

**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 <sup>1</sup>	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	<b>\$40,900</b>	<b>\$650,900</b>		

**NOTES:**

<sup>1</sup> 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.