

March 7, 2018

Mr. Michael Warfel
Toxics Cleanup Program
Washington State Department of Ecology
Northwest Regional Office
3190 160th Avenue Southeast
Bellevue, Washington 98008-5452

BY MAIL AND EMAIL

**RE: REQUEST FOR WRITTEN OPINION
FOCUSED FEASIBILITY STUDY AND DISPROPORTIONATE COST ANALYSIS
OLD STONEWAY RENTON PROPERTY
1915 SOUTHEAST MAPLE VALLEY HIGHWAY, RENTON, WASHINGTON
VCP PROJECT NO. NW1702
FARALLON PN: 266-008**

Dear Mr. Warfel:

Farallon Consulting, L.L.C. (Farallon) has prepared this letter on behalf of Maple Valley, LLC to request a written opinion from the Washington State Department of Ecology (Ecology) confirming that the selected permanent cleanup action for the Old Stoneway Renton property at 1915 Southeast Maple Valley Highway in Renton, Washington (herein referred to as the Site) under the Ecology Voluntary Cleanup Program (VCP) meets the substantive requirements of the Washington State Model Toxics Control Act Cleanup Regulation (MTCA), Chapter 173-340 of the Washington Administrative Code. An updated Focused Feasibility Study and Disproportionate Cost Analysis to support the selected permanent cleanup action at the Site is described in the *Focused Feasibility Study and Disproportionate Cost Analysis, Old Stoneway Renton Property, 1915 Southeast Maple Valley Highway, Renton, Washington* dated March 7, 2018, prepared by Farallon (Attachment A). A VCP Request for Opinion Form is provided in Attachment B.

A comprehensive remedial investigation (RI) has been completed at the Site by others. During the RI, the following compounds were identified as constituents of concern (COCs) for the Site:

- Total petroleum hydrocarbons as diesel-range organics, as oil-range organics, and as gasoline-range organics in soil;
- Formaldehyde in soil and groundwater; and
- Arsenic in groundwater.

A cleanup action approved by Ecology was implemented at the Site in 2007 to address COC-affected media, which included multiple phases of soil remediation, including source removal excavations. In addition, a groundwater compliance monitoring program was implemented to demonstrate monitored natural attenuation of COCs at the Site. Following completion of the



interim action soil remediation activities in 2010, the only COC remaining at concentrations exceeding the MTCA cleanup level at the Site was arsenic in groundwater. Concentrations of arsenic exceeding the MTCA Method A cleanup level for groundwater generally correlated with a localized area of soil with residual elevated pH that was left in-place during interim action activities due to the proximity of the area to the Cedar River. Concentrations of arsenic exceeding the MTCA Method A cleanup level in groundwater have been attributed to the increased solubility of naturally occurring arsenic as a result of elevated pH in soil and groundwater in a localized area on the Site.

Maple Valley, LLC has selected a permanent and final cleanup alternative for the Site that will be implemented in conjunction with planned redevelopment of the Site. The selected permanent cleanup action will include institutional controls to prohibit the use of groundwater at the Site and prohibit the disturbance of soil in a localized area at the Site.

The selected permanent cleanup action will protect human health and the environment by eliminating risks posed by the COCs remaining in a localized area of the Site. Therefore, Farallon requests a No Further Action determination from Ecology for the Site upon implementation of the selected permanent cleanup action.

Please contact either of the undersigned at (425) 295-0800 if you have questions or need additional information.

Sincerely,

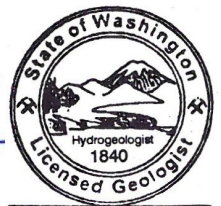
Farallon Consulting, L.L.C.

Pete Kingston, L.G.
Associate Geologist



PETER J. KINGSTON

J. Riley Conkin, L.G., L.H.G.
Principal Geologist



John Riley Conkin

Attachments: Attachment A, Focused Feasibility Study and Disproportionate Cost Analysis
Attachment B, Request for Opinion Form

cc: Ms. Sonia Fernandez, Ecology (by email only)
Mr. Jimmy Blais, Maple Valley, LLC (by email only)

PK/JRC:mm

ATTACHMENT A
FOCUSED FEASIBILITY STUDY AND DISPROPORTIONATE COST
ANALYSIS

REQUEST FOR WRITTEN OPINION
Focused Feasibility Study and Disproportionate Cost Analysis
Old Stoneway Renton Property
1915 Southeast Maple Valley Highway
Renton, Washington

Farallon PN: 266-008

**FOCUSED FEASIBILITY STUDY AND DISPROPORTIONATE COST
ANALYSIS**

**OLD STONEWAY RENTON PROPERTY
1915 SOUTHEAST MAPLE VALLEY HIGHWAY
RENTON, WASHINGTON
VCP PROJECT NO. NW1702**

**Submitted by:
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975 5th Avenue Northwest
Issaquah, Washington 98027**

Farallon PN: 266-008

**For:
Maple Valley, LLC
9125 10th Avenue South
Seattle, Washington 98108**

March 7, 2018

Prepared by:



Peter Kingston, L.G.
Associate Geologist



Reviewed by:



J. Riley Conkin, L.G., L.H.G.
Principal Geologist

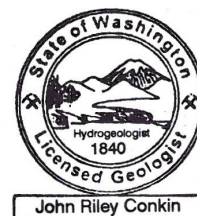




TABLE OF CONTENTS

| | |
|--|------------|
| ACRONYMS AND ABBREVIATIONS..... | iii |
| 1.0 INTRODUCTION..... | 1-1 |
| 1.1 PURPOSE AND OBJECTIVES..... | 1-2 |
| 1.2 ORGANIZATION..... | 1-2 |
| 2.0 SITE DESCRIPTION AND BACKGROUND..... | 2-1 |
| 2.1 PROPERTY DESCRIPTION..... | 2-1 |
| 2.2 GEOLOGY AND HYDROGEOLOGY..... | 2-1 |
| 2.3 PREVIOUS INVESTIGATIONS AND INTERIM ACTIONS..... | 2-2 |
| 2.3.1 Remedial Investigation..... | 2-2 |
| 2.3.2 Interim Actions..... | 2-2 |
| 2.3.1 Compliance Groundwater Monitoring Program..... | 2-4 |
| 2.3.2 Soil Gas Survey..... | 2-5 |
| 3.0 CONCEPTUAL SITE MODEL..... | 3-1 |
| 3.1 APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS..... | 3-1 |
| 3.2 CLEANUP ACTION OBJECTIVES..... | 3-2 |
| 3.3 CONSTITUENTS OF CONCERN..... | 3-2 |
| 3.4 MEDIUM OF CONCERN..... | 3-2 |
| 3.5 TERRESTRIAL ECOLOGICAL EVALUATION..... | 3-3 |
| 3.6 CLEANUP STANDARDS..... | 3-3 |
| 3.6.1 Groundwater Cleanup Levels..... | 3-3 |
| 3.6.2 Point of Compliance..... | 3-3 |
| 3.7 FORMALDEHYDE..... | 3-4 |
| 4.0 FOCUSED FEASIBILITY STUDY..... | 4-1 |
| 4.1 EVALUATION OF FEASIBLE CLEANUP TECHNOLOGIES..... | 4-1 |
| 4.2 EVALUATION OF POTENTIALLY FEASIBLE CLEANUP ACTION ALTERNATIVES..... | 4-2 |
| 4.3 EVALUATION PROCESS..... | 4-2 |
| 4.4 POTENTIAL CLEANUP ACTION ALTERNATIVES..... | 4-4 |
| 4.5 DISPROPORTIONATE COST ANALYSIS..... | 4-5 |
| 4.6 RECOMMENDED PERMANENT CLEANUP ACTION ALTERNATIVE..... | 4-5 |
| 4.6.1 Protection of Human Health and the Environment..... | 4-5 |
| 4.6.2 Compliance with Cleanup Standards..... | 4-5 |
| 4.6.3 Compliance with Applicable State and Federal Laws..... | 4-6 |
| 4.6.4 Provision for Compliance Monitoring..... | 4-6 |
| 4.6.5 Permanence..... | 4-6 |
| 4.6.6 Reduction of Toxicity, Mobility, and Volume of Contaminants..... | 4-6 |
| 4.6.7 Short-Term Risks..... | 4-6 |



| | | |
|------------|---|------------|
| 4.6.8 | Implementability | 4-6 |
| 4.6.9 | Restoration Time Frame | 4-6 |
| 5.0 | COMPLIANCE GROUNDWATER MONITORING PLAN | 5-1 |
| 6.0 | OPERATIONS AND MAINTENANCE PLAN..... | 6-1 |
| 7.0 | CONCLUSIONS AND REQUEST FOR NFA DETERMINATION..... | 7-1 |
| 8.0 | REFERENCES..... | 8-1 |
| 9.0 | LIMITATIONS..... | 9-1 |
| 9.1 | GENERAL LIMITATIONS | 9-1 |
| 9.2 | LIMITATION ON RELIANCE BY THIRD PARTIES | 9-1 |

FIGURES

| | |
|----------|--|
| Figure 1 | <i>Site Vicinity Map</i> |
| Figure 2 | <i>Historical Features</i> |
| Figure 3 | <i>Interim Action Site Plan</i> |
| Figure 4 | <i>Cross-Section A-A'</i> |
| Figure 5 | <i>Groundwater Elevation Contours and Flow Direction for July 20, 2017</i> |
| Figure 6 | <i>Groundwater Analytical Results</i> |

TABLES

| | |
|---------|--|
| Table 1 | <i>Summary of Groundwater Elevation Data</i> |
| Table 2 | <i>Summary of Groundwater Analytical Results</i> |
| Table 3 | <i>Remediation Technology Screening</i> |
| Table 4 | <i>Evaluation of Cleanup Action Alternatives</i> |

CHART

| | |
|---------|--|
| Chart 1 | <i>Disproportionate Cost Analysis Rankings</i> |
|---------|--|

APPENDICES

| | |
|------------|---|
| Appendix A | Laboratory Analytical Reports, 2016 – 2017 |
| Appendix B | Terrestrial Ecological Evaluation Form |
| Appendix C | Preliminary Redevelopment Site Plan |
| Appendix D | Draft Environmental Covenant and Supporting Documentation |



ACRONYMS AND ABBREVIATIONS

| | |
|----------------------------------|--|
| ARARs | applicable or relevant and appropriate requirements |
| bgs | below ground surface |
| COCs | constituents of concern |
| DCA | Disproportionate Cost Analysis |
| DRO | total petroleum hydrocarbons as diesel-range organics |
| Ecology | Washington State Department of Ecology |
| EPA | U.S. Environmental Protection Agency |
| EPI | Environmental Partners, Inc. |
| Farallon | Farallon Consulting, L.L.C. |
| FFS | Focused Feasibility Study |
| GRO | total petroleum hydrocarbons as gasoline-range organics |
| µg/l | micrograms per liter |
| µg/m ³ | micrograms per cubic meter |
| mg/kg | milligrams per kilogram |
| MNA | monitored natural attenuation |
| msl | mean sea level |
| MTCA | Washington State Model Toxics Control Act Cleanup Regulation |
| NFA | No Further Action |
| OnSite | OnSite Environmental Inc. of Redmond, Washington |
| ORO | total petroleum hydrocarbons as oil-range organics |
| Phase I ESA | Phase I Environmental Site Assessment |
| PQL | practical quantitation limit |
| Revised Interim Action Report | <i>Interim Action Report Volume 1, Former Stoneway Batch Plant, 1915 SE Maple Valley Highway, Renton, Washington</i> dated October 12, 2011, prepared by Environmental Partners, Inc. |
| RI | remedial investigation |
| Site | the Old Stoneway Renton property at 1915 Southeast Maple Valley Highway in Renton, Washington |
| TEE | terrestrial ecological evaluation |



VCP
WAC

Voluntary Cleanup Program
Washington Administrative Code



1.0 INTRODUCTION

Farallon Consulting, L.L.C. (Farallon) has prepared this Focused Feasibility Study (FFS) and Disproportionate Cost Analysis (DCA) on behalf of Maple Valley, LLC to provide the Washington State Department of Ecology (Ecology) an updated FFS and DCA to support the selected permanent cleanup action for the Old Stoneway Renton property at 1915 Southeast Maple Valley Highway in Renton, Washington (herein referred to as the Site) (Figure 1). This FFS and DCA were prepared 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 selected cleanup alternative will be conducted in accordance with MTCA as an independent remedial action under the Ecology Voluntary Cleanup Program (VCP). The Site is identified by Ecology as Stoneway Concrete Renton (AKA Former Stoneway Concrete Batch Plant) VCP Project No. NW1702.

A comprehensive remedial investigation (RI) has been completed at the Site by others. During the RI, the following compounds were identified as constituents of concern (COCs) for the Site:

- Total petroleum hydrocarbons as diesel-range organics (DRO), as oil-range organics (ORO), and as gasoline-range organics (GRO) in soil;
- Formaldehyde in soil and groundwater; and
- Arsenic in groundwater.

A cleanup action approved by Ecology was implemented at the Site in 2007 to address COC-affected media, which included multiple phases of soil remediation, including source removal excavations. In addition, a groundwater compliance monitoring program was implemented to demonstrate monitored natural attenuation (MNA) of COCs at the Site. Following completion of the interim action soil remediation activities in 2010, the only COC remaining at concentrations exceeding the MTCA cleanup level at the Site was arsenic in groundwater. Concentrations of arsenic exceeding the MTCA Method A cleanup level for groundwater generally correlated with a localized area of soil with residual elevated pH that was left in-place during interim action activities due to the proximity of the area to the Cedar River. Concentrations of arsenic exceeding the MTCA Method A cleanup level in groundwater have been attributed to the increased solubility of naturally occurring arsenic as a result of elevated pH in soil and groundwater in the localized area.

Maple Valley, LLC has selected a permanent and final cleanup alternative for the Site that will be implemented in conjunction with planned redevelopment of the Site. The selected permanent cleanup action will include institutional controls to prohibit the use of groundwater at the Site and prohibit the disturbance of soil in a localized area at the Site.

Farallon understands that the planned redevelopment will include two slab-on-grade multistory residential buildings. The main elements of the selected permanent cleanup action at the Site include:

- Minimal grading and shallow excavation in preparation for new building footings and subsurface utilities;



- Temporary construction stormwater management and erosion controls, as needed, during the construction project;
- Implementation of a compliance groundwater monitoring program; and
- An Environmental Covenant.

The selected permanent cleanup action will protect human health and the environment by eliminating risks posed by the COCs remaining in a localized area of the Site. Therefore, Farallon requests a No Further Action (NFA) determination from Ecology for the Site upon implementation of the selected permanent cleanup action.

1.1 PURPOSE AND OBJECTIVES

The purpose of an FFS and DCA is to develop and evaluate cleanup action alternatives to facilitate selection of a permanent cleanup action at a site in accordance with WAC 173-340-350(8). This FFS was conducted to screen remediation technologies and eliminate those deemed not technically practicable in accordance with applicable MTCA regulations. This DCA was conducted to facilitate selection of the cleanup action alternative that provides the highest degree of permanence to the maximum extent practicable. The DCA conducted in accordance with WAC 173-340-360(3)(e) considered the cleanup action alternatives and the incremental estimated cost associated with each of them.

1.2 ORGANIZATION

This FFS and DCA has been organized as follows.

- **Section 2, Site Description and Background**, presents a description of the Site, and a summary of Site geology and hydrogeology, the RI conducted for the Site, and interim actions conducted for the Site.
- **Section 3, Conceptual Site Model**, identifies the applicable or relevant and appropriate requirements (ARARs), cleanup action objectives, COCs, media of concern, results from a terrestrial ecological evaluation (TEE), and cleanup standards for soil and groundwater.
- **Section 4, Focused Feasibility Study**, describes the evaluation of feasible cleanup technologies and potentially feasible cleanup action alternatives, the evaluation process, potential cleanup action alternatives, and the DCA conducted for the Site; and presents the recommended permanent cleanup action alternative.
- **Section 5, Compliance Groundwater Monitoring Plan**, describes the annual compliance groundwater monitoring program that will be implemented as part of the selected cleanup action to confirm compliance at the conditional point of compliance for the Site.
- **Section 6, Operations and Maintenance Plan**, describes the annual operations and maintenance required for the compliance monitoring wells.



- **Section 7, Conclusions and Request for NFA Determination**, summarizes Farallon's conclusions and presents a request for a Site-specific NFA determination, including an Environmental Covenant.
- **Section 8, References**, provides a list of the references and source materials used in preparing this FFS and DCA.
- **Section 9, Limitations**, provides Farallon's standard limitations.



2.0 SITE DESCRIPTION AND BACKGROUND

This section provides a description of the current and historical Site, and a summary of Site geology and hydrogeology, the RI conducted at the Site, and interim actions conducted at the Site.

2.1 PROPERTY DESCRIPTION

The Site is located between the Cedar River and the Maple Valley Highway, just east of Interstate 405 (Figure 1). The Site comprises King County Parcel No. 172305-9026 totaling 12.54 acres of land. According to the City of Renton (2015) *Zoning* map, the Site is zoned as Resource Conservation. The Site is located within the City of Renton Aquifer Protection Zone, which precludes industrial activities that use, handle, or store hazardous substances on the Site.

The Site historically was occupied by a concrete batch plant and associated support operations and structures since the 1960s (Figure 2). Concrete batch plant operations ceased prior to October 14, 2002 in conformance with the City of Renton ordinances relative to the Aquifer Protection Zone and operating permits. The Site currently is vacant and used for temporary storage of construction equipment.

2.2 GEOLOGY AND HYDROGEOLOGY

The Site is located within the Cedar River Basin of the Puget Lowlands. The 1965 *Geologic Map of the Renton Quadrangle, King County, Washington* reviewed identified soil underlying the vicinity of the Site as Holocene alluvium deposits consisting primarily of sand and gravel deposited by the Cedar River (U.S. Geological Survey 1965).

The general stratigraphy encountered at the Site during the RI conducted by others included alluvium deposits with variable quantities of unconsolidated sand and gravel with occasional layers of silt ranging in depth from 5 to 18 feet below ground surface (bgs). Fill material, including concrete, gravel, boulders, pea gravel, and silty sands ranging in depth from near surface to 10 feet bgs, was encountered and excavated during interim actions conducted on the southern portion of the Site. Locations of the interim actions are shown on Figure 3. Figure 4 presents a cross-section depicting the general stratigraphy and hydrogeology for the Site.

Compliance groundwater monitoring has been conducted at the Site between 2009 and 2017. Groundwater elevations calculated during compliance groundwater monitoring events have ranged from approximately 27.15 feet above mean sea level (msl) in monitoring well MW-1 to 32.95 feet above msl in monitoring well EPI-MW-7 (Table 1). The groundwater flow direction has consistently been to the northwest, away from the Cedar River toward Southeast Maple Valley Highway (Figure 5). Additional information on groundwater conditions at the Site and in the Cedar River Basin is provided in the revised *Interim Action Report Volume 1, Former Stoneway Batch Plant, 1915 SE Maple Valley Highway, Renton, Washington* dated October 12, 2011, prepared by Environmental Partners, Inc. (EPI) (2011) (Revised Interim Action Report).



2.3 PREVIOUS INVESTIGATIONS AND INTERIM ACTIONS

A summary of previous investigations and interim actions conducted at the Site by others is provided below.

2.3.1 Remedial Investigation

Numerous environmental investigations have been completed at the Site and are documented in the *Remedial Investigation Report, Stoneway Concrete, 1915 SE Maple Valley Highway, Renton, WA* dated May 5, 2006, prepared by EPI (2006). Results from previous investigations identified the following COCs at the Site:

- GRO, DRO, and ORO in soil;
- Formaldehyde in soil and groundwater; and
- Arsenic in groundwater.

2.3.2 Interim Actions

Interim actions completed at the Site by EPI are summarized in the Revised Interim Action Report. The main elements of the interim actions completed from 2007 to 2011 included:

- Excavation and on-Site treatment via aerobic degradation of soil containing concentrations of DRO, ORO, GRO, and formaldehyde exceeding applicable MTCA cleanup levels;
- Excavation and off-Site recycling of soil containing elevated pH to the maximum extent practicable; and
- Compliance groundwater monitoring to demonstrate MNA of residual COCs in groundwater.

The interim actions addressed COCs in soil and/or groundwater at areas associated with historical operations at the Site. Locations of interim actions completed at the Site are shown on Figure 3. Summaries for each interim action area are provided below:

- **GRO-Impacted Soil Area:** Excavation of GRO-impacted soil was conducted on the northern portion of the Site. Confirmation soil samples were collected at the final limits of the excavation.
- **Work Area 1, Former Small Settling Pond:** Soil with elevated pH was present in the former small settling pond on the southwestern portion of the Site, which historically was backfilled with soil and gravel. The extent of elevated pH in soil was determined using field-screening methods. Soil was excavated for off-Site recycling from areas where field-screening results indicated that the pH was above 8.0 in soil. Approximately 200 cubic yards of soil with elevated pH was excavated from the small settling pond to a maximum depth of 8 feet bgs. Sixteen confirmation soil samples were collected from the final limits of the excavation, and pH ranged from 6.5 to 8.0 in each soil sample collected.



- **Work Area 2, Large Settling Ponds:** Soil with elevated pH was present in three large settling ponds on the southern portion of the Site adjacent to the Cedar River. The large settling ponds are concrete-lined and extend approximately 15 feet bgs. Soil excavation continued until the concrete walls and floors of the large settling ponds were exposed. Approximately 2,200 cubic yards of soil with elevated pH was excavated from the large settling ponds for off-Site recycling in 2010 (Figure 4). Because all soil in the large settling ponds was removed and only exposed concrete of the settling ponds remained, no performance soil samples were collected at the final extents of the excavation. Following completion of excavation in Work Area 2, EPI (2011) stated the following:

There appears to be a minor amount of high pH material in and immediately surrounding the southern settling ponds that cannot be practicably removed . . . [T]he removal of these soils would require deep excavation adjacent to the Cedar River. The deep excavation would endanger the rip-rap shoreline protection of the Cedar River and poses the potential for slope failure, erosion, and potential silt and/or sediment release to the Cedar River and its salmon spawning habitat. Any excavation of the residual pH-impacted soils would likely require the construction of a diversion structure for a portion of the river, deep shoring or slope laybacks, and extensive hydraulic control.

The estimated area of residual pH-impacted soil left in-place adjacent to the large settling ponds is shown on Cross-Section A-A' (Figure 4).

- **Work Area 3, Shallow Petroleum-Impacted Soil:** Approximately 190 cubic yards of soil with concentrations of DRO and ORO exceeding applicable MTCA cleanup levels was excavated to a depth of 4 feet bgs on the southern portion of the Site. DRO and ORO were reported at concentrations less than MTCA Method A cleanup levels in the twelve confirmation soil samples collected from the final extents of the excavation.
- **Work Area 4, Formaldehyde-Impacted Soil:** Approximately 21,030 cubic yards of soil was excavated to a maximum depth of 11 feet bgs in a large area on the central portion of the Site in 2010 (Figures 3 and 4). A total of 447 performance soil samples were collected and analyzed for formaldehyde. Of the 447 performance soil samples collected, 238 soil samples were collected at the final extents of the excavation and are considered confirmation soil samples for the interim action. Analytical results indicated that concentrations of formaldehyde were reported non-detect at the laboratory practical quantitation limit (PQL) in the confirmation soil samples collected from the final extents of the excavation (Figure 4).
- **Work Area 5, Heating Oil Underground Storage Tank:** A 600-gallon heating oil underground storage tank was discovered during demolition of a building on the north-central portion of the Site. The heating oil underground storage tank was permanently decommissioned by removal in accordance with local and state regulations. Approximately 200 cubic yards of impacted soil was excavated to a maximum depth of 23 feet bgs. DRO and ORO were reported at concentrations less than MTCA Method A cleanup levels in the eleven confirmation soil samples collected from the final extents of the excavation.



2.3.1 Compliance Groundwater Monitoring Program

In response to the interim actions completed from 2007 through 2011, Ecology (2011a, 2011b) issued the opinion letters dated May 9 and December 29, 2011 requiring further action to demonstrate that the proposed final remedy of MNA for residual COCs exceeding MTCA cleanup levels in groundwater would be attained at the point of compliance sufficient to support a request for an NFA determination for the Site. EPI met with Ecology on multiple occasions following receipt of the opinion letter dated December 29, 2011 (Ecology 2011b) to discuss Ecology's remaining concerns regarding the interim actions completed at the Site and to develop a scope of work to address Ecology's concerns. Specifically, Ecology was concerned that potential seasonal groundwater migration toward the Cedar River could result in a potential groundwater to surface water exposure pathway for arsenic concentrations exceeding the MTCA Method A cleanup level in groundwater from a localized area on the southern portion of the Site proximate to monitoring wells EPI-MW-7 and EPI-MW-9 (Figures 5 and 6).

In response to Ecology's concerns, EPI installed groundwater monitoring well MW-10 on the southern, up-gradient portion of the Site as close as possible to the Cedar River to evaluate the potential groundwater to surface water exposure pathway. Multiple groundwater monitoring events conducted from 2009 through 2017 by Farallon and EPI confirmed that the groundwater flow direction is to the northwest, away from the Cedar River. The groundwater elevation contours and flow direction from the July 2017 groundwater monitoring event are shown on Figure 5.

During groundwater monitoring events conducted from 2009 through 2017 by Farallon and EPI, groundwater samples were collected and submitted for laboratory analysis for formaldehyde, arsenic, and pH (Table 2; Figure 6). Laboratory analytical reports for groundwater samples collected by Farallon during groundwater monitoring events conducted in 2016 and 2017 are provided in Appendix A. The groundwater sample analytical results for groundwater monitoring events are summarized below.

- Arsenic was detected at concentrations exceeding laboratory PQLs in groundwater samples collected from monitoring wells MW-1, EPI-MW-1, EPI-MW-6 through EPI-MW-9, and MW-10. Arsenic concentrations exceeded the MTCA Method A cleanup level of 5 micrograms per liter ($\mu\text{g/l}$) in groundwater samples collected from monitoring wells EPI-MW-7, EPI-MW-9, and MW-10, which are located down-gradient of the large settling ponds. The highest concentration of arsenic was 9.7 $\mu\text{g/l}$ detected in a groundwater sample collected from monitoring well EPI-MW-7 in October 2012. The estimated extent of dissolved-phase arsenic in groundwater exceeding the MTCA Method A cleanup level is shown on Figure 6.
- pH has generally ranged between 6.5 and 8.5 in groundwater collected from monitoring wells across the Site with the exception of monitoring wells EPI-MW-7 and MW-10, located proximate to the large settling ponds, in which pH has ranged between 7.59 and 12.54.
- Historically, formaldehyde was detected at low concentrations ranging from 5 to 18 $\mu\text{g/l}$ in groundwater samples collected from monitoring wells MW-1, EPI-MW-7 through EPI-MW-9, and MW-10. The highest concentration of formaldehyde was 18 $\mu\text{g/l}$ detected in a



groundwater sample collected from monitoring well MW-10 in June 2010. Formaldehyde has not been detected at concentrations exceeding the laboratory PQL in groundwater samples collected at the Site since April 2015.

Monitoring wells with concentrations of arsenic exceeding the MTCA Method A cleanup level during one or more of the groundwater monitoring events generally correlate to areas with elevated pH in groundwater and to areas proximate to the large settling ponds where residual soil with elevated pH was left in-place during the interim actions. Analytical results from groundwater monitoring events have demonstrated a steady decrease in pH values and arsenic concentrations over time in groundwater samples collected from monitoring wells EPI-MW-7 and EPI-MW-9. Concentrations of arsenic have slightly exceeded the MTCA Method A cleanup level in only two groundwater samples collected during the four most-recent groundwater monitoring events conducted in 2016 and 2017 (Figure 6).

Twenty-three groundwater monitoring events have been conducted at Site since March 2009. Concentrations of arsenic and formaldehyde have been reported non-detect at laboratory PQLs in all groundwater samples collected from conditional point of compliance monitoring wells MW-1 and EPI-MW-1, down-gradient of historical Site operations on the northwestern Site boundary (Figure 6). In addition, pH has ranged from 6.52 to 7.86 in groundwater collected from monitoring well EPI-MW-1, which is within the Secondary Maximum Contaminant Level pH range of 6.5 to 8.5 established by the U.S. Environmental Protection Agency (EPA) National Secondary Drinking Water Regulations.

2.3.2 Soil Gas Survey

Soil gas samples were collected by EPI from five locations on the Site during January 2016. The purpose of the soil gas sampling was to evaluate formaldehyde concentrations in the shallow subsurface following completion of source removal excavations and bioremediation of formaldehyde-impacted soil in 2010 on the central portion of the Site. Formaldehyde was detected at low concentrations ranging from 4.62 to 7.37 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) in soil gas samples collected from the Site.



3.0 CONCEPTUAL SITE MODEL

This section provides a summary of the conceptual site model derived from the results of the RI, interim actions, and subsequent groundwater characterization and compliance monitoring events conducted at the Site. Included in this section is a discussion of the ARARs, cleanup action objectives, COCs, medium of concern, TEE, and cleanup standards, including the cleanup levels and points of compliance. The conceptual site model is used as a basis for developing technically feasible cleanup action alternatives and for selecting a permanent cleanup action in accordance with applicable MTCA regulations.

3.1 APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS

The primary ARARs and guidance documents related to the cleanup action are:

- Model Toxics Control Act, Chapter 70.105D of the Revised Code of Washington (RCW 70.105D); and
- MTCA, WAC 173-340.

These primary ARARs are applicable to the cleanup action because they provide the framework for the cleanup action, including applicable and relevant regulatory guidelines, cleanup standards, waste disposal criteria, references for additional ARARs, and standards for documentation of the cleanup action.

Other applicable ARARs and guidance documents related to the cleanup action completed for the Site are:

- Occupational Safety and Health Act, Part 1910 of Title 29 of the Code of Federal Regulations;
- Safety Standards for Construction Work, WAC 296-155;
- Washington State Solid Waste Management Laws and Regulations, RCW 70.95 and WAC 173-351 and 173-304;
- State Environmental Policy Act;
- Section 404 of the Clean Water Act;
- City of Renton Aquifer Protection Program;
- City of Renton Shoreline Master Program;
- Washington Department of Fish and Wildlife Hydraulic Permit Approval;
- *Guidance for Evaluating Soil Vapor Intrusion in Washington State: Investigation and Interim Remedial Action* (Ecology 2009); and
- Accreditation of Environmental Laboratories, WAC 173-50.



Maple Valley, LLC is responsible for obtaining permits from the City of Renton to support Site redevelopment prior to implementation of the permanent cleanup action.

3.2 CLEANUP ACTION OBJECTIVES

The cleanup action objectives were to:

- Protect human health and the environment by eliminating the risks posed by concentrations of COCs detected in soil at the Site;
- Meet MTCA cleanup levels and/or screening levels established for soil, soil gas, and groundwater at the points of compliance;
- Comply with state and federal laws applicable to the cleanup action; and
- Provide for compliance monitoring.

3.3 CONSTITUENTS OF CONCERN

The COCs for the Site are defined as the chemical compounds detected at concentrations exceeding MTCA Method A cleanup levels in soil and/or groundwater samples following interim actions completed at the Site. The remaining COC for the Site is arsenic based on its detection at concentrations exceeding the MTCA Method A cleanup level in groundwater samples. Concentrations of arsenic have exceeded the MTCA Method A cleanup level in groundwater samples collected from monitoring wells EPI-MW-7, EPI-MW-9, and MW-10, which are located down-gradient of the large settling ponds (Figures 3 and 6). Concentrations of arsenic exceeding the MTCA Method A cleanup level in groundwater samples have been attributed to a localized area of soil with elevated pH proximate to the large settling ponds. Therefore, the localized area of soil with elevated pH is considered a constituent of potential concern based on the concentrations of arsenic in groundwater.

3.4 MEDIUM OF CONCERN

Groundwater was identified as the only medium of concern based on results from the RI, interim actions, and groundwater characterization and compliance monitoring conducted at the Site through July 2017.

Soil has been retained as a potential medium of concern because residual soil with elevated pH has increased solubility of naturally occurring arsenic, resulting in concentrations of arsenic exceeding the MTCA Method A cleanup level in groundwater samples collected from monitoring wells EPI-MW-7, EPI-MW-9, and MW-10, which are located down-gradient of the large settling ponds (Figures 3, 4, and 6).

Soil gas was considered a potential medium of concern for the Site based on soil gas results from sampling conducted in 2016. However, based on the extensive source removal excavation of formaldehyde-contaminated soil completed in 2010, formaldehyde soil gas screening levels are not listed in Table B-1 of the Ecology (2009) draft *Guidance for Evaluating Soil Vapor Intrusion*



in Washington State: Investigation and Remedial Action revised in February 2016. Therefore, soil gas is not considered a medium of concern for the Site.

3.5 TERRESTRIAL ECOLOGICAL EVALUATION

A TEE is required by WAC 173-340-7490 for any site where a hazardous substance has been released to soil. The regulation requires that one of the following actions be taken:

- Documenting a TEE exclusion using the criteria presented in WAC 173-340-7491;
- Conducting a simplified TEE in accordance with WAC 173-340-7492; or
- Conducting a site-specific TEE in accordance with WAC 173-340-7493.

The Site is excluded from a TEE because contaminated soil is at least 6 feet bgs and engineering and institutional controls will be used to manage remaining contamination based on the criteria for TEE exclusion in WAC 173-340-7491(1)(a). No further consideration of ecological impacts is required under MTCA. The TEE form is provided in Appendix B.

3.6 CLEANUP STANDARDS

As defined in WAC 173-340-700, cleanup standards include establishing cleanup levels and the points of compliance at which the cleanup levels are to be attained. The cleanup standards for the Site were established in accordance with WAC 173-340-700 through 173-340-760 to be protective of human health and the environment.

3.6.1 Groundwater Cleanup Levels

Groundwater cleanup levels are the concentrations of COCs to be met at the point of compliance defined for the Site. Arsenic is the only COC for groundwater at the Site. The MTCA Method A cleanup level for arsenic in groundwater at the Site is 5 µg/l.

3.6.2 Point of Compliance

Points of compliance are the locations at which cleanup levels for the COCs must be attained to meet the requirements of MTCA and support issuance of an NFA determination for the Site from Ecology.

A conditional point of compliance for groundwater at the Site was established in accordance with WAC 173-340-720(8)(c) because it is not practicable to meet the MTCA Method A cleanup level for groundwater throughout the Site in a reasonable restoration time frame due to residual soil with elevated pH impacting concentrations of arsenic in groundwater in a localized area on the central portion of the Site. The conditional point of compliance for groundwater at the Site is defined as the down-gradient northwestern Site boundary.



3.7 FORMALDEHYDE

Formaldehyde previously was considered a COC for the Site in soil, groundwater, and soil gas. The formaldehyde cleanup levels previously established for the Site by Ecology in 2011 were based on laboratory PQLs because the former MTCA cleanup level resulted in a cleanup level less than the detection limits of available analytical methods. However, the MTCA cleanup levels have been revised since the formaldehyde cleanup levels were established in 2011 for the Site. Currently, the MTCA Method B soil and groundwater cleanup levels are 16,000 milligrams per kilogram (mg/kg) and 1,600 µg/l, respectively. Concentrations of formaldehyde have not exceeded MTCA Method B cleanup levels in soil and groundwater samples collected from the Site. In response to a request from Ecology (2017), Farallon confirmed the current laboratory PQL for groundwater offered by ALS Environmental of Kelso, Washington, which is the only Washington State-accredited laboratory to analyze groundwater for formaldehyde according to Ecology's online laboratory database. On September 19, 2017, ALS Environmental (2017) confirmed to Farallon that the laboratory PQLs for formaldehyde in soil and groundwater are 2 mg/kg and 100 µg/l, respectively.

Formaldehyde was detected at low concentrations in soil gas samples collected from the Site in 2016. EPI had developed a screening level for formaldehyde of 6.4 µg/m³ during the interim action. However, formaldehyde screening levels and indoor air cleanup levels are not established in Table B-1, *Indoor Air Cleanup Levels, Groundwater Screening Levels, and Soil Gas Screening Levels*, of the Ecology (2009) draft *Guidance for Evaluating Soil Vapor Intrusion in Washington State: Investigation and Remedial Action* revised in February 2016.

Based on the extensive interim action source removal excavation of formaldehyde-contaminated soil completed in 2010, the updated MTCA Method B soil and groundwater cleanup levels, and the results of multiple rounds of groundwater sampling at the Site, it is confirmed that formaldehyde concentrations are either non-detect or significantly less than MTCA Method B cleanup levels at the Site. Therefore, formaldehyde has been eliminated as a COC for the Site.



4.0 FOCUSED FEASIBILITY STUDY

This section provides a summary of the scope of work for the FFS conducted for the Site, and the results. Included is a discussion of the evaluation of feasible cleanup technologies and potentially feasible cleanup action alternatives considered for the Site, and the evaluation process. The DCA conducted for the Site and the recommended permanent cleanup action alternative also are described.

The purpose of an FFS is to develop and evaluate cleanup action alternatives to facilitate selection of a permanent cleanup action at the Site in accordance with WAC 173-340-350(8). An FFS typically includes an extensive development, screening, and evaluation process involving numerous cleanup action alternatives. However, because the Site-specific conditions precluded many potential cleanup action alternatives, and because the interim actions previously completed at the Site removed the vast majority of COC-contaminated soil (with the exception of potential residual high-pH soil proximate to the large settling ponds on the southern portion of the Site), this evaluation focused on potentially feasible cleanup actions that are capable of achieving cleanup goals based on consideration of applicable MTCA criteria, Site-specific conditions, and Farallon's professional experience.

The purpose of the FFS was to develop and evaluate cleanup action alternatives and eliminate those that are not technically feasible, those whose costs are clearly disproportionate under WAC 173-340-360(3)(e), or those that will substantially affect redevelopment of the Site. A preliminary redevelopment Site plan is provided in Appendix C.

The purpose of the FFS was also to evaluate the most-advantageous remediation technologies to recommend a permanent cleanup action for the Site in conformance with WAC 173-340-360 through 173-340-390. This FFS is intended to provide sufficient information to enable Ecology and Maple Valley, LLC to reach concurrence on the selection of a final cleanup remedy for the Site.

4.1 EVALUATION OF FEASIBLE CLEANUP TECHNOLOGIES

As part of the FFS, Farallon evaluated remediation technologies for the Site with respect to the cleanup requirements set forth in MTCA. The FFS considered the requirements under WAC 173-340-350, Site-specific conditions, and criteria defined in WAC 173-340-360 in screening potentially feasible cleanup action alternatives for the Site. A cleanup action must satisfy 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:

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

The evaluation of potentially feasible cleanup action alternatives and the results from the FFS are provided below.

4.2 EVALUATION OF POTENTIALLY FEASIBLE CLEANUP ACTION ALTERNATIVES

This section describes the evaluation of potentially feasible cleanup action alternatives for the Site with respect to the requirements set forth in MTCA under WAC 173-340-350 through 173-340-370. During the screening of potentially feasible cleanup action alternatives, Farallon also considered Site-specific conditions, including redevelopment plans for the Site and the distribution of the COC remaining in the affected medium. The sections below provide an overview of the evaluation of potential remediation technologies conducted by Farallon using the screening process set forth in MTCA under WAC 173-340-350(8)(b), and the focused screening of potential remediation technologies using the requirements and procedures for selecting cleanup actions set forth in MTCA under WAC 173-340-360(2)(a) and 173-340-360(2)(b) that was used by Farallon for the FFS.

4.3 EVALUATION PROCESS

The criteria used by Farallon to qualitatively evaluate potentially feasible cleanup action alternatives were derived from WAC 173-340-360(3)(f) and include:

- **Protectiveness:** Overall protectiveness of human health and the environment, including the degree to which existing risks are reduced, the time required to reduce risk at the facility and attain cleanup standards, on-Site risks resulting from implementing the alternative, and the improvement of overall environmental quality.
- **Permanence:** The degree to which the alternative permanently reduces the toxicity, mobility, or volume of hazardous substances, including the adequacy of the alternative in destroying the hazardous substances, the reduction or elimination of hazardous substance releases and sources of releases, the degree of irreversibility of the waste treatment process, and the characteristics and quantity of treatment residuals generated.
- **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 the Site at concentrations exceeding cleanup levels, and the magnitude of residual risk with the alternative in place. The following types of cleanup action components may be used as a guide in assessing the relative degree of long-term effectiveness, presented in descending order: reuse or recycling; destruction or



detoxification; immobilization or solidification; on- or off-Site disposal in an engineered, lined, and monitored facility; on-Site isolation or containment with attendant engineering controls; and institutional controls and monitoring.

- 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 measures that will be taken to manage such risks.
- 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, and access.
- Consideration of public concerns: Whether the community has concerns regarding the alternative and, if so, the extent to which the alternative addresses those concerns. This process involves concerns from individuals, community groups, local governments, federal and state agencies, or other organizations that may have an interest in or knowledge of the Site.
- Cost: The cost to implement the alternative, including the cost of construction, the net present value of long-term costs, and Ecology oversight costs recoverable under the VCP. Long-term costs include operation and maintenance, monitoring, and reporting costs.

As described in Section 3, Conceptual Site Model, groundwater is the only affected medium of concern remaining at the Site following completion of interim actions from 2007 to 2011 and subsequent groundwater characterization and compliance groundwater monitoring conducted between 2009 and 2017. Soil has been retained as a potential medium of concern because residual soil with elevated pH has increased solubility of naturally occurring arsenic, resulting in concentrations of arsenic exceeding the MTCA Method A cleanup level in groundwater samples collected from monitoring wells EPI-MW-7, EPI-MW-9, and MW-10, which are located down-gradient of the large settling ponds (Figures 3 and 6).

Concentrations of arsenic exceeded the MTCA Method A cleanup level in groundwater samples collected from a localized area on the south-central portion of the Site. Therefore, Farallon performed a preliminary screening of remediation technologies typically applied to sites with the same or comparable COCs to eliminate technologies that did not meet the minimum requirements for protectiveness, permanence, implementability, and cost described above. Table 3 provides a summary of the preliminary technology screening. Farallon eliminated a number of remediation technologies during the initial screening process, as set forth in MTCA under WAC 173-340-350(8)(b). These technologies included but were not limited to: reverse osmosis; ion exchange; and soil mixing (Table 3).



4.4 POTENTIAL CLEANUP ACTION ALTERNATIVES

The preliminary screening of remediation technologies identified the following cleanup action alternatives as potentially applicable to the Site:

- Cleanup Action Alternative 1: No remedial action;
- Cleanup Action Alternative 2: Removal by excavation of soil with elevated pH and compliance groundwater monitoring to confirm that COCs have reduced via MNA to concentrations less than MTCA Method A cleanup levels; and
- Cleanup Action Alternative 3: Institutional controls, including an Environmental Covenant and compliance groundwater monitoring to confirm that COCs meet the conditional point of compliance, as needed.

A summary of the main remediation components considered under Cleanup Action Alternatives 1 through 3 is provided below:

- No remedial action assumes that no active remediation will be conducted to reduce residual soil contamination. This alternative assumes MNA for residual groundwater contamination.
- Removal by excavation assumes that additional significant shoring design and installation will be required to facilitate excavation and removal of residual soil with elevated pH immediately adjacent to the Cedar River. This alternative requires extensive permitting, the construction of a diversion structure for a portion of the Cedar River, deep shoring or slope laybacks, and extensive hydraulic control.
- Institutional controls assume implementation of institutional controls, including obtaining an Environmental Covenant for the localized areas of soil with elevated pH remaining in-place and groundwater with concentrations of arsenic exceeding MTCA cleanup levels; and implementation of a compliance groundwater monitoring program.

It was necessary for Farallon to evaluate alternatives that could be implemented in conjunction with the redevelopment of the Site. A detailed evaluation of Cleanup Action Alternatives 1 through 3 using the criteria described above is presented in Table 4, which includes parameters such as the MTCA Composite Benefit Score and the estimated costs used in the DCA, described in Section 4.5.

Cleanup Action Alternative 1 (No Remedial Action) is not an applicable remedial alternative because residual soil with elevated pH is an ongoing source for arsenic in groundwater and constitutes a potential threat to human health and/or the environment. Farallon concluded that Cleanup Action Alternative 2, excavation of the localized areas of soil with elevated pH remaining in-place, was not technically feasible because of the significant environmental and health and safety risks and the disproportionate costs associated with performing the work in the context of the already-performed interim action excavations. Specifically, Cleanup Action Alternative 2 assumes significant permitting, shoring, and hydraulic control will be necessary due to the proximity of the Cedar River immediately south-adjacent to the Site. A summary of the DCA is provided below.



4.5 DISPROPORTIONATE COST ANALYSIS

The purpose of the DCA is to facilitate selection of the cleanup action alternative that provides the highest degree of permanence to the maximum extent practicable. The DCA conducted considered the cleanup action alternatives and the incremental estimated cost associated with each alternative.

Chart 1 graphically presents the results from the DCA. The green bars indicate the environmental benefit offered by the cleanup action alternative as measured by the MTCA Composite Benefit Score using the left axis of the graph. The blue bars reflect cost estimates using the right axis of the graph.

The cost for implementing Cleanup Action Alternative 2 is disproportionate to the environmental benefits that would be achieved, and is considered to be impracticable under MTCA. The risks of implementing Cleanup Action Alternative 2 are significant, given the presence of the Cedar River immediately adjacent to the Site, which would have required significant permitting, structural engineering, shoring, and hydraulic controls to ensure that excavation work could be conducted immediately adjacent to the Cedar River while protecting human health and the environment.

Cleanup Action Alternative 2 is considered to be impracticable under MTCA because of the unsatisfactory evaluation results for implementability and short-term risk management, combined with the high relative costs (Chart 1). Table 4 provides additional rationale for considering Cleanup Action Alternative 2 to be impracticable.

4.6 RECOMMENDED PERMANENT CLEANUP ACTION ALTERNATIVE

Based on the FFS evaluation and DCA, Cleanup Action Alternative 3 is the recommended permanent cleanup action alternative for the Site. The technical approach for the cleanup action includes:

- Implementation of institutional controls, including obtaining an Environmental Covenant for the localized area of soil with elevated pH and arsenic-contaminated groundwater, and compliance groundwater monitoring; and
- Compliance groundwater sampling of Site monitoring wells to confirm that concentrations of arsenic in groundwater continue to meet the MTCA Method A cleanup level at the conditional point of compliance.

4.6.1 Protection of Human Health and the Environment

The selected cleanup action will protect human health and the environment by providing an institutional control to prevent removal of groundwater and disturbance of soil at the Site.

4.6.2 Compliance with Cleanup Standards

The selected cleanup action complies with the cleanup standards by meeting MTCA cleanup levels for the COC with the exception of concentrations of arsenic in the localized areas of groundwater proximate to the large settling ponds. Institutional controls, including an Environmental Covenant, will be instituted for King County Parcel No. 172305-9026 to ensure that engineering controls are



maintained. A draft Environmental Covenant is provided in Appendix D for Ecology review and approval.

4.6.3 Compliance with Applicable State and Federal Laws

The selected cleanup action will comply with the requirements of MTCA and applicable federal laws. The cleanup action is being conducted as an independent cleanup action under the Ecology VCP in accordance with applicable MTCA requirements.

4.6.4 Provision for Compliance Monitoring

The selected cleanup action provides for compliance groundwater monitoring of the localized area of arsenic-contaminated groundwater. A compliance groundwater monitoring plan is provided in Section 5.0.

4.6.5 Permanence

The selected cleanup action for groundwater will result in permanent achievement of cleanup action objectives. It is anticipated that groundwater with low concentrations of arsenic exceeding MTCA Method A cleanup levels in the localized area proximate to the large settling ponds will attenuate over time. In the interim, institutional controls, including an Environmental Covenant, will be instituted to ensure ongoing compliance groundwater monitoring at the Site.

4.6.6 Reduction of Toxicity, Mobility, and Volume of Contaminants

The selected cleanup action will permanently mitigate the remaining localized area and volume of arsenic in groundwater at the Site, resulting in permanent elimination of contaminant toxicity and mobility at the Site. An Environmental Covenant will be instituted to ensure ongoing compliance groundwater monitoring at the Site.

4.6.7 Short-Term Risks

The selected cleanup action alternative involves short-term risks associated with redevelopment of the Site. Dust control and air-monitoring programs will be implemented to effectively minimize these short-term risks.

4.6.8 Implementability

The selected cleanup action can be readily implemented at the Site. Compliance groundwater monitoring is ongoing.

4.6.9 Restoration Time Frame

It is not practicable to meet groundwater cleanup levels at the standard point of compliance within a reasonable restoration time frame due to soil left in-place with elevated pH. However, this selected cleanup action has established a conditional point of compliance on the northwestern Site boundary.



5.0 COMPLIANCE GROUNDWATER MONITORING PLAN

Compliance groundwater monitoring will be conducted as part of the selected cleanup action. At a minimum, groundwater will be monitored annually for a period of 5 years using compliance monitoring wells MW-1, EPI-MW-1, and EPI-MW-7 (Figure 6).

Compliance groundwater monitoring events will include measurement of water levels and total monitoring well depths, and collection of groundwater samples from monitoring wells MW-1, EPI-MW-1, and EPI-MW-7 (Figure 6). The results of the groundwater monitoring events will be used to assess groundwater flow and gradient, and groundwater quality at the Site to ensure that the MTCA Method A cleanup level for arsenic is attained at the conditional point of compliance at the down-gradient, northwestern Site boundary.

Groundwater samples will be collected in accordance with the *Low Stress (Low Flow) Purging and Sampling Procedure for the Collection of Groundwater Samples from Monitoring Wells* dated January 19, 2010, prepared by EPA (2010). Groundwater samples will be collected directly from the pump outlet following stabilization of the geochemical parameters in accordance with the EPA (2010) guidance for low-flow purging and sampling. Groundwater samples will be analyzed for arsenic and pH on an annual basis. Laboratory analytical results will be uploaded to Ecology's Environmental Information Management database.



6.0 OPERATIONS AND MAINTENANCE PLAN

Operations and maintenance will be conducted as part of the selected cleanup action to evaluate the integrity of compliance groundwater monitoring wells at the Site. Compliance groundwater monitoring wells (MW-1, EPI-MW-1, and EPI-MW-7) will be inspected on an annual basis to determine whether any damage has occurred that could affect the integrity or performance of the monitoring wells.

The annual inspection will be conducted by qualified personnel closely inspecting the compliance monitoring wells. The results of the annual inspection will be documented in a field report, and photographs of the monitoring wells will be obtained during each inspection and maintained in the electronic project file.

If damage to the compliance monitoring wells is observed and/or reported during or outside the annual operations and maintenance inspections, a report will be filed with Ecology within 3 business days of the discovery.

Damage to the monitoring wells will be promptly repaired by retaining the appropriate contractor. A report documenting the repair will be submitted to Ecology within 30 days.



7.0 CONCLUSIONS AND REQUEST FOR NFA DETERMINATION

This FFS and DCA provides sufficient documentation required to support the selection of the proposed permanent cleanup action for the Site.

Based on results from the interim actions and compliance groundwater sampling events conducted at the Site, arsenic is the only COC for the Site. Soil with elevated pH is a potential COC for the Site because soil left in-place proximate to the large settling ponds has increased solubility of naturally occurring arsenic. Formaldehyde is not considered a COC for soil, groundwater, or soil gas based on the current MTCA Method B cleanup levels.

The proposed cleanup action of institutional controls, compliance monitoring, and operations and maintenance is the preferred cleanup alternative based on the documentation provided in this FFS and DCA. The selected cleanup action for the Site will meet the threshold and other requirements defined in WAC 173-340-360(2) for cleanup actions, including protection of both human health and the environment, compliance with applicable cleanup standards and state and federal laws, providing for compliance monitoring, and providing a permanent and final cleanup solution. Based on the results of this FFS and DCA, Farallon will request that an NFA determination be issued by Ecology for the Site upon completion of the selected cleanup action.



8.0 REFERENCES

- ALS Environmental. 2017. Email Regarding Formaldehyde Limits. From Kelley Lovejoy. To Pete Kingston, Farallon Consulting, L.L.C. September 19.
- City of Renton. 2015. *Zoning map*.
- Environmental Partners, Inc. (EPI). 2006. *Remedial Investigation Report, Stoneway Concrete, 1915 SE Maple Valley Highway, Renton, WA*. May 6.
- . 2011. *Interim Action Report Volume 1, Former Stoneway Batch Plant, 1915 SE Maple Valley Highway, Renton, Washington*. Prepared for Stoneway Concrete. October 12.
- U.S. Environmental Protection Agency (EPA). 2010. *Low Stress (Low Flow) Purging and Sampling Procedure for the Collection of Groundwater Samples from Monitoring Wells*. January 19.
- U.S. Geological Survey. 1965. *Geologic Map of the Renton Quadrangle, King County, Washington*.
- Washington State Department of Ecology (Ecology). 2009. *Guidance for Evaluating Soil Vapor Intrusion in Washington State: Investigation and Interim Remedial Action*. Revised February 2016. October.
- . 2011a. Letter Regarding Further Action at the Stoneway Concrete Site. From Libby S. Goldstein. To Michael Merlino, Stoneway Concrete. May 9.
- . 2011b. Letter Regarding Opinion Pursuant to WAC 173-340-515(5) Interim Action Report, October 12, 2011, for the Stoneway Concrete Hazardous Waste Site. From Libby S. Goldstein. To Michael Merlino, Stoneway Concrete. December 29.
- . 2017. Letter Regarding Opinion on Proposed Cleanup of the Stoneway Concrete Renton Site. From Michael Warfel. To Jimmy Blais, Merlino Properties. August 31.



9.0 LIMITATIONS

9.1 GENERAL LIMITATIONS

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

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

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

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

9.2 LIMITATION ON RELIANCE BY THIRD PARTIES

Reliance by third parties is prohibited. This report/assessment has been prepared for the exclusive use of Maple Valley, LLC to address the unique needs of Maple Valley, LLC at the Old Stoneway Renton Property at a specific point in time.

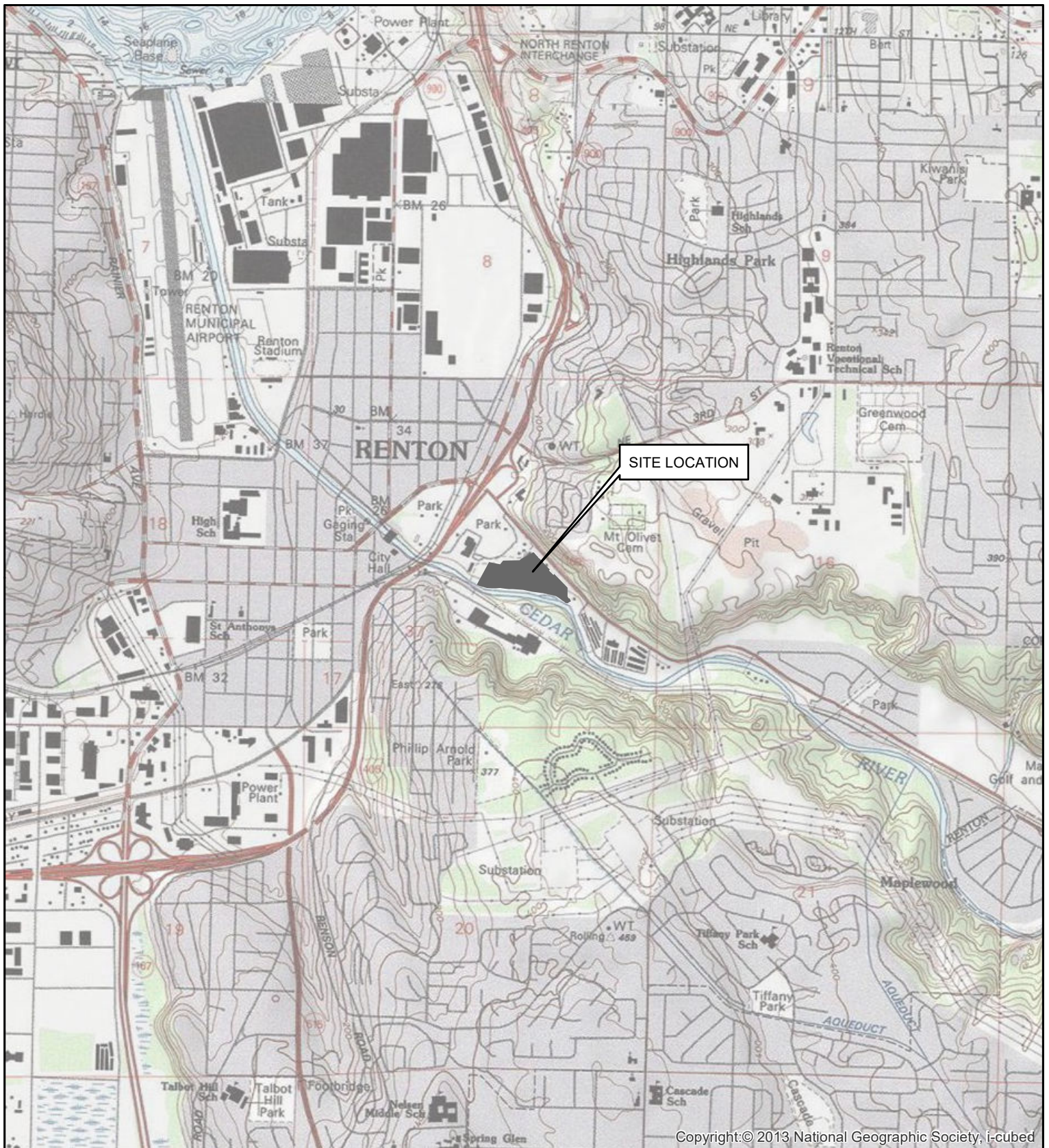
This is not a general grant of reliance. No one other than Maple Valley, LLC may rely on this report unless Farallon agrees in advance to such reliance in writing. Any unauthorized use, interpretation, or reliance on this report/assessment is at the sole risk of that party and Farallon will have no liability for such unauthorized use, interpretation, or reliance.

FIGURES

FOCUSED FEASIBILITY STUDY AND DISPROPORTIONATE COST ANALYSIS

**Old Stoneway Renton Property
1915 Southeast Maple Valley Highway
Renton, Washington**

Farallon PN: 266-008



REFERENCE: 7.5 MINUTE USGS QUADRANGLE RENTON, WASHINGTON, DATED 2011



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Washington
Issaquah | Bellingham | Seattle

Oregon
Portland | Bend | Baker City

California
Oakland | Sacramento | Irvine

FIGURE 1
SITE VICINITY MAP
OLD STONEWAY RENTON PROPERTY
1915 SOUTHEAST MAPLE VALLEY HIGHWAY
RENTON, WASHINGTON

FARALLON PN: 266-008

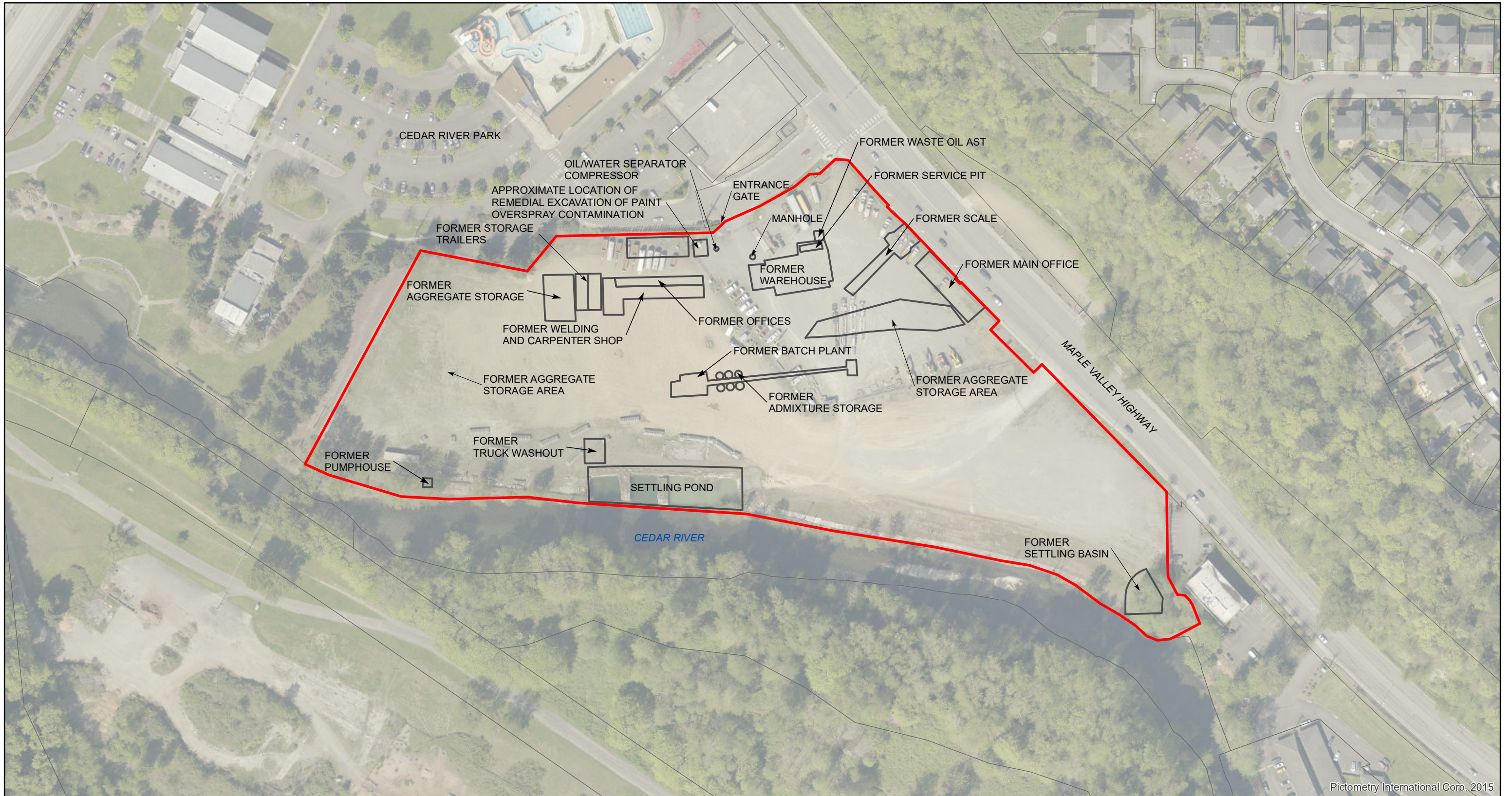
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Checked By: JR

Date: 2/13/2018

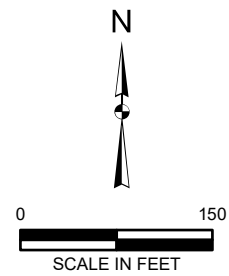
Disc Reference:

Document Path: Q:\Projects\266 Garv Merino\008 Old Stoney\FIGURE 1 SITE VICINITY MAP.mxd



Pictometry International Corp. 2015

- LEGEND**
- APPROXIMATE SITE BOUNDARY
 - HISTORICAL SITE FEATURES
 - KING COUNTY PARCEL BOUNDARY



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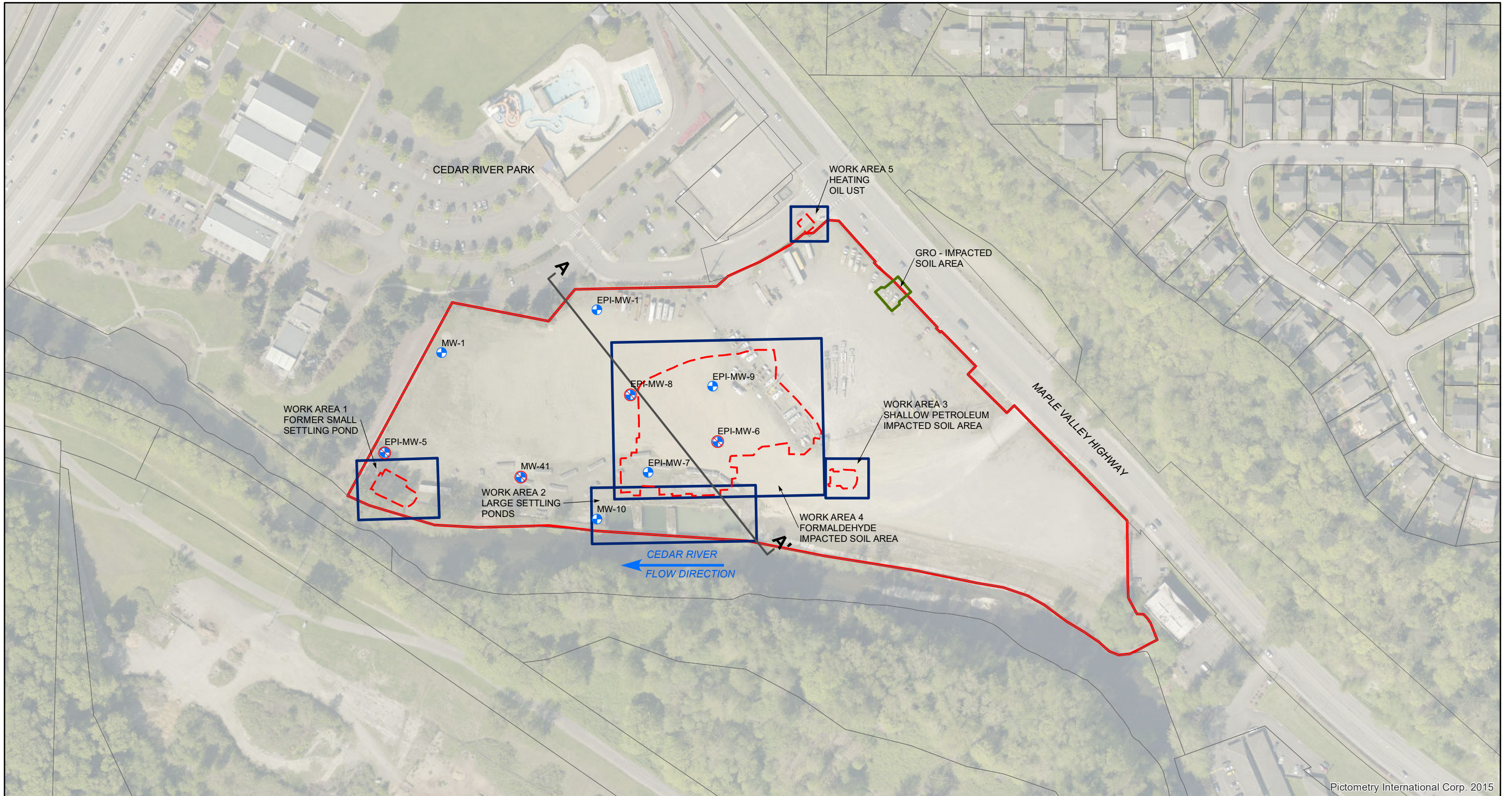
Washington
Issaquah | Bellingham | Seattle

Oregon
Portland | Bend | Baker City

California
Oakland | Sacramento | Irvine









FIGURE 2
HISTORICAL FEATURES
OLD STONEWAY RENTON PROPERTY
1915 SOUTHEAST MAPLE VALLEY HIGHWAY
RENTON, WASHINGTON

FARALLON PN: 266-008



Pictometry International Corp. 2015

LEGEND

-  MONITORING WELL (INSTALLED BY EPI AND OTHERS)
 -  ABANDONED MONITORING WELL
 -  CROSS-SECTION
 -  KING COUNTY PARCEL BOUNDARY
 -  APPROXIMATE SITE BOUNDARY
 -  INTERIM ACTION WORK AREA
 -  INTERIM ACTION EXCAVATION LIMITS (EPI)
 -  GASOLINE-RANGE ORGANIC (GRO) IMPACTED SOIL AREA.
- EPI = ENVIRONMENTAL PARTNERS, INC

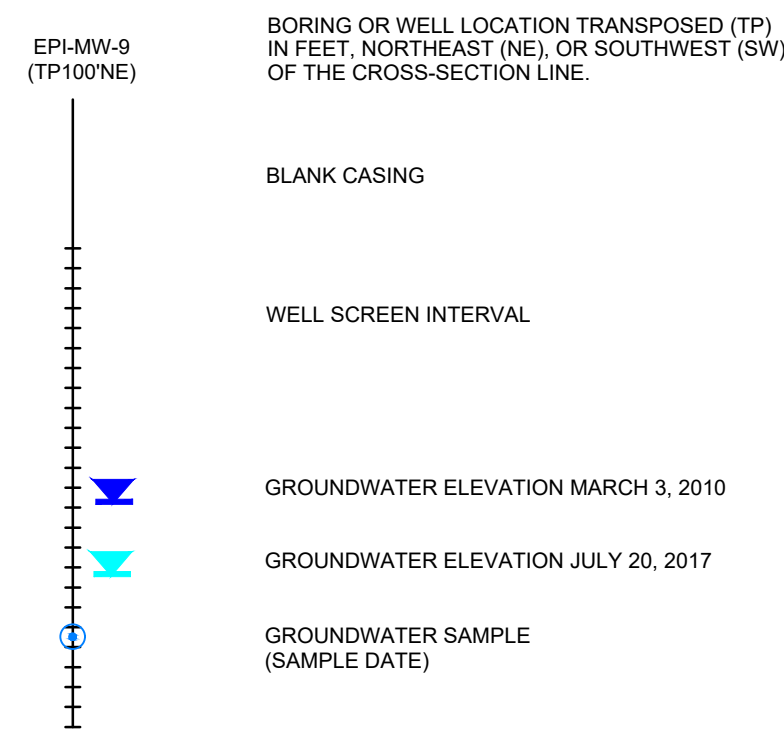
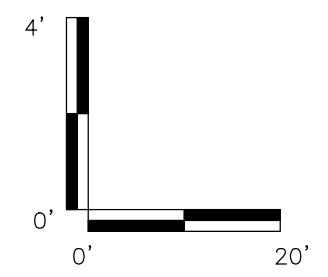
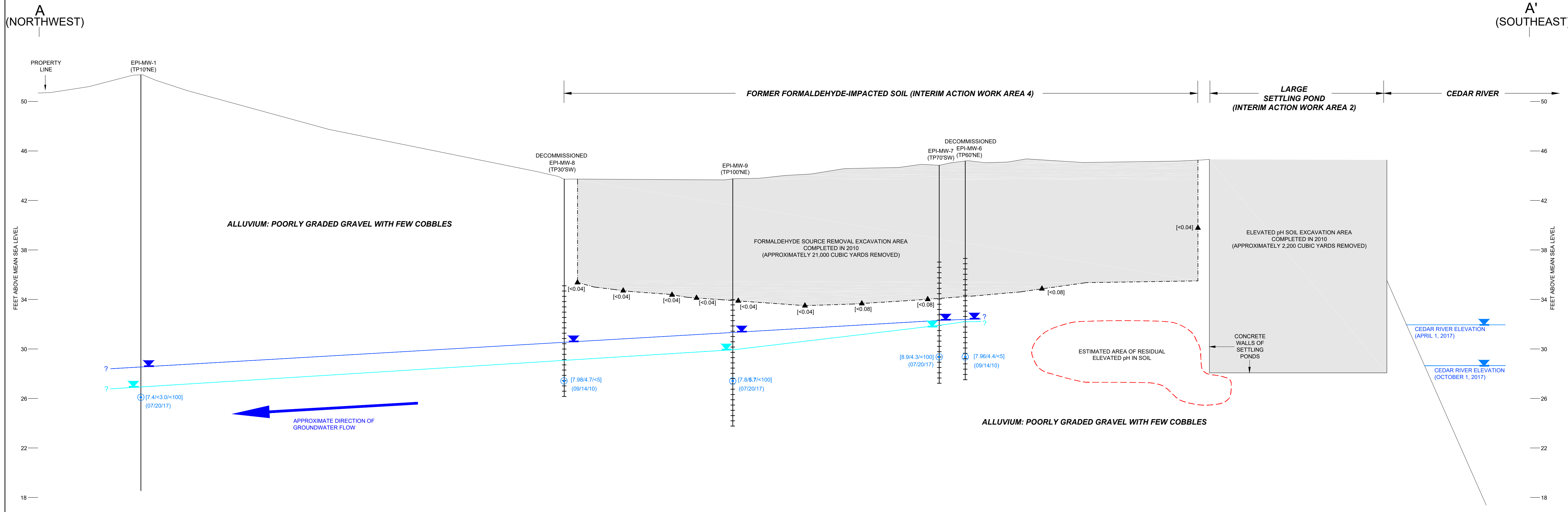


Washington
Issaquah | Bellingham | Seattle

Oregon
Portland | Bend | Baker City

California
Oakland | Sacramento | Irvine

FIGURE 3
INTERIM ACTION SITE PLAN
OLD STONEWAY RENTON PROPERTY
1915 SOUTHEAST MAPLE VALLEY HIGHWAY
RENTON, WASHINGTON



- ▲ FINAL CONFIRMATION SOIL SAMPLE FOR INTERIM ACTION REMEDIAL EXCAVATION
- [<0.04] SOIL ANALYTICAL RESULTS FOR FORMALDEHYDE IN MILLIGRAMS PER KILOGRAM
- [7.8/5.7<100] GROUNDWATER ANALYTICAL RESULTS FOR pH, DISSOLVED ARSENIC, FORMALDEHYDE IN MICROGRAMS PER LITER
- < INDICATES CONCENTRATIONS REPORTED NON-DETECT AT THE LABORATORY REPORTING LIMIT
- BOLD** = CONCENTRATIONS EXCEEDING APPLICABLE CLEANUP LEVELS
- = INTERIM ACTION EXCAVATION AREAS

NOTES:
 1.) CEDAR RIVER ELEVATIONS COLLECTED FROM UNITED STATES GEOLOGICAL SURVEY STREAM GAGE 12119000.
 2.) CEDAR RIVER ELEVATIONS COLLECTED FROM CLOSEST STREAM GAGE LOCATED DOWNRIVER FROM THE SITE.
 3.) NATIONAL GEODETIC VERTICAL OF 1929 DATUMS CONVERTED TO NORTH AMERICAN VERTICAL DATUMS OF 1988 USING VERTCON - NORTH AMERICAN VERTICAL DATUM CONVERSION.

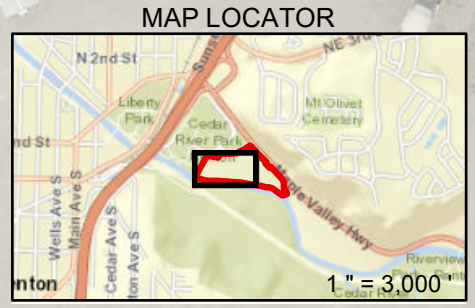
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FIGURE 4
 CROSS-SECTION A-A'
 OLD STONEWAY RENTON PROPERTY
 1915 SOUTHEAST MAPLE VALLEY HIGHWAY
 RENTON, WASHINGTON

FARALLON PN: 266-008

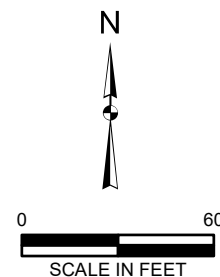
Washington: Issaquah | Bellingham | Seattle
 Oregon: Portland | Bend | Baker City
 California: Oakland | Sacramento | Irvine
 Drawn By: JJ Checked By: PK Date: 02/14/2018 Disk Reference: 266-008_a-a'



LEGEND

- MONITORING WELL (INSTALLED BY EPI AND OTHERS)
- ABANDONED MONITORING WELL
- APPROXIMATE SITE BOUNDARY

- 29.50 GROUNDWATER ELEVATION CONTOUR (DASHED WHERE INFERRED)
- GROUNDWATER FLOW DIRECTION
- (27.31) GROUNDWATER ELEVATION (7/20/17) MEASURED IN FEET ABOVE MEAN SEA LEVEL RELATIVE TO NORTH AMERICAN VERTICAL DATUM 1988 (MONITORING WELL SURVEY DATA PROVIDED BY EPI)
- (NC) GROUNDWATER ELEVATION NOT CALCULATED. MONITORING WELL SURVEY DATA WAS NOT AVAILABLE
- EPI = ENVIRONMENTAL PARTNERS, INC



Washington
Issaquah | Bellingham | Seattle

Oregon
Portland | Bend | Baker City

California
Oakland | Sacramento | Irvine

Quality Service for Environmental Solutions | farallonconsulting.com

Drawn By: tperrin Checked By: JR Date: 2/13/2018

FIGURE 5
GROUNDWATER ELEVATION CONTOURS AND FLOW DIRECTION FOR JULY 20, 2017
OLD STONEWAY RENTON PROPERTY
1915 SOUTHEAST MAPLE VALLEY HIGHWAY
RENTON, WASHINGTON

FARALLON PN: 266-008

| MW-1 | DATE | pH | DISSOLVED ARSENIC | FORMALDEHYDE |
|------|-----------|------|-------------------|--------------|
| | 1/23/2014 | 7.16 | 1.3 | NA |
| | 7/14/2014 | 6.88 | <1.0 | <1 |
| | 1/12/2015 | 6.59 | <1.0 | NA |
| | 4/13/2015 | 6.98 | 1.3 | <4 |
| | 7/20/2015 | 7.09 | <1.0 | <2 |
| | 9/15/2016 | 7.4 | <3.0 | <100 |
| | 4/21/2017 | 6.8 | <3.0 | <100 |
| | 7/20/2017 | 7.5 | <3.0 | <100 |

| EPI-MW-8 | DATE | pH | DISSOLVED ARSENIC | FORMALDEHYDE |
|----------|------------|------|-------------------|--------------|
| | 3/18/2009 | NA | NA | NA |
| | 6/8/2009 | 8.15 | <5 | <5 |
| | 9/29/2009 | 8.36 | 3.9 | 5 |
| | 12/14/2009 | 8.58 | 4.2 | <5 |
| | 3/3/2010 | 8.25 | 4.7 | <5 |
| | 6/1/2010 | 8.93 | 3.1 | <5 |
| | 9/14/2010 | 7.98 | 4.7 | <5 |

| EPI-MW-1 | DATE | pH | DISSOLVED ARSENIC | FORMALDEHYDE |
|----------|------------|------|-------------------|--------------|
| | 1/23/2014 | 7.14 | 1.5 | NA |
| | 7/14/2014 | 7.24 | 1.6 | <1 |
| | 1/12/2015 | 7.65 | <1.0 | NA |
| | 4/13/2015 | 6.6 | <1.0 | <4 |
| | 7/20/2015 | 6.96 | <1.0 | <2 |
| | 10/13/2015 | 6.52 | <1.0 | <100 |
| | 1/13/2016 | 7.09 | 1.3 | <100 |
| | 9/15/2016 | 7.3 | <3.0 | <100 |
| | 4/21/2017 | 7.0 | <3.0 | <100 |
| | 7/20/2017 | 7.4 | <3.0 | <100 |

| EPI-MW-9 | DATE | pH | DISSOLVED ARSENIC | FORMALDEHYDE |
|----------|-----------|------|-------------------|--------------|
| | 1/23/2014 | 7.3 | 5.9 | NA |
| | 7/14/2014 | 8.06 | 6.0 | <1 |
| | 1/12/2015 | 8.26 | 3.9 | <2 |
| | 4/13/2015 | 6.16 | 3.9 | <4 |
| | 7/20/2015 | 7.09 | 4.2 | <2 |
| | 9/15/2016 | 7.8 | 4.7 | <100 |
| | 4/21/2017 | 7.0 | 3.3 | <100 |
| | 7/20/2017 | 7.8 | 5.7 | <100 |

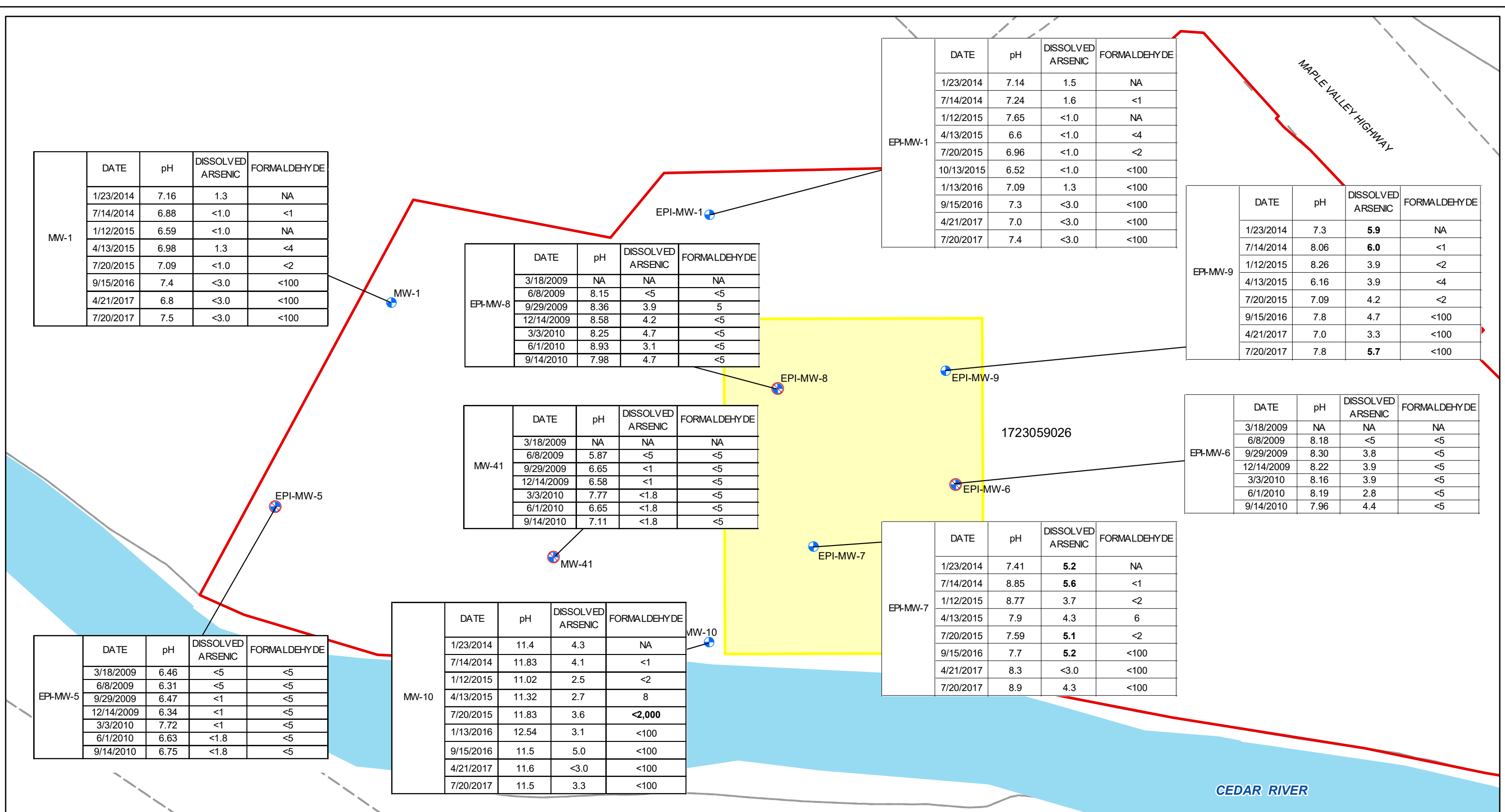
| MW-41 | DATE | pH | DISSOLVED ARSENIC | FORMALDEHYDE |
|-------|------------|------|-------------------|--------------|
| | 3/18/2009 | NA | NA | NA |
| | 6/8/2009 | 5.87 | <5 | <5 |
| | 9/29/2009 | 6.65 | <1 | <5 |
| | 12/14/2009 | 6.58 | <1 | <5 |
| | 3/3/2010 | 7.77 | <1.8 | <5 |
| | 6/1/2010 | 6.65 | <1.8 | <5 |
| | 9/14/2010 | 7.11 | <1.8 | <5 |

| EPI-MW-6 | DATE | pH | DISSOLVED ARSENIC | FORMALDEHYDE |
|----------|------------|------|-------------------|--------------|
| | 3/18/2009 | NA | NA | NA |
| | 6/8/2009 | 8.18 | <5 | <5 |
| | 9/29/2009 | 8.30 | 3.8 | <5 |
| | 12/14/2009 | 8.22 | 3.9 | <5 |
| | 3/3/2010 | 8.16 | 3.9 | <5 |
| | 6/1/2010 | 8.19 | 2.8 | <5 |
| | 9/14/2010 | 7.96 | 4.4 | <5 |

| EPI-MW-5 | DATE | pH | DISSOLVED ARSENIC | FORMALDEHYDE |
|----------|------------|------|-------------------|--------------|
| | 3/18/2009 | 6.46 | <5 | <5 |
| | 6/8/2009 | 6.31 | <5 | <5 |
| | 9/29/2009 | 6.47 | <1 | <5 |
| | 12/14/2009 | 6.34 | <1 | <5 |
| | 3/3/2010 | 7.72 | <1 | <5 |
| | 6/1/2010 | 6.63 | <1.8 | <5 |
| | 9/14/2010 | 6.75 | <1.8 | <5 |

| MW-10 | DATE | pH | DISSOLVED ARSENIC | FORMALDEHYDE |
|-------|-----------|-------|-------------------|------------------|
| | 1/23/2014 | 11.4 | 4.3 | NA |
| | 7/14/2014 | 11.83 | 4.1 | <1 |
| | 1/12/2015 | 11.02 | 2.5 | <2 |
| | 4/13/2015 | 11.32 | 2.7 | 8 |
| | 7/20/2015 | 11.83 | 3.6 | <2,000 |
| | 1/13/2016 | 12.54 | 3.1 | <100 |
| | 9/15/2016 | 11.5 | 5.0 | <100 |
| | 4/21/2017 | 11.6 | <3.0 | <100 |
| | 7/20/2017 | 11.5 | 3.3 | <100 |

| EPI-MW-7 | DATE | pH | DISSOLVED ARSENIC | FORMALDEHYDE |
|----------|-----------|------|-------------------|--------------|
| | 1/23/2014 | 7.41 | 5.2 | NA |
| | 7/14/2014 | 8.85 | 5.6 | <1 |
| | 1/12/2015 | 8.77 | 3.7 | <2 |
| | 4/13/2015 | 7.9 | 4.3 | 6 |
| | 7/20/2015 | 7.59 | 5.1 | <2 |
| | 9/15/2016 | 7.7 | 5.2 | <100 |
| | 4/21/2017 | 8.3 | <3.0 | <100 |
| | 7/20/2017 | 8.9 | 4.3 | <100 |



LEGEND

- MONITORING WELL (INSTALLED BY EPI AND OTHERS)
- ABANDONED MONITORING WELL
- APPROXIMATE SITE BOUNDARY
- ESTIMATED RESIDUAL ARSENIC IN GROUNDWATER
- KING COUNTY TAX PARCEL BOUNDARY AND IDENTIFIER NUMBER

NOTES:
DISSOLVED ARSENIC AND FORMALDEHYDE UNITS ARE IN MICROGRAMS PER LITER (µg/l)
pH AT 25 DEGREES CELSIUS

BOLD = DENOTES CONCENTRATIONS THAT EXCEED MODEL TOXICS CONTROL ACT (MTCA) CLEANUP LEVEL.
< = DENOTES ANALYTE NOT DETECTED AT OR EXCEEDING THE REPORTED LIMIT LISTED.
NA = NOT APPLICABLE
EPI = ENVIRONMENTAL PARTNERS, INC

N

0 80
SCALE IN FEET

Washington
Issaquah | Bellingham | Seattle

Oregon
Portland | Bend | Baker City

California
Oakland | Sacramento | Irvine

Quality Service for Environmental Solutions | farallonconsulting.com

Drawn By: tperrin Checked By: PK

FIGURE 6

GROUNDWATER ANALYTICAL RESULTS
OLD STONEWAY RENTON PROPERTY
1915 SOUTHEAST MAPLE VALLEY HIGHWAY
RENTON, WASHINGTON

FARALLON PN: 266-008

Date: 2/13/2018
Disc Reference: Q:\Projects\266 Gary Merlino\008 Old Stoneway\Figure 6 201707_gwAnalyticalData.mxd

TABLES

**FOCUSED FEASIBILITY STUDY AND DISPROPORTIONATE COST
ANALYSIS**

**Old Stoneway Renton Property
1915 Southeast Maple Valley Highway
Renton, Washington**

Farallon PN: 266-008

Table 1
Summary of Groundwater Elevation Data
Old Stoneway Renton Property
Renton, Washington
Farallon PN: 266-008

| Well Identification | Monitoring Date | Depth of Monitoring Well (feet) | Monitoring Well Screened Interval (feet bgs) | Wellhead Elevation ¹ (feet) | Depth to Water (below TOC) | Groundwater Elevation (feet) |
|----------------------------|------------------------|--|---|---|-----------------------------------|-------------------------------------|
| MW-1 | 6/8/2009 | NA | NA | 47.93 | 18.63 | 29.30 |
| | 9/29/2009 | | | | 19.62 | 28.31 |
| | 12/14/2009 | | | | 19.10 | 28.83 |
| | 3/3/2010 | | | | 18.58 | 29.35 |
| | 6/1/2010 | | | | 17.58 | 30.35 |
| | 8/10/2010 | | | | 20.78 | 27.15 |
| | 9/14/2010 | | | | 19.57 | 28.36 |
| | 9/15/2016 | | | | 19.91 | 28.02 |
| | 4/21/2017 | | | | 17.55 | 30.38 |
| | 7/20/2017 | | | | 20.62 | 27.31 |
| EPI-MW-1 | 6/8/2009 | NA | NA | 52.09 | 22.58 | 29.51 |
| | 9/29/2009 | | | | 23.48 | 28.61 |
| | 12/14/2009 | | | | 22.95 | 29.14 |
| | 3/3/2010 | | | | 22.53 | 29.56 |
| | 6/1/2010 | | | | 21.59 | 30.50 |
| | 8/10/2010 | | | | 24.45 | 27.64 |
| | 9/14/2010 | | | | 23.39 | 28.70 |
| | 9/15/2016 | | | | 23.71 | 28.38 |
| | 4/21/2017 | | | | 21.53 | 30.56 |
| | 7/20/2017 | | | | 24.37 | 27.72 |
| EPI-MW-5 | 6/8/2009 | NA | NA | 43.65 | 13.68 | 29.97 |
| | 9/29/2009 | | | | 15.75 | 27.90 |
| | 12/14/2009 | | | | 14.20 | 29.45 |
| | 3/3/2010 | | | | 13.80 | 29.85 |
| | 6/1/2010 | | | | 12.68 | 30.97 |
| | 8/10/2010 | | | | 15.56 | 28.09 |
| | 9/14/2010 | | | | 14.72 | 28.93 |
| EPI-MW-6 | 6/8/2009 | NA | NA | 46.18 | 14.29 | 31.89 |
| | 9/29/2009 | | | | 15.23 | 30.95 |
| | 12/14/2009 | | | | 14.77 | 31.41 |
| | 3/3/2010 | | | | 14.48 | 31.70 |
| | 6/1/2010 | | | | 13.25 | 32.93 |
| | 8/10/2010 | | | | 15.59 | 30.59 |
| | 9/14/2010 | | | | 15.13 | 31.05 |
| EPI-MW-7 | 6/8/2009 | 17.0 | 5.0-17.0 | 44.05 | 12.11 | 31.94 |
| | 9/29/2009 | | | | 13.03 | 31.02 |
| | 12/14/2009 | | | | 12.69 | 31.36 |
| | 3/3/2010 | | | | 12.25 | 31.80 |
| | 6/1/2010 | | | | 11.10 | 32.95 |
| | 8/10/2010 | | | | 13.44 | 30.61 |
| | 9/14/2010 | | | | 13.06 | 30.99 |
| | 9/15/2016 | | | | 13.23 | 30.82 |
| | 4/21/2017 | | | | 11.13 | 32.92 |
| | 7/20/2017 | | | | 13.25 | 30.80 |

Table 1
Summary of Groundwater Elevation Data
Old Stoneway Renton Property
Renton, Washington
Farallon PN: 266-008

| Well Identification | Monitoring Date | Depth of Monitoring Well (feet) | Monitoring Well Screened Interval (feet bgs) | Wellhead Elevation ¹ (feet) | Depth to Water (below TOC) | Groundwater Elevation (feet) |
|---------------------|-----------------|---------------------------------|--|--|----------------------------|------------------------------|
| EPI-MW-8 | 6/8/2009 | NA | NA | 45.82 | 15.35 | 30.47 |
| | 9/29/2009 | | | | 16.70 | 29.12 |
| | 12/14/2009 | | | | 15.81 | 30.01 |
| | 3/3/2010 | | | | 15.45 | 30.37 |
| | 6/1/2010 | | | | 14.40 | 31.42 |
| | 8/10/2010 | | | | 17.00 | 28.82 |
| | 9/14/2010 | | | | 16.22 | 29.60 |
| EPI-MW-9 | 6/8/2009 | 19.0 | 7.0-19.0 | 48.25 | 16.84 | 31.41 |
| | 9/29/2009 | | | | 17.95 | 30.30 |
| | 12/14/2009 | | | | 17.39 | 30.86 |
| | 3/3/2010 | | | | 17.08 | 31.17 |
| | 6/1/2010 | | | | 15.94 | 32.31 |
| | 8/10/2010 | | | | 18.31 | 29.94 |
| | 9/14/2010 | | | | 17.76 | 30.49 |
| | 9/15/2016 | | | | 18.32 | 29.93 |
| | 4/21/2017 | | | | 16.32 | 31.93 |
| | 7/20/2017 | | | | 18.50 | 29.75 |
| MW-10 | 7/20/2015 | NA | NA | NA | NA | 30.72 |
| | 1/13/2016 | | | | NA | 32.53 |
| | 9/15/2016 | | | | 11.51 | NC |
| | 4/21/2017 | | | | 9.49 | NC |
| | 7/20/2017 | | | | 11.40 | NC |
| MW-41 | 6/8/2009 | NA | NA | 41.41 | 10.61 | 30.80 |
| | 9/29/2009 | | | | 12.40 | 29.01 |
| | 12/14/2009 | | | | 11.16 | 30.25 |
| | 3/3/2010 | | | | 10.80 | 30.61 |
| | 6/1/2010 | | | | 9.64 | 31.77 |
| | 8/10/2010 | | | | 12.24 | 29.17 |
| | 9/14/2010 | | | | 11.60 | 29.81 |

NOTES

¹In feet at top of well casing. Monitoring well survey data obtained from *Interim Action Report, Volume 1, Former Stoneway Batch Plant, 1915 SE Maple Valley Highway, Renton, Washington* dated February 7, 2011, prepared by Environmental Partners, Inc.

bgs = below ground surface
 NA = not available
 NC = not calculated
 TOC = top of casing

Table 2
Summary of Groundwater Analytical Results
Old Stoneway Renton Property
Renton, Washington
Farallon PN: 266-008

| Sample Location | Sample Date | Sample Identification | Analytical Results | | |
|-----------------|-------------|-----------------------|---|--------------------------------|---------------------------|
| | | | pH (pH @ 25 degrees celsius) ¹ | (micrograms per liter) | |
| | | | | Dissolved Arsenic ² | Formaldehyde ³ |
| MW-1 | 3/18/2009 | MW-1 | 7.29 | <5 | <5 |
| | 6/8/2009 | MW-1 | 7.13 | <5 | <5 |
| | 9/29/2009 | MW-1 | 7.06 | <1 | 6 |
| | 12/14/2009 | MW-1 | 7.74 | 1.1 | <5 |
| | 3/3/2010 | MW-1 | 8.04 | <1.8 | <5 |
| | 6/1/2010 | MW-1 | 7.48 | <1.8 | <5 |
| | 9/14/2010 | MW-1 | 7.09 | <1.8 | <5 |
| | 12/14/2010 | Not Available | 7.80 | <1.8 | <5 |
| | 3/2/2011 | | 6.65 | <1.8 | <5 |
| | 5/15/2012 | | 6.60 | <1.0 | NA |
| | 10/9/2012 | | 6.27 | 1.0 | NA |
| | 4/23/2013 | | 7.36 | <1.0 | <5 |
| | 10/21/2013 | | 6.95 | <1.0 | NA |
| | 1/23/2014 | | 7.16 | 1.3 | NA |
| | 7/14/2014 | | 6.88 | <1.0 | <1 |
| | 1/12/2015 | | 6.59 | <1.0 | NA |
| | 4/13/2015 | | 6.98 | 1.3 | <4 |
| | 7/20/2015 | | 7.09 | <1.0 | <2 |
| | 10/13/2015 | | 6.55 | <1.0 | <100 |
| | 1/13/2015 | | 7.19 | <1.0 | <100 |
| | 9/15/2016 | MW-1-091516 | 7.4 | <3.0 | <100 |
| | 4/21/2017 | MW-1-042117 | 6.8 | <3.0 | <100 |
| | 7/20/2017 | MW-1-072017 | 7.5 | <3.0 | <100 |

Table 2
Summary of Groundwater Analytical Results
Old Stoneway Renton Property
Renton, Washington
Farallon PN: 266-008

| Sample Location | Sample Date | Sample Identification | Analytical Results | | |
|-----------------|-----------------|-----------------------|---|--------------------------------|---------------------------|
| | | | pH (pH @ 25 degrees celsius) ¹ | (micrograms per liter) | |
| | | | | Dissolved Arsenic ² | Formaldehyde ³ |
| EPI-MW-1 | 3/18/2009 | EPI MW-1 | 7.28 | <5 | <5 |
| | 6/8/2009 | EPI-MW-1 | 6.96 | <5 | <5 |
| | 9/29/2009 | EPI-MW-1 | 7.24 | 1.7 | <5 |
| | 12/14/2009 | EPI-MW-1 | 7.42 | 1.6 | <5 |
| | 3/3/2010 | EPI-MW-1 | 7.86 | 2.4 | <5 |
| | 6/1/2010 | EPI-MW-1 | 7.66 | <1.8 | <5 |
| | 9/14/2010 | EPI-MW-1 | 7.14 | 2.1 | <5 |
| | 12/14/2010 | Not Available | 7.58 | <1.8 | <5 |
| | 3/2/2011 | | 7.11 | 2.5 | <5 |
| | 5/15/2012 | | 6.94 | 1.1 | NA |
| | 10/9/2012 | | 6.43 | 1.4 | NA |
| | 4/23/2013 | | 7.64 | <1.0 | <5 |
| | 10/21/2013 | | 7.10 | 1.5 | NA |
| | 1/23/2014 | | 7.14 | 1.5 | NA |
| | 7/14/2014 | | 7.24 | 1.6 | <1 |
| | 1/12/2015 | | 7.65 | <1.0 | NA |
| | 4/13/2015 | | 6.60 | <1.0 | <4 |
| | 7/20/2015 | | 6.96 | <1.0 | <2 |
| | 10/13/2015 | | 6.52 | <1.0 | <100 |
| | 1/13/2016 | | 7.09 | 1.3 | <100 |
| 9/15/2016 | EPI-MW-1-091516 | 7.3 | <3.0 | <100 | |
| 4/21/2017 | EPI-MW-1-042117 | 7.0 | <3.0 | <100 | |
| 7/20/2017 | EPI-MW-1-072017 | 7.4 | <3.0 | <100 | |
| EPI-MW-5 | 3/18/2009 | EPI MW-5 | 6.46 | <5 | <5 |
| | 6/8/2009 | EPI-MW-5 | 6.31 | <5 | <5 |
| | 9/29/2009 | EPI-MW-5 | 6.47 | <1 | <5 |
| | 12/14/2009 | EPI-MW-5 | 6.34 | <1 | <5 |
| | 3/3/2010 | EPI-MW-5 | 7.72 | <1 | <5 |
| | 6/1/2010 | EPI-MW-5 | 6.63 | <1.8 | <5 |
| | 9/14/2010 | EPI-MW-5 | 6.75 | <1.8 | <5 |

Table 2
Summary of Groundwater Analytical Results
Old Stoneway Renton Property
Renton, Washington
Farallon PN: 266-008

| Sample Location | Sample Date | Sample Identification | Analytical Results | | |
|-----------------|-----------------|-----------------------|---|--------------------------------|---------------------------|
| | | | pH (pH @ 25 degrees celsius) ¹ | (micrograms per liter) | |
| | | | | Dissolved Arsenic ² | Formaldehyde ³ |
| EPI-MW-6 | 3/18/2009 | NS | NS | NS | NS |
| | 6/8/2009 | EPI-MW-6 | 8.18 | <5 | <5 |
| | 9/29/2009 | EPI-MW-6 | 8.30 | 3.8 | <5 |
| | 12/14/2009 | EPI-MW-6 | 8.22 | 3.9 | <5 |
| | 3/3/2010 | EPI-MW-6 | 8.16 | 3.9 | <5 |
| | 6/1/2010 | EPI-MW-6 | 8.19 | 2.8 | <5 |
| | 9/14/2010 | EPI-MW-6 | 7.96 | 4.4 | <5 |
| EPI-MW-7 | 3/18/2009 | NS | NS | NS | NS |
| | 6/8/2009 | EPI-MW-7 | 10.82 | 7 | <5 |
| | 9/29/2009 | EPI-MW-7 | 11.43 | 5.8 | <5 |
| | 12/14/2009 | EPI-MW-7 | 10.34 | 7.7 | <5 |
| | 3/3/2010 | EPI-MW-7 | 8.58 | 5.7 | <5 |
| | 6/1/2010 | EPI-MW-7 | 11.41 | 4.9 | 16 |
| | 9/14/2010 | EPI-MW-7 | 9.35 | 7.3 | <5 |
| | 12/14/2010 | Not Available | 9.33 | 4.8 | <5 |
| | 3/2/2011 | | 8.31 | 5.2 | <5 |
| | 1/27/2012 | | 9.40 | 5.9 | NA |
| | 5/15/2012 | | 8.45 | 5.7 | <6 |
| | 10/9/2012 | | 8.52 | 9.7 | <5 |
| | 1/17/2013 | | 7.65 | 6.5 | NA |
| | 4/23/2013 | | 9.05 | 4.2 | <5 |
| | 7/30/2013 | | 7.70 | 7.3 | NA |
| | 10/21/2013 | | 8.39 | 4.7 | <1 |
| | 1/23/2014 | | 7.41 | 5.2 | NA |
| | 7/14/2014 | | 8.85 | 5.6 | <1 |
| | 1/12/2015 | | 8.77 | 3.7 | <2 |
| | 4/13/2015 | | 7.90 | 4.3 | 6 |
| | 7/20/2015 | | 7.59 | 5.1 | <2 |
| | 10/13/2015 | | 8.85 | 4.2 | <100 |
| | 1/13/2016 | 7.73 | 3.9 | <100 | |
| 9/15/2016 | EPI-MW-7-091516 | 7.7 | 5.2 | <100 | |
| 4/21/2017 | EPI-MW-7-042117 | 8.3 | <3.0 | <100 | |
| 7/20/2017 | EPI-MW-7-072017 | 8.9 | 4.3 | <100 | |

Table 2
Summary of Groundwater Analytical Results
Old Stoneway Renton Property
Renton, Washington
Farallon PN: 266-008

| Sample Location | Sample Date | Sample Identification | Analytical Results | | |
|-----------------|-----------------|-----------------------|---|--------------------------------|---------------------------|
| | | | pH (pH @ 25 degrees celsius) ¹ | (micrograms per liter) | |
| | | | | Dissolved Arsenic ² | Formaldehyde ³ |
| EPI-MW-8 | 3/18/2009 | NS | NS | NS | NS |
| | 6/8/2009 | EPI-MW-8 | 8.15 | <5 | <5 |
| | 9/29/2009 | EPI-MW-8 | 8.36 | 3.9 | 5 |
| | 12/14/2009 | EPI-MW-8 | 8.58 | 4.2 | <5 |
| | 3/3/2010 | EPI-MW-8 | 8.25 | 4.7 | <5 |
| | 6/1/2010 | EPI-MW-8 | 8.93 | 3.1 | <5 |
| | 9/14/2010 | EPI-MW-8 | 7.98 | 4.7 | <5 |
| EPI-MW-9 | 3/18/2009 | NS | NS | NS | NS |
| | 6/8/2009 | EPI-MW-9 | 7.98 | 7 | <5 |
| | 9/29/2009 | EPI-MW-9 | 7.95 | 5.7 | <5 |
| | 12/14/2009 | EPI-MW-9 | 8.26 | 5.8 | <5 |
| | 3/3/2010 | EPI-MW-9 | 8.00 | 6.6 | <5 |
| | 6/1/2010 | EPI-MW-9 | 8.58 | 6.4 | 5 |
| | 9/14/2010 | EPI-MW-9 | 8.12 | 6.6 | <5 |
| | 12/14/2010 | Not Available | 8.23 | 6.3 | <5 |
| | 3/2/2011 | | 7.99 | 7.8 | <5 |
| | 1/27/2012 | | 9.25 | 6.6 | NA |
| | 5/15/2012 | | 7.22 | 8.1 | NA |
| | 10/9/2012 | | 7.47 | 7.6 | <5 |
| | 1/17/2013 | | 8.83 | 6.6 | NA |
| | 4/23/2013 | | 8.53 | 5.9 | <5 |
| | 7/30/2013 | | 8.42 | 7.5 | NA |
| | 10/21/2013 | | 8.18 | 6.6 | <1 |
| | 1/23/2014 | | 7.30 | 5.9 | NA |
| | 7/14/2014 | | 8.06 | 6.0 | <1 |
| | 1/12/2015 | | 8.26 | 3.9 | <2 |
| | 4/13/2015 | | 6.16 | 3.9 | <4 |
| | 7/20/2015 | | 7.09 | 4.2 | <2 |
| | 10/13/2016 | | 7.26 | 4.2 | <100 |
| | 1/13/2016 | 7.24 | 3.1 | <100 | |
| 9/15/2016 | EPI-MW-9-091516 | 7.8 | 4.7 | <100 | |
| 4/21/2017 | EPI-MW-9-042117 | 7.0 | 3.3 | <100 | |
| 7/20/2017 | EPI-MW-9-072017 | 7.8 | 5.7 | <100 | |

Table 2
Summary of Groundwater Analytical Results
Old Stoneway Renton Property
Renton, Washington
Farallon PN: 266-008

| Sample Location | Sample Date | Sample Identification | Analytical Results | | | |
|--|-------------|-----------------------|---|--------------------------------|---------------------------|------|
| | | | pH (pH @ 25 degrees celsius) ¹ | (micrograms per liter) | | |
| | | | | Dissolved Arsenic ² | Formaldehyde ³ | |
| MW-10 | 9/29/2009 | EPI-MW-10 | NA | 6.2 | <5 | |
| | 12/14/2009 | EPI-MW-10 | NA | 7.7 | <5 | |
| | 3/3/2010 | EPI-MW-10 | NA | 4.0 | <5 | |
| | 6/1/2010 | EPI-MW-10 | NA | 4.8 | 18 | |
| | 9/14/2010 | EPI-MW-10 | NA | 7.1 | <5 | |
| | 1/9/2012 | Not Available | 10.27 | 17 | <5 | |
| | 1/17/2013 | | 11.94 | 6.8 | NA | |
| | 4/23/2013 | | 11.44 | 3.8 | <5 | |
| | 7/30/2013 | | 11.36 | 5.9 | NA | |
| | 10/21/2013 | | 11.69 | 6.0 | <1 | |
| | 1/23/2014 | | 11.40 | 4.3 | NA | |
| | 7/14/2014 | | 11.83 | 4.1 | <1 | |
| | 1/12/2015 | | 11.02 | 2.5 | <2 | |
| | 4/13/2015 | | 11.32 | 2.7 | 8 | |
| | 7/20/2015 | | 11.83 | 3.6 | <2000 | |
| | 1/13/2016 | | 12.54 | 3.1 | <100 | |
| | 9/15/2016 | | MW-10-091516 | 11.5 | 5.0 | <100 |
| | 4/21/2017 | | EPI-MW-10-042117 | 11.6 | <3.0 | <100 |
| | 7/20/2017 | MW-10-072017 | 11.5 | 3.3 | <100 | |
| MW-41 | 3/18/2009 | NS | NS | NS | NS | |
| | 6/8/2009 | MW-41 | 5.87 | <5 | <5 | |
| | 9/29/2009 | MW-41 | 6.65 | <1 | <5 | |
| | 12/14/2009 | MW-41 | 6.58 | <1 | <5 | |
| | 3/3/2010 | MW-41 | 7.77 | <1.8 | <5 | |
| | 6/1/2010 | MW-41 | 6.65 | <1.8 | <5 | |
| | 9/14/2010 | MW-41 | 7.11 | <1.8 | <5 | |
| MTCA Cleanup Levels for Groundwater | | | NA | 5⁴ | 1,600⁵ | |

NOTES:

< denotes analyte not detected at or exceeding the laboratory practical quantitation limit listed.
 Results in **bold** denote concentrations exceeding applicable cleanup levels.

NA = not analyzed
 NS = not sampled

¹Analyzed by SM 4500-HB.

²Analyzed by U.S. Environmental Protection Agency Methods 200.8 or 7060.

³Analyzed by U.S. Environmental Protection Agency Method 8315A.

⁴Washington State Model Toxics Control Act Cleanup Regulation (MTCA) Method A Cleanup Levels for Groundwater, Table 720-1 of Section 900 of Chapter 173-340 of the Washington Administrative Code, as revised November 2007, unless otherwise noted.

⁵Washington State Model Toxics Control Act Cleanup Regulation Cleanup Levels and Risk Calculations, Standard Method B Values for Groundwater, <https://fortress.wa.gov/ecy/clarc/CLARCHome.aspx>.

Table 3
Remediation Technology Screening
Old Stoneway Renton Property
Renton, Washington
Farallon PN: 266-008

| Technology as Cleanup Alternatives | Process Option | | Score | | | | Rank | Retain? |
|------------------------------------|-----------------------------|---|------------------|---------------|------|-------|------|---------|
| | | | Implementability | Effectiveness | Cost | Total | | |
| No Remedial Action | Natural Attenuation | None | 4 | 1 | 4 | 9 | 3 | Y |
| Institutional Controls | Legal Deed Covenant | Site use restrictions, construction requirements, and health advisories | 4 | 2 | 4 | 10 | 2 | Y |
| Ex-Situ Process | In-Situ Chemical/Biological | Ion exchange | 1 | 2 | 1 | 4 | 7 | N |
| | In-Situ Chemical | Reverse osmosis | 1 | 2 | 2 | 5 | 6 | N |
| In-Situ Process | In-Situ Chemical | Soil mixing | 2 | 1 | 3 | 6 | 5 | N |
| | In-Situ Physical | Vapor Barrier and Subslab Depressurization System (residual soil contamination) | 4 | 4 | 4 | 12 | 1 | N |
| Excavation and Off-Site Recycling | Ex-Situ Physical | Facility that can accept soil with elevated pH | 1 | 4 | 1 | 6 | 4 | Y |

NOTES:

Scores = 1 least favorable, 4 most favorable.

Rank = Relative position to other technologies based on total score.

Total Score = Sum of individual scores for implementability, effectiveness, and cost.

Y/Bold = Retained for consideration in alternative(s).

N = Not retained for consideration in alternative(s).

COCs = contaminants of concern

Table 4
Evaluation of Cleanup Action Alternatives
Old Stoneway Renton Property
Renton, Washington
Farallon PN: 266-008

| | Alternative 1 - No Remedial Action | Alternative 2 - Excavation and Off-Site Recycling and Compliance Groundwater Monitoring | Alternative 3 - Institutional Controls and Compliance Groundwater Monitoring |
|--|--|--|---|
| Description | No further action; assumes MNA for residual groundwater contamination. | Excavation and off-Site disposal of all soil with elevated pH. Additional permitting, shoring, and hydraulic control costs will be necessary to divert the Cedar River. Institutional controls potentially will still be necessary if arsenic concentrations in groundwater do not decrease. | Implementation of institutional controls (Environmental Covenant) for the Site and compliance groundwater monitoring. |
| Threshold Requirements | | | |
| Protection of Human Health and the Environment | No - Alternative will not protect human health and the environment. | Yes - Alternative will protect human health and the environment. | Yes - Alternative will protect human health and the environment. |
| Compliance with Cleanup Standards | No - Alternative does not comply with cleanup standards. | Yes - Cleanup levels will not be met in groundwater at the Site in the short term. Compliance groundwater monitoring will be required to demonstrate that removal of soil with elevated pH decreases arsenic concentrations in groundwater. | Yes - Cleanup levels will not be met in groundwater at the Site in the short term. Institutional controls, including an Environmental Covenant, will be required at the Site to ensure maintenance and continued compliance monitoring of groundwater. |
| Compliance with Applicable State and Federal Laws | No - Alternative does not comply with applicable laws. | Yes - Alternative complies with applicable laws. | Yes - Alternative complies with applicable laws. |
| Provision for Compliance Monitoring | Yes - Alternative includes provisions for compliance monitoring. | Yes - Alternative includes provisions for a compliance groundwater monitoring program. | Yes - Alternative includes provisions for a compliance groundwater monitoring program. |
| Other Requirements | | | |
| Permanent to the Maximum Extent Practicable (see detail below) | No - Alternative is not permanent to the maximum extent practicable. | Yes - Removal of soil with remaining soil with elevated soil pH will result in a permanent solution for the Site. | Yes - Institutional controls in the form of an Environmental Covenant will be placed on the Site to maintain protection of human health and the environment and to ensure ongoing compliance groundwater monitoring. |
| Reasonable Restoration Time Frame | Restoration time frame is long. | Restoration time frame is reasonable following removal of soil. Compliance groundwater monitoring will still be required to evaluate the effectiveness of the soil removal. | Restoration time frame is reasonable following removal of soil. Compliance groundwater monitoring will still be required to evaluate the effectiveness of the soil removal. |
| Project-Specific Requirement: Environmental Risk from Work in the Cedar River | No - Alternative does not present an environmental risk to the Cedar River. | Yes - Alternative presents a high risk to the Cedar River. Alternative assumes extensive permitting, shoring, and hydraulic control to protect human health and the environment. | No - Alternative does not present an environmental risk to the Cedar River. |

Table 4
Evaluation of Cleanup Action Alternatives
Old Stoneway Renton Property
Renton, Washington
Farallon PN: 266-008

| | Alternative 1 - No Remedial Action | Alternative 2 - Excavation and Off-Site Recycling and Compliance Groundwater Monitoring | Alternative 3 - Institutional Controls and Compliance Groundwater Monitoring |
|---|---|--|---|
| Evaluation Criteria for Permanence to the Maximum Extent Practicable | | | |
| Protectiveness (30% Weighted Factor) | Alternative will be least protective for the Site. = 1. | Alternative will achieve overall protection for the Site. = 10. | Alternative will achieve overall protection for the Site. = 8. |
| Permanence (20% Weighted Factor) | Alternative is not permanent. = 1. | Removal of remaining impacted soil will most likely result in a permanent solution for the Site. An institutional control may still be necessary if arsenic concentrations don't decrease in groundwater. = 9. | Institutional controls in the form of and Environmental Covenant will be placed on the Site. = 8. |
| Long-Term Effectiveness (20% Weighted Factor) | Alternative is not effective over the long term. = 1. | Alternative results in the removal of soil with elevated pH. = 10. | Alternative places control measures on the soil and groundwater though the use of institutional controls. = 8. |
| Short-Term Risk Management (10% Weighted Factor) | Alternative does nothing to mitigate the presence of soil with elevated soil pH. No remedial action would pose limited short-term risk management concerns. = 8. | Alternative removes soil with elevated pH; additional permitting, shoring, and hydraulic controls would pose a high short-term risk. = 2. | Alternative removes short-term risk by eliminating the requirement for further permitting, shoring, and hydraulic control activities. = 10. |
| Technical and Administrative Implementability (10% Weighted Factor) | Alternative requires no additional technical implementation restrictions but poses some administration implementability concerns because COCs in soil would be left in place with no additional remedial action. = 5. | Alternative poses significant technical implementability concerns regarding the additional permitting, shoring, hydraulic control, and soil excavation. = 1. | Institutional controls are technically and administratively feasible for the Property = 10. |
| Public Concerns (10% Weighted Factor) | Alternative does not remove or mitigate remaining soil with elevated pH, which would pose some public concerns long-term = 2. | Alternative removes soil with elevated pH. Alternative presents significant additional public concerns due to extensive permitting, shoring, and hydraulic control that would be required due to work required in the adjacent Cedar River. = 1. | Alternative puts institutional controls on the Site; public concern is addressed through groundwater compliance monitoring and institutional controls. = 9. |
| MTCA Composite Benefit Score¹ | 2.1 | 7.6 | 8.4 |
| Estimated Cost | \$25,000 | \$1,050,000 | \$150,000 |

NOTES:

¹ Basis for overall Washington State Model Toxics Control Act Cleanup Regulation (MTCA) Composite Benefit Score provided 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 above. MTCA Composite Benefit Scores are calculated by summing the mathematical product of the score multiplied by the indicated weighting factor for each of the six criteria. The basis for the weighting factors for the six criteria to evaluate permanence to the maximum extent practicable are obtained from Washington State Department of Ecology guidance cited in the text.

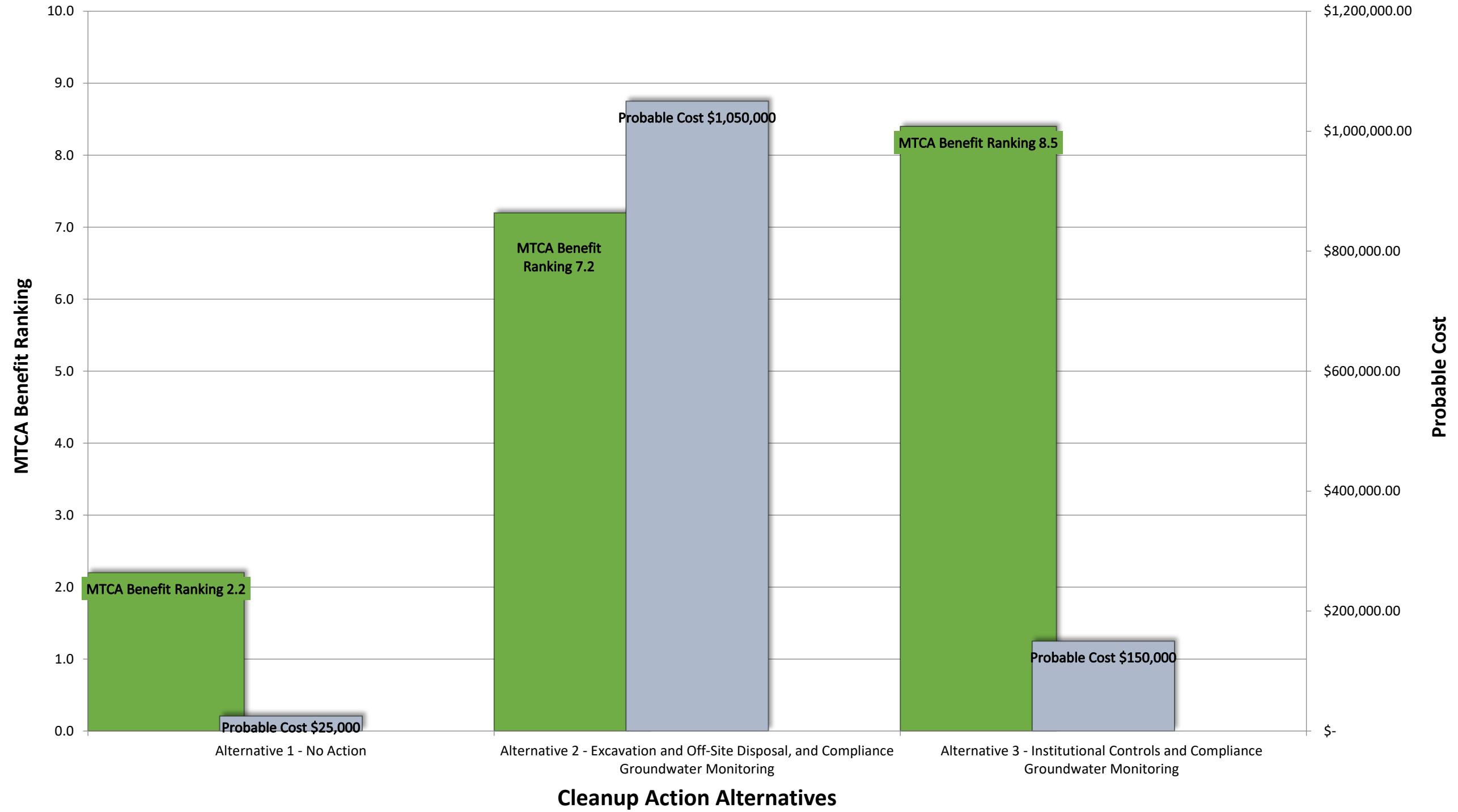
CHART

**FOCUSED FEASIBILITY STUDY AND DISPROPORTIONATE COST
ANALYSIS**

**Old Stoneway Renton Property
1915 Southeast Maple Valley Highway
Renton, Washington**

Farallon PN: 266-008

**Chart 1
 Disproportionate Cost Analysis Rankings
 Old Stoneway Renton Property
 Renton, Washington
 Farallon PN: 266-008**



APPENDIX A
LABORATORY ANALYTICAL REPORTS, 2016 – 2017

**FOCUSED FEASIBILITY STUDY AND DISPROPORTIONATE COST
ANALYSIS**

Old Stoneway Renton Property
1915 Southeast Maple Valley Highway
Renton, Washington

Farallon PN: 266-008



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

September 29, 2016

Javan Ruark
Farallon Consulting, LLC
975 5th Avenue NW
Issaquah, WA 98027

Re: Analytical Data for Project 266-008
Laboratory Reference No. 1609-192

Dear Javan:

Enclosed are the analytical results and associated quality control data for samples submitted on September 16, 2016.

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

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

Sincerely,

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

David Baumeister
Project Manager

Enclosures



OnSite Environmental, Inc. 14648 NE 95th Street, Redmond, WA 98052 (425) 883-3881

This report pertains to the samples analyzed in accordance with the chain of custody, and is intended only for the use of the individual or company to whom it is addressed.

Date of Report: September 29, 2016
Samples Submitted: September 16, 2016
Laboratory Reference: 1609-192
Project: 266-008

Case Narrative

Samples were collected on September 15, 2016 and received by the laboratory on September 16, 2016. They were maintained at the laboratory at a temperature of 2°C to 6°C.

Please note that any and all soil sample results are reported on a dry-weight basis, unless otherwise noted below.

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



Date of Report: September 29, 2016
 Samples Submitted: September 16, 2016
 Laboratory Reference: 1609-192
 Project: 266-008

pH
SM 4500-H B

Matrix: Water
 Units: pH (@ 25°C)

| Analyte | Result | Method | Date Prepared | Date Analyzed | Flags |
|-------------------|------------------------|-------------|---------------|---------------|-------|
| Client ID: | EP1-MW-7-091516 | | | | |
| Laboratory ID: | 09-192-01 | | | | |
| pH | 7.7 | SM 4500-H B | 9-16-16 | 9-16-16 | |
| Client ID: | MW-10-091516 | | | | |
| Laboratory ID: | 09-192-02 | | | | |
| pH | 11.5 | SM 4500-H B | 9-16-16 | 9-16-16 | |
| Client ID: | MW-1-091516 | | | | |
| Laboratory ID: | 09-192-03 | | | | |
| pH | 7.4 | SM 4500-H B | 9-16-16 | 9-16-16 | |
| Client ID: | EP1-MW-9-091516 | | | | |
| Laboratory ID: | 09-192-04 | | | | |
| pH | 7.8 | SM 4500-H B | 9-16-16 | 9-16-16 | |
| Client ID: | EP1-MW-1-091516 | | | | |
| Laboratory ID: | 09-192-05 | | | | |
| pH | 7.3 | SM 4500-H B | 9-16-16 | 9-16-16 | |



Date of Report: September 29, 2016
 Samples Submitted: September 16, 2016
 Laboratory Reference: 1609-192
 Project: 266-008

**DISSOLVED ARSENIC
 EPA 200.8**

Matrix: Water
 Units: ug/L (ppb)

| Analyte | Result | PQL | EPA Method | Date Prepared | Date Analyzed | Flags |
|-------------------|------------------------|------------|-------------------|----------------------|----------------------|--------------|
| Lab ID: | 09-192-01 | | | | | |
| Client ID: | EP1-MW-7-091516 | | | | | |
| Arsenic | 5.2 | 3.0 | 200.8 | 9-16-16 | 9-21-16 | |
| Lab ID: | 09-192-02 | | | | | |
| Client ID: | MW-10-091516 | | | | | |
| Arsenic | 5.0 | 3.0 | 200.8 | 9-16-16 | 9-21-16 | |
| Lab ID: | 09-192-03 | | | | | |
| Client ID: | MW-1-091516 | | | | | |
| Arsenic | ND | 3.0 | 200.8 | 9-16-16 | 9-21-16 | |
| Lab ID: | 09-192-04 | | | | | |
| Client ID: | EP1-MW-9-091516 | | | | | |
| Arsenic | 4.7 | 3.0 | 200.8 | 9-16-16 | 9-21-16 | |
| Lab ID: | 09-192-05 | | | | | |
| Client ID: | EP1-MW-1-091516 | | | | | |
| Arsenic | ND | 3.0 | 200.8 | 9-16-16 | 9-21-16 | |



Date of Report: September 29, 2016
Samples Submitted: September 16, 2016
Laboratory Reference: 1609-192
Project: 266-008

**DISSOLVED ARSENIC
EPA 200.8
METHOD BLANK QUALITY CONTROL**

Date Filtered: 9-16-16
Date Analyzed: 9-21-16

Matrix: Water
Units: ug/L (ppb)

Lab ID: MB0916F1

| Analyte | Method | Result | PQL |
|---------|--------|-----------|-----|
| Arsenic | 200.8 | ND | 3.0 |



Date of Report: September 29, 2016
Samples Submitted: September 16, 2016
Laboratory Reference: 1609-192
Project: 266-008

**DISSOLVED ARSENIC
EPA 200.8
DUPLICATE QUALITY CONTROL**

Date Filtered: 9-16-16
Date Analyzed: 9-21-16

Matrix: Water
Units: ug/L (ppb)

Lab ID: 09-178-04

| Analyte | Sample Result | Duplicate Result | RPD | PQL | Flags |
|---------|---------------|------------------|-----|-----|-------|
| Arsenic | 7.35 | 6.75 | 9 | 3.0 | |



Date of Report: September 29, 2016
 Samples Submitted: September 16, 2016
 Laboratory Reference: 1609-192
 Project: 266-008

**DISSOLVED ARSENIC
 EPA 200.8
 MS/MSD QUALITY CONTROL**

Date Filtered: 9-16-16

Date Analyzed: 9-21-16

Matrix: Water

Units: ug/L (ppb)

Lab ID: 09-178-04

| Analyte | Spike Level | MS | Percent Recovery | MSD | Percent Recovery | RPD | Flags |
|---------|-------------|------------|------------------|------------|------------------|-----|-------|
| Arsenic | 200 | 211 | 102 | 226 | 109 | 7 | |





Data Qualifiers and Abbreviations

- A - Due to a high sample concentration, the amount spiked is insufficient for meaningful MS/MSD recovery data.
 - B - The analyte indicated was also found in the blank sample.
 - C - The duplicate RPD is outside control limits due to high result variability when analyte concentrations are within five times the quantitation limit.
 - E - The value reported exceeds the quantitation range and is an estimate.
 - F - Surrogate recovery data is not available due to the high concentration of coeluting target compounds.
 - H - The analyte indicated is a common laboratory solvent and may have been introduced during sample preparation, and be impacting the sample result.
 - I - Compound recovery is outside of the control limits.
 - J - The value reported was below the practical quantitation limit. The value is an estimate.
 - K - Sample duplicate RPD is outside control limits due to sample inhomogeneity. The sample was re-extracted and re-analyzed with similar results.
 - L - The RPD is outside of the control limits.
 - M - Hydrocarbons in the gasoline range are impacting the diesel range result.
 - M1 - Hydrocarbons in the gasoline range (toluene-naphthalene) are present in the sample.
 - N - Hydrocarbons in the lube oil range are impacting the diesel range result.
 - N1 - Hydrocarbons in diesel range are impacting lube oil range results.
 - O - Hydrocarbons indicative of heavier fuels are present in the sample and are impacting the gasoline result.
 - P - The RPD of the detected concentrations between the two columns is greater than 40.
 - Q - Surrogate recovery is outside of the control limits.
 - S - Surrogate recovery data is not available due to the necessary dilution of the sample.
 - T - The sample chromatogram is not similar to a typical _____.
 - U - The analyte was analyzed for, but was not detected above the reported sample quantitation limit.
 - U1 - The practical quantitation limit is elevated due to interferences present in the sample.
 - V - Matrix Spike/Matrix Spike Duplicate recoveries are outside control limits due to matrix effects.
 - W - Matrix Spike/Matrix Spike Duplicate RPD are outside control limits due to matrix effects.
 - X - Sample extract treated with a mercury cleanup procedure.
 - X1 - Sample extract treated with a Sulfuric acid/Silica gel cleanup procedure.
 - Y - The calibration verification for this analyte exceeded the 20% drift specified in method 8260C, and therefore the reported result should be considered an estimate. The overall performance of the calibration verification standard met the acceptance criteria of the method.
 - Z -
- ND - Not Detected at PQL
 PQL - Practical Quantitation Limit
 RPD - Relative Percent Difference





ALS Environmental
ALS Group USA, Corp
1317 South 13th Avenue
Kelso, WA 98626
T : +1 360 577 7222
F : +1 360 636 1068
www.alsglobal.com

September 29, 2016

Analytical Report for Service Request No: K1611027

Blair Goodrow
Onsite Environmental Incorporated
14648 NE 95th Street
Redmond, WA 98052

RE: Stoneway Concrete / 266-008

Dear Blair,

Enclosed are the results of the sample(s) submitted to our laboratory September 17, 2016
For your reference, these analyses have been assigned our service request number **K1611027**.

Analyses were performed according to our laboratory's NELAP-approved quality assurance program. The test results meet requirements of the current NELAP standards, where applicable, and except as noted in the laboratory case narrative provided. For a specific list of NELAP-accredited analytes, refer to the certifications section at www.alsglobal.com. All results are intended to be considered in their entirety, and ALS Group USA Corp. dba ALS Environmental (ALS) is not responsible for use of less than the complete report. Results apply only to the items submitted to the laboratory for analysis and individual items (samples) analyzed, as listed in the report.

Please contact me if you have any questions. My extension is 3364. You may also contact me via email at howard.holmes@alsglobal.com.

Respectfully submitted,

ALS Group USA, Corp. dba ALS Environmental

Howard Holmes
Project Manager



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www.alsglobal.com

Table of Contents

Acronyms

Qualifiers

State Certifications, Accreditations, And Licenses

Chain of Custody

Carbonyls by High Performance Liquid Chromatography

Acronyms

| | |
|------------|--|
| ASTM | American Society for Testing and Materials |
| A2LA | American Association for Laboratory Accreditation |
| CARB | California Air Resources Board |
| CAS Number | Chemical Abstract Service registry Number |
| CFC | Chlorofluorocarbon |
| CFU | Colony-Forming Unit |
| DEC | Department of Environmental Conservation |
| DEQ | Department of Environmental Quality |
| DHS | Department of Health Services |
| DOE | Department of Ecology |
| DOH | Department of Health |
| EPA | U. S. Environmental Protection Agency |
| ELAP | Environmental Laboratory Accreditation Program |
| GC | Gas Chromatography |
| GC/MS | Gas Chromatography/Mass Spectrometry |
| LOD | Limit of Detection |
| LOQ | Limit of Quantitation |
| LUFT | Leaking Underground Fuel Tank |
| M | Modified |
| MCL | Maximum Contaminant Level is the highest permissible concentration of a substance allowed in drinking water as established by the USEPA. |
| MDL | Method Detection Limit |
| MPN | Most Probable Number |
| MRL | Method Reporting Limit |
| NA | Not Applicable |
| NC | Not Calculated |
| NCASI | National Council of the Paper Industry for Air and Stream Improvement |
| ND | Not Detected |
| NIOSH | National Institute for Occupational Safety and Health |
| PQL | Practical Quantitation Limit |
| RCRA | Resource Conservation and Recovery Act |
| SIM | Selected Ion Monitoring |
| TPH | Total Petroleum Hydrocarbons |
| tr | Trace level is the concentration of an analyte that is less than the PQL but greater than or equal to the MDL. |

Inorganic Data Qualifiers

- * The result is an outlier. See case narrative.
- # The control limit criteria is not applicable. See case narrative.
- B The analyte was found in the associated method blank at a level that is significant relative to the sample result as defined by the DOD or NELAC standards.
- E The result is an estimate amount because the value exceeded the instrument calibration range.
- J The result is an estimated value.
- U The analyte was analyzed for, but was not detected ("Non-detect") at or above the MRL/MDL.
DOD-QSM 4.2 definition : Analyte was not detected and is reported as less than the LOD or as defined by the project. The detection limit is adjusted for dilution.
- i The MRL/MDL or LOQ/LOD is elevated due to a matrix interference.
- X See case narrative.
- Q See case narrative. One or more quality control criteria was outside the limits.
- H The holding time for this test is immediately following sample collection. The samples were analyzed as soon as possible after receipt by the laboratory.

Metals Data Qualifiers

- # The control limit criteria is not applicable. See case narrative.
- J The result is an estimated value.
- E The percent difference for the serial dilution was greater than 10%, indicating a possible matrix interference in the sample.
- M The duplicate injection precision was not met.
- N The Matrix Spike sample recovery is not within control limits. See case narrative.
- S The reported value was determined by the Method of Standard Additions (MSA).
- U The analyte was analyzed for, but was not detected ("Non-detect") at or above the MRL/MDL.
DOD-QSM 4.2 definition : Analyte was not detected and is reported as less than the LOD or as defined by the project. The detection limit is adjusted for dilution.
- W The post-digestion spike for furnace AA analysis is out of control limits, while sample absorbance is less than 50% of spike absorbance.
 - i The MRL/MDL or LOQ/LOD is elevated due to a matrix interference.
- X See case narrative.
- + The correlation coefficient for the MSA is less than 0.995.
- Q See case narrative. One or more quality control criteria was outside the limits.

Organic Data Qualifiers

- * The result is an outlier. See case narrative.
- # The control limit criteria is not applicable. See case narrative.
- A A tentatively identified compound, a suspected aldol-condensation product.
- B The analyte was found in the associated method blank at a level that is significant relative to the sample result as defined by the DOD or NELAC standards.
- C The analyte was qualitatively confirmed using GC/MS techniques, pattern recognition, or by comparing to historical data.
- D The reported result is from a dilution.
- E The result is an estimated value.
- J The result is an estimated value.
- N The result is presumptive. The analyte was tentatively identified, but a confirmation analysis was not performed.
- P The GC or HPLC confirmation criteria was exceeded. The relative percent difference is greater than 40% between the two analytical results.
- U The analyte was analyzed for, but was not detected ("Non-detect") at or above the MRL/MDL.
DOD-QSM 4.2 definition : Analyte was not detected and is reported as less than the LOD or as defined by the project. The detection limit is adjusted for dilution.
 - i The MRL/MDL or LOQ/LOD is elevated due to a chromatographic interference.
- X See case narrative.
- Q See case narrative. One or more quality control criteria was outside the limits.

Additional Petroleum Hydrocarbon Specific Qualifiers

- F The chromatographic fingerprint of the sample matches the elution pattern of the calibration standard.
- L The chromatographic fingerprint of the sample resembles a petroleum product, but the elution pattern indicates the presence of a greater amount of lighter molecular weight constituents than the calibration standard.
- H The chromatographic fingerprint of the sample resembles a petroleum product, but the elution pattern indicates the presence of a greater amount of heavier molecular weight constituents than the calibration standard.
- O The chromatographic fingerprint of the sample resembles an oil, but does not match the calibration standard.
- Y The chromatographic fingerprint of the sample resembles a petroleum product eluting in approximately the correct carbon range, but the elution pattern does not match the calibration standard.
- Z The chromatographic fingerprint does not resemble a petroleum product.

**ALS Group USA Corp. dba ALS Environmental (ALS) - Kelso
State Certifications, Accreditations, and Licenses**

| Agency | Web Site | Number |
|--------------------------|---|---------------|
| Alaska DEC UST | http://dec.alaska.gov/applications/eh/ehllabreports/USTLabs.aspx | UST-040 |
| Arizona DHS | http://www.azdhs.gov/lab/license/env.htm | AZ0339 |
| Arkansas - DEQ | http://www.adeq.state.ar.us/techsvs/labcert.htm | 88-0637 |
| California DHS (ELAP) | http://www.cdph.ca.gov/certlic/labs/Pages/ELAP.aspx | 2795 |
| DOD ELAP | http://www.denix.osd.mil/edqw/Accreditation/AccreditedLabs.cfm | L14-51 |
| Florida DOH | http://www.doh.state.fl.us/lab/EnvLabCert/WaterCert.htm | E87412 |
| Hawaii DOH | Not available | - |
| ISO 17025 | http://www.pjllabs.com/ | L16-57 |
| Louisiana DEQ | http://www.deq.louisiana.gov/portal/DIVISIONS/PublicParticipationandPermitSupport/LouisianaLaboratoryAccreditationProgram.aspx | 03016 |
| Maine DHS | Not available | WA01276 |
| Minnesota DOH | http://www.health.state.mn.us/accreditation | 053-999-457 |
| Montana DPHHS | http://www.dphhs.mt.gov/publichealth/ | CERT0047 |
| Nevada DEP | http://ndep.nv.gov/bsdw/labservice.htm | WA01276 |
| New Jersey DEP | http://www.nj.gov/dep/oqa/ | WA005 |
| North Carolina DWQ | http://www.dwqlab.org/ | 605 |
| Oklahoma DEQ | http://www.deq.state.ok.us/CSDnew/labcert.htm | 9801 |
| Oregon – DEQ (NELAP) | http://public.health.oregon.gov/LaboratoryServices/EnvironmentalLaboratoryAccreditation/Pages/index.aspx | WA100010 |
| South Carolina DHEC | http://www.scdhec.gov/environment/envserv/ | 61002 |
| Texas CEQ | http://www.tceq.texas.gov/field/qa/env_lab_accreditation.html | T104704427 |
| Washington DOE | http://www.ecy.wa.gov/programs/eap/labs/lab-accreditation.html | C544 |
| Wyoming (EPA Region 8) | http://www.epa.gov/region8/water/dwhome/wyomingdi.html | - |
| Kelso Laboratory Website | www.alsglobal.com | NA |

Analyses were performed according to our laboratory's NELAP-approved quality assurance program. A complete listing of specific NELAP-certified analytes, can be found in the certification section at www.ALSGlobal.com or at the accreditation bodies web site.

Please refer to the certification and/or accreditation body's web site if samples are submitted for compliance purposes. The states highlighted above, require the analysis be listed on the state certification if used for compliance purposes and if the method/analyte is offered by that state.



Chain of Custody

ALS Environmental—Kelso Laboratory
1317 South 13th Avenue, Kelso, WA 98626
Phone (360)577-7222 Fax (360)636-1068
www.alsglobal.com



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

Laboratory: ALS Environmental

Attention: Howard Holmes

1317 South 13th Avenue, Kelso, WA 98626

Phone Number: (360) 577-7222

Turnaround Request

1 Day 2 Day 3 Day

Standard

Other: _____

K1611027
Page 1 of 1

Laboratory Reference #: 09-192

Project Manager: David Baumeister

email: dbaumeister@onsite-env.com

Project Number: 266-008

Project Name: Stoneway Concrete

| Lab ID | Sample Identification | Date Sampled | Time Sampled | Matrix | # of Cont. | Requested Analyses |
|--------|-----------------------|--------------|--------------|--------|------------|------------------------|
| 1 | EP1-MW-7-091516 | 9/15/16 | 10:38 | Water | 2 | Formaldehyde EPA 8315A |
| 2 | MW-10-091516 | 9/15/16 | 11:58 | Water | 2 | Formaldehyde EPA 8315A |
| 3 | MW-1-091516 | 9/15/16 | 13:18 | Water | 2 | Formaldehyde EPA 8315A |
| 4 | EP1-MW-9-091516 | 9/15/16 | 14:26 | Water | 2 | Formaldehyde EPA 8315A |
| 5 | EP1-MW-1-091516 | 9/15/16 | 15:26 | Water | 2 | Formaldehyde EPA 8315A |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |

| Signature | Company | Date | Time | Comments/Special Instructions |
|------------------|---------|---------|------|-------------------------------|
| | ALS | 9/15/16 | 1500 | |
| | ALS | 9/19/16 | 0820 | |
| Relinquished by: | | | | |
| Received by: | | | | |
| Relinquished by: | | | | |
| Received by: | | | | |
| Relinquished by: | | | | |
| Received by: | | | | |



Cooler Receipt and Preservation Form

Client On Site Service Request K16 11027
 Received: 9/17/16 Opened: 9/17/16 By: [Signature] Unloaded: 9/17/16 By: [Signature]

1. Samples were received via? USPS Fed Ex UPS DHL PDX Courier Hand Delivered
 2. Samples were received in: (circle) Cooler Box Envelope Other NA
 3. Were custody seals on coolers? NA Y (N) If yes, how many and where? _____
 If present, were custody seals intact? Y N If present, were they signed and dated? Y N

| Raw Cooler Temp | Corrected Cooler Temp | Raw Temp Blank | Corrected Temp Blank | Corr. Factor | Thermometer ID | Cooler/COC ID | Tracking Number | NA | Filed |
|-----------------|-----------------------|----------------|----------------------|--------------|----------------|---------------|-----------------|------|-------|
| -0.3 | -0.3 | - | - | 0 | 360 | | 1Z684EW419340 | 0450 | |
| | | | | | | | | | |
| | | | | | | | | | |
| | | | | | | | | | |

4. Packing material: Inserts Baggies Bubble Wrap Gel Packs Wet Ice Dry Ice Sleeves
 5. Were custody papers properly filled out (ink, signed, etc.)? NA (Y) N
 6. Were samples received in good condition (temperature, unbroken)? Indicate in the table below. NA (Y) N
 If applicable, tissue samples were received: Frozen Partially Thawed Thawed
 7. Were all sample labels complete (i.e analysis, preservation, etc.)? NA (Y) N
 8. Did all sample labels and tags agree with custody papers? Indicate major discrepancies in the table on page 2. NA (Y) N
 9. Were appropriate bottles/containers and volumes received for the tests indicated? NA (Y) N
 10. Were the pH-preserved bottles (*see SMO GEN SOP*) received at the appropriate pH? Indicate in the table below (NA) Y N
 11. Were VOA vials received without headspace? Indicate in the table below. (NA) Y N
 12. Was C12/Res negative? (NA) Y N

| Sample ID on Bottle | Sample ID on COC | Identified by: |
|---------------------|------------------|----------------|
| | | |
| | | |
| | | |

| Sample ID | Bottle Count | Out of | Head- | Broke | pH | Reagent | Volume | Reagent Lot | Initials | Time |
|-----------|--------------|--------|-------|-------|----|---------|--------|-------------|----------|------|
| | Bottle Type | Temp | space | | | | added | Number | | |
| | | | | | | | | | | |
| | | | | | | | | | | |
| | | | | | | | | | | |
| | | | | | | | | | | |
| | | | | | | | | | | |

Notes, Discrepancies, & Resolutions: SHORT HOLD TIME



Carbonyls by High Performance Liquid Chromatography

ALS Environmental—Kelso Laboratory
1317 South 13th Avenue, Kelso, WA 98626
Phone (360)577-7222 Fax (360)636-1068
www.alsglobal.com

Analytical Results

Client: Onsite Environmental Incorporated
Project: Stoneway Concrete/266-008
Sample Matrix: Water

Service Request: K1611027
Date Collected: 09/15/2016
Date Received: 09/17/2016

Carbonyls by High Performance Liquid Chromatography

Sample Name: EP1-MW-7-091516
Lab Code: K1611027-001
Extraction Method: METHOD
Analysis Method: 8315A

Units: ug/L
Basis: NA
Level: Low

| Analyte Name | Result | Q | MRL | Dilution Factor | Date Extracted | Date Analyzed | Extraction Lot | Note |
|--------------|--------|---|-----|-----------------|----------------|---------------|----------------|------|
| Formaldehyde | ND | U | 100 | 1 | 09/17/16 | 09/19/16 | KWG1608327 | |

Comments: _____

Analytical Results

Client: Onsite Environmental Incorporated
Project: Stoneway Concrete/266-008
Sample Matrix: Water

Service Request: K1611027
Date Collected: 09/15/2016
Date Received: 09/17/2016

Carbonyls by High Performance Liquid Chromatography

Sample Name: MW-10-091516
Lab Code: K1611027-002
Extraction Method: METHOD
Analysis Method: 8315A

Units: ug/L
Basis: NA
Level: Low

| Analyte Name | Result | Q | MRL | Dilution Factor | Date Extracted | Date Analyzed | Extraction Lot | Note |
|--------------|--------|---|-----|-----------------|----------------|---------------|----------------|------|
| Formaldehyde | ND | U | 100 | 1 | 09/17/16 | 09/19/16 | KWG1608327 | |

Comments: _____

Analytical Results

Client: Onsite Environmental Incorporated
Project: Stoneway Concrete/266-008
Sample Matrix: Water

Service Request: K1611027
Date Collected: 09/15/2016
Date Received: 09/17/2016

Carbonyls by High Performance Liquid Chromatography

Sample Name: MW-1-091516
Lab Code: K1611027-003
Extraction Method: METHOD
Analysis Method: 8315A

Units: ug/L
Basis: NA
Level: Low

| Analyte Name | Result | Q | MRL | Dilution Factor | Date Extracted | Date Analyzed | Extraction Lot | Note |
|--------------|--------|---|-----|-----------------|----------------|---------------|----------------|------|
| Formaldehyde | ND | U | 100 | 1 | 09/17/16 | 09/19/16 | KWG1608327 | |

Comments: _____

Analytical Results

Client: Onsite Environmental Incorporated
Project: Stoneway Concrete/266-008
Sample Matrix: Water

Service Request: K1611027
Date Collected: 09/15/2016
Date Received: 09/17/2016

Carbonyls by High Performance Liquid Chromatography

Sample Name: EP1-MW-9-091516
Lab Code: K1611027-004
Extraction Method: METHOD
Analysis Method: 8315A

Units: ug/L
Basis: NA
Level: Low

| Analyte Name | Result | Q | MRL | Dilution Factor | Date Extracted | Date Analyzed | Extraction Lot | Note |
|--------------|--------|---|-----|-----------------|----------------|---------------|----------------|------|
| Formaldehyde | ND | U | 100 | 1 | 09/17/16 | 09/19/16 | KWG1608327 | |

Comments: _____

Analytical Results

Client: Onsite Environmental Incorporated
Project: Stoneway Concrete/266-008
Sample Matrix: Water

Service Request: K1611027
Date Collected: 09/15/2016
Date Received: 09/17/2016

Carbonyls by High Performance Liquid Chromatography

Sample Name: EP1-MW-1-091516
Lab Code: K1611027-005
Extraction Method: METHOD
Analysis Method: 8315A

Units: ug/L
Basis: NA
Level: Low

| Analyte Name | Result | Q | MRL | Dilution Factor | Date Extracted | Date Analyzed | Extraction Lot | Note |
|--------------|--------|---|-----|-----------------|----------------|---------------|----------------|------|
| Formaldehyde | ND | U | 100 | 1 | 09/17/16 | 09/19/16 | KWG1608327 | |

Comments: _____

Analytical Results

Client: Onsite Environmental Incorporated
Project: Stoneway Concrete/266-008
Sample Matrix: Water

Service Request: K1611027
Date Collected: NA
Date Received: NA

Carbonyls by High Performance Liquid Chromatography

Sample Name: Method Blank
Lab Code: KWG1608327-4
Extraction Method: METHOD
Analysis Method: 8315A

Units: ug/L
Basis: NA
Level: Low

| Analyte Name | Result | Q | MRL | Dilution Factor | Date Extracted | Date Analyzed | Extraction Lot | Note |
|--------------|--------|---|-----|-----------------|----------------|---------------|----------------|------|
| Formaldehyde | ND | U | 100 | 1 | 09/17/16 | 09/19/16 | KWG1608327 | |

Comments: _____

QA/QC Report

Client: Onsite Environmental Incorporated
Project: Stoneway Concrete/266-008
Sample Matrix: Water

Service Request: K1611027
Date Extracted: 09/17/2016
Date Analyzed: 09/19/2016

Matrix Spike/Duplicate Matrix Spike Summary
Carbonyls by High Performance Liquid Chromatography

Sample Name: EP1-MW-1-091516
Lab Code: K1611027-005
Extraction Method: METHOD
Analysis Method: 8315A

Units: ug/L
Basis: NA
Level: Low
Extraction Lot: KWG1608327

| Analyte Name | Sample Result | EP1-MW-1-091516MS KWG1608327-1 Matrix Spike | | | EP1-MW-1-091516DMS KWG1608327-2 Duplicate Matrix Spike | | | %Rec Limits | RPD | RPD Limit |
|--------------|---------------|---|--------------|------|--|--------------|------|-------------|-----|-----------|
| | | Result | Spike Amount | %Rec | Result | Spike Amount | %Rec | | | |
| Formaldehyde | ND | 305 | 500 | 61 | 315 | 500 | 63 | 47-117 | 3 | 30 |

Results flagged with an asterisk (*) indicate values outside control criteria.

Results flagged with a pound (#) indicate the control criteria is not applicable.

Percent recoveries and relative percent differences (RPD) are determined by the software using values in the calculation which have not been rounded.

Client: Onsite Environmental Incorporated
Project: Stoneway Concrete/266-008
Sample Matrix: Water

Service Request: K1611027
Date Extracted: 09/17/2016
Date Analyzed: 09/19/2016

Lab Control Spike Summary
Carbonyls by High Performance Liquid Chromatography

Extraction Method: METHOD
Analysis Method: 8315A

Units: ug/L
Basis: NA
Level: Low
Extraction Lot: KWG1608327

Lab Control Sample
 KWG1608327-3
Lab Control Spike

| Analyte Name | Result | Spike Amount | %Rec | %Rec Limits |
|--------------|--------|--------------|------|-------------|
| Formaldehyde | 364 | 500 | 73 | 58-118 |

Results flagged with an asterisk (*) indicate values outside control criteria.

Percent recoveries and relative percent differences (RPD) are determined by the software using values in the calculation which have not been rounded.



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

May 2, 2017

Javan Ruark
Farallon Consulting, LLC
975 5th Avenue NW
Issaquah, WA 98027

Re: Analytical Data for Project 266-003
Laboratory Reference No. 1704-211

Dear Javan:

Enclosed are the analytical results and associated quality control data for samples submitted on April 21, 2017.

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

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

Sincerely,

A handwritten signature in black ink, appearing to read "D. Baumeister", with a long horizontal stroke extending to the right.

David Baumeister
Project Manager

Enclosures



OnSite Environmental, Inc. 14648 NE 95th Street, Redmond, WA 98052 (425) 883-3881

This report pertains to the samples analyzed in accordance with the chain of custody, and is intended only for the use of the individual or company to whom it is addressed.

Date of Report: May 2, 2017
Samples Submitted: April 21, 2017
Laboratory Reference: 1704-211
Project: 266-003

Case Narrative

Samples were collected on April 21, 2017 and received by the laboratory on April 21, 2017. They were maintained at the laboratory at a temperature of 2°C to 6°C.

Please note that any and all soil sample results are reported on a dry-weight basis, unless otherwise noted below.

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



Date of Report: May 2, 2017
 Samples Submitted: April 21, 2017
 Laboratory Reference: 1704-211
 Project: 266-003

**DISSOLVED ARSENIC
 EPA 200.8**

Matrix: Water
 Units: ug/L (ppb)

| Analyte | Result | PQL | EPA Method | Date Prepared | Date Analyzed | Flags |
|-------------------|-------------------------|-----|------------|---------------|---------------|-------|
| Lab ID: | 04-211-01 | | | | | |
| Client ID: | MW-1-042117 | | | | | |
| Arsenic | ND | 3.0 | 200.8 | 4-21-17 | 4-24-17 | |
| Lab ID: | 04-211-02 | | | | | |
| Client ID: | EPI-MW-1-042117 | | | | | |
| Arsenic | ND | 3.0 | 200.8 | 4-21-17 | 4-24-17 | |
| Lab ID: | 04-211-03 | | | | | |
| Client ID: | EPI-MW-7-042117 | | | | | |
| Arsenic | ND | 3.0 | 200.8 | 4-21-17 | 4-24-17 | |
| Lab ID: | 04-211-04 | | | | | |
| Client ID: | EPI-MW-9-042117 | | | | | |
| Arsenic | 3.3 | 3.0 | 200.8 | 4-21-17 | 4-24-17 | |
| Lab ID: | 04-211-05 | | | | | |
| Client ID: | EPI-MW-10-042117 | | | | | |
| Arsenic | ND | 3.0 | 200.8 | 4-21-17 | 4-24-17 | |



Date of Report: May 2, 2017
Samples Submitted: April 21, 2017
Laboratory Reference: 1704-211
Project: 266-003

**DISSOLVED ARSENIC
EPA 200.8
METHOD BLANK QUALITY CONTROL**

Date Filtered: 4-21-17
Date Analyzed: 4-24-17

Matrix: Water
Units: ug/L (ppb)

Lab ID: MB0421F1

| Analyte | Method | Result | PQL |
|---------|--------|-----------|-----|
| Arsenic | 200.8 | ND | 3.0 |



Date of Report: May 2, 2017
Samples Submitted: April 21, 2017
Laboratory Reference: 1704-211
Project: 266-003

**DISSOLVED ARSENIC
EPA 200.8
DUPLICATE QUALITY CONTROL**

Date Filtered: 4-21-17

Date Analyzed: 4-24-17

Matrix: Water

Units: ug/L (ppb)

Lab ID: 04-211-05

| Analyte | Sample Result | Duplicate Result | RPD | PQL | Flags |
|---------|---------------|------------------|-----|-----|-------|
| Arsenic | ND | ND | NA | 3.0 | |



Date of Report: May 2, 2017
 Samples Submitted: April 21, 2017
 Laboratory Reference: 1704-211
 Project: 266-003

**DISSOLVED ARSENIC
 EPA 200.8
 MS/MSD QUALITY CONTROL**

Date Filtered: 4-21-17

Date Analyzed: 4-24-17

Matrix: Water

Units: ug/L (ppb)

Lab ID: 04-211-05

| Analyte | Spike Level | MS | Percent Recovery | MSD | Percent Recovery | RPD | Flags |
|---------|-------------|------------|------------------|------------|------------------|-----|-------|
| Arsenic | 200 | 209 | 104 | 210 | 105 | 1 | |



Date of Report: May 2, 2017
 Samples Submitted: April 21, 2017
 Laboratory Reference: 1704-211
 Project: 266-003

pH
SM 4500-H B

Matrix: Water
 Units: pH (@ 25°C)

| Analyte | Result | Method | Date Prepared | Date Analyzed | Flags |
|-------------------|--------------------|-------------|---------------|---------------|-------|
| Client ID: | MW-1-042117 | | | | |
| Laboratory ID: | 04-211-01 | | | | |
| pH | 6.8 | SM 4500-H B | 4-21-17 | 4-21-17 | |

| | | | | | |
|-------------------|------------------------|-------------|---------|---------|--|
| Client ID: | EPI-MW-1-042117 | | | | |
| Laboratory ID: | 04-211-02 | | | | |
| pH | 7.0 | SM 4500-H B | 4-21-17 | 4-21-17 | |

| | | | | | |
|-------------------|------------------------|-------------|---------|---------|--|
| Client ID: | EPI-MW-7-042117 | | | | |
| Laboratory ID: | 04-211-03 | | | | |
| pH | 8.3 | SM 4500-H B | 4-21-17 | 4-21-17 | |

| | | | | | |
|-------------------|------------------------|-------------|---------|---------|--|
| Client ID: | EPI-MW-9-042117 | | | | |
| Laboratory ID: | 04-211-04 | | | | |
| pH | 7.0 | SM 4500-H B | 4-21-17 | 4-21-17 | |

| | | | | | |
|-------------------|-------------------------|-------------|---------|---------|--|
| Client ID: | EPI-MW-10-042117 | | | | |
| Laboratory ID: | 04-211-05 | | | | |
| pH | 11.6 | SM 4500-H B | 4-21-17 | 4-21-17 | |





Data Qualifiers and Abbreviations

- A - Due to a high sample concentration, the amount spiked is insufficient for meaningful MS/MSD recovery data.
 - B - The analyte indicated was also found in the blank sample.
 - C - The duplicate RPD is outside control limits due to high result variability when analyte concentrations are within five times the quantitation limit.
 - E - The value reported exceeds the quantitation range and is an estimate.
 - F - Surrogate recovery data is not available due to the high concentration of coeluting target compounds.
 - H - The analyte indicated is a common laboratory solvent and may have been introduced during sample preparation, and be impacting the sample result.
 - I - Compound recovery is outside of the control limits.
 - J - The value reported was below the practical quantitation limit. The value is an estimate.
 - K - Sample duplicate RPD is outside control limits due to sample inhomogeneity. The sample was re-extracted and re-analyzed with similar results.
 - L - The RPD is outside of the control limits.
 - M - Hydrocarbons in the gasoline range are impacting the diesel range result.
 - M1 - Hydrocarbons in the gasoline range (toluene-naphthalene) are present in the sample.
 - N - Hydrocarbons in the lube oil range are impacting the diesel range result.
 - N1 - Hydrocarbons in diesel range are impacting lube oil range results.
 - O - Hydrocarbons indicative of heavier fuels are present in the sample and are impacting the gasoline result.
 - P - The RPD of the detected concentrations between the two columns is greater than 40.
 - Q - Surrogate recovery is outside of the control limits.
 - S - Surrogate recovery data is not available due to the necessary dilution of the sample.
 - T - The sample chromatogram is not similar to a typical _____.
 - U - The analyte was analyzed for, but was not detected above the reported sample quantitation limit.
 - U1 - The practical quantitation limit is elevated due to interferences present in the sample.
 - V - Matrix Spike/Matrix Spike Duplicate recoveries are outside control limits due to matrix effects.
 - W - Matrix Spike/Matrix Spike Duplicate RPD are outside control limits due to matrix effects.
 - X - Sample extract treated with a mercury cleanup procedure.
 - X1 - Sample extract treated with a Sulfuric acid/Silica gel cleanup procedure.
 - Y - The calibration verification for this analyte exceeded the 20% drift specified in method 8260C, and therefore the reported result should be considered an estimate. The overall performance of the calibration verification standard met the acceptance criteria of the method.
 - Z -
- ND - Not Detected at PQL
PQL - Practical Quantitation Limit
RPD - Relative Percent Difference





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May 02, 2017

Analytical Report for Service Request No: K1704094

Blair Goodrow
Onsite Environmental Incorporated
14648 NE 95th Street
Redmond, WA 98052

RE: Formaldehyde / 266-008

Dear Blair,

Enclosed are the results of the sample(s) submitted to our laboratory April 26, 2017
For your reference, these analyses have been assigned our service request number **K1704094**.

Analyses were performed according to our laboratory's NELAP-approved quality assurance program. The test results meet requirements of the current NELAP standards, where applicable, and except as noted in the laboratory case narrative provided. For a specific list of NELAP-accredited analytes, refer to the certifications section at www.alsglobal.com. All results are intended to be considered in their entirety, and ALS Group USA Corp. dba ALS Environmental (ALS) is not responsible for use of less than the complete report. Results apply only to the items submitted to the laboratory for analysis and individual items (samples) analyzed, as listed in the report.

Please contact me if you have any questions. My extension is 3364. You may also contact me via email at howard.holmes@alsglobal.com.

Respectfully submitted,

ALS Group USA, Corp. dba ALS Environmental

Howard Holmes
Project Manager



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Table of Contents

Acronyms

Qualifiers

State Certifications, Accreditations, And Licenses

Case Narrative

Chain of Custody

Carbonyls by High Performance Liquid Chromatography

Acronyms

| | |
|------------|--|
| ASTM | American Society for Testing and Materials |
| A2LA | American Association for Laboratory Accreditation |
| CARB | California Air Resources Board |
| CAS Number | Chemical Abstract Service registry Number |
| CFC | Chlorofluorocarbon |
| CFU | Colony-Forming Unit |
| DEC | Department of Environmental Conservation |
| DEQ | Department of Environmental Quality |
| DHS | Department of Health Services |
| DOE | Department of Ecology |
| DOH | Department of Health |
| EPA | U. S. Environmental Protection Agency |
| ELAP | Environmental Laboratory Accreditation Program |
| GC | Gas Chromatography |
| GC/MS | Gas Chromatography/Mass Spectrometry |
| LOD | Limit of Detection |
| LOQ | Limit of Quantitation |
| LUFT | Leaking Underground Fuel Tank |
| M | Modified |
| MCL | Maximum Contaminant Level is the highest permissible concentration of a substance allowed in drinking water as established by the USEPA. |
| MDL | Method Detection Limit |
| MPN | Most Probable Number |
| MRL | Method Reporting Limit |
| NA | Not Applicable |
| NC | Not Calculated |
| NCASI | National Council of the Paper Industry for Air and Stream Improvement |
| ND | Not Detected |
| NIOSH | National Institute for Occupational Safety and Health |
| PQL | Practical Quantitation Limit |
| RCRA | Resource Conservation and Recovery Act |
| SIM | Selected Ion Monitoring |
| TPH | Total Petroleum Hydrocarbons |
| tr | Trace level is the concentration of an analyte that is less than the PQL but greater than or equal to the MDL. |

Inorganic Data Qualifiers

- * The result is an outlier. See case narrative.
- # The control limit criteria is not applicable. See case narrative.
- B The analyte was found in the associated method blank at a level that is significant relative to the sample result as defined by the DOD or NELAC standards.
- E The result is an estimate amount because the value exceeded the instrument calibration range.
- J The result is an estimated value.
- U The analyte was analyzed for, but was not detected ("Non-detect") at or above the MRL/MDL.
DOD-QSM 4.2 definition : Analyte was not detected and is reported as less than the LOD or as defined by the project. The detection limit is adjusted for dilution.
- i The MRL/MDL or LOQ/LOD is elevated due to a matrix interference.
- X See case narrative.
- Q See case narrative. One or more quality control criteria was outside the limits.
- H The holding time for this test is immediately following sample collection. The samples were analyzed as soon as possible after receipt by the laboratory.

Metals Data Qualifiers

- # The control limit criteria is not applicable. See case narrative.
- J The result is an estimated value.
- E The percent difference for the serial dilution was greater than 10%, indicating a possible matrix interference in the sample.
- M The duplicate injection precision was not met.
- N The Matrix Spike sample recovery is not within control limits. See case narrative.
- S The reported value was determined by the Method of Standard Additions (MSA).
- U The analyte was analyzed for, but was not detected ("Non-detect") at or above the MRL/MDL.
DOD-QSM 4.2 definition : Analyte was not detected and is reported as less than the LOD or as defined by the project. The detection limit is adjusted for dilution.
- W The post-digestion spike for furnace AA analysis is out of control limits, while sample absorbance is less than 50% of spike absorbance.
 - i The MRL/MDL or LOQ/LOD is elevated due to a matrix interference.
- X See case narrative.
- + The correlation coefficient for the MSA is less than 0.995.
- Q See case narrative. One or more quality control criteria was outside the limits.

Organic Data Qualifiers

- * The result is an outlier. See case narrative.
- # The control limit criteria is not applicable. See case narrative.
- A A tentatively identified compound, a suspected aldol-condensation product.
- B The analyte was found in the associated method blank at a level that is significant relative to the sample result as defined by the DOD or NELAC standards.
- C The analyte was qualitatively confirmed using GC/MS techniques, pattern recognition, or by comparing to historical data.
- D The reported result is from a dilution.
- E The result is an estimated value.
- J The result is an estimated value.
- N The result is presumptive. The analyte was tentatively identified, but a confirmation analysis was not performed.
- P The GC or HPLC confirmation criteria was exceeded. The relative percent difference is greater than 40% between the two analytical results.
- U The analyte was analyzed for, but was not detected ("Non-detect") at or above the MRL/MDL.
DOD-QSM 4.2 definition : Analyte was not detected and is reported as less than the LOD or as defined by the project. The detection limit is adjusted for dilution.
 - i The MRL/MDL or LOQ/LOD is elevated due to a chromatographic interference.
- X See case narrative.
- Q See case narrative. One or more quality control criteria was outside the limits.

Additional Petroleum Hydrocarbon Specific Qualifiers

- F The chromatographic fingerprint of the sample matches the elution pattern of the calibration standard.
- L The chromatographic fingerprint of the sample resembles a petroleum product, but the elution pattern indicates the presence of a greater amount of lighter molecular weight constituents than the calibration standard.
- H The chromatographic fingerprint of the sample resembles a petroleum product, but the elution pattern indicates the presence of a greater amount of heavier molecular weight constituents than the calibration standard.
- O The chromatographic fingerprint of the sample resembles an oil, but does not match the calibration standard.
- Y The chromatographic fingerprint of the sample resembles a petroleum product eluting in approximately the correct carbon range, but the elution pattern does not match the calibration standard.
- Z The chromatographic fingerprint does not resemble a petroleum product.

**ALS Group USA Corp. dba ALS Environmental (ALS) - Kelso
State Certifications, Accreditations, and Licenses**

| Agency | Web Site | Number |
|--------------------------|---|---------------|
| Alaska DEC UST | http://dec.alaska.gov/applications/eh/ehllabreports/USTLabs.aspx | UST-040 |
| Arizona DHS | http://www.azdhs.gov/lab/license/env.htm | AZ0339 |
| Arkansas - DEQ | http://www.adeq.state.ar.us/techsvs/labcert.htm | 88-0637 |
| California DHS (ELAP) | http://www.cdph.ca.gov/certlic/labs/Pages/ELAP.aspx | 2795 |
| DOD ELAP | http://www.denix.osd.mil/edqw/Accreditation/AccreditedLabs.cfm | L14-51 |
| Florida DOH | http://www.doh.state.fl.us/lab/EnvLabCert/WaterCert.htm | E87412 |
| Hawaii DOH | Not available | - |
| ISO 17025 | http://www.pjllabs.com/ | L16-57 |
| Louisiana DEQ | http://www.deq.louisiana.gov/portal/DIVISIONS/PublicParticipationandPermitSupport/LouisianaLaboratoryAccreditationProgram.aspx | 03016 |
| Maine DHS | Not available | WA01276 |
| Minnesota DOH | http://www.health.state.mn.us/accreditation | 053-999-457 |
| Montana DPHHS | http://www.dphhs.mt.gov/publichealth/ | CERT0047 |
| Nevada DEP | http://ndep.nv.gov/bsdw/labservice.htm | WA01276 |
| New Jersey DEP | http://www.nj.gov/dep/oqa/ | WA005 |
| North Carolina DWQ | http://www.dwqlab.org/ | 605 |
| Oklahoma DEQ | http://www.deq.state.ok.us/CSDnew/labcert.htm | 9801 |
| Oregon – DEQ (NELAP) | http://public.health.oregon.gov/LaboratoryServices/EnvironmentalLaboratoryAccreditation/Pages/index.aspx | WA100010 |
| South Carolina DHEC | http://www.scdhec.gov/environment/envserv/ | 61002 |
| Texas CEQ | http://www.tceq.texas.gov/field/qa/env_lab_accreditation.html | T104704427 |
| Washington DOE | http://www.ecy.wa.gov/programs/eap/labs/lab-accreditation.html | C544 |
| Wyoming (EPA Region 8) | http://www.epa.gov/region8/water/dwhome/wyomingdi.html | - |
| Kelso Laboratory Website | www.alsglobal.com | NA |

Analyses were performed according to our laboratory's NELAP-approved quality assurance program. A complete listing of specific NELAP-certified analytes, can be found in the certification section at www.ALSGlobal.com or at the accreditation bodies web site.

Please refer to the certification and/or accreditation body's web site if samples are submitted for compliance purposes. The states highlighted above, require the analysis be listed on the state certification if used for compliance purposes and if the method/analyte is offered by that state.



Case Narrative

ALS Environmental—Kelso Laboratory
1317 South 13th Avenue, Kelso, WA 98626
Phone (360)577-7222 Fax (360)636-1068
www.alsglobal.com

ALS ENVIRONMENTAL

Client: Onsite Environmental
Project: Formaldehyde
Sample Matrix: Water

Service Request No.: K1704094
Date Received: 4/26/2017

Case Narrative

All analyses were performed consistent with the quality assurance program of ALS Environmental. This report contains analytical results for samples designated for Tier II data deliverables. When appropriate to the method, method blank results have been reported with each analytical test. Additional quality control analyses reported herein include: Laboratory Duplicate (DUP), Matrix Spike (MS), and Laboratory Control Sample (LCS).

Sample Receipt

Five water samples were received for analysis at ALS Environmental on 4/26/2017. The samples were received in good condition and consistent with the accompanying chain of custody form. The samples were stored in a refrigerator at 4°C upon receipt at the laboratory.

Formaldehyde by EPA 8315

Holding Time Exceptions:

The sample were received past the recommended holding time. The analysis was performed as soon as possible after receipt by the laboratory. The data was flagged to indicate the holding time violation.

Matrix Spike Recovery Exceptions:

The matrix spike recovery of Formaldehyde for sample Batch QC was outside control criteria. Recovery in the Laboratory Control Sample (LCS) was acceptable, which indicated the analytical batch was in control. The matrix spike outlier suggested a potential bias in this matrix. No further corrective action was appropriate.

No other anomalies associated with the analysis of these samples were observed.

Approved by _____





Chain of Custody

ALS Environmental—Kelso Laboratory
1317 South 13th Avenue, Kelso, WA 98626
Phone (360)577-7222 Fax (360)636-1068
www.alsglobal.com



PC HJK

Cooler Receipt and Preservation Form

Client On Site Service Request K17 04094
 Received: 4/26/17 Opened: 4/26/17 By: [Signature] Unloaded: 4/26/17 By: [Signature]

- Samples were received via? USPS Fed Ex UPS DHL PDX Courier Hand Delivered
- Samples were received in: (circle) Cooler Box Envelope Other NA
- Were custody seals on coolers? NA Y N If yes, how many and where? _____
 If present, were custody seals intact? Y N If present, were they signed and dated? Y N

| Raw Cooler Temp | Corrected Cooler Temp | Raw Temp Blank | Corrected Temp Blank | Corr. Factor | Thermometer ID | Cooler/COC ID | Tracking Number | NA | Filed |
|-----------------|-----------------------|----------------|----------------------|--------------|----------------|---------------|-----------------|------|-------|
| 0.3 | 0.2 | - | | -0.1 | 372 | | 12684E1W039846 | 0033 | |
| | | | | | | | | | |
| | | | | | | | | | |
| | | | | | | | | | |

- Packing material: Inserts Baggies Bubble Wrap Gel Packs Wet Ice Dry Ice Sleeves
- Were custody papers properly filled out (ink, signed, etc.)? NA Y N
- Were samples received in good condition (temperature, unbroken)? *Indicate in the table below.* NA Y N
 If applicable, tissue samples were received: Frozen Partially Thawed Thawed
- Were all sample labels complete (i.e analysis, preservation, etc.)? NA Y N
- Did all sample labels and tags agree with custody papers? *Indicate major discrepancies in the table on page 2.* NA Y N
- Were appropriate bottles/containers and volumes received for the tests indicated? NA Y N
- Were the pH-preserved bottles (*see SMO GEN SOP*) received at the appropriate pH? *Indicate in the table below* NA Y N
- Were VOA vials received without headspace? *Indicate in the table below.* NA Y N
- Was C12/Res negative? NA Y N

| Sample ID on Bottle | Sample ID on COC | Identified by: |
|---------------------|------------------|----------------|
| | | |
| | | |
| | | |

| Sample ID | Bottle Count | Bottle Type | Out of Temp | Head-space | Broke | pH | Reagent | Volume added | Reagent Lot Number | Initials | Time |
|-----------|--------------|-------------|-------------|------------|-------|----|---------|--------------|--------------------|----------|------|
| | | | | | | | | | | | |
| | | | | | | | | | | | |
| | | | | | | | | | | | |
| | | | | | | | | | | | |
| | | | | | | | | | | | |

Notes, Discrepancies, & Resolutions: _____

SHORT HOLD TIME



Carbonyls by High Performance Liquid Chromatography

ALS Environmental—Kelso Laboratory
1317 South 13th Avenue, Kelso, WA 98626
Phone (360)577-7222 Fax (360)636-1068
www.alsglobal.com

Analytical Results

Client: Onsite Environmental Incorporated
Project: Formaldehyde/266-008
Sample Matrix: Water

Service Request: K1704094
Date Collected: 04/21/2017
Date Received: 04/26/2017

Carbonyls by High Performance Liquid Chromatography

Sample Name: MW-1-042117
Lab Code: K1704094-001
Extraction Method: METHOD
Analysis Method: 8315A

Units: ug/L
Basis: NA
Level: Low

| Analyte Name | Result | Q | MRL | Dilution Factor | Date Extracted | Date Analyzed | Extraction Lot | Note |
|--------------|--------|---|-----|-----------------|----------------|---------------|----------------|------|
| Formaldehyde | ND | U | 100 | 1 | 04/26/17 | 04/26/17 | KWG1703356 | * |

* See Case Narrative

Comments: _____

Analytical Results

Client: Onsite Environmental Incorporated
Project: Formaldehyde/266-008
Sample Matrix: Water

Service Request: K1704094
Date Collected: 04/21/2017
Date Received: 04/26/2017

Carbonyls by High Performance Liquid Chromatography

Sample Name: EPI-MW-1-042117
Lab Code: K1704094-002
Extraction Method: METHOD
Analysis Method: 8315A

Units: ug/L
Basis: NA
Level: Low

| Analyte Name | Result | Q | MRL | Dilution Factor | Date Extracted | Date Analyzed | Extraction Lot | Note |
|--------------|--------|---|-----|-----------------|----------------|---------------|----------------|------|
| Formaldehyde | ND | U | 100 | 1 | 04/26/17 | 04/26/17 | KWG1703356 | * |

* See Case Narrative

Comments: _____

Analytical Results

Client: Onsite Environmental Incorporated
Project: Formaldehyde/266-008
Sample Matrix: Water

Service Request: K1704094
Date Collected: 04/21/2017
Date Received: 04/26/2017

Carbonyls by High Performance Liquid Chromatography

Sample Name: EPI-MW-7-042117
Lab Code: K1704094-003
Extraction Method: METHOD
Analysis Method: 8315A

Units: ug/L
Basis: NA
Level: Low

| Analyte Name | Result | Q | MRL | Dilution Factor | Date Extracted | Date Analyzed | Extraction Lot | Note |
|--------------|--------|---|-----|-----------------|----------------|---------------|----------------|------|
| Formaldehyde | ND | U | 100 | 1 | 04/26/17 | 04/26/17 | KWG1703356 | * |

* See Case Narrative

Comments: _____

Analytical Results

Client: Onsite Environmental Incorporated
Project: Formaldehyde/266-008
Sample Matrix: Water

Service Request: K1704094
Date Collected: 04/21/2017
Date Received: 04/26/2017

Carbonyls by High Performance Liquid Chromatography

Sample Name: EPI-MW-9-042117
Lab Code: K1704094-004
Extraction Method: METHOD
Analysis Method: 8315A

Units: ug/L
Basis: NA
Level: Low

| Analyte Name | Result | Q | MRL | Dilution Factor | Date Extracted | Date Analyzed | Extraction Lot | Note |
|--------------|--------|---|-----|-----------------|----------------|---------------|----------------|------|
| Formaldehyde | ND | U | 100 | 1 | 04/26/17 | 04/26/17 | KWG1703356 | * |

* See Case Narrative

Comments: _____

Analytical Results

Client: Onsite Environmental Incorporated
Project: Formaldehyde/266-008
Sample Matrix: Water

Service Request: K1704094
Date Collected: 04/21/2017
Date Received: 04/26/2017

Carbonyls by High Performance Liquid Chromatography

Sample Name: EPI-MW-10-042117
Lab Code: K1704094-005
Extraction Method: METHOD
Analysis Method: 8315A

Units: ug/L
Basis: NA
Level: Low

| Analyte Name | Result | Q | MRL | Dilution Factor | Date Extracted | Date Analyzed | Extraction Lot | Note |
|--------------|--------|---|-----|-----------------|----------------|---------------|----------------|------|
| Formaldehyde | ND | U | 100 | 1 | 04/26/17 | 04/26/17 | KWG1703356 | * |

* See Case Narrative

Comments: _____

Analytical Results

Client: Onsite Environmental Incorporated
Project: Formaldehyde/266-008
Sample Matrix: Water

Service Request: K1704094
Date Collected: NA
Date Received: NA

Carbonyls by High Performance Liquid Chromatography

Sample Name: Method Blank
Lab Code: KWG1703356-4
Extraction Method: METHOD
Analysis Method: 8315A

Units: ug/L
Basis: NA
Level: Low

| Analyte Name | Result | Q | MRL | Dilution Factor | Date Extracted | Date Analyzed | Extraction Lot | Note |
|--------------|--------|---|-----|-----------------|----------------|---------------|----------------|------|
| Formaldehyde | ND | U | 100 | 1 | 04/26/17 | 04/26/17 | KWG1703356 | |

Comments: _____

QA/QC Report

Client: Onsite Environmental Incorporated
Project: Formaldehyde/266-008
Sample Matrix: Water

Service Request: K1704094
Date Extracted: 04/26/2017
Date Analyzed: 04/27/2017

Matrix Spike/Duplicate Matrix Spike Summary
Carbonyls by High Performance Liquid Chromatography

Sample Name: Batch QC
Lab Code: K1704100-001
Extraction Method: METHOD
Analysis Method: 8315A

Units: ug/L
Basis: NA
Level: Low
Extraction Lot: KWG1703356

| Analyte Name | Sample Result | Batch QCMS KWG1703356-1 Matrix Spike | | | Batch QCDMS KWG1703356-2 Duplicate Matrix Spike | | | %Rec Limits | RPD | RPD Limit |
|--------------|---------------|--|--------------|-------|---|--------------|-------|-------------|-----|-----------|
| | | Result | Spike Amount | %Rec | Result | Spike Amount | %Rec | | | |
| Formaldehyde | 300 | 1300 | 500 | 200 * | 1320 | 500 | 204 * | 47-117 | 1 | 30 |

Results flagged with an asterisk (*) indicate values outside control criteria.

Results flagged with a pound (#) indicate the control criteria is not applicable.

Percent recoveries and relative percent differences (RPD) are determined by the software using values in the calculation which have not been rounded.

Client: Onsite Environmental Incorporated
Project: Formaldehyde/266-008
Sample Matrix: Water

Service Request: K1704094
Date Extracted: 04/26/2017
Date Analyzed: 04/26/2017

Lab Control Spike Summary
Carbonyls by High Performance Liquid Chromatography

Extraction Method: METHOD
Analysis Method: 8315A

Units: ug/L
Basis: NA
Level: Low
Extraction Lot: KWG1703356

Lab Control Sample
 KWG1703356-3
Lab Control Spike

| Analyte Name | Result | Spike Amount | %Rec | %Rec Limits |
|--------------|--------|--------------|------|-------------|
| Formaldehyde | 365 | 500 | 73 | 58-118 |

Results flagged with an asterisk (*) indicate values outside control criteria.

Percent recoveries and relative percent differences (RPD) are determined by the software using values in the calculation which have not been rounded.



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

July 31, 2017

Pete Kingston
Farallon Consulting
1809 7th Ave., Suite 1111
Seattle, WA 98101

Re: Analytical Data for Project 266-008
Laboratory Reference No. 1707-204

Dear Pete:

Enclosed are the analytical results and associated quality control data for samples submitted on July 20, 2017.

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

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

Sincerely,

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

David Baumeister
Project Manager

Enclosures



OnSite Environmental, Inc. 14648 NE 95th Street, Redmond, WA 98052 (425) 883-3881

This report pertains to the samples analyzed in accordance with the chain of custody, and is intended only for the use of the individual or company to whom it is addressed.

Date of Report: July 31, 2017
Samples Submitted: July 20, 2017
Laboratory Reference: 1707-204
Project: 266-008

Case Narrative

Samples were collected on July 20, 2017 and received by the laboratory on July 20, 2017. They were maintained at the laboratory at a temperature of 2°C to 6°C.

Please note that any and all soil sample results are reported on a dry-weight basis, unless otherwise noted below.

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



Date of Report: July 31, 2017
 Samples Submitted: July 20, 2017
 Laboratory Reference: 1707-204
 Project: 266-008

**DISSOLVED ARSENIC
 EPA 200.8**

Matrix: Water
 Units: ug/L (ppb)

| Analyte | Result | PQL | EPA Method | Date Prepared | Date Analyzed | Flags |
|-------------------|------------------------|-----|------------|---------------|---------------|-------|
| Lab ID: | 07-204-01 | | | | | |
| Client ID: | MW-1-072017 | | | | | |
| Arsenic | ND | 3.0 | 200.8 | 7-21-17 | 7-26-17 | |
| Lab ID: | 07-204-02 | | | | | |
| Client ID: | EPI-MW-1-072017 | | | | | |
| Arsenic | ND | 3.0 | 200.8 | 7-21-17 | 7-26-17 | |
| Lab ID: | 07-204-03 | | | | | |
| Client ID: | EPI-MW-7-072017 | | | | | |
| Arsenic | 4.3 | 3.0 | 200.8 | 7-21-17 | 7-26-17 | |
| Lab ID: | 07-204-04 | | | | | |
| Client ID: | EPI-MW-9-072017 | | | | | |
| Arsenic | 5.7 | 3.0 | 200.8 | 7-21-17 | 7-26-17 | |
| Lab ID: | 07-204-05 | | | | | |
| Client ID: | MW-10-072017 | | | | | |
| Arsenic | 3.3 | 3.0 | 200.8 | 7-21-17 | 7-26-17 | |



Date of Report: July 31, 2017
Samples Submitted: July 20, 2017
Laboratory Reference: 1707-204
Project: 266-008

**DISSOLVED ARSENIC
EPA 200.8
METHOD BLANK QUALITY CONTROL**

Date Filtered: 7-21-17
Date Analyzed: 7-26-17

Matrix: Water
Units: ug/L (ppb)

Lab ID: MB0721F1

| Analyte | Method | Result | PQL |
|---------|--------|-----------|-----|
| Arsenic | 200.8 | ND | 3.0 |



Date of Report: July 31, 2017
Samples Submitted: July 20, 2017
Laboratory Reference: 1707-204
Project: 266-008

**DISSOLVED ARSENIC
EPA 200.8
DUPLICATE QUALITY CONTROL**

Date Filtered: 7-21-17

Date Analyzed: 7-26-17

Matrix: Water

Units: ug/L (ppb)

Lab ID: 07-211-15

| Analyte | Sample Result | Duplicate Result | RPD | PQL | Flags |
|---------|---------------|------------------|-----|-----|-------|
| Arsenic | 8.80 | 8.35 | 5 | 3.0 | |



Date of Report: July 31, 2017
 Samples Submitted: July 20, 2017
 Laboratory Reference: 1707-204
 Project: 266-008

**DISSOLVED ARSENIC
 EPA 200.8
 MS/MSD QUALITY CONTROL**

Date Filtered: 7-21-17

Date Analyzed: 7-26-17

Matrix: Water

Units: ug/L (ppb)

Lab ID: 07-211-15

| Analyte | Spike Level | MS | Percent Recovery | MSD | Percent Recovery | RPD | Flags |
|---------|-------------|------------|------------------|------------|------------------|-----|-------|
| Arsenic | 200 | 220 | 106 | 226 | 109 | 3 | |



Date of Report: July 31, 2017
 Samples Submitted: July 20, 2017
 Laboratory Reference: 1707-204
 Project: 266-008

pH
SM 4500-H B

Matrix: Water
 Units: pH (@ 25°C)

| Analyte | Result | Method | Date Prepared | Date Analyzed | Flags |
|-------------------|--------------------|-------------|---------------|---------------|-------|
| Client ID: | MW-1-072017 | | | | |
| Laboratory ID: | 07-204-01 | | | | |
| pH | 7.5 | SM 4500-H B | 7-21-17 | 7-21-17 | |

| | | | | | |
|-------------------|------------------------|-------------|---------|---------|--|
| Client ID: | EPI-MW-1-072017 | | | | |
| Laboratory ID: | 07-204-02 | | | | |
| pH | 7.4 | SM 4500-H B | 7-21-17 | 7-21-17 | |

| | | | | | |
|-------------------|------------------------|-------------|---------|---------|--|
| Client ID: | EPI-MW-7-072017 | | | | |
| Laboratory ID: | 07-204-03 | | | | |
| pH | 8.9 | SM 4500-H B | 7-21-17 | 7-21-17 | |

| | | | | | |
|-------------------|------------------------|-------------|---------|---------|--|
| Client ID: | EPI-MW-9-072017 | | | | |
| Laboratory ID: | 07-204-04 | | | | |
| pH | 7.8 | SM 4500-H B | 7-21-17 | 7-21-17 | |

| | | | | | |
|-------------------|---------------------|-------------|---------|---------|--|
| Client ID: | MW-10-072017 | | | | |
| Laboratory ID: | 07-204-05 | | | | |
| pH | 11.5 | SM 4500-H B | 7-21-17 | 7-21-17 | |





Data Qualifiers and Abbreviations

- A - Due to a high sample concentration, the amount spiked is insufficient for meaningful MS/MSD recovery data.
- B - The analyte indicated was also found in the blank sample.
- C - The duplicate RPD is outside control limits due to high result variability when analyte concentrations are within five times the quantitation limit.
- E - The value reported exceeds the quantitation range and is an estimate.
- F - Surrogate recovery data is not available due to the high concentration of coeluting target compounds.
- H - The analyte indicated is a common laboratory solvent and may have been introduced during sample preparation, and be impacting the sample result.
- I - Compound recovery is outside of the control limits.
- J - The value reported was below the practical quantitation limit. The value is an estimate.
- K - Sample duplicate RPD is outside control limits due to sample inhomogeneity. The sample was re-extracted and re-analyzed with similar results.
- L - The RPD is outside of the control limits.
- M - Hydrocarbons in the gasoline range are impacting the diesel range result.
- M1 - Hydrocarbons in the gasoline range (toluene-naphthalene) are present in the sample.
- N - Hydrocarbons in the lube oil range are impacting the diesel range result.
- N1 - Hydrocarbons in diesel range are impacting lube oil range results.
- O - Hydrocarbons indicative of heavier fuels are present in the sample and are impacting the gasoline result.
- P - The RPD of the detected concentrations between the two columns is greater than 40.
- Q - Surrogate recovery is outside of the control limits.
- S - Surrogate recovery data is not available due to the necessary dilution of the sample.
- T - The sample chromatogram is not similar to a typical _____.
- U - The analyte was analyzed for, but was not detected above the reported sample quantitation limit.
- U1 - The practical quantitation limit is elevated due to interferences present in the sample.
- V - Matrix Spike/Matrix Spike Duplicate recoveries are outside control limits due to matrix effects.
- W - Matrix Spike/Matrix Spike Duplicate RPD are outside control limits due to matrix effects.
- X - Sample extract treated with a mercury cleanup procedure.
- X1 - Sample extract treated with a Sulfuric acid/Silica gel cleanup procedure.
- Y - The calibration verification for this analyte exceeded the 20% drift specified in method 8260C, and therefore the reported result should be considered an estimate. The overall performance of the calibration verification standard met the acceptance criteria of the method.
- Z -
 - ND - Not Detected at PQL
 - PQL - Practical Quantitation Limit
 - RPD - Relative Percent Difference





ALS Environmental
ALS Group USA, Corp
1317 South 13th Avenue
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July 28, 2017

Analytical Report for Service Request No: K1707772

Blair Goodrow
Onsite Environmental Incorporated
14648 NE 95th Street
Redmond, WA 98052

RE: Old Stoneway Renton / 266-008

Dear Blair,

Enclosed are the results of the sample(s) submitted to our laboratory July 24, 2017
For your reference, these analyses have been assigned our service request number **K1707772**.

Analyses were performed according to our laboratory's NELAP-approved quality assurance program. The test results meet requirements of the current NELAP standards, where applicable, and except as noted in the laboratory case narrative provided. For a specific list of NELAP-accredited analytes, refer to the certifications section at www.alsglobal.com. All results are intended to be considered in their entirety, and ALS Group USA Corp. dba ALS Environmental (ALS) is not responsible for use of less than the complete report. Results apply only to the items submitted to the laboratory for analysis and individual items (samples) analyzed, as listed in the report.

Please contact me if you have any questions. My extension is 3364. You may also contact me via email at howard.holmes@alsglobal.com.

Respectfully submitted,

ALS Group USA, Corp. dba ALS Environmental

Howard Holmes
Project Manager



ALS Environmental
ALS Group USA, Corp
1317 South 13th Avenue
Kelso, WA 98626
T : +1 360 577 7222
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www.alsglobal.com

Table of Contents

Acronyms

Qualifiers

State Certifications, Accreditations, And Licenses

Case Narrative

Chain of Custody

Carbonyls by High Performance Liquid Chromatography

Acronyms

| | |
|------------|--|
| ASTM | American Society for Testing and Materials |
| A2LA | American Association for Laboratory Accreditation |
| CARB | California Air Resources Board |
| CAS Number | Chemical Abstract Service registry Number |
| CFC | Chlorofluorocarbon |
| CFU | Colony-Forming Unit |
| DEC | Department of Environmental Conservation |
| DEQ | Department of Environmental Quality |
| DHS | Department of Health Services |
| DOE | Department of Ecology |
| DOH | Department of Health |
| EPA | U. S. Environmental Protection Agency |
| ELAP | Environmental Laboratory Accreditation Program |
| GC | Gas Chromatography |
| GC/MS | Gas Chromatography/Mass Spectrometry |
| LOD | Limit of Detection |
| LOQ | Limit of Quantitation |
| LUFT | Leaking Underground Fuel Tank |
| M | Modified |
| MCL | Maximum Contaminant Level is the highest permissible concentration of a substance allowed in drinking water as established by the USEPA. |
| MDL | Method Detection Limit |
| MPN | Most Probable Number |
| MRL | Method Reporting Limit |
| NA | Not Applicable |
| NC | Not Calculated |
| NCASI | National Council of the Paper Industry for Air and Stream Improvement |
| ND | Not Detected |
| NIOSH | National Institute for Occupational Safety and Health |
| PQL | Practical Quantitation Limit |
| RCRA | Resource Conservation and Recovery Act |
| SIM | Selected Ion Monitoring |
| TPH | Total Petroleum Hydrocarbons |
| tr | Trace level is the concentration of an analyte that is less than the PQL but greater than or equal to the MDL. |

Inorganic Data Qualifiers

- * The result is an outlier. See case narrative.
- # The control limit criteria is not applicable. See case narrative.
- B The analyte was found in the associated method blank at a level that is significant relative to the sample result as defined by the DOD or NELAC standards.
- E The result is an estimate amount because the value exceeded the instrument calibration range.
- J The result is an estimated value.
- U The analyte was analyzed for, but was not detected ("Non-detect") at or above the MRL/MDL.
DOD-QSM 4.2 definition : Analyte was not detected and is reported as less than the LOD or as defined by the project. The detection limit is adjusted for dilution.
- i The MRL/MDL or LOQ/LOD is elevated due to a matrix interference.
- X See case narrative.
- Q See case narrative. One or more quality control criteria was outside the limits.
- H The holding time for this test is immediately following sample collection. The samples were analyzed as soon as possible after receipt by the laboratory.

Metals Data Qualifiers

- # The control limit criteria is not applicable. See case narrative.
- J The result is an estimated value.
- E The percent difference for the serial dilution was greater than 10%, indicating a possible matrix interference in the sample.
- M The duplicate injection precision was not met.
- N The Matrix Spike sample recovery is not within control limits. See case narrative.
- S The reported value was determined by the Method of Standard Additions (MSA).
- U The analyte was analyzed for, but was not detected ("Non-detect") at or above the MRL/MDL.
DOD-QSM 4.2 definition : Analyte was not detected and is reported as less than the LOD or as defined by the project. The detection limit is adjusted for dilution.
- W The post-digestion spike for furnace AA analysis is out of control limits, while sample absorbance is less than 50% of spike absorbance.
 - i The MRL/MDL or LOQ/LOD is elevated due to a matrix interference.
- X See case narrative.
- + The correlation coefficient for the MSA is less than 0.995.
- Q See case narrative. One or more quality control criteria was outside the limits.

Organic Data Qualifiers

- * The result is an outlier. See case narrative.
- # The control limit criteria is not applicable. See case narrative.
- A A tentatively identified compound, a suspected aldol-condensation product.
- B The analyte was found in the associated method blank at a level that is significant relative to the sample result as defined by the DOD or NELAC standards.
- C The analyte was qualitatively confirmed using GC/MS techniques, pattern recognition, or by comparing to historical data.
- D The reported result is from a dilution.
- E The result is an estimated value.
- J The result is an estimated value.
- N The result is presumptive. The analyte was tentatively identified, but a confirmation analysis was not performed.
- P The GC or HPLC confirmation criteria was exceeded. The relative percent difference is greater than 40% between the two analytical results.
- U The analyte was analyzed for, but was not detected ("Non-detect") at or above the MRL/MDL.
DOD-QSM 4.2 definition : Analyte was not detected and is reported as less than the LOD or as defined by the project. The detection limit is adjusted for dilution.
 - i The MRL/MDL or LOQ/LOD is elevated due to a chromatographic interference.
- X See case narrative.
- Q See case narrative. One or more quality control criteria was outside the limits.

Additional Petroleum Hydrocarbon Specific Qualifiers

- F The chromatographic fingerprint of the sample matches the elution pattern of the calibration standard.
- L The chromatographic fingerprint of the sample resembles a petroleum product, but the elution pattern indicates the presence of a greater amount of lighter molecular weight constituents than the calibration standard.
- H The chromatographic fingerprint of the sample resembles a petroleum product, but the elution pattern indicates the presence of a greater amount of heavier molecular weight constituents than the calibration standard.
- O The chromatographic fingerprint of the sample resembles an oil, but does not match the calibration standard.
- Y The chromatographic fingerprint of the sample resembles a petroleum product eluting in approximately the correct carbon range, but the elution pattern does not match the calibration standard.
- Z The chromatographic fingerprint does not resemble a petroleum product.

**ALS Group USA Corp. dba ALS Environmental (ALS) - Kelso
State Certifications, Accreditations, and Licenses**

| Agency | Web Site | Number |
|--------------------------|---|---------------|
| Alaska DEH | http://dec.alaska.gov/eh/lab/cs/csapproval.htm | UST-040 |
| Arizona DHS | http://www.azdhs.gov/lab/license/env.htm | AZ0339 |
| Arkansas - DEQ | http://www.adeq.state.ar.us/techsvs/labcert.htm | 88-0637 |
| California DHS (ELAP) | http://www.cdph.ca.gov/certlic/labs/Pages/ELAP.aspx | 2795 |
| DOD ELAP | http://www.denix.osd.mil/edqw/Accreditation/AccreditedLabs.cfm | L14-51 |
| Florida DOH | http://www.doh.state.fl.us/lab/EnvLabCert/WaterCert.htm | E87412 |
| Hawaii DOH | http://health.hawaii.gov/ | - |
| ISO 17025 | http://www.pjllabs.com/ | L16-57 |
| Louisiana DEQ | http://www.deq.louisiana.gov/page/la-lab-accreditation | 03016 |
| Maine DHS | http://www.maine.gov/dhhs/ | WA01276 |
| Minnesota DOH | http://www.health.state.mn.us/accreditation | 053-999-457 |
| Nevada DEP | http://ndep.nv.gov/bsdw/labservice.htm | WA01276 |
| New Jersey DEP | http://www.nj.gov/dep/enforcement/oqa.html | WA005 |
| New York - DOH | https://www.wadsworth.org/regulatory/elap | 12060 |
| North Carolina DEQ | https://deq.nc.gov/about/divisions/water-resources/water-resources-data/water-sciences-home-page/laboratory-certification-branch/non-field-lab-certification | 605 |
| Oklahoma DEQ | http://www.deq.state.ok.us/CSDnew/labcert.htm | 9801 |
| Oregon – DEQ (NELAP) | http://public.health.oregon.gov/LaboratoryServices/EnvironmentalLaboratoryAccreditation/Pages/index.aspx | WA100010 |
| South Carolina DHEC | http://www.scdhec.gov/environment/EnvironmentalLabCertification/ | 61002 |
| Texas CEQ | http://www.tceq.texas.gov/field/qa/env_lab_accreditation.html | T104704427 |
| Washington DOE | http://www.ecy.wa.gov/programs/eap/labs/lab-accreditation.html | C544 |
| Wyoming (EPA Region 8) | https://www.epa.gov/region8-waterops/epa-region-8-certified-drinking-water | - |
| Kelso Laboratory Website | www.alsglobal.com | NA |

Analyses were performed according to our laboratory's NELAP-approved quality assurance program. A complete listing of specific NELAP-certified analytes, can be found in the certification section at www.ALSGlobal.com or at the accreditation bodies web site.
Please refer to the certification and/or accreditation body's web site if samples are submitted for compliance purposes. The states highlighted above, require the analysis be listed on the state certification if used for compliance purposes and if the method/analyte is offered by that state.



Case Narrative

ALS Environmental—Kelso Laboratory
1317 South 13th Avenue, Kelso, WA 98626
Phone (360)577-7222 Fax (360)636-1068
www.alsglobal.com

ALS ENVIRONMENTAL

Client: Onsite Environmental Incorporated
Project: Old Stoneway Renton
Sample Matrix: Water

Service Request No.: K1707772
Date Received: 07/24/2017

Case Narrative

All analyses were performed consistent with the quality assurance program of ALS Environmental. This report contains analytical results for samples designated for Tier II data deliverables. When appropriate to the method, method blank results have been reported with each analytical test. Surrogate recoveries have been reported for all applicable organic analyses. Additional quality control analyses reported herein include: Laboratory Duplicate (DUP), Matrix Spike (MS), Matrix/Duplicate Matrix Spike (MS/DMS), Laboratory Control Sample (LCS), and Laboratory/Duplicate Laboratory Control Sample (LCS/DLCS).

Sample Receipt

Five water samples were received for analysis at ALS Environmental on 07/24/2017. The samples were received in good condition and consistent with the accompanying chain of custody form. The samples were stored in a refrigerator at 4°C upon receipt at the laboratory.

Carbonyls by Method 8315

Holding Time Exceptions:

All samples were received past the extraction holding time. The analysis was performed as soon as possible after receipt by the laboratory. The data was flagged to indicate the holding time violation.

No other anomalies associated with the analysis of these samples were observed.

Approved by _____





Chain of Custody

ALS Environmental—Kelso Laboratory
1317 South 13th Avenue, Kelso, WA 98626
Phone (360)577-7222 Fax (360)636-1068
www.alsglobal.com



PC Howard

Cooler Receipt and Preservation Form

Client Onsite Service Request K17 7772

Received: 7/24/17 Opened: 7/24/17 By: UU Unloaded: 7/24/17 By: UU

- 1. Samples were received via? USPS Fed Ex UPS DHL PDX Courier Hand Delivered
- 2. Samples were received in: (circle) Cooler Box Envelope Other NA
- 3. Were custody seals on coolers? NA Y N If yes, how many and where? _____
If present, were custody seals intact? Y N If present, were they signed and dated? Y N

| Raw Cooler Temp | Corrected Cooler Temp | Raw Temp Blank | Corrected Temp Blank | Corr. Factor | Thermometer ID | Cooler/COC ID NA | Tracking Number NA | Filed |
|-----------------|-----------------------|----------------|----------------------|--------------|----------------|------------------|--------------------|-------|
| 22.7 | 22.5 | - | - | -0.2 | 298 | | 12684E1W4197476233 | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |

- 4. Packing material: Inserts Baggies Bubble Wrap Gel Packs Wet Ice Dry Ice Sleeves
- 5. Were custody papers properly filled out (ink, signed, etc.)? NA Y N
- 6. Were samples received in good condition (temperature, unbroken)? Indicate in the table below.
If applicable, tissue samples were received: Frozen Partially Thawed Thawed NA Y N
- 7. Were all sample labels complete (i.e analysis, preservation, etc.)? NA Y N
- 8. Did all sample labels and tags agree with custody papers? Indicate major discrepancies in the table on page 2. NA Y N
- 9. Were appropriate bottles/containers and volumes received for the tests indicated? NA Y N
- 10. Were the pH-preserved bottles (see SMO GEN SOP) received at the appropriate pH? Indicate in the table below. NA Y N
- 11. Were VOA vials received without headspace? Indicate in the table below. NA Y N
- 12. Was C12/Res negative? NA Y N

| Sample ID on Bottle | Sample ID on COC | Identified by: |
|---------------------|------------------|----------------|
| | | |
| | | |
| | | |

| Sample ID | Bottle Count Bottle Type | Out of Temp | Head-space | Broke | pH | Reagent | Volume added | Reagent Lot Number | Initials | Time |
|-----------|--------------------------|-------------|------------|-------|----|---------|--------------|--------------------|----------|------|
| | | | | | | | | | | |
| | | | | | | | | | | |
| | | | | | | | | | | |
| | | | | | | | | | | |
| | | | | | | | | | | |

Notes, Discrepancies, & Resolutions: _____



Carbonyls by High Performance Liquid Chromatography

ALS Environmental—Kelso Laboratory
1317 South 13th Avenue, Kelso, WA 98626
Phone (360)577-7222 Fax (360)636-1068
www.alsglobal.com

Analytical Results

Client: Onsite Environmental Incorporated
Project: Old Stoneway Renton/266-008
Sample Matrix: Water

Service Request: K1707772
Date Collected: 07/20/2017
Date Received: 07/24/2017

Carbonyls by High Performance Liquid Chromatography

Sample Name: MW-1-0727017
Lab Code: K1707772-001
Extraction Method: METHOD
Analysis Method: 8315A

Units: ug/L
Basis: NA
Level: Low

| Analyte Name | Result | Q | MRL | Dilution Factor | Date Extracted | Date Analyzed | Extraction Lot | Note |
|--------------|--------|---|-----|-----------------|----------------|---------------|----------------|------|
| Formaldehyde | ND | U | 100 | 1 | 07/25/17 | 07/25/17 | KWG1706247 | * |

* See Case Narrative

Comments: _____

Analytical Results

Client: Onsite Environmental Incorporated
Project: Old Stoneway Renton/266-008
Sample Matrix: Water

Service Request: K1707772
Date Collected: 07/20/2017
Date Received: 07/24/2017

Carbonyls by High Performance Liquid Chromatography

Sample Name: EP1-MW-1-0727017
Lab Code: K1707772-002
Extraction Method: METHOD
Analysis Method: 8315A

Units: ug/L
Basis: NA
Level: Low

| Analyte Name | Result | Q | MRL | Dilution Factor | Date Extracted | Date Analyzed | Extraction Lot | Note |
|--------------|--------|---|-----|-----------------|----------------|---------------|----------------|------|
| Formaldehyde | ND | U | 100 | 1 | 07/25/17 | 07/25/17 | KWG1706247 | * |

* See Case Narrative

Comments: _____

Analytical Results

Client: Onsite Environmental Incorporated
Project: Old Stoneway Renton/266-008
Sample Matrix: Water

Service Request: K1707772
Date Collected: 07/20/2017
Date Received: 07/24/2017

Carbonyls by High Performance Liquid Chromatography

Sample Name: EPI-MW-7-0727017
Lab Code: K1707772-003
Extraction Method: METHOD
Analysis Method: 8315A

Units: ug/L
Basis: NA
Level: Low

| Analyte Name | Result | Q | MRL | Dilution Factor | Date Extracted | Date Analyzed | Extraction Lot | Note |
|--------------|--------|---|-----|-----------------|----------------|---------------|----------------|------|
| Formaldehyde | ND | U | 100 | 1 | 07/25/17 | 07/25/17 | KWG1706247 | * |

* See Case Narrative

Comments: _____

Analytical Results

Client: Onsite Environmental Incorporated
Project: Old Stoneway Renton/266-008
Sample Matrix: Water

Service Request: K1707772
Date Collected: 07/20/2017
Date Received: 07/24/2017

Carbonyls by High Performance Liquid Chromatography

Sample Name: EPI-MW-9-0727017
Lab Code: K1707772-004
Extraction Method: METHOD
Analysis Method: 8315A

Units: ug/L
Basis: NA
Level: Low

| Analyte Name | Result | Q | MRL | Dilution Factor | Date Extracted | Date Analyzed | Extraction Lot | Note |
|--------------|--------|---|-----|-----------------|----------------|---------------|----------------|------|
| Formaldehyde | ND | U | 100 | 1 | 07/25/17 | 07/25/17 | KWG1706247 | * |

* See Case Narrative

Comments: _____

Analytical Results

Client: Onsite Environmental Incorporated
Project: Old Stoneway Renton/266-008
Sample Matrix: Water

Service Request: K1707772
Date Collected: 07/20/2017
Date Received: 07/24/2017

Carbonyls by High Performance Liquid Chromatography

Sample Name: MW-10-0727017
Lab Code: K1707772-005
Extraction Method: METHOD
Analysis Method: 8315A

Units: ug/L
Basis: NA
Level: Low

| Analyte Name | Result | Q | MRL | Dilution Factor | Date Extracted | Date Analyzed | Extraction Lot | Note |
|--------------|--------|---|-----|-----------------|----------------|---------------|----------------|------|
| Formaldehyde | ND | U | 100 | 1 | 07/25/17 | 07/25/17 | KWG1706247 | * |

* See Case Narrative

Comments: _____

Analytical Results

Client: Onsite Environmental Incorporated
Project: Old Stoneway Renton/266-008
Sample Matrix: Water

Service Request: K1707772
Date Collected: NA
Date Received: NA

Carbonyls by High Performance Liquid Chromatography

Sample Name: Method Blank
Lab Code: KWG1706247-4
Extraction Method: METHOD
Analysis Method: 8315A

Units: ug/L
Basis: NA
Level: Low

| Analyte Name | Result | Q | MRL | Dilution Factor | Date Extracted | Date Analyzed | Extraction Lot | Note |
|--------------|--------|---|-----|-----------------|----------------|---------------|----------------|------|
| Formaldehyde | ND | U | 100 | 1 | 07/25/17 | 07/25/17 | KWG1706247 | |

Comments: _____

QA/QC Report

Client: Onsite Environmental Incorporated
Project: Old Stoneway Renton/266-008
Sample Matrix: Water

Service Request: K1707772
Date Extracted: 07/25/2017
Date Analyzed: 07/25/2017

Matrix Spike/Duplicate Matrix Spike Summary
Carbonyls by High Performance Liquid Chromatography

Sample Name: MW-10-0727017
Lab Code: K1707772-005
Extraction Method: METHOD
Analysis Method: 8315A

Units: ug/L
Basis: NA
Level: Low
Extraction Lot: KWG1706247

| Analyte Name | Sample Result | MW-10-0727017MS KWG1706247-1 Matrix Spike | | | MW-10-0727017DMS KWG1706247-2 Duplicate Matrix Spike | | | %Rec Limits | RPD | RPD Limit |
|--------------|---------------|---|--------------|------|--|--------------|------|-------------|-----|-----------|
| | | Result | Spike Amount | %Rec | Result | Spike Amount | %Rec | | | |
| Formaldehyde | ND | 408 | 500 | 82 | 393 | 500 | 79 | 47-117 | 4 | 30 |

Results flagged with an asterisk (*) indicate values outside control criteria.

Results flagged with a pound (#) indicate the control criteria is not applicable.

Percent recoveries and relative percent differences (RPD) are determined by the software using values in the calculation which have not been rounded.

Client: Onsite Environmental Incorporated
Project: Old Stoneway Renton/266-008
Sample Matrix: Water

Service Request: K1707772
Date Extracted: 07/25/2017
Date Analyzed: 07/25/2017

Lab Control Spike Summary
Carbonyls by High Performance Liquid Chromatography

Extraction Method: METHOD
Analysis Method: 8315A

Units: ug/L
Basis: NA
Level: Low
Extraction Lot: KWG1706247

Lab Control Sample
 KWG1706247-3
Lab Control Spike

| Analyte Name | Result | Spike Amount | %Rec | %Rec Limits |
|--------------|--------|--------------|------|-------------|
| Formaldehyde | 325 | 500 | 65 | 58-118 |

Results flagged with an asterisk (*) indicate values outside control criteria.

Percent recoveries and relative percent differences (RPD) are determined by the software using values in the calculation which have not been rounded.



Analytical Laboratory Testing Services
14648 NE 95th Street • Redmond, WA 98052
Phone: (425) 883-3881 • www.onsite-env.com

Chain of Custody

Company: Farrallon
 Project Number: 2166-008
 Project Name: Old Stoneway Renton
 Project Manager: P. Kingston
 Sampled by: AB

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

Laboratory Number: 07-204

| Lab ID | Sample Identification | Date Sampled | Time Sampled | Matrix | Number of Containers | |
|-----------|-----------------------|--------------|--------------|--------|----------------------|---|
| 1 | MW-1-072017 | 7-20-17 | 11:38 | Water | | 3 |
| 2 | EPI-MW-072017 | | 12:15 | | | |
| 3 | EPI-MW-7-072017 | | 13:24 | | | |
| 4 | EPI-MW-9-072017 | | 14:31 | | | |
| 5 | MW-10-072017 | | 15:22 | | | |
| <u>AB</u> | | | | | | |

| | | | | | | | | | | | | | | | | | | | | |
|------------|---------------|----------|---|-----------------|-----------------------------|----------------------------|---|----------------------------|------------|---------------------------------|---------------------------------------|-----------------------------------|-------------------|-------------------|-------------|----------------------------|---|---------------------------------|-----------------------------|------------|
| NWTPH-HCID | NWTPH-Gx/BTEX | NWTPH-Gx | NWTPH-Dx (<input type="checkbox"/> Acid / SG Clean-up) | Volatiles 8260C | Halogenated Volatiles 8260C | EDB EPA 8011 (Waters Only) | Semivolatiles 8270D/SIM (with low-level PAHs) | PAHs 8270D/SIM (low-level) | PCBs 8082A | Organochlorine Pesticides 8081B | Organophosphorus Pesticides 8270D/SIM | Chlorinated Acid Herbicides 8151A | Total RCRA Metals | Total MTCA Metals | TCLP Metals | HEM (oil and grease) 1664A | X Dissolved Arsenic by EPA Method 200.8 | X TPH by Standard Method 4500.H | X Formaldehyde by EPA 8315A | % Moisture |
|------------|---------------|----------|---|-----------------|-----------------------------|----------------------------|---|----------------------------|------------|---------------------------------|---------------------------------------|-----------------------------------|-------------------|-------------------|-------------|----------------------------|---|---------------------------------|-----------------------------|------------|

| Signature | Company | Date | Time | Comments/Special Instructions |
|--------------------|------------------|---|--------------|--|
| <u>[Signature]</u> | <u>Farrallon</u> | <u>7-20-17</u> | <u>17:40</u> | <u>Please filter for dissolved metals.</u> |
| <u>[Signature]</u> | <u>Onsite</u> | <u>7-20-17</u> | <u>17:40</u> | |
| Relinquished | | | | |
| Received | | | | |
| Relinquished | | | | |
| Received | | | | |
| Reviewed/Date | Reviewed/Date | Data Package: Standard <input type="checkbox"/> Level III <input type="checkbox"/> Level IV <input type="checkbox"/> Chromatograms with final report <input type="checkbox"/> Electronic Data Deliverables (EDDs) <input type="checkbox"/> | | |

APPENDIX B
TERRESTRIAL ECOLOGICAL EVALUATION FORM

**FOCUSED FEASIBILITY STUDY AND DISPROPORTIONATE COST
ANALYSIS**

**Old Stoneway Renton Property
1915 Southeast Maple Valley Highway
Renton, Washington**

Farallon PN: 266-008



Voluntary Cleanup Program

Washington State Department of Ecology
Toxics Cleanup Program

TERRESTRIAL ECOLOGICAL EVALUATION FORM

Under the Model Toxics Control Act (MTCA), a terrestrial ecological evaluation is necessary if hazardous substances are released into the soils at a Site. In the event of such a release, you must take one of the following three actions as part of your investigation and cleanup of the Site:

1. Document an exclusion from further evaluation using the criteria in WAC 173-340-7491.
2. Conduct a simplified evaluation as set forth in WAC 173-340-7492.
3. Conduct a site-specific evaluation as set forth in WAC 173-340-7493.

When requesting a written opinion under the Voluntary Cleanup Program (VCP), you must complete this form and submit it to the Department of Ecology (Ecology). The form documents the type and results of your evaluation.

Completion of this form is not sufficient to document your evaluation. You still need to document your analysis and the basis for your conclusion in your cleanup plan or report.

If you have questions about how to conduct a terrestrial ecological evaluation, please contact the Ecology site manager assigned to your Site. For additional guidance, please refer to www.ecy.wa.gov/programs/tcp/policies/terrestrial/TEEHome.htm.

Step 1: IDENTIFY HAZARDOUS WASTE SITE

Please identify below the hazardous waste site for which you are documenting an evaluation.

Facility/Site Name: Stoneway Concrete Renton

Facility/Site Address: 1915 Southeast Maple Valley Highway, Renton, Washington

Facility/Site No: 62244377

VCP Project No.: NW1702

Step 2: IDENTIFY EVALUATOR

Please identify below the person who conducted the evaluation and their contact information.

Name: J. Riley Conkin

Title: Principal Geologist

Organization: Farallon Consulting, L.L.C.

Mailing address: 975 5th Avenue Northwest

City: Issaquah

State: WA

Zip code: 98027

Phone: 425-295-0800

Fax: 425-295-0850

E-mail: rconkin@farallonconsulting.com

Step 3: DOCUMENT EVALUATION TYPE AND RESULTS

A. Exclusion from further evaluation.

1. Does the Site qualify for an exclusion from further evaluation?

- Yes *If you answered "YES," then answer **Question 2**.*
- No or Unknown *If you answered "NO" or "UNKNOWN," then skip to **Step 3B** of this form.*

2. What is the basis for the exclusion? Check all that apply. Then skip to **Step 4** of this form.

Point of Compliance: WAC 173-340-7491(1)(a)

- All soil contamination is, or will be,* at least 15 feet below the surface.
- All soil contamination is, or will be,* at least 6 feet below the surface (or alternative depth if approved by Ecology), and institutional controls are used to manage remaining contamination.

Barriers to Exposure: WAC 173-340-7491(1)(b)

- All contaminated soil, is or will be,* covered by physical barriers (such as buildings or paved roads) that prevent exposure to plants and wildlife, and institutional controls are used to manage remaining contamination.

Undeveloped Land: WAC 173-340-7491(1)(c)

- There is less than 0.25 acres of contiguous[#] undeveloped[±] land on or within 500 feet of any area of the Site and any of the following chemicals is present: chlorinated dioxins or furans, PCB mixtures, DDT, DDE, DDD, aldrin, chlordane, dieldrin, endosulfan, endrin, heptachlor, heptachlor epoxide, benzene hexachloride, toxaphene, hexachlorobenzene, pentachlorophenol, or pentachlorobenzene.
- For sites not containing any of the chemicals mentioned above, there is less than 1.5 acres of contiguous[#] undeveloped[±] land on or within 500 feet of any area of the Site.

Background Concentrations: WAC 173-340-7491(1)(d)

- Concentrations of hazardous substances in soil do not exceed natural background levels as described in WAC 173-340-200 and 173-340-709.

* An exclusion based on future land use must have a completion date for future development that is acceptable to Ecology.

[±] "Undeveloped land" is land that is not covered by building, roads, paved areas, or other barriers that would prevent wildlife from feeding on plants, earthworms, insects, or other food in or on the soil.

[#] "Contiguous" undeveloped land is an area of undeveloped land that is not divided into smaller areas of highways, extensive paving, or similar structures that are likely to reduce the potential use of the overall area by wildlife.

B. Simplified evaluation.

1. Does the Site qualify for a simplified evaluation?

- Yes *If you answered "YES," then answer **Question 2** below.*
- No or Unknown *If you answered "NO" or "UNKNOWN," then skip to **Step 3C** of this form.*

2. Did you conduct a simplified evaluation?

- Yes *If you answered "YES," then answer **Question 3** below.*
- No *If you answered "NO," then skip to **Step 3C** of this form.*

3. Was further evaluation necessary?

- Yes *If you answered "YES," then answer **Question 4** below.*
- No *If you answered "NO," then answer **Question 5** below.*

4. If further evaluation was necessary, what did you do?

- Used the concentrations listed in Table 749-2 as cleanup levels. *If so, then skip to **Step 4** of this form.*
- Conducted a site-specific evaluation. *If so, then skip to **Step 3C** of this form.*

5. If no further evaluation was necessary, what was the reason? Check all that apply. Then skip to **Step 4** of this form.

Exposure Analysis: WAC 173-340-7492(2)(a)

- Area of soil contamination at the Site is not more than 350 square feet.
- Current or planned land use makes wildlife exposure unlikely. Used Table 749-1.

Pathway Analysis: WAC 173-340-7492(2)(b)

- No potential exposure pathways from soil contamination to ecological receptors.

Contaminant Analysis: WAC 173-340-7492(2)(c)

- No contaminant listed in Table 749-2 is, or will be, present in the upper 15 feet at concentrations that exceed the values listed in Table 749-2.
- No contaminant listed in Table 749-2 is, or will be, present in the upper 6 feet (or alternative depth if approved by Ecology) at concentrations that exceed the values listed in Table 749-2, and institutional controls are used to manage remaining contamination.
- No contaminant listed in Table 749-2 is, or will be, present in the upper 15 feet at concentrations likely to be toxic or have the potential to bioaccumulate as determined using Ecology-approved bioassays.
- No contaminant listed in Table 749-2 is, or will be, present in the upper 6 feet (or alternative depth if approved by Ecology) at concentrations likely to be toxic or have the potential to bioaccumulate as determined using Ecology-approved bioassays, and institutional controls are used to manage remaining contamination.

C. Site-specific evaluation. A site-specific evaluation process consists of two parts: (1) formulating the problem, and (2) selecting the methods for addressing the identified problem. Both steps require consultation with and approval by Ecology. See WAC 173-340-7493(1)(c).

1. Was there a problem? See WAC 173-340-7493(2).

- Yes *If you answered "YES," then answer **Question 2** below.*
- No *If you answered "NO," then identify the reason here and then skip to **Question 5** below:*
- No issues were identified during the problem formulation step.
 - While issues were identified, those issues were addressed by the cleanup actions for protecting human health.

2. What did you do to resolve the problem? See WAC 173-340-7493(3).

- Used the concentrations listed in Table 749-3 as cleanup levels. *If so, then skip to **Question 5** below.*
- Used one or more of the methods listed in WAC 173-340-7493(3) to evaluate and address the identified problem. *If so, then answer **Questions 3 and 4** below.*

3. If you conducted further site-specific evaluations, what methods did you use?

Check all that apply. See WAC 173-340-7493(3).

- Literature surveys.
- Soil bioassays.
- Wildlife exposure model.
- Biomarkers.
- Site-specific field studies.
- Weight of evidence.
- Other methods approved by Ecology. If so, please specify:

4. What was the result of those evaluations?

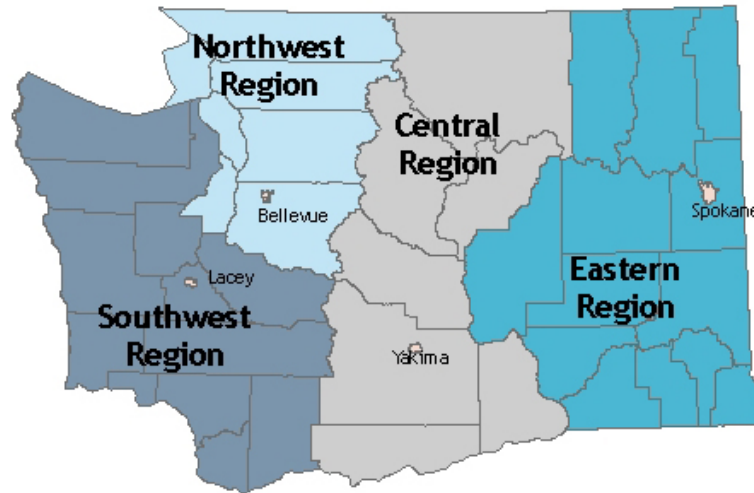
- Confirmed there was no problem.
- Confirmed there was a problem and established site-specific cleanup levels.

5. Have you already obtained Ecology's approval of both your problem formulation and problem resolution steps?

- Yes If so, please identify the Ecology staff who approved those steps:
- No

Step 4: SUBMITTAL

Please mail your completed form to the Ecology site manager assigned to your Site. If a site manager has not yet been assigned, please mail your completed form to the Ecology regional office for the County in which your Site is located.



| | |
|---|---|
| <p>Northwest Region: Attn: VCP Coordinator 3190 160th Ave. SE Bellevue, WA 98008-5452</p> | <p>Central Region: Attn: VCP Coordinator 15 W. Yakima Ave., Suite 200 Yakima, WA 98902</p> |
| <p>Southwest Region: Attn: VCP Coordinator P.O. Box 47775 Olympia, WA 98504-7775</p> | <p>Eastern Region: Attn: VCP Coordinator N. 4601 Monroe Spokane WA 99205-1295</p> |

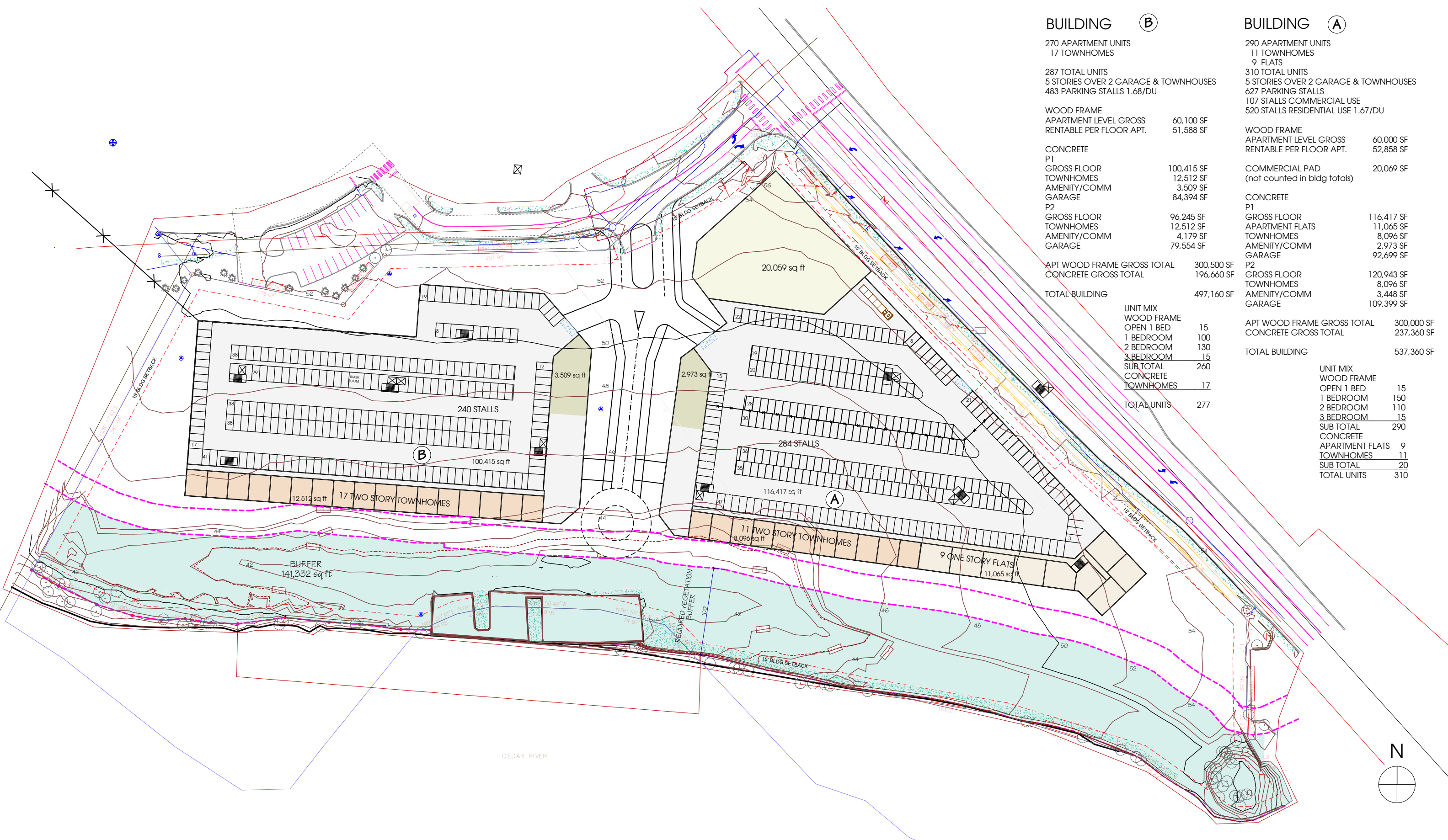
If you need this publication in an alternate format, please call the Toxics Cleanup Program at 360-407-7170. Persons with hearing loss can call 711 for Washington Relay Service. Persons with a speech disability can call 877-833-6341.

APPENDIX C
PRELIMINARY REDEVELOPMENT SITE PLAN

**FOCUSED FEASIBILITY STUDY AND DISPROPORTIONATE COST
ANALYSIS**

Old Stoneway Renton Property
1915 Southeast Maple Valley Highway
Renton, Washington

Farallon PN: 266-008



BUILDING (B)

270 APARTMENT UNITS
17 TOWNHOMES

287 TOTAL UNITS
5 STORIES OVER 2 GARAGE & TOWNHOUSES
483 PARKING STALLS 1.68/DU

WOOD FRAME
APARTMENT LEVEL GROSS 60,100 SF
RENTABLE PER FLOOR APT. 51,588 SF

CONCRETE
P1
GROSS FLOOR 100,415 SF
TOWNHOMES 12,512 SF
AMENITY/COMM 3,509 SF
GARAGE 84,394 SF
P2
GROSS FLOOR 96,245 SF
TOWNHOMES 12,512 SF
AMENITY/COMM 4,179 SF
GARAGE 79,554 SF

APT WOOD FRAME GROSS TOTAL 300,500 SF
CONCRETE GROSS TOTAL 196,660 SF
TOTAL BUILDING 497,160 SF

| UNIT MIX | |
|--------------------|------------|
| WOOD FRAME | |
| OPEN 1 BED | 15 |
| 1 BEDROOM | 100 |
| 2 BEDROOM | 130 |
| 3 BEDROOM | 15 |
| SUB TOTAL | 260 |
| CONCRETE | |
| TOWNHOMES | 17 |
| TOTAL UNITS | 277 |

BUILDING (A)

290 APARTMENT UNITS
11 TOWNHOMES
9 FLATS
310 TOTAL UNITS
5 STORIES OVER 2 GARAGE & TOWNHOUSES
627 PARKING STALLS
107 STALLS COMMERCIAL USE
520 STALLS RESIDENTIAL USE 1.67/DU

WOOD FRAME
APARTMENT LEVEL GROSS 60,000 SF
RENTABLE PER FLOOR APT. 52,858 SF

CONCRETE
P1
GROSS FLOOR 116,417 SF
APARTMENT FLATS 11,065 SF
TOWNHOMES 8,096 SF
AMENITY/COMM 2,973 SF
GARAGE 92,699 SF
P2
GROSS FLOOR 120,943 SF
TOWNHOMES 8,096 SF
AMENITY/COMM 3,448 SF
GARAGE 109,399 SF

APT WOOD FRAME GROSS TOTAL 300,000 SF
CONCRETE GROSS TOTAL 237,360 SF

TOTAL BUILDING 537,360 SF

| UNIT MIX | |
|--------------------|------------|
| WOOD FRAME | |
| OPEN 1 BED | 15 |
| 1 BEDROOM | 150 |
| 2 BEDROOM | 110 |
| 3 BEDROOM | 15 |
| SUB TOTAL | 290 |
| CONCRETE | |
| APARTMENT FLATS | 9 |
| TOWNHOMES | 11 |
| SUB TOTAL | 20 |
| TOTAL UNITS | 310 |

APPENDIX D
DRAFT ENVIRONMENTAL COVENANT AND SUPPORTING
DOCUMENTATION

FOCUSED FEASIBILITY STUDY AND DISPROPORTIONATE COST
ANALYSIS

Old Stoneway Renton Property
1915 Southeast Maple Valley Highway
Renton, Washington

Farallon PN: 266-008

**Text highlighted by yellow are instructions/comments and options.
Those instructions and related footnotes should be removed from the Covenant.**

After Recording Return
Original Signed Covenant to: ¹
Mr. Michael Warfel
Toxics Cleanup Program
Department of Ecology
3190 160th Ave SE
Bellevue, WA 98008

NOTE: This Covenant is not valid without Ecology's approval and signature.

Environmental Covenant

(For MTCA Sites – August 20, 2015 Version)

Grantor: SRMRENTON LLC

Grantee: State of Washington, Department of Ecology (hereafter “Ecology”)

Brief Legal Description:

POR OF SE 17-23-05 BEING KNOWN AS REV LEGAL DESC OF EXHIBIT E OF BOUNDARY LINE AGREEMENT REC #20090112001505 APPROVED BY CITY OF RENTON DAVID CHRISTENSEN DATED 01-22-09 SEE SURVEY 20090112900011

Tax Parcel Nos.: King County 172305-9026

Cross Reference: **NFA Opinion (pending)**

RECITALS ²

- a.** This document is an environmental (restrictive) covenant (hereafter “Covenant”) executed pursuant to the Model Toxics Control Act (“MTCA”), chapter 70.105D RCW, and Uniform Environmental Covenants Act (“UECA”), chapter 64.70 RCW.
- b.** The Property that is the subject of this Covenant is part or all of a site commonly known as **Stoneway Concrete Renton; Facility/Site No.: 62244377; VCP No.: NW1702; Cleanup Site ID No.: 2121**. The Property is legally described in Exhibit A, and illustrated in Exhibit B, both of which are attached (hereafter “Property”). If there are differences between these two Exhibits, the legal description in Exhibit A shall prevail.
- c.** The Property is the subject of remedial action conducted under MTCA. This Covenant is required because residual contamination remains on the Property after completion of remedial actions. Specifically, the following principal contaminants remain on the Property: ³

¹ Some counties keep the original Covenant, others don't. If the signed original is available, it must be sent to Ecology. If the signed original is not available, send a legible copy to Ecology.

² This section is primarily used to describe this document and its purpose. It should not be used for substantive binding provisions.

³ List the contaminants for the associated media. If more than a few are present, list the top three to five for each medium.

| Medium | Principal Contaminants Present |
|------------------------|--------------------------------|
| Soil | Residual elevated pH |
| Groundwater | Arsenic |
| Surface Water/Sediment | Not Applicable |

d. It is the purpose of this Covenant to restrict certain activities and uses of the Property to protect human health and the environment and the integrity of remedial actions conducted at the site. Records describing the extent of residual contamination and remedial actions conducted are available through Ecology. *Feasibility Study and Disproportionate Cost Analysis, Old Stoneway Renton Property, 1915 Southeast Maple Valley Highway, Renton, Washington* dated March 7, 2018, prepared by Farallon Consulting, L.L.C.

e. This Covenant grants Ecology certain rights under UECA and as specified in this Covenant. As a Holder of this Covenant under UECA, Ecology has an interest in real property, however, this is not an ownership interest which equates to liability under MTCA or the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. § 9601 *et seq.* The rights of Ecology as an “agency” under UECA, other than its’ right as a holder, are not an interest in real property.

COVENANT

SRMRENTON LLC, as Grantor ⁴ and owner of the Property hereby grants to the Washington State Department of Ecology, and its successors and assignees, the following covenants. Furthermore, it is the intent of the Grantor that such covenants shall supersede any prior interests the GRANTOR has in the property and run with the land and be binding on all current and future owners of any portion of, or interest in, the Property.

Section 1. General Restrictions and Requirements.

The following general restrictions and requirements shall apply to the Property:

a. **Interference with Remedial Action.** The Grantor shall not engage in any activity on the Property that may impact or interfere with the remedial action and any operation, maintenance, inspection or monitoring of that remedial action without prior written approval from Ecology.

b. **Protection of Human Health and the Environment.** The Grantor shall not engage in any activity on the Property that may threaten continued protection of human health or the environment without prior written approval from Ecology. This includes, but is not limited to, any activity that results in the release of residual contamination that was contained as a part of the remedial action or that exacerbates or creates a new exposure to residual contamination remaining on the Property.

c. **Continued Compliance Required.** Grantor shall not convey any interest in any portion of the Property without providing for the continued adequate and complete operation, maintenance and monitoring of remedial actions and continued compliance with this Covenant.

⁴ If there is more than one Grantor, use the term “Grantors” here and throughout this document.

d. Leases. Grantor shall restrict any lease for any portion of the Property to uses and activities consistent with this Covenant and notify all lessees of the restrictions on the use of the Property.

e. Preservation of Reference Monuments. Grantor shall make a good faith effort to preserve any reference monuments and boundary markers used to define the areal extent of coverage of this Covenant. Should a monument or marker be damaged or destroyed, Grantor shall have it replaced by a licensed professional surveyor within 30 days of discovery of the damage or destruction.

Section 2. Specific Prohibitions and Requirements.

In addition to the general restrictions in Section 1 of this Covenant, the following additional specific restrictions and requirements shall apply to the Property.

The Grantor shall not alter or remove the existing structures on the Property in any manner that would expose contaminated soil, result in a release to the environment of contaminants, or create a new exposure pathway, without prior written approval of Ecology. Should the Grantor propose to remove all or a portion of the existing structures illustrated in **[Exhibit B]** so that access to the underlying contamination is feasible, Ecology may require treatment or removal of the underlying soil with residual elevated pH.

The groundwater beneath **within the area of the Property illustrated in Exhibit B/C** remains contaminated and shall not be extracted for any purpose other than temporary construction dewatering, investigation, monitoring or remediation. Drilling of a well for any water supply purpose is strictly prohibited. Groundwater extracted **from the Property** for any purpose shall be considered potentially contaminated and any discharge of this water shall be done in accordance with state and federal law.

Several **groundwater monitoring wells** are located on the Property to monitor the performance of the remedial action. The Grantor shall maintain clear access to these devices and protect them from damage. The Grantor shall report to Ecology within forty-eight (48) hours of the discovery of any damage to any monitoring device. Unless Ecology approves of an alternative plan in writing, the Grantor shall promptly repair the damage and submit a report documenting this work to Ecology within thirty (30) days of completing the repairs.

Section 3. Access.

a. The Grantor shall maintain clear access to all remedial action components necessary to construct, operate, inspect, monitor and maintain the remedial action.

b. The Grantor freely and voluntarily grants Ecology and its authorized representatives, upon reasonable notice, the right to enter the Property at reasonable times to evaluate the effectiveness of this Covenant and associated remedial actions, and enforce compliance with this Covenant and those actions, including the right to take samples, inspect any remedial actions conducted on the Property, and to inspect related records.

c. No right of access or use by a third party to any portion of the Property is conveyed by this instrument.

Section 4. Notice Requirements.

a. Conveyance of Any Interest. The Grantor, when conveying any interest WITHIN THE AREA OF THE PROPERTY DESCRIBED AND ILLUSTRATED IN EXHIBITS B AND C], including but not limited to title, easement, leases, and security or other interests, must:

- i. Provide written notice to Ecology of the intended conveyance at least thirty (30) days in advance of the conveyance.⁵
- ii. Include in the conveying document a notice in substantially the following form, as well as a complete copy of this Covenant:

NOTICE: THIS PROPERTY IS SUBJECT TO AN ENVIRONMENTAL COVENANT GRANTED TO THE WASHINGTON STATE DEPARTMENT OF ECOLOGY ON [DATE] AND RECORDED WITH THE KING COUNTY AUDITOR UNDER RECORDING NUMBER [RECORDING NUMBER]. USES AND ACTIVITIES ON THIS PROPERTY MUST COMPLY WITH THAT COVENANT, A COMPLETE COPY OF WHICH IS ATTACHED TO THIS DOCUMENT.

- iii. Unless otherwise agreed to in writing by Ecology, provide Ecology with a complete copy of the executed document within thirty (30) days of the date of execution of such document.

b. Reporting Violations. Should the Grantor become aware of any violation of this Covenant, Grantor shall promptly report such violation in writing to Ecology.

c. Emergencies. For any emergency or significant change in site conditions due to Acts of Nature (for example, flood or fire) resulting in a violation of this Covenant, the Grantor is authorized to respond to such an event in accordance with state and federal law. The Grantor must notify Ecology in writing of the event and response actions planned or taken as soon as practical but no later than within 24 hours of the discovery of the event.

d. Notification procedure. Any required written notice, approval, reporting or other communication shall be personally delivered or sent by first class mail to the following persons. Any change in this contact information shall be submitted in writing to all parties to this Covenant. Upon mutual agreement of the parties to this Covenant, an alternative to personal delivery or first class mail, such as e-mail or other electronic means, may be used for these communications.

⁵ Ecology may waive this notice provision for some units at a Property where the anticipated use is a multi-tenant/owner building where some owners or tenants are unlikely to be exposed to residual contamination. For example: upper story apartments or condominiums, or commercial tenants in a strip mall, with limited rights to use the grounds under and around the building (such as for parking).

If Ecology agrees to such a waiver, the circumstances of the waiver must be detailed in paragraph 4.a.i. In addition to the specific circumstances, this provision must include the following statement: "Waiver of this advance notice to Ecology for these transactions does not constitute waiver of this notice for the entire Property nor a waiver of the requirement in Section 4.a.ii. to include this notice in any document conveying interest in the Property."

| | |
|------------------------|---|
| <i>Mr. Jimmy Blais</i> | Environmental Covenants Coordinator Washington State Department of Ecology Toxics Cleanup Program P.O. Box 47600 Olympia, WA 98504 – 7600 (360) 407-6000 ToxicsCleanupProgramHQ@ecy.wa.gov |
|------------------------|---|

Section 5. Modification or Termination.

a. Grantor must provide written notice and obtain approval from Ecology at least sixty (60) days in advance of any proposed activity or use of the Property in a manner that is inconsistent with this Covenant. ⁶ For any proposal that is inconsistent with this Covenant and permanently modifies an activity or use restriction at the site: ⁷

i. Ecology must issue a public notice and provide an opportunity for the public to comment on the proposal; and

ii. If Ecology approves of the proposal, the Covenant must be amended to reflect the change before the activity or use can proceed.

b. If the conditions at the site requiring a Covenant have changed or no longer exist, then the Grantor may submit a request to Ecology that this Covenant be amended or terminated. Any amendment or termination of this Covenant must follow the procedures in MTCA and UECA and any rules promulgated under these chapters.

c. **[Optional]** By signing this agreement, per RCW 64.70.100, the original signatories to this agreement, other than Ecology, agree to waive all rights to sign amendments to and termination of this Covenant. ⁸

Section 6. Enforcement and Construction.

a. This Covenant is being freely and voluntarily granted by the Grantor.

b. Within ten (10) days of execution of this Covenant, Grantor shall provide Ecology with an original signed Covenant and proof of recording and a copy of the Covenant and proof of recording to others required by RCW 64.70.070.

c. Ecology shall be entitled to enforce the terms of this Covenant by resort to specific performance or legal process. All remedies available in this Covenant shall be in addition to any

⁶ Example of inconsistent uses are using the Property for a use not allowed under the covenant (i.e. mixed residential and commercial use on a property restricted to industrial uses), OR drilling a water supply well when use of the groundwater for water supply is prohibited by the covenant.

⁷ An example of an activity that is unlikely to be considered a permanent modification is a proposal to disturb a cap to repair an existing underground utility that passes through the site. However, installing a new underground utility within a capped area would be a permanent change.

⁸ As time passes, the original grantor and other signers of the Covenant may no longer exist as viable entities. This provision is intended to allow future amendments or termination of the Covenant without Ecology having to seek court authorization, as provided by RCW 64.70.100.

and all remedies at law or in equity, including MTCA and UECA. Enforcement of the terms of this Covenant shall be at the discretion of Ecology, and any forbearance, delay or omission to exercise its rights under this Covenant in the event of a breach of any term of this Covenant is not a waiver by Ecology of that term or of any subsequent breach of that term, or any other term in this Covenant, or of any rights of Ecology under this Covenant.

d. The Grantor shall be responsible for all costs associated with implementation of this Covenant. Furthermore, the Grantor, upon request by Ecology, shall be obligated to pay for Ecology’s costs to process a request for any modification or termination of this Covenant and any approval required by this Covenant.

e. This Covenant shall be liberally construed to meet the intent of MTCA and UECA.

f. The provisions of this Covenant shall be severable. If any provision in this Covenant or its application to any person or circumstance is held invalid, the remainder of this Covenant or its application to any person or circumstance is not affected and shall continue in full force and effect as though such void provision had not been contained herein.

g. A heading used at the beginning of any section or paragraph or exhibit of this Covenant may be used to aid in the interpretation of that section or paragraph or exhibit but does not override the specific requirements in that section or paragraph.

[GRANTOR’S SIGNATURE BLOCK FOR ORIGINAL COVENANTS]

Each person who signs must have a separate signature block and applicable notary acknowledgment. Repeat as many times as necessary.

Holders of other property interests must either sign the amended Covenant as a GRANTOR or sign the subordination agreement in Exhibit D.

The undersigned Grantor warrants he/she holds the title **to the Property** and has authority to execute this Covenant.

EXECUTED this _____ day of _____, 20__.

_____ **[SIGNATURE]** _____

by: _____ Kent Angier _____

Title: _____

Insert one of the following, as applicable after each signature. See example format on page after next:

INDIVIDUAL ACKNOWLEDGMENT

CORPORATE ACKNOWLEDGMENT

REPRESENTATIVE ACKNOWLEDGEMENT

INDIVIDUAL ACKNOWLEDGMENT

STATE OF _____
COUNTY OF _____

On this _____ day of _____, 20__, I certify that _____ personally appeared before me, acknowledged that **he/she** is the individual described herein and who executed the within and foregoing instrument and signed the same at **his/her** free and voluntary act and deed for the uses and purposes therein mentioned.

Notary Public in and for the State of Washington ⁹
Residing at _____
My appointment expires _____

CORPORATE ACKNOWLEDGMENT

STATE OF _____
COUNTY OF _____

On this _____ day of _____, 20__, I certify that _____ personally appeared before me, acknowledged that **he/she** is the _____ of the corporation that executed the within and foregoing instrument, and signed said instrument by free and voluntary act and deed of said corporation, for the uses and purposes therein mentioned, and on oath stated that **he/she** was authorized to execute said instrument for said corporation.

Notary Public in and for the State of Washington ¹⁵
Residing at _____
My appointment expires _____

REPRESENTATIVE ACKNOWLEDGEMENT

STATE OF _____
COUNTY OF _____

On this _____ day of _____, 20__, I certify that _____ personally appeared before me, acknowledged that **he/she** signed this instrument, on oath stated that **he/she** was authorized to execute this instrument, and acknowledged it as the _____ [**TYPE OF AUTHORITY**] of _____ [**NAME OF PARTY BEING REPRESENTED**] to be the free and voluntary act and deed of such party for the uses and purposes mentioned in the instrument.

Notary Public in and for the State of Washington ¹⁵
Residing at _____
My appointment expires _____

⁹ Where landowner is located out of state, replace with appropriate out-of-state title and location.

[ECOLOGY'S SIGNATURE BLOCK]

The Department of Ecology, hereby accepts the status as GRANTEE and HOLDER of the above Environmental Covenant.

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

_____ [SIGNATURE] _____

by: _____ [PRINTED NAME] _____

Title: _____

Dated: _____

STATE ACKNOWLEDGMENT

STATE OF _____

COUNTY OF _____

On this _____ day of _____, 20__, I certify that _____ personally appeared before me, acknowledged that **he/she** is the _____ of the state agency that executed the within and foregoing instrument, and signed said instrument by free and voluntary act and deed, for the uses and purposes therein mentioned, and on oath stated that **he/she** was authorized to execute said instrument for said state agency.

Notary Public in and for the State of Washington

Residing at _____

My appointment expires _____

Exhibit A

LEGAL DESCRIPTION

Exhibit B

PROPERTY MAP

Addendum Report Figure 3

Exhibit C

MAP ILLUSTRATING LOCATION OF RESTRICTIONS

While a map illustrating the location of the restrictions is required, the grantor has the option of creating a separate map or including this information in Exhibit B.

More than one map may be necessary to illustrate the area subject to restrictions. For example, the area encompassing a soil cap may be different than the area where vapor or groundwater contamination is a concern.

The area subject to the restrictions, if less than the entire property, should be a contiguous area with even boundaries that follow physical features on the site so the boundary can be easily discerned in the field.

USE ADDENDUM FIGURES 6, 8, AND 9

Exhibit D

SUBORDINATION AGREEMENT

KNOW ALL PERSONS, That ___ [HOLDER'S NAME] ___, the owner and holder of that certain ___ [INSTRUMENT – E.G. EASEMENT/ROW/MORTGAGE/ETC.] ___ bearing the date the _____ day of ___ [MONTH] ___, ___ [YEAR] ___, executed by ___ [NAME OF PERSON THAT GRANTED THE INTEREST BEING SUBORDINATED] ___, ___ [LEGAL STATUS OF ORIGINAL GRANTOR – E.G. LANDOWNER, CORPORATE OFFICER, ETC.] ___, and recorded in the office of the County Auditor of ___ [COUNTY] ___ County, State of Washington, on ___ [DATE] ___, under Auditor's File Number _____, does hereby agree that said Instrument shall be subordinate to the interest of the State of Washington, Department of Ecology, under the environmental (restrictive) covenant dated ___ [DATE] ___, executed by ___ [NAME OF PERSON SIGNING THIS SUBORDINATION AGREEMENT] ___, and recorded in ___ [COUNTY] ___ County, Washington under Auditor's File Number _____.

_____ [SIGNATURE] _____

by: _____ [PRINTED NAME] _____

Title: _____

Dated: _____

Insert one of the following, as applicable. See example format on next page:

INDIVIDUAL ACKNOWLEDGMENT

CORPORATE ACKNOWLEDGMENT

REPRESENTATIVE ACKNOWLEDGEMENT

INDIVIDUAL ACKNOWLEDGMENT

STATE OF _____
COUNTY OF _____

On this _____ day of _____, 20__, I certify that _____ personally appeared before me, acknowledged that **he/she** is the individual described herein and who executed the within and foregoing instrument and signed the same at **his/her** free and voluntary act and deed for the uses and purposes therein mentioned.

Notary Public in and for the State of Washington ¹⁰
Residing at _____
My appointment expires _____

CORPORATE ACKNOWLEDGMENT

STATE OF _____
COUNTY OF _____

On this _____ day of _____, 20__, I certify that _____ personally appeared before me, acknowledged that **he/she** is the _____ of the corporation that executed the within and foregoing instrument, and signed said instrument by free and voluntary act and deed of said corporation, for the uses and purposes therein mentioned, and on oath stated that **he/she** was authorized to execute said instrument for said corporation.

Notary Public in and for the State of Washington ¹⁶
Residing at _____
My appointment expires _____

REPRESENTATIVE ACKNOWLEDGEMENT

STATE OF _____
COUNTY OF _____

On this _____ day of _____, 20__, I certify that _____ personally appeared before me, acknowledged that **he/she** signed this instrument, on oath stated that **he/she** was authorized to execute this instrument, and acknowledged it as the _____ [**TYPE OF AUTHORITY**] of _____ [**NAME OF PARTY BEING REPRESENTED**] to be the free and voluntary act and deed of such party for the uses and purposes mentioned in the instrument.

Notary Public in and for the State of Washington ¹⁶
Residing at _____
My appointment expires _____

¹⁰ Where landowner is located out of state, replace with appropriate out-of-state title and location.

APPENDIX 1

EXAMPLE SITE-SPECIFIC COVENANT PROVISIONS**a. Land Use.** ¹¹

Option 1 Industrial Land Use: The remedial action for the Property is based on a cleanup designed for industrial property. As such, the Property shall be used in perpetuity only for industrial uses, as that term is defined in the rules promulgated under Chapter 70.105D RCW. Prohibited uses on the Property include but are not limited to residential uses, childcare facilities, K-12 public or private schools, parks, grazing of animals, growing of food crops, and non-industrial commercial uses.

Option 2 Commercial Land Use: The remedial action for the Property is based on a cleanup designed for commercial property. As such, the Property shall be used in perpetuity only for commercial land uses as that term is defined in the rules promulgated under Chapter 70.105D RCW. Prohibited uses on the Property include but are not limited to residential uses, childcare facilities, K-12 public or private schools, parks, grazing of animals, and growing of food crops.

Option 3 Park: The remedial action for the Property is based on a cleanup designed for a public park. As such, the Property shall be used in perpetuity only for a public park. Prohibited uses on the Property include but are not limited to residential uses, childcare facilities, K-12 public or private schools, grazing of animals, and growing of food crops.

Option 4 [Specify other land use limitations as appropriate.]

b. Containment of Soil/Waste Materials. ¹²

[Use where contaminated soil or solid or hazardous waste remains on the property.]

The remedial action for the Property is based on containing contaminated soil **[and waste materials]** under a cap consisting of **[Insert a description of the cap]** ¹³ and located as illustrated in **[Exhibit B/C]** ¹⁴. The primary purpose of this cap is to **[Insert purpose of cap]**. ¹⁵ As such, the following restrictions shall apply within the area illustrated in **[Exhibit B/C]** ¹⁶:

Option 1 [Use where a cap is required.] Any activity on the Property that will compromise the integrity of the cap including: drilling; digging; piercing the cap with sampling device, post, stake or similar device; grading; excavation; installation of underground utilities; removal of the cap; or, application of loads in excess of the cap load bearing capacity, is prohibited without prior written approval by Ecology. The Grantor shall report to Ecology within forty-eight (48) hours of the discovery of any damage to the cap. Unless an alternative plan has been approved by Ecology in writing, the Grantor shall promptly repair the damage and submit a report documenting this work to Ecology within thirty (30) days of completing the repairs.

¹¹ Use one of these restrictions only if the underlying zoning allows the use.

¹² Waste materials means solid wastes as defined in Chapter 70.95 RCW or hazardous wastes as defined in Chapter 70.105 RCW and the rules promulgated under these statutes.

¹³ Such as: an X foot thick layer of clean soil; an engineered cap consisting of X inches of clean soil overlying a X mil thick geomembrane and/or clay layer; asphalt pavement; an X square foot building, etc.]

¹⁴ Be very clear in describing or diagramming where the contamination is located relative to a legally defined benchmark such as a property line or survey monument; or use a legal description.

¹⁵ Such as: minimize the potential for contact with contaminated soil; minimize leaching of contaminants to groundwater and surface water; prevent runoff from contacting contaminated soil; minimize airborne contaminants. A cap may have multiple purposes.

¹⁶ NOTE: More than one exhibit may be necessary to illustrate the area restricted by this and other limitations.

Option 2 [Use when contamination is left behind under a building.]

The Grantor shall not alter or remove the existing structures on the Property in any manner that would expose contaminated soil [and waste materials], result in a release to the environment of contaminants, or create a new exposure pathway, without prior written approval of Ecology. Should the Grantor propose to remove all or a portion of the existing structures illustrated in [Exhibit B/C] so that access to the underlying contamination is feasible, Ecology may require treatment or removal of the underlying contaminated soil [and waste materials].

Option 3: [Use when periodic inspections of a cap/building are included.]

The Grantor covenants and agrees that it shall annually, or at another time as approved in writing by Ecology, inspect the [cap/building] and report within thirty (30) days of the inspection the condition of the [cap/building] and any changes to the [cap/building] that would impair its performance.

c. Stormwater facilities. [Use when infiltration needs to be controlled to minimize leaching from soil or waste materials, or spreading of groundwater contamination.]

To minimize the potential for mobilization of contaminants remaining in the [soil/waste materials/groundwater] on the Property, no stormwater infiltration facilities or ponds shall be constructed [on the Property] OR [within the area of the Property illustrated in Exhibit B/C]. All stormwater catch basins, conveyance systems, and other appurtenances located within this area shall be of water-tight construction.¹⁷

d. Vapor/gas controls. [Use when vapors and/or methane gas are a concern. An example of when this provision would be appropriate is if a soil cap or a groundwater conditional point of compliance are being used to address volatile contaminants remaining on the property.]

The residual contamination on the Property includes [volatile chemicals that may generate harmful vapors] and/or [biodegradable wastes/chemicals that may generate methane, a combustible gas]. As such, the following restrictions shall apply [on the Property] or [within the area of the Property illustrated in Exhibit B/C] to minimize the potential for exposure to these vapors:

1. No building or other enclosed structure shall be constructed [on the Property/within this area] unless approved by Ecology.
2. If a building or other enclosed structure is approved, it shall be constructed with a sealed foundation and a [vapor/gas] control system that is operated and maintained to prevent the migration of [vapors/gas] into the building or structure, unless an alternative approach is approved by Ecology.

e. Groundwater Use. [Use when groundwater use restrictions are required.]

The groundwater beneath [the Property] OR [within the area of the Property illustrated in Exhibit B/C] remains contaminated and shall not be extracted for any purpose other than temporary construction dewatering, investigation, monitoring or remediation. Drilling of a well for any water supply purpose is strictly prohibited. Groundwater extracted [from the

¹⁷ NOTE: Most local ordinances require on-site infiltration of runoff. If redevelopment of the Property is anticipated, the cleanup plan should reserve an area for this infiltration to occur without exacerbating leaching of residual soil contamination or enhancing movement of contaminants within the groundwater.

Property/within this area] for any purpose shall be considered potentially contaminated and any discharge of this water shall be done in accordance with state and federal law.

f. Sediments. [Use for sediment cleanup sites.] ¹⁸

The residual contamination on the Property includes contaminated sediments. As such, the following restrictions shall apply to minimize potential disturbance of these sediments **[on the Property] OR [within the area of the Property illustrated in Exhibit B/C]**:

Option 1 [Use where a cap is required.] Any activity **[on the Property/within this area]** that will compromise the integrity of the cap including: drilling; digging; piercing the cap with sampling device, post, stake or similar device; excavation; installation of buried utilities; removal of the cap; or, application of loads in excess of the cap load bearing capacity, is prohibited without prior written approval by Ecology. The Grantor shall report to Ecology within forty-eight (48) hours of the discovery of any damage to the cap. Unless an alternative plan has been approved by Ecology in writing, the Grantor shall promptly repair the damage and submit a report documenting this work to Ecology within thirty (30) days of completing the repairs.

Option 2 No docks or other structures shall be constructed **[on the Property/within this area]** without prior written approval of Ecology.

Option 3 No dredging shall be allowed **[on the Property/within this area]** without prior written approval of Ecology.

Option 4 No ships or boats shall be allowed to anchor or use side thrusters **[on the Property/within this area]**. A no wake zone shall be enforced and ships and boats shall be limited to a draft depth of **[XX]** feet **[on the Property/within this area]**.

Option 5 No digging for clams, setting of crab pots or fishing nets, anchoring of mooring buoys or channel markers, or similar activities that could disturb the surface of the sediment shall be allowed **[on the Property/within this area]** without prior written approval of Ecology.

g. Monitoring. [Use for long-term protection of monitoring devices.]

Several **[groundwater monitoring wells, vapor probes, etc.]** are located on the Property to monitor the performance of the remedial action. The Grantor shall maintain clear access to these devices and protect them from damage. The Grantor shall report to Ecology within forty-eight (48) hours of the discovery of any damage to any monitoring device. Unless Ecology approves of an alternative plan in writing, the Grantor shall promptly repair the damage and submit a report documenting this work to Ecology within thirty (30) days of completing the repairs.

h. Other.

[Add other property-specific use or activity restrictions and affirmative obligations that are necessary but not identified above. Examples include special remedy-specific requirements such as restrictions on structures over leachate/groundwater collection systems, or protection requirements for cut-off walls or sheet piling.]

¹⁸ NOTE: Sediment restrictions are currently evolving. Additional guidance can be found in Ecology's Sediment Cleanup Users Manual II (SCUM II), Publication No. 12-09-057, located at: <https://fortress.wa.gov/ecy/publications/SummaryPages/1209057.html>

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ATTACHMENT B
REQUEST FOR OPINION FORM

REQUEST FOR WRITTEN OPINION
Focused Feasibility Study and Disproportionate Cost Analysis
Old Stoneway Renton Property
1915 Southeast Maple Valley Highway
Renton, Washington

Farallon PN: 266-008



Voluntary Cleanup Program

Washington State Department of Ecology
Toxics Cleanup Program

REQUEST FOR OPINION FORM

Use this form to request a written opinion on your planned or completed independent remedial action under the Voluntary Cleanup Program (VCP). Attach to this form the plans or reports documenting the remedial action. Please submit only one form for each request.

Step 1: IDENTIFY HAZARDOUS WASTE SITE

Please identify below the hazardous waste site for which you are requesting a written opinion under the VCP. This information may be found on the VCP Agreement.

Facility/Site Name: Stoneway Concrete Renton

Facility/Site Address: 1915 Maple Valley Highway, Renton, Washington 98055

Facility/Site No: 62244377

VCP Project No.: NW1702

Step 2: REQUEST WRITTEN OPINION ON PLAN OR REPORT

What type of independent remedial action plan or report are you submitting to Ecology for review under the VCP? Please check all that apply.

- Remedial investigation plan
- Remedial investigation report
- Feasibility study report
- Property cleanup* plan (* cleanup of one or more parcels located within the Site)
- Property cleanup* report
- Site cleanup plan
- Site cleanup report
- Other – please specify: Focused Feasibility Study and Disproportionate Cost Analysis

Do you want Ecology to provide you with a written opinion on the planned or completed independent remedial action?

- Yes No

Please note that Ecology's opinion will be limited to:

- Whether the planned or completed remedial action at the site meets the substantive requirements of the Model Toxics Control Act (MTCA), and/or
- Whether further remedial action is necessary at the site under MTCA.

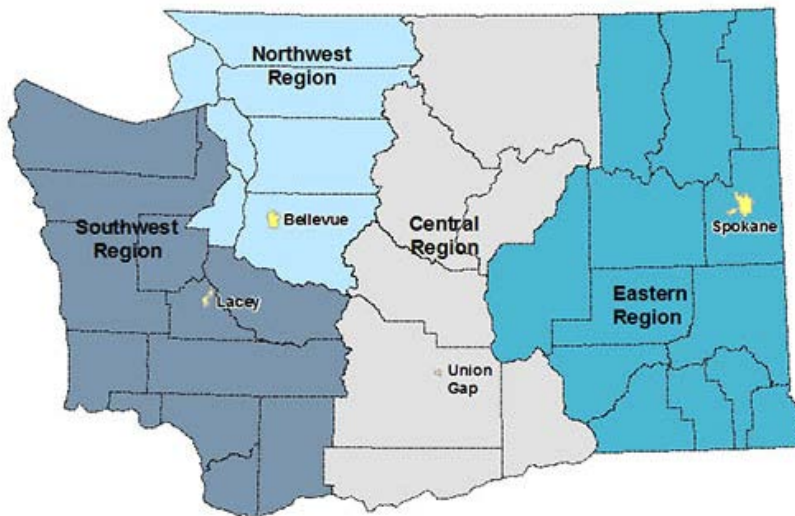
Step 3: REPRESENTATIONS AND SIGNATURE

The undersigned representative of the Customer hereby certifies that he or she is fully authorized to request services from Ecology under the Agreement for this VCP Project.

| | | |
|---|-----------|----------------------------|
| Name: Jimmy Blais | | Title: |
| Signature: | | Date: |
| Organization: Merlino Properties | | |
| Mailing address: 5050 1 st Avenue South, Suite 102 | | |
| City: Seattle | State: WA | Zip code: 98134 |
| Phone: 206-255-5153 | Fax: | E-mail: jblais@gmccinc.com |

Step 4: SUBMITTAL

Please mail your completed form and the independent remedial action plan or report that you are requesting Ecology review to the site manager Ecology assigned to your Site. If a site manager has not yet been assigned, please mail your completed form to the Ecology regional office for the County in which your Site is located.



| | |
|--|---|
| <p>Northwest Region: Attn: VCP Coordinator 3190 160th Ave. SE Bellevue, WA 98008-5452</p> | <p>Central Region: Attn: VCP Coordinator 1250 West Alder St. Union Gap, WA 98903-0009</p> |
| <p>Southwest Region: Attn: VCP Coordinator P.O. Box 47775 Olympia, WA 98504-7775</p> | <p>Eastern Region: Attn: VCP Coordinator N. 4601 Monroe Spokane WA 99205-1295</p> |