AUG 05 2003

SCS ENGINEERS

August 1, 2003 File No. 04202001.01

Jay Fisher Principal Capital Management 801 Grand Avenue Des Moines, IA 50392-1370

Subject:

Fifth Quarter, Groundwater Monitoring Event at the Former Chevron Gasoline

Station Site, Meeker Square, Kent, Washington

Dear Jay:

This letter describes the fifth round of quarterly groundwater monitoring at the former Chevron gasoline station site at the Meeker Square shopping center in Kent, Washington. The groundwater sampling was conducted on June 5, 2003.

Background

Standard Oil (Chevron) purchased the subject site and constructed a gasoline station in 1960 and 1961. The station had two fuel island canopies, one facing each of the two adjoining streets. The underground storage tanks (USTs) were removed from the site in 1983 when the business closed. Observations made during the soil remediation excavation suggested that the former fuel supply lines were left in place and the UST excavation was filled with building debris after the tanks were removed. Soil in the suspected former UST excavation was stained gray and had an obvious gasoline odor.

In April 2002, soils contaminated above MTCA Method A soil cleanup levels were removed to the extent practical. Limited contamination was inaccessible in the saturated soil at the center of the excavation, below electrical and irrigation utilities in the east portion of the south wall, and below electrical and irrigation utilities in the west portion of the south wall. Oxygen-Release Compound® (ORC) was mixed into the saturated soil in the base of the excavation to enhance the biological degradation of the petroleum hydrocarbon contamination. The Department of Ecology issued a no further action (NFA) designation for the soil on July 29, 2002.

Soil sample analytical results indicated that the contaminants were limited to gasoline-range petroleum hydrocarbons and xylenes. Benzene was detected in soils at the site only during an investigation by others conducted in 1998. No benzene was detected in any of the soil samples analyzed during the soil remediation project in April 2002.

Depending on seasonal variations, the depth to groundwater at the site is approximately 7.5 to 10.5 feet below grade. Water level data from the wells installed during the 1998 investigation indicated a southerly groundwater flow toward West Meeker Street. The Green River is located approximately 0.4 miles farther south.

Quarterly groundwater monitoring was initiated in June 2002. During the first year of groundwater monitoring, concentrations of benzene and gasoline-range total petroleum hydrocarbons (TPH) were identified in samples collected from well OW3, located at the southeast

Jay Fisher August 1, 2003 Page 2

corner of the property. No contaminants were identified in samples collected from any of the other monitoring wells at the site.

Groundwater Sampling

Four groundwater monitoring wells are present at the site: one well remains from the 1998 investigation (MW3-GS) and three wells were installed after the 2002 soil remediation activities (OW1, OW2, and OW3). Measurements of the depth to groundwater were recorded at each of the four wells at the site to facilitate calculating the groundwater flow direction.

On June 30, 2003, low-flow equipment (specifically, a peristaltic pump) was used to purge and sample the wells and produce groundwater samples with minimal turbidity. Groundwater quality parameters (pH, conductivity, dissolved oxygen content, and temperature) were measured during purging to evaluate when the parameters had stabilized and the wells had been sufficiently purged. The parameters were measured using a multi-probe, flow-through cell. Dissolved oxygen concentrations were low, ranging from 0.23 mg/L in OW3 to 0.46 mg/L in OW2.

The groundwater samples were collected in laboratory-supplied glassware, placed on ice in a field cooler, and transported to the laboratory with standard chain-of-custody documentation. Severn Trent Laboratory (STL) in Tacoma analyzed the samples for gasoline-range total petroleum hydrocarbons (TPH) and gasoline-constituent BTEX compounds (benzene, toluene, ethylbenzene, and xylenes). STL is accredited by the Department of Ecology for the analyses performed.

Groundwater Results

A summary of the analytical results of the fifth round of groundwater monitoring is provided below in Table 1. The complete analytical report is attached.

Table 1 Fifth Quarter Groundwater Sample Analytical Results in µg/L (Parts per Billion)

Sample Name	Gasoline-Range	BTEX Compounds			
-	TPH	Benzene	Toluene	Ethylbenzene	Xylenes
OW1	<100	<0.5	<1	<1	<2
OW2	<100	<0.5	<1	<1	<2
OW3	4,790	119	<10	114	76
MW3-GS	<100	<0.5	<1	<1	<3
MTCA Cleanup Level	800	5	1,000	700	1,000

Bold Indicates the concentration exceeds the MTCA Method A cleanup level.

The results of the fifth quarter of groundwater monitoring indicate that gasoline-range TPH and benzene are present in the groundwater at the southeast corner of the site (OW3). The gasoline concentration at OW3 is at a concentration of 4,790 μ g/L, which exceeds the MTCA Method A cleanup level of 800 μ g/L in groundwater. Benzene was detected in the same sample at a concentration of 119 μ g/L, which exceeds the MTCA Method A cleanup level of 5 μ g/L in groundwater. The samples from OW1, OW2, and the earlier-installed MW3-GS did not contain detectable concentrations of gasoline-range TPH or gasoline-constituent BTEX compounds.

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Groundwater Flow Direction

Two rounds of groundwater elevation measurements recorded in 2000 indicated a southerly groundwater flow direction toward West Meeker Street and the Green River. The groundwater gradient at the site was nearly flat.

Following the soil remediation in the spring of 2002, site restoration was completed coincident with the final efforts of a street-widening project by the City of Kent. The street project included the installation of small trees and new grass along the south edge of the property. Small trees were also installed on the east side of the property. Irrigation plumbing was installed to ensure the survival of the new plants.

On June 30, 2003, measurements of the depth to groundwater were recorded at the four groundwater monitoring wells at the former Chevron site. Measurement and survey data and the calculated water table elevations are provided in Table 2.

Table 2 Groundwater Elevation Data, June 2003

Well ID	Depth to Groundwater	Surveyed Well Elevation	Water Table Elevation
OW1	9.01	99.78	90.77
OW2	9.10	99.82	. 90.72
OW3	8.65	99.25	90.60
MW3-GS	9.61	100.21	90.60

Based on the groundwater elevation data from the June 2003 monitoring event, groundwater appears to be mounding beneath the planted strip at the south edge of the property. At the former Chevron site the local groundwater flow direction is east from the planting strip on the south end of the site. The gradient, due to suspected contribution from the landscape irrigation, was approximately 0.0085 feet per foot. Groundwater elevation data from the first post-remediation groundwater monitoring event (June 2002) indicated a southerly groundwater flow direction with a flatter gradient consistent with previous data collected in 2000.

Conclusions

Laboratory analytical results from the fifth groundwater monitoring event indicate that gasoline-range TPH is present at the southeast corner of the site (OW3) at a concentration of 4,790 μ g/L, which exceeds the MTCA Method A cleanup level of 800 μ g/L in groundwater. At the same location, benzene is also present in the groundwater at a concentration of 119 μ g/L, which exceeds the MTCA Method A cleanup level of 5 μ g/L in groundwater. Groundwater samples from the three other wells at the site did not contain detectable concentrations of gasoline-range TPH or gasoline-constituent BTEX compounds.

The irrigation applied to the planted strips at the south and east edges of the property is suspected of increasing surface water infiltration to such an extent that groundwater is mounding beneath the planting strip. Thus, the irrigation water has created a localized change in the groundwater flow direction, causing the groundwater to flow east to northeast onto the site from the planted strip at the south property boundary. Groundwater level data from the first post-remediation groundwater monitoring event (June 2002) indicated a southerly groundwater flow direction consistent with previous data collected in 2000.

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The results of the current monitoring event are consistent with those of the June 2002 monitoring event. The concentration of gasoline-range TPH was reported at 4,550 μ g/L in June 2002, compared with 4,790 μ g/L in June 2003. The benzene concentration was reported at125 μ g/L in June 2002, compared with 119 μ g/L in June 2003.

While some variability in the contaminant concentrations is noted for the first five monitoring events, additional data are needed to evaluate any apparent trends in the contaminant concentrations. However, it is notable that the gasoline and benzene concentrations are reduced from the September 2002 monitoring event when the highest levels were recorded. The monitoring plan for the former Chevron station site at Meeker Square includes three additional monitoring events. The next event is scheduled for late September 2003.

Thank you for the opportunity to provide our services. Please do not hesitate to call if you have any questions.

Sincerely,

cc:

Brian G. Doan Project Scientist

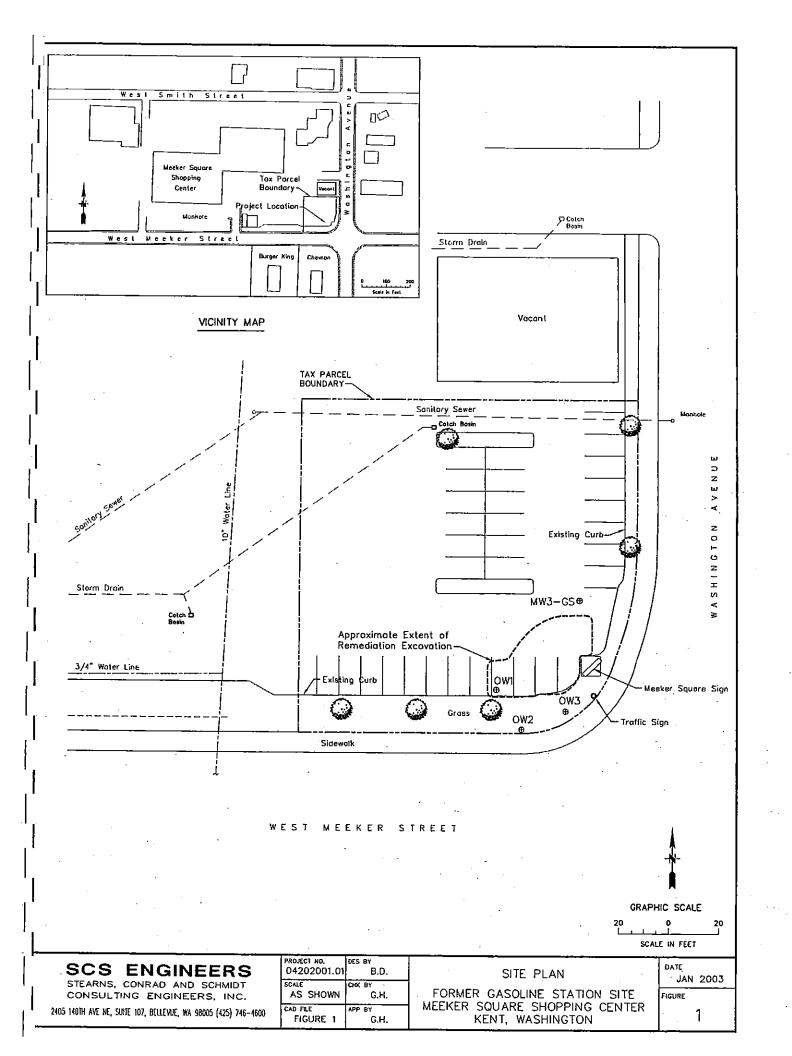
SCS ENGINEERS

Gregory D. Helland, R.G.

Project Director SCS ENGINEERS

Tim Wirta, Principal Capital Management

Grant Yang, Washington State Department of Ecology





STL Seattle 5755 8th Street East Tacoma, WA 98424

Tel: 253 922 2310 Fax: 253 922 5047 www.stl-inc.com

TRANSMITTAL MEMORANDUM

DATE: July 11, 2003

TO: Brian Doan SCS Engineers 2405 140th Ave. N. E., Suite 107 Bellevue, WA 98005

PROJECT: Meeker Former Gas Station

REPORT NUMBER: 114563

TOTAL NUMBER OF PAGES: _______

JUL 16 2003
SCS ENGINEERS-WA

Enclosed are the test results for five samples received at STL Seattle on July 1, 2003.

The report consists of this transmittal memo, analytical results, quality control reports, a copy of the chain-of-custody, a list of data qualifiers and analytical narrative when applicable, and a copy of any requested raw data.

Should there be any questions regarding this report, please contact me at (253) 922-2310.

Sincerely,

Darla Powell Project Manager

Sample Identification:

Lab. No.	Client 1D	Date/Time Sampled	<u>Matrix</u>
114563-1	OW1	06-30-03 16:50	Liquid
114563-2	OW2	06-30-03 17:41	Liquid
114563-3	OW3	06-30-03 18:13	Liquid
114563-4	MW3-GS	06-30-03 16:12	Liquid
114563-5	Dup	06-30-03 18:20	Liquid

 Client Name
 SCS Engineers

 Client ID:
 OW1

 Lab ID:
 114563-01

 Date Received:
 7/1/2003

 Date Prepared:
 7/7/2003

 Date Analyzed:
 7/7/2003

 % Solids

 Dilution Factor
 1

			Recovery Limits	
Surrogate	% Recovery	Flags	Low	High
Trifluorotoluene	104		82	120
Bromofluorobenzene	107		84	135
Pentafluorobenzene	107		90	121

Result		
(mg/L)	PQL	MRL Flags
ND	0.0005	0.00025
ND	0.001	0.0005
ND	0.001	0.0005
ND	0.002	0.001
ND	0.001	0.0005
	(mg/L) ND ND ND ND	(mg/L) PQL ND 0.0005 ND 0.001 ND 0.001 ND 0.002

Client Name	SCS Engineers
Client ID:	OW2
Lab ID:	114563-02
Date Received:	7/1/2003
Date Prepared:	7/7/2003
Date Analyzed:	7/7/2003
% Solids	-
Dilution Factor	1

			Recovery Limits	
Surrogate	% Recovery	Flags	Low	High
Trifluorotoluene	99.2		82	120
Bromofluorobenzene	104		84	135
Pentafluorobenzene	102		90	121

•	Result		
Analyte	(mg/L)	PQL	MRL Flags
Benzene	ND	0.0005	0.00025
Toluene	ND	0.001	0.0005
Ethylbenzene	ND	0.001	0.0005
m&p-Xylene	ND	0.002	0.001
o-Xylene	ND	0.001	0.0005

 Client Name
 SCS Engineers

 Client ID:
 OW3

 Lab ID:
 114563-03

 Date Received:
 7/1/2003

 Date Prepared:
 7/7/2003

 Date Analyzed:
 7/7/2003

 % Solids

 Dilution Factor
 10

			Recovery Limits	
Surrogate	% Recovery	Flags	Low	High
Trifluorotoluene	-	X8	82	120
Bromofluorobenzene	-	X8	84	135
Pentafluorobenzene	•	X8	90	121

	Result			
Analyte	(mg/L)	PQL	MRL	Flags
Benzene	0.119	0.005	0.0025	
Toluene ND		0.01	0.005	
Ethylbenzene	0.114	0.01	0.005	
m&p-Xylene	0.0711	0.02	0.01	
o-Xylene	0.00504	0.01	0.005	J

Client Name	SCS Engineers
Client ID:	MW3-GS
Lab ID:	114563-04
Date Received:	7/1/2003
Date Prepared:	7/7/2003
Date Analyzed:	7/7/2003
% Solids	-
Dilution Factor	1

		Recovery Limits	
% Recovery	Flags	Low	High
89		82	120
91.3		84	135
92.3		90	121
	89 91.3	89 91.3	% Recovery Flags Low 89 82 91.3 84

	Result		
Analyte	(mg/L)	PQL	MRL Flags
Benzene	ND	0.0005	0.00025
Toluene	ND .	0.001	0.0005
Ethylbenzene	ND	0.001	0.0005
m&p-Xylene	ND	0.002	0.001
o-Xylene	ND	0.001	0.0005

 Client Name
 SCS Engineers

 Client ID:
 DUP

 Lab ID:
 114563-05

 Date Received:
 7/1/2003

 Date Prepared:
 7/7/2003

 Date Analyzed:
 7/7/2003

 % Solids

 Dilution Factor
 10

			Recovery Limits	
Surrogate	% Recovery	Flags	Low	High
Trifluorotoluene	-	X8	82	120
Bromofluorobenzene	-	X8	84	135
Pentafluorobenzene	-	X8	90	121

		Result			
Analyte		(mg/L)	PQL	MRL	Flags
Benzene		0.114	0.005	0.0025	_
Toluene	ND		0.01	0.005	
Ethylbenzene		0.103	0.01	0.005	
m&p-Xylene	4	0.0636	0.02	0.01	
o-Xylene	ND		0.01	0.005	

 Client Name
 SCS Engineers

 Client ID:
 OW1

 Lab ID:
 114563-01

 Date Received:
 7/1/2003

 Date Prepared:
 7/2/2003

 Date Analyzed:
 7/2/2003

 % Solids

 Dilution Factor
 1

			Recov	ery Limits
Surrogate	% Recovery	Flags	Low	High
Trifluorotoluene	83.2		50	150
Bromofluorobenzene	92.3		50	150
Pentafluorobenzene	71.3		50	150

	Result		
Analyte	(mg/L)	PQL	Flags
Gasoline by NWTPH-G	ND	0.1	

 Client Name
 SCS Engineers

 Client ID:
 OW2

 Lab ID:
 114563-02

 Date Received:
 7/1/2003

 Date Prepared:
 7/2/2003

 Date Analyzed:
 7/3/2003

 % Solids

 Dilution Factor
 1

			Recov	ery Limits
Surrogate	% Recovery	Flags	Low	High
Trifluorotoluene	83.5	_	50	150
Bromofluorobenzene	92.9		50	150
Pentafluorobenzene	71.1		50	150

	Result		
Analyt e	(mg/L)	PQL	Flags
Gasoline by NWTPH-G	ND	0.1	

Client Name	SCS Engineers
	*
Cfient ID:	OW3
Lab ID:	114563-03
Date Received:	7/1/2003
Date Prepared:	7/2/2003
Date Analyzed:	7/3/2003
% Solids	· -
Dilution Factor	1

			Recov	ery Limits
Surrogate	% Recovery	Flags	Low	Hìgh
Trifluorotoluene	94.5		50	150
Bromofluorobenzene	98.2		50	150
Pentafluorobenzene	128		50	150

	Result		
Analyte	(mg/L)	PQL	Flags
Gasoline by NWTPH-G	4.79	0.1	

 Client Name
 SCS Engineers

 Client ID:
 MW3-GS

 Lab ID:
 114563-04

 Date Received:
 7/1/2003

 Date Prepared:
 7/2/2003

 Date Analyzed:
 7/3/2003

 % Solids

 Dilution Factor
 1

			Recove	
Surrogate	% Recovery	Flags	Low	High
Trifluorotoluene	83.6		50	150
Bromofluorobenzene	92.5		50	150
Pentafluorobenzene	71.4		50	150

	Result		
Analyte	(mg/L)	PQL	Flags
Gasoline by NWTPH-G	ND	0.1	

 Client Name
 SCS Engineers

 Client ID:
 DUP

 Lab ID:
 114563-05

 Date Received:
 7/1/2003

 Date Prepared:
 7/2/2003

 Date Analyzed:
 7/3/2003

 % Solids

 Dilution Factor
 1

			Recove	ery Limits
Surrogate	% Recovery	Flags	Low	High
Trifluorotoluene	91,2		50	150
Bromofluorobenzene	96.9		50	150
Pentafluorobenzene	133		50	150

•	Result		
Analyte	(mg/L)	PQL	Flags
Gasoline by NWTPH-G	4.39	0.1	

Lab ID:

Method Blank - GB3497

Date Received:

-

Date Prepared: Date Analyzed: 7/7/2003 7/7/2003

% Solids
Dilution Factor

-

			Recov	ery Limits
Surrogate	% Recovery	Flags	Low	High
Trifluorotoluene	107	•	82	120
Bromofluorobenzene	110		84	135
Pentafluorobenzene	111		90	. 121

•	Result		
Analyte	(mg/L)	PQL	MRL Flags
Benzene	ND	0.0005	0.00025
Toluene	ND	0.001	0.0005
Ethylbenzene	ЙD	0.001	0.0005
m&p-Xylene	ND	0.002	0.001
o-Xylene	ND	0.001	0.0005

Blank Spike/Blank Spike Duplicate Report

Lab ID: Date Prepared: Date Analyzed: GB3497 7/7/2003 7/7/2003 GB3497

QC Batch ID:

	Blank	Spike	BS		BSD			
	Result	Amount	Result	BS	Result	BSD		
Compound Name	(mg/L)	(mg/L)	(mg/L)	% Rec.	(mg/L)	% Rec.	RPD	Flag
Benzene	0	0.025	0.0266	106	0.0272	109	2.8	
Toluene	0	0.025	0.0269	108	0.0272	109	0.92	
Ethylbenzene	0	0.025	0.0252	101	0.0258	103	2	
m&p-Xylene	0	0.05	0.0547	109	0.0555	111	1.8	
o-Xylene	0	0.025	0.0266	106	0.0269	108	1.9	

Lab ID:

Method Blank - GB3492

Date Received:

.

Date Prepared:

7/2/2003

Date Analyzed: % Solids

7/2/2003

Dilution Factor

1

Volatile Petroleum Products by WSDOE Method NWTPH-Gx Modified

			Recov	ery Limits
Surrogate	% Recovery	Flags	Low	High
Trifluorotoluene	81.3		50	150
Bromofluorobenzene	90.2		50	150
Pentafluorobenzene	69.8		50	150

Analyte Result (mg/L)

PQL

Flags

Gasoline by NWTPH-G

ND

0.1

Blank Spike/Blank Spike Duplicate Report

Lab ID:

GB3492

Date Prepared:

7/2/2003

Date Analyzed: 7/2/2003 QC Batch ID:

GB3492

	Blank	Spike	BS		BSD			
	Result	Amount	Result	BS	Result	BSD		
Compound Name	(mg/L)	(mg/L)	(mg/L)	% Rec.	(mg/L)	% Rec.	RPD	Flag
Gasoline by NWTPH-G	0	1.25	1.19	95.3	1.2	96.3	1	



STL Seattle 5755 8th Street East Tacoma, WA 98424

Tel: 253 922 2310 Fax: 253 922 5047 www.stl-inc.com

'A QUALIFIERS AND ABBREVIATIONS

This analyte was detected in the associated method blank. The analyte concentration was determined not to be significantly higher than the associated method blank (less than ten times the concentration reported in the blank).

This analyte was detected in the associated method blank. The analyte concentration in the sample was determined to be significantly higher than the method blank (greater than ten times the concentration reported in the blank).

Second column confirmation was performed. The relative percent difference value (RPD) between the results on the two columns was evaluated and determined to be < 40%.

Second column confirmation was performed. The RPD between the results on the two columns was evaluated and determined to be > 40%. The higher result was reported unless anomalies were noted.

Second analysis confirmation was performed. The relative percent difference value (RPD) between the results on the two columns was evaluated and determined to be \leq 30%.

Second analysis confirmation was performed. The RPD between the results on the two columns was evaluated and determined to be > 30%. The original analysis was reported unless anomalies were noted.

GC/MS confirmation was performed. The result derived from the original analysis was reported.

The reported result for this analyte was calculated based on a secondary dilution factor.

The concentration of this analyte exceeded the instrument calibration range and should be considered an estimated quantity.

The analyte was analyzed for and positively identified, but the associated numerical value is an estimated quantity.

- L: Maximum Contaminant Level
- MDL: Method Detection Limit
 - .L: Method Reporting Limit
- See analytical narrative
- ধা: Not Detected

4

):

X4a.

- L: Practical Quantitation Limit
- 1: Contaminant does not appear to be "typical" product. Elution pattern suggests it may be ______.

Contaminant does not appear to be "typical" product.

Identification and quantitation of the analyte or surrogate was complicated by matrix interference.

RPD for duplicates was outside advisory QC limits. The sample was re-analyzed with similar results. The sample matrix may be nonhomogeneous.

RPD for duplicates outside advisory QC limits due to analyte concentration near the method practical quantitation limit/detection limit.

Matrix spike recovery was not determined due to the required dilution.

X6: Recovery and/or RPD values for matrix spike(/matrix spike duplicate) outside advisory QC limits. Sample was re-analyzed with similar results.

Recovery and/or RPD values for matrix spike(/matrix spike duplicate) outside advisory QC limits. Matrix interference may be indicated based on acceptable blank spike recovery and/or RPD.

- a: Recovery and/or RPD values for this spiked analyte outside advisory QC limits due to high concentration of the analyte in the original sample.
- X8: Surrogate recovery was not determined due to the required dilution.
- 3: Surrogate recovery outside advisory QC limits due to matrix interference.

Chain of Custody Record

Tacoma, WA 98424
Tel. 253-922-2310
Fax 253-922-5047
www.stl-inc.com

TRENT

lient	Project Manager		とりが続	Chain of Custody Number
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DISTRIBUTION: WHITE - Stays with the Samples; CANARY	- Returned to Clent with Report; BINK - Field	Сору	-	

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Well Location Softman	Observations (color, odor, anomalies, etc)	
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Well Location 2 3 3 4 61 67 1 2 3 5 7 4 1 5 6 1 2 9 8 7 7 4 1 5 6	Observations (color, odor, anomalies, etc)	
CONTROL SETTINGS: Refil	Turbidity Q 330	Signature
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Vater in Protector? YN		
MWZ-GS Station— MWZ-GS (Carely) MOSTU (Carely) DNS: Wocked? (YN) Comments:	DTW Temp. Sp.Cond. 2114 11758 0.544 4932 17358 0.544 10.15 1732 0.554 10.31 1732 0.555	Saine DILEU
SITE: //W/K WELL ID: //W/C DATE: ///C/S WEATHER: //W/O/S WELL CONDITIONS: SAMPLE CONTAINERS:	TIME (2) (2) (2) (3) (4) (4) (4) (4) (4) (4) (4) (4) (4) (4	SAMPLER: Pri

SCS ENGINEERS

GROUNDWATER SAMPLING INSTRUMENT CALIBRATION DOCUMENTATION FORM

Conductivity
4/3/103 (1/30/103
55.6 62.6
Sud North
NA) NA
souther solution
445 7.0
10.7 Sylv
0.6 Shh
Ú Ó
1125 1125
Mrs 18472

* If Direct Reading is Unavailable, Assume pressure = 760 mm - 2.5 (altitude in ft/100)