February 1, 2019

Mr. Nicholas Acklam VCP/II-SHA/LUST Unit Supervisor Toxics Cleanup Program – Southwest Regional Office Washington State Department of Ecology PO Box 47775 Olympia, Washington 98504-7775

BY EMAIL AND MAIL

RE: CONFIRMATIONAL GROUNDWATER MONITORING AND SAMPLING STATUS REPORT – 2018
FORMER EVERGREEN FUEL FACILITY
661 EAST PINE STREET
SHELTON, WASHINGTON
FARALLON PN: 863-001

Dear Mr. Acklam:

Farallon Consulting, L.L.C. (Farallon) has prepared this letter to present the results of the June and December 2018 confirmational groundwater monitoring and sampling events conducted at the former Evergreen Fuel Facility at 661 East Pine Street in Shelton, Washington (herein referred to as the Site) (Figure 1). The confirmational groundwater monitoring and sampling was conducted to evaluate whether constituents of concern (COCs), which include total petroleum hydrocarbons as gasoline-range organics (GRO), as diesel-range organics (DRO), and as oil-range organics (ORO); and/or benzene, toluene, ethylbenzene, and xylenes (BTEX), have attenuated to concentrations less than Washington State Model Toxics Control Act Cleanup Regulation (MTCA) Method A cleanup levels. The conformational groundwater sampling also was conducted to comply with the requirements set forth in the following:

- Draft Cleanup Action Plan, Evergreen Fuel Facility, 661 East Pine Street, Shelton, Washington dated July 18, 2006, prepared by Farallon (Draft Cleanup Action Plan);
- Agreed Order No. DE 3937 dated November 29, 2006, entered into by the Washington State Department of Ecology (Ecology) and Chevron U.S.A. Inc. and C.C. Cole and Sons, Inc. (AO);

- Letter regarding Transmittal of Ecology Comments on Request for No Further Action
 Determination and Revised Groundwater Monitoring Status Report May 2013,
 Evergreen Fuel Facility, 661 East Pine Street, Shelton Washington, Agreed Order No. DE
 3937, dated March 10, 2014 dated August 25, 2014, from Mr. Scott Rose of Ecology to
 Mr. Peter Jewett of Farallon (Ecology Comments Letter); and
- Email regarding Evergreen Fuels Monitoring dated August 6, 2015, from Mr. Jason Landskron of Ecology to Mr. Javan Ruark of Farallon (Ecology Email), detailing the required decommissioning of monitoring wells MW-5 and MW-6 based on historical concentrations of COCs not exceeding the laboratory practical quantitation limits (PQLs).

This letter includes a summary of the Site background information, details of the confirmational groundwater monitoring and sampling, a discussion of the sampling results, and conclusions.

SITE BACKGROUND

A cleanup action was completed under the AO that was entered into by Ecology and potentially liable persons Chevron U.S.A. Inc. and C.C. Cole and Sons, Inc. The cleanup action was completed in accordance with the scope of work documented in the Draft Cleanup Action Plan, which was reviewed and approved by Ecology. Details regarding the cleanup activities are presented in the Cleanup Action Summary Report, December 2006 to June 2007, Evergreen Fuel Facility, 661 East Pine Street, Shelton, Washington dated July 30, 2007, prepared by Farallon. A general description of the cleanup action activities pertinent to the ongoing confirmational groundwater monitoring being conducted is provided below.

Cleanup action activities completed in January 2007 included excavation and removal of 7,508 tons of soil containing COCs, which included GRO, DRO, ORO, and BTEX, at concentrations exceeding applicable regulatory cleanup levels. The excavation areas were backfilled with quarry spalls to above the water table at approximately 3 feet below ground surface. A total of 4,000 pounds of Advanced Oxygen Release Compound manufactured by Regenesis was mixed with the quarry spalls used for backfill beneath the water table prior to placement to enhance aerobic biodegradation of residual COCs in saturated soil and groundwater. Following completion of the

excavation portion of the cleanup action, an Environmental Covenant was placed on the Site prohibiting use of groundwater as a potable water source at the Site, and identifying areas where contaminated soil could not practicably be removed due to the presence of the bulkhead retaining wall, State Route 3, and utilities along State Route 3 (Figure 2). Confirmational groundwater monitoring and sampling were initiated to document the effects of the source removal action and ongoing biodegradation of the residual COCs in groundwater. The Site currently is unpaved and used as a parking lot for the Port of Shelton Marina.

Confirmational groundwater monitoring and sampling conducted from 2007 to 2013 indicate that source removal and oxygen release compound treatment have resulted in a reduction of COCs, with overall decreasing to stable conditions throughout the Site. However, DRO was detected at concentrations exceeding the MTCA Method A cleanup level in six of eight groundwater samples collected from monitoring well MW-10 during the 2007 to 2013 time period.

Farallon submitted a letter regarding Request for No Further Action Determination, Evergreen Fuel Facility, 661 East Pine Street, Shelton, Washington, from Messrs. Ruark and Jewett to Mr. Dominick Reale of Ecology, on March 10, 2014 (Request Letter). In response to the Request Letter and as detailed in the Ecology Comments Letter, Ecology indicated that additional performance soil and confirmational groundwater monitoring and sampling were required to receive a No Further Action determination for the Site. The additional performance soil and confirmational groundwater monitoring and sampling required by Ecology included the following:

- Collecting additional soil samples at locations where residual COCs were left in-place to
 determine whether current concentrations are less than MTCA Method A cleanup levels
 for protection of groundwater. If concentrations of residual COCs still exceed MTCA
 Method A cleanup levels, the locations with the highest concentrations of DRO will be
 used to develop Site-specific Method B cleanup levels for direct contact and protection of
 groundwater.
- Performing semiannual confirmational groundwater monitoring and sampling at existing
 Site monitoring wells until MTCA Method A cleanup levels have been achieved and

maintained for 1 year at all monitoring wells required to be sampled, as detailed in the AO. Once the groundwater analytical results indicate that COCs are less than MTCA Method A cleanup levels for 1 year, four consecutive quarters of confirmational groundwater monitoring and sampling will be conducted to demonstrate that MTCA Method A cleanup levels for groundwater have been achieved for the Site. Neither of these guidelines have been attained for DRO in monitoring well MW-10.

Ecology subsequently provided additional details regarding the confirmational groundwater monitoring and sampling to occur at the Site. The details were provided in the Ecology Email and included the following:

- Confirmational groundwater monitoring and sampling will be conducted in accordance the AO and will include monitoring wells MW-8 through MW-10; and
- Monitoring wells MW-5 and MW-6, which were covered during regrading activities for the parking lot at the Site, are to be located and decommissioned in accordance with Chapter 173-160 of the Washington Administrative Code.

Monitoring well decommissioning activities were conducted in December 2017. The required soil sampling work will not be required by Ecology as a component of the ongoing confirmational groundwater monitoring and sampling until groundwater quality meets MTCA Method A cleanup levels for all COCs at the Site, and confirmation of achieving the cleanup standards in the media of concern is necessary to support a closure request. The required confirmational groundwater monitoring and sampling is described in the sections that follow.

CONFIRMATIONAL GROUNDWATER MONITORING AND SAMPLING

Confirmational groundwater monitoring and sampling events were conducted on June 28 and December 27, 2018 at monitoring wells MW-8 through MW-10 (Figure 2). The confirmational groundwater monitoring included measuring the depth to groundwater at all accessible monitoring wells and collecting groundwater samples for laboratory analysis from monitoring wells MW-8 through MW-10. Upon Farallon's arrival at the Site, monitoring wells MW-8 through MW-10

Page 5

were opened, and the water level was permitted to equilibrate with atmospheric pressure for a minimum of 15 minutes before groundwater levels in the wells were measured. Groundwater

levels were measured to an accuracy of 0.01 foot using a water-level meter.

Monitoring wells MW-8 through MW-10 were purged and sampled using a peristaltic pump and

dedicated polyethylene tubing at a flow rate of 200 milliliters per minute. The tubing intake was

placed at approximately 2 to 3 feet below the top of the water table in each monitoring well. During

purging, water quality was monitored using a YSI water-quality meter equipped with a flow-

through cell. The water-quality parameters monitored and recorded included temperature, pH,

specific conductance, dissolved oxygen, turbidity, and oxidation-reduction potential. Each

monitoring well was purged until water-quality parameters temperature, pH, specific conductance,

dissolved oxygen, and oxidation-reduction potential stabilized.

Following purging, groundwater samples were collected directly from the pump outlet tubing

located upstream of the flow-through cell and placed directly into laboratory-prepared sample

containers. The containers were placed on ice in a cooler and transported under standard chain-of-

custody protocols to OnSite Environmental Inc. of Redmond, Washington for laboratory analysis

for DRO and ORO by Northwest Method NWTPH-Dx. Analysis for GRO and BTEX was not

performed based on the following:

• Previous analytical data demonstrated that concentrations of GRO and/or BTEX were less

than MTCA Method A cleanup levels in samples collected from the Site for four

consecutive quarters; and

• Ecology did not request further analysis for GRO or BTEX in the Ecology Comments

Letter.

Purge water generated during the confirmational groundwater monitoring and sampling was placed

into a labeled 55-gallon steel drum and stored on the Site.

DRAFT—Issued for Regulatory Review

RESULTS

The results from the field activities and the laboratory analytical results for the confirmational groundwater monitoring and sampling events conducted on June 28 and December 28, 2018 are presented below. The groundwater-level measurements and elevations are summarized in Table 1. Groundwater elevation contours for the June 28 and December 27, 2018 confirmational groundwater monitoring events are shown on Figures 3 and 4, respectively. Groundwater analytical results are summarized in Table 2 and shown on Figure 5. Figures 6 and 7 depict the trends in concentrations of DRO and groundwater elevations at monitoring wells MW-9 and MW-10, respectively. The groundwater geochemical parameters are summarized in Table 3. The laboratory analytical reports are provided in Attachment A.

The June 28 and December 27, 2018 groundwater elevation data indicate a southeastern groundwater flow direction toward Oakland Bay (Figures 3 and 4). During the June 28, 2018 confirmational groundwater monitoring event, groundwater levels were measured during a low tide cycle, which had a minimum height of -1.48 feet below mean sea level at 1:53 p.m. according National Service tidal prediction Ocean data to (https://tidesandcurrents.noaa.gov/noaatidepredictions.html?id=9446628&units=standard&bdate =20180628&edate=20180628&timezone=LST/LDT&clock=12hour&datum=MLLW&interval= hilo&action=dailychart) as accessed on January 17, 2019. During the December 27, 2018 confirmational groundwater monitoring event, groundwater levels were measured during a high tide cycle, which had a maximum height of 16.29 feet above mean sea level at 10:25 a.m. according **National** Ocean to the Service tidal prediction data (https://tidesandcurrents.noaa.gov/noaatidepredictions.html?id=9446628&units=standard&bdate =20181227&edate=20181227&timezone=LST/LDT&clock=12hour&datum=MLLW&interval= hilo&action=dailychart) as accessed on January 17, 2019.

Groundwater analytical results for monitoring well MW-10 included the following:

- DRO was detected at concentrations exceeding the MTCA Method A cleanup level during the June 28 and December 27, 2018 confirmational groundwater monitoring and sampling events (Table 2; Figure 5); and
- ORO was not detected at concentrations exceeding laboratory PQLs during the June 28 and December 27, 2018 confirmational groundwater monitoring and sampling events (Table 2; Figure 5).

Groundwater analytical results for monitoring well MW-9 included the following:

- DRO was detected at a concentration exceeding the laboratory PQL but less than the MTCA Method A cleanup level during the December 27, 2018 confirmational groundwater monitoring and sampling event (Table 2; Figure 5). DRO was not detected at a concentration exceeding the laboratory PQL during the June 28, 2018 confirmational groundwater monitoring and sampling event.
- ORO was not detected at concentrations exceeding laboratory PQLs during the June 28 and December 27, 2018 confirmational groundwater monitoring and sampling events (Table 2; Figure 5).

Groundwater analytical results for monitoring well MW-8 included the following:

• DRO and ORO were not detected at concentrations exceeding laboratory PQLs during the June 28 and December 27, 2018 confirmational groundwater monitoring and sampling events (Table 2; Figure 5).

CONCLUSIONS

DRO and ORO concentrations at monitoring wells MW-8 and MW-9 were less than the MTCA Method A cleanup levels, which is consistent with the historical DRO and ORO concentration trends at these monitoring wells.

The highest detected concentrations of DRO during the 2018 confirmational groundwater monitoring and sampling events were observed at monitoring well MW-10 on December 27, 2018, which correlates with seasonal high groundwater elevation data (Figure 7). The DRO concentration trend at monitoring well MW-10 indicates that concentrations of DRO historically have correlated with groundwater elevation data beginning in May 2013 (Figure 7), which is consistent with historical groundwater monitoring data indicating that shallow groundwater is not tidally influenced. Concentrations of DRO detected in groundwater during the July and December 2018 confirmational groundwater monitoring and sampling events were less than the concentrations of DRO detected in groundwater during the July and December 2017 confirmational groundwater monitoring and sampling events. Residual soil contamination proximate to monitoring well MW-10 that was left in-place following the cleanup activities may be desorbing from the soil matrix at times when groundwater is in direct contact with affected soil. The residual soil contamination likely is up- or cross-gradient of monitoring well MW-10. The prior remedial investigation work leading up to the cleanup action has indicated that DRO and associated compounds comprising the petroleum release(s) in the shallow groundwater do not pose a threat to human or marine receptors. The fluctuations in DRO concentrations observed do not require further action to protect human health and the environment. Continued monitoring will be required to evaluate the stability of DRO in groundwater in this area of the Site.

The results from the confirmational groundwater sampling conducted from 2007 to 2018 demonstrate that soil contamination left in-place is continuing to result in an exceedance of the MTCA Method A cleanup level for DRO in groundwater at monitoring well MW-10, and that further confirmational groundwater monitoring and sampling is warranted at the Site to comply with the AO and evaluate whether further action is required to meet the cleanup action objectives.

CLOSING

Farallon trusts that this report provides sufficient information for your needs. Please contact either of the undersigned at (425) 295-0800 if you have questions or require additional information.

Sincerely,

Farallon Consulting, L.L.C.

Javan Ruark, L.G. Jeffrey Kaspar, L.G., L.H.G. Associate Geologist Principal Geologist

Attachments: Figure 1, Site Vicinity Map

Figure 2, Site Plan

Figure 3, Groundwater Elevation Contours and Flow Direction, June 28, 2018 Figure 4, Groundwater Elevation Contours and Flow Direction, December 27, 2018

Figure 5, Groundwater Analytical Data

Figure 6, DRO Concentrations versus Groundwater Elevation Data Trends for

Monitoring Well MW-9

Figure 7, DRO Concentrations versus Groundwater Elevation Data Trends for

Monitoring Well MW-10

Table 1, Summary of Groundwater Elevation Data Table 2, Summary of Groundwater Analytical Results

Table 3, Summary of Groundwater Geochemical Parameters

Attachment A, Laboratory Analytical Reports

cc: William Joyce, Joyce Ziker Parkinson, PLLC (by email)

Brandon Palmer, Port of Shelton (by email)

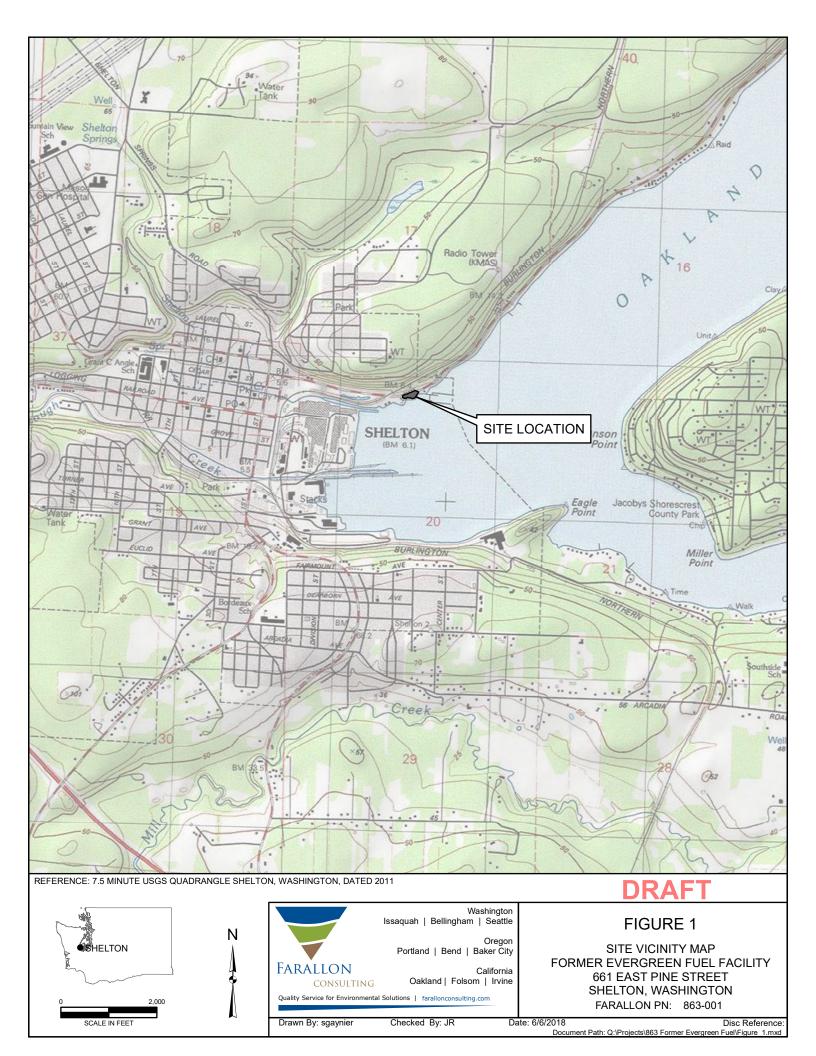
Dan Carrier, Chevron U.S.A. Inc (by email)

JR/JK:mm

FIGURES

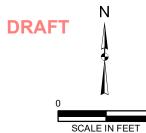
CONFIRMATIONAL GROUNDWATER MONITORING AND SAMPLING
STATUS REPORT – 2018
Former Evergreen Fuel Facility
661 East Pine Street
Shelton, Washington

Farallon PN: 863-001





- -⊙- UTILITY POLE
- FIRE HYRDANT
- MONITORING WELL (FARALLON 2005 AND 2007)
- DECOMMISSIONED MONITORING WELL (FARALLON 2017)
- BULKHEAD RETAINING WALL
- APPROXIMATE SITE BOUNDARY





Washington Issaquah | Bellingham | Seattle

Oregon Portland | Bend | Baker City

Oakland | Folsom | Irvine

FIGURE 2

SITE PLAN FORMER EVERGREEN FUEL FACILITY 661 EAST PINE STREET SHELTON, WASHINGTON

FARALLON PN: 863-001

18 Disc Reference: Document Path: Q:\Projects\863 Former Evergreen Fuel\Figure 2 SitePlan.mxd



UTILITY POLE

FIRE HYRDANT

MONITORING WELL (FARALLON 2005 AND 2007)

DECOMMISSIONED MONITORING WELL (FARALLON 12/14/2017)

SITE BOUNDARY

(DASHED WHERE INFERRED)

GROUNDWATER FLOW DIRECTION

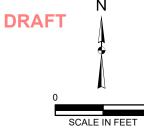
(13.06)

GROUNDWATER ELEVATION (06/28/18)

NOTES:

1. ALL LOCATIONS ARE APPROXIMATE.

2. FIGURES WERE PRODUCED IN COLOR.
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GROUNDWATER ELEVATION CONTOURS AND FLOW DIRECTION JUNE 28, 2018
FORMER EVERGREEN FUEL FACILITY
661 EAST PINE STREET SHELTON, WASHINGTON

FARALLON PN: 863-001

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FIRE HYRDANT

MONITORING WELL (FARALLON 2005 AND 2007)

DECOMMISSIONED MONITORING WELL (FARALLON 12/14/2017)

SITE BOUNDARY

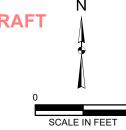
GROUNDWATER FLOW DIRECTION

(13.57)GROUNDWATER ELEVATION (12/27/18)

NOTES:

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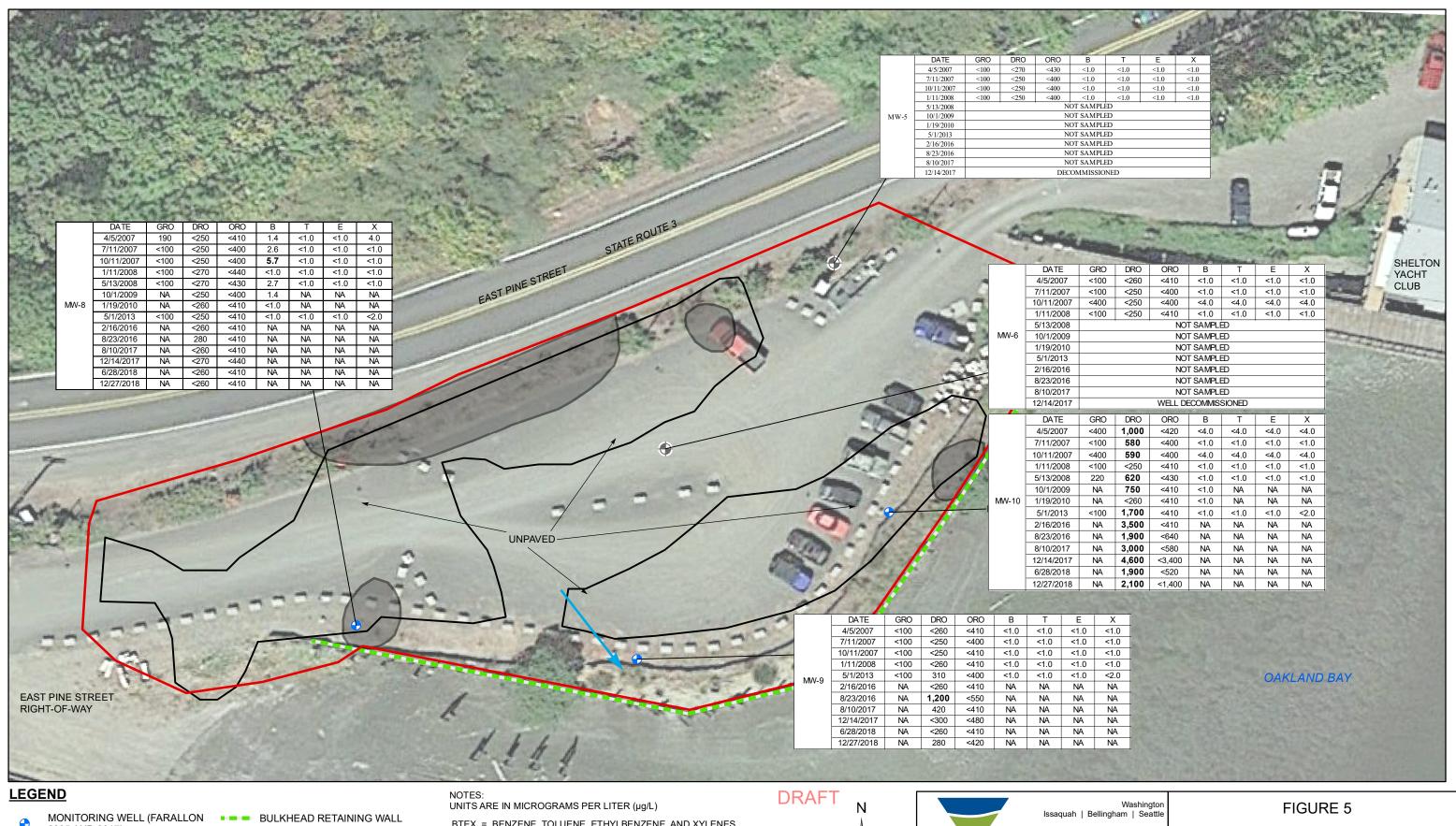




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GROUNDWATER ELEVATION CONTOURS AND FLOW DIRECTION DECEMBER 27, 2018 FORMER EVERGREEN FUEL FACILITY 661 EAST PINE STREET SHELTON, WASHINGTON FARALLON PN: 863-001

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2005 AND 2017)

DECOMMISSIONED MONITORING WELL (FARALLON



APPROXIMATE SITE BOUNDARY

INFERRED GROUNDWATER FLOW DIRECTION

FORMER EXCAVATION

RESIDUAL SOIL **CONTAMINATION AREA**

1. ALL LOCATIONS ARE APPROXIMATE.

2. FIGURES WERE PRODUCED IN COLOR. GRAYSCALE COPIES MAY NOT REPRODUCE ALL ORIGINAL INFORMATION.

BTEX = BENZENE, TOLUENE, ETHYLBENZENE, AND XYLENES

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

GRO = TPH AS GASOLINE-RANGE ORGANICS ORO = TPH AS OIL-RANGE ORGANICS

NA = SAMPLE NOT ANALYZED FOR ANALYTE

BOLD = CONCENTRATIONS THAT EXCEED THE WASHINGTON STATE MODEL TOXICS CONTROL ACT (MTCA) METHOD A CLEANUP LEVEL

= ANALYTE NOT DETECTED AT OR EXCEEDING THE PRACTICAL QUANTITATION LIMIT LISTED



SCALE IN FEET

Oregon Portland | Bend | Baker City

California Oakland | Folsom | Irvine

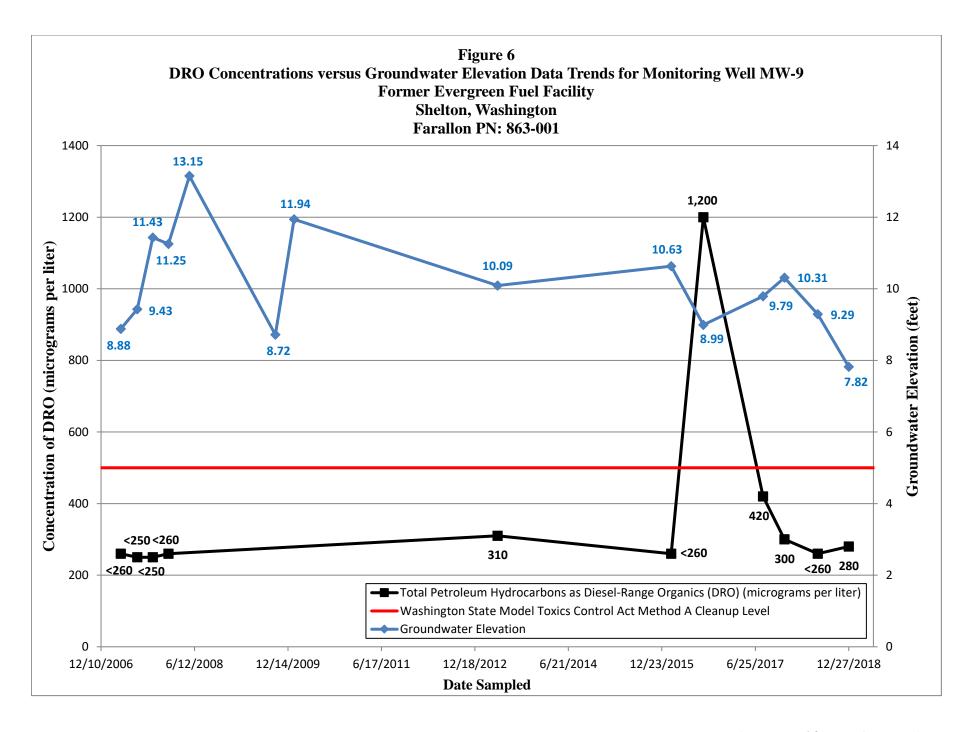
Quality Service for Environmental Solutions | farallonconsulting.com

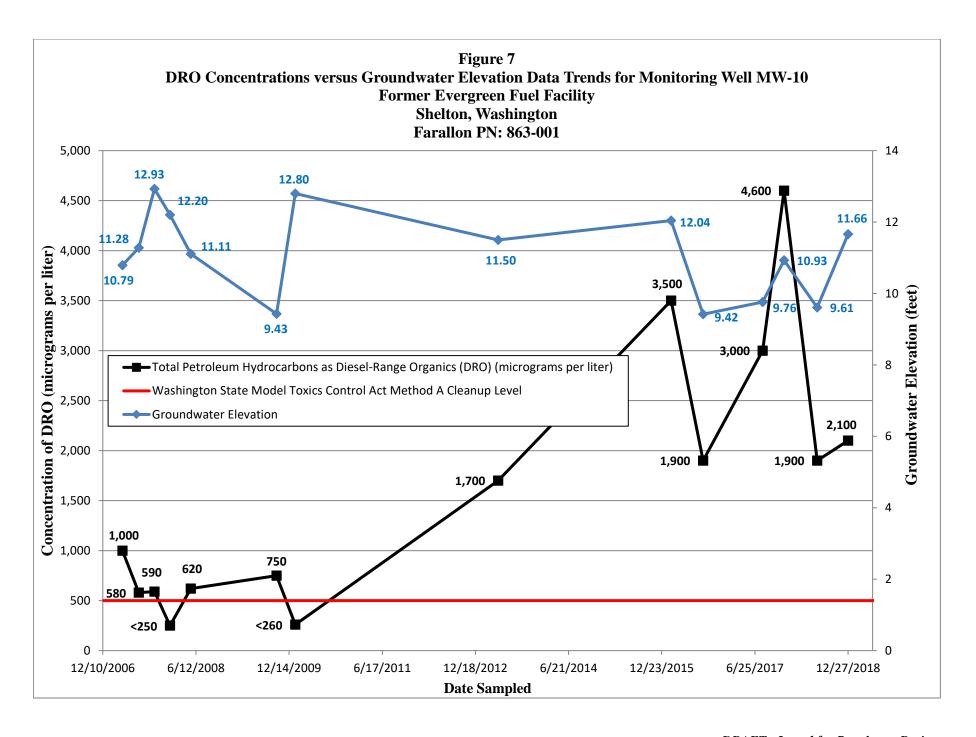
GROUNDWATER ANALYTICAL DATA FORMER EVERGREEN FUEL FACILITY 661 EAST PINE STREET SHELTON, WASHINGTON

FARALLON PN: 863-001

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Date: 1/24/2019





TABLES

CONFIRMATIONAL GROUNDWATER MONITORING AND SAMPLING
STATUS REPORT – 2018
Former Evergreen Fuel Facility
661 East Pine Street
Shelton, Washington

Farallon PN: 863-001

Table 1 Summary of Groundwater Elevation Data Former Evergreen Fuel Facility Shelton, Washington

Farallon PN: 863-001

Well Identification	Well Screened Interval (feet bgs) ¹	Top of Monument Elevation ²	Top of Casing Elevation ²	Date Measured	Depth to Water (feet) 3	Groundwater Elevation ²										
Tuentineution	(rece ugs)	Elevation .	Lievation	4/5/2007	8.13	8.33										
				7/11/2007	7.4	9.06										
				10/11/2007	6.57	9.89										
				1/11/2008	7.19	9.27										
				5/13/2008	NM	NA										
		1604	16.46	10/1/2009	NM	NA										
MW-5	5-15	16.94	16.46	1/19/2010	NM	NA										
				5/1/2013	NM	NA										
				2/16/2016	NM	NA										
				8/23/2016	NM	NA										
				8/10/2017	7.81	8.65										
				Decomn	nissioned 12/	14/2017										
				4/5/2007	6.24	8.23										
				7/11/2007	5.29	9.18										
				10/11/2007	4.4	10.07										
		3-12 14.93	14.47	1/11/2008	5.1	9.37										
				5/13/2008	NM	NA										
MW-6	2 12			10/1/2009	NM	NA										
IVI W -0	3-12	14.93	14.4/	1/19/2010	NM	NA										
															5/1/2013	NM
				2/16/2016	NM	NA										
			8/23/2016 NM													
				8/10/2017	6.43	8.04										
					nissioned 12/	14/2017										
				4/5/2007	6.1	12.38										
				7/11/2007	5.18	13.3										
				10/11/2007	4.86	13.62										
				1/11/2008	5.08	13.4										
				5/13/2008	9.27	9.21										
				10/1/2009	6.62	11.86										
MW-8	3-15	18.85	18.48	1/19/2010	4.60	13.88										
1V1 VV -0	3-13	16.65	10.40	5/1/2013	5.35	13.13										
				2/16/2016	4.75	13.73										
				8/23/2016	5.84	12.64										
				8/10/2017	5.57	12.91										
				12/14/2017	5.22	13.26										
				6/28/2018	5.42	13.06										
				12/27/2018	4.91	13.57										

Table 1 Summary of Groundwater Elevation Data Former Evergreen Fuel Facility

Shelton, Washington Farallon PN: 863-001

Well	Well Screened Interval	Top of Monument	Top of Casing	Date	Depth to Water	Groundwater		
Identification	(feet bgs) 1	Elevation ²	Elevation ²	Measured	(feet) ³	Elevation ²		
	, ,			4/5/2007	10.05	8.88		
				7/11/2007	9.50	9.43		
				10/11/2007	7.50	11.43		
				1/11/2008	7.68	11.25		
				5/13/2008	5.78	13.15		
				10/1/2009	10.21	8.72		
MW-9	3-15	19.25	18.93	1/19/2010	6.99	11.94		
IVI VV -9	3-13	19.23	16.93	5/1/2013	8.84	10.09		
			2/16/2016	8.3	10.63			
			8/23/2016	9.94	8.99			
			8/10/2017 9.14					
				12/14/2017	8.62	10.31		
				6/28/2018	9.29	9.64		
				12/27/2018	7.82	11.11		
				4/5/2007	9.14	10.79		
				7/11/2007	8.65	11.28		
				10/11/2007	7.00	12.93		
				1/11/2008	7.73	12.20		
				5/13/2008	8.82	11.11		
				10/1/2009	10.5	9.43		
MW-10	2-17	20.26	19.93	1/19/2010	7.13	12.80		
1V1 VV -1 U	2-1/	20.20	19.93	5/1/2013	8.43	11.50		
				2/16/2016	7.89	12.04		
				8/23/2016	10.51	9.42		
				8/10/2017	10.17	9.76		
				12/14/2017	9.00	10.93		
				6/28/2018	10.32	9.61		
				12/27/2018	8.27	11.66		

NOTES:

NM = not measured NA = not available

¹Screened interval in feet below ground surface (bgs).

²Elevations relative to vertical survey datum that is based on a mean lower low water (MLLW) elevation of 44.11 feet and referenced from a Washington State Department of Transportation brass cap set in monument with a published elevation of 47.58 feet NAV.

³Depth to water measured in feet below the top of the well casing.

Table 2 Summary of Groundwater Analytical Results Former Evergreen Fuel Facility

Shelton, Washington Farallon PN: 863-001

Sample	Campla				Analytical R	Results (micros	grams per liter	<u></u>	
Sample Identification	Sample Location	Sample Date	GRO ¹	DRO ²	ORO ²	Benzene ³	Toluene ³	Ethylbenzene ³	Xylenes ³
MW5-040507	Location	4/5/2007	<100	<270	<430	<1.0	<1.0	<1.0	<1.0
MW5-071107		7/11/2007	<100	<250	<400	<1.0	<1.0	<1.0	<1.0
MW5-101107		10/11/2007	<100	<250	<400	<1.0	<1.0	<1.0	<1.0
MW5-011108		1/11/2008	<100	<250	<400	<1.0	<1.0	<1.0	<1.0
NS		5/13/2008						-	
NS		10/1/2009							
NS	MW-5	1/19/2010							
NS		5/1/2013							
NS		2/16/2016							
NS		8/23/2016							
NS		8/10/2017							
NS		12/14/2017				commissioned			
MW6-040507		4/5/2007	<100	<260	<410	<1.0	<1.0	<1.0	<1.0
MW6-071107		7/11/2007	<100	<250	<400	<1.0	<1.0	<1.0	<1.0
MW6-101107		10/11/2007	<400	<250	<400	<4.0	<4.0	<4.0	<4.0
MW6-011108		1/11/2008	<100	<250	<410	<1.0	<1.0	<1.0	<1.0
NS		5/13/2008							
NS		10/1/2009							
NS	MW-6	1/19/2010							
NS		5/1/2013							
NS		2/16/2016							
NS		8/23/2016							
NS NS		8/10/2017							
NS		12/14/2017				commissioned			
MW8-040507		4/5/2007	190 ⁴	<250	<410	1.4	<1.0	<1.0	4.0
MW8-071107		7/11/2007	<100	<250	<400	2.6	<1.0	<1.0	<1.0
MW8-101107		10/11/2007	<100	<250	<400	5.7	<1.0	<1.0	<1.0
MW8-011108		1/11/2007	<100	<270	<440	<1.0	<1.0	<1.0	<1.0
MW8-051308		5/13/2008	<100	<270	<430	2.7	<1.0	<1.0	<1.0
MW8-100109		10/1/2009		<250	<400	1.4			
MW8-011910		1/19/2010		<260	<410	<1.0			
MW-8-050113	MW-8	5/1/2013	<100	<250	<410	<1.0	<1.0	<1.0	<2.0
MW-8-021616		2/16/2016		<260	<410				
MW-8-082316		8/23/2016	 	280	<410				
MW-8-081017		8/10/2017		<260	<410				
MW-8-121417		12/14/2017		<270	<440				
MW-8-062818		6/28/2018		<260	<410				
MW-8-122718		12/27/2018	<u></u>	<260	<410				
MW9-040507		4/5/2007	<100	<260	<410	<1.0	<1.0	<1.0	<1.0
MW9-040307 MW9-071107			<100		<400			1	<1.0
MW9-071107 MW9-101107		7/11/2007 10/11/2007	<100	<250 <250	<410	<1.0 <1.0	<1.0 <1.0	<1.0 <1.0	<1.0
MW9-011108		1/11/2007	<100	<260	<410	<1.0	<1.0	<1.0	<1.0
MW-9-050113		5/1/2013	<100	310	<400	<1.0	<1.0	<1.0	<2.0
MW-9-030113 MW-9-021616	MW-9	2/16/2016		<260	<410				
	1V1 VV =7								
MW-9-082316		8/23/2016		1,200	<550 U1				
MW-9-081017		8/10/2017		420	<410				
MW-9-121417		12/14/2017		<300	<480				
MW-9-062818		6/28/2018		<260	<410				
MW-9-122718		12/27/2018		280	<410				

Table 2

Summary of Groundwater Analytical Results

Former Evergreen Fuel Facility

Shelton, Washington Farallon PN: 863-001

Sample	Sample				Analytical R	Results (microg	rams per liter)	
Identification	Location	Sample Date	GRO ¹	DRO ²	ORO ²	Benzene ³	Toluene ³	Ethylbenzene ³	Xylenes ³
MW10-040507		4/5/2007	<400	1,000	<420	<4.0	<4.0	<4.0	<4.0
MW10-071107		7/11/2007	<100	580	<400	<1.0	<1.0	<1.0	<1.0
MW10-101107		10/11/2007	<400	590	<400	<4.0	<4.0	<4.0	<4.0
MW10-011108		1/11/2008	<100	<250	<410	<1.0	<1.0	<1.0	<1.0
MW10-051308		5/13/2008	220	620	<430	<1.0	<1.0	<1.0	<1.0
MW10-100109		10/1/2009		750	<410	<1.0			
MW10-011910	MW-10	1/19/2010		<260	<410	<1.0			
MW-10-050113	IVI W - 10	5/1/2013	<100	1,700	<410	<1.0	<1.0	<1.0	<2.0
MW-10-021616		2/16/2016		3,500	<410				
MW-10-021616		8/23/2016		1,900	<640 U1				
MW-10-081017		8/10/2017		3,000	<580 U1				
MW-10-121417		12/14/2017		4,600	<3,400 U1				
MW-10-062818		6/28/2018		1,900	<520 U1				
MW-10-122718		12/27/2018		2,100	<1,400 U1				
MTCA Method A Cleanup Levels ⁵		800/1,000 6	500	500	5	1,000	700	1,000	

NOTES:

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

DRO = total petroleum hydrocarbons as diesel-range organics

 $GRO = total\ petroleum\ hydrocarbons\ as\ gasoline-range\ organics$

NS = not sampled

ORO = total petroleum hydrocarbons as oil-range organics

QA/QC = quality assurance/quality control

U1 = the practical quantitaion limit is elevated due to interferences present in the sample

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

⁻⁻ denotes sample not analyzed.

¹Analyzed by Northwest Method NWTPH-Gx.

²Analyzed by Northwest Method NWTPH-Dx.

³Analyzed by U.S. Environmental Protection Agency (EPA) Method 8260B.

⁴Laboratory analytical report indicates gasoline results are being influenced by the presence of steel.

⁵Washington 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 2013.

⁶The cleanup level for GRO is without/with the presence of benzene.

Table 3 Summary of Groundwater Geochemical Parameters Former Evergreen Fuel Facility Shelton, Washington

Farallon PN: 863-001

		Geochemical Results									
Well Identification	Sample Date	Temperature (°C)	Specific Conductance (mS/cm)	pH (pH units)	Dissolved Oxygen (mg/l)	Oxidation- Reduction Potential (mV)					
	4/5/2007	12.4	0.131	6.12	0.65	471.1					
	7/11/2007	19.65	0.147	4.77	1.03	413.2					
	10/11/2007	14.96	0.143	6.74	0.91	-10.4					
	1/11/2008	11.97	0.177	6.30	0.47	99.9					
	5/13/2008	NS	NS	NS	NS	NS					
MW-5	10/1/2009	NS	NS	NS	NS	NS					
	1/19/2010	NS	NS	NS	NS	NS					
	2/16/2016	NS	NS	NS	NS	NS					
	8/23/2016	NS	NS	NS	NS	NS					
	8/10/2017	NS	NS	NS	NS	NS					
	12/14/2017		Well I	Decommissioned	12/14/2017						
	4/5/2007	11.3	0.393	6.00	0.49	428.2					
	7/11/2007	19.25	0.421	4.33	0.94	381.8					
	10/11/2007	13.75	0.322	6.77	0.78	-82.8					
	1/11/2008	9.6	0.32	6.70	0.74	-35.5					
MW-6	5/13/2008	NS	NS	NS	NS	NS					
MW-6	10/1/2009	NS	NS	NS	NS	NS					
	1/19/2010	NS	NS	NS	NS	NS					
	2/16/2016	NS	NS	NS	NS	NS					
	8/23/2016	NS	NS	NS	NS	NS					
	8/10/2017	NS	NS	NS	NS	NS					
	12/14/2017		Well I	Decommissioned	12/14/2017						
	4/5/2007	11.43	0.270	6.70	1.29	443.6					
	7/11/2007	21.54	0.386	4.12	0.93	511.9					
	10/11/2007	14.59	0.323	7.17	1.62	68.2					
	1/11/2008	8.38	0.252	7.37	2.48	-30.4					
	5/13/2008	12.1	0.346	7.05	0.98	-44.4					
	10/1/2009	17.53	0.468	7.21	4.22	-76					
MW-8	1/19/2010	9.66	0.12	6.97	6.7	49.7					
141 44 -0	5/1/2013	14.83	0.204	6.22	2.06	-7					
	2/16/2016	10.62	0.092	6.64	4.37	147					
[8/23/2016	21.60	0.235	6.72	0.61	-26					
	8/10/2017	21.4	0.180	6.71	0.43	-31.5					
	12/14/2017	11.0	0.190	6.64	0.71	9.1					
	6/28/2018	17.7	0.224	6.46	1.03	-1.9					
	12/27/2018	9.6	0.12	7.2	4.75	120.7					

Table 3 Summary of Groundwater Geochemical Parameters Former Evergreen Fuel Facility Shelton, Washington

Farallon PN: 863-001

				Geochemical Ro	esults	
Well		Temperature	Specific Conductance	pН	Dissolved	Oxidation- Reduction
Identification	Sample Date	(°C)	(mS/cm)	(pH units)	Oxygen (mg/l)	Potential (mV)
	4/5/2007	12.44	0.361	6.12	3.57	478.6
	7/11/2007	21.25	0.56	4.64	3.41	420
	10/11/2007	15.11	0.326	6.57	6.4	79.8
	1/11/2008	8.66	0.129	7.25	1.92	69.5
	5/13/2008	NS	NS	NS	NS	NS
	10/1/2009	NS	NS	NS	NS	NS
MW-9	1/19/2010	NS	NS	NS	NS	NS
1V1 VV - 9	5/1/2013	16.20	0.135	6.25	0.89	-25
	2/16/2016	10.61	0.150	6.59	2.23	85
	8/23/2016	21.80	0.860	6.78	0.54	-40
	8/10/2017	19.4	0.248	6.61	0.41	-44.9
	12/14/2017	11.8	0.194	6.74	0.51	-47.3
	6/28/2018	16.2	0.331	6.63	1.14	-10.4
	12/27/2018	10.4	0.188	6.91	4.09	132.9
	4/5/2007	11.84	0.252	5.87	0.96	480.3
	7/11/2007	20.54	0.316	5.77	0.73	175
	10/11/2007	15.07	0.309	6.56	0.48	-12.7
	1/11/2008	9.4	0.141	6.66	6.13	109.8
	5/13/2008	12.21	0.209	6.72	1.28	-57.8
	10/1/2009	17.16	0.379	6.80	0.07	-91.8
MW-10	1/19/2010	10.65	0.108	6.72	1.95	23.2
1V1 VV -1O	5/1/2013	13.99	0.133	5.99	1.00	-16
	2/16/2016	11.33	0.274	6.24	0.88	44
-	8/23/2016	18.31	0.343	6.69	0.79	-70
	8/10/2017	18.0	0.201	6.70	0.28	-96.5
	12/14/2017	12.1	0.269	6.26	0.29	-108.9
	6/28/2018	15.5	0.277	6.70	0.9	-77.5
NOTEC.	12/27/2018	11.6	0.427	6.17	2.32	167.6

NOTES:

°C = degrees Celsius

mS/cm = millisemens per centimeter

mg/l = milligrams per liter

mV = millivolts

NS = not sampled

ATTACHMENT A LABORATORY ANALYTICAL REPORTS

CONFIRMATIONAL GROUNDWATER MONITORING AND SAMPLING
STATUS REPORT – 2018
Former Evergreen Fuel Facility
661 East Pine Street
Shelton, Washington

Farallon PN: 863-001



July 5, 2018

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

Re: Analytical Data for Project 863-001

Laboratory Reference No. 1806-303

Dear Javan:

Enclosed are the analytical results and associated quality control data for samples submitted on June 29, 2018.

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,

David Baumeister Project Manager

Enclosures

Date of Report: July 5, 2018 Samples Submitted: June 29, 2018 Laboratory Reference: 1806-303

Project: 863-001

Case Narrative

Samples were collected on June 28, 2018 and received by the laboratory on June 29, 2018. 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 5, 2018 Samples Submitted: June 29, 2018 Laboratory Reference: 1806-303 Project: 863-001

NWTPH-Dx

Matrix: Water Units: mg/L (ppm)

				Date	Date	
Analyte	Result	PQL	Method	Prepared	Analyzed	Flags
Client ID:	MW-8-062818					
Laboratory ID:	06-303-01					
Diesel Range Organics	ND	0.26	NWTPH-Dx	7-2-18	7-2-18	
Lube Oil Range Organics	ND	0.41	NWTPH-Dx	7-2-18	7-2-18	
Surrogate:	Percent Recovery	Control Limits				
o-Terphenyl	99	50-150				
Client ID:	MW-9-062818					
Laboratory ID:	06-303-02					
Diesel Range Organics	ND	0.26	NWTPH-Dx	7-2-18	7-2-18	
Lube Oil Range Organics	ND	0.41	NWTPH-Dx	7-2-18	7-2-18	
Surrogate:	Percent Recovery	Control Limits				
o-Terphenyl	105	50-150				
Client ID:	MW-10-062818					
Laboratory ID:	06-303-03					
Diesel Range Organics	1.9	0.26	NWTPH-Dx	7-2-18	7-2-18	
Lube Oil Range Organics	ND	0.52	NWTPH-Dx	7-2-18	7-2-18	U1
Surrogate:	Percent Recovery	Control Limits				
o-Terphenyl	106	50-150				

Date of Report: July 5, 2018 Samples Submitted: June 29, 2018 Laboratory Reference: 1806-303

Project: 863-001

NWTPH-Dx QUALITY CONTROL

Matrix: Water Units: mg/L (ppm)

				Date	Date	
Analyte	Result	PQL	Method	Prepared	Analyzed	Flags
METHOD BLANK						
Laboratory ID:	MB0702W1					
Diesel Range Organics	ND	0.25	NWTPH-Dx	7-2-18	7-2-18	
Lube Oil Range Organics	ND	0.40	NWTPH-Dx	7-2-18	7-2-18	
Surrogate:	Percent Recovery	Control Limits				
o-Terphenyl	87	50-150				

Analyte	nalyte Result		Spike	Level	Source Result	Percent Recovery	Recovery Limits	RPD	RPD Limit	Flags
DUPLICATE										
Laboratory ID:	06-30	03-01								
'	ORIG	DUP								
Diesel Range	ND	ND	NA	NA		NA	NA	NA	NA	
Lube Oil Range	ND	ND	NA	NA		NA	NA	NA	NA	
Surrogate:		•			•		_	•		•
o-Ternhanyl						00 103	50-150			

o-Terphenyl 50-150 99 103



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.

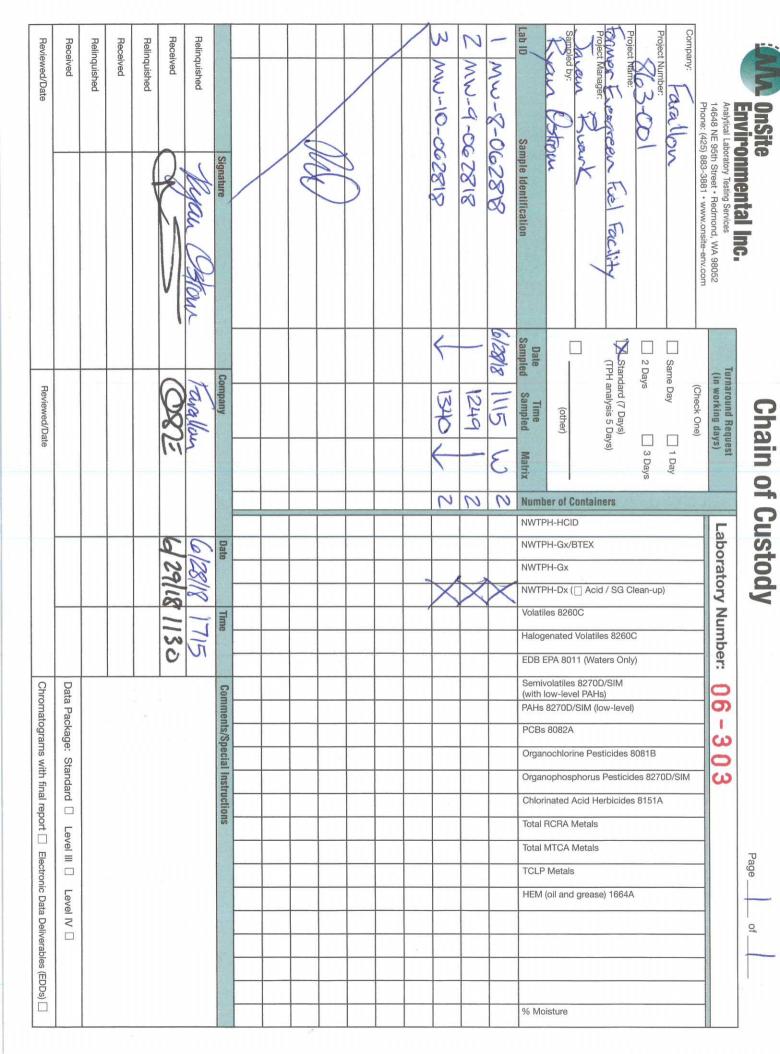
7 -

ND - Not Detected at PQL

PQL - Practical Quantitation Limit

RPD - Relative Percent Difference







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

January 2, 2019

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

Re: Analytical Data for Project 863-001 Laboratory Reference No. 1812-261

Dear Javan:

Enclosed are the analytical results and associated quality control data for samples submitted on December 28, 2018.

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,

David Baumeister Project Manager

Enclosures

Date of Report: January 2, 2019 Samples Submitted: December 28, 2018

Laboratory Reference: 1812-261

Project: 863-001

Case Narrative

Samples were collected on December 27, 2018 and received by the laboratory on December 28, 2018. 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: January 2, 2019 Samples Submitted: December 28, 2018

Laboratory Reference: 1812-261

Project: 863-001

DIESEL AND HEAVY OIL RANGE ORGANICS NWTPH-Dx

Matrix: Water
Units: mg/L (ppm)

				Date	Date	
Analyte	Result	PQL	Method	Prepared	Analyzed	Flags
Client ID:	MW-8-122718					
Laboratory ID:	12-261-01					
Diesel Range Organics	ND	0.26	NWTPH-Dx	12-31-18	12-31-18	
Lube Oil Range Organics	ND	0.41	NWTPH-Dx	12-31-18	12-31-18	
Surrogate:	Percent Recovery	Control Limits				
o-Terphenyl	106	50-150				
Client ID:	MW-9-122718					
Laboratory ID:	12-261-02					
Diesel Range Organics	0.28	0.26	NWTPH-Dx	12-31-18	12-31-18	
Lube Oil Range Organics	ND	0.42	NWTPH-Dx	12-31-18	12-31-18	
Surrogate:	Percent Recovery	Control Limits				
o-Terphenyl	85	50-150				
Client ID:	MW-10-122718					
Laboratory ID:	12-261-03					
		0.26	NWTPH-Dx	10 21 10	12-31-18	
Diesel Range Organics	2.5	0.26		12-31-18		114
Lube Oil Range Organics	ND	1.4	NWTPH-Dx	12-31-18	12-31-18	U1
Surrogate:	Percent Recovery	Control Limits				
o-Terphenyl	82	50-150				

Date of Report: January 2, 2019 Samples Submitted: December 28, 2018

Laboratory Reference: 1812-261

Project: 863-001

DIESEL AND HEAVY OIL RANGE ORGANICS NWTPH-Dx QUALITY CONTROL

Matrix: Water Units: mg/L (ppm)

				Date	Date	
Analyte	Result	PQL	Method	Prepared	Analyzed	Flags
METHOD BLANK						
Laboratory ID:	MB1231W1					
Diesel Range Organics	ND	0.25	NWTPH-Dx	12-31-18	12-31-18	
Lube Oil Range Organics	ND	0.40	NWTPH-Dx	12-31-18	12-31-18	
Surrogate:	Percent Recovery	Control Limits				_
o-Terphenyl	95	50-150				

					Source	Percent	Recovery		RPD	
Analyte	Res	sult	Spike	Level	Result	Recovery	Limits	RPD	Limit	Flags
DUPLICATE										
Laboratory ID:	12-25	58-04								
	ORIG	DUP								
Diesel Range	ND	ND	NA	NA		NA	NA	NA	NA	
Lube Oil Range	ND	ND	NA	NA		NA	NA	NA	NA	
Surrogate:										
o-Terphenyl						105 108	50-150			



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.

7 -

ND - Not Detected at PQL

PQL - Practical Quantitation Limit

RPD - Relative Percent Difference



Reviewed/Date	Received	Relinquished	Received	Relinquished	Received	Relinquished Hyang History	Signature					3 MW-10-12278	2 MW-9-122718	1 MW-8-122718	50	Sampled by:	7	Bones Euroseen Freling Facility	863-00	Froject Number:	Phone: (425) 883-3881 • www.onsite-env.com Company:	Analytical Laboratory Testing Services 14648 NE 95th Street • Redmond, WA 98052	OnSite Environmental Inc.				
Reviewed/Date					J CORNet	Ferallon	Company	/	/			→ httl →	1406	_	Date Time Sampled Sampled Matrix	(other)		Standard (7 Days)	2 Days 3 Days	Same Day 1 Day	(Check One)	Turnaround Request (in working days)	Chain of Custody				
					12/28/18/12/20	12128/18 0930	Date Time					2	×	Z X	NWTF NWTF NWTF Volatil	H-Dx (es 8260 enated	BTEX Acid	/ SG C	0	D)		Laboratory Number:					
Chromatograms with final report Electronic Data Deliverables (EDDs)	Data Package: Standard ☐ Level III ☐ Level IV ☐						Comments/Special Instructions								Semiv (with I PAHs PCBs Organ Organ Chlori Total I	olatiles ow-leve 8270D/ 8082A ochlori ophosp nated A RCRA M MTCA M Metals	8270E el PAHs SIM (lo SIM (lo		8081B les 827		1	r: 12-261	Page of				

Chain of Custody