwater elevation fluctuations at the Site (Farallon 2011b). Soil samples collected during the RI that contained DRO, GRO, or benzene at concentrations exceeding MTCA Method A cleanup levels were from borings installed on the CHS Auburn facility, in C Street Southeast along the eastern perimeter of the CHS Auburn facility, on the Thai Restaurant property, and along the right-of-way southwest and northeast of Auburn Way South (Figure 7). The depths where COCs were detected in soil at concentrations above MTCA Method A cleanup levels is normally below the water table within the smear zone at depths greater than 15 feet bgs, with the exception of an area on the CHS Auburn facility near the limits of the 1998 excavation at the former bulk fuel storage area, and an isolated area near former heating oil UST H-1 (Figure 8). It was not feasible to remove additional petroleum-contaminated soil at the bulk fuel storage area during the 1998 excavation without additional engineering controls due to the depth of the excavation at greater than 25 feet bgs, the non-cohesive nature of the soil, and the proximity of residual contamination to C Street Southeast, utilities, and the CHS offices and retail store structure. Further, soil samples collected in 2007

indicated that residual petroleum hydrocarbon concentrations near the former bulk fuel facility had diminished since 1998 (Figures 7 and 8).

3.1.2 Groundwater

Groundwater monitoring results for the sampling events conducted from 2007 through April 2012 indicate that groundwater containing concentrations of COCs exceeding MTCA Method A cleanup levels is present at the Thai Restaurant and WSIADA properties to the north; at several properties northeast of Auburn Way South, including the McDonalds restaurant, former Schuck's Auto Supply (now Anytime Fitness), and Firehouse Square mall properties; and likely beneath Auburn Way South. Because DRO analyses for groundwater have been conducted at the Site using the sulfuric acid/silica gel cleanup step since 2008, these data have been used for evaluation of groundwater cleanup alternatives for the Site in the Feasibility Study. A summary of groundwater analytical results for TPH and BTEX constituents is provided in Table 1. The areas of the Site where DRO, GRO, and benzene have been detected in groundwater at concentrations above MTCA Method A cleanup levels have been reduced by more than 90 percent of their historical maximum areal extents in the mid-1990s, and have remained similar in size for at least several years (Figures 4 through 6). The area of dissolved-phase COCs in groundwater at concentrations above MTCA Method A cleanup levels is several hundred feet down-gradient of the likely historical source at the former bulk fuel storage area on the CHS Auburn facility.

3.1.3 LNAPL

The last measurable thickness of LNAPL at the Site was recorded in October 1996 at 0.04 feet in monitoring well CMW-10. Although sheens have since been reported in water purged from monitoring well CMW-10, a measurable accumulation of LNAPL on groundwater at the Site has not been observed for over 16 years. The thickest accumulations of LNAPL at the Site were measured in 1994, at approximately 1 to 1.5 feet thick in monitoring wells CMW-2 and CMW-10 and recovery well CRW-1 on the current Thai Restaurant property, and at monitoring well HMW-11 on the McDonalds Restaurant property. Thinner accumulations of LNAPL were measured in 1994 in monitoring wells CMW-1 and HMW-13, which are or were located on or immediately adjacent to the CHS Auburn facility. LNAPL recovery and groundwater extraction activities had effectively removed LNAPL from the water table at these wells by mid-1996.

Forensic laboratory analyses of LNAPL samples conducted in 1994 indicated that the LNAPL was a mixture of gasoline and diesel, but predominantly gasoline. Interpretation of the analytical results at that time suggested that either multiple sources existed or that multiple releases had occurred.

A total of 1,754 gallons of LNAPL reportedly was recovered from the recovery well CRW-1 groundwater extraction system. Although Farallon did not find documentation of LNAPL volumes recovered from other wells during review of available Site documents, the total volume of LNAPL recovered from other wells likely is insignificant compared to that recovered from recovery well CRW-1 due to the passive recovery methods used at the other wells.

3.2 CONFIRMED AND SUSPECTED SOURCES

No single primary source for the release of petroleum hydrocarbon constituents to soil and groundwater has been identified for the Site. Two potential sources were described by Summit Envirosolutions, Inc. (Summit) (1995). In January 1984, before CHS acquired the CHS Auburn facility, a diesel spill occurred resulting from a tank overfill. The location of the tank was not identified in the documents reviewed by Farallon for the RI. Although the spill reportedly was cleaned up, the extent and subsurface impacts of the spill are unknown. On May 25, 1994, a leak from a below-grade pipe was discovered when fuel was observed leaking from a crack in the concrete pad between the ASTs and the overhead fueling rack. CHS personnel reported that when the pipe was exposed, it appeared to have a "pinhole-sized leak." After the pipe was replaced, approximately 45 cubic yards of soil reportedly was removed from the affected area by CHS personnel. Based on visual observations and the soil type (permeable sand and gravel), the depth of petroleum hydrocarbon impacts in soil appeared to exceed the depth of the excavation (Summit 1995).

Based on the observation of near-surface contamination during excavation of the bulk fuel storage area in 1998, leaks from underground piping, USTs, the oil-water separator, and possibly ASTs in this area may have been the primary sources of petroleum hydrocarbon contamination to soil and/or groundwater at the Site. A dry well found within the containment in the bulk fuel storage area during closure activities in 1998 also may have acted as a conduit for surface releases to impact subsurface soil and groundwater. Significant impacts to soil were observed in the bulk fuel storage area at depths extending to the water table. However, with the exception of the piping leak at the fueling rack, Farallon did not locate any references to or mention of direct observation of leaking ASTs or piping in the Site documents reviewed for the RI.

The excavation of over 8,000 tons of petroleum-contaminated soil from the former AST area in 1998 was effective in mitigating the primary source(s) of contamination affecting groundwater at the CHS Auburn facility. The current extent of the petroleum hydrocarbon-contaminated groundwater at the Site appears to be associated with residual concentrations of TPH and BTEX constituents that exist in smear zone soil found at depths that correspond to the range of historical groundwater elevation fluctuations. The petroleum hydrocarbon smear zone appears to be approximately 5 to 10 feet in thickness. No significant concentrations of TPH or BTEX constituents were found in vadose zone soil during the Site-wide RI or Supplemental RI sampling activities conducted in 2007 and 2008. The field screening and analytical evidence of petroleum hydrocarbon impacts to soil observed in the 2007 and 2008 investigations were from soil samples collected below 15 feet bgs and appear to be related to the petroleum hydrocarbon smear zone that has developed within the range of groundwater elevation fluctuations at the Site.

With the exception of a single exceedance for DRO and ORO from monitoring well HMW-13, groundwater samples collected from monitoring wells installed on and cross-gradient of the CHS Auburn facility during the RI and Supplemental RI did not exceed MTCA Method A groundwater cleanup levels for GRO, DRO, ORO, or BTEX constituents. The recent and historical soil and groundwater data suggest that the residual source of petroleum hydrocarbon leaching to groundwater is soil in the smear zone in the areas down-gradient of the CHS Auburn

facility on the northern and northeastern periphery of the Thai Restaurant property and the adjacent WSIADA property to the north, likely extending beneath Auburn Way South to the area of monitoring well CMW-12.

3.3 KNOWN OR POTENTIAL ROUTES OF MIGRATION

The known or potential routes for contaminant migration at the Site include leaching from smear zone soil to groundwater, and lateral and vertical transport in groundwater. Soil above 15 feet bgs does not appear to be contributing petroleum hydrocarbon constituents via leaching to groundwater.

3.4 KNOWN OR SUSPECTED HUMAN OR ECOLOGICAL RECEPTORS

Shallow groundwater is not used as a drinking water resource and does not discharge to surface water in the vicinity of the Site. The current area of soil containing concentrations of COCs exceeding MTCA Method A cleanup levels is in the smear zone at depths typically greater than 20 feet bgs. As a result, exposure from direct contact with impacted soil is unlikely. Some petroleum hydrocarbon impacts to soil at depths above the smear zone may still exist around the perimeter of the October 1998 excavation at the bulk fuel loading and storage area, where logistical constraints and safety concerns regarding the presence of the retail store structure on the CHS Auburn facility and the adjacent road limited the extent of contaminated soil removal. These limitations still exist, as the road, C Street Southeast, and the CHS building are still present. A single soil sample collected from a depth of less than 15 feet bgs during the closure of former heating oil UST H-1 on the CHS Auburn facility property in 1998 exceeded the MTCA Method A cleanup level for DRO. Workers excavating soil near the limits of the 1998 excavation or heating oil UST H-1 could be exposed to COCs in soil. However, the current concentrations of COCs in soil above 15 feet bgs in these two areas is not known since the soil samples that exceeded MTCA Method A cleanup levels were collected in 1998. Potential exposure to ecological receptors likely is minimal due to the depth to impacts and the fact that the majority of the Site is paved.

4.0 CLEANUP ACTION OBJECTIVES AND CLEANUP STANDARDS

The following sections present the cleanup action objectives and cleanup standards for the cleanup action at the Site.

4.1 CLEANUP ACTION OBJECTIVES

Cleanup action objectives address the primary goals that a remedial action should achieve in order to be retained for further evaluation for the FS. The cleanup action objective for the Site is to remediate contaminated soil and groundwater that poses a potential threat to human health and environment, in a timely and cost-effective manner. The Site-specific goals for remediation of contaminated soil and groundwater include:

- Reduce concentrations of COCs in groundwater to below MTCA Method A cleanup levels for groundwater to the extent practicable at the established point of compliance for groundwater within a reasonable restoration time frame.
- Mitigate the potential for direct contact exposure to COCs in soil present at depths of less than 15 feet bgs.

4.2 CLEANUP STANDARDS

Cleanup standards consist of the cleanup levels, points of compliance, and other regulatory requirements that apply to a site. The cleanup standards for the Site are presented below.

4.2.1 Cleanup Levels

A cleanup level is defined by MTCA as the "concentration of a hazardous substance in soil, water, air, or sediment that is determined to be protective of human health and the environment under specified exposure conditions." MTCA provides three methods for establishing cleanup levels. Under MTCA Method A, cleanup levels are set at concentrations that are at least as stringent as those specified in Tables 720-1, 740-1, and 745-1 of WAC 173-340-900 and in applicable state and federal laws. MTCA Method A is applicable to sites that may involve a relatively routine cleanup action or few hazardous substances. MTCA Method B provides for determination of cleanup levels for all media and sites as standard and modified site-specific cleanup levels. MTCA Method C applies to sites where compliance with MTCA Method A or B cleanup levels may be technically impractical or may cause greater environmental harm. Under MTCA Methods B and C, cleanup levels are established with consideration of applicable local, state, and federal laws, and with the risk equations and other requirements specified in WAC 173-340-720 through 173-340-760.

MTCA Method A cleanup levels for unrestricted land uses are appropriate for the Site since there are few hazardous substances at the Site, and the cleanup action is considered to be relatively routine in nature.

The MTCA Method A cleanup levels for COCs in soil are:

- GRO—30 milligrams per kilogram (mg/kg);
- DRO—2,000 mg/kg;
- ORO—2,000 mg/kg;
- Benzene—0.03 mg/kg;
- Toluene—7 mg/kg;
- Ethylbenzene—6 mg/kg; and
- Xylenes—9 mg/kg.

Although the MTCA Method A cleanup level for ORO for soil is provided above for reference, ORO has not been detected in any soil samples collected at the Site at concentrations exceeding this cleanup level. ORO has occasionally been detected in groundwater samples, typically associated with higher concentrations of DRO.

The MTCA Method A cleanup levels for COCs in groundwater are:

- GRO—800 micrograms per liter (µg/l);
- DRO—500 µg/l;
- ORO—500 µg/l;
- Benzene—5 µg/l;
- Toluene—1,000 µg/l;
- Ethylbenzene—700 µg/l; and
- Xylenes—1,000 µg/l.

4.2.2 Points of Compliance

Point of compliance, as defined in WAC 173-340-200, means the point or points where cleanup levels established in accordance with WAC 173-340-720 through 173-340-760 shall be attained. Points of compliance have been established for soil at the Site for the following pathways:

- Human exposure via direct contact with soil; and
- Protection of groundwater.

For protection of direct human contact with soil, the point of compliance will be soil throughout the Site from the ground surface to 15 feet bgs. This represents a reasonable estimate of the depth of soil that could be excavated and distributed at the soil surface as a result of Site development activities in accordance with WAC 173-340-740(6)(d). For protection of groundwater, the point of compliance for soil will be soil throughout the Site from the surface to the depth of the water table.

For groundwater, the point of compliance will be established throughout the Site from the uppermost level of the saturated zone extending vertically to the lowest depth that could potentially be affected by the Site.

4.2.3 Applicable or Relevant and Appropriate Requirements

Legally applicable requirements, defined in WAC 173-340-710(3) "include those cleanup standards, standards of control, and other environmental protection requirements, criteria, or limitations adopted under state or federal law that specifically address a hazardous substance, cleanup action, location or other circumstances at the site." Relevant and appropriate requirements, as defined in WAC 173-340-710(4) "include those cleanup standards, standards of control, and other environmental requirements, criteria, or limitations established under state or federal law that, while not legally applicable to the hazardous substance, cleanup action, location, or other circumstance at a site, address problems or situations sufficiently similar to those encountered at the site that their use is well suited to the particular site." The legally applicable or relevant and appropriate requirements for the cleanup action at the Site are provided in Table 2.

5.0 CLEANUP ACTION ALTERNATIVE SCREENING

The following sections present a discussion of the screening of feasible cleanup action alternatives for groundwater and soil at the Site. Groundwater and soil cleanup action alternatives are discussed separately. The evaluation of groundwater cleanup action alternatives is presented first because the cleanup of groundwater is a higher priority for the Site due to impacts off the CHS Auburn facility property, and because soil impacts above 15 feet bgs are very limited in areal extent.

5.1 EVALUATION OF FEASIBLE CLEANUP TECHNOLOGIES

As part of the FS, Farallon evaluated cleanup action alternatives for the Site with respect to the cleanup requirements set forth in MTCA. The FS considered the requirements under WAC 173-340-350, Site-specific conditions, and the criteria defined in WAC 173-340-360 for the screening of potentially feasible cleanup action alternatives for the Site. A cleanup action alternative must satisfy all of the following threshold criteria, as specified in WAC 173-340-360(2):

- Protect human health and the environment;
- Comply with cleanup standards;
- Comply with applicable state and federal laws; and
- Provide for compliance monitoring.

These criteria represent the minimum standards for an acceptable cleanup action. In addition to meeting the threshold criteria, cleanup actions under MTCA must also:

- Use permanent solutions to the maximum extent practicable;
- Provide for a reasonable restoration time frame, and
- Consider public concerns on the cleanup action.

A preliminary analysis of potential cleanup action alternatives was conducted to focus the FS on those technologies best suited to meet the cleanup objectives with consideration of Site-specific conditions identified in the conceptual site model.

The key Site-specific conditions that were considered during the initial screening of potential feasible cleanup action alternatives included:

- The presence of a relatively thin and widespread petroleum hydrocarbon smear zone at or below the water table at depths of approximately 25 to 30 feet bgs;
- The presence of both volatile COCs such as GRO and benzene in groundwater and less volatile, more recalcitrant DRO;
- The presence of COCs in soil within the smear zone at concentrations above MTCA Method A cleanup levels;

- The absence of soil contamination at concentrations exceeding MTCA Method A cleanup levels above the smear zone (i.e., less than 15 feet bgs) in areas located beyond the CHS Auburn facility property;
- The presence of cobbles and gravels in alluvial soil at the Site that limits the types of drilling methods that could be used for installation of remediation wells or injection points;
- High groundwater velocity estimated at approximately 4 feet per day;
- Relatively large seasonal fluctuation of groundwater elevations (8 feet).
- Relatively low contaminant concentrations in groundwater;
- Strongly anaerobic groundwater conditions within the plume boundaries;
- The absence of LNAPL;
- Access limitations due to the location of Auburn Way South in the middle of the groundwater plume and the presence of numerous subsurface utilities within the right-of-way; and
- The presence of operating commercial businesses on the Site necessitating selection of cleanup action alternatives that will result in minimal interference with business operations while accomplishing the cleanup.

A number of remediation technologies for cleanup of groundwater were eliminated from further consideration in the FS during the initial screening process that was conducted in accordance with WAC 173-340-350(8)(b). These technologies included, but were not limited to, phytoremediation and thermal resistive heating. A "no action" alternative did not meet the cleanup action objectives, the protectiveness criteria, and/or permanence minimum requirements. Therefore, the "no action" alternative was not further evaluated.

Pump and treat technologies for groundwater also were eliminated from further consideration due to the long restoration time frames associated with the methods. Although pump and treat methods would reduce the mass of dissolved contaminants in groundwater, the technology would not reduce residual concentrations of COCs in the smear zone soil that is acting as the primary source of contamination via dissolution to groundwater at the Site. Further, pumping and treating of groundwater was conducted at the Site in 1994 through 1996, at which time it was discontinued due to more-effective removal of contaminants in groundwater using other techniques such as AS and SVE.

Enhanced bioaugmentation by low-flow AS was not considered as a stand-alone alternative for cleanup of groundwater based on review of current and past AS system operations and dissolved-oxygen enhancement testing results. Biological and chemical processes related to the petroleum hydrocarbon mass in the smear zone appear to consume dissolved oxygen rapidly near the injection locations, which limits the effective radius of influence of the individual sparge points. Therefore, under present conditions, low-airflow AS operations would require more AS wells than standard AS methods, and higher operation and maintenance costs to achieve similar

objectives. However, enhanced bioaugmentation will be evaluated as a polishing step following more-aggressive remedial methods such as standard AS operations once COC concentrations have been reduced in groundwater and smear zone soil as discussed in more detail in Section 8.1.1 under the description of the preferred cleanup alternative for groundwater selected for the Site.

Excavation of smear zone soil also was eliminated as a viable cleanup action alternative for protection of groundwater. The smear zone is laterally extensive, extending beneath multiple properties, structures, and roadways. The smear zone at the Site typically is below the water table, with the exception of periods of extremely low groundwater levels. Further, the depth of the smear zone, at approximately 25 to 30 feet bgs, is below the point of compliance for soil for direct contact.

SVE was eliminated as a viable cleanup action alternative for vadose zone soil because it is not an effective cleanup technology for DRO. The highest concentrations of petroleum hydrocarbon constituents in soil samples collected on the perimeter of the 1998 excavation were DRO, and residual contamination at the former heating oil tank on the CHS Auburn facility also was DRO. SVE was used at the Site until 1999, when the SVE component of the Central and Perimeter Systems was shut down with Ecology approval due to the low concentrations of petroleum hydrocarbon vapors present. However, SVE is retained for evaluation as a component of an AS cleanup action alternative for groundwater to control vapor migration.

Excavation with on-Site treatment of vadose zone soil was not considered a viable cleanup action alternative for soil due to space restrictions to create treatment cells at the CHS Auburn facility.

5.2 GROUNDWATER CLEANUP ACTION ALTERNATIVES

Based on the Site-specific conditions described above as derived from the RI for the Site, the results of completed and ongoing interim cleanup actions, and previous pilot testing, three cleanup action alternatives for groundwater were retained for further consideration in the FS. These cleanup action alternatives are:

- Alternative 1—Monitored Natural Attenuation;
- Alternative 2—Enhanced Air Sparging with Targeted Soil Vapor Extraction; and
- Alternative 3—In-Situ Chemical Oxidation and Enhanced Bioremediation.

Each of the cleanup action alternatives for groundwater retained for evaluation for the Site satisfies the threshold and other minimum requirements for cleanup actions as specified in WAC 173-340-360(2). The cleanup action alternatives for groundwater retained for evaluation are discussed below.

5.2.1 Groundwater Cleanup Alternative 1—Monitored Natural Attenuation

Groundwater cleanup Alternative 1 consists of monitored natural attenuation of contaminants in smear zone soil and groundwater. For this alternative, operation of the existing AS/SVE systems

at the Site would be terminated to allow for interpretation of the data independent of the influence of the systems.

5.2.2 Groundwater Cleanup Alternative 2—Enhanced Air Sparging with Targeted Soil Vapor Extraction

Groundwater cleanup Alternative 2 consists of installation of additional AS wells on the WSIADA and Thai Restaurant properties south of the intersection of 7th Street Southeast and Auburn Way South, and along the southwest side of the Auburn Way South right-of-way. The AS wells would be spaced closer than the existing AS wells in the area to ensure overlapping areas of influence. A line of several AS wells along Auburn Way South would be installed using angle drilling methods, as feasible, so that the well screens will be located beneath the roadway to facilitate remediation of groundwater and smear zone soil in the down-gradient direction of groundwater flow. Several SVE wells would be installed on the WSIADA property to collect volatile contaminant vapors and mitigate additional risk for vapor intrusion into the WSIADA building as a result of the AS activities.

5.2.3 Groundwater Cleanup Alternative 3—In-Situ Chemical Oxidation and Enhanced Bioremediation

Groundwater cleanup Alternative 3 consists of in-situ chemical injection of oxidizing compounds to promote the breakdown of contaminants in smear zone soil and groundwater, followed by injection of oxygen-releasing compounds designed to accelerate natural attenuation of petroleum hydrocarbon constituents by promoting biodegradation by naturally occurring microorganisms. This alternative likely would require installation of semi-permanent reusable injection points because the gravelly soil would preclude use of direct-push drilling methods, which typically are used for in-situ chemical injection applications. Selection of the chemical reagents for the injection would be accomplished following review of bench-testing using Site groundwater.

5.2.4 Other Groundwater Cleanup Activities

This section presents an overview of the other activities that will need to be conducted during the cleanup action that are common to each of the cleanup alternatives.

5.2.4.1 Groundwater Monitoring and Reporting

Groundwater performance and confirmation monitoring and reporting will be required to evaluate the effectiveness of each of the cleanup alternatives evaluated.

5.2.4.2 Decommissioning of Non-Essential AS/SVE and Monitoring Wells

Decommissioning of non-essential AS/SVE and monitoring wells would be conducted as part of each of the cleanup alternatives considered. A list of non-essential AS/SVE and monitoring wells for decommissioning will be developed along with the cleanup action monitoring requirements through discussion with Ecology following final selection of cleanup alternatives.

5.3 SOIL CLEANUP ACTION ALTERNATIVES

The key considerations for selecting soil cleanup action alternatives for further evaluation for the FS regard the location of contaminated near surface soil and groundwater quality in and down-gradient of these areas. The only areas of the Site where soil at depths of less than 15 feet bgs has been documented to contain concentrations of COCs exceeding MTCA Method A cleanup levels for unrestricted land use are on the east and west sides of the 1998 excavation at the former bulk fuel storage area, and an isolated area near former heating oil UST H-1, both of which are on the CHS Auburn facility property (Figure 8). It has not been determined whether the area on the east side of the 1998 excavation where COC concentrations exceed MTCA Method A cleanup levels extends to the C Street Southeast right-of-way which includes the sidewalk adjacent to the former bulk fuel storage area. Groundwater analytical results for samples collected from monitoring wells located down-gradient of these areas have demonstrated that the residual concentrations of COCs in shallow soil are protective of the migration to groundwater exposure pathway. Therefore, the primary risk that the COCs in soil above 15 feet bgs pose are for the direct contact human health exposure pathway. Based on these considerations and the type of residual contamination, which is primarily weathered DRO with lesser concentrations of GRO, two cleanup action alternatives for soil were retained for further consideration further in the FS. These soil cleanup action alternatives are:

- Alternative 1—Institutional Controls; and
- Alternative 2—Excavation and Off-Site Disposal of Soil.

Each of the cleanup alternatives for soil retained for evaluation for the Site satisfies the threshold and other minimum requirements for cleanup actions, as specified in WAC 173-340-360(2). The cleanup alternatives for soil retained for evaluation are discussed below.

5.3.1 Soil Cleanup Alternative 1—Institutional Controls

Soil cleanup Alternative 1 would require the recording of an environmental covenant on the property deed for those areas of the Site where soil at depths of less than 15 feet bgs contain concentrations of COCs exceeding applicable MTCA cleanup levels. These areas include the east and west perimeter of the 1998 excavation at the bulk fuel storage area, and the former location of heating oil Tank H-1, which was removed from the CHS Auburn facility property in 1998 (Figure 8). The environmental covenant likely would require notification of Ecology if soil was disturbed in these areas, and perhaps maintenance of existing asphalt and concrete surfaces.

WAC 173-340-360(2)(e)(iii) notes that "cleanup actions shall not rely primarily on institutional controls and monitoring where it is technically possible to implement a more permanent cleanup action for all or a portion of the site." Because the cleanup action includes remedial measures for both soil and groundwater, the overall cleanup action does not rely primarily on institutional controls, Further, the soil cleanup action has already included excavation of more than 8,100 tons of petroleum-contaminated soil from the bulk fuel storage area in 1998 and the residual soil contamination that exists at the Site is relatively minor in volume and technically difficult to access. The institutional controls alternative for soil is not a stand-alone alternative but a follow

up measure to support the integrity of benefits resulting from the previously conducted cleanup action for soil and will be undertaken in addition to the active groundwater cleanup activities.

5.3.2 Soil Cleanup Alternative 2—Excavation and Off-Site Disposal

Soil cleanup Alterative 2 would involve excavation of soil from those areas of the Site where soil at depths of less than 15 feet bgs contain concentrations of COCs exceeding MTCA Method A cleanup levels. These areas include the east and west perimeter of the 1998 excavation at the bulk fuel storage area, and the location of former heating oil Tank H-1. The excavation areas adjacent to C Street Southeast and the CHS Auburn convenience store on the east and west perimeter of the 1998 excavation at the bulk fuel storage area would require shoring due to the proximity to the C Street Southeast roadway, buried utilities, and the CHS store structure. An investigation likely would need to be conducted prior to developing the engineering design for the excavation to fully delineate the extent of soil contamination at depths of less than 15 feet bgs relative to buried utilities, the roadway, and the CHS Auburn store structure.

6.0 DISPROPORTIONATE COST ANALYSIS FOR GROUNDWATER CLEANUP ACTION ALTERNATIVES

To determine whether the cleanup action alternatives for groundwater provide permanent solutions to the maximum extent practicable, a disproportionate cost analysis was performed in accordance with WAC 173-340-360(3)(e). The following sections present the disproportionate cost analysis criteria, a comparison of the cleanup action alternatives retained for groundwater, and the disproportionate cost analysis results. The disproportionate cost analysis was used to determine whether the incremental costs of one alternative over a lower-cost alternative exceed the incremental degree of benefits achieved by the alternative over that of the lower-cost alternative.

6.1 EVALUATION CRITERIA

The evaluation criteria used to qualitatively evaluate and compare applicable cleanup action alternatives for disproportionate cost analysis are defined in WAC 173-340-360(3)(f) and include the following:

- Protectiveness: The overall protectiveness of human health and the environment, including: 1) the degree to which existing risks are reduced; 2) the time required to reduce risk at the Site and attain cleanup standards; 3) on-Site risks resulting from implementing the alternative; and 4) improvement of overall environmental quality.
- Permanence: The degree to which the alternative permanently reduces the toxicity, mobility, or volume of hazardous substances, including: 1) the adequacy of the alternative in destroying the hazardous substances; 2) the reduction or elimination of hazardous substance releases and sources of releases; 3) the degree of irreversibility of the waste treatment process; and 4) the characteristics and quantity of treatment residuals generated.
- Cost: The cost to implement the alternative, including the cost of construction, the net present value of any long-term costs, and Ecology oversight costs recoverable under MTCA. Long-term costs include operation and maintenance costs, monitoring costs, and reporting costs.
- Long-term effectiveness: The degree of certainty that the alternative will be successful, the reliability of the alternative during the period of time that hazardous substances are expected to remain on Site at concentrations exceeding cleanup levels, and the magnitude of residual risk with the alternative in place.
- Management of short-term risks: The risk to human health and the environment associated with the alternative during construction and implementation, and the effectiveness of the measures that will be taken to manage such risks. This criterion includes risks to workers implementing the cleanup alternative.
- Technical and administrative implementability: The ability of the alternative to be implemented, including consideration of whether the alternative is technically feasible,

administrative and regulatory requirements, permitting, scheduling, size, complexity, monitoring requirements, access for construction operations and monitoring, and integration with existing operations at the Site.

- Consideration of public concerns: Whether the community has concerns regarding the alternative, and if so, the extent to which the alternative addresses those concerns.

To perform the quantitative disproportionate cost analysis, Farallon assigned a value to each of these criteria for each alternative on a scale of 1 to 10, where 10 meets the criteria and 1 does not. A weighting factor was then assigned to each evaluation criterion based on the relative importance to meeting the threshold requirements. The protectiveness criterion received the highest weighting factor, followed by permanence and effectiveness over the long term, with the remaining criteria receiving the lowest weighting factors. Table 3 presents the values of the MTCA evaluation criteria, the weighting factors, and the calculated cumulative benefit ranking for each groundwater cleanup action alternative. A summary of estimated costs for each groundwater cleanup alternative is presented in Table 4.

Figure 9 presents a graphic representation of the overall benefit ranking and estimated cost for each groundwater cleanup action alternative, along with the relative cost per environmental benefit for each alternative derived following the method described in Section 6.3, Disproportionate Cost Analysis Results for Groundwater Cleanup Alternatives. A discussion of each of the evaluation criteria for the disproportionate cost analyses for the groundwater cleanup action alternatives follows.

6.2 COMPARISON OF GROUNDWATER CLEANUP ACTION ALTERNATIVES

The following sections present the comparison of retained groundwater cleanup alternatives to the disproportionate cost analysis criteria.

6.2.1 Protectiveness

The evaluation of overall protectiveness under WAC 173-340-360(3)(f)(i) includes several criteria defined in Section 6.1, Evaluation Criteria, including risk reduction and timing, cleanup implementation risks, and improvement in overall environmental quality, each of which are evaluated also as part of other criteria below. Groundwater cleanup Alternatives 2 and 3 have a similar degree of reduction in risk, and both assume a 2- to 5-year restoration time frame for cleanup of groundwater at the Site. The anticipated restoration time frame for Alternative 1 is much longer, likely greater than 20 years, due to the low biodegradation rates associated with an anaerobic subsurface environment as has been documented for the Site. Groundwater cleanup Alternatives 2 and 3 have higher short-term risks associated with implementation of the cleanup actions due to the necessity to install remediation wells along Auburn Way South adjacent to buried utilities, and the handling of chemicals under Alternative 3.

6.2.2 Permanence

Groundwater cleanup Alternatives 1 and 2 are permanent and irreversible treatment processes. However, there is a higher degree of certainty that Alternative 2 would achieve cleanup

standards within an acceptable timeframe. Secondary contaminants could potentially be generated from chemical injection activities under Alternative 3. In addition, rebound of contaminant concentrations in groundwater has been documented at some sites following chemical injection, due to desorption from the soil matrix.

6.2.3 Cost

The estimated cost to implement groundwater cleanup Alternative 1 is $715,000. The high cost is due to the long estimated restoration time frame of 20 years or more. The estimated cost to implement groundwater cleanup Alternative 2 is $605,000. The estimated cost to implement groundwater cleanup Alternative 3 is $689,000.

6.2.4 Long-Term Effectiveness

Groundwater cleanup Alterative 2 uses a technology that has been proven to be successful for treatment of petroleum hydrocarbons in groundwater at the Site. There is a high degree of uncertainty regarding the effectiveness of groundwater cleanup Alternative 3, due in part to the high groundwater velocity and the relatively thin smear zone that could limit the residence time of the injected chemicals in the targeted subsurface depths and areas. The anaerobic subsurface conditions documented at the Site likely would result in a long restoration time frame under groundwater cleanup Alternative 1.

6.2.5 Management of Short-Term Risks

There are very low short-term risks associated with implementation of groundwater cleanup Alternative 1. The short-term risks under groundwater cleanup Alternatives 2 and 3 are higher than those under Alternative 1 because of the drilling and construction activities proximate to a busy thoroughfare, and management of the waste soil generated. Alternative 3 has the highest short-term risk due to the use of chemical oxidants injected under pressure during implementation of the alternative.

6.2.6 Technical and Administrative Implementability

All three groundwater cleanup alternatives are technically implementable. Alternative 1 may not meet regulatory requirements due to the long projected restoration time frame. Drilling, construction, and injection activities associated with implementation of Alternatives 2 and 3 would locally disrupt business activities, primarily parking availability, in areas of the Site for several weeks. However, post-construction activities should not affect existing business operations.

6.2.7 Consideration of Public Concerns

All three groundwater cleanup alternatives could restrict use of the upper aquifer until cleanup standards are achieved. However, the upper aquifer is not used as a drinking water source as discussed in the Remedial Investigation Report (Farallon 2011b), and an environmental covenant is already in place for the Firehouse Square properties northeast of Auburn Way South (King County Tax Parcel No. 1821059324 and No. 1821059166) (Figure 3) portion of the Site

northeast of Auburn Way South. Alternative 1 may not gain public acceptance due to the projected long restoration time frame.

6.3 DISPROPORTIONATE COST ANALYSIS RESULTS FOR GROUNDWATER CLEANUP ALTERNATIVES

To perform the disproportionate cost analysis, the probable cost estimated for each cleanup alternative was divided by the MTCA benefit ranking determined for the alternative to develop a probable cost per MTCA benefit value. The resulting cost per MTCA benefit thus derived for each alternative for cleanup of groundwater is shown on Figure 9. Groundwater cleanup Alternative 2 had the lowest cost per MTCA benefit ratio at $71,000 per benefit value, followed by Alternative 3 at $94,000 per benefit value, and Alternative 1 at $102,000 per benefit value. Because groundwater cleanup Alternative 2 was the least expensive and had the highest MTCA benefit ranking of the three alternatives evaluated, no further analysis of disproportionate cost for groundwater cleanup is necessary for the Site.

7.0 DISPROPORTIONATE COST ANALYSIS FOR SOIL CLEANUP ACTION ALTERNATIVES

To determine whether the cleanup action alternatives for soil provide permanent solutions to the maximum extent practicable, a disproportionate cost analysis was performed in accordance with WAC 173-340-360(3)(e). The following sections present the disproportionate cost analysis for the cleanup action alternatives retained for soil. To provide a quantitative means for performing the disproportionate cost analysis for soil cleanup alternatives, Farallon followed the same criteria ranking and weighting methodology used for the disproportionate cost analysis for groundwater, described in Section 6.1, Evaluation Criteria. Table 5 presents the values of the MTCA evaluation criteria, the weighting factor, and the calculated cumulative benefit ranking for each soil cleanup action alternative. A summary of estimated costs for each soil cleanup alternative is presented in Table 6.

Figure 10 presents a graphic representation of the overall benefit ranking and estimated cost for each soil cleanup alternative, along with the relative cost per environmental benefit for each alternative derived following the method used for groundwater, described in Section 6.3, Disproportionate Cost Analysis Results for Groundwater Cleanup Alternatives. A discussion of each of the evaluation criteria for the disproportionate cost analyses for soil cleanup action alternatives follows.

7.1 COMPARISON OF SOIL CLEANUP ALTERNATIVES

7.1.1 Protectiveness

Soil cleanup Alternatives 1 and 2 have a similar degree of reduction in risk. Alternative 1 would place restrictions on contact and handling of contaminated soil through placement of environmental covenants and require regulatory notification for soil disturbance. The restoration time frame is shorter for Alternative 2; however, this criterion is not relevant for an institutional control scenario. Soil cleanup Alternative 2 has higher on- and off-Site risks to workers associated with implementation because this alternative consists of excavation of contaminated soil adjacent to the C Street Southeast roadway, buried utilities, and the CHS Auburn store building, and transport of the material to a landfill or treatment facility.

7.1.2 Permanence

Soil cleanup Alternatives 1 and 2 have a similar degree of reduction in toxicity in that both ultimately rely on biodegradation to reduce concentrations of COCs in soil. With soil cleanup Alternative 1, degradation would occur by in-situ natural attenuation processes, whereas with Alternative 2, biodegradation presumably would occur at an authorized disposal facility. Groundwater monitoring data indicate that residual concentrations of COCs in soil are not migrating to groundwater on the CHS facility property, so reduction in mobility is not relevant for either alternative. Alternative 2 is a more-permanent cleanup action alternative with regard to the Site because of the removal of the mass of contaminants from the Site. The actual mass would not be reduced, however, but simply relocated off-Site to an authorized disposal facility.

7.1.3 Cost

The estimated cost to implement soil cleanup Alternative 1 is $40,900. The estimated cost to implement Alternative 2 is $651,000.

7.1.4 Long-Term Effectiveness

Soil cleanup Alterative 1 requires recording an environmental covenant on the property deed to restrict disturbance of soil above 15 feet bgs at areas of the CHS Auburn facility property and within the C Street right-of-way without prior approval from Ecology. Therefore, the effectiveness of Alternative 1 depends on administration and enforcement of the covenant. Soil cleanup Alternative 2 relies on off-Site disposal in a licensed, engineered, and monitored facility.

7.1.5 Management of Short-Term Risks

There are no short-term risks associated with implementation of soil cleanup Alternative 1. The short-term risks under soil cleanup Alternative 2 are higher, and are related to excavation, shoring, and transport of contaminated soil as well as an initial soil investigation. Excavation or soil sampling activities adjacent to or in C Street Southeast would require traffic control to mitigate risks to the public.

7.1.6 Technical and Administrative Implementability

Both alternatives for cleanup of soil are technically implementable. Soil cleanup Alterative 1 requires recording an environmental covenant on the property deeds to restrict disturbance of soil above 15 feet bgs at areas of the CHS Auburn facility property and within the C Street Southeast right-of-way. Alternative 1 would require cooperation from the City of Auburn for recording the environmental covenant on the right-of-way property. The City of Auburn was been cooperative for granting access agreements for work with the right-of-ways at the Site during previous investigation and cleanup activities so recording an environmental covenant should be technically and administratively implementable. Alternative 2 would require engineering controls during implementation to protect buried utilities adjacent to C Street Southeast and the CHS store building. Alternative 2 would also likely require closure of C Street Southeast during excavation and backfilling activities, and re-routing of traffic during implementation.

7.1.7 Consideration of Public Concerns

Soil cleanup Alternative 1 may result in the long-term presence of contaminated soil on the CHS facility property and C Street Southeast right-of-way, which could raise a public concern. Soil cleanup Alternative 2 could block business access for the CHS property and cause traffic interruptions on C Street Southeast during implementation.

7.2 DISPROPORTIONATE COST ANALYSIS RESULTS FOR SOIL CLEANUP ALTERNATIVES

To perform the disproportionate cost analysis for soil cleanup alternatives, the alternatives were compared by dividing the estimated cost by the MTCA benefit ranking derived for each alternative. The resulting cost per MTCA benefit thus derived for each alternative for cleanup of

soil is shown on Figure 10. The analyses showed that the incremental cost for soil cleanup Alternative 2 was disproportionate to the incremental MTCA benefit gained when compared to Alternative 1. The cost per MTCA benefit for soil cleanup Alternative 2 at $83,500 per MTCA benefit is nearly 15 times greater than the cost per MTCA benefit ratio of $5,600 per benefit for soil cleanup Alternative 1.

8.0 PREFERRED CLEANUP ALTERNATIVES

Groundwater cleanup Alternative 2, enhanced AS with targeted SVE, was selected as the preferred cleanup alternative for groundwater for the Site. Soil cleanup Alternative 2, institutional controls, was selected as the preferred cleanup alternative for soil for the Site. Additional discussion of the preferred alternatives and MTCA cleanup selection criteria are provided below for both media.

8.1 GROUNDWATER

8.1.1 Description of Selected Cleanup Alternative for Groundwater

The selected cleanup alternative for groundwater consists of installation of additional AS wells on the WSIADA and Thai Restaurant properties south of the intersection of 7th Street Southeast and Auburn Way South and along the southwest side of the Auburn Way South right-of-way. AS and SVE operations at the Site have greatly reduced the concentrations of COCs in groundwater and the size of the groundwater plume where COC concentrations exceed MTCA Method A cleanup levels (Figures 4 through 6). It is anticipated that expansion of the AS/SVE system will further reduce concentrations of COCs in areas down-gradient but beyond the area of influence of current AS wells. The additional AS wells would be spaced closer than existing AS wells on the Site to ensure overlapping areas of influence from each AS well, and would target treatment of groundwater in the area of monitoring wells CMW-10 and CMW-27, extending to the area of monitoring well CMW-12. Several SVE wells would be installed on the WSIADA property for collection of volatile organic compound vapors and mitigation of potential risk of vapor intrusion into the WSIADA building as a result of AS activities. Operation of the SVE wells will not only control vapors during the air sparging operations but also reduce concentrations of volatile petroleum hydrocarbons constituents in smear zone soils. A line of AS wells would be installed using angle-drilling methods, as feasible, so that wells screens would be located beneath Auburn Way South to facilitate remediation of groundwater and smear zone soil under the roadway. Select existing AS wells also would be used for sparging as part of the cleanup alternative. A conceptual plan of the additional AS and SVE wells is provided on Figure 11.

Air sparging should reduce the mass and concentrations of volatile COCs in groundwater faster and more effectively than less volatile petroleum hydrocarbons such as DRO. An evaluation of modifications to the operating mode of the treatment would be undertaken after 2 to 3 years of operation if the reconfigured AS/SVE system demonstrably reduces COC concentrations but does not achieve the cleanup levels for groundwater. At that point, the COC concentrations in groundwater, contaminant removal mass and rates, SVE performance data, and groundwater geochemical parameters would be reviewed to determine whether a reduced air flow enhanced bioaugmentation operational mode or monitored natural attenuation would be effective at achieving cleanup standards in a reasonable restoration time frame. A natural attenuation study likely would require a shutdown of the AS system for four consecutive quarters of groundwater monitoring in accordance with Ecology guidance for performing monitored natural attenuation studies. Assuming that GRO and BTEX concentrations will be lower than pre-cleanup

concentrations after 1 or more years of AS/SVE system operation, vapor intrusion into nearby buildings should not be a concern with the SVE system off during the natural attenuation evaluation. The results of the sub-slab soil gas sampling conducted at the WSIADA building in 2012 in the area of the Site with the highest concentrations of BTEX constituents in groundwater at the time, indicated that the concentrations of BTEX constituents in soil gas beneath the building did not pose an unacceptable risk for human health via the vapor intrusion pathway.

If the concentrations of GRO and BTEX constituents in groundwater are effectively reduced to below Site cleanup levels, but residual DRO concentrations do not show reductions that demonstrate a reasonable restoration timeframe can be achieved (i.e. 5 years) it may be necessary to implement an institutional control in the form of an environmental covenant to restrict groundwater use in the area of Site where DRO concentrations in groundwater exceed cleanup levels.

8.1.2 Compliance with Minimum Requirements for Cleanup Actions

The following sections describe how the preferred cleanup action for groundwater will comply with the threshold requirements for cleanup actions in accordance with WAC 173-340-360(2)(a).

8.1.2.1 Protection of Human Health and the Environment

The selected cleanup action for groundwater is expected to protect human health and the environment by stripping volatile COCs and oxygenating groundwater in the area of the Site where residual concentrations of COCs in groundwater exceed MTCA Method A cleanup levels for unrestricted land use. The air sparging will promote aerobic degradation of petroleum hydrocarbons in the area down-gradient of the area of influence of the currently configured treatment system. Several SVE wells will be installed to capture soil gas that may be mobilized from AS operations, and thereby mitigate potential vapor intrusion risk to nearby buildings.

8.1.2.2 Compliance with Cleanup Standards

The preferred cleanup alternative is expected to comply with cleanup standards by meeting MTCA Method A cleanup levels at the point of compliance for groundwater. An evaluation of modifications to the operating mode of the treatment system would be undertaken after 2 to 3 years of operation, as described in Section 8.1.1, Description of Selected Cleanup Alternative for Groundwater, if the reconfigured AS/SVE system demonstrably reduces COC concentrations but does not achieve the cleanup levels for groundwater.

8.1.2.3 Compliance with Applicable State and Federal Laws

The preferred cleanup action is expected to comply with the applicable or relevant and appropriate requirements presented in Table 2 and discussed in Section 4, Cleanup Action Objectives and Cleanup Standards. The cleanup action will be conducted under a Consent Decree or Agreed Order and in accordance with the requirements of MTCA.

8.1.2.4 Provision for Compliance Monitoring

The preferred cleanup action will provide for compliance monitoring by continued periodic monitoring and sampling of selected groundwater monitoring wells until compliance with cleanup standards for groundwater has been achieved. The Cleanup Action Plan for the Site will provide the monitoring requirements.

8.1.3 Other Requirements

A discussion of how the preferred cleanup alternative will meet the other minimum requirements for cleanup actions found in WAC 173-340-360(2)(b) is provided below.

8.1.3.1 Use of Permanent Solutions to the Maximum Extent Practicable

The evaluation of the use of permanent solutions to the maximum extent possible was provided in Section 6, Disproportionate Cost Analysis for Groundwater Cleanup Action Alternatives. The analysis determined that the preferred cleanup alternative is permanent to the maximum extent practicable by considering the evaluation criteria for a disproportionate cost analysis. The preferred cleanup alternative was determined to be both the lowest cost and the most permanent of the groundwater cleanup alternatives retained for evaluation.

8.1.3.2 Provision for a Reasonable Restoration Time Frame

Under WAC 173-340-360(4), a cleanup action must be completed within a reasonable time frame. The restoration time frame for the preferred cleanup alternative is estimated to be 2 to 5 years based on the performance of the AS/SVE systems at the Site to date and current COC concentrations and distribution in groundwater. The projected restoration time frame is reasonable when considering the nature and extent of contamination at the Site To assess whether the preferred cleanup action for groundwater provides for a reasonable restoration time frame, the following factors were considered.

- **Potential risk to human health and the environment**—The Site poses a low risk to human health and the environment, as no completed groundwater exposure pathway currently exists.
- **Practicability of achieving a shorter time frame**—It is not practicable to achieve a shorter restoration time frame given the subsurface conditions and nature and extent of COCs in smear zone soil and groundwater.
- **Current or potential future use of the Site, surrounding areas, and associated resources that are or may be affected by releases from the Site**—The Site is zoned and used for commercial purposes. Given the proximity to major roadways, State Route 18, and Auburn Way South, it is likely to remain commercial for the foreseeable future.
- **Availability of alternate water supplies**—Groundwater from the upper aquifer is not used as a drinking water source at the Site. Therefore, this factor is not applicable to the Site.

- **Likely effectiveness and reliability of institutional controls**—The preferred cleanup alternative for groundwater should not require additional institutional controls at the Site. An environmental covenant prohibiting withdrawal of groundwater is already in place for Firehouse Square properties northeast of Auburn Way South (King County Tax Parcel No. 1821059324 and No. 1821059166). Environmental covenants were not recorded for other properties at the Site during the previous 18 years of interim cleanup activities and the projected restoration timeframe of 2 to 5 years for the preferred cleanup alternative should not require additional restrictions on groundwater use. If GRO and BTEX concentrations in groundwater are reduced to below Site cleanup levels but cleanup levels cannot be achieved for DRO in groundwater, it may be necessary to implement an institutional control in the form of an environmental covenant prohibiting withdrawal of groundwater for the area of the Site where DRO concentrations in groundwater exceed cleanup levels.
- **Ability to control and monitor contaminant migration**—The potential migration of contaminants in soil gas will be controlled by extracting soil gas through SVE wells and the potential migration of contaminants in groundwater will be monitored as part of the periodic compliance monitoring to be conducted throughout the cleanup action.
- **Potential for contaminant degradation over time**—The degradation of COCs in soil and groundwater at the Site has been achieved and documented using cleanup technologies at the Site that are recommended for cleanup of groundwater. There is also evidence that residual COC concentrations in groundwater down-gradient of the current treatment system are naturally attenuating. The toxicity of the COCs in groundwater and smear zone soil will be reduced as the concentrations are diminished by degradation processes both during and following implementation of the cleanup action.

8.1.3.3 Consideration of Public Concerns

Implementation of the cleanup action for groundwater will be conducted under an Agreed Order or Consent Decree with Ecology. Public concerns will be considered through the public review of the Consent Decree or Agreed Order and the Draft Cleanup Action Plan. The Consent Decree or Agreed Order, the Draft Cleanup Action Plan, and any other associated substantive requirements will be available for public review and comment prior to commencement of cleanup activities. All public comments will be evaluated by Ecology following the public review period, and Ecology will determine whether modifications to the proposed cleanup action are warranted.

8.2 SOIL

8.2.1 Description of Preferred Cleanup Alternative for Soil

The preferred cleanup alternative for soil would require recording an environmental covenant or covenants on the property deeds for the areas of the Site where soil at depths of less than 15 feet

bgs contains concentrations of COCs exceeding applicable MTCA cleanup levels. These areas include the east and west perimeter of the 1998 excavation at the bulk fuel storage area and at the former location of heating oil Tank H-1, which was removed in 1998 (Figure 8). The environmental covenant likely would require notification of Ecology if soil were disturbed in these areas, and perhaps maintenance of existing asphalt and concrete surfaces.

8.2.2 Compliance with Minimum Requirements for Cleanup Actions

The following sections describe how the preferred cleanup action for soil will comply with the threshold requirements for cleanup actions in accordance with WAC 173-340-360(2)(a).

8.2.2.1 Protection of Human Health and the Environment

An environmental covenant restricting soil disturbance is expected to be enacted for soil shallower than 15 feet bgs where COCs have been detected at concentrations exceeding MTCA Method A cleanup levels for soil for unrestricted land use. The 15-foot-bgs depth is a reasonable estimate of the depth of soil that could be excavated and distributed at the soil surface as a result of Site development activities in accordance with WAC 173-340-740(6)(d). Any residual concentrations of COCs that may be in soil above 15 feet bgs at the Site are protective of the migration to groundwater pathway, as demonstrated by the groundwater results for samples collected from the monitoring wells on, cross-gradient, and down-gradient of the CHS Auburn facility.

8.2.2.2 Compliance with Cleanup Standards

The preferred cleanup alternative is expected to comply with cleanup standards by the recording of an environmental covenant, which will include institutional controls to restrict direct contact with soil containing concentrations of COCs exceeding Site cleanup levels.

8.2.2.3 Compliance with Applicable State and Federal Laws

The preferred cleanup action for soil is expected to comply with the applicable or relevant and appropriate requirements presented in Section 4, Cleanup Action Objectives and Cleanup Standards. The cleanup action will be conducted under a Consent Decree or Agreed Order, in accordance with the requirements of MTCA. Any residual concentrations of COCs in soil that may be in excess of MTCA Method A cleanup levels will remain in portions of the CHS Auburn facility and potentially in the C Street Southeast right-or-way, although environmental covenants will be recorded to prevent exposure to contaminated soil.

8.2.2.4 Provision for Compliance Monitoring

The preferred cleanup action will provide for compliance monitoring by continued periodic monitoring and sampling of selected groundwater monitoring wells until compliance with cleanup standards for groundwater has been achieved as described in Section 8.1.2.4, Provision for Compliance Monitoring. The Cleanup Action Plan for the Site will provide the compliance monitoring requirements. Any residual concentrations

of COCs in soil above 15 feet bgs are not causing MTCA Method A cleanup levels to be exceeded in groundwater via the migration to groundwater pathway. Therefore, compliance monitoring of groundwater should no longer be required once the groundwater cleanup standards have been met.

8.2.3 Other Requirements

A discussion of how the preferred cleanup alternative will meet the other minimum requirements for cleanup actions found in WAC 173-340-360(2)(b) is provided below.

8.2.3.1 Use of Permanent Solutions to the Maximum Extent Practicable

The evaluation of the use of permanent solutions to the maximum extent practicable was provided in Section 7, Disproportionate Cost Analysis for Soil Cleanup Alternatives. Soil cleanup Alternative 2 was determined to be more permanent than Alternative 1 because it removes contaminated soil from the Site. However, the incremental cost of soil cleanup under Alternative 2 over Alternative 1 substantially exceeds the incremental benefit that would be achieved, and so is disproportionate to the benefits. Considering both the difficulties associated with accessing any soil containing residual concentrations of COCs exceeding Site cleanup levels and the results of quarterly groundwater monitoring confirming that residual concentrations of COCs in soil above 15 feet bgs are not contributing to groundwater contamination, the institutional controls alternative provides a permanent remedy within the limits of practicability that meets the threshold requirements of MTCA.

8.2.3.2 Provision for a Reasonable Restoration Time Frame

Under WAC 173-340-360(4), a cleanup action must be completed within a reasonable time frame. To assess whether the preferred cleanup action for soil provides for a reasonable restoration time frame, the following factors were considered.

- **Potential risk to human health and the environment**—The Site poses a low risk to human health and the environment, as no completed exposure pathways currently exist. The preferred cleanup alternative for soil mitigates potential risk to human health and the environment by placing institutional controls to preclude completion of the direct contact exposure pathway for soil at the Site.
- **Practicability of achieving a shorter time frame**—While Alternative 2 would achieve cleanup objectives in a shorter time frame, it is not practical and is disproportionate in cost. The preferred cleanup alternative will achieve cleanup time frame objectives to the greatest extent practicable.
- **Current or potential future use of the Site, surrounding areas, and associated resources that are or may be affected by releases from the Site**—The Site is zoned and used for commercial purposes. Given the proximity to major roadways, State Route 18, and Auburn Way South, it is likely to remain commercial for the foreseeable future.

- **Availability of alternate water supplies**—Groundwater from the upper aquifer is not used as a drinking water source at the Site. Therefore, this factor is not applicable to the Site.
- **Likely effectiveness and reliability of institutional controls**—Institutional controls are an effective and reliable means to prevent exposure to COCs in soil at the Site. The CHS facility property is privately owned, and an environmental covenant can be recorded with the property deed. Similarly, an agreement can be enacted with the City of Auburn for an environmental covenant for the C Street Southeast right-of-way.
- **Ability to control and monitor contaminant migration**—Any residual soil contamination at depths of less than 15 feet bgs is highly weathered, non-mobile, and located beneath impermeable surfaces. Concentrations of COCs exceeding MTCA Method A cleanup levels for groundwater or laboratory detection limits have not been detected in groundwater samples collected in and down-gradient of the areas of residual soil contamination for over 4 years. Use of the CHS convenience store building and the C Street Southeast right-of-way is controlled by the property owner and the City of Auburn, respectively.
- **Potential for Contaminant degradation over time**—The nature of the COCs in soil and comparison of recent versus historical soil analytical data indicate that degradation is occurring and likely will continue to occur over time.

The restoration time frame for natural attenuation of COCs in vadose zone soil to below MTCA Method A cleanup levels is currently undefined and likely exceeds 10 years. The concentrations of COCs detected in soil samples collected at the CHS facility in 2007 and 2008 were considerably lower than the concentrations detected following the 1998 excavation activities, suggesting that natural attenuation of petroleum hydrocarbons is occurring in Site soil. However, the soil samples collected in 2007 and 2008 were from the smear zone rather than from depths of less than 15 feet bgs, so the attenuation processes that may be degrading the COCs in these two different depth zones may differ because of the higher moisture content at depth.

8.2.3.3 Consideration of Public Concerns

Public concerns will be considered through the public review of the Consent Decree or Agreed Order and the Draft Cleanup Action Plan. The Consent Decree or Agreed Order, the Draft Cleanup Action Plan, and any other associated substantive requirements will be available for public review and comment before cleanup activities commence. All public comments will be evaluated by Ecology following the public review period, and Ecology will determine whether modifications to the planned cleanup action are warranted.

9.0 CONCLUSION

Based on the MTCA evaluation process for cleanup actions, groundwater cleanup action Alternative 2, enhanced air sparging with targeted soil vapor extraction, was selected as the preferred cleanup alternative for groundwater for the Site. The recommended cleanup alternative for groundwater consists of installation of additional air sparging wells on the WSIADA and Thai Restaurant properties and along the southwest side of the Auburn Way South right-of-way. It is anticipated that expansion of the AS/SVE system will further reduce concentrations of COCs in areas down-gradient but beyond the area of influence of current AS wells. Several SVE wells would be installed on the WSIADA property for collection of volatile organic compound vapors and mitigation of potential risk of vapor intrusion into the WSIADA building as a result of AS activities. Select existing AS wells also would be used for sparging as part of the cleanup alternative.

The restoration time frame for the preferred cleanup alternative is estimated to be 2 to 5 years based on the performance of the AS/SVE systems at the Site to date and current COC concentrations and distribution in groundwater. An evaluation of modifications to the operating mode of the treatment would be undertaken after 2 to 3 years of operation if the reconfigured AS/SVE system demonstrably reduces COC concentrations but does not achieve the cleanup levels for groundwater. At that point, the COC concentrations in groundwater, contaminant removal mass and rates, SVE performance data, and groundwater geochemical parameters would be reviewed to determine whether a reduced air flow enhanced bioaugmentation operational mode or monitored natural attenuation would be effective at achieving cleanup standards in a reasonable restoration time frame.

The disproportionate cost analysis for soil indicated that the cost per MTCA benefit determined for soil cleanup Alternative 2, excavation and off-Site disposal of soil is nearly 15 times greater than the cost per MTCA benefit ratio for soil cleanup Alternative 1, institutional controls, and is disproportionate in cost relative to the incremental benefits gained from soil cleanup Alternative 2 over Alternative 1. Therefore, soil cleanup Alternative 2, institutional controls, was selected as the preferred cleanup alternative for soil for the Site.

The preferred cleanup alternative for soil would require recording of an environmental covenant or covenants covering the areas of the Site where soil at depths of less than 15 feet bgs contain concentrations of COCs exceeding MTCA cleanup levels. These areas include the east and west perimeter of the 1998 excavation at the bulk fuel storage area and at the former location of heating oil UST H-1.

10.0 REFERENCES

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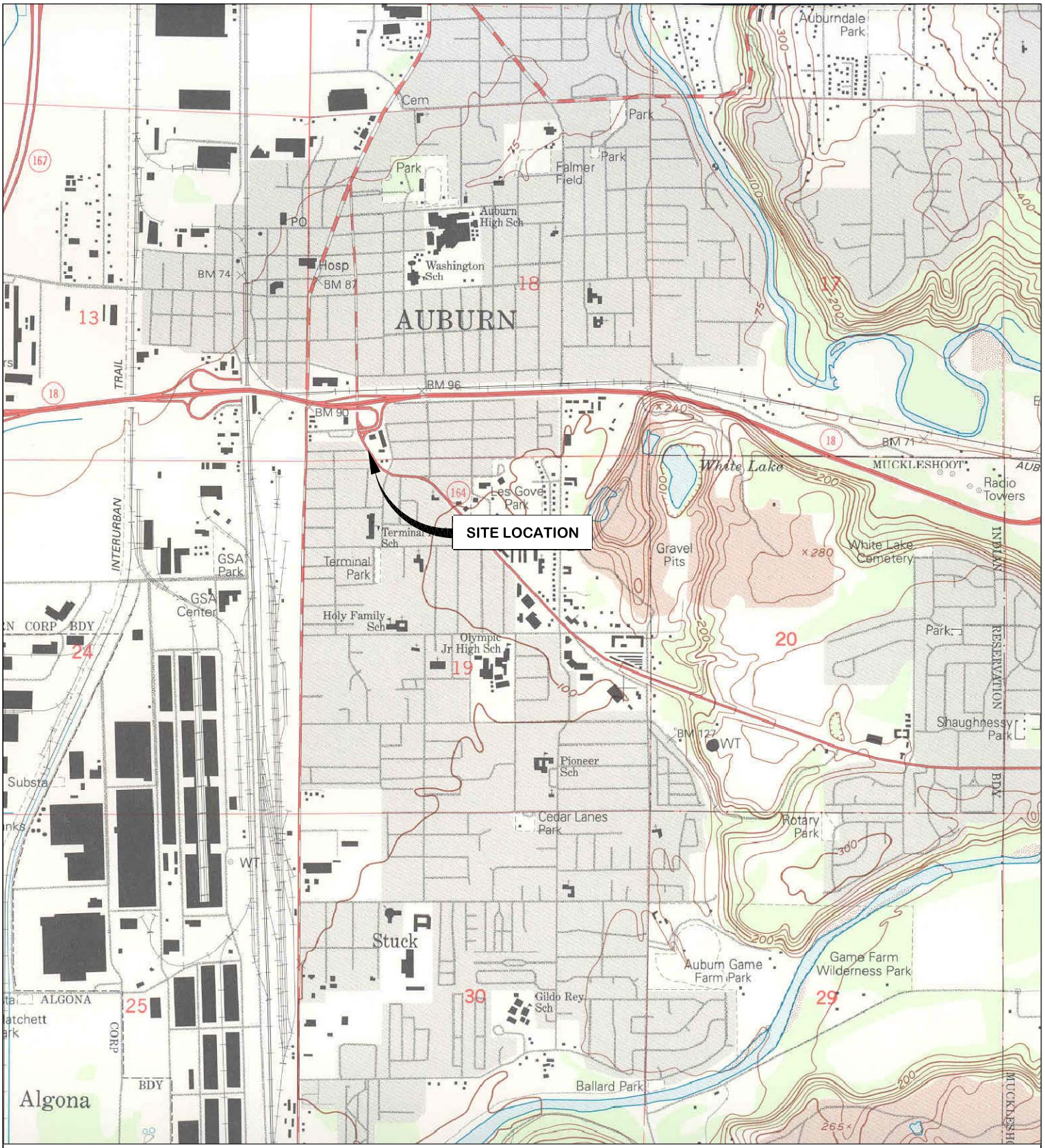
Washington State Department of Ecology (Ecology). 2010. *Review Comments on Remedial Investigation Report CHS Auburn Site (December 17, 2009 Draft) by Farallon Consulting, L.L.C.* October 25.

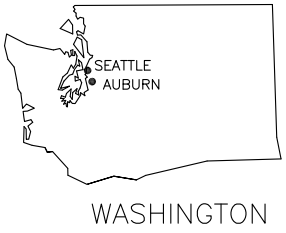
FIGURES

FEASIBILITY STUDY
CHS Auburn Site
Auburn, Washington

Farallon PN: 301-004



REFERENCE: 7.5 MINUTE USGS QUADRANGLE AUBURN, WASHINGTON. DATED 1949 AND PHOTOREVISED 1994



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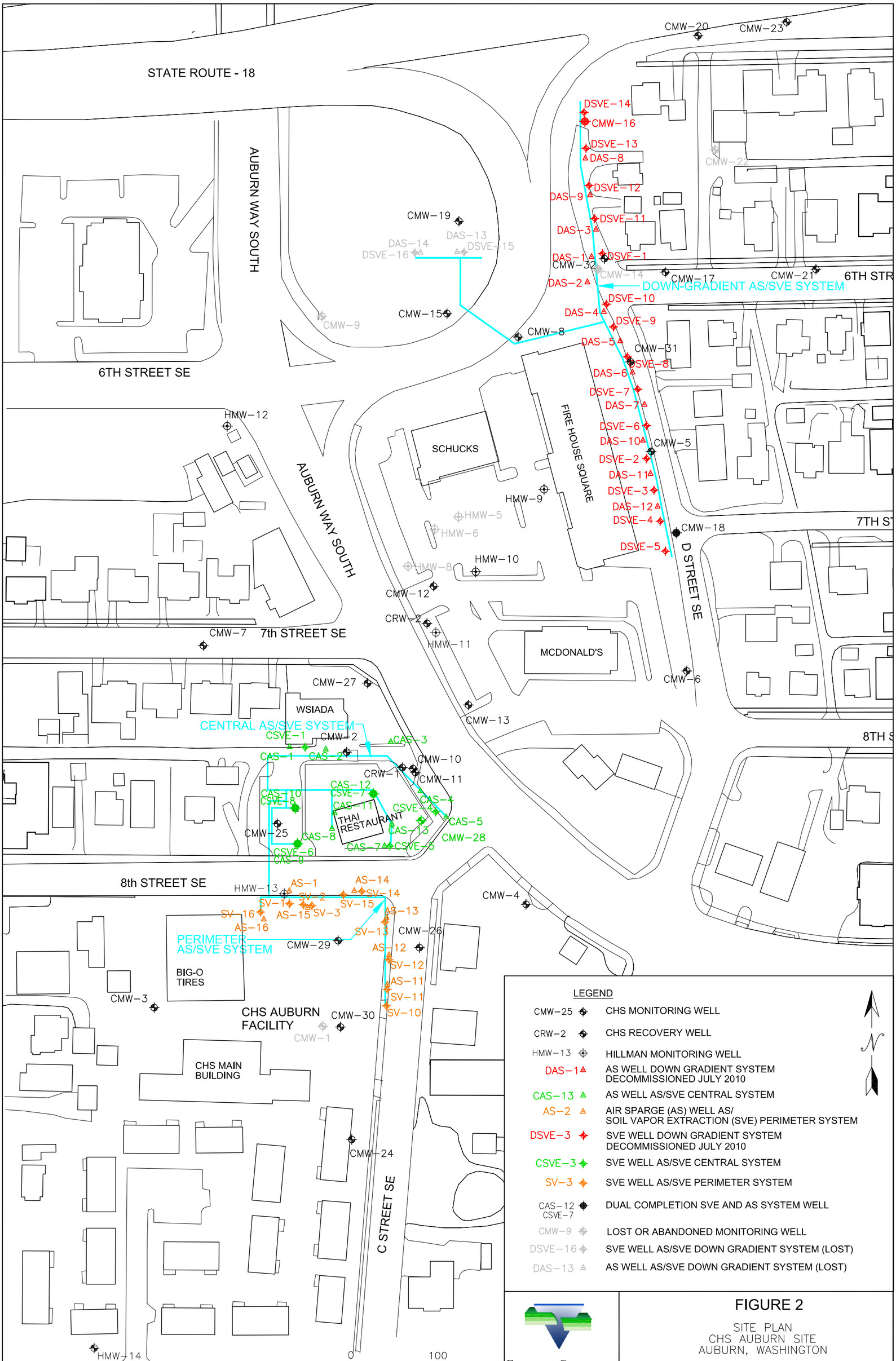
Issaquah, WA 98027

FIGURE 1

SITE VICINITY MAP
CHS AUBURN SITE
AUBURN, WASHINGTON

FARALLON PN: 301-004

Drawn By: DEW	Checked By: PG	Date: 7/18/08	Disk Reference: 301004b



LEGEND

CMW-25	CHS MONITORING WELL
CRW-2	CHS RECOVERY WELL
HMW-13	HILLMAN MONITORING WELL
DAS-1	AS WELL DOWN GRADIENT SYSTEM DECOMMISSIONED JULY 2010
CAS-13	AS WELL AS/SVE CENTRAL SYSTEM
AS-2	AIR SPARGE (AS) WELL AS/ SOIL VAPOR EXTRACTION (SVE) PERIMETER SYSTEM
DSVE-3	SVE WELL DOWN GRADIENT SYSTEM DECOMMISSIONED JULY 2010
CSVE-3	SVE WELL AS/SVE CENTRAL SYSTEM
SV-3	SVE WELL AS/SVE PERIMETER SYSTEM
CAS-12 CSVE-7	DUAL COMPLETION SVE AND AS SYSTEM WELL
CMW-9	LOST OR ABANDONED MONITORING WELL
DSVE-16	SVE WELL AS/SVE DOWN GRADIENT SYSTEM (LOST)
DAS-13	AS WELL AS/SVE DOWN GRADIENT SYSTEM (LOST)

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FIGURE 2

SITE PLAN
CHS AUBURN SITE
AUBURN, WASHINGTON

FARALLON PN: 301-004

Drawn By: DEW	Checked By: PG	Date: 2/28/13	Disk Reference: 301004f

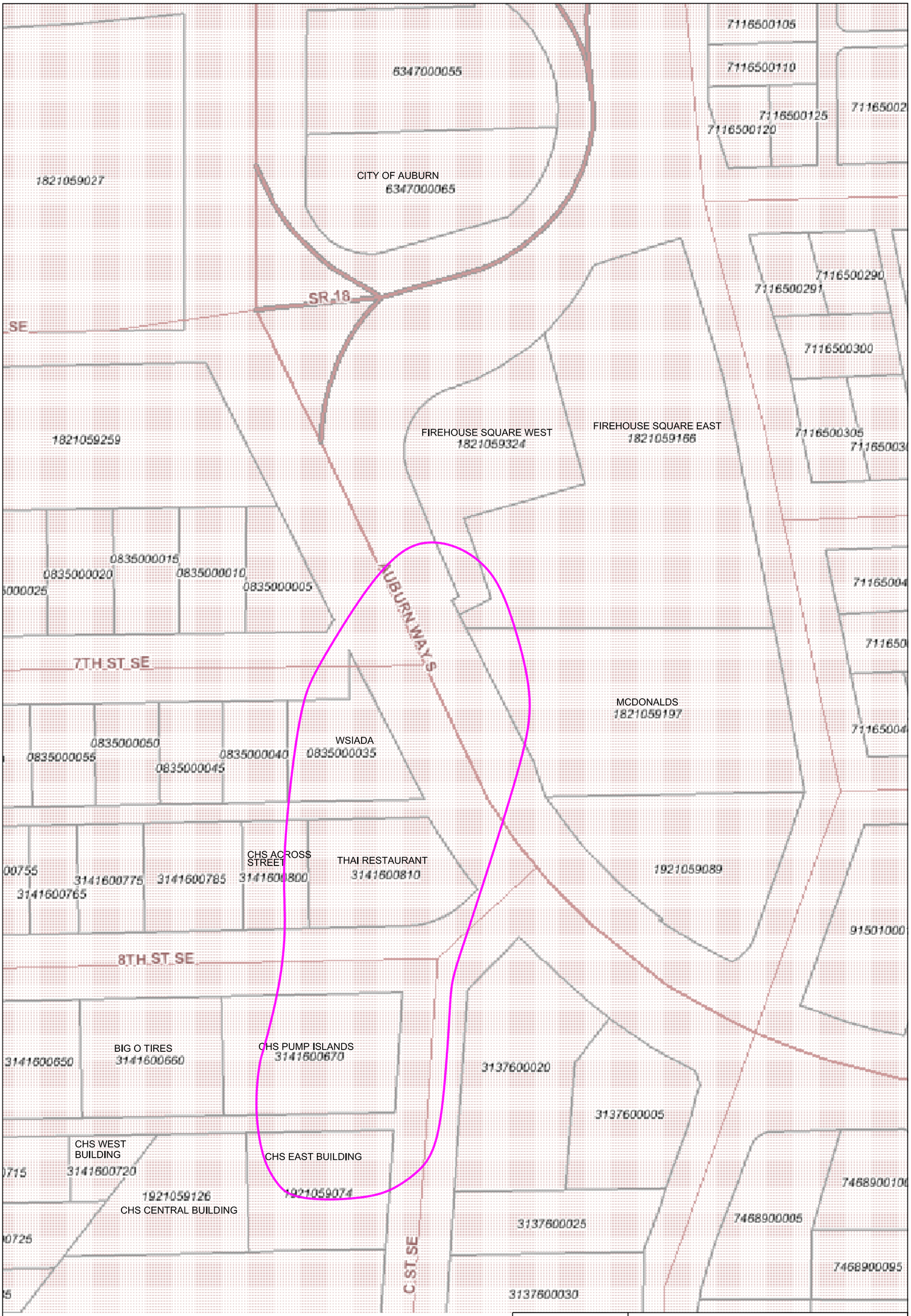

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FIGURE 3

PARCEL MAP
CHS AUBURN SITE
AUBURN, WASHINGTON

FARALLON PN: 301-004

Drawn By: DEW	Checked By: PG	Date: 10/12/12	Disk Reference: 301004b

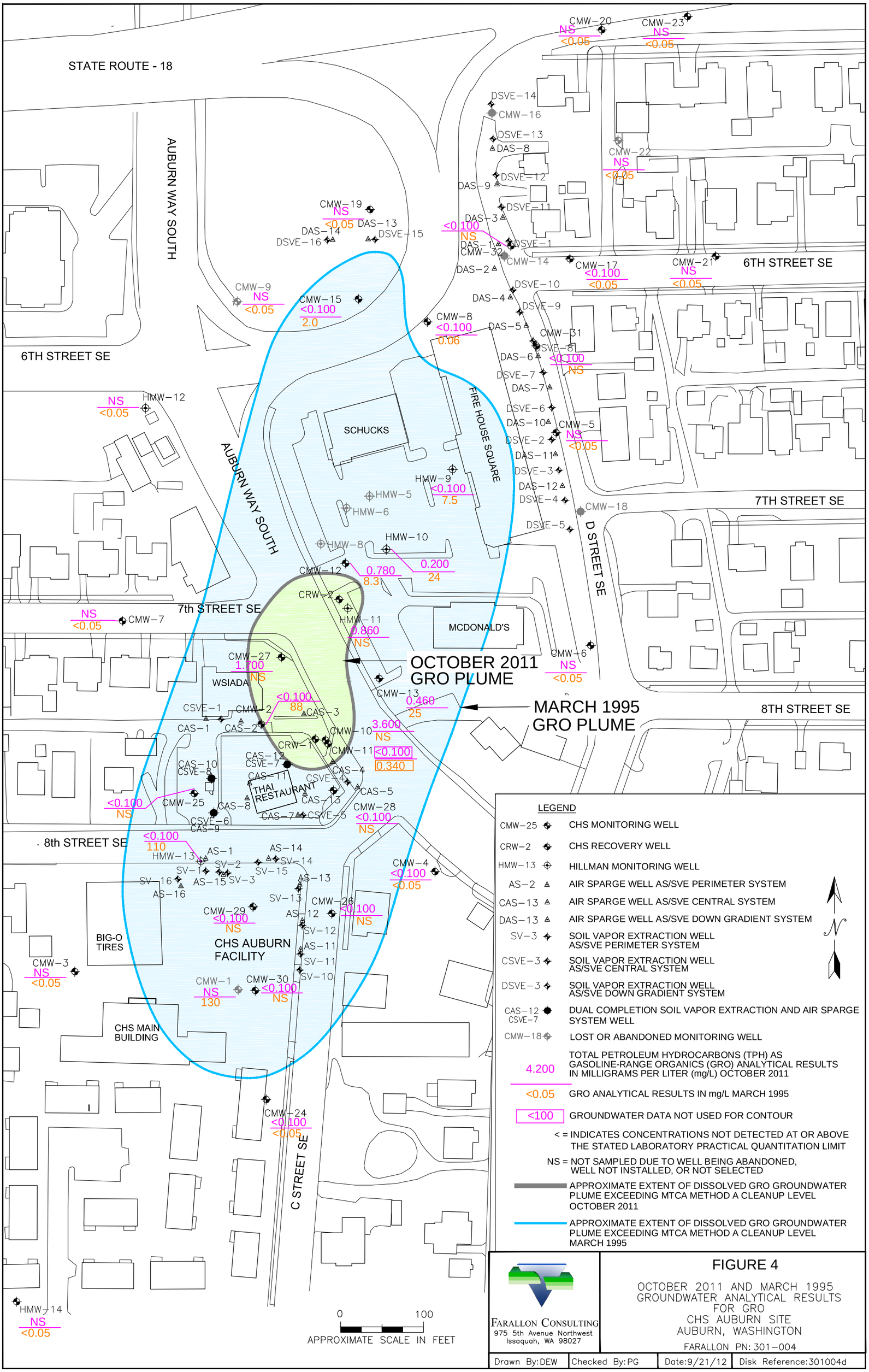

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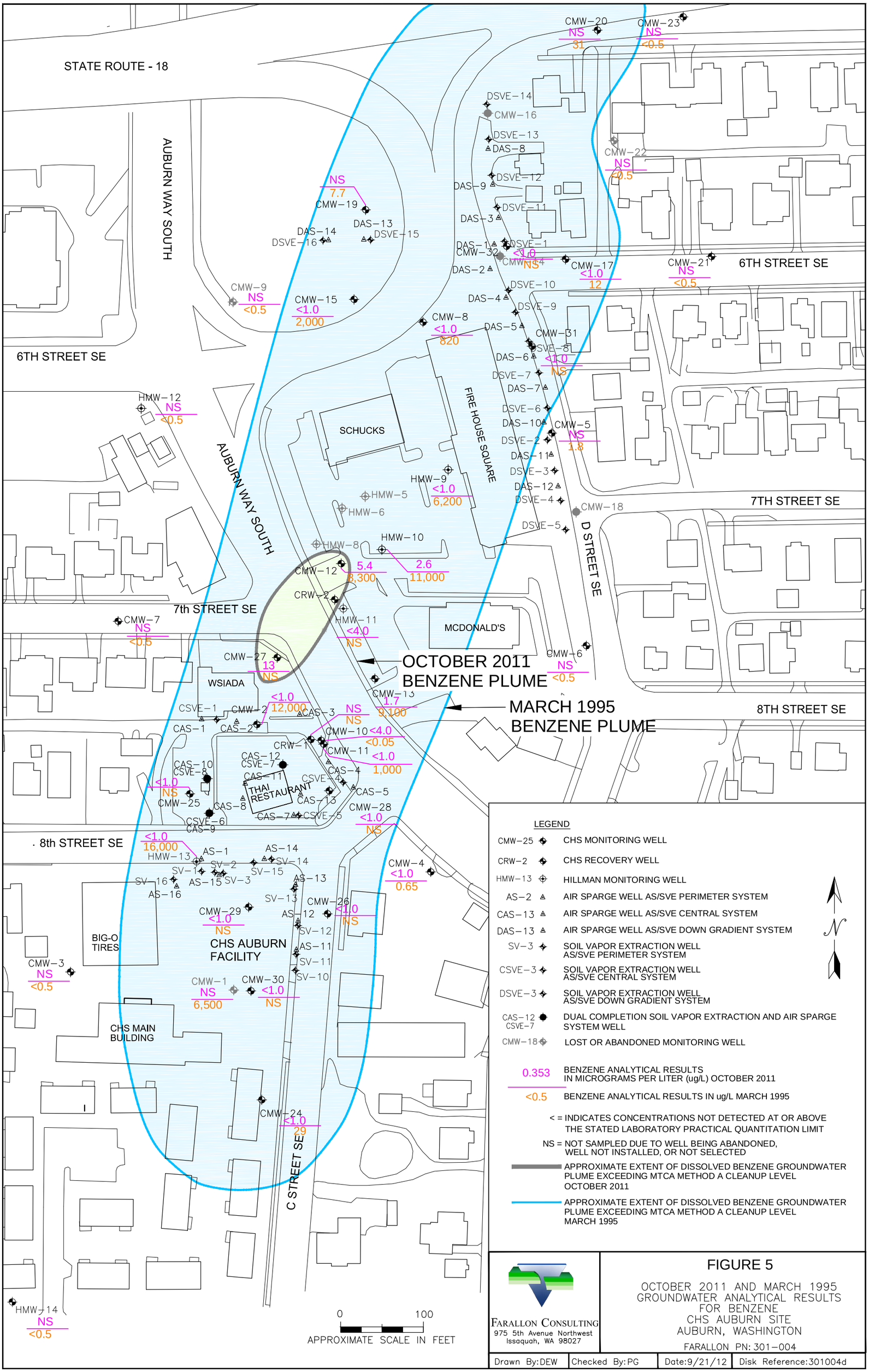
FIGURE 4

OCTOBER 2011 AND MARCH 1995
GROUNDWATER ANALYTICAL RESULTS
FOR GRO
CHS AUBURN SITE
AUBURN, WASHINGTON

FARALLON PN: 301-004

Drawn By: DEW	Checked By: PG	Date: 9/21/12	Disk Reference: 301004d



LEGEND

- CMW-25 — CHS MONITORING WELL
- CRW-2 — CHS RECOVERY WELL
- HMW-13 — HILLMAN MONITORING WELL
- AS-2 — AIR SPARGE WELL AS/SVE PERIMETER SYSTEM
- CAS-13 — AIR SPARGE WELL AS/SVE CENTRAL SYSTEM
- DAS-13 — AIR SPARGE WELL AS/SVE DOWN GRADIENT SYSTEM
- SV-3 — SOIL VAPOR EXTRACTION WELL AS/SVE PERIMETER SYSTEM
- CSVE-3 — SOIL VAPOR EXTRACTION WELL AS/SVE CENTRAL SYSTEM
- DSVE-3 — SOIL VAPOR EXTRACTION WELL AS/SVE DOWN GRADIENT SYSTEM
- CAS-12 / CSVE-7 — DUAL COMPLETION SOIL VAPOR EXTRACTION AND AIR SPARGE SYSTEM WELL
- CMW-18 — LOST OR ABANDONED MONITORING WELL

0.353 — BENZENE ANALYTICAL RESULTS IN MICROGRAMS PER LITER (ug/L) OCTOBER 2011

<0.5 — BENZENE ANALYTICAL RESULTS IN ug/L MARCH 1995

< = INDICATES CONCENTRATIONS NOT DETECTED AT OR ABOVE THE STATED LABORATORY PRACTICAL QUANTITATION LIMIT

NS = NOT SAMPLED DUE TO WELL BEING ABANDONED, WELL NOT INSTALLED, OR NOT SELECTED

APPROXIMATE EXTENT OF DISSOLVED BENZENE GROUNDWATER PLUME EXCEEDING MTCA METHOD A CLEANUP LEVEL OCTOBER 2011

APPROXIMATE EXTENT OF DISSOLVED BENZENE GROUNDWATER PLUME EXCEEDING MTCA METHOD A CLEANUP LEVEL MARCH 1995

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FIGURE 5

OCTOBER 2011 AND MARCH 1995
GROUNDWATER ANALYTICAL RESULTS
FOR BENZENE
CHS AUBURN SITE
AUBURN, WASHINGTON

FARALLON PN: 301-004

Drawn By: DEW	Checked By: PG	Date: 9/21/12	Disk Reference: 301004d

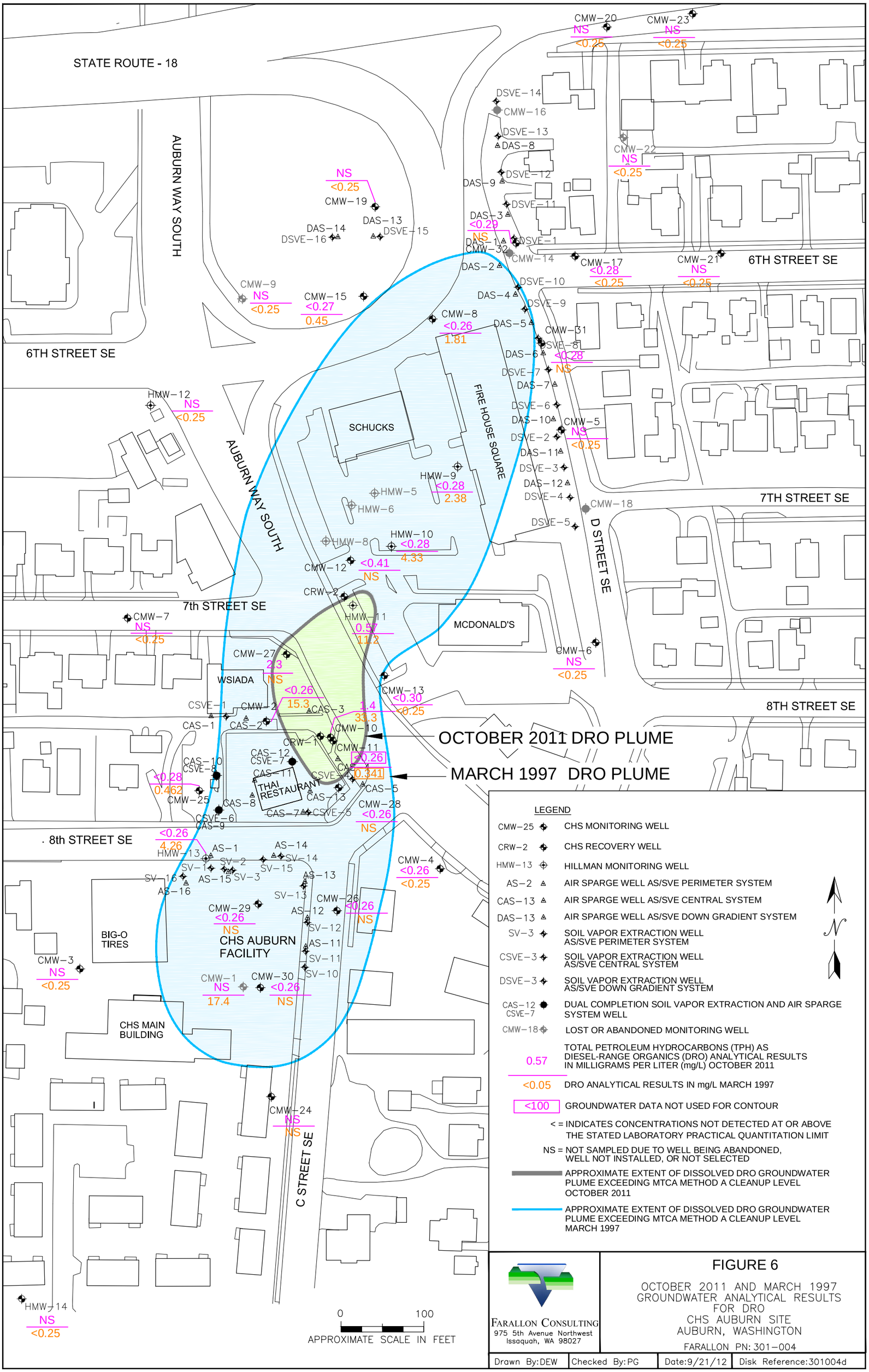

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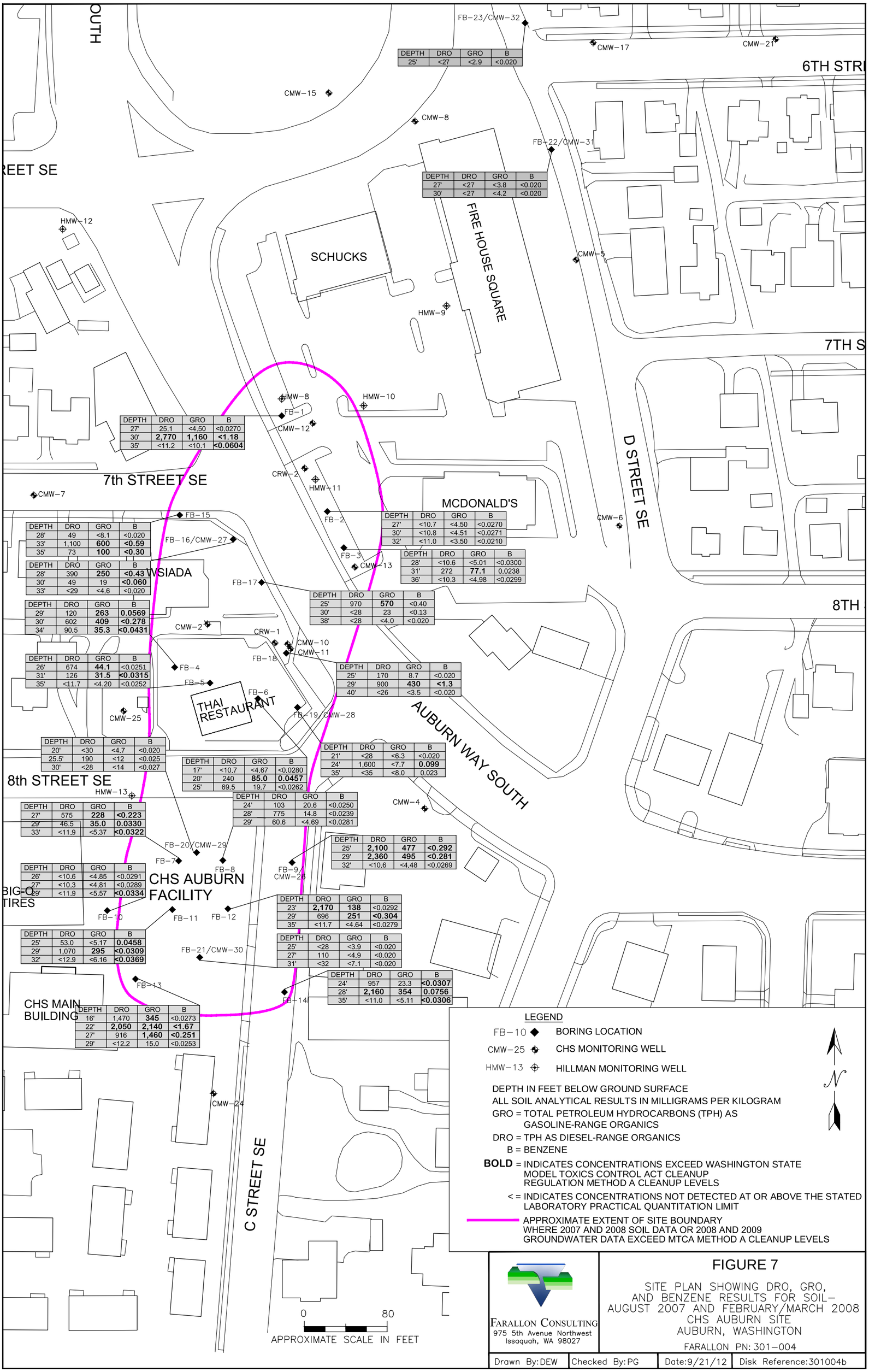
FIGURE 6

OCTOBER 2011 AND MARCH 1997
GROUNDWATER ANALYTICAL RESULTS
FOR DRO
CHS AUBURN SITE
AUBURN, WASHINGTON

FARALLON PN: 301-004

Drawn By: DEW	Checked By: PG	Date: 9/21/12	Disk Reference: 301004d



DEPTH	DRO	GRO	B
25'	<27	<2.9	<0.020

DEPTH	DRO	GRO	B
27'	<27	<3.8	<0.020
30'	<27	<4.2	<0.020

DEPTH	DRO	GRO	B
27'	25.1	<4.50	<0.0270
30'	**2,770**	**1,160**	**<1.18**
35'	<11.2	<10.1	**<0.0604**

DEPTH	DRO	GRO	B
28'	49	<8.1	<0.020
33'	1,100	**600**	**<0.59**
35'	73	**100**	**<0.30**

DEPTH	DRO	GRO	B
28'	390	**250**	**<0.43**
30'	49	19	**<0.060**
33'	<29	<4.6	<0.020

DEPTH	DRO	GRO	B
29'	120	**263**	**0.0569**
30'	602	**409**	**<0.278**
34'	90.5	**35.3**	**<0.0431**

DEPTH	DRO	GRO	B
26'	674	**44.1**	<0.0251
31'	126	**31.5**	**<0.0315**
35'	<11.7	<4.20	<0.0252

DEPTH	DRO	GRO	B
20'	<30	<4.7	<0.020
25.5'	190	<12	<0.025
30'	<28	<14	<0.027

DEPTH	DRO	GRO	B
27'	575	**228**	**<0.223**
29'	46.5	**35.0**	**0.0330**
33'	<11.9	<5.37	**<0.0322**

DEPTH	DRO	GRO	B
26'	<10.6	<4.85	<0.0291
27'	<10.3	<4.81	<0.0289
29'	<11.9	<5.57	**<0.0334**

DEPTH	DRO	GRO	B
25'	53.0	<5.17	**0.0458**
29'	1,070	**295**	**<0.0309**
32'	<12.9	<6.16	**<0.0369**

DEPTH	DRO	GRO	B
16'	1,470	**345**	<0.0273
22'	**2,050**	**2,140**	**<1.67**
27'	916	**1,460**	**<0.251**
29'	<12.2	15.0	<0.0253

DEPTH	DRO	GRO	B
27'	<10.7	<4.50	<0.0270
30'	<10.8	<4.51	<0.0271
32'	<11.0	<3.50	<0.0210

DEPTH	DRO	GRO	B
28'	<10.6	<5.01	<0.0300
31'	272	**77.1**	0.0238
36'	<10.3	<4.98	<0.0299

DEPTH	DRO	GRO	B
25'	970	**570**	<0.40
30'	<28	23	<0.13
38'	<28	<4.0	<0.020

DEPTH	DRO	GRO	B
25'	170	8.7	<0.020
29'	900	**430**	**<1.3**
40'	<26	<3.5	<0.020

DEPTH	DRO	GRO	B
21'	<28	<6.3	<0.020
24'	1,600	<7.7	**0.099**
35'	<35	<8.0	0.023

DEPTH	DRO	GRO	B
17'	<10.7	<4.67	<0.0280
20'	240	**85.0**	**0.0457**
25'	69.5	19.7	<0.0262

DEPTH	DRO	GRO	B
24'	103	20.6	<0.0250
28'	775	14.8	<0.0239
29'	60.6	<4.69	<0.0281

DEPTH	DRO	GRO	B
25'	**2,100**	**477**	**<0.292**
29'	**2,360**	**495**	**<0.281**
32'	<10.6	<4.48	<0.0269

DEPTH	DRO	GRO	B
23'	**2,170**	**138**	<0.0292
29'	696	**251**	**<0.304**
35'	<11.7	<4.64	<0.0279

DEPTH	DRO	GRO	B
25'	<28	<3.9	<0.020
27'	110	<4.9	<0.020
31'	<32	<7.1	<0.020

DEPTH	DRO	GRO	B
24'	957	23.3	**<0.0307**
28'	**2,160**	**354**	**0.0756**
35'	<11.0	<5.11	**<0.0306**

LEGEND

FB-10 ◆ BORING LOCATION

CMW-25 ⊕ CHS MONITORING WELL

HMW-13 ⊕ HILLMAN MONITORING WELL

DEPTH IN FEET BELOW GROUND SURFACE

ALL SOIL ANALYTICAL RESULTS IN MILLIGRAMS PER KILOGRAM

GRO = TOTAL PETROLEUM HYDROCARBONS (TPH) AS GASOLINE-RANGE ORGANICS

DRO = TPH AS DIESEL-RANGE ORGANICS

B = BENZENE

BOLD = INDICATES CONCENTRATIONS EXCEED WASHINGTON STATE MODEL TOXICS CONTROL ACT CLEANUP REGULATION METHOD A CLEANUP LEVELS

< = INDICATES CONCENTRATIONS NOT DETECTED AT OR ABOVE THE STATED LABORATORY PRACTICAL QUANTITATION LIMIT

APPROXIMATE EXTENT OF SITE BOUNDARY WHERE 2007 AND 2008 SOIL DATA OR 2008 AND 2009 GROUNDWATER DATA EXCEED MTCA METHOD A CLEANUP LEVELS

N

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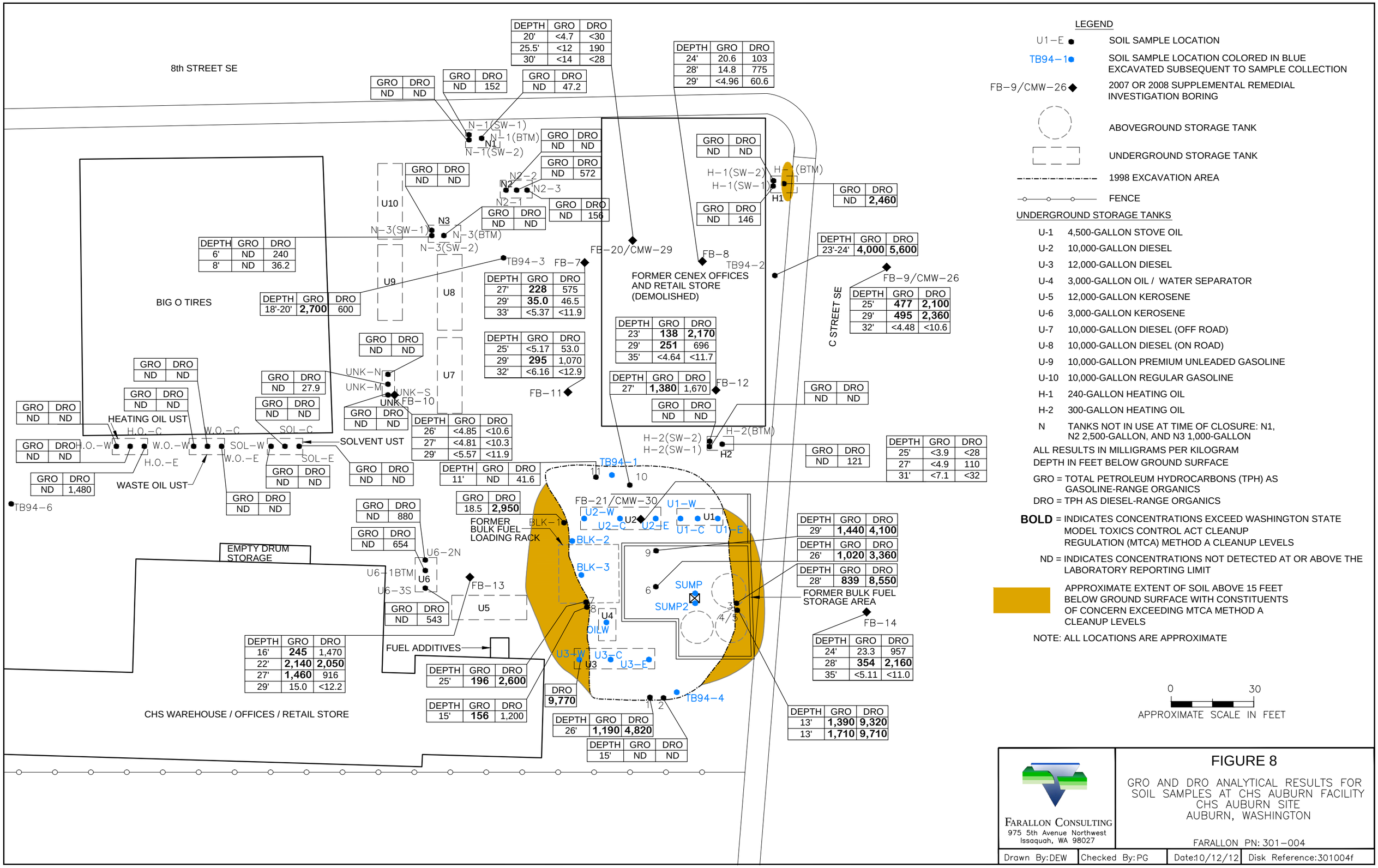
FIGURE 7

SITE PLAN SHOWING DRO, GRO, AND BENZENE RESULTS FOR SOIL– AUGUST 2007 AND FEBRUARY/MARCH 2008
CHS AUBURN SITE
AUBURN, WASHINGTON

FARALLON PN: 301–004

Drawn By: DEW	Checked By: PG	Date: 9/21/12	Disk Reference: 301004b



DEPTH	GRO	DRO
20'	<4.7	<30
25.5'	<12	190
30'	<14	<28

GRO	DRO
ND	ND

GRO	DRO
ND	152

GRO	DRO
ND	47.2

DEPTH	GRO	DRO
24'	20.6	103
28'	14.8	775
29'	<4.96	60.6

GRO	DRO
ND	ND

GRO	DRO
ND	572

GRO	DRO
ND	156

GRO	DRO
ND	ND

GRO	DRO
ND	ND

GRO	DRO
ND	146

GRO	DRO
ND	**2,460**

DEPTH	GRO	DRO
6'	ND	240
8'	ND	36.2

DEPTH	GRO	DRO
18'-20'	**2,700**	600

DEPTH	GRO	DRO
27'	**228**	575
29'	**35.0**	46.5
33'	<5.37	<11.9

DEPTH	GRO	DRO
23'-24'	**4,000**	**5,600**

DEPTH	GRO	DRO
25'	**477**	**2,100**
29'	**495**	**2,360**
32'	<4.48	<10.6

GRO	DRO
ND	ND

DEPTH	GRO	DRO
25'	<5.17	53.0
29'	**295**	1,070
32'	<6.16	<12.9

DEPTH	GRO	DRO
23'	**138**	**2,170**
29'	**251**	696
35'	<4.64	<11.7

GRO	DRO
ND	ND

GRO	DRO
ND	27.9

GRO	DRO
ND	ND

GRO	DRO
ND	ND

GRO	DRO
ND	ND

GRO	DRO
ND	ND

GRO	DRO
ND	ND

GRO	DRO
ND	ND

GRO	DRO
ND	ND

GRO	DRO
ND	1,480

DEPTH	GRO	DRO
26'	<4.85	<10.6
27'	<4.81	<10.3
29'	<5.57	<11.9

DEPTH	GRO	DRO
27'	**1,380**	1,670

GRO	DRO
ND	ND

GRO	DRO
ND	ND

GRO	DRO
ND	121

DEPTH	GRO	DRO
25'	<3.9	<28
27'	<4.9	110
31'	<7.1	<32

DEPTH	GRO	DRO
11'	ND	41.6

GRO	DRO
18.5	**2,950**

GRO	DRO
ND	880

GRO	DRO
ND	654

GRO	DRO
ND	543

DEPTH	GRO	DRO
29'	**1,440**	**4,100**

DEPTH	GRO	DRO
26'	**1,020**	**3,360**

DEPTH	GRO	DRO
28'	**839**	**8,550**

DEPTH	GRO	DRO
16'	**245**	1,470
22'	**2,140**	**2,050**
27'	**1,460**	916
29'	15.0	<12.2

DEPTH	GRO	DRO
25'	**196**	**2,600**

DEPTH	GRO	DRO
15'	**156**	1,200

DEPTH	GRO	DRO
26'	**1,190**	**4,820**

DEPTH	GRO	DRO
15'	ND	ND

DEPTH	GRO	DRO
24'	23.3	957
28'	**354**	**2,160**
35'	<5.11	<11.0

DEPTH	GRO	DRO
13'	**1,390**	**9,320**
13'	**1,710**	**9,710**

LEGEND

- U1-E ● SOIL SAMPLE LOCATION
- TB94-1● SOIL SAMPLE LOCATION COLORED IN BLUE EXCAVATED SUBSEQUENT TO SAMPLE COLLECTION
- FB-9/CMW-26◆ 2007 OR 2008 SUPPLEMENTAL REMEDIAL INVESTIGATION BORING
- ABOVEGROUND STORAGE TANK
- UNDERGROUND STORAGE TANK
- 1998 EXCAVATION AREA
- FENCE

UNDERGROUND STORAGE TANKS

U-1	4,500-GALLON STOVE OIL
U-2	10,000-GALLON DIESEL
U-3	12,000-GALLON DIESEL
U-4	3,000-GALLON OIL / WATER SEPARATOR
U-5	12,000-GALLON KEROSENE
U-6	3,000-GALLON KEROSENE
U-7	10,000-GALLON DIESEL (OFF ROAD)
U-8	10,000-GALLON DIESEL (ON ROAD)
U-9	10,000-GALLON PREMIUM UNLEADED GASOLINE
U-10	10,000-GALLON REGULAR GASOLINE
H-1	240-GALLON HEATING OIL
H-2	300-GALLON HEATING OIL
N	TANKS NOT IN USE AT TIME OF CLOSURE: N1, N2 2,500-GALLON, AND N3 1,000-GALLON

ALL RESULTS IN MILLIGRAMS PER KILOGRAM
DEPTH IN FEET BELOW GROUND SURFACE

GRO = TOTAL PETROLEUM HYDROCARBONS (TPH) AS GASOLINE-RANGE ORGANICS
DRO = TPH AS DIESEL-RANGE ORGANICS

BOLD = INDICATES CONCENTRATIONS EXCEED WASHINGTON STATE MODEL TOXICS CONTROL ACT CLEANUP REGULATION (MTCA) METHOD A CLEANUP LEVELS

ND = INDICATES CONCENTRATIONS NOT DETECTED AT OR ABOVE THE LABORATORY REPORTING LIMIT

APPROXIMATE EXTENT OF SOIL ABOVE 15 FEET BELOW GROUND SURFACE WITH CONSTITUENTS OF CONCERN EXCEEDING MTCA METHOD A CLEANUP LEVELS

NOTE: ALL LOCATIONS ARE APPROXIMATE

0 30
APPROXIMATE SCALE IN FEET

FIGURE 8

GRO AND DRO ANALYTICAL RESULTS FOR SOIL SAMPLES AT CHS AUBURN FACILITY
CHS AUBURN SITE
AUBURN, WASHINGTON

FARALLON PN: 301-004

FARALLON CONSULTING
975 5th Avenue Northwest
Issaquah, WA 98027

Drawn By: DEW | Checked By: PG | Date: 10/12/12 | Disk Reference: 301004f

Figure 9. Disproportionate Cost Analysis Rankings
Groundwater Cleanup Action Alternatives

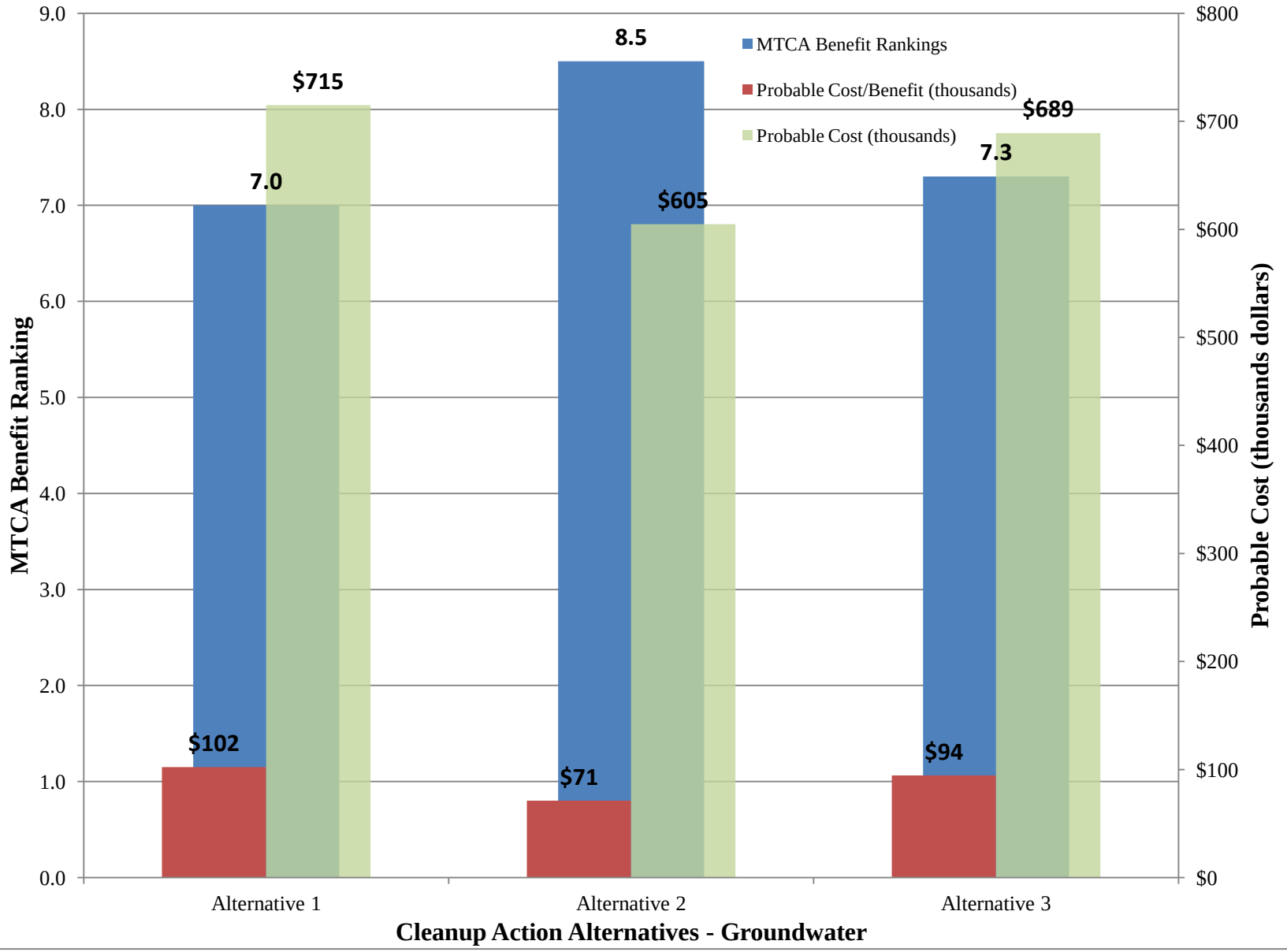
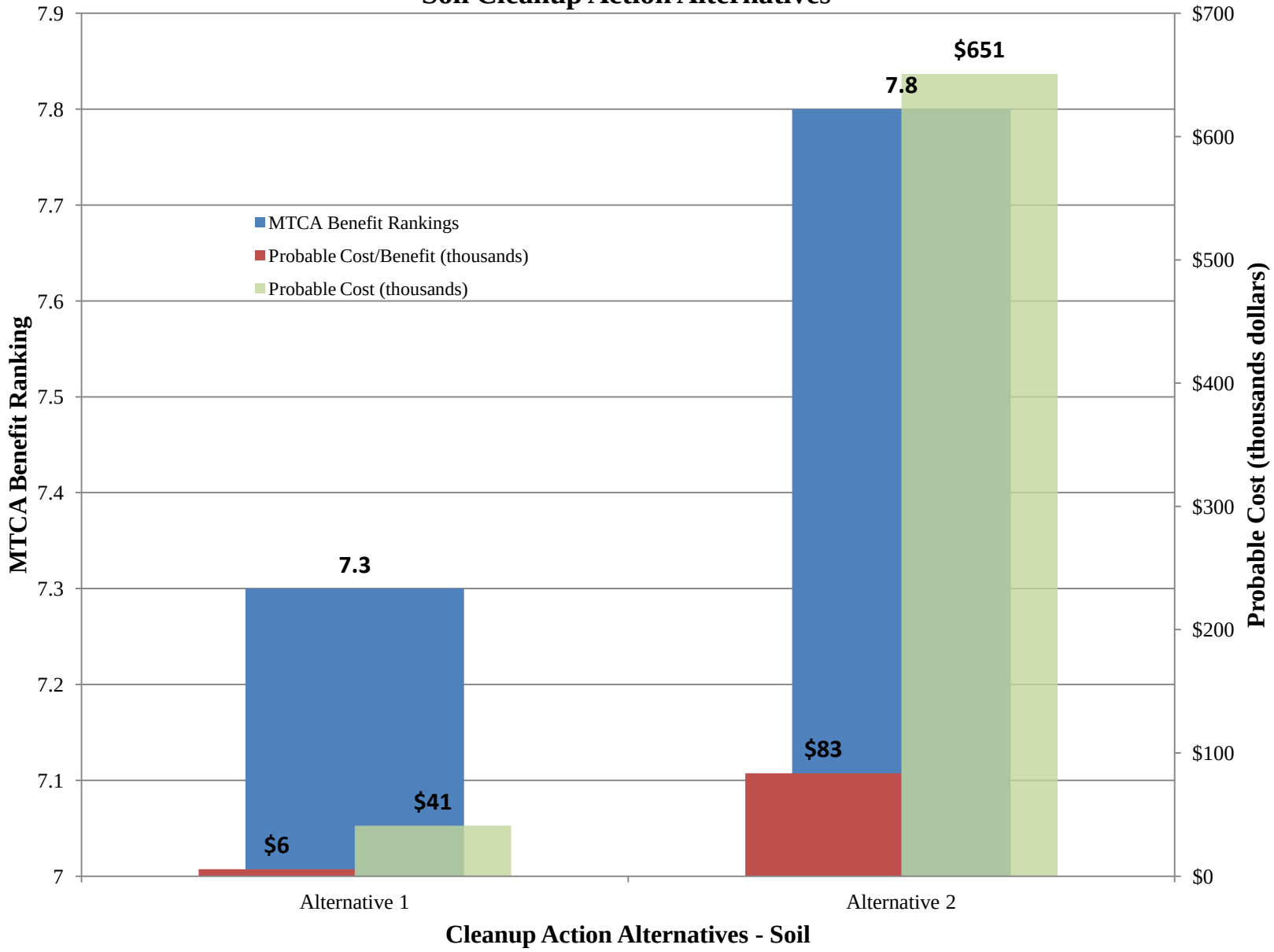
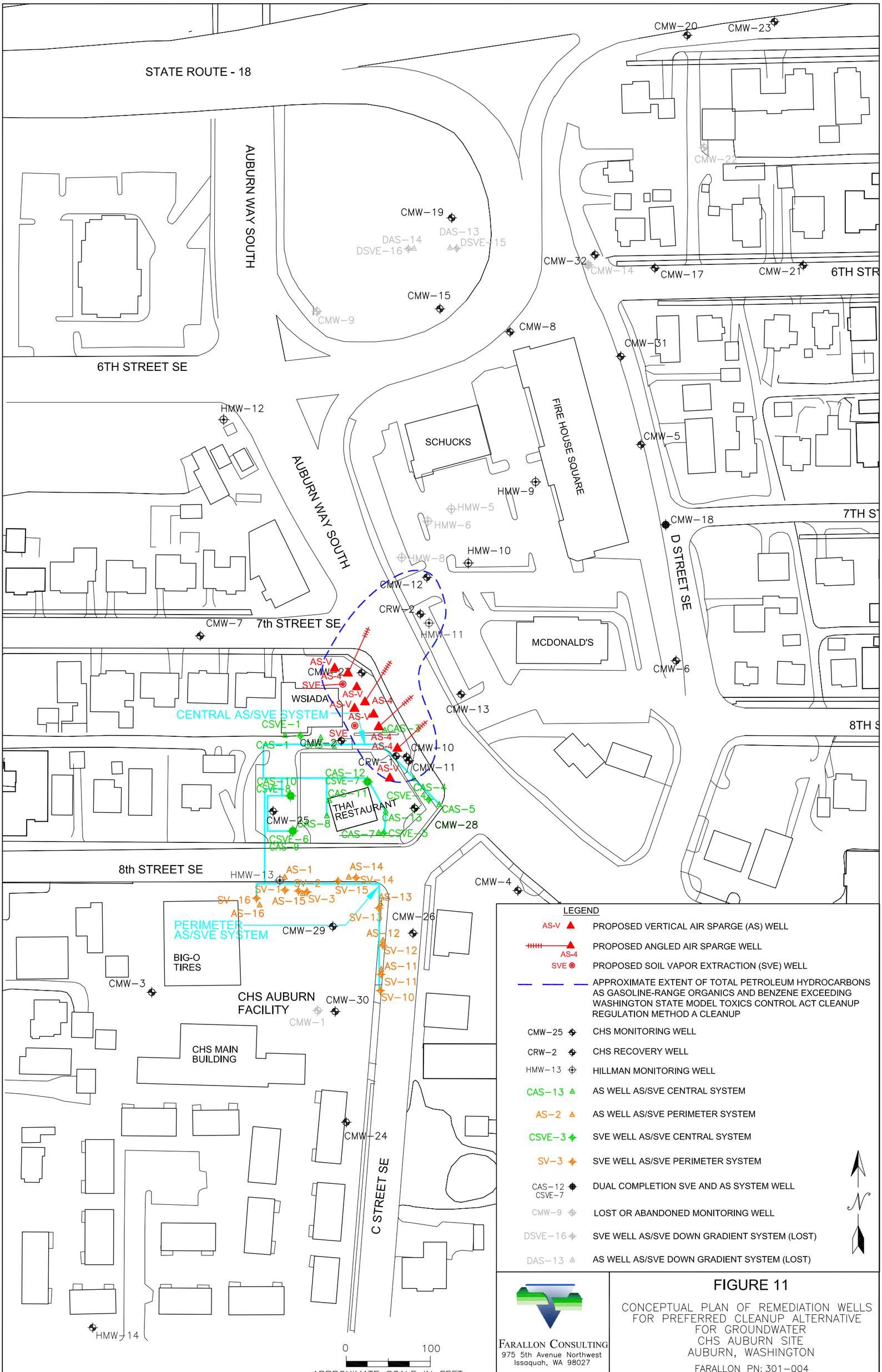


Figure 10. Disproportionate Cost Analysis Rankings
Soil Cleanup Action Alternatives





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Issaquah, WA 98027

FIGURE 11

CONCEPTUAL PLAN OF REMEDIATION WELLS FOR PREFERRED CLEANUP ALTERNATIVE FOR GROUNDWATER
CHS AUBURN SITE
AUBURN, WASHINGTON

FARALLON PN: 301-004

Drawn By: DEW	Checked By: PG	Date: 4/4/14	Disk Reference: 301004k

TABLES

FEASIBILITY STUDY
CHS Auburn Site
Auburn, Washington

Farallon PN: 301-004

Table 1
Summary of Laboratory Analytical Results for TPH and BTEX in Groundwater
CHS Auburn Site
Auburn, Washington
Farallon PN: 301-004

Well Identification	Sampled by	Sample Identification	Sample Date	Analytical Results (milligrams per liter)			Analytical Results (micrograms per liter)			
				DRO[1]	ORO[1]	GRO[2]	Benzene[3]	Toluene[3]	Ethylbenzene[3]	Total Xylenes[3]
CMW-1	Summit	CMW-1	7/22/1994	**5.3**	—	**420**	**24,000**	**41,000**	**5,900**	**30,900**
	Summit	CMW-1	12/2/1994	**2.5**	—	**20**	**980**	**1,600**	410	**1,800**
	Summit	CMW-1	1/9/1995	—	—	**47**	**7,400**	**8,600**	**920**	**5,100**
	Summit	CMW-1	2/14/1995	—	—	**250**	**14,000**	**14,000**	**750**	**3,800**
	Summit	CMW-1	3/13/1995	**9.9**	**2.4**	**130**	**6,500**	**17,000**	**1,500**	**13,000**
	Summit	CMW-1	4/6/1995	—	—	**110**	**28,000**	**16,000**	**1,700**	**12,000**
	Summit	CMW-1	5/3/1995	—	—	**190**	**4,600**	**37,000**	**4,200**	**24,000**
	Summit	CMW-1	6/15/1995	**5.9**	**0.89**	**61**	**10,000**	**13,000**	**1,200**	**6,600**
	Summit	CMW-1	7/12/1995	—	—	**83**	**11,000**	**20,000**	**970**	**9,900**
	Summit	CMW-1	8/7/1995	—	—	**53**	**64**	**4,100**	260	**9,600**
	Summit	CMW-1	9/11/1995	**7.2**	—	**37**	**260**	**2,800**	270	**3,900**
	Summit	CMW-1	10/4/1995	—	—	**23**	**47**	**1,600**	71	**3,600**
	Summit	CMW-1	11/2/1995	—	—	**18**	**<8**	170	45	**2,600**
	Summit	CMW-1	12/18/1995	**2.5**	**<0.75**	**26**	**<20**	280	50	**5,000**
	Summit	CMW-1	1/9/1996	—	—	**33**	**19**	330	130	**5,900**
	Summit	CMW-1	2/15/1996	—	—	**58**	**64**	**1,300**	400	**11,000**
	Summit	CMW-1	3/7/1996	**10**	**0.85**	**87**	**140**	**2,400**	**760**	**18,000**
	Summit	CMW-1	4/10/1996	—	—	**90**	**110**	**2,700**	**730**	**17,000**
	Summit	CMW-1	5/8/1996	—	—	**54.3**	**<100**	**1,730**	550	**13,400**
	Summit	CMW-1	6/6/1996	**1.03**	—	**14.8**	**6.11**	93.8	66.7	**2,350**
	Summit	CMW-1	7/11/1996	—	—	**9.71**	2.78	36.1	37.3	**1,440**
	Summit	CMW-1	8/7/1996	—	—	**40.7**	**319**	**3,770**	**1,630**	**7,330**
	Summit	CMW-1	9/13/1996	**1.03**	—	0.654	**29.8**	15.3	51.0	56.7
	Summit	CMW-1	10/11/1996	—	—	**0.961**	**9.01**	1.94	5.28	**9.96**
	Summit	CMW-1	10/31/1996	—	—	**0.112**	**8.13**	0.735	4.08	**3.92**
	Summit	CMW-1	12/5/1996	**0.984**	—	0.609	**19.3**	1.51	39.3	129
	Summit	CMW-1	3/6/1997	**17.4**	**1.98**	**42**	**31.9**	318	349.0	**6,100**
	Summit	CMW-1	6/24/1997	**7.14**	**1.41**	**69.9**	**74.1**	623	298.0	**9,540**
	Summit	CMW-1	9/4/1997	**0.733**	**<0.75**	**1.41**	**38.6**	0.934	4.2	34
	Summit	CMW-1	12/3/1997	**11.1**	**<0.75**	**22.3**	**<12.5**	27.8	<12.5	**2,930**
	Summit	CMW-1	3/6/1998	**8.27**	**0.836**	**2.31**	**58.4**	33.4	55.8	**1,160**
	Summit	CMW-1	6/18/1998	**3.99**	**0.836**	**4.29**	**<25.0**	<10.0	<15.0	<25.0
MTCA Method A Cleanup Levels for Groundwater[4]				**0.5**	**0.5**	**0.8/1.0**	**5**	**1,000**	**700**	**1,000**

Table 1
Summary of Laboratory Analytical Results for TPH and BTEX in Groundwater
CHS Auburn Site
Auburn, Washington
Farallon PN: 301-004

Well Identification	Sampled by	Sample Identification	Sample Date	Analytical Results (milligrams per liter)			Analytical Results (micrograms per liter)			
				DRO[1]	ORO[1]	GRO[2]	Benzene[3]	Toluene[3]	Ethylbenzene[3]	Total Xylenes[3]
CMW-2	Summit	CMW-2	7/22/1994	**9.3**	—	**180**	**24,000**	**24,000**	**3,000**	**13,600**
	Summit	CMW-2	2/14/1995	—	—	**91**	**9,900**	**13,000**	**2,600**	**17,000**
	Summit	CMW-2	3/13/1995	**36**	**2.0**	**88**	**12,000**	**11,000**	**1,500**	**7,800**
	Summit	CMW-2	4/6/1995	—	—	**77**	**15,000**	**14,000**	**1,900**	**9,200**
	Summit	CMW-2	5/3/1995	—	—	**120**	**15,000**	**16,000**	**2,700**	**13,000**
	Summit	CMW-2	1/9/1996	—	—	**110**	**4,200**	**4,400**	**1,700**	**8,500**
	Summit	CMW-2	2/15/1996	—	—	**19**	**1,700**	**2,000**	**740**	**2,600**
	Summit	CMW-2	3/7/1996	**8.3**	**0.9**	**12**	**1,000**	510	**410**	**1,800**
	Summit	CMW-2	4/10/1996	—	—	**23**	**1,600**	**1,500**	**780**	**3,100**
	Summit	CMW-2	5/7/1996	—	—	**25.6**	**2,840**	**3,360**	**1,060**	**4,480**
	Summit	CMW-2	6/6/1996	**43.5**	—	**43.9**	**4,700**	**7,200**	**1,330**	**5,490**
	Summit	CMW-2	7/11/1996	—	—	**42.6**	**1,750**	**3,680**	520	**8,250**
	Summit	CMW-2	8/7/1996	—	—	**33.7**	**52.8**	**915**	411	**3,720**
	Summit	CMW-2	9/13/1996	**85.7**	—	**12.0**	**56.7**	171	79.7	**1,350**
	Summit	CMW-2	10/11/1996	—	—	**6.8**	**57.8**	93.9	36.8	394
	Summit	CMW-2	10/31/1996	—	—	**2.28**	**258**	645	**940**	**8,860**
	Summit	CMW-2	12/5/1996	**26.6**	—	**5.52**	**544**	**1,270**	60.4	588
	Summit	CMW-2	1/8/1997	—	—	<0.05	2.1	0.79	<0.5	2.18
	Summit	CMW-2	2/4/1997	—	—	0.412	1.62	28.9	6.9	64.1
	Summit	CMW-2	3/6/1997	**15.3**	**2.0**	<0.1	<0.5	<0.5	<0.5	<1
MTCA Method A Cleanup Levels for Groundwater[4]				**0.5**	**0.5**	**0.8/1.0**	**5**	**1,000**	**700**	**1,000**

Table 1
Summary of Laboratory Analytical Results for TPH and BTEX in Groundwater
CHS Auburn Site
Auburn, Washington
Farallon PN: 301-004

Well Identification	Sampled by	Sample Identification	Sample Date	Analytical Results (milligrams per liter)			Analytical Results (micrograms per liter)			
				DRO[1]	ORO[1]	GRO[2]	Benzene[3]	Toluene[3]	Ethylbenzene[3]	Total Xylenes[3]
CMW-2	Summit	CMW-2	4/7/1997	—	—	<0.1	<0.5	<0.5	<0.5	<1
	Summit	CMW-2	5/8/1997	—	—	**<50**	<0.5	<0.5	<0.5	<1
	Summit	CMW-2	6/24/1997	**6.62**	**1.23**	0.437	**437**	189	7.59	77.5
	Summit	CMW-2	7/7/1997	—	—	**1.83**	**333**	88.3	14.3	150
	Summit	CMW-2	8/5/1997	—	—	**77.4**	1.66	1.36	1.09	6.26
	Summit	CMW-2	9/3/1997	**6.36**	**0.91**	0.354	0.92	8.52	4.45	33.9
	Summit	CMW-2	10/16/1997	—	—	0.188	0.815	8.52	2.54	16.4
	Summit	CMW-2	11/14/1997	—	—	0.089	<0.5	1.91	0.969	7.73
	Summit	CMW-2	12/3/1997	**5.06**	**<0.75**	**3.97**	**<10**	237	**36.4**	876
	Summit	CMW-2	1/29/1998	—	—	**1.38**	**226**	59.4	28.1	287
	Summit	CMW-2	3/6/1998	**3.12**	**<0.75**	0.654	**80**	17.2	9.26	96.8
	Summit	CMW-2	6/18/1998	<0.25	**<0.75**	<0.05	<0.5	<1	<1	<1
	Summit	CMW-2	9/23/1998	0.419	**<0.75**	<0.05	<0.5	<1	<1	<1
	Summit	CMW-2	12/4/1998	**95.2**	—	**168**	**188**	335	660	**7,070**
	Summit	CMW-2	3/25/1999	**5.47**	—	0.186	**29.5**	5.06	3.07	16.7
	Summit	CMW-2	6/15/1999	**6.31**	—	**15.4**	**481**	38.3	**761**	**2,630**
	ERM	CMW-2	12/31/1999	<0.25	—	<0.050	<0.5	<0.5	<0.5	<1
	ERM	CMW-2	4/17/2000	**3.96**	—	**2.58**	**63.4**	12.8	74.9	465
	ERM	CMW-2	6/13/2000	**5.32**	—	0.189	**9.19**	ND	3.34	12.4
	ERM	CMW-2	10/5/2000	ND	—	ND	ND	ND	1.25	3.05
	ERM	CMW-2	12/26/2000	ND	—	ND	ND	ND	ND	ND
	ERM	CMW-2	3/30/2001	ND	—	ND	ND	ND	ND	ND
	ERM	CMW-2	6/29/2001	<0.25	—	<0.050	<0.5	<0.5	<0.5	<1
	ERM	CMW-2	9/28/2001	No sample collected - well dry						
	ERM	CMW-2	12/17/2001	**14.0**	ND	**11.60**	**30.0**	ND	149	959
	ERM	CMW-2	3/8/2002	**11.5**	—	0.296	2.2	ND	2.46	4.79
MTCA Method A Cleanup Levels for Groundwater[4]				**0.5**	**0.5**	**0.8/1.0**	**5**	**1,000**	**700**	**1,000**

Table 1
Summary of Laboratory Analytical Results for TPH and BTEX in Groundwater
CHS Auburn Site
Auburn, Washington
Farallon PN: 301-004

Well Identification	Sampled by	Sample Identification	Sample Date	Analytical Results (milligrams per liter)			Analytical Results (micrograms per liter)			
				DRO[1]	ORO[1]	GRO[2]	Benzene[3]	Toluene[3]	Ethylbenzene[3]	Total Xylenes[3]
CMW-2	ERM	CMW-2	7/30/2002	**17.5**	—	**1.44**	**33.3**	1.67	30.6	78.5
	ERM	CMW-2	12/12/2002	No sample collected - well dry						
	ERM	CMW-2	3/20/2003	**13.3**	—	**2.27**	**44.8**	1.87	38.0	68.2
	ERM	CMW-2	6/25/2003	**8.47**	—	**1.12**	**33.3**	0.788	22.6	24.8
	Farallon	CMW-2	9/30/2003	No sample collected-well dry						
	Farallon	CMW-121803-03	12/18/2003	**7.97**	—	**3.32**	**17**	< 2.5	23.8	85
	Farallon	CMW2-032504	3/25/2004	**20.3**	—	**0.932**	0.595	<0.5	1.35	9.18
	Farallon	CMW2-062804-01	6/28/2004	**11.6**	—	**1.25**	**5.57**	0.827	16.1	78.3
	Farallon	CMW2-092104	9/21/2004	**17.9**	**1.07**	0.186	<0.5	<0.5	1.48	3.3
	Farallon	CMW2-122104	12/21/2004	**14.6**	**0.869**	0.261	1.33	<0.5	2.68	6.59
	Farallon	CMW2-033105	3/31/2005	**7.86**	**<2**	0.53	1.81	<0.5	3.35	8.58
	Farallon	CMW-2-070805	7/8/2005	**6.51**	**<1.0**	0.717	1.24	<0.5	4.44	8.34
	Farallon	CMW-2-093005	9/30/2005	**6.89**	**<1.0**	**1.36**	1.73	0.538	7.07	9.56
	Farallon	CMW-2-122805	12/8/2005	**3.10**	**<1.0**	0.554	<0.5	<0.5	2.02	1.7
	Farallon	CMW-2-032806	3/28/2006	**13.1**	**<4.81**	<0.050	<0.500	<0.500	<0.500	<1.00
	Farallon	CMW-2-102006	10/20/2006	**3.87**	<0.250	0.0572 JH	<0.500	<0.500	<0.500	<1.00
	Farallon	CMW2-031308	3/13/2008	<0.26	**0.60**	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW2-061708	6/17/2008	<0.25	<0.40	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW2-100108	10/1/2008	0.44	**0.85**	<0.400	<4.0	<4.0	<4.0	<8.0
	Farallon	CMW2-123008	12/30/2008	<0.29	<0.46	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW2-031909	3/19/2009	0.35	<0.43	<0.100	<1.0	<1.0	<1.0	1.6
	Farallon	CMW2-102809	10/28/2009	<0.25	<0.40	0.240	2.0	1.2	<1.0	2.0
	Farallon	CMW2-012610	1/26/2010	<0.26	<0.42	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW2-042010	4/20/2010	0.28	<0.42	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW2-072010	7/20/2010	**0.92**	**<0.67**[10]	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-2-102110	10/21/2010	**0.63**	<0.44	<0.100	<1.0	<1.0	1.1	1.5
MTCA Method A Cleanup Levels for Groundwater[4]				**0.5**	**0.5**	**0.8/1.0**	**5**	**1,000**	**700**	**1,000**

Table 1
Summary of Laboratory Analytical Results for TPH and BTEX in Groundwater
CHS Auburn Site
Auburn, Washington
Farallon PN: 301-004

Well Identification	Sampled by	Sample Identification	Sample Date	Analytical Results (milligrams per liter)			Analytical Results (micrograms per liter)			
				DRO[1]	ORO[1]	GRO[2]	Benzene[3]	Toluene[3]	Ethylbenzene[3]	Total Xylenes[3]
CMW-2	Farallon	CMW-2-012511	1/25/2011	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW2-042711	4/27/2011	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-2-071811	7/18/2011	<0.27	<0.44	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-2-102111	10/21/2011	<0.26	<0.42	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-2-042712	4/27/2012	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-2-110112	11/1/2012	0.44	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-2-042313	4/23/2013	<0.26	<0.42	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-2-102313	10/23/2013	<0.26	<0.42	<0.100	<1.0	<1.0	<1.0	<2.0
CMW-3	Summit	CMW-3	7/22/1994	<0.25	—	<0.25	<1	<1	<1	<1
	Summit	CMW-3	9/20/1994	—	—	—	<1	<1	<1	<1
	Summit	CMW-3	12/2/1994	<0.25	—	<0.05	<0.5	<0.5	<0.5	<1
	Summit	CMW-3	1/4/1995	—	—	<0.05	<0.5	<0.5	<0.5	<1
	Summit	CMW-3	2/10/1995	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-3	3/7/1995	<0.25	<0.75	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-3	6/13/1995	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-3	9/7/1995	<0.25	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-3	12/5/1995	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-3	3/5/1996	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-3	6/4/1996	<0.25	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-3	9/11/1996	<0.25	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-3	12/5/1996	<0.25	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-3	3/4/1997	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-3	3/4/1998	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-3	3/22/1999	0.295	—	<0.050	<0.5	<0.5	<0.5	<1
	ERM	CMW-3	3/30/2001	ND	—	ND	ND	ND	ND	ND
	ERM	CMW-3	3/8/2002	ND	—	ND	ND	ND	ND	ND
	ERM	CMW-3	4/17/2000	0.475	—	ND	ND	ND	ND	ND
	ERM	CMW-3	12/12/2002	No sample collected - well dry						
	ERM	CMW-3	3/19/2003	<0.25	—	<0.050	<0.5	<0.5	<0.5	<1
MTCA Method A Cleanup Levels for Groundwater[4]				**0.5**	**0.5**	**0.8/1.0**	**5**	**1,000**	**700**	**1,000**

Table 1
Summary of Laboratory Analytical Results for TPH and BTEX in Groundwater
CHS Auburn Site
Auburn, Washington
Farallon PN: 301-004

Well Identification	Sampled by	Sample Identification	Sample Date	Analytical Results (milligrams per liter)			Analytical Results (micrograms per liter)			
				DRO[1]	ORO[1]	GRO[2]	Benzene[3]	Toluene[3]	Ethylbenzene[3]	Total Xylenes[3]
CMW-3	Farallon	CMW3-032504	3/25/2004	<0.25	—	<0.05	<0.5	<0.5	<0.5	<1
	Farallon	CMW3-062804-01	6/28/2004	<0.25	—	<0.05	<0.5	<0.5	<0.5	<1
	Farallon	CMW3-033105	3/31/2005	<0.25	<0.5	<0.05	<0.5	<0.5	<0.5	<1
	Farallon	CMW-3-032806	3/28/2006	<0.245	<0.490	<0.050	<0.500	<0.500	<0.500	<1.00
	Farallon	CMW3-031208	3/12/2008	<0.27	<0.43	<0.100	<1.0	<1.0	<1.0	<2.0
CMW-4	Summit	CMW-4	10/5/1994	<0.25	—	<0.05	<0.5	<0.5	<0.5	<1
	Summit	CMW-4	11/10/1994	—	—	<0.05	**5.6**	<0.5	<0.5	<1
	Summit	CMW-4	12/5/1994	0.42	—	<0.05	1	<0.5	<0.5	<1
	Summit	CMW-4	1/5/1995	—	—	<0.05	0.83	<0.5	<0.5	<1
	Summit	CMW-4	2/13/1995	—	—	<0.08	<0.5	<0.5	<0.5	<1
	Summit	CMW-4	3/7/1995	0.29	**<0.75**	<0.05	0.65	<0.5	<0.5	<1
	Summit	CMW-4	4/5/1995	—	—	0.073	**580**	<0.5	<0.5	2.7
	Summit	CMW-4	5/3/1995	—	—	0.068	**990**	<0.5	<0.5	1.3
	Summit	CMW-4	6/14/1995	0.40	**<0.75**	<0.050	**770**	<0.5	<0.5	1
	Summit	CMW-4	7/11/1995	—	—	<0.050	**270**	<0.5	<0.5	<1
	Summit	CMW-4	8/7/1995	—	—	0.051	**460**	1.2	<0.5	<1
	Summit	CMW-4	9/11/1995	**1.8**	—	**1.3**	**1,400**	2.6	20	190
	Summit	CMW-4	10/4/1995	—	—	0.440	**360**	<0.5	1.7	20
	Summit	CMW-4	11/2/1995	—	—	0.075	**17**	<0.5	<0.5	1.1
	Summit	CMW-4	12/18/1995	**0.51**	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-4	1/9/1996	—	—	<0.050	0.6	<0.5	<0.5	<1
	Summit	CMW-4	2/13/1996	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-4	3/4/1996	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-4	4/10/1996	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-4	5/8/1996	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-4	6/5/1996	0.268	—	<0.050	<0.5	<0.5	<0.5	<1
MTCA Method A Cleanup Levels for Groundwater[4]				**0.5**	**0.5**	**0.8/1.0**	**5**	**1,000**	**700**	**1,000**

Table 1
Summary of Laboratory Analytical Results for TPH and BTEX in Groundwater
CHS Auburn Site
Auburn, Washington
Farallon PN: 301-004

Well Identification	Sampled by	Sample Identification	Sample Date	Analytical Results (milligrams per liter)			Analytical Results (micrograms per liter)			
				DRO[1]	ORO[1]	GRO[2]	Benzene[3]	Toluene[3]	Ethylbenzene[3]	Total Xylenes[3]
CMW-4	Summit	CMW-4	7/9/1996	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-4	8/7/1996	—	—	0.075	2.58	<0.5	<0.5	<1
	Summit	CMW-4	9/13/1996	**0.511**	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-4	12/4/1996	<0.25	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-4	3/4/1997	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-4	3/4/1998	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-4	12/4/1998	<0.25	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-4	3/22/1999	0.306	—	<0.050	<0.5	<0.5	<0.5	<1
	ERM	CMW-4	4/17/2000	ND	—	ND	ND	ND	ND	ND
	ERM	CMW-4	3/30/2001	ND	—	ND	ND	ND	ND	ND
	ERM	CMW-4	3/8/2002	ND	—	ND	ND	ND	ND	ND
	ERM	CMW-4	12/12/2002	ND	—	—	—	—	—	—
	ERM	CMW-4	3/19/2003	<0.25	—	<0.050	<0.5	<0.5	<0.5	<1
	Farallon	CMW4-032504	3/25/2004	<0.25	—	<0.05	<0.5	<0.5	<0.5	<1
	Farallon	CMW4-033105	3/31/2005	<0.25	<0.5	<0.05	<0.5	<0.5	<0.5	<1
	Farallon	CMW-4-032806	3/28/2006	**0.862**	<0.476	<0.050	<0.500	<0.500	<0.500	<1.00
	Farallon	CMW-4-101906	10/19/2006	<0.250	<0.500	<0.050	<0.500	<0.500	<0.500	<1.00
	Farallon	CMW4-031308	3/13/2008	<0.27	<0.42	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW4-061608	6/16/2008	<0.25	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW4-100108	10/1/2008	<0.25	<0.40	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW4-123008	12/30/2008	<0.28	<0.44	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW4-031909	3/19/2009	<0.25	<0.40	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW4-102809	10/28/2009	<0.25	<0.40	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW4-012610	1/26/2010	<0.25	<0.40	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW4-042010	4/20/2010	<0.27	<0.43	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-4-072010	7/20/2010	<0.31	<0.49	<0.100	<1.0	<1.0	<1.0	<2.0
MTCA Method A Cleanup Levels for Groundwater[4]				**0.5**	**0.5**	**0.8/1.0**	**5**	**1,000**	**700**	**1,000**

Table 1
Summary of Laboratory Analytical Results for TPH and BTEX in Groundwater
CHS Auburn Site
Auburn, Washington
Farallon PN: 301-004

Well Identification	Sampled by	Sample Identification	Sample Date	Analytical Results (milligrams per liter)			Analytical Results (micrograms per liter)			
				DRO[1]	ORO[1]	GRO[2]	Benzene[3]	Toluene[3]	Ethylbenzene[3]	Total Xylenes[3]
CMW-4	Farallon	CMW-4-102110	10/21/2010	<0.28	<0.45	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-4-012511	1/25/2011	<0.26	<0.42	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW4-042611	4/26/2011	<0.28	<0.45	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-4-071911	7/19/2011	<0.28	<0.44	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-4-102011	10/20/2011	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
CMW-5	Summit	CMW-5	10/5/1994	0.48	—	**0.18**	**3,600**	0.52	8.6	<1
	Summit	CMW-5	11/9/1994	—	—	**0.15**	**3,100**	<0.5	4.2	<1
	Summit	CMW-5	12/7/1994	**0.53**	—	0.09	**2,000**	<0.5	1.5	<1
	Summit	CMW-5	1/11/1995	—	—	<0.05	**720**	<0.5	<0.5	<1
	Summit	CMW-5	2/14/1995	—	—	<0.08	**39**	<0.5	<0.5	<1
	Summit	CMW-5	3/10/1995	0.30	**0.89**	<0.05	1.8	<0.5	<0.5	<1
	Summit	CMW-5	4/5/1995	—	—	<0.050	<0.5	<0.5	<0.5	1
	Summit	CMW-5	5/2/1995	—	—	<0.050	1.1	<0.5	<0.5	1
	Summit	CMW-5	6/13/1995	0.37	**1.0**	0.200	**700**	23	1.9	26
	Summit	CMW-5	7/12/1995	—	—	**2.4**	**2,900**	480	110	330
	Summit	CMW-5	8/7/1995	—	—	**7.6**	**5,300**	**1,100**	370	**1,200**
	Summit	CMW-5	8/25/1995	—	—	**9.0**	**5,500**	640	450	**1,400**
	Summit	CMW-5	9/8/1995	**0.86**	—	**6.5**	**4,700**	250	370	**1,200**
	Summit	CMW-5	10/3/1995	—	—	**1.4**	**1,400**	0.84	69	170
	Summit	CMW-5	11/2/1995	—	—	**0.800**	**820**	0.81	68	110
	Summit	CMW-5	12/5/1995	0.41	**<0.8**	**0.800**	**810**	<2.0	97	64
	Summit	CMW-5	1/9/1996	—	—	<0.050	**37**	<2.0	8.3	<1
	Summit	CMW-5	2/13/1996	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-5	3/4/1996	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-5	4/10/1996	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-5	5/7/1996	—	—	<0.050	**7.56**	<0.5	<0.5	<1
MTCA Method A Cleanup Levels for Groundwater[4]				**0.5**	**0.5**	**0.8/1.0**	**5**	**1,000**	**700**	**1,000**

Table 1
Summary of Laboratory Analytical Results for TPH and BTEX in Groundwater
CHS Auburn Site
Auburn, Washington
Farallon PN: 301-004

Well Identification	Sampled by	Sample Identification	Sample Date	Analytical Results (milligrams per liter)			Analytical Results (micrograms per liter)			
				DRO[1]	ORO[1]	GRO[2]	Benzene[3]	Toluene[3]	Ethylbenzene[3]	Total Xylenes[3]
CMW-5	Summit	CMW-5	6/3/1996	0.327	—	<0.050	**0.803**	<0.5	<0.5	<1
	Summit	CMW-5	7/9/1996	—	—	<0.050	**0.695**	<0.5	<0.5	<1
	Summit	CMW-5	8/6/1996	—	—	0.093	**76.7**	<0.5	0.811	<1
	Summit	CMW-5	9/11/1996	**0.619**	—	0.288	**310**	0.544	4.20	3.57
	Summit	CMW-5	10/10/1996	—	—	0.433	**327**	<0.5	3.05	2.07
	Summit	CMW-5	10/30/1996	—	—	0.110	**95.2**	<0.5	<0.5	<1
	Summit	CMW-5	12/2/1996	0.493	—	0.089	**34.9**	<0.5	<0.5	<1
	Summit	CMW-5	3/4/1997	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-5	6/23/1997	0.3	**<0.75**	<0.050	<0.5	<0.5	<0.5	1.12
	Summit	CMW-5	9/3/1997	**0.824**	**<0.75**	0.0785	**64.4**	<0.5	<0.5	2.4
	Summit	CMW-5	12/2/1997	**1.110**	**<0.75**	<0.05	<0.5	<0.5	<0.5	<1
	Summit	CMW-5	3/4/1998	<0.25	**<0.75**	<0.05	<0.5	<0.5	<0.5	<1
	Summit	CMW-5	3/24/1999	0.362	—	<0.05	<0.5	<0.5	<0.5	<1
	ERM	CMW-5	4/17/2000	**0.551**	—	0.557	ND	ND	ND	ND
	ERM	CMW-5	5/1/2001	ND	—	ND	ND	ND	ND	ND
	ERM	CMW-5	3/6/2002	0.283	—	ND	ND	ND	ND	ND
	ERM	CMW-5	3/19/2003	0.323	—	<0.050	<0.5	<0.5	<0.5	<1
	Farallon	CMW-5-101806	10/18/2006	0.468	<0.500	<0.050	<0.500	<0.500	<0.500	<1.00
	Farallon	CMW5-031308	3/13/2008	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW5-061608	6/16/2008	<0.28	<0.45	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW5-100208	10/2/2008	<0.25	<0.40	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW5-123108	12/31/2008	<0.28	<0.44	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW5-032009	3/20/2009	<0.29	<0.46	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW5-102909	10/29/2009	<0.25	<0.40	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW5-012710	1/27/2010	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW5-042010	4/20/2010	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-5-072010	7/20/2010	<0.27	<0.43	<0.100	<1.0	<1.0	<1.0	<2.0
MTCA Method A Cleanup Levels for Groundwater[4]				**0.5**	**0.5**	**0.8/1.0**	**5**	**1,000**	**700**	**1,000**

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CHS Auburn Site
Auburn, Washington
Farallon PN: 301-004

Well Identification	Sampled by	Sample Identification	Sample Date	Analytical Results (milligrams per liter)			Analytical Results (micrograms per liter)			
				DRO[1]	ORO[1]	GRO[2]	Benzene[3]	Toluene[3]	Ethylbenzene[3]	Total Xylenes[3]
CMW-6	Summit	CMW-6	10/5/1994	<0.25	—	<0.05	<0.5	<0.5	<0.5	<1
	Summit	CMW-6	11/9/1994	—	—	<0.05	<0.5	<0.5	<0.5	<1
	Summit	CMW-6	12/7/1994	<0.25	—	<0.05	0.66	<0.5	<0.5	<1
	Summit	CMW-6	1/5/1995	—	—	<0.05	<0.5	<0.5	<0.5	<1
	Summit	CMW-6	2/14/1995	—	—	<0.08	<0.5	<0.5	<0.5	<1
	Summit	CMW-6	3/10/1995	<0.25	**<0.75**	<0.05	<0.5	<0.5	<0.5	<1
	Summit	CMW-6	6/14/1995	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-6	9/7/1995	<0.25	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-6	12/15/1995	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-6	3/4/1996	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-6	6/5/1996	<0.25	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-6	9/11/1996	<0.25	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-6	12/3/1996	0.317	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-6	3/4/1997	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-6	6/23/1997	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-6	9/3/1997	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-6	12/2/1997	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-6	3/4/1998	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-6	9/23/1998	<0.25	**<0.75**	<0.05	<0.5	<0.5	<0.5	<1
	Summit	CMW-6	3/24/1999	<0.25	—	<0.05	<0.5	<0.5	<0.5	<1
	ERM	CMW-6	12/31/1999	<0.25	—	<0.05	<0.5	<0.5	<0.5	<1
	ERM	CMW-6	4/17/2000	ND	—	ND	ND	ND	ND	ND
	ERM	CMW-6	3/6/2002	ND	—	ND	ND	ND	ND	ND
	ERM	CMW-6	3/17/2003	ND	—	ND	ND	ND	ND	ND
	Farallon	CMW6-032304	3/23/2004	<0.25	—	<0.05	<0.5	<0.5	<0.5	<1
	Farallon	CMW6-033005	3/30/2005	<0.25	<0.5	<0.05	<0.5	<0.5	<0.5	<1
	Farallon	CMW-6-032706	3/27/2006	<0.238	<0.476	<0.050	<0.500	<0.500	<0.500	<1.00
MTCA Method A Cleanup Levels for Groundwater[4]				**0.5**	**0.5**	**0.8/1.0**	**5**	**1,000**	**700**	**1,000**

Table 1
Summary of Laboratory Analytical Results for TPH and BTEX in Groundwater
CHS Auburn Site
Auburn, Washington
Farallon PN: 301-004

Well Identification	Sampled by	Sample Identification	Sample Date	Analytical Results (milligrams per liter)			Analytical Results (micrograms per liter)			
				DRO[1]	ORO[1]	GRO[2]	Benzene[3]	Toluene[3]	Ethylbenzene[3]	Total Xylenes[3]
CMW-7	Summit	CMW-7	10/5/1994	0.31	—	<0.05	<0.5	<0.5	<0.5	<1
	Summit	CMW-7	11/10/1994	—	—	<0.05	<0.5	<0.5	<0.5	<1
	Summit	CMW-7	12/5/1994	0.4	—	<0.05	<0.5	<0.5	<0.5	<1
	Summit	CMW-7	1/10/1995	—	—	<0.05	<0.5	<0.5	<0.5	<1
	Summit	CMW-7	2/14/1995	—	—	<0.08	<0.5	<0.5	<0.5	<1
	Summit	CMW-7	3/9/1995	**0.50**	**<0.75**	<0.05	<0.5	<0.5	<0.5	<1
	Summit	CMW-7	6/14/1995	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-7	9/7/1995	**0.55**	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-7	12/15/1995	0.37	**0.81**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-7	3/6/1996	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-7	6/4/1996	0.402	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-7	9/9/1996	<0.25	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-7	12/3/1996	<0.25	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-7	3/4/1997	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-7	3/4/1998	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-7	3/23/1999	<0.25	—	<0.05	<0.5	<0.5	<0.5	<1
	ERM	CMW-7	4/17/2000	ND	—	ND	ND	ND	ND	ND
	ERM	CMW-7	3/30/2001	ND	—	ND	ND	ND	ND	ND
	ERM	CMW-7	3/7/2002	ND	—	ND	ND	ND	ND	ND
	ERM	CMW-7	3/17/2003	ND	—	ND	ND	ND	ND	ND
	Farallon	CMW7-032504	3/25/2004	<0.25	—	<0.05	<0.5	<0.5	<0.5	<1
	Farallon	CMW7-033005	3/30/2005	<0.284	**<0.568**	<0.05	<0.5	<0.5	<0.5	<1
	Farallon	CMW-7-032706	3/27/2006	<0.236	<0.472	<0.050	<0.500	<0.500	<0.500	<1.00
	Farallon	CMW-7-101906	10/19/2006	<0.250	<0.500	<0.050	<0.500	<0.500	<0.500	<1.00
	Farallon	CMW7-031308	3/13/2008	<0.26	<0.42	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW7-061708	6/17/2008	<0.27	<0.43	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW7-100108	10/1/2008	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW7-123008	12/30/2008	<0.26	<0.42	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW7-031909	3/19/2009	<0.28	<0.45	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-7-042712	4/27/2012	<0.26	<0.42	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-7-102112	10/31/2012	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-7-042213	4/22/2013	<0.25	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-7-102213	10/22/2013	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
MTCA Method A Cleanup Levels for Groundwater[4]				**0.5**	**0.5**	**0.8/1.0**	**5**	**1,000**	**700**	**1,000**

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CHS Auburn Site
Auburn, Washington
Farallon PN: 301-004

Well Identification	Sampled by	Sample Identification	Sample Date	Analytical Results (milligrams per liter)			Analytical Results (micrograms per liter)			
				DRO[1]	ORO[1]	GRO[2]	Benzene[3]	Toluene[3]	Ethylbenzene[3]	Total Xylenes[3]
CMW-8	Summit	CMW-8	10/25/1994	—	—	<0.05	**170**	<0.5	<0.5	<1
	Summit	CMW-8	11/9/1994	—	—	<0.05	**32**	<0.5	<0.5	<1
	Summit	CMW-8	12/12/1994	<0.25	—	<0.05	**22**	<0.5	<0.5	<1
	Summit	CMW-8	1/10/1995	—	—	<0.05	**85**	<0.5	<0.5	<1
	Summit	CMW-8	2/14/1995	—	—	<0.08	**460**	<0.5	2.4	<1
	Summit	CMW-8	3/9/1995	<0.25	**<0.75**	0.06	**820**	1.4	4.0	2.0
	Summit	CMW-8	6/15/1995	<0.25	**<0.75**	<0.500	**3,100**	2.0	48	27
	Summit	CMW-8	9/7/1995	0.35	—	0.700	**1,600**	<8	68	24
	Summit	CMW-8	12/18/1995	**0.53**	**<0.75**	0.530	**1,000**	0.52	32	<1
	Summit	CMW-8	3/6/1996	**1**	**<0.75**	**3.700**	**2,000**	8.9	310	350
	Summit	CMW-8	6/6/1996	**1.19**	—	<2.500	**2,770**	<25	226	154
	Summit	CMW-8	9/10/1996	**0.757**	—	0.620	**1,080**	<10	37.2	26.8
	Summit	CMW-8	12/4/1996	**0.635**	—	0.523	**1,600**	<2.5	6.86	11.4
	Summit	CMW-8	3/5/1997	**1.81**	**<0.75**	**0.821**	**1,420**	7.56	32.4	49.2
	Summit	CMW-8	3/5/1997	**1.1**	**<0.75**	**0.887**	**1,430**	7.08	29.9	45.2
	Summit	CMW-8	6/24/1997	**1.55**	**<0.75**	**<1**	**1,100**	<0.5	11.1	21.6
	Summit	CMW-8	6/24/1997	**1.69**	**1.03**	**<1**	**1,090**	<0.5	11.1	21.5
	Summit	CMW-8	9/4/1997	**1.46**	**<0.75**	0.563	**885**	<0.5	3.1	7.28
	Summit	CMW-8	12/3/1997	**1.1**	**<0.75**	0.336	**868**	0.63	1.27	<1
	Summit	CMW-8	12/3/1997	**1.44**	**<0.75**	**<1**	**974**	<10	<10	<20
	Summit	CMW-8	3/5/1998	**0.906**	**<0.75**	0.134	**134**	0.65	<0.5	<1
	Summit	CMW-8	3/5/1998	**0.554**	**<0.75**	0.141	**121**	0.78	0.567	<1
	Summit	CMW-8	3/24/1999	**1.07**	—	0.376	**78.3**	2.82	21.6	34
	ERM	CMW-8	4/17/2000	ND	—	ND	ND	ND	ND	ND
	ERM	CMW-8	3/30/2001	0.313	—	ND	1.12	ND	ND	ND
	ERM	CMW-8	3/7/2002	**1.78**	—	0.0685	0.818	ND	0.678	ND
MTCA Method A Cleanup Levels for Groundwater[4]				**0.5**	**0.5**	**0.8/1.0**	**5**	**1,000**	**700**	**1,000**

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CHS Auburn Site
Auburn, Washington
Farallon PN: 301-004

Well Identification	Sampled by	Sample Identification	Sample Date	Analytical Results (milligrams per liter)			Analytical Results (micrograms per liter)			
				DRO[1]	ORO[1]	GRO[2]	Benzene[3]	Toluene[3]	Ethylbenzene[3]	Total Xylenes[3]
CMW-8	ERM	CMW-8	3/19/2003	**1.17**	—	0.717	1.55	<0.5	<0.5	<1
	Farallon	CMW-8-102006	10/20/2006	**0.930**	**<0.606**	<0.050	0.717	<0.500	<0.500	<1.00
	Farallon	CMW8-031308	3/13/2008	<0.27	<0.43	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW8-061708	6/17/2008	<0.27	<0.43	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW8-100208	10/2/2008	<0.28	<0.45	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW8-123008	12/30/2008	<0.28	<0.45	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW8-031909	3/19/2009	<0.27	<0.44	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW8-102909	10/29/2009	<0.25	<0.40	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW8-012610	1/26/2010	<0.26	<0.42	<0.100	<1.0	<1.0	<1.0	2.6
	Farallon	CMW8-042010	4/20/2010	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW8-072010	7/20/2010	<0.27	<0.44	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-8-102210	10/22/2010	<0.29	<0.47	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-8-012411	1/24/2011	<0.26	<0.42	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW8-042711	4/27/2011	<0.26	<0.42	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-8-071911	7/19/2011	<0.28	<0.45	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW8-102111	10/21/2011	<0.26	<0.42	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-8-042612	4/26/2012	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-8-110112	11/1/2012	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-8-042313	4/23/2013	<0.26	<0.42	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-8-102313	10/23/2013	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
CMW-9	Summit	CMW-9	10/5/1994	0.69	—	<0.05	<0.5	<0.5	<0.5	<1
	Summit	CMW-9	11/9/1994	—	—	<0.05	<0.5	<0.5	<0.5	<1
	Summit	CMW-9	12/12/1994	<0.25	—	<0.05	<0.5	<0.5	<0.5	<1
	Summit	CMW-9	1/10/1995	—	—	<0.05	<0.5	<0.5	<0.5	<1
	Summit	CMW-9	2/14/1995	—	—	<0.08	<0.5	<0.5	<0.5	<1
	Summit	CMW-9	3/9/1995	0.35	**<0.75**	<0.05	<0.5	<0.5	<0.5	<1
	Summit	CMW-9	4/5/1995	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-9	5/3/1995	—	—	<0.050	0.68	<0.5	<0.5	<1
	Summit	CMW-9	6/14/1995	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-9	7/12/1995	—	—	<0.050	0.54	<0.5	<0.5	<1
	Summit	CMW-9	8/4/1995	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-9	9/11/1995	**0.50**	—	<0.050	<0.5	<0.5	<0.5	<1
MTCA Method A Cleanup Levels for Groundwater[4]				**0.5**	**0.5**	**0.8/1.0**	**5**	**1,000**	**700**	**1,000**

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Summary of Laboratory Analytical Results for TPH and BTEX in Groundwater
CHS Auburn Site
Auburn, Washington
Farallon PN: 301-004

Well Identification	Sampled by	Sample Identification	Sample Date	Analytical Results (milligrams per liter)			Analytical Results (micrograms per liter)			
				DRO[1]	ORO[1]	GRO[2]	Benzene[3]	Toluene[3]	Ethylbenzene[3]	Total Xylenes[3]
CMW-9	Summit	CMW-9	10/4/1995	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-9	11/2/1995	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-9	12/15/1995	0.26	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-9	1/9/1996	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-9	2/14/1996	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-9	3/6/1996	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-9	4/10/1996	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-9	5/8/1996	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-9	6/5/1996	<0.25	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-9	7/10/1996	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-9	8/7/1996	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-9	9/12/1996	<0.25	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-9	10/10/1996	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-9	10/30/1996	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-9	12/4/1996	<0.25	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-9	3/5/1997	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-9	6/24/1997	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-9	9/4/1997	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-9	12/2/1997	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-9	3/5/1998	0.258	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-9	9/23/1998	<0.25	**<0.75**	<0.05	<0.5	<0.5	<0.5	<1
	Summit	CMW-9	3/23/1999	<0.25	—	<0.05	<0.5	<0.5	<0.5	<1
	ERM	CMW-9	4/18/2000	**1.48**	—	0.546	**77**	ND	ND	2.65
MTCA Method A Cleanup Levels for Groundwater[4]				**0.5**	**0.5**	**0.8/1.0**	**5**	**1,000**	**700**	**1,000**

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Well Identification	Sampled by	Sample Identification	Sample Date	Analytical Results (milligrams per liter)			Analytical Results (micrograms per liter)			
				DRO[1]	ORO[1]	GRO[2]	Benzene[3]	Toluene[3]	Ethylbenzene[3]	Total Xylenes[3]
CMW-10	Summit	CMW-10	12/5/1995	**150**	**8.3**	**1,300**	**4,900**	**7,100**	**4,900**	**32,000**
	Summit	CMW-10	6/6/1996	**59.2**	—	**33.6**	**3,030**	762	**1,570**	**6,970**
	Summit	CMW-10	9/12/1996	**13.3**	—	**53.0**	**7,520**	**3,480**	**1,750**	**8,670**
	Summit	CMW-10	10/11/1996	—	—	**30.3**	**5,910**	271	**1,910**	**5,800**
	Summit	CMW-10	10/31/1996	—	—	**29.6**	**5,320**	205	**1,820**	**5,450**
	Summit	CMW-10	12/5/1996	**23.5**	—	**14.1**	**1,780**	345	630	**2,429**
	Summit	CMW-10	1/8/1997	—	—	**3.8**	**52**	11.1	48.4	23.1
	Summit	CMW-10	2/4/1997	—	—	**883**	**36**	11.6	8.86	67.1
	Summit	CMW-10	3/6/1997	**33.3**	**2.01**	**16.5**	**<200**	<100	<100	<200
	Summit	CMW-10	4/7/1997	—	—	**1.15**	**27.9**	17.5	5	54.8
	Summit	CMW-10	5/8/1997	—	—	**36**	**<100**	<100	<100	<200
	Summit	CMW-10	6/24/1997	**15.3**	**1.98**	**12.3**	**917**	924	29.1	449
	Summit	CMW-10	7/7/1997	—	—	**30**	**984**	**1,310**	51.2	936
	Summit	CMW-10	8/5/1997	—	—	**24.9**	**1,880**	322	**1,050**	**3,490**
	Summit	CMW-10	9/3/1997	**61**	**<0.75**	**26**	**1,570**	151	**927**	**2,500**
	Summit	CMW-10	10/16/1997	—	—	**1,880**	**1,330**	<0.5	**3,670**	**15,100**
	Summit	CMW-10	11/14/1997	—	—	**68.2**	**852**	304	**907**	**3,430**
	Summit	CMW-10	12/3/1997	**63.3**	**<3.75**	0.11	<0.5	0.76	0.601	<1
	Summit	CMW-10	1/29/1998	—	—	**39.6**	**242**	<100	<100	280
	Summit	CMW-10	3/6/1998	**50.1**	**<8.25**	**<25**	**428**	107	26.6	218
	Summit	CMW-10	6/18/1998	**94.1**	**<8.25**	**<76.4**	**810**	213	**701**	**2,450**
	Summit	CMW-10	9/23/1998	**110**	**<8.25**	**265**	**2,160**	**3,720**	**2,750**	**11,100**
	Summit	CMW-10	12/4/1998	**142**	—	**1,440**	**2,900**	**3,100**	**2,850**	**16,400**
	Summit	CMW-10	3/25/1999	**69.5**	—	**264**	**146**	655	282	**2,450**
	Summit	CMW-10	6/15/1999	**52.2**	—	**7.92**	**146**	29.1	76	346
	ERM	CMW-10	10/7/1999	**106**	—	**37.4**	**1,160**	61.4	**1,710**	**5,960**
	ERM	CMW-10	12/31/1999	**106**	—	**21.0**	**156**	329	426	**3,660**
	ERM	CMW-10	4/17/2000	**74.5**	—	**18.1**	**342**	395	348	**2,874**
	ERM	CMW-10	6/13/2000	**248**	—	**27.3**	**567**	417	591	**2,950**
	ERM	CMW-10	10/5/2000	**8.7**	—	**21**	**729**	152	**1,310**	**3,530**
	ERM	CMW-10	1/16/2001	**36.9**	—	**23.9**	**977**	87.9	**1,460**	**3,880**
	ERM	CMW-10	3/30/2001	**91.1**	—	**19.6**	**700**	78.5	**1,230**	**3,170**
MTCA Method A Cleanup Levels for Groundwater[4]				**0.5**	**0.5**	**0.8/1.0**	**5**	**1,000**	**700**	**1,000**

Table 1
Summary of Laboratory Analytical Results for TPH and BTEX in Groundwater
CHS Auburn Site
Auburn, Washington
Farallon PN: 301-004

Well Identification	Sampled by	Sample Identification	Sample Date	Analytical Results (milligrams per liter)			Analytical Results (micrograms per liter)			
				DRO[1]	ORO[1]	GRO[2]	Benzene[3]	Toluene[3]	Ethylbenzene[3]	Total Xylenes[3]
CMW-10	ERM	CMW-10	6/29/2001	**91.4**	—	**34.3**	**496**	<50.0	**1,410**	**2,870**
	ERM	CMW-10	9/28/2001	**118**	ND	**7.68**	**253**	6.53	641	452
	ERM	CMW-10	12/17/2001	**109**	ND	**16.3**	**505**	19.6	**1,410**	**4,530**
	ERM	CMW-10	3/8/2002	**422**	—	**6.42**	**29.1**	29.9	109	1,000
	ERM	CMW-10	7/30/2002	**205**	—	**25.8**	**587**	57.0	**1,230**	**5,940**
	ERM	CMW-10	12/13/2002	**169**	—	**12.4**	**90.5**	9.71	658	**1,670**
	ERM	CMW-10	3/19/2003	**447**	—	**22.9**	**226**	37.9	**860**	**4,680**
	ERM	CMW-10	6/25/2003	**94.9**	—	**30.3**	**320**	66.1	**1,180**	**6,590**
	Farallon	093003-CMW10	9/30/2003	0.332	—	<0.50	<0.5	<0.5	<0.5	<1
	Farallon	CMW-121803-02	12/18/2003	**38.5**	—	**21.7**	**187**	59.2	**1,170**	**7,190**
	Farallon	CMW10-032504	3/25/2004	**112**	—	**12.8**	**45**	28.4	480	**3,760**
	Farallon	CMW10-062804-01	6/28/2004	**385**	—	**26.1**	**49.4**	59.9	**1,050**	**7,330**
	Farallon	CMW10-092104	9/21/2004	**31.9**	**0.648**	**22.5**	**20.4**	67.8	**1,170**	**5,480**
	Farallon	CMW10-122104	12/21/2004	**36**	**<5.0**	**35.5**	**42.2**	416	**1,230**	**9,750**
	Farallon	CMW10-033105	3/31/2005	**49.9**	**<10.0**	**32.7**	**<25**	543	**993**	**8,070**
	Farallon	CMW-10-070805	7/8/2005	**281**	**<50**	**17.1**	**<25**	176	295	**3,240**
	Farallon	CMW-10-093005	9/30/2005	**43.2**	**<10**	**15.2**	**10.9**	62.5	589	**3,520**
	Farallon	CMW-10-122805	12/28/2005	**93.8**	**<10**	**10.1**	**11**	17	291	**1,950**
	Farallon	CMW-10-032806	3/28/2006	**1,070**	**<202**	**8.6**	<5.00	25.6	75.0	**1,540**
	Farallon	CMW-10-042106	4/21/2006	**161**	**<94.3**[10]	—	—	—	—	—
	Farallon	CMW-10-102006	10/20/2006	**697 JH**	**45.5 JH**	**4.29**	3.18	10.4	77.0	527 JL
	Farallon	CMW10-031308	3/13/2008	**1.9**[6]	<0.43	**0.930**[7]	1.2	1.7	4.7	103
	Farallon	QAQC-2-031308[8]	3/13/2008	**1.9**[6]	<0.42	**1.000**[7]	1.2	1.8	4.9	107
	Farallon	CMW10-061708	6/17/2008	**1.9**	<0.41	**1.300**[7]	<4.0	<4.0	12	179
	Farallon	CMW10-061708[8]	6/17/2008	**2.0**	<0.40	**1.300**[7]	<4.0	<4.0	12	181
	Farallon	CMW10-100108	10/1/2008	**0.74**	<0.40	**3.500**	1.9	4.8	64	750
	Farallon	CMW10-123008	12/30/2008	**1.1**[9]	<0.40	**6.100**	4.1	5.3	140	**1,290**
	Farallon	CMW10-031909	3/19/2009	**1.3**[9]	<0.46	**1.600**[7]	<4.0	<4.0	13	204
	Farallon	CMW10-102809	10/28/2009	**0.78**[9]	<0.40	**8.100**	2.7	2.9	140	**1,440**
	Farallon	QAQC-102809[8]	10/28/2009	**5.5**[9]	**0.76**[11]	**8.400**	2.8	3.1	150	**1,570**
	Farallon	CMW10-012610	1/26/2010	**5.8**	**<0.65**[10]	**1.100**[7]	<1.0	<1.0	3.5	76
	Farallon	QAQC-1-012610[8]	1/26/2010	**5.6**	**<0.63**[10]	**1.200**[7]	<1.0	<1.0	3.7	74
MTCA Method A Cleanup Levels for Groundwater[4]				**0.5**	**0.5**	**0.8/1.0**	**5**	**1,000**	**700**	**1,000**

Table 1
Summary of Laboratory Analytical Results for TPH and BTEX in Groundwater
CHS Auburn Site
Auburn, Washington
Farallon PN: 301-004

Well Identification	Sampled by	Sample Identification	Sample Date	Analytical Results (milligrams per liter)			Analytical Results (micrograms per liter)			
				DRO[1]	ORO[1]	GRO[2]	Benzene[3]	Toluene[3]	Ethylbenzene[3]	Total Xylenes[3]
CMW-10	Farallon	CMW10-042010	4/20/2010	**2.7**[9]	<0.41	0.560[7]	<1.0	<1.0	<1.0	19.3
	Farallon	QA/QC-1-042010[8]	4/20/2010	**2.2**[9]	<0.41	0.660[7]	<4.0	<4.0	<4.0	12
	Farallon	CMW10-072010	7/20/2010	**2.3**	**<0.57**[10]	0.740[7]	<1.0	<1.0	1.2	67
	Farallon	CMW-10-102110	10/21/2010	**2.6**	<0.47	**7.200**	<4.0	<4.0	10	**1,430**
	Farallon	CMW-10-012511	1/25/2011	**0.79**	<0.42	<0.400	<4.0	<4.0	<4.0	<8.0
	Farallon	CMW-10-042611	4/26/2011	<0.29	<0.46	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-10-071811	7/18/2011	**1.2**	<0.42	<0.400	<4.0	<4.0	<4.0	<8.0
	Farallon	CMW-10-102111	10/21/2011	**1.48**	<0.41	3.600	<4.0	<4.0	9.6	610
	Farallon	CMW-10-042712	4/27/2012	0.33	<0.43	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-10-110112	11/1/2012	**0.67**[9]	<0.41	**0.840**	1.7	<1.0	1.3	55
	Farallon	CMW-10-042313	4/23/2013	0.30	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-10-1023013	10/23/2013	**1.3**	<0.42	0.260[7]	<1.0	<1.0	<1.0	6.9
CMW-11	Summit	CMW-11	10/26/1994	—	—	<0.05	<0.5	<0.5	<0.5	<1
	Summit	CMW-11	11/10/1994	—	—	<0.05	<0.5	<0.5	<0.5	<1
	Summit	CMW-11	12/7/1994	<0.25	—	<0.05	**160**	<0.5	<0.5	<1
	Summit	CMW-11	1/9/1995	—	—	<0.05	**180**	2.1	<0.5	<1
	Summit	CMW-11	2/14/1995	—	—	<0.08	**3,600**	870	81	370
	Summit	CMW-11	3/10/1995	**0.63**	**0.86**	0.340	**1,000**	26	1.7	69
	Summit	CMW-11	6/15/1995	**0.75**	**0.86**	**41**	**5,200**	**9,300**	**2,200**	**8,900**
	Summit	CMW-11	9/7/1995	**1.1**	—	**1.8**	**760**	62	59	300
	Summit	CMW-11	12/18/1995	**0.60**	**<0.75**	<0.050	**32**	<0.5	<0.5	<1
	Summit	CMW-11	3/7/1996	0.45	**<0.75**	3.000	**110**	3.3	200	420
	Summit	CMW-11	6/6/1996	<0.25	—	<0.050	0.941	<0.5	<0.5	<1
	Summit	CMW-11	9/13/1996	0.25	—	0.053	**23.8**	<0.5	1.97	<1
	Summit	CMW-11	12/5/1996	0.329	—	<0.050	2.87	<0.5	<0.5	<1
	Summit	CMW-11	3/5/1997	0.341	**<0.75**	<0.050	**10.2**	<0.5	<0.5	<1
	Summit	CMW-11	6/24/1997	0.396	**<0.75**	0.072	**17.3**	<0.5	2.6	1.66
	Summit	CMW-11	9/3/1997	0.331	**<0.75**	<0.050	3.16	<0.5	<0.5	1.27
	Summit	CMW-11	12/3/1997	0.426	**<0.75**	<0.050	0.603	<0.5	<0.5	1.9
	Summit	CMW-11	3/6/1998	0.439	**<0.75**	<0.050	4.2	<0.5	<0.5	<1
	Summit	CMW-11	3/25/1999	**0.621**	—	**0.971**	**14**	3.66	32	106
	ERM	CMW-11	4/17/2000	0.253	—	ND	0.716	ND	ND	1.82
MTCA Method A Cleanup Levels for Groundwater[4]				**0.5**	**0.5**	**0.8/1.0**	**5**	**1,000**	**700**	**1,000**

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Summary of Laboratory Analytical Results for TPH and BTEX in Groundwater
CHS Auburn Site
Auburn, Washington
Farallon PN: 301-004

Well Identification	Sampled by	Sample Identification	Sample Date	Analytical Results (milligrams per liter)			Analytical Results (micrograms per liter)			
				DRO[1]	ORO[1]	GRO[2]	Benzene[3]	Toluene[3]	Ethylbenzene[3]	Total Xylenes[3]
CMW-11	ERM	CMW-11	3/30/2001	0.356	—	ND	0.967	ND	0.621	ND
	ERM	CMW-11	3/8/2002	**3.36**	—	ND	1.19	ND	ND	ND
	ERM	CMW-11	3/19/2003	**0.898**	—	<0.05	<0.5	<0.5	<0.5	<1
	Farallon	CMW11-032504	3/25/2004	**0.616**	—	<0.05	<0.5	<0.5	<0.5	<1
	Farallon	CMW11-033105	3/31/2005	<0.25	<0.5	<0.05	<0.5	<0.5	<0.5	<1
	Farallon	CMW-11-070805	7/8/2005	<0.5	<0.5	<0.05	<0.5	<0.5	<0.5	<1
	Farallon	CMW-11-093005	9/30/2005	**0.681**	<0.5	<0.05	<0.5	<0.5	<0.5	<1
	Farallon	CMW-11-032806	3/28/2006	**0.776**	<0.476	<0.050	<0.500	<0.500	<0.500	<1.00
	Farallon	CMW-11-102006	10/20/2006	<0.250	<0.500	<0.250	<2.50	<2.50	<2.50	<5.00
	Farallon	CMW11-031308	3/13/2008	<0.25	<0.40	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW11-061708	6/17/2008	<0.27	<0.42	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW11-100108	10/1/2008	<0.25	<0.40	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW11-123008	12/30/2008	<0.25	<0.40	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW11-031909	3/19/2009	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW11-102809	10/28/2009	<0.25	<0.40	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW11-012610	1/26/2010	<0.25	<0.40	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW11-042010	4/20/2010	<0.26	<0.42	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW11-072010	7/20/2010	<0.27	<0.44	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-11-102110	10/21/2010	<0.27	<0.43	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-11-012511	1/25/2011	<0.26	<0.42	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW11-042711	4/27/2011	<0.26	<0.42	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-11-071811	7/18/2011	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-11-102111	10/21/2011	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
MTCA Method A Cleanup Levels for Groundwater[4]				**0.5**	**0.5**	**0.8/1.0**	**5**	**1,000**	**700**	**1,000**

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CHS Auburn Site
Auburn, Washington
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Well Identification	Sampled by	Sample Identification	Sample Date	Analytical Results (milligrams per liter)			Analytical Results (micrograms per liter)			
				DRO[1]	ORO[1]	GRO[2]	Benzene[3]	Toluene[3]	Ethylbenzene[3]	Total Xylenes[3]
CMW-12	Summit	CMW-12	11/8/1994	—	—	**7.2**	**7,600**	280	**790**	910
	Summit	CMW-12	12/6/1994	**0.93**	—	**3**	**4,200**	70	310	350
	Summit	CMW-12	1/5/1995	—	—	**5.3**	**6,000**	75	420	430
	Summit	CMW-12	2/14/1995	—	—	**10**	**10,000**	990	**740**	**1,500**
	Summit	CMW-12	3/10/1995	**0.90**	**1.1**	**8.3**	**8,300**	770	670	**1,600**
	Summit	CMW-12	4/6/1995	—	—	**11**	**8,300**	370	630	**1,500**
	Summit	CMW-12	5/3/1995	—	—	**9.6**	**10,000**	250	**870**	**2,000**
	Summit	CMW-12	6/15/1995	**0.70**	**<0.75**	**23**	**13,000**	**1,100**	**1,600**	**4,600**
	Summit	CMW-12	7/12/1995	—	—	**12**	**9,400**	140	**980**	**2,500**
	Summit	CMW-12	8/7/1995	—	—	**6.1**	**7,200**	43	**710**	**1,000**
	Summit	CMW-12	9/11/1995	**0.96**	—	**4.5**	**4,400**	11	470	570
	Summit	CMW-12	10/4/1995	—	—	**9.3**	**5,900**	<20	**840**	980
	Summit	CMW-12	11/2/1995	—	—	**5.3**	**4,000**	<20	540	520
	Summit	CMW-12	12/5/1995	**0.90**	**<0.75**	**5.2**	**4,600**	17	580	510
	Summit	CMW-12	1/9/1996	—	—	**9.8**	**6,000**	38	**1,200**	**1,000**
	Summit	CMW-12	2/15/1996	—	—	**20**	**7,800**	87	**1,600**	**2,700**
	Summit	CMW-12	3/6/1996	**3.40**	**<0.75**	**27**	**8,900**	130	**1,600**	**3,200**
	Summit	CMW-12	4/10/1996	—	—	**14**	**4,900**	46	**1,200**	**1,800**
	Summit	CMW-12	5/8/1996	—	—	**9.52**	**6,320**	30	**1,080**	**1,480**
	Summit	CMW-12	6/6/1996	**1.62**	—	**6.57**	**4,380**	25.8	642	743
	Summit	CMW-12	7/10/1996	—	—	**6.27**	**4,770**	31.5	604	738
	Summit	CMW-12	8/7/1996	—	—	**9.09**	**4,620**	64.4	**789**	984
	Summit	CMW-12	9/10/1996	**1.56**	—	**9.15**	**6,790**	20.9	**816**	880
	Summit	CMW-12	10/11/1996	—	—	**4.79**	**3,890**	8.63	473	447
MTCA Method A Cleanup Levels for Groundwater[4]				**0.5**	**0.5**	**0.8/1.0**	**5**	**1,000**	**700**	**1,000**

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Well Identification	Sampled by	Sample Identification	Sample Date	Analytical Results (milligrams per liter)			Analytical Results (micrograms per liter)			
				DRO[1]	ORO[1]	GRO[2]	Benzene[3]	Toluene[3]	Ethylbenzene[3]	Total Xylenes[3]
CMW-12	Summit	CMW-12	10/31/1996	—	—	**4.55**	**3,500**	10.5	461	381
	Summit	CMW-12	12/4/1996	**1.73**	—	**3.37**	**3,680**	11.0	436	320
	Summit	CMW-12	6/24/1997	**2.31**	**<0.75**	**6.31**	**3,370**	<0.5	542	544
	Summit	CMW-12	9/4/1997	**2.03**	**<0.75**	**6.23**	**4,660**	<11	354	310
	Summit	CMW-12	12/3/1997	**1.44**	**<0.75**	**3.13**	**2,080**	10.9	328	220
	Summit	CMW-12	3/5/1998	**3.76**	**<0.75**	**7.25**	**2,960**	36.2	608	609
	Summit	CMW-12	3/24/1999	**4.8**	—	**10.4**	**2,600**	79.2	**826**	**2,260**
	ERM	CMW-12	4/18/2000	**2.8**	—	ND	**2,650**	ND	243	499
	ERM	CMW-12	3/30/2001	0.41	—	ND	**725**	ND	47.4	23.3
	ERM	CMW-12	3/7/2002	**10.2**	—	**4.28**	**660**	7.05	307	455
	ERM	CMW-12	3/20/2003	**4.23**	—	**2.01**	**351**	4.58	135	170
	Farallon	CMW12-032404	3/24/2004	**7.07**	—	**3.56**	**441**	9.44	168	538
	Farallon	CMW12-033105	3/31/2005	**4.03**	<0.5	**2.3**	**253**	3.34	67.4	60.4
	Farallon	CMW-12-032806	3/28/2006	**8.31**	**<2.40**	**1.89**	**87.2**	1.72	71.1	18.5
	Farallon	CMW-12-101806	10/18/2006	**1.66**	<0.500	**2.23 JH**	**146**	2.57 JH	87.7 JH	128 JH
	Farallon	CMW12-031308	3/13/2008	<0.25	<0.40	0.760	**22**	<1.0	17	15
	Farallon	CMW12-061708	6/17/2008	<0.25	<0.40	0.780	**21**	<4.0	15	11
	Farallon	CMW12-100108	10/1/2008	<0.40	<0.41	**0.800**	**18**	<4.0	24	8.4
	Farallon	QA/QC-1-100108[8]	10/1/2008	<0.45	<0.41	**0.820**	**17**	<1.0	23	7.7
	Farallon	CMW12-123008	12/30/2008	<0.26	<0.42	**0.890**	**19**	<1.0	28	14
	Farallon	CMW12-031909	3/19/2009	<0.28	<0.44	**0.980**	**25**	<4.0	26	20
	Farallon	CMW12-102809	10/28/2009	**1.3**	<0.40	0.440	**7.2**	<1.0	1.4	<2.0
	Farallon	QAQC3-102809[8]	10/28/2009	**1.4**	0.41[10]	0.460	**7.4**	<1.0	1.4	<2.0
	Farallon	CMW12-012610	1/26/2010	<0.39[10]	<0.43	**0.980**	**8.5**	<1.0	12	4.3
	Farallon	CMW12-042010	4/20/2010	**<0.61[10]**	<0.43	**1.200**	**12**	<4.0	17	14
	Farallon	CMW12-072110	7/21/2010	<0.44[10]	<0.45	**1.300[7]**	**13**	<1.0	25	16.2
	Farallon	Dup-CMW12-072110[8]	7/21/2010	<0.49[10]	<0.44	**1.300[7]**	**13**	<1.0	26	15
	Farallon	CMW-12-102110	10/21/2010	<0.36	<0.41	0.660	**7.6**	<1.0	4.6	2.6
	Farallon	dup-CMW-12-102110[8]	10/21/2010	<0.46	<0.43	0.610	**7.1**	<1.0	5.1	2.4
	Farallon	CMW-12-012511	1/25/2011	<0.48	<0.41	**1.100**	**6.2**	<4.0	<4.0	4.4
	Farallon	QA/QC-2-012511[8]	1/25/2011	<0.48	<0.41	**1.100**	**6.4**	<4.0	<4.0	4.2
MTCA Method A Cleanup Levels for Groundwater[4]				**0.5**	**0.5**	**0.8/1.0**	**5**	**1,000**	**700**	**1,000**

Table 1
Summary of Laboratory Analytical Results for TPH and BTEX in Groundwater
CHS Auburn Site
Auburn, Washington
Farallon PN: 301-004

Well Identification	Sampled by	Sample Identification	Sample Date	Analytical Results (milligrams per liter)			Analytical Results (micrograms per liter)			
				DRO[1]	ORO[1]	GRO[2]	Benzene[3]	Toluene[3]	Ethylbenzene[3]	Total Xylenes[3]
CMW-12	Farallon	CMW12-042611	4/26/2011	**<0.62**[10]	<0.41	**1.500**	**9.7**	<4.0	15	8.4
	Farallon	QA/QC-1-042611[8]	4/26/2011	**<0.63**[10]	<0.41	**1.500**	**9.1**	<4.0	15	8.1
	Farallon	CMW-12-071911	7/19/2011	**<0.73**[10]	<0.43	**1.600**	**11**	<1.0	11	11
	Farallon	CMW-12-102111	10/21/2011	**<0.41**[10]	<0.42	**0.780**	**5.4**	<1.0	1.6	1.2
	Farallon	DUP-2-102111[8]	10/21/2011	**<0.42**[10]	<0.41	**0.750**	**5.4**	<1.0	1.5	1.2
	Farallon	CMW-12-042612	4/26/2012	**<0.90**[10]	<0.44	**1.600**	**7.1**	1.1	6.4	14
	Farallon	QA/QC-1-042612[8]	4/26/2012	**<0.84**[10]	<0.44	**1.600**	**7.1**	1.2	6.5	13
	Farallon	CMW-12-110112	11/1/2012	**0.56**[9]	<0.41	**0.850**	4.7	<1.0	<1.0	1.5
	Farallon	DUP1-110112[8]	11/1/2012	0.46[9]	<0.41	**0.890**	**5.1**	<1.0	<1.0	2.0
	Farallon	CMW-12-042313	4/23/2013	**<0.60**[10]	<0.43	0.390	2.6	<1.0	<1.0	1.6
	Farallon	DUP1-042313[8]	4/23/2013	**<0.52**[10]	<0.43	0.390	2.1	<1.0	<1.0	1.5
	Farallon	CMW-12-102313	10/23/2013	**<0.55**[10]	<0.41	0.740	3.1	<1.0	<1.0	<2.0
	Farallon	DUP2-102313[8]	10/23/2013	<0.48[10]	<0.41	0.790	3.0	<1.0	<1.0	<2.0
CMW-13	Summit	CMW-13	11/8/1994	—	—	**18**	**10,000**	**1,200**	**1,200**	**3,200**
	Summit	CMW-13	12/6/1994	**1.6**	—	**27**	**11,000**	**2,400**	**1,400**	**4,100**
	Summit	CMW-13	1/9/1995	—	—	**19**	**9,400**	950	**1,300**	**4,100**
	Summit	CMW-13	2/14/1995	—	—	**21**	**45**	7.1	5.7	16
	Summit	CMW-13	3/10/1995	**1.2**	**0.85**	**25**	**9,100**	**2,800**	**1,100**	**3,800**
	Summit	CMW-13	6/15/1995	**1.4**	**<0.75**	**58**	**20,000**	**9,600**	**2,200**	**8,900**
	Summit	CMW-13	9/8/1995	**3.1**	—	**18**	**9,300**	80	**1,300**	**3,200**
	Summit	CMW-13	12/18/1995	**2.4**	**<0.75**	**10**	**2,900**	13	570	**1,300**
	Summit	CMW-13	2/15/1996	—	—	**33**	**1,100**	**1,300**	230	**7,400**
	Summit	CMW-13	3/6/1996	**2.9**	**<0.75**	**2.3**	**380**	6.4	<0.5	270
	Summit	CMW-13	6/6/1996	**2.27**	—	**15.9**	**3,930**	347	**833**	**2,560**
	Summit	CMW-13	9/13/1996	**2.07**	—	**15.5**	**3,880**	38.2	**986**	**2,550**
	Summit	CMW-13	10/11/1996	—	—	**12.5**	**1,920**	13.5	**761**	**1,780**
	Summit	CMW-13	10/31/1996	—	—	**12.1**	**1,130**	<0.5	**754**	**1,810**
	Summit	CMW-13	12/4/1996	**2.11**	—	**5.4**	**812**	3.56	355	724
	Summit	CMW-13	1/8/1997	—	—	0.101	**13.9**	1.01	<0.5	14.7
	Summit	CMW-13	2/4/1997	—	—	<0.05	1.52	<0.5	<0.5	<1
	Summit	CMW-13	3/5/1997	<0.25	**<0.75**	<0.05	0.863	<0.5	<0.5	<1
MTCA Method A Cleanup Levels for Groundwater[4]				**0.5**	**0.5**	**0.8/1.0**	**5**	**1,000**	**700**	**1,000**

Table 1
Summary of Laboratory Analytical Results for TPH and BTEX in Groundwater
CHS Auburn Site
Auburn, Washington
Farallon PN: 301-004

Well Identification	Sampled by	Sample Identification	Sample Date	Analytical Results (milligrams per liter)			Analytical Results (micrograms per liter)			
				DRO[1]	ORO[1]	GRO[2]	Benzene[3]	Toluene[3]	Ethylbenzene[3]	Total Xylenes[3]
CMW-13	Summit	CMW-13	4/7/1997	—	—	**1.6**	**6.81**	16.7	9.57	64.8
	Summit	CMW-13	5/8/1997	—	—	0.515	**129**	<0.5	28.9	49.1
	Summit	CMW-13	6/24/1997	**2.63**	**<0.75**	**3.63**	**529**	15	178	316
	Summit	CMW-13	7/7/1997	—	—	**6.13** JH	**835** JH	21.1 JH	266 JH	514 JH
	Summit	CMW-13	8/4/1997	—	—	**9.56**	**2,640**	188	307	**1,340**
	Summit	CMW-13	9/4/1997	**2.7**	**<0.75**	**7.39**	**1,990**	15.4	295	563
	Summit	CMW-13	10/16/1997	—	—	**2.56**	**332**	2.68	92.7	121
	Summit	CMW-13	11/13/1997	—	—	0.625	**100**	0.565	19.1	10.8
	Summit	CMW-13	12/3/1997	**1.8**	**<0.75**	0.424	**112**	<2.5	21.3	11.4
	Summit	CMW-13	1/29/1998	—	—	**1.57**	**71.1**	1.46	63.9	133
	Summit	CMW-13	3/5/1998	**5.42**	**<0.75**	0.628	**112**	1.2	29	27.8
	Summit	CMW-13	6/17/1998	**4.31**	**<0.75**	**8.33**	**1,020**	<0.5	228	**1,020**
	Summit	CMW-13	9/29/1998	**2.14**	**<0.75**	**3.15**	**353**	8.73	66.3	98
	Summit	CMW-13	12/4/1998	**1.91**	—	**3.72**	**353**	37	147	388
	Summit	CMW-13	3/24/1999	**3.22**	—	0.142	**14.1**	<0.5	11.7	8.44
	Summit	CMW-13	6/15/1999	**4.53**	—	**8.38**	**840**	<33.4	359	**1,380**
	ERM	CMW-13	10/7/1999	**5.3**	—	**8.06**	**756**	<25	395	**1,010**
	ERM	CMW-13	12/31/1999	**2.3**	—	**1.26**	**203**	3.47	210	90.5
	ERM	CMW-13	4/18/2000	**2.66**	—	**5.23**	**721**	14.7	569	928
	ERM	CMW-13	6/13/2000	**1.45**	—	**4.22**	**385**	6.91	363	611
	ERM	CMW-13	10/5/2000	**2.11**	—	**3.69**	**225**	ND	221	309
	ERM	CMW-13	12/26/2000	**0.928**	—	**2.97**	**162**	ND	79.8	113
	ERM	CMW-13	3/30/2001	**0.853**	—	**3.68**	**132**	ND	67.2	174
	ERM	CMW-13	6/29/2001	**1.75**	—	**2.49**	**88.8**	1.71	45.8	71.3
	ERM	CMW-13	9/28/2001	**1.44**	ND	0.714	**33.9**	0.603	1.38	1.95
	ERM	CMW-13	12/17/2001	**2.52**	ND	**1.29**	**49.2**	1.05	30.4	26.4
	ERM	CMW-13	3/7/2002	**2.52**	ND	0.709	**28.7**	1.00	29.7	16.8
	ERM	CMW-13	7/30/2002	**4.17**	ND	**3.56**	**156**	2.43	176	223
	ERM	CMW-13	12/13/2002	**1.95**	ND	**1.45**	**55.7**	1.02	18.4	14.9
	ERM	CMW-13	3/20/2003	**4.92**	ND	**1.40**	**25.0**	1.12	28.5	13.1
	ERM	CMW-13	6/25/2003	**6.33**	ND	**2.10**	**48.3**	1.37	141	82.9
MTCA Method A Cleanup Levels for Groundwater[4]				**0.5**	**0.5**	**0.8/1.0**	**5**	**1,000**	**700**	**1,000**

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CHS Auburn Site
Auburn, Washington
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Well Identification	Sampled by	Sample Identification	Sample Date	Analytical Results (milligrams per liter)			Analytical Results (micrograms per liter)			
				DRO[1]	ORO[1]	GRO[2]	Benzene[3]	Toluene[3]	Ethylbenzene[3]	Total Xylenes[3]
CMW-13	Farallon	093003-CMW13	9/30/2003	**2.41**	—	**0.84**	**23.1**	0.60	20.4	8.58
	Farallon	CMW-121803-01	12/18/2003	**2.07**	—	0.776	**32.9**	1.51	46.7	11.6
	Farallon	CMW13-032404	3/24/2004	**6.87**	—	**1.81**	**25.2**	1.57	315	150
	Farallon	CMW13-062804-01	6/28/2004	**4.28**	—	**6.03**	**17.9**	<2.5	**966**	685
	Farallon	CMW13-092104	9/21/2004	**2.47**	<0.5	**3.71**	**13.1**	<2.5	359	450
	Farallon	CMW13-122104	12/21/2004	**1.58**	<0.5	**1.56**	**12.9**	1.16	43.1	111
	Farallon	CMW13-033105	3/31/2005	**2.63**	<0.5	**1.69**	**8.24**	1.62	137	151
	Farallon	CMW-13-070705	7/7/2005	**2.67**	<0.5	**3.56**	**8.23**	1.94	227	194
	Farallon	CMW-13-093005	9/30/2005	**2.59**	<0.5	**4.95**	**7.9**	<2.5	430	360
	Farallon	CMW-13-122705	12/27/2005	**1.53**	<0.5	**1.000**	**5.95**	0.877	31.3	18.3
	Farallon	CMW-13-032806	3/28/2006	**3.81**	<0.495	0.439	4.48	0.747	22.5	6.31
	Farallon	CMW-13-101806	10/18/2006	**1.68**	<0.500	**1.49**	3.91	0.844	109	37.5
	Farallon	CMW13-031308	3/13/2008	<0.26	<0.42	<0.100	1.1	<1.0	<1.0	<2.0
	Farallon	CMW13-061708	6/17/2008	<0.26	<0.41	<0.100	1.1	<1.0	<1.0	<2.0
	Farallon	CMW13-100108	10/1/2008	<0.55	<0.43	**1.000**	<4.0	<4.0	21	11
	Farallon	CMW13-123008	12/30/2008	<0.25	<0.40	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW13-031909	3/19/2009	<0.25	<0.40	<0.100	1.2	<1.0	<1.0	<2.0
	Farallon	CMW13-102909	10/29/2009	**1.6**	<0.40	**0.860**	2.2	<1.0	1.3	<1.0
	Farallon	CMW13-012609	1/26/2009	<0.27	<0.43	0.110	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW13-012609	4/20/2010	<0.26	<0.41	0.120	<1.0	<1.0	2.7	<2.0
	Farallon	CMW-13-072010	7/20/2010	<0.28	<0.45	0.140	<1.0	<1.0	2.6	<2.0
	Farallon	CMW-13-102110	10/21/2010	**<0.60**	<0.43	**0.840**	2.2	<1.0	5.5	4.5
	Farallon	CMW-13-012511	1/25/2011	<0.26	<0.42	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW13-042711	4/27/2011	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-13-071911	7/19/2011	<0.31	<0.50	0.130	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW13-102011	10/20/2011	<0.30	<0.46	0.460	1.7	<1.0	<1.0	<2.0
	Farallon	CMW-13-042612	4/26/2012	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-13-110112	11/1/2012	<0.26	<0.42	0.170	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-13-042213	4/22/2013	<0.27	<0.43	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-13-102213	10/22/2013	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
MTCA Method A Cleanup Levels for Groundwater[4]				**0.5**	**0.5**	**0.8/1.0**	**5**	**1,000**	**700**	**1,000**

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CHS Auburn Site
Auburn, Washington
Farallon PN: 301-004

Well Identification	Sampled by	Sample Identification	Sample Date	Analytical Results (milligrams per liter)			Analytical Results (micrograms per liter)			
				DRO[1]	ORO[1]	GRO[2]	Benzene[3]	Toluene[3]	Ethylbenzene[3]	Total Xylenes[3]
CMW-15	Summit	CMW-15	12/14/1994	—	—	0.14	**120**	14	0.86	13
	Summit	CMW-15	1/10/1995	—	—	0.72	**760**	37	46	110
	Summit	CMW-15	2/14/1995	—	—	**1.4**	**1,400**	<0.5	130	180
	Summit	CMW-15	3/9/1995	0.44	**<0.75**	**2.0**	**2,000**	27	170	290
	Summit	CMW-15	4/5/1995	—	—	**2.9**	**2,300**	13	220	320
	Summit	CMW-15	5/3/1995	—	—	**2.0**	**2,600**	2.7	210	220
	Summit	CMW-15	6/15/1995	<0.25	**<0.75**	**1.4**	**1,100**	1.3	140	82
	Summit	CMW-15	7/12/1995	—	—	**1.3**	**940**	19	120	64
	Summit	CMW-15	8/7/1995	—	—	**1.6**	**1,000**	<2	210	90
	Summit	CMW-15	8/25/1995	—	—	**1.6**	**730**	0.82	160	83
	Summit	CMW-15	9/11/1995	**0.57**	—	**1.1**	**490**	<2	130	52
	Summit	CMW-15	10/4/1995	—	—	**1.0**	**450**	<2	120	42
	Summit	CMW-15	11/2/1995	—	—	**0.950**	**360**	4.6	110	48
	Summit	CMW-15	12/18/1995	0.35	**<0.75**	0.430	**80**	1	48	3.7
	Summit	CMW-15	1/9/1996	—	—	0.300	**73**	0.66	35	3
	Summit	CMW-15	2/14/1996	—	—	0.620	**310**	<0.5	71	9.9
	Summit	CMW-15	3/6/1996	**0.63**	**<0.75**	**1.100**	**410**	2.5	100	31
	Summit	CMW-15	4/10/1996	—	—	0.380	**13**	0.75	26	1.2
	Summit	CMW-15	5/8/1996	—	—	0.236	**28**	0.53	12.4	<1
	Summit	CMW-15	6/5/1996	**0.756**	—	0.514	**211**	0.802	56.5	2.19
	Summit	CMW-15	7/10/1996	—	—	0.226	**23**	<0.5	16.3	<1
	Summit	CMW-15	8/7/1996	—	—	0.268	**8.77**	<0.5	21.3	1.04
	Summit	CMW-15	9/12/1996	0.414	—	0.298	**90.9**	<0.5	29.3	6.14
	Summit	CMW-15	10/10/1996	—	—	0.572	**241**	0.647	48.3	20.8
	Summit	CMW-15	10/30/1996	—	—	0.656	**192**	0.817	61.2	22.2
	Summit	CMW-15	12/4/1996	0.397	—	0.328	**140**	<0.5	23.4	2.40
	Summit	CMW-15	1/8/1997	—	—	0.0852	**<8.64**	<0.5	<0.5	<1
	Summit	CMW-15	1/8/1997	—	—	0.76	**8.52**	<0.5	<0.5	<1
	Summit	CMW-15	2/4/1997	—	—	**131**	**71.3**	<0.5	3.54	<1
	Summit	CMW-15	2/4/1997	—	—	**87.3**	**51.7**	<0.5	2.36	<1
	Summit	CMW-15	3/5/1997	0.455	**<0.75**	<0.05	1.9	<0.5	<0.5	<1
	Summit	CMW-15	4/7/1997	—	—	<0.05	1.82	<0.5	<0.5	<1
	Summit	CMW-15	4/7/1997	—	—	<0.05	1.82	<0.5	<0.5	<1
	Summit	CMW-15	5/8/1997	—	—	0.0768	3.34	<0.5	2.39	<1
MTCA Method A Cleanup Levels for Groundwater[4]				**0.5**	**0.5**	**0.8/1.0**	**5**	**1,000**	**700**	**1,000**

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CHS Auburn Site
Auburn, Washington
Farallon PN: 301-004

Well Identification	Sampled by	Sample Identification	Sample Date	Analytical Results (milligrams per liter)			Analytical Results (micrograms per liter)			
				DRO[1]	ORO[1]	GRO[2]	Benzene[3]	Toluene[3]	Ethylbenzene[3]	Total Xylenes[3]
CMW-15	Summit	CMW-15	5/8/1997	—	—	0.0686	3.56	<0.5	2.51	<1
	Summit	CMW-15	6/24/1997	**0.867**	**0.774**	0.102	**5.91**	<0.5	2.58	<1
	Summit	CMW-15	7/7/1997	—	—	0.122	**14.3**	<0.5	3.85	<1
	Summit	CMW-15	7/7/1997	—	—	0.145	**12.5**	0.626	3.63	<1
	Summit	CMW-15	8/4/1997	—	—	0.16	1.85	<0.5	0.67	<1
	Summit	CMW-15	8/4/1997	—	—	0.168	1.74	<0.5	0.62	<1
	Summit	CMW-15	9/4/1997	—	—	0.132	1.96	<0.5	<0.5	<1
	Summit	CMW-15	10/16/1997	—	—	0.181	**71.1**	<0.5	1.85	<1
	Summit	CMW-15	10/16/1997	—	—	0.22	**73.3**	0.532	1.92	1.16
	Summit	CMW-15	11/13/1997	—	—	0.27	**103**	0.532	<0.5	<1
	Summit	CMW-15	11/13/1997	—	—	0.26	**103**	0.533	<0.5	<1
	Summit	CMW-15	12/2/1997	**0.704**	**<0.75**	0.0991	**21**	<0.5	<0.5	<1
	Summit	CMW-15	1/29/1998	—	—	0.0878	**9.19**	<0.5	<0.5	<1
	Summit	CMW-15	3/5/1998	0.445	**<0.75**	0.0758	2.06	<0.5	<0.5	<1
	Summit	CMW-15	6/18/1998	0.417	**<0.75**	0.0595	<0.5	<0.5	<0.5	<1
	Summit	CMW-15	9/23/1998	0.29	**<0.75**	0.059	<0.5	<0.5	<0.5	<1
	Summit	CMW-15	12/4/1998	0.251	—	0.0595	<0.5	<0.5	<0.5	<1
	Summit	CMW-15	3/23/1999	0.319	—	0.093	**7.6**	<0.5	8.85	<1
	Summit	CMW-15	6/14/1999	**0.879**	—	0.069	<0.5	<0.5	<0.5	<1
	ERM	CMW-15	10/8/1999	<0.25	—	<0.050	<0.5	<0.5	<0.5	<1
	ERM	CMW-15	12/31/1999	<0.25	—	<0.050	<0.5	<0.5	<0.5	<1
	ERM	CMW-15	4/17/2000	ND	—	ND	ND	ND	ND	ND
	ERM	CMW-15	6/13/2000	ND	—	ND	ND	ND	ND	ND
	ERM	CMW-15	10/5/2000	**0.587**	—	0.066	1.5	ND	ND	1.17
	ERM	CMW-15	12/26/2000	ND	—	0.081	0.57	ND	ND	ND
	ERM	CMW-15	3/30/2001	ND	—	ND	ND	ND	ND	ND
	ERM	CMW-15	6/29/2001	<0.25	—	<0.050	<0.5	<0.5	<0.5	<1
	ERM	CMW-15	9/28/2001	0.297	ND	ND	ND	ND	ND	ND
	ERM	CMW-15	12/17/2001	ND	ND	ND	ND	0.802	ND	ND
	ERM	CMW-15	3/6/2002	**0.762**	—	ND	0.581	ND	ND	ND
	ERM	CMW-15	7/30/2002	**1.28**	—	ND	ND	ND	ND	ND
MTCA Method A Cleanup Levels for Groundwater[4]				**0.5**	**0.5**	**0.8/1.0**	**5**	**1,000**	**700**	**1,000**

Table 1
Summary of Laboratory Analytical Results for TPH and BTEX in Groundwater
CHS Auburn Site
Auburn, Washington
Farallon PN: 301-004

Well Identification	Sampled by	Sample Identification	Sample Date	Analytical Results (milligrams per liter)			Analytical Results (micrograms per liter)			
				DRO[1]	ORO[1]	GRO[2]	Benzene[3]	Toluene[3]	Ethylbenzene[3]	Total Xylenes[3]
CMW-15	ERM	CMW-15	12/12/2002	**0.603**	—	0.0574	ND	ND	ND	ND
	ERM	CMW-15	3/20/2003	0.475	—	0.513	<0.5	<0.5	<0.5	<1
	ERM	CMW-15	6/24/2003	**0.731**	—	ND	ND	ND	ND	ND
	Farallon	093003-CMW15	9/30/2003	**0.686**	—	< 0.050	<0.5	<0.5	<0.5	<1
	Farallon	CMW-121703-03	12/17/2003	0.417	—	< 0.05	< 0.5	< 0.5	< 0.5	< 1
	Farallon	CMW15-032404	3/24/2004	**0.847**	—	<0.05	0.974	<0.5	0.92	1.71
	Farallon	CMW15-062804-01	6/28/2004	0.65	—	<0.05	<0.5	<0.5	<0.5	<1
	Farallon	CMW15-092104	9/21/2004	**0.775**	<0.5	<0.05	<0.5	<0.5	<0.5	<1
	Farallon	CMW15-122104	12/21/2004	0.44	<0.5	<0.05	<0.5	<0.5	<0.5	<1
	Farallon	CMW15-033105	3/31/2005	**0.508**	<0.5	0.551	<0.5	<0.5	<0.5	<1
	Farallon	CMW-15-070705	7/7/2005	**0.887**	<0.5	0.0624	0.535	<0.5	<0.5	<1
	Farallon	CMW-15-093005	9/30/2005	**0.568**	<0.5	0.0567	<0.5	<0.5	<0.5	<1
	Farallon	CMW-15-122805	12/28/2005	0.266	<0.5	<0.05	<0.5	<0.5	<0.5	<1
	Farallon	CMW-15-032706	3/27/2006	**0.525**	<0.472	<0.050	<0.500	<0.500	<0.500	<1.00
	Farallon	CMW-15-101906	10/19/2006	<0.250	<0.500	<0.050	<0.500	<0.500	<0.500	<1.00
	Farallon	CMW15-031308	3/13/2008	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW15-061708	6/17/2008	<0.25	<0.40	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW15-100208	10/2/2008	<0.25	<0.40	<0.400	<4.0	<4.0	<4.0	<8.0
	Farallon	CMW15-123008	12/30/2008	<0.28	<0.44	<0.100	<1.0	<1.0	<1.0	<1.0
	Farallon	CMW15-031909	3/19/2009	<0.28	<0.44	<0.100	<1.0	<1.0	<1.0	<1.0
	Farallon	CMW15-102909	10/29/2009	<0.25	<0.40	<0.100	<1.0	<1.0	<1.0	<1.0
	Farallon	CMW15-012610	1/26/2010	<0.25	<0.40	<0.100	<1.0	<1.0	<1.0	<1.0
	Farallon	CMW15-042010	4/20/2010	<0.27	<0.43	<0.100	<1.0	<1.0	<1.0	<1.0
	Farallon	CMW15-072010	7/20/2010	<0.28	<0.44	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-15-102210	10/22/2010	<0.28	<0.44	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-15-012511	1/25/2011	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW15-042711	4/27/2011	<0.26	<0.42	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-15-071911	7/19/2011	<0.29	<0.47	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW15-102111	10/21/2011	<0.27	<0.44	<0.100	<1.0	<1.0	<1.0	<2.0
CMW-16	Summit	CMW-16	12/15/1994	—	—	<0.05	<0.5	<0.5	<0.5	<1
	Summit	CMW-16	1/11/1995	—	—	<0.05	2.8	<0.5	<0.5	<1
	Summit	CMW-16	2/13/1995	—	—	<0.08	**79**	<0.5	<0.5	<1
MTCA Method A Cleanup Levels for Groundwater[4]				**0.5**	**0.5**	**0.8/1.0**	**5**	**1,000**	**700**	**1,000**

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CHS Auburn Site
Auburn, Washington
Farallon PN: 301-004

Well Identification	Sampled by	Sample Identification	Sample Date	Analytical Results (milligrams per liter)			Analytical Results (micrograms per liter)			
				DRO[1]	ORO[1]	GRO[2]	Benzene[3]	Toluene[3]	Ethylbenzene[3]	Total Xylenes[3]
CMW-17	Summit	CMW-17	12/15/1994	—	—	0.095	**1,500**	<0.5	<0.5	<1
	Summit	CMW-17	1/12/1995	—	—	0.058	**1,000**	<0.5	<0.5	<1
	Summit	CMW-17	2/9/1995	—	—	<0.05	**170**	<0.5	<0.5	<1
	Summit	CMW-17	3/9/1995	<0.25	**<0.75**	<0.05	**12**	<0.5	<0.5	<1
	Summit	CMW-17	4/5/1995	—	—	<0.050	4.4	0.77	<0.5	<1
	Summit	CMW-17	5/2/1995	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-17	6/13/1995	<0.25	**<0.75**	<0.050	**340**	1.4	1.1	6.8
	Summit	CMW-17	7/12/1995	—	—	0.500	**1,200**	8.8	20	38
	Summit	CMW-17	8/7/1995	—	—	0.580	**1,600**	1.1	37	58
	Summit	CMW-17	9/8/1995	0.27	—	0.290	**680**	<0.5	25	13
	Summit	CMW-17	10/3/1995	—	—	0.140	**640**	<0.5	7.6	1.7
	Summit	CMW-17	11/2/1995	—	—	0.180	**130**	<0.5	11	13
	Summit	CMW-17	12/15/1995	0.30	**0.88**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-17	1/9/1996	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-17	2/13/1996	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-17	3/6/1996	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-17	4/10/1996	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-17	5/7/1996	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-17	6/4/1996	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-17	7/9/1996	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-17	8/6/1996	—	—	<0.050	**26.6**	<0.5	<0.5	<1
	Summit	CMW-17	9/9/1996	0.277	—	<0.050	0.786	<0.5	<0.5	<1
	Summit	CMW-17	10/10/1996	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-17	10/30/1996	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-17	12/2/1996	0.275	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-17	1/8/1997	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-17	2/4/1997	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-17	3/4/1997	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-17	4/7/1997	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-17	5/8/1997	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-17	6/23/1997	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-17	7/7/1997	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-17	8/4/1997	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-17	9/3/1997	0.473	—	<0.050	**58.8**	<0.5	<0.5	<1
MTCA Method A Cleanup Levels for Groundwater[4]				**0.5**	**0.5**	**0.8/1.0**	**5**	**1,000**	**700**	**1,000**

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CHS Auburn Site
Auburn, Washington
Farallon PN: 301-004

Well Identification	Sampled by	Sample Identification	Sample Date	Analytical Results (milligrams per liter)			Analytical Results (micrograms per liter)			
				DRO[1]	ORO[1]	GRO[2]	Benzene[3]	Toluene[3]	Ethylbenzene[3]	Total Xylenes[3]
CMW-17	Summit	CMW-17	10/16/1997	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-17	11/13/1997	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-17	12/2/1997	<0.25	**1.06**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-17	1/29/1998	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-17	3/4/1998	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-17	6/18/1998	**0.531**	**<0.75**	<0.050	1.73	<0.5	<0.5	<1
	Summit	CMW-17	9/23/1998	**0.744**	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-17	12/4/1998	**0.616**	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-17	3/23/1999	<0.25	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-17	6/14/1999	<0.25	—	<0.050	<0.5	<0.5	<0.5	<1
	ERM	CMW-17	10/7/1999	<0.25	—	<0.050	3.74	<0.5	<0.5	<1
	ERM	CMW-17	12/31/1999	<0.25	—	<0.050	<0.5	<0.5	<0.5	<1
	ERM	CMW-17	4/17/2000	ND	—	ND	ND	ND	ND	ND
	ERM	CMW-17	6/13/2000	ND	—	ND	ND	ND	ND	ND
	ERM	CMW-17	10/5/2000	**1.32**	—	ND	ND	ND	ND	1.16
	ERM	CMW-17	12/26/2000	0.33	—	ND	ND	ND	ND	ND
	ERM	CMW-17	3/30/2001	0.349	—	ND	ND	ND	ND	ND
	ERM	CMW-17	6/29/2001	0.491	—	<0.050	<0.5	<0.5	<0.5	<1
	ERM	CMW-17	9/28/2001	**0.798**	ND	ND	ND	ND	ND	ND
	ERM	CMW-17	12/17/2001	0.325	ND	ND	ND	ND	ND	ND
	ERM	CMW-17	3/6/2002	ND	ND	ND	ND	ND	ND	ND
	ERM	CMW-17	7/29/2002	**1.61**	ND	ND	ND	ND	ND	ND
	ERM	CMW-17	12/12/2002	**0.802**	ND	ND	ND	ND	ND	ND
	ERM	CMW-17	6/24/2003	ND	—	ND	ND	ND	ND	ND
	Farallon	093003-CMW17	9/30/2003	**1.19**	—	< 0.05	<0.5	<0.5	<0.5	<1
	Farallon	CMW-121703-02	12/17/2003	0.331	—	< 0.05	< 0.5	0.513	<0.5	< 1
	Farallon	CMW17-032304	3/23/2004	<0.25	—	<0.05	<0.5	<0.5	<0.5	<1
	Farallon	CMW17-062804-01	6/28/2004	<0.25	—	<0.05	<0.5	<0.5	<0.5	<1
	Farallon	CMW17-092104	9/21/2004	**0.806**	<0.5	<0.05	<0.5	<0.5	<0.5	<1
	Farallon	CMW17-122104	12/21/2004	0.341	<0.5	<0.05	<0.5	<0.5	<0.5	<1
	Farallon	CMW17-033005	3/30/2005	<0.291	**<0.581**	<0.05	<0.5	<0.5	<0.5	<1
	Farallon	CMW-17-070705	7/7/2005	<0.25	<0.5	<0.05	<0.5	<0.5	<0.5	<1
	Farallon	CMW-17-092905	9/29/2005	0.373	<0.5	<0.05	<0.5	<0.5	<0.5	<1
	Farallon	CMW-17-122705	12/27/2005	0.366	<0.5	<0.05	<0.5	<0.5	<0.5	<1
MTCA Method A Cleanup Levels for Groundwater[4]				**0.5**	**0.5**	**0.8/1.0**	**5**	**1,000**	**700**	**1,000**

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CHS Auburn Site
Auburn, Washington
Farallon PN: 301-004

Well Identification	Sampled by	Sample Identification	Sample Date	Analytical Results (milligrams per liter)			Analytical Results (micrograms per liter)			
				DRO[1]	ORO[1]	GRO[2]	Benzene[3]	Toluene[3]	Ethylbenzene[3]	Total Xylenes[3]
CMW-17	Farallon	CMW-17-032706	3/27/2006	—	—	<0.050	<0.500	<0.500	<0.500	<1.00
	Farallon	CMW-17-042106	4/21/2006	<0.245[5]	<0.490[5]	—	—	—	—	—
	Farallon	CMW-17-101806	10/18/2006	**0.629**	<0.500	<0.050	<0.500	<0.500	<0.500	<1.00
	Farallon	CMW17-031308	3/13/2008	<0.25	<0.40	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW17-061708	6/17/2008	<0.28	<0.44	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW17-100208	10/2/2008	<0.28	<0.45	<0.400	<4.0	<4.0	<4.0	<8.0
	Farallon	CMW17-123108	12/31/2008	<0.30	<0.48	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW17-032009	3/20/2009	<0.28	<0.44	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW17-012710	1/27/2010	<0.25	<0.40	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW17-042010	4/20/2010	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-17-072010	7/20/2010	<0.28	<0.44	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW17-042611	4/26/2011	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-17-071911	7/19/2011	<0.27	<0.43	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW17-102011	10/20/2011	<0.28	<0.45	<0.100	<1.0	<1.0	<1.0	<2.0
CMW-18	Summit	CMW-18	12/16/1994	—	—	<0.05	3.4	<0.5	<0.5	<1
	Summit	CMW-18	1/11/1995	—	—	<0.05	<0.5	<0.5	<0.5	<1
	Summit	CMW-18	8/25/1995	—	—	<0.050	1.1	0.88	<0.5	3.3
CMW-19	Summit	CMW-19	12/19/1994	—	—	<0.05	<0.5	<0.5	<0.5	<1
	Summit	CMW-19	1/10/1995	—	—	<0.05	<0.5	0.54	<0.5	<1
	Summit	CMW-19	2/14/1995	—	—	<0.08	<0.5	<0.5	<0.5	<1
	Summit	CMW-19	3/9/1995	<0.25	**<0.75**	<0.05	**7.7**	<0.5	<0.5	<1
	Summit	CMW-19	6/14/1995	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-19	7/12/1995	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-19	8/4/1995	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-19	9/11/1995	<0.25	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-19	10/4/1995	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-19	11/2/1995	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-19	12/15/1995	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-19	1/9/1996	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-19	2/14/1996	—	—	<0.050	0.55	<0.5	<0.5	<1
	Summit	CMW-19	3/6/1996	<0.25	**<0.75**	<0.050	0.52	<0.5	<0.5	<1
MTCA Method A Cleanup Levels for Groundwater[4]				**0.5**	**0.5**	**0.8/1.0**	**5**	**1,000**	**700**	**1,000**

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Farallon PN: 301-004

Well Identification	Sampled by	Sample Identification	Sample Date	Analytical Results (milligrams per liter)			Analytical Results (micrograms per liter)			
				DRO[1]	ORO[1]	GRO[2]	Benzene[3]	Toluene[3]	Ethylbenzene[3]	Total Xylenes[3]
CMW-19	Summit	CMW-19	4/10/1996	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-19	5/8/1996	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-19	6/5/1996	0.318	—	<0.050	4.88	<0.5	<0.5	<1
	Summit	CMW-19	7/10/1996	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-19	8/7/1996	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-19	9/12/1996	<0.25	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-19	12/4/1996	<0.25	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-19	3/5/1997	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-19	3/5/1998	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-19	3/23/1999	<0.35	—	<0.050	<0.5	<0.5	<0.5	<1
	ERM	CMW-19	4/17/2000	ND	—	ND	ND	ND	ND	ND
	ERM	CMW-19	3/30/2001	ND	—	ND	ND	ND	ND	ND
	ERM	CMW-19	3/6/2002	0.314	—	ND	ND	ND	ND	ND
	ERM	CMW-19	7/30/2002	ND	—	ND	ND	ND	ND	ND
	ERM	CMW-19	12/12/2002	ND	—	ND	ND	ND	ND	ND
	ERM	CMW-19	3/20/2003	<0.25	—	<0.050	<0.5	<0.5	<0.5	<1
	ERM	CMW-19	6/24/2003	ND	—	ND	ND	ND	ND	ND
	Farallon	CMW-121703-04	12/17/2003	<0.25	—	<0.05	<0.5	<0.5	<0.5	<1
	Farallon	CMW19-032404	3/24/2004	<0.25	—	<0.05	<0.5	<0.5	<0.5	<1
	Farallon	CMW19-062804-01	6/28/2004	<0.25	—	<0.05	<0.5	<0.5	<0.5	<1
	Farallon	CMW19-122104	12/21/2004	<0.25	<0.5	<0.05	<0.5	<0.5	<0.5	<1
	Farallon	CMW19-033105	3/31/2005	<0.25	<0.5	<0.05	<0.5	<0.5	<0.5	<1
	Farallon	CMW-19-070705	7/7/2005	<0.25	<0.5	<0.05	<0.5	<0.5	<0.5	<1
	Farallon	CMW-19-122805	12/28/2005	<0.25	<0.5	<0.05	<0.5	<0.5	<0.5	<1
	Farallon	CMW-19-032706	3/27/2006	<0.240	<0.481	<0.050	<0.500	<0.500	<0.500	<1.00
	Farallon	CMW-19-101906	10/19/2006	<0.250	<0.500	<0.050	<0.500	<0.500	<0.500	<1.00
	Farallon	CMW19-031308	3/13/2008	<0.28	<0.44	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW19-100208	10/2/2008	<0.25	<0.40	<0.100	<1.0	<1.0	<1.0	<2.0
CMW-20	Summit	CMW-20	12/19/1994	—	—	<0.05	<0.5	<0.5	<0.5	<1
	Summit	CMW-20	1/12/1995	—	—	<0.05	**37**	<0.5	<0.5	<1
	Summit	CMW-20	2/9/1995	—	—	<0.05	**41**	<0.5	<0.5	<1
MTCA Method A Cleanup Levels for Groundwater[4]				**0.5**	**0.5**	**0.8/1.0**	**5**	**1,000**	**700**	**1,000**

Table 1
Summary of Laboratory Analytical Results for TPH and BTEX in Groundwater
CHS Auburn Site
Auburn, Washington
Farallon PN: 301-004

Well Identification	Sampled by	Sample Identification	Sample Date	Analytical Results (milligrams per liter)			Analytical Results (micrograms per liter)			
				DRO[1]	ORO[1]	GRO[2]	Benzene[3]	Toluene[3]	Ethylbenzene[3]	Total Xylenes[3]
CMW-20	Summit	CMW-20	3/7/1995	0.26	**<0.75**	<0.05	**31**	<0.5	<0.5	<1
	Summit	CMW-20	6/13/1995	<0.25	**<1.5**	<0.050	**21**	<0.5	<0.5	<1
	Summit	CMW-20	9/6/1995	0.35	—	<0.050	1.2	<0.5	<0.5	<1
	Summit	CMW-20	12/15/1995	0.48	**<0.75**	<0.050	**96**	<0.5	<0.5	<1
	Summit	CMW-20	3/4/1996	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-20	6/4/1996	<0.25	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-20	3/3/1997	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-20	3/4/1998	0.299	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-20	3/23/1999	<0.25	—	<0.050	<0.5	<0.5	<0.5	<1
	ERM	CMW-20	10/7/1999	<0.25	—	<0.050	<0.5	<0.5	<0.5	<1
	ERM	CMW-20	12/31/1999	<0.25	—	<0.050	<0.5	<0.5	<0.5	<1
	ERM	CMW-20	4/17/2000	ND	—	ND	ND	ND	ND	ND
	ERM	CMW-20	6/13/2000	ND	—	ND	ND	ND	ND	ND
	ERM	CMW-20	10/5/2000	0.382	—	ND	ND	ND	ND	ND
	ERM	CMW-20	12/26/2000	ND	—	ND	ND	ND	ND	ND
	ERM	CMW-20	3/30/2001	ND	—	ND	ND	ND	ND	ND
	ERM	CMW-20	6/20/2001	<0.25	—	<0.050	<0.5	<0.5	<0.5	<1
	ERM	CMW-20	9/28/2001	ND	ND	ND	ND	ND	ND	ND
	ERM	CMW-20	12/17/2001	ND	ND	ND	ND	ND	ND	ND
	ERM	CMW-20	3/6/2002	**0.571**	—	ND	ND	ND	ND	ND
	ERM	CMW-20	7/29/2002	**1.21**	—	ND	ND	ND	ND	ND
	ERM	CMW-20	12/12/2002	**0.518**	—	ND	ND	ND	ND	ND
	ERM	CMW-20	6/24/2003	0.472	—	ND	ND	ND	ND	ND
	Farallon	093003-CMW20	9/30/2003	0.389	—	<0.05	<0.5	<0.5	<0.5	<1
	Farallon	CMW-121703-01	12/17/2003	**0.662**	—	<0.05	<0.5	0.83	<0.5	<1
	Farallon	CMW20-032304	3/23/2004	<0.25	—	<0.05	<0.5	<0.5	<0.5	<1
	Farallon	CMW20-062804-01	6/28/2004	**0.837**	—	<0.05	<0.5	<0.5	<0.5	<1
	Farallon	CMW20-092104	9/21/2004	**0.579**	<0.5	<0.05	<0.5	<0.5	<0.5	<1
	Farallon	CMW20-122104	12/21/2004	**0.579**	<0.5	<0.05	<0.5	<0.5	<0.5	<1
	Farallon	CMW20-033005	3/30/2005	0.41	<0.5	<0.05	<0.5	<0.5	<0.5	<1
	Farallon	CMW-20-070705	7/7/2005	**0.533**	<0.5	<0.05	<0.5	<0.5	<0.5	<1
MTCA Method A Cleanup Levels for Groundwater[4]				**0.5**	**0.5**	**0.8/1.0**	**5**	**1,000**	**700**	**1,000**

Table 1
Summary of Laboratory Analytical Results for TPH and BTEX in Groundwater
CHS Auburn Site
Auburn, Washington
Farallon PN: 301-004

Well Identification	Sampled by	Sample Identification	Sample Date	Analytical Results (milligrams per liter)			Analytical Results (micrograms per liter)			
				DRO[1]	ORO[1]	GRO[2]	Benzene[3]	Toluene[3]	Ethylbenzene[3]	Total Xylenes[3]
CMW-20	Farallon	CMW-20-092905	9/29/2005	0.404	<0.5	<0.05	<0.5	<0.5	<0.5	<1
	Farallon	CMW-20-122705	12/27/2005	0.438	<0.5	<0.05	<0.5	<0.5	<0.5	<1
	Farallon	CMW-20-032706	3/27/2006	<0.248	<0.495	<0.050	<0.500	<0.500	<0.500	<1.00
	Farallon	CMW-20-101806	10/18/2006	<0.250	<0.500	<0.050	<0.500	<0.500	<0.500	<1.00
	Farallon	CMW20-031308	3/13/2008	<0.25	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW20-061708	6/17/2008	<0.27	<0.43	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW20-100208	10/2/2008	<0.25	<0.40	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW20-123108	12/31/2008	<0.28	<0.44	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW20-032009	3/20/2009	<0.28	<0.44	<0.100	<1.0	<1.0	<1.0	<2.0
CMW-21	Summit	CMW-21	12/30/1994	—	—	<0.05	3.2	0.87	<0.5	2.5
	Summit	CMW-21	1/10/1995	—	—	<0.05	<0.5	<0.5	<0.5	<1
	Summit	CMW-21	2/10/1995	—	—	<0.05	<0.5	<0.5	<0.5	<1
	Summit	CMW-21	3/7/1995	<0.25	**<0.75**	<0.05	<0.5	<0.5	<0.5	<1
	Summit	CMW-21	6/13/1995	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-21	9/7/1995	0.26	—	<0.050	76	<0.5	<0.5	<1
	Summit	CMW-21	12/15/1995	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-21	3/4/1996	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-21	6/4/1996	<0.25	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-21	9/11/1996	<0.25	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-21	12/2/1996	<0.25	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-21	3/4/1997	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-21	6/23/1997	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-21	9/3/1997	0.296	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-21	12/2/1997	0.263	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-21	3/4/1998	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-21	3/23/1999	<0.25	—	<0.050	<0.5	<0.5	<0.5	<1
	ERM	CMW-21	4/17/2000	ND	—	ND	ND	ND	ND	ND
	ERM	CMW-21	3/30/2001	ND	—	ND	ND	ND	ND	ND
	ERM	CMW-21	3/6/2002	ND	—	ND	ND	ND	ND	ND
	ERM	CMW-21	7/29/2002	ND	—	ND	ND	ND	ND	ND
	ERM	CMW-21	12/12/2002	ND	—	ND	ND	ND	ND	ND
MTCA Method A Cleanup Levels for Groundwater[4]				**0.5**	**0.5**	**0.8/1.0**	**5**	**1,000**	**700**	**1,000**

Table 1
Summary of Laboratory Analytical Results for TPH and BTEX in Groundwater
CHS Auburn Site
Auburn, Washington
Farallon PN: 301-004

Well Identification	Sampled by	Sample Identification	Sample Date	Analytical Results (milligrams per liter)			Analytical Results (micrograms per liter)			
				DRO[1]	ORO[1]	GRO[2]	Benzene[3]	Toluene[3]	Ethylbenzene[3]	Total Xylenes[3]
CMW-21	ERM	CMW-21	6/24/2003	ND	—	ND	ND	ND	ND	ND
	Farallon	CMW21-032304	3/23/2004	<0.25	—	<0.05	<0.5	<0.5	<0.5	<1
	Farallon	CMW21-062804-01	6/28/2004	<0.25	—	<0.05	<0.5	<0.5	<0.5	<1
	Farallon	CMW21-033005	3/30/2005	<0.25	<0.5	<0.05	<0.5	<0.5	<0.5	<1
	Farallon	CMW-21-070705	7/7/2005	<0.25	<0.5	<0.05	<0.5	<0.5	<0.5	<1
	Farallon	CMW-21-032706	3/27/2006	<0.236	<0.472	<0.050	<0.500	<0.500	<0.500	<1.00
	Farallon	CMW-21-101806	10/18/2006	<0.250	<0.500	<0.050	<0.500	<0.500	<0.500	<1.00
	Farallon	CMW21-031308	3/13/2008	<0.26	<0.42	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW21-100208	10/2/2008	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
CMW-22	Summit	CMW-22	12/29/1994	—	—	<0.05	**170**	<0.5	<0.5	<1
	Summit	CMW-22	1/10/1995	—	—	<0.05	**30**	<0.5	<0.5	<1
	Summit	CMW-22	2/9/1995	—	—	<0.05	3.1	<0.5	<0.5	<1
	Summit	CMW-22	3/7/1995	<0.25	**<0.75**	<0.05	<0.5	<0.5	<0.5	<1
	Summit	CMW-22	6/13/1995	<0.25	**<0.75**	<0.050	**50**	<0.5	<0.5	1.2
	Summit	CMW-22	9/7/1995	0.37	—	0.130	**820**	<0.5	5.2	7.4
	Summit	CMW-22	12/15/1995	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-22	3/4/1996	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-22	6/4/1996	<0.25	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-22	9/11/1996	<0.25	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-22	12/2/1996	<0.25	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-22	3/3/1997	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-22	3/4/1998	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
CMW-23	Summit	CMW-23	12/30/1994	—	—	<0.05	4.6	<0.5	<0.5	<1
	Summit	CMW-23	1/12/1995	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-23	2/9/1995	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-23	3/7/1995	0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-23	4/5/1995	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-23	5/2/1995	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-23	6/13/1995	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-23	7/12/1995	—	—	<0.050	**5**	<0.5	<0.5	<1
	Summit	CMW-23	8/7/1995	—	—	<0.050	**220**	<2	<2	<4
MTCA Method A Cleanup Levels for Groundwater[4]				**0.5**	**0.5**	**0.8/1.0**	**5**	**1,000**	**700**	**1,000**

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Summary of Laboratory Analytical Results for TPH and BTEX in Groundwater
CHS Auburn Site
Auburn, Washington
Farallon PN: 301-004

Well Identification	Sampled by	Sample Identification	Sample Date	Analytical Results (milligrams per liter)			Analytical Results (micrograms per liter)			
				DRO[1]	ORO[1]	GRO[2]	Benzene[3]	Toluene[3]	Ethylbenzene[3]	Total Xylenes[3]
CMW-23	Summit	CMW-23	9/6/1995	<0.25	—	<0.050	**280**	<0.5	<0.5	<1
	Summit	CMW-23	10/3/1995	—	—	<0.050	**93**	<0.5	<0.5	<1
	Summit	CMW-23	11/2/1995	—	—	<0.050	3.2	<0.5	<0.5	<1
	Summit	CMW-23	12/5/1995	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-23	1/9/1996	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-23	2/13/1996	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-23	3/4/1996	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-23	4/10/1996	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-23	5/7/1996	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-23	6/4/1996	<0.25	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-23	7/9/1996	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-23	8/6/1996	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-23	9/11/1996	<0.25	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-23	10/10/1996	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-23	10/30/1996	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-23	12/2/1996	<0.25	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-23	1/8/1997	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-23	2/4/1997	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-23	3/3/1997	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-23	4/7/1997	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-23	5/8/1997	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-23	6/23/1997	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-23	7/7/1997	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-23	8/4/1997	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-23	9/3/1997	0.318	**<0.75**	<0.050	<0.5	<0.5	<0.5	1.08
	Summit	CMW-23	10/16/1997	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-23	11/13/1997	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-23	12/2/1997	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-23	1/29/1998	—	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-23	3/4/1998	0.263	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-23	6/18/1998	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
MTCA Method A Cleanup Levels for Groundwater[4]				**0.5**	**0.5**	**0.8/1.0**	**5**	**1,000**	**700**	**1,000**

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Summary of Laboratory Analytical Results for TPH and BTEX in Groundwater
CHS Auburn Site
Auburn, Washington
Farallon PN: 301-004

Well Identification	Sampled by	Sample Identification	Sample Date	Analytical Results (milligrams per liter)			Analytical Results (micrograms per liter)			
				DRO[1]	ORO[1]	GRO[2]	Benzene[3]	Toluene[3]	Ethylbenzene[3]	Total Xylenes[3]
CMW-23	Summit	CMW-23	9/23/1998	0.314	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-23	12/4/1998	0.433	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-23	3/23/1999	0.261	—	<0.050	<0.5	<0.5	<0.5	<1
	ERM	CMW-23	6/14/1999	<0.25	—	<0.050	<0.5	<0.5	<0.5	<1
	ERM	CMW-23	7/29/2002	ND	—	ND	ND	ND	ND	ND
	ERM	CMW-23	12/12/2002	**0.678**	—	ND	ND	ND	ND	ND
	ERM	CMW-23	3/19/2003	<0.25	—	<0.050	<0.5	<0.5	<0.5	<1
	ERM	CMW-23	6/24/2003	ND	—	ND	ND	ND	ND	ND
	Farallon	CMW-121703-05	12/17/2003	<0.25	—	< 0.05	< 0.5	< 0.5	< 0.5	< 1
	Farallon	CMW23-032304	3/23/2004	<0.25	—	<0.05	<0.5	<0.5	<0.5	<1
	Farallon	CMW23-122104	12/21/2004	0.253	<0.5	<0.05	<0.5	<0.5	<0.5	<1
	Farallon	CMW23-033005	3/30/2005	<0.25	<0.5	<0.05	<0.5	<0.5	<0.5	<1
	Farallon	CMW-23-070705	7/7/2005	<0.25	<0.5	<0.05	<0.5	<0.5	<0.5	<1
	Farallon	CMW-23-122805	12/28/2005	0.257	<0.5	<0.05	<0.5	<0.5	<0.5	<1
	Farallon	CMW-23-032706	3/27/2006	<0.240	<0.481	<0.050	<0.500	<0.500	<0.500	<1.00
	Farallon	CMW-23-101806	10/18/2006	<0.250	<0.500	<0.050	<0.500	<0.500	<0.500	<1.00
	Farallon	CMW23-031308	3/13/2008	<0.27	<0.43	<0.100	<1.0	<1.0	<1.0	<2.0
CMW-24	Summit	CMW-24	1/4/1995	—	—	0.088	**6.8**	<0.5	<0.5	<1
	Summit	CMW-24	1/4/1995	—	—	0.088	**6.8**	<0.5	<0.5	<1
	Summit	CMW-24	2/9/1995	—	—	0.098	2.6	<0.5	<0.5	<1
	Summit	CMW-24	3/7/1995	**0.56**	**<0.75**	<0.05	**29**	3.1	<0.5	1.1
	Summit	CMW-24	6/14/1995	**1.1**	**<0.75**	0.059	<0.5	<0.5	<0.5	<1
	Summit	CMW-24	9/7/1995	0.43	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-24	12/18/1995	**0.57**	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-24	3/5/1996	**<0.25**	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-24	6/5/1996	0.302	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-24	9/11/1996	0.477	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-24	12/3/1996	0.436	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-24	3/4/1998	0.288	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-24	3/22/1999	0.282	—	<0.050	<0.5	<0.5	<0.5	<1
	ERM	CMW-24	4/17/2000	ND	—	ND	ND	ND	ND	ND
MTCA Method A Cleanup Levels for Groundwater[4]				**0.5**	**0.5**	**0.8/1.0**	**5**	**1,000**	**700**	**1,000**

Table 1
Summary of Laboratory Analytical Results for TPH and BTEX in Groundwater
CHS Auburn Site
Auburn, Washington
Farallon PN: 301-004

Well Identification	Sampled by	Sample Identification	Sample Date	Analytical Results (milligrams per liter)			Analytical Results (micrograms per liter)			
				DRO[1]	ORO[1]	GRO[2]	Benzene[3]	Toluene[3]	Ethylbenzene[3]	Total Xylenes[3]
CMW-24	ERM	CMW-24	3/30/2001	ND	—	ND	ND	ND	ND	ND
	ERM	CMW-24	3/8/2002	0.308	—	ND	ND	ND	ND	ND
	ERM	CMW-24	3/17/2003	0.260	—	<0.050	<0.5	<0.5	<0.5	<1
	Farallon	CMW24-032404	3/24/2004	<0.25	—	<0.05	<0.5	<0.5	<0.5	<1
	Farallon	CMW24-033005	3/30/2005	<0.278	**<0.556**	<0.05	<0.5	<0.5	<0.5	<1
	Farallon	CMW-24-032706	3/27/2006	<0.240	<0.481	<0.050	<0.500	<0.500	<0.500	<1.00
	Farallon	CMW-24-101906	10/19/2006	<0.250	<0.500	<0.050	<0.500	<0.500	<0.500	<1.00
	Farallon	CMW24-031208	3/12/2008	<0.27	<0.43	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW24-061708	6/17/2008	<0.25	<0.40	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW24-100108	10/1/2008	<0.28	<0.44	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW24-123008	12/30/2008	<0.28	<0.45	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW24-031909	3/19/2009	<0.25	<0.40	<0.100	<1.0	<1.0	<1.0	<2.0
CMW-25	Summit	CMW-25	11/16/1995	—	—	**50**	**5,900**	**1,100**	**3,000**	**11,000**
	Summit	CMW-25	6/5/1996	0.560	—	**2.83**	**35.5**	2.53	106	201
	Summit	CMW-25	9/11/1996	1.610	—	**37.1**	**876**	236	**1,950**	**9,270**
	Summit	CMW-25	12/5/1996	1.30	—	**14.4**	**631**	11.5	**1,040**	**2,420**
	Summit	CMW-25	3/6/1997	0.462	**<0.75**	<0.05	<0.5	<0.5	<0.5	<1
	Summit	CMW-25	6/23/1997	0.378	**<0.75**	<0.05	1.74	<0.5	<0.5	<1
	Summit	CMW-25	9/3/1997	**1.52**	**<0.75**	**10.4**	**115**	17.8	481	**1,700**
	Summit	CMW-25	3/6/1998	**5.26**	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	CMW-25	3/25/1999	0.401	—	<0.050	<0.5	<0.5	<0.5	<1
	ERM	CMW-25	4/17/2000	0.267	—	ND	ND	ND	ND	ND
	ERM	CMW-25	3/30/2001	**1.01**	—	**9.84**	ND	ND	440	**1,020**
	ERM	CMW-25	3/8/2002	**0.949**	—	ND	ND	ND	ND	ND
	ERM	CMW-25	12/12/2002	**1.41**	—	—	—	—	—	—
	ERM	CMW-25	3/19/2003	**8.20**	—	**12.5**	<0.5	<0.5	250	870
	Farallon	CMW25-032504	3/25/2004	0.39	—	<0.05	<0.5	<0.5	0.58	1.52
	Farallon	CMW25-033105	3/31/2005	**2.45**	<0.5	**1.86**	1.53	1.14	14.7	1.41
	Farallon	CMW25-093005	9/30/2005	**0.917**	<0.5	**0.869**	0.914	<0.5	4.47	<1
	Farallon	CMW-25-032806	3/28/2006	0.367	<0.472	<0.050	<0.500	<0.500	<0.500	<1.00
	Farallon	CMW-25-101906	10/19/2006	0.353	**<0.571**	0.305 JH	0.827 JH	<0.500	<0.500	<1.00
MTCA Method A Cleanup Levels for Groundwater[4]				**0.5**	**0.5**	**0.8/1.0**	**5**	**1,000**	**700**	**1,000**

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Summary of Laboratory Analytical Results for TPH and BTEX in Groundwater
CHS Auburn Site
Auburn, Washington
Farallon PN: 301-004

Well Identification	Sampled by	Sample Identification	Sample Date	Analytical Results (milligrams per liter)			Analytical Results (micrograms per liter)			
				DRO[1]	ORO[1]	GRO[2]	Benzene[3]	Toluene[3]	Ethylbenzene[3]	Total Xylenes[3]
CMW-25	Farallon	CMW25-041007	4/10/2007	<0.250	<0.500	—	—	—	—	—
	Farallon	CMW25-031308	3/13/2008	<0.27	<0.43	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW25-061608	6/16/2008	<0.25	<0.40	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW25-100108	10/1/2008	<0.25	<0.40	<0.400	<4.0	<4.0	<4.0	<8.0
	Farallon	CMW25-123008	12/30/2008	<0.33	<0.52	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW25-031909	3/19/2009	<0.25	<0.40	0.130	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW25-102809	10/28/2009	0.29	<0.40	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW25-012610	1/26/2010	<0.25	<0.40	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW25-042010	4/20/2010	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-25-072010	7/20/2010	<0.28	<0.45	0.120	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-25-102110	10/21/2010	<0.28	<0.44	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-25-012511	1/25/2011	<0.26	<0.42	<0.100	<1.0	<1.0	<1.0	1.6
	Farallon	CMW-25-042611	4/26/2011	<0.28	<0.44	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-25-071811	7/18/2011	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW25-102111	10/21/2011	<0.28	<0.45	0.110	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-25-042712	4/27/2012	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-25-110112	11/1/2012	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-25-042213	4/22/2013	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-25-102213	10/22/2013	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
CMW-26	Farallon	CMW-26-081707	8/17/2007	<0.236	<0.472	<0.050	<0.500	<0.500	<0.500	<1.00
	Farallon	CMW26-031308	3/13/2008	<0.26	<0.42	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW26-061608	6/16/2008	<0.26	<0.42	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW26-100108	10/1/2008	<0.26	<0.42	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW26-123008	12/30/2008	<0.25	<0.40	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW26-031909	3/19/2009	<0.25	<0.40	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW26-102809	10/28/2009	<0.25	<0.40	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW26-012610	1/26/2010	<0.25	<0.40	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW26-042010	4/20/2010	<0.26	<0.42	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-26-072010	7/20/2010	<0.27	<0.44	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-26-102110	10/21/2010	<0.29	<0.47	<0.100	<1.0	<1.0	<1.0	<2.0
MTCA Method A Cleanup Levels for Groundwater[4]				**0.5**	**0.5**	**0.8/1.0**	**5**	**1,000**	**700**	**1,000**

Table 1
Summary of Laboratory Analytical Results for TPH and BTEX in Groundwater
CHS Auburn Site
Auburn, Washington
Farallon PN: 301-004

Well Identification	Sampled by	Sample Identification	Sample Date	Analytical Results (milligrams per liter)			Analytical Results (micrograms per liter)			
				DRO[1]	ORO[1]	GRO[2]	Benzene[3]	Toluene[3]	Ethylbenzene[3]	Total Xylenes[3]
CMW-26	Farallon	CMW-26-012511	1/25/2011	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-26-042611	4/26/2011	<0.28	<0.45	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-26-071811	7/18/2011	<0.28	<0.45	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-28-102011	10/20/2011	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-26-042712	4/27/2012	<0.26	<0.42	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-26-103112	10/31/2012	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-26-042213	4/22/2013	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-26-102213	10/22/2013	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
CMW-27	Farallon	CMW27-031308	3/13/2008	**1.2**[6]	<0.39	**2.600**	**40**	<1.0	220	245.5
	Farallon	CMW27-061708	6/17/2008	**1.0**	<0.40	**2.300**	**33**	<4.0	110	211
	Farallon	CMW27-061708[8]	6/17/2008	**1.1**	<0.40	**2.300**	**35**	<4.0	110	200
	Farallon	CMW27-100108	10/1/2008	**<0.75**	<0.40	**2.600**	**37**	<4.0	100	273
	Farallon	QA/QC-2-100108[8]	10/1/2008	**<0.65**	<0.40	**2.600**	**35**	<1.0	99	271
	Farallon	CMW27-123008	12/30/2008	**0.64**[9]	<0.44	**2.400**	**34**	<4.0	64	243
	Farallon	QA/QC-2-123008[8]	12/30/2008	**0.66**[9]	<0.44	**2.500**	**32**	<1.0	74	273
	Farallon	CMW27-031909	3/19/2009	<0.27	<0.43	**4.000**	**49**	<10.0	170	41.5
	Farallon	QAQC1-031909[8]	3/19/2009	<0.25	<0.40	**4.200**	**48**	<4.0	170	424
	Farallon	CMW27-102809	10/28/2009	**2.3**[9]	0.43[10]	**3.700**	**32**	1.6	180	354
	Farallon	QAQC2-102809[8]	10/28/2009	**2.6**[9]	0.50[10]	**3.900**	**32**	1.6	160	304
	Farallon	CMW27-012610	1/26/2010	**0.93**[9]	<0.41	**4.500**[7]	**25**	1.4	100	180
	Farallon	QAQC-2-012610[8]	1/26/2010	**1.0**[9]	<0.40	**4.000**[7]	**24**	1.4	100	179.7
	Farallon	CMW27-042010	4/20/2010	**2.5**[9]	<0.41	**2.300**	**28**	<4.0	84	88
	Farallon	QA/QC-2-042010[8]	4/20/2010	**3.0**[9]	<0.41	**2.400**	**26**	<4.0	87	94
	Farallon	CMW27-072110	7/21/2010	**3.8**[9]	<0.61[11]	**2.800**	**36**	<4.0	150	150
	Farallon	Dup-CMW27-072110[8]	7/21/2010	**2.2**[9]	<0.42	**2.900**	**37**	<4.0	150	150
	Farallon	CMW-27-102110	10/21/2010	**1.5**[9]	<0.43	**1.400**	**23**	<4.0	69	41
	Farallon	dup-CMW-27-102110[8]	10/21/2010	**1.4**[9]	<0.43	**1.400**	**23**	<4.0	70	42
	Farallon	CMW-27-012511	1/25/2011	**2.9**	<0.41	**4.800**	<4.0	<4.0	53	413
	Farallon	CMW-27-042611	4/26/2011	**1.1**[9]	<0.41	**2.100**	<4.0	<4.0	20	122
	Farallon	QA/QC-2-042611[8]	4/26/2011	**0.96**[9]	<0.44	**2.100**	<4.0	<4.0	21	133
	Farallon	CMW-27-071811	7/18/2011	**5.0**[9]	<0.46	**9.100**	**37**	<10	390	999
MTCA Method A Cleanup Levels for Groundwater[4]				**0.5**	**0.5**	**0.8/1.0**	**5**	**1,000**	**700**	**1,000**

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CHS Auburn Site
Auburn, Washington
Farallon PN: 301-004

Well Identification	Sampled by	Sample Identification	Sample Date	Analytical Results (milligrams per liter)			Analytical Results (micrograms per liter)			
				DRO[1]	ORO[1]	GRO[2]	Benzene[3]	Toluene[3]	Ethylbenzene[3]	Total Xylenes[3]
CMW-27	Farallon	QA/QC-1-071811[8]	7/18/2011	**4.1**[9]	<0.43	**6.300**	**25**	<10	220	550
	Farallon	CMW-27-102111	10/21/2011	**2.3**[9]	<0.41	**1.700**	**13**	<4.0	41	32
	Farallon	DUP-1-102111[8]	10/21/2011	**2.2**[9]	<0.42	**1.700**	**13**	<4.0	42	33
	Farallon	CMW-27-042712	4/27/2012	**4.4**[9]	<0.41	**5.100**[7]	<4.0	<4.0	59	355
	Farallon	QA/QC-2-042712[8]	4/27/2012	**6.9**[9]	<0.57[10]	**5.100**[7]	<4.0	<4.0	66	356
	Farallon	CMW-27-110112	11/1/2012	**2.4**[8]	<0.41	**3.300**[7]	**8.6**	<1.0	58	128.6
	Farallon	DUP2-110112[8]	11/1/2012	**3.0**[9]	<0.41	**3.400**[7]	**8.5**	<1.0	168	8.7
	Farallon	CMW-27-042313	4/23/2013	**4.0**[9]	<0.43	**1.900**	<1.0	<1.0	25	149.2
	Farallon	DUP2-042313[8]	4/23/2013	**2.9**[9]	<0.45	**1.800**	<1.0	<1.0	27	139.5
	Farallon	CMW-27-102313	10/23/2013	**2.8**[9]	<0.41	**2.200**[7]	4.3	<1.0	32	60.1
	Farallon	DUP-1-102313[8]	10/23/2013	**2.6**[9]	<0.42	**2.100**[7]	4.5	<1.0	32	61.2
CMW-28	Farallon	CMW28-031308	3/13/2008	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW28-061608	6/16/2008	**0.54**	<0.40	120[7]	<1.0	<1.0	3.0	12.1
	Farallon	CMW28-100108	10/1/2008	**0.6**[9]	<0.40	**1.900**	<4.0	<4.0	39	141
	Farallon	CMW28-123008	12/30/2008	<0.25	<0.40	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	QA/QC-1-123008[8]	12/30/2008	<0.25	<0.40	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW28-031909	3/19/2009	0.28	<0.40	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW28-102809	10/28/2009	**3.2**	**0.59**[11]	<0.100	<1.0	<1.0	<1.0	1.7
	Farallon	CMW28-012610	1/26/2010	<0.26	<0.42	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW28-042010	4/20/2010	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW28-072010	7/20/2010	<0.28	<0.45	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-28-102110	10/21/2010	<0.28	<0.45	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-28-012511	1/25/2011	<0.26	<0.42	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW28-042611	4/26/2011	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-28-071811	7/18/2011	<0.28	<0.45	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-28-102011	10/20/2011	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-28-042712	4/27/2012	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-28-110112	11/1/2012	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-28-042313	4/23/2013	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-28-102313	10/23/2013	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
MTCA Method A Cleanup Levels for Groundwater[4]				**0.5**	**0.5**	**0.8/1.0**	**5**	**1,000**	**700**	**1,000**

Table 1
Summary of Laboratory Analytical Results for TPH and BTEX in Groundwater
CHS Auburn Site
Auburn, Washington
Farallon PN: 301-004

Well Identification	Sampled by	Sample Identification	Sample Date	Analytical Results (milligrams per liter)			Analytical Results (micrograms per liter)			
				DRO[1]	ORO[1]	GRO[2]	Benzene[3]	Toluene[3]	Ethylbenzene[3]	Total Xylenes[3]
CMW-29	Farallon	CMW29-031208	3/12/2008	<0.26	<0.42	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW29-061708	6/17/2008	<0.25	<0.40	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW29-100108	10/1/2008	0.31	<0.40	<0.400	<4.0	<4.0	<4.0	<8.0
	Farallon	CMW29-123008	12/30/2008	<0.25	<0.40	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW29-031909	3/19/2009	<0.25	<0.40	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW29-102809	10/28/2009	0.44	<0.40	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW29-012710	1/27/2010	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW29-042010	4/20/2010	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-29-072010	7/20/2010	<0.27	<0.43	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-29-102110	10/21/2010	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-29-012511	1/25/2011	<0.26	<0.42	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-29-042611	4/26/2011	<0.29	<0.46	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-29-071811	7/18/2011	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-29-102011	10/20/2011	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-29-042612	4/26/2012	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-29-103112	10/31/2012	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-29-042313	4/23/2013	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-29-102213	10/22/2013	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
CMW-30	Farallon	CMW30-031208	3/12/2008	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW30-061608	6/16/2008	<0.25	<0.40	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW30-100108	10/1/2008	<0.27	<0.43	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW30-123008	12/30/2008	<0.29	<0.46	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW30-031909	3/19/2009	<0.25	<0.40	<0.100	<1.0	<1.0	<1.0	<2.0
MTCA Method A Cleanup Levels for Groundwater[4]				**0.5**	**0.5**	**0.8/1.0**	**5**	**1,000**	**700**	**1,000**

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Summary of Laboratory Analytical Results for TPH and BTEX in Groundwater
CHS Auburn Site
Auburn, Washington
Farallon PN: 301-004

Well Identification	Sampled by	Sample Identification	Sample Date	Analytical Results (milligrams per liter)			Analytical Results (micrograms per liter)			
				DRO[1]	ORO[1]	GRO[2]	Benzene[3]	Toluene[3]	Ethylbenzene[3]	Total Xylenes[3]
CMW-30	Farallon	CMW30-102809	10/28/2009	<0.25	<0.40	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW30-012610	1/26/2010	<0.25	<0.40	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW30-042010	4/20/2010	<0.27	<0.44	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-30-072010	7/20/2010	<0.27	<0.44	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-30-102110	10/21/2010	<0.30	<0.47	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-30-012511	1/25/2011	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-30-042611	4/26/2011	<0.29	<0.46	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-30-071911	7/19/2011	<0.25	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-30-102011	10/20/2011	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
CMW-31	Farallon	CMW31-031308	3/13/2008	<0.26	<0.42	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW31-061608	6/16/2008	<0.27	<0.43	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW31-100208	10/2/2008	<0.25	<0.40	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW31-123108	12/31/2008	<0.25	<0.40	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW31-032009	3/20/2009	<0.25	<0.40	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW31-102909	10/29/2009	**0.53**	<0.40	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW31-012710	1/27/2010	<0.25	<0.40	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW31-042010	4/20/2010	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-31-072010	7/20/2010	<0.27	<0.43	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-31-102210	10/22/2010	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-31-012511	1/25/2011	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW31-042611	4/26/2011	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-31-071911	7/19/2011	<0.27	<0.44	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW31-102011	10/20/2011	<0.28	<0.45	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-31-042612	4/26/2012	<0.26	<0.42	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-31-110112	11/1/2012	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-31-042213	4/22/2013	<0.26	<0.42	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-31-102213	10/22/2013	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
MTCA Method A Cleanup Levels for Groundwater[4]				**0.5**	**0.5**	**0.8/1.0**	**5**	**1,000**	**700**	**1,000**

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CHS Auburn Site
Auburn, Washington
Farallon PN: 301-004

Well Identification	Sampled by	Sample Identification	Sample Date	Analytical Results (milligrams per liter)			Analytical Results (micrograms per liter)			
				DRO[1]	ORO[1]	GRO[2]	Benzene[3]	Toluene[3]	Ethylbenzene[3]	Total Xylenes[3]
CMW-32	Farallon	CMW32-031308	3/13/2008	<0.27	<0.43	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW32-061708	6/17/2008	<0.25	<0.40	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW32-100208	10/2/2008	<0.25	<0.40	<0.400	<4.0	<4.0	<4.0	<8.0
	Farallon	CMW32-123108	12/31/2008	<0.25	<0.40	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW32-032009	3/20/2009	<0.25	<0.40	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW32-102909	10/29/2009	**0.58**	<0.4	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW32-012710	1/27/2010	<0.26	<0.42	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW32-042010	4/20/2010	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-32-072010	7/20/2010	<0.29	<0.46	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-32-102210	10/22/2010	<0.28	<0.46	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-32-012511	1/25/2011	<0.26	<0.42	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW32-042611	4/26/2011	<0.26	<0.42	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW-32-071911	7/19/2011	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	CMW32-102011	10/20/2011	<0.29	<0.46	<0.100	<1.0	<1.0	<1.0	<2.0
HMW-5	Summit	HMW-5	12/9/1994	**0.56**	—	**1.9**	**4,400**	40	140	160
	Summit	HMW-5	1/6/1995	—	—	**2.4**	**7,000**	28	320	180
HMW-6	Summit	HMW-6	1/6/1995	—	—	<0.05	**610**	0.68	1.7	1.9
	Summit	HMW-6	2/13/1995	—	—	<0.08	**1,800**	1.2	3.6	4.5
HMW-8	Summit	HMW-8	11/7/1994	—	—	<0.05	**17**	<0.5	<0.5	<1
	Summit	HMW-8	12/9/1994	0.26	—	<0.05	**73**	1.6	0.55	4.2
	Summit	HMW-8	1/6/1995	—	—	**12**	**5,100**	**3,500**	**850**	**3,700**
	Summit	HMW-8	2/13/1995	—	—	**23**	**3,500**	**2,300**	540	**2,700**
	Summit	HMW-8	3/5/1997	**5.4**	**<0.75**	**1.03**	**849**	<5	59	71.8
	Summit	HMW-8	3/5/1998	**1.53**	**<0.75**	0.664	**358**	2.7	52.5	63.3
	Summit	HMW-8	3/24/1999	**1.88**	—	**1.3**	**1,030**	54.8	88.9	235
	ERM	HMW-8	4/18/2000	ND	—	ND	0.996	ND	1.75	2.84
	ERM	HMW-8	3/30/2001	0.352	—	ND	**14.3**	ND	ND	ND
	ERM	HMW-8	3/7/2002	**1.42**	—	0.378	**81.7**	ND	21.9	15.9
	ERM	HMW-8	3/20/2003	**0.698**	—	0.326	**133**	<0.5	14.0	6.21
	Farallon	HMW-8-032404	3/24/2004	**1.06**	—	0.708	**172**	<0.5	53.2	16.2
	Farallon	HMW-8-033105	3/31/2005	<0.25	<0.5	<0.05	<0.5	<0.5	<0.5	<1
	Farallon	HMW-8-032806	3/28/2006	**2.73**	**0.590**	0.155	**51.1**	<0.500	3.75	<1.00
	Farallon	HMW-8-101806	10/18/2006	<0.250	<0.500	<0.050	<0.500	<0.500	<0.500	<1.00
MTCA Method A Cleanup Levels for Groundwater[4]				**0.5**	**0.5**	**0.8/1.0**	**5**	**1,000**	**700**	**1,000**

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Summary of Laboratory Analytical Results for TPH and BTEX in Groundwater
CHS Auburn Site
Auburn, Washington
Farallon PN: 301-004

Well Identification	Sampled by	Sample Identification	Sample Date	Analytical Results (milligrams per liter)			Analytical Results (micrograms per liter)			
				DRO[1]	ORO[1]	GRO[2]	Benzene[3]	Toluene[3]	Ethylbenzene[3]	Total Xylenes[3]
HMW-9	Summit	HMW-9	10/6/1994	0.49	—	**4.5**	**9,900**	14	480	380
	Summit	HMW-9	11/7/1994	—	—	**1.4**	**4,500**	<20	190	94
	Summit	HMW-9	12/9/1994	<0.25	—	**1.6**	**4,300**	<20	120	85
	Summit	HMW-9	1/6/1995	—	—	0.75	**6,200**	5.2	43	6.3
	Summit	HMW-9	3/8/1995	**1.1**	**1.0**	**7.5**	**6,200**	670	230	410
	Summit	HMW-9	9/6/1995	**0.90**	—	**9.7**	**9,900**	23	610	**1,300**
	Summit	HMW-9	3/5/1996	**1.50**	**<0.75**	**5.6**	**3,200**	<20	220	870
	Summit	HMW-9	6/3/1996	**1.97**	—	**5.38**	**2,640**	<25	153	741
	Summit	HMW-9	9/10/1996	**1.22**	—	**4.70**	**5,310**	12.8	51.8	559
	Summit	HMW-9	12/3/1996	**1.08**	—	**<1.00**	**948**	<10	<10	30.6
	Summit	HMW-9	3/6/1997	**2.38**	**0.777**	0.533	**800**	<5	<5	<10
	Summit	HMW-9	6/25/1997	**2.28**	**<0.75**	**1.56**	**1,190**	<5	<5	115
	Summit	HMW-9	9/5/1997	**1.91**	**<0.75**	**1.34**	**2,170**	2.6	4.3	35.3
	Summit	HMW-9	12/3/1997	**0.979**	**<0.75**	0.216	**99.6**	<0.5	<0.5	<1
	Summit	HMW-9	3/5/1998	**2.55**	**<0.75**	0.436	**199**	1.36	2.61	4.33
	Summit	HMW-9	3/24/1999	**2.97**	—	**1.16**	**120**	8.44	38.9	192
	ERM	HMW-9	4/18/2000	ND	—	0.546	**77**	ND	ND	2.65
	ERM	HMW-9	3/30/2001	**0.514**	—	0.316	**8.9**	ND	ND	ND
	ERM	HMW-9	3/7/2002	**5.82**	—	0.149	3.11	ND	ND	1.02
	ERM	HMW-9	12/13/2002	**1.06**	—	0.119	2.75	ND	ND	ND
	ERM	HMW-9	3/19/2003	**3.10**	—	0.138	3.05	<0.5	<0.5	<1
	Farallon	HMW9-032404	3/24/2004	**3.09**	—	0.12	2.04	<0.5	<0.5	<1
	Farallon	HMW9-033105	3/31/2005	**1.43**	**0.622**	0.081	2.05	<0.5	<0.5	<1
	Farallon	HMW-9-032806	3/28/2006	**1.37**	**0.560**	0.0585	<0.500	<0.500	<0.500	<1.00
	Farallon	HMW-9-101806	10/18/2006	**0.722**	<0.500	0.0883 JH	2.02 JH	<0.500	<0.500	<1.00
	Farallon	HMW9-031308	3/13/2008	<0.26	**0.63**	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	HMW9-061708	6/17/2008	<0.27	<0.44	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	HMW9-100208	10/2/2008	<0.25	<0.40	<0.400	<4.0	<4.0	<4.0	<8.0
	Farallon	HMW9-123108	12/31/2008	<0.25	<0.40	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	HMW9-031909	3/19/2009	<0.27	<0.43	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	HMW9-102909	10/29/2009	**0.62**	<0.40	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	HMW9-012610	1/26/2010	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
MTCA Method A Cleanup Levels for Groundwater[4]				**0.5**	**0.5**	**0.8/1.0**	**5**	**1,000**	**700**	**1,000**

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				DRO[1]	ORO[1]	GRO[2]	Benzene[3]	Toluene[3]	Ethylbenzene[3]	Total Xylenes[3]
HMW-9	Farallon	HMW9-042010	4/20/2010	<0.27	<0.43	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	HMW9-072010	7/20/2010	<0.28	<0.44	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	HMW-9-102210	10/22/2010	<0.28	<0.45	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	HMW-9-012511	1/25/2011	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	HMW9-042611	4/26/2011	<0.26	<0.42	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	HMW-9-071911	7/19/2011	<0.28	<0.44	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	HMW9-102011	10/20/2011	<0.28	<0.45	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	HMW-9-042612	4/26/2012	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	HMW-9-110112	11/1/2012	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	HMW-9-042313	4/23/2013	<0.26	<0.42	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	HMW-9-102313	10/23/2013	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
HMW-10	Summit	HMW-10	10/6/1994	0.38	—	**3.6**	**8,100**	16	600	260
	Summit	HMW-10	11/7/1994	—	—	**1.6**	**4,100**	<20	300	32
	Summit	HMW-10	12/9/1994	**0.51**	—	**10**	**9,800**	480	**750**	680
	Summit	HMW-10	1/6/1995	—	—	**6.2**	**8,400**	210	**570**	660
	Summit	HMW-10	3/8/1995	**0.76**	**<0.75**	**24**	**11,000**	**3,800**	**900**	**2,600**
	Summit	HMW-10	9/6/1995	**0.91**	—	**5.9**	**7,000**	<20	640	550
	Summit	HMW-10	12/3/1996	**1.95**	—	**3.95**	**2,270**	<25	217	422
	Summit	HMW-10	3/6/1997	**4.33**	**<0.75**	**5.6**	**2,430**	14.5	241	567
	Summit	HMW-10	3/5/1998	**4.09**	**<0.75**	**4.55**	**889**	10.4	52.9	359
	Summit	HMW-10	9/23/1998	**2.03**	**<0.75**	**4.55**	**1,190**	<10	10	20
	Summit	HMW-10	3/24/1999	**7.3**	—	**8.35**	**743**	40	246	**2,020**
	ERM	HMW-10	10/7/1999	**4.75**	—	**<2.5**	**1,110**	<25	<25	<40
	ERM	HMW-10	4/18/2000	**2.33**	—	**2.15**	**547**	ND	24.7	114
	ERM	HMW-10	10/5/2000	**2.24**	—	**1.26**	**398**	ND	5.17	13.3
	ERM	HMW-10	3/30/2001	**0.628**	—	**0.986**	**247**	ND	ND	ND
	ERM	HMW-10	9/28/2001	**1.60**	ND	0.786	**156**	ND	ND	ND
	ERM	HMW-10	3/7/2002	**8.98**	—	**0.974**	**63.6**	0.853	0.531	1.74
	ERM	HMW-10	3/19/2003	**5.35**	—	0.787	**40.3**	0.875	5.60	12.5
	Farallon	093003-HMW10	9/30/2003	**3.09**	—	0.584	**71.3**	0.52	<0.5	1.68
	Farallon	HMW10-032404	3/24/2004	**5.16**	—	0.655	**34.9**	1.33	2.41	25.6
	Farallon	HMW10-092104	9/21/2004	**2.12**	<0.5	0.451	**15.6**	0.518	<0.5	1.03
MTCA Method A Cleanup Levels for Groundwater[4]				**0.5**	**0.5**	**0.8/1.0**	**5**	**1,000**	**700**	**1,000**

Table 1
Summary of Laboratory Analytical Results for TPH and BTEX in Groundwater
CHS Auburn Site
Auburn, Washington
Farallon PN: 301-004

Well Identification	Sampled by	Sample Identification	Sample Date	Analytical Results (milligrams per liter)			Analytical Results (micrograms per liter)			
				DRO[1]	ORO[1]	GRO[2]	Benzene[3]	Toluene[3]	Ethylbenzene[3]	Total Xylenes[3]
HMW-10	Farallon	HMW10-033105	3/31/2005	**2.86**	<0.5	0.704	**13.3**	1.12	<0.5	3.7
	Farallon	HMW10-093005	9/30/2005	**1.89**	<0.5	0.662	**9.85**	0.614	<0.5	<1
	Farallon	HMW-10-032806	3/28/2006	**4.24**	**<0.980**	0.676	**6.90**	<0.500	<0.500	2.07
	Farallon	HMW-10-101806	10/18/2006	**1.02**	<0.500	0.313	**6.08**	<0.500	<0.500	<1.00
	Farallon	HMW10-031308	3/13/2008	<0.25	<0.40	<0.400	<4.0	<4.0	<4.0	<8.0
	Farallon	QAQC-1-031308[8]	3/13/2008	<0.26	<0.42	0.200	3.3	<1.0	<1.0	<2.0
	Farallon	HMW10-061708	6/17/2008	0.27	<0.41	<0.100	2.9	<1.0	<1.0	<2.0
	Farallon	HMW10-100208	10/2/2008	<0.28	<0.44	0.240	3.1	<1.0	<1.0	<2.0
	Farallon	HMW10-123108	12/31/2008	<0.25	<0.40	<0.400	<4.0	<4.0	<4.0	<8.0
	Farallon	HMW10-031909	3/19/2009	<0.27	<0.43	0.250	4.1	<1.0	<1.0	<1.0
	Farallon	HMW10-102909	10/29/2009	**1.1**	<0.40	0.220	2.6	<1.0	<1.0	<2.0
	Farallon	HMW10-012610	1/26/2010	<0.25	<0.40	0.210	2.3	<1.0	<1.0	<2.0
	Farallon	HMW10-042010	4/20/2010	<0.26	<0.42	0.210	2.4	<1.0	<1.0	<2.0
	Farallon	HMW10-072010	7/20/2010	<0.28	<0.44	0.240	2.3	<1.0	<1.0	<2.0
	Farallon	HMW-10-102110	10/21/2010	<0.29	<0.47	0.180	1.9	<1.0	<1.0	<2.0
	Farallon	HMW-10-012511	1/25/2011	<0.26	<0.42	<0.400	<4.0	<4.0	<4.0	<8.0
	Farallon	QA/QC-1-012511[8]	1/25/2011	<0.26	<0.41	<0.400	<4.0	<4.0	<4.0	<8.0
	Farallon	HMW10-042611	4/26/2011	<0.26	<0.41	0.180	1.6	<1.0	<1.0	<2.0
	Farallon	HMW-10-071911	7/19/2011	<0.28	<0.44	0.130	2.3	<1.0	<1.0	1.4
	Farallon	QA/QC-2-071911	7/19/2011	<0.29[10]	<0.46	0.350	2.3	<1.0	<1.0	1.8
	Farallon	HMW10-102111	10/21/2011	<0.28	<0.45	0.200	2.6	<1.0	<1.0	<2.0
	Farallon	HMW-10-042612	4/26/2012	<0.26	<0.42	0.170	1.9	<1.0	<1.0	<2.0
	Farallon	HMW-10-110112	11/1/2012	<0.26	<0.42	0.200	1.8	<1.0	<1.0	<2.0
	Farallon	HMW-10-042213	4/22/2013	<0.26	<0.42	0.150	1.7	<1.0	<1.0	<2.0
	Farallon	HMW-10-102213	10/22/2013	<0.26	<0.41	0.160	2.0	<1.0	<1.0	<2.0
MTCA Method A Cleanup Levels for Groundwater[4]				**0.5**	**0.5**	**0.8/1.0**	**5**	**1,000**	**700**	**1,000**

Table 1
Summary of Laboratory Analytical Results for TPH and BTEX in Groundwater
CHS Auburn Site
Auburn, Washington
Farallon PN: 301-004

Well Identification	Sampled by	Sample Identification	Sample Date	Analytical Results (milligrams per liter)			Analytical Results (micrograms per liter)			
				DRO[1]	ORO[1]	GRO[2]	Benzene[3]	Toluene[3]	Ethylbenzene[3]	Total Xylenes[3]
HMW-11	Summit	HMW-11	12/12/1994	**22**	—	**16**	**4,900**	400	640	**2,000**
	Summit	HMW-11	1/9/1995	—	—	**5.9**	**2,300**	370	270	840
	Summit	HMW-11	3/5/1997	**11.2**	**1.43**	**1.93**	**593**	8.92	150	287
	Summit	HMW-11	3/5/1998	**7.15**	**0.754**	**3.85**	**808**	25.3	525	633
	Summit	HMW-11	3/25/1999	**9.1**	—	**2.78**	**367**	45.4	86.2	572
	ERM	HMW-11	4/18/2000	**1.27**	—	0.72	**197**	ND	68.4	121
	ERM	HMW-11	3/30/2001	**4.16**	—	**3.18**	**1,010**	ND	271	183
	ERM	HMW-11	3/8/2002	**6.78**	—	**1.76**	**207**	3.94	126	253
	ERM	HMW-11	3/20/2003	**9.29**	—	**1.32**	**135**	1.67	73.0	82.6
	Farallon	HMW11-032404	3/24/2004	**7.68**	—	**1.13**	**50.1**	0.976	127	130
	Farallon	HMW11-033105	3/31/2005	**9.63**	**<2.0**	**2.16**	**71.4**	<2.5	185	57
	Farallon	HMW-11-032806	3/28/2006	**18.4**	**<2.40**	0.102	2.55	<0.500	0.866	1.91
	Farallon	HMW-11-101806	10/18/2006	**1.06**	<0.500	0.751	**20.2**	0.933	52.5	23.2
	Farallon	HMW11-031308	3/13/2008	<0.26	<0.42	0.540	**6.1**	<1.0	11	4.8
	Farallon	HMW11-061708	6/17/2008	**0.83**	<0.44	**0.940**	**9.0**	<4.0	14	8.3
	Farallon	HMW11-100108	10/1/2008	**0.89**[9]	<0.42	0.490	**5.7**	<1.0	1.9	1.4
	Farallon	HMW11-123108	12/31/2008	<0.25	<0.40	0.760	**8.1**	<4.0	9.2	4.4
	Farallon	HMW11-032009	3/20/2009	<0.25	<0.43	0.680	**7.5**	<4.0	8.2	5.2
	Farallon	QAQC2-032009[4]	3/20/2009	<0.27	<0.43	0.720	**7.6**	1.5	8.4	5.4
	Farallon	HMW11-102809	10/28/2009	**1.4**	<0.40	0.450	3.6	<1.0	<1.0	<2.0
	Farallon	HMW11-012610	1/26/2010	<0.26[8]	<0.41	0.460	1.4	<1.0	2.8	1.5
	Farallon	HMW11-042010	4/20/2010	**1.0**	<0.43	**1.200**	3.4	1.1	5.7	3.3
	Farallon	HMW-11-072010	7/20/2010	**<0.60**[11]	<0.46	**1.400**[7]	4.3	1.1	4.6	6.0
	Farallon	HMW-11-102110	10/21/2010	<0.50	<0.41	0.740	4.3	<1.0	1.2	2.2
	Farallon	HMW-11-012511	1/25/2011	0.30	<0.42	<0.400	<4.0	<4.0	<4.0	<8.0
	Farallon	HMW11-042711	4/27/2011	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	HMW-11-071911	7/19/2011	**0.57**	<0.42	**1.000**	3.1	<1.0	1.4	6.5
	Farallon	HMW11-102111	10/21/2011	**0.57**	<0.42	**0.860**	<4.0	<4.0	<4.0	<8.0
	Farallon	HMW-11-042612	4/26/2012	<0.25	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	HMW-11-110112	11/1/2012	**0.58**[9]	<0.41	**1.300**	3.5	<1.0	<1.0	2.6
	Farallon	HMW-11-042313	4/23/2013	<0.27	<0.43	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	HMW-11-102313	10/23/2013	**<0.54**[10]	<0.41	**0.820**	2.4	<1.0	2.1	<2.0
MTCA Method A Cleanup Levels for Groundwater[4]				**0.5**	**0.5**	**0.8/1.0**	**5**	**1,000**	**700**	**1,000**

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Summary of Laboratory Analytical Results for TPH and BTEX in Groundwater
CHS Auburn Site
Auburn, Washington
Farallon PN: 301-004

Well Identification	Sampled by	Sample Identification	Sample Date	Analytical Results (milligrams per liter)			Analytical Results (micrograms per liter)			
				DRO[1]	ORO[1]	GRO[2]	Benzene[3]	Toluene[3]	Ethylbenzene[3]	Total Xylenes[3]
HMW-12	Summit	HMW-12	10/6/1994	<0.25	—	<0.05	<0.5	<0.5	<0.5	<1
	Summit	HMW-12	12/9/1994	<0.25	—	<0.05	<0.5	<0.5	<0.5	<1
	Summit	HMW-12	1/6/1995	—	—	<0.05	<0.5	<0.5	<0.5	<1
	Summit	HMW-12	3/8/1995	<0.25	**<0.75**	<0.05	<0.5	1.2	<0.5	1.7
	Summit	HMW-12	6/14/1995	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	HMW-12	9/7/1995	<0.25	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	HMW-12	12/15/1995	0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	HMW-12	3/6/1996	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	HMW-12	6/4/1996	<0.25	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	HMW-12	3/6/1996	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	HMW-12	6/4/1996	<0.25	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	HMW-12	9/13/1996	<0.25	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	HMW-12	12/3/1996	<0.25	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	HMW-12	3/4/1997	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	HMW-12	3/4/1998	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	HMW-12	3/23/1999	<0.25	—	<0.050	<0.5	<0.5	<0.5	<1
	ERM	HMW-12	10/8/1999	<0.25	—	<0.050	<0.5	<0.5	<0.5	<1
	ERM	HMW-12	4/17/2000	ND	—	ND	ND	ND	ND	ND
	ERM	HMW-12	10/5/2000	ND	—	ND	ND	ND	0.906	ND
	ERM	HMW-12	3/30/2001	ND	—	ND	ND	ND	ND	ND
	ERM	HMW-12	9/28/2001	ND	—	ND	ND	ND	ND	ND
	ERM	HMW-12	3/7/2002	ND	—	ND	ND	ND	ND	ND
	ERM	HMW-12	3/17/2003	ND	—	ND	ND	ND	ND	ND
	Farallon	093003-HMW12	9/30/2003	<0.25	—	<0.05	<0.5	<0.5	<0.5	<1
	Farallon	HMW12-032404	3/24/2004	<0.25	—	<0.05	<0.5	<0.5	<0.5	<1
	Farallon	HMW12-092104	9/21/2004	<0.25	<0.5	<0.05	<0.5	<0.5	<0.5	<1
	Farallon	HMW12-033005	3/30/2005	<0.25	<0.5	<0.05	<0.5	<0.5	<0.5	<1
	Farallon	HMW12-093005	9/30/2005	<0.25	<0.5	<0.05	<0.5	<0.5	<0.5	<1
	Farallon	HMW-12-032806	3/28/2006	<0.236	<0.472	<0.050	<0.500	<0.500	<0.500	<1.00
	Farallon	HMW-12-101906	10/19/2006	<0.250	<0.500	<0.050	<0.500	<0.500	<0.500	<1.00
	Farallon	HMW12-031308	3/13/2008	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	HMW12-100208	10/2/2008	<0.26	<0.42	<0.100	<1.0	<1.0	<1.0	<2.0
MTCA Method A Cleanup Levels for Groundwater[4]				**0.5**	**0.5**	**0.8/1.0**	**5**	**1,000**	**700**	**1,000**

Table 1
Summary of Laboratory Analytical Results for TPH and BTEX in Groundwater
CHS Auburn Site
Auburn, Washington
Farallon PN: 301-004

Well Identification	Sampled by	Sample Identification	Sample Date	Analytical Results (milligrams per liter)			Analytical Results (micrograms per liter)			
				DRO[1]	ORO[1]	GRO[2]	Benzene[3]	Toluene[3]	Ethylbenzene[3]	Total Xylenes[3]
HMW-13	Summit	HMW-13	1/6/1995	—	—	**110**	**17,000**	**23,000**	**2,800**	**13,000**
	Summit	HMW-13	3/8/1995	**24**	**4.8**	**110**	**16,000**	**20,000**	**2,300**	**11,000**
	Summit	HMW-13	4/3/1995	—	—	**62**	**14,000**	**15,000**	**1,100**	**5,400**
	Summit	HMW-13	5/1/1995	—	—	**170**	**31,000**	**41,000**	**4,500**	**23,000**
	Summit	HMW-13	6/5/1995	**24**	**0.88**	**570**	**11,000**	**48,000**	**11,000**	**56,000**
	Summit	HMW-13	7/11/1995	—	—	**190**	**4,500**	**31,000**	**5,400**	**29,000**
	Summit	HMW-13	8/3/1995	—	—	**200**	**7,400**	**31,000**	**5,800**	**32,000**
	Summit	HMW-13	9/6/1995	**22**	—	**150**	**7,600**	**21,000**	**4,000**	**22,000**
	Summit	HMW-13	10/2/1995	—	—	**180**	**8,200**	**25,000**	**4,800**	**27,000**
	Summit	HMW-13	11/3/1995	—	—	**28**	**4,600**	**17,000**	**4,600**	**35,000**
	Summit	HMW-13	12/8/1995	**65**	**1.8**	**500**	**720**	550	480	**26,000**
	Summit	HMW-13	1/6/1996	**—**	—	**56**	**940**	**1,500**	150	**6,600**
	Summit	HMW-13	2/15/1996	**—**	—	**33**	**1,100**	**1,300**	230	**7,400**
	Summit	HMW-13	3/7/1996	**1.7**	**<0.75**	**15**	**150**	280	68	**2,700**
	Summit	HMW-13	4/10/1996	**—**	—	**45**	**420**	**2,000**	250	**6,900**
	Summit	HMW-13	5/7/1996	**—**	—	**41.1**	**389**	**2,570**	310	**10,100**
	Summit	HMW-13	6/6/1996	**19.4**	—	**33.9**	**276**	**1,680**	329	**5,210**
	Summit	HMW-13	7/11/1996	**—**	—	**111**	**483**	**5,110**	538	**15,800**
	Summit	HMW-13	8/7/1996	**—**	—	**93.1**	**220**	**4,160**	**894**	**14,600**
	Summit	HMW-13	9/12/1996	**14.5**	—	**62.3**	**147**	**1,270**	**896**	**11,500**
	Summit	HMW-13	10/11/1996	**—**	—	**69.3**	**1,190**	**1,010**	**1,050**	**13,200**
	Summit	HMW-13	10/31/1996	**—**	—	**63.1**	**916**	**1,880**	**910**	**11,300**
	Summit	HMW-13	12/5/1996	**23.0**	—	**44.0**	**94.2**	446	460	**5,630**
	Summit	HMW-13	1/8/1997	—	—	**6.7**	**23.3**	50.2	35.4	479
	Summit	HMW-13	2/4/1997	—	—	**210**	1.62	<0.5	<0.5	3.04
	Summit	HMW-13	3/6/1997	**4.26**	**<0.75**	**1.83**	**9.65**	1.98	2.13	27.9
	Summit	HMW-13	4/7/1997	—	**—**	**1.6**	**6.81**	16.7	9.57	64.8
	Summit	HMW-13	5/8/1997	—	**—**	**1.98**	**29.7**	56.2	21	120
MTCA Method A Cleanup Levels for Groundwater[4]				**0.5**	**0.5**	**0.8/1.0**	**5**	**1,000**	**700**	**1,000**

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CHS Auburn Site
Auburn, Washington
Farallon PN: 301-004

Well Identification	Sampled by	Sample Identification	Sample Date	Analytical Results (milligrams per liter)			Analytical Results (micrograms per liter)			
				DRO[1]	ORO[1]	GRO[2]	Benzene[3]	Toluene[3]	Ethylbenzene[3]	Total Xylenes[3]
HMW-13	Summit	HMW-13	6/24/1997	**7.82**	**1.11**	**4.61**	**96.8**	308	49.2	287
	Summit	HMW-13	7/7/1997	—	—	**14.3**	**148**	**1,060**	157	916
	Summit	HMW-13	8/5/1997	—	—	**24.2**	**37.6**	977	336	**1,840**
	Summit	HMW-13	9/4/1997	**4.66**	**<0.75**	**32.4**	**42.7**	336	**831**	**5,740**
	Summit	HMW-13	10/16/1997	—	—	**28.5**	**34**	149	580	**3,290**
	Summit	HMW-13	11/14/1997	—	—	**27.5**	**<125**	<125	156	718
	Summit	HMW-13	12/3/1997	**23.2**	**<0.75**	**48.5**	**<25**	<25	85.9	324
	Summit	HMW-13	1/29/1998	—	—	**2.11**	4.03	3.19	18.6	54.4
	Summit	HMW-13	3/6/1998	**28.3**	**<3.75**	**2.31**	**8.93**	9.43	16.7	40
	Summit	HMW-13	6/18/1998	**0.356**	**<3.75**	**13.1**	**13.8**	56.4	460	**1,340**
	Summit	HMW-13	9/23/1998	**5.89**	**<3.75**	**7,750**	**87.4**	362	290	843
	Summit	HMW-13	12/4/1998	**5.89**	**<3.75**	**95,700**	**465**	**7,210**	**2,730**	**14,300**
	Summit	HMW-13	3/22/1999	**6.66**	—	**1.41**	**<10**	28.4	32.1	185
	Summit	HMW-13	6/15/1999	**13.9**	—	**7.17**	**<11.2**	224	244	**1,240**
	ERM	HMW-13	10/7/1999	**25.2**	—	**7.71**	**11.3**	44.3	234	943
	ERM	HMW-13	12/31/1999	<0.25	—	**8.95**	1.25	4.73	13.2	471
	ERM	HMW-13	4/18/2000	**3.63**	—	0.94	ND	3.89	34	242
	ERM	HMW-13	6/13/2000	**1.69**	—	**1.19**	ND	ND	26.6	359
	ERM	HMW-13	10/5/2000	**5.39**	—	**5.29**	ND	48.9	119	**1,060**
	ERM	HMW-13	12/26/2000	**0.928**	—	**9.94**	ND	128	232	**2,150**
	ERM	HMW-13	3/30/2001	**5.64**	—	**12.4**	**8.11**	178	367	**2,930**
	ERM	HMW-13	6/29/2001	**5.18**	—	**18.1**	**<10.0**	103	527	**4,790**
	ERM	HMW-13	9/28/2001	**8.31**	ND	**3.57**	2.72	2.47	98.1	536
	ERM	HMW-13	12/17/2001	**21.1**	ND	**11.6**	ND	ND	55.0	**1,100**
	ERM	HMW-13	3/8/2002	**16**	—	0.281	0.539	ND	ND	2.27
	ERM	HMW-13	7/30/2002	**48.4**	—	**1.35**	2.64	1.57	5.3	16.8
	ERM	HMW-13	12/12/2002	**13.1**	—	**5.77**	2.55	2.81	36.2	391
	ERM	HMW-13	3/19/2003	**20.6**	—	0.419	<0.5	<0.5	<0.5	1.71
	ERM	HMW-13	6/25/2003	**6.33**	—	0.174	ND	ND	ND	ND
	Farallon	093003-HMW13	9/30/2003	**3.48**	—	0.379	0.995	1.58	2.9	18.10
	Farallon	CMW-121803-04	12/18/2003	**10.7**	—	**1.53**	**6.96**	1.44	6.54	111
	Farallon	HMW13-032504	3/25/2004	**2.99**	—	0.0982	1.1	<0.5	<0.5	<1
	Farallon	HWM13-062804-01	6/28/2004	**10.3**	—	0.0837	<0.5	<0.5	<0.5	2.54
MTCA Method A Cleanup Levels for Groundwater[4]				**0.5**	**0.5**	**0.8/1.0**	**5**	**1,000**	**700**	**1,000**

Table 1
Summary of Laboratory Analytical Results for TPH and BTEX in Groundwater
CHS Auburn Site
Auburn, Washington
Farallon PN: 301-004

Well Identification	Sampled by	Sample Identification	Sample Date	Analytical Results (milligrams per liter)			Analytical Results (micrograms per liter)			
				DRO[1]	ORO[1]	GRO[2]	Benzene[3]	Toluene[3]	Ethylbenzene[3]	Total Xylenes[3]
HMW-13	Farallon	HMW13-092104	9/21/2004	**4.00**	<0.5	**1.37**	1.13	1.22	6.98	103
	Farallon	HMW13-122104	12/21/2004	**11.3**	**0.642**	0.259	<0.5	<0.5	<0.5	3.46
	Farallon	HMW13-033105	3/31/2005	**5.76**	**<1**	0.136	<0.5	<0.5	<0.5	<1
	Farallon	HMW-13-070805	7/8/2005	**1.76**	<0.5	<0.05	<0.5	<0.5	<0.5	<1
	Farallon	HMW-13-093005	9/30/2005	**7.11**	<0.5	0.374	0.838	0.558	1.24	6.06
	Farallon	HMW-13-122805	12/28/2005	**13.7**	<0.5	0.822	<0.5	<0.5	<0.5	1.20
	Farallon	HMW-13-032806	3/28/2006	**2.01**	<0.481	<0.050	<0.500	<0.500	<0.500	<1.00
	Farallon	HWM-13-101906	10/19/2006	**1.09**	<0.500	0.0623 JH	0.631 JH	<0.500	<0.500	1.92 JH
	Farallon	HMW13-031308	3/13/2008	<0.27	<0.43	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	HMW13-061608	6/16/2008	<0.26	<0.42	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	HMW13-100108	10/1/2008	<0.26	<0.42	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	HMW13-123008	12/30/2008	<0.27	<0.42	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	HMW13-031909	3/19/2009	<0.25	<0.40	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	HMW13-102809	10/28/2009	**5.7**	**0.86**[11]	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	HMW13-012610	1/26/2010	<0.25	<0.40	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	HMW13-042010	4/20/2010	<0.28	<0.44	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	HMW-13-072010	7/20/2010	<0.29	<0.46	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	HMW-13-102110	10/21/2010	<0.29	<0.46	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	HMW-13-012511	1/25/2011	<0.27	<0.43	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	HMW-13-042611	4/26/2011	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	HMW-13-071811	7/18/2011	<0.28	<0.45	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	HMW-13-102111	10/21/2011	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	HMW-13-042612	4/26/2012	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	HMW-13-110112	11/1/2012	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	HMW-13-042213	4/22/2013	<0.26	<0.41	<0.100	<1.0	<1.0	<1.0	<2.0
	Farallon	HMW-13-102313	10/23/2013	<0.26	<0.42	<0.100	<1.0	<1.0	<1.0	<2.0
HMW-14	Summit	HMW-14	10/6/1994	<0.25	—	<0.05	<0.5	<0.5	<0.5	<1
	Summit	HMW-14	12/12/1994	<0.25	—	<0.05	<0.5	<0.5	<0.5	<1
	Summit	HMW-14	1/6/1995	—	—	<0.05	<0.5	<0.5	<0.5	<1
	Summit	HMW-14	3/8/1995	0.27	**<0.75**	<0.05	<0.5	<0.5	<0.5	<1
	Summit	HMW-14	9/6/1995	<0.25	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	HMW-14	6/4/1996	<0.25	—	<0.050	<0.5	<0.5	<0.5	<1
	Summit	HMW-14	12/3/1996	<0.25	—	<0.050	<0.5	<0.5	<0.5	<1
MTCA Method A Cleanup Levels for Groundwater[4]				**0.5**	**0.5**	**0.8/1.0**	**5**	**1,000**	**700**	**1,000**

Table 1
Summary of Laboratory Analytical Results for TPH and BTEX in Groundwater
CHS Auburn Site
Auburn, Washington
Farallon PN: 301-004

Well Identification	Sampled by	Sample Identification	Sample Date	Analytical Results (milligrams per liter)			Analytical Results (micrograms per liter)			
				DRO[1]	ORO[1]	GRO[2]	Benzene[3]	Toluene[3]	Ethylbenzene[3]	Total Xylenes[3]
HMW-14	Summit	HMW-14	3/4/1997	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	HMW-14	3/4/1998	<0.25	**<0.75**	<0.050	<0.5	<0.5	<0.5	<1
	Summit	HMW-14	3/22/1999	0.478	—	<0.05	<0.5	<0.5	<0.5	<1
	ERM	HMW-14	4/17/2000	ND	—	ND	ND	ND	ND	ND
	ERM	HMW-14	4/17/2000	ND	—	ND	ND	ND	ND	ND
	ERM	HMW-14	3/30/2001	ND	—	ND	ND	ND	ND	ND
	ERM	HMW-14	3/7/2002	ND	—	ND	ND	ND	ND	ND
	ERM	HMW-14	3/17/2003	<0.25	—	<0.050	<0.5	<0.5	<0.5	<1
	Farallon	HMW14-032404	3/24/2004	<0.25	—	<0.05	<0.5	<0.5	<0.5	<1
	Farallon	HMW14-033005	3/30/2005	<0.281	**<0.562**	<0.05	<0.5	<0.5	<0.5	<1
	Farallon	HMW-14-032806	3/28/2006	<0.238	<0.476	<0.050	<0.500	<0.500	<0.500	<1.00
	Farallon	HMW14-031208	3/12/2008	<0.25	<0.40	<0.100	<1.0	<1.0	<1.0	<2.0
MTCA Method A Cleanup Levels for Groundwater[4]				**0.5**	**0.5**	**0.8/1.0**	**5**	**1,000**	**700**	**1,000**

NOTES:

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

— denotes sample not analyzed

ND denotes analyte not detected at or above the laboratory reporting limit which was not provided in summary table

Results in **BOLD** denote sample results or reporting limit exceeds applicable Washington State Model Toxics Control Act Cleanup Regulation (MTCA) Method A Cleanup Levels for Groundwater.

[1]Analyzed by Northwest Method NWTPH-Dx.

[2]Analyzed by Northwest Method NWTPH-Gx.

[3]Analyzed by U. S. Environmental Protection Agency Method 8021B.

[4]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.

[5]Well was resampled due to laboratory quality control issues with the original samples collected during the March 2006 sampling event.

[6]Hydrocarbons in the lube oil range are impacting the diesel range organics result.

[7]Hydrocarbons indicative of heaver fuels are present in the sample and are impacting the gasoline result.

[8]Quality assurance/quality control duplicate sample.

[9]Hydrocarbons in the gasoline range are impacting the diesel-range result

[10]The practical quantitation limit is elevated due to interferences in the sample.

[11]Hydrocarbons in the diesel range are impacting the oil-range result.

BTEX = benzene, toluene, ethylbenzene, and xylenes

DRO = total petroleum hydrocrabons (TPH) as diesel-range organics

ERM = Environmental Resources Management

Farallon = Farallon Consulting, L.L.C.

GRO = TPH as gasoline-range organics

JH = Estimated value. Sample result biased high due to associated quality control data exceeding laboratory-established control limits.

JL = Estimated value. Sample result biased low due to associated quality control data below laboratory-established control limits.

ORO = TPH as oil-range organics

Summit = Summit Envirosolutions

TPH = total petroleum hydrocarbons

Table 2
Applicable or Relevant and Appropriate Requirements
CHS Auburn Site
Auburn, Washington
Farallon PN: 301-004

Applicable or Relevant and Appropriate Requirement	Source	Description and Relevance
Washington State Model Toxics Control Act Statute and Cleanup Regulation	Chapter 70.105D RCW and WAC 173-340	Establish cleanup standards and requirements for the cleanup of hazardous waste sites in the State of Washington
Occupational Safety and Health Act	29 CFR	Provides federal standards for worker safety and health. The Hazardous Waste Operations and Emergency Response Standard (29 CFR Subpart 1910.120) specifically applies to workers at hazardous waste cleanup operations and treatment, storage and disposal facilities.
Washington Industrial Safety and Health Act	WAC 296-62 and WAC 296-863	Provides state rules and standards for occupational health and safety. WAC 296-843 provides core rules for hazardous waste operations including accident prevention programs, first aid, personal protective equipment, and chemical hazard communication. Applies to Site workers conducting investigation, monitoring, or cleanup activities.
Washington State Hazardous Waste Management Act and State Dangerous Waste Regulation	Chapter 70.105 RCW and WAC 173-303	Provides requirements for designation, handling, and disposal of hazardous and/or dangerous wastes. Applies to wastes generated at the Site.
Minimum Standards for Construction and Maintenance of Wells	WAC 173-160	Establishes minimum standards for the construction and decommissioning of all wells in the state of Washington. Applies to installation and decommissioning of Site monitoring and treatment system wells or injection points.
Land Clearing, Filling, and Grading Permit	Auburn City Code 15.74	May be required for any trenching activities for connections of treatment system piping.
Right-of-Way Permit	Auburn City Code 12.60	May be required for work within the city of Auburn rights-of-way.
Water Pollution Control Act and State Water Quality Standards	Chapter 90.48 RCW and WAC 173-200	Provide standards to protect existing and future beneficial uses of groundwater through the reduction or elimination of discharge of contaminants to groundwater. These rules and standards may apply to underground injection of chemicals for the purpose of treating groundwater.

Table 2
Applicable or Relevant and Appropriate Requirements
CHS Auburn Site
Auburn, Washington
Farallon PN: 301-004

Applicable or Relevant and Appropriate Requirement	Source	Description and Relevance
Underground Injection Control Program	WAC 173-218	Provides state standards for protection of groundwater quality by regulating the discharge of fluids in Underground Injection Control (UIC) wells. This would apply if in situ chemical oxidation or bioaugmentation were conducted by subsurface injection of chemical reagents at the Site. The UIC program satisfies the intent and requirements of Part C of the Safe Drinking Water Act, Protection of Underground Sources of Drinking Water and the Washington State Water Pollution Control Act (Chapter 90.48 RCW).
Puget Sound Clean Air Agency Regulations	Puget Sound Clean Air Agency Regulations	Regulate the emission of air contaminants within King, Pierce, Snohomish, and Kitsap Counties. These would apply to emission of effluent vapors from certain potential treatment operations such as soil vapor extraction, if selected as a component of a cleanup remedy for the Site. The regulation are intended to carry out the purposes and requirements of the Washington State Clean Air Act (Chapter 70.94 RCW) and federal Clean Air Act (Title 42 United States Code Chapter 85.
State Environmental Policy Act	43.21C RCW	Provides the framework for regulatory agencies to consider the consequences of an environmental proposal before taking action. This may apply during the permitting and design phases of the cleanup.

NOTES:

CFR = Code of Federal Regulations

RCW = Revised Code of Washington

WAC = Washington Administrative Code

Table 3
Detailed Evaluation of Cleanup Action Alternatives--Groundwater
CHS Auburn Site
Auburn, Washington
Farallon PN: 301-004

Cleanup Alternative	Groundwater Cleanup Action Alternative 1 Monitored Natural Attenuation		Groundwater Cleanup Action Alternative 2 Enhanced Air Sparging with Targeted Soil Vapor Extraction		Groundwater Cleanup Action Alternative 3 Chemical Oxidation and Enhanced Bioremediation	
Description of Cleanup Alternative	Natural attenuation of contaminants in groundwater with long-term monitoring		Treatment of contaminated groundwater using air sparging and soil vapor extraction in area down-gradient of current Central Treatment System		Treatment of contaminated groundwater using a chemical oxidant and oxygen releasing compound	
Overall MTCA Benefit Score[1]	**7.0**		**8.5**		**7.3**	
MTCA Threshold Requirements						
Protection of Human Health and the Environment	Alternative will protect human health and the environment.		Alternative will protect human health and the environment.		Alternative will protect human health and the environment.	
Compliance with Cleanup Standards	Contamination would remain until attenuated naturally.		Active alternative will result in compliance with cleanup standards.		Active alternative will result in compliance with cleanup standards.	
Compliance with Applicable State and Federal Laws	Contamination will remain above chemical-specific applicable laws until attenuated naturally. Alternative will be implemented in compliance with applicable federal, state, and local laws.		Alternative complies with applicable laws.		Alternative complies with applicable laws.	
Provision for Compliance Monitoring	Alternative includes provisions for compliance monitoring (i.e., groundwater monitoring).		Alternative includes provisions for compliance monitoring (i.e., groundwater monitoring).		Alternative includes provisions for compliance monitoring (i.e., groundwater monitoring).	
Other MTCA Requirements						
Permanent to the Maximum Extent Practicable	Alternative is permanent to the maximum extent practicable.		Alternative is permanent to the maximum extent practicable.		Alternative is permanent to the maximum extent practicable.	
Restoration Time Frame	Restoration time frame is undefined and may exceed 10 years.		Restoration time frame is 2 to 5 years for design, implementation and monitoring.		Restoration time frame is 2 to 5 years for design, implementation and monitoring.	
Evaluation Criteria for Permanence to the Maximum Extent Practicable						
Protectiveness (30% Weighted Factor)	Alternative will achieve overall protection, longest restoration timeframe.	**6**	Alternative will achieve overall protection.	**9**	Alternative will achieve overall protection.	**9**
Permanence (20% Weighted Factor)	Natural attenuation of petroleum hydrocarbons is a permament process but degradation rates will be low due to anaerobic conditions.	**8**	Alternative makes greater use of permanent contaminant destruction.	**9**	Alternative makes use of permanent contaminant destruction, possibility of creation of secondary contaminants by chemical reaction.	**7**
Long-Term Effectiveness (20% Weighted Factor)	Effectiveness limited by anaerobic conditions that will limit degradation rate.	**4**	Permanently effective in the long-term.	**9**	Some uncertainty at effectiveness due to hydrogeologic conditions (i.e. high groundwater velocity) at Site.	**7**
Short-Term Risk Management (10% Weighted Factor)	Alternative does not present short-term risks.	**10**	Alternative includes short-term risks associated with field work at an operating business, treatment well installation, excavation for piping, and proximity of major arterial road.	**7**	Alternative includes short-term risks associated with field work at an operating business, injection well installation, handling and injection of chemical oxidants, and proximity to a major arterial road.	**6**
Implementability (10% Weighted Factor)	The natural attenuation monitoring would be conducted in accordance with Ecology guidance for natural attenuation studies.	**10**	Readily available technology, may require angle boring to access area beneath Auburn Way south. Treatment well and piping installation will disrupt business activities at construction areas.	**8**	Readily available technology, would require pilot testing to determine optimal reagent, concentrations, and injection parameters. Injection activities will disrupt business activities at construction areas.	**6**
Public Concerns (10% Weighted Factor)	Alternative results in long-term presence of contaminated groundwater.	**8**	Alternative includes Site work including short-term blocking business access and traffic interruption.	**7**	Alternative includes Site work including short-term blocking of business access, handling and distribution of chemical oxidant, and traffic interruption.	**6**
Cost	**$715,100**		**$604,800**		**$689,200**	

NOTES:

[1] Basis for overall Washington State Model Toxics Control Act Cleanup Regulation (MTCA) Benefit Score provided in text above and quantitatively with a "score" from 0 (least favorable) to 10 (most favorable) for each of the six evaluation criteria for permanence to the Maximum Extent Practicable. MTCA Benefit Scores are calculated by summing mathematical product of the score multiplied by the weighting factor for each of the six criteria.

Table 4
Estimated Costs for Cleanup Action Alternatives--Groundwater
CHS Auburn Site
Auburn, Washington
Farallon PN: 301-004

Groundwater Cleanup Action Alternative 1 Monitored Natural Attenuation	
Task	**Cost**
Task A - Project Management	$138,000
Task B - Groundwater Monitoring (20 years)	$315,800
Task C - Reporting	$171,700
Task D - Well Decommissioning	$89,600
Total	**$715,100**

Groundwater Cleanup Action Alternative 2 Enhanced Air Sparging with Targeted Soil Vapor Extraction	
Task	**Cost**
Task A - Project Management	$34,500
Task B - Cleanup Action Plan Development and Engineering Design	$27,200
Task C - Air Sparging and Soil Vapor Extraction Well Installation	$80,500
Task D - Construction	$84,800
Task E - Operation and Maintenance	$34,400
Task F - Groundwater Monitoring (5 years)	$158,000
Task G - Reporting	$85,800
Task H - Well Decommissioning	$99,600
Total	**$604,800**

Groundwater Cleanup Action Alternative 3 Chemical Oxidation and Enhanced Bioremediation	
Task	**Cost**
Task A - Project Management	$34,500
Task B - Bench Testing	$5,700
Task C - Cleanup Action Plan Development and Engineering Design	$22,000
Task D - Injection Well Installation	$123,000
Task E - In-Situ Chemical Oxidant Injection	$140,600
Task F - Groundwater Monitoring (5 years)	$158,000
Task G - Reporting	$85,800
Task H - Well Decommissioning	$119,600
Total	**$689,200**

Table 5
Detailed Evaluation of Cleanup Action Alternatives--Soil
CHS Auburn Site
Auburn, Washington
Farallon PN: 301-004

Cleanup Alternative	Soil Cleanup Action Alternative 1 Institutional Controls		Soil Cleanup Action Alternative 2 Excavation and Off-Site Disposal	
Description of Cleanup Alternative	Maintain impermeable surface and implement Environmental Covenant for the Property.		Excavation of contaminated soil located above 15 feet below ground surface and off-Site disposal of waste material	
Overall MTCA Benefit Score[1]	**7.3**		**7.8**	
MTCA Threshold Requirements				
Protection of Human Health and the Environment	Alternative will protect human health and the environment.		Alternative will protect human health and the environment.	
Compliance with Cleanup Standards	Contamination would remain until attenuated naturally.		Active alternative will result in compliance with cleanup standards.	
Compliance with Applicable State and Federal Laws	Contamination will remain in excess of chemical-specific applicable laws until attenuated naturally. Alternative will be implemented in compliance with applicable federal, state, and local laws.		Alternative complies with applicable laws.	
Provision for Compliance Monitoring	Alternative includes provisions for compliance monitoring (i.e., groundwater monitoring during implementation of the selected groundwater cleanup action).		Alternative includes provisions for compliance monitoring (i.e., confirmation soil sampling and groundwater sampling during implementation of the selected groundwater cleanup action).	
Other MTCA Requirements				
Permanent to the Maximum Extent Practicable	Alternative 1 is less permanent than Alternative 2 due to residual soil exceeding cleanup levels.		Alternative is permanent to the maximum extent practicable.	
Restoration Time Frame	Restoration time frame is undefined and may exceed 10 years.		Restoration time frame is 1 year for design and implementation.	
Evaluation Criteria for Permanence to the Maximum Extent Practicable				
Protectiveness (30% Weighted Factor)	Alternative will achieve overall protection through implementation of an environmental covenant restricting soil use and handling .	**7**	Alternative will achieve overall protection.	**9**
Permanence (20% Weighted Factor)	Requires restrictions on soil use until cleanup standards are achieved.	**6**	Alternative removes contaminated media from the Site and transfers the contaminated media to disposal facility.	**7**
Long-Term Effectiveness (20% Weighted Factor)	Effective as long as property deed precludes use of soil.	**7**	Permanently effective in the long-term if contaminated soils can be accessed.	**8**
Short-Term Risk Management (10% Weighted Factor)	Alternative does not pose short-term risks.	**10**	Alternative includes short-term risks associated with excavation, shoring requirements, proximity to buried utilities, and transport of contaminated media.	**6**
Implementability (10% Weighted Factor)	Subsurface access restrictions will be implemented permanently.	**8**	Structural shoring is likely necessary to protect above- and below-ground utilities, The CHS store structure, and C Street Southeast roadway.	**8**
Public Concerns (10% Weighted Factor)	Alternative results in long-term presence of contaminated soil.	**8**	Alternative includes Site work including blocking business access and traffic interruption.	**7**
Cost	**$40,900**		**$650,900**	

NOTES:

[1] Basis for overall Washington State Model Toxics Control Act Cleanup Regulation (MTCA) Benefit Score provided in text above and quantitatively with a "score" from 0 (least favorable) to 10 (most favorable) for each of the six evaluation criteria for permanence to the Maximum Extent Practicable. MTCA Benefit Scores are calculated by summing mathematical product of the score multiplied by the weighting facto for each of the six criteria.

Table 6
Estimated Costs for Cleanup Action Alternatives--Soil
CHS Auburn Site
Auburn, Washington
Farallon PN: 301-004

Soil Cleanup Action Alternative 1 Institutional Controls	
Task	**Cost**
Task A - Project Management	$6,900
Task B - Soil Investigation	$20,100
Task C - Technical Support for Environmental Covenant Execution	$9,400
Task H - Reporting	$4,500
Total	**$40,900**

Soil Cleanup Action Alternative 2 Excavation and Off-Site Disposal	
Task	**Cost**
Task A - Project Management	$24,900
Task B - Soil Investigation	$20,100
Task C - Permitting	$18,100
Task D - Cleanup Action Plan Development and Engineering Design	$35,700
Task E - Construction Management	$34,700
Task F - Construction	$491,700
Task G - Soil Sampling and Analysis	$8,900
Task H - Reporting	$16,800
Total	**$650,900**