December 23, 2019

Washington State Department of Ecology
Northwest Regional Office
Toxics Clean Program
3190 160th Avenue SE
Bellevue, Washington 98008-5452

Attention: Sonia Fernandez – VCP Coordinator

Re: Cleanup Status Report for the Following Site:
Site Name: Acrowood Corporation
Site Address: 4425 S 3rd Avenue, Everett, Washington 98203
Facility/Site No.: 22755667
VCP Project No.: NW2151
Cleanup Site ID No.: 4703

Dear Ms. Fernandez,

This Cleanup Status Report has been developed in response to the October 14, 2019 "*Request for Information of Status of VCP* [Voluntary Cleanup Program] *Project"* Letter received by Acrowood from the Department of Ecology (Ecology) requesting a "*Cleanup Status Report"* for the Property known as Acrowood Corp, located at 4425 South 3rd Avenue, in Everett, Washington (Site/Subject Site/Property/Subject Property). This report includes a detailed site history, the cleanup status of each area of the Site, and a summary of the next steps ECI plans to take with Acrowood toward the cleanup of the Site.

1.0 SITE HISTORY

According to documents reviewed by ECI, several previous investigations have been performed at the Site by Adapt Engineering, Inc (Adapt) beginning in 1999. This section details each investigation which ECI had access to by the date of this letter. Several documents which were referenced in the below-mentioned reports were not accessible to ECI at the time of this Cleanup Status Report. ECI has submitted a public records request to Ecology to obtain these records but has not received them as of the date of this report. These records include:

- *"Opinion Letter on Further Action at Acrowood Corporation Facility, 4425 South 3rd Avenue, Everett, Washington"*, Washington State Department of Ecology. April 18, 2007
- *"Groundwater Monitoring Reports"* (four reports), Quarter 3, 2007 through Quarter 3, 2008, Adapt Engineering Inc., August 2007 through August 2008
- *"Phase II Environmental Site Assessment, Acrowood Corporation Facility, 4425 South 3rd Avenue, Everett, Washington*", prepared by Adapt Engineering Inc., February 6, 2011

- *"Letter from Brad Gilmore, Washington State Department of Ecology. Re: Opinion Letter on further action at Acrowood Corporation Facility, 4425 South 3rd Avenue, Everett, Washington*". June 10, 2011

Additional reports or environmental investigations not referenced within the text of this report have not been disclosed to ECI.

During the course of the investigations, three areas were identified as containing concentrations of target analytes in soil and/or ground water at concentrations above Model Toxics Control Act (MTCA) Method A or B Cleanup Levels (Figure 3 and Figure 4, Appendix A). These areas are described as:

- Area 1 - A paint and solvent storage shed where trichloroethene (TCE) was encountered in soil and groundwater at concentrations exceeding applicable MTCA Method A Soil and Groundwater Cleanup Levels.
- Area 2 - A former heating oil UST location where oil-range organics (ORO) were encountered in soil at concentrations below the MTCA Method A Soil Cleanup Level.
- Area 3 - An area where a release from a former fuel tank occurred and concentrations of diesel-range organics (DRO), oil-range organics (ORO), and polycyclic aromatic hydrocarbons (PAHs) in soil and groundwater exceeded MTCA Method A Soil and Groundwater Cleanup Levels.

In an "*Opinion Letter*" dated June 22, 2010 Ecology indicated that:

> *"Ecology does agree that groundwater monitoring in the area of the former paint and solvent storage shed [Area 1] indicates that there is no longer a TCE impact."*

This opinion letter also indicated that:

> *"Groundwater characterization has not been completed for the area around the former heating oil UST [Area 2] located by the shipping and receiving dock."*

Groundwater characterization in Area 2 was later completed in 2011 by ECI.

Because of the opinions provided by Ecology in their 2010 opinion letter, and the completion of the groundwater characterization in 2011 by ECI, further investigations into Area 1 and Area 2 have not been performed after a "*Focused Subsurface Investigation*" conducted by ECI in 2011 and submitted to Ecology in a report dated September 30, 2011.

In Area 3, contamination of DRO, ORO, and PAHs in soil and groundwater remains in place along the southeast corner of the steel shop building at the Site. Adapt proposed closing this area and obtaining a "*No Further Action Determination*" (NFA) with an Environmental Covenant in a January 18, 2002 "*Closure Report*". Ecology denied the NFA in their April 2007 "*Opinion Letter*" due to a lack of sufficient downgradient groundwater-monitoring wells according to subsequent reports produced by Adapt. Since issuance of the 2007 *Further Action Letter*, five additional wells have been installed by ECI, one in 2011 and four in 2019.

A "*Monitoring Well Installation & Groundwater Sampling Report*" was produced by ECI following a groundwater monitoring event in Area 3 in November 2019 which is being submitted along with this Cleanup Status Report.

Below is a summary of the Site history based on the reports that ECI has reviewed.

1.1 Adapt Engineering, Inc, November 1999, Preliminary Phase II Environmental Site Assessment

In 1999, ADAPT conducted a Preliminary Phase II Environmental Site Assessment (ESA) to evaluate possible impacts from recognized environmental conditions identified in a Phase I ESA dated August 20, 1999. The Phase I ESA identified five potential recognized environmental concerns at the Subject Property that included a former heating oil underground storage tank, an area where a former fuel oil tank was located, a paint storage building, waste iron and slag infilling, and a storm water discharge pipe.

The Preliminary Phase II ESA consisted of advancing 10 Geoprobe borings to depths of between 8 and 22 feet in the four abovementioned areas of concern. Representative soil and groundwater samples were collected for analytical testing. The field and analytical data suggested that three of the four areas of concern exhibited petroleum hydrocarbon or halogenated volatile organic compounds in soil or groundwater above MTCA Method A Cleanup Levels. The following recognized environmental concerns were assessed during the Preliminary Phase II ESA:

- Paint Storage Building: This area is referred to by Ecology as Area 1 in subsequent reports. Based on waste notification documents and discussions with Acrowood personnel, chlorinated and other solvents including trichloroethylene (TCE), 1,1,1-Trichloroethane (TCA), Methyl Ethyl Ketone (MEK), and mineral spirits were used prior to 1995 to clean parts, and as paint thinners in the paint area. These chemicals were reportedly stored a "Paint/Solvent Storage Building" located at the southern end of the facility main building. Analytical results from borings placed in and around the "Paint/Solvent Storage Building" indicated that there had been a release of chlorinated solvents to soil and groundwater beneath the building. Soil samples from boring P7 exhibited 0.055 milligrams per kilogram (mg/kg) of trichloroethene and boring P6 exhibited 8.38 micrograms per liter (µg/L) of trichloroethene in groundwater samples. Samples obtained from Boring P5 did not exhibit detectable concentrations of chlorinated solvents. (Figures 3, and 4, Appendix A) (Table 1 and 2, Appendix B)

- Former UST (heating oil tank): This area is referred to by Ecology as Area 2 in subsequent reports. Anecdotal information indicated that a former gasoline underground storage tank (UST) was located between the "Maintenance Shop" and the "Storeroom" east of the "Machine Shop". The UST was reportedly removed in the late 1970s. No information was available on the UST removal.

  Analytical results from three borings placed in and around the former UST indicated that there has been a diesel release beneath the location of the former UST. Boring P8 (Figure 3, Appendix A) exhibited faint hydrocarbon odors and chemical analysis revealed 983 mg/kg of diesel and 1,920 mg/kg of heavy oil hydrocarbons in the soil.

  In order to characterize the extent of release two additional borings were placed approximately at a radial distance of 8 and 15 feet to the west and south of P8 in the vicinity of the former UST. Analytical results appeared to limit the lateral extent of petroleum hydrocarbon migration to an area within approximately 8 to 10 feet of boring P8 and a vertical extent of approximately 6 to 9 below ground surface (bgs). (Figure 3, Appendix A) (Table 3, Appendix B)

- Former Fuel Oil Tanks: This area is referred to as Area 3 by Ecology in subsequent reports. The 1960 Sanborn Map, reviewed by ADAPT, reportedly depicts suspect fuel oil tanks located adjacent to the "Steel Shop" on the eastern edge of the site (Figures 3 and 4, Appendix A). According to Acrowood personnel, the tanks were removed prior to the 1970s when Acrowood purchased the

site. Additional information was not available regarding the nature of these suspected tanks. According to Adapt, based on the location and current limited access to the area, it is likely that the fuel oil tanks were aboveground tanks.

Analytical results from borings placed in and around the suspected fuel oil tanks area indicated that there had been a release of petroleum hydrocarbons. One boring (P1) (Figures 3 and 4 Appendix A) placed within the estimated footprint of the fuel tanks, exhibited heavy staining and residual free-product adhering to the soil particles from approximately 5 to 15 feet bgs.

Analytical results from a soil sample collected at a depth of 16 feet bgs exhibited concentrations of diesel and heavy oil at 10,000 mg/kg and 4,010 mg/kg, respectively. Two additional borings (P3 and P2) were placed at a radial distance of approximately 12 and 20 feet from boring P1, respectively, to the west and south, to delineate the lateral migration of the petroleum hydrocarbon. Diesel and heavy oil hydrocarbons were exhibited in soil at a depth of approximately 12 feet bgs in boring P3, at 134 mg/kg for diesel and 210 mg/kg for heavy oil, but not in were not present in the sample from boring P2. Analytical results appeared to limit the lateral extent of the release to an area within approximately 10 to 12 feet of boring P1. Vertical soil sampling results appeared to delineate the vertical extent to between approximately 4.5 feet and 20 feet bgs. (Table 5 and 6, Appendix B)

- Stormwater drain discharge pipe: According to Adapt, there was a low potential for impact to the subsurface soils from petroleum hydrocarbon, on-site chemical usage, and releases to the ground surface which may have been washed into the storm drain system during periods of precipitation. Adapt indicated that the stormwater drains pass through the main building and discharge at the eastern edge of the site and have the potential to collect spills and releases from inside the building.

  Metal shavings and stained soil observed at the discharge pipe appeared to indicate that petroleum hydrocarbons may have impacted the soil beneath the discharge pipe. Analytical results and field observations did not indicate that petroleum hydrocarbons, chlorinated solvents, or lead, arsenic, cadmium, or chromium were present above the MTCA Method A Cleanup Levels in the subsurface soils sampled and tested beneath the stormwater outfall area.

- Waste Iron and Slag Fill Material: Field observations made by Adapt along the eastern edge of the site suggested that waste iron and slag from the former iron foundry was apparently disposed of on the south and east side of the Property. It was assumed there was a potential for environmental impacts in this area due to the presence of metals and waste casting materials.

  The analytical results from samples obtained from the soil borings and field observations by Adapt did not indicate that the fill soils and iron slag were impacting the underlying native soils with lead, arsenic, cadmium, or chromium. Groundwater was not encountered during the Adapt Geoprobe® borings to depths of 16 feet bgs.

1.2 Adapt Engineering, Inc, May 2000 - Supplemental Phase II Environmental Site Assessment

Based on the results of the Preliminary Phase II ESA, three of the five areas of concern located on the Property identified in the Phase I exhibited petroleum or halogenated hydrocarbon impacts to soil and/or

groundwater. These areas included the former UST area, the suspected fuel tank area, and the paint storage building. A Supplemental Phase II was performed by Adapt to further delineate the extent of soil and groundwater impacts in these three areas.

In order to further delineate the extent of petroleum hydrocarbon and TCE impacts identified in the Preliminary Phase II ESA at the three areas of concern additional Geoprobe® borings were advanced. In addition, in order to evaluate possible source areas for the TCE a soil vapor and shallow soil sampling survey was conducted in and adjacent to the paint storage building.

- Paint Storage Building (Area 1): A preliminary soil vapor and soil sampling survey was conducted beneath the "Paint/solvent Storage Building". Four soil vapor and soil samples were collected from approximately 2.5 feet below the top of the concrete floor slab of the building. Two additional Geoprobe® borings were placed in the assumed downgradient and cross-gradient location relative to the building.

  Analytical results from the soil vapor survey and Geoprobe® borings, placed in and around the Paint/Solvent Storage Building, indicated that there had been a minor release of chlorinated solvents (trichloroethene) to soil and groundwater. The assessment and subsurface characterization work appeared to indicate that the vertical and horizontal extent of the impact was limited to the vicinity of the building and did not appear to migrate off-Site.

- Former UST (Area 2): One additional Geoprobe® boring was placed on the eastern side (assumed downgradient direction) of the former UST pit to evaluate the eastern extent of the soil impacts and document whether the groundwater had been impacted by diesel-range and heavy oil-range petroleum hydrocarbons downgradient of the former UST.

  Analytical results from borings placed in and around the former UST indicated that there had been a petroleum release beneath the location of the former UST. Samples from Boring P8 produced faint hydrocarbon odors and exhibited concentrations of 983 mg/kg of diesel-range hydrocarbons and 1,920 mg/kg of heavy oil-range hydrocarbons in the soil when analyzed.

  Three additional borings (Borings P9, P10 and P19) were located around Boring P8 in order to characterize the lateral extent of petroleum hydrocarbon migration. Analytical results appeared to limit the lateral extent to an area within approximately 8 to 10 feet of Boring P8 (Table 3, Appendix B).

  Adapt reported that groundwater analytical results appeared to indicate that groundwater had not been impacted by the petroleum release, however, the laboratory results of the groundwater samples have not been made available to ECI.

- Former Fuel Tank Area (Area 3): Analytical results from borings, placed in and around the suspected fuel tank area, indicated that there has been a release of heavy oil-range hydrocarbons and diesel-range hydrocarbons. The laboratory identified the petroleum as similar to Bunker C fuel oil. Borings P1 and P20 exhibited heavy staining and apparent residual free-product in the soil. The observed residual product appeared viscous and immobile.

  Four additional borings (Borings P2, P3, HA1 and HA2)(Figures 3 and 4, Appendix A) were placed south, west, east and northeast of Boring P1 at radial distances of approximately 20, 12, 10 and 15 feet from Boring P1, respectively. Observed concentrations of heavy oil-range hydrocarbons and diesel-range hydrocarbons were below MTCA Cleanup levels for soils of 2,000 mg/kg,.

Analytical results from soil and groundwater samples appeared to indicate that the area of petroleum hydrocarbon impact was localized to an area a radial distance of approximately 10 to 15 feet from Borings P1 and P20 to the east, west and south. The vertical extent of the release appeared to be located from approximately 8 to 15 feet bgs. Due to the presence of the "Steel Shop" building, the northern lateral extent was not delineated. It is possible residual petroleum hydrocarbons are located beneath the "Steel Shop" structure.

1.3 Adapt Engineering, Inc, August 2000 through August 2001 - Groundwater Monitoring Well Installation and Groundwater Quality Monitoring Reports

In August 2000, Adapt oversaw the installation of three groundwater-monitoring wells beneath the former fuel tank area adjacent to the south wall of the "Steel Shop" Figure 4, Appendix A). A "*Groundwater Monitoring Well Installation Report*" dated August 29, 2000 was prepared detailing the installation of the three monitoring wells and the results of the first quarterly groundwater quality sampling.

At the time of well installation, groundwater was estimated to be flowing to the east towards the Snohomish River approximately 1,000 feet east of the Site. An upgradient well was placed approximately 30 feet west of the Geoprobe® borings that were located in the former fuel tank area during the Phase II assessments and two downgradient wells were placed approximately ten feet east of a retaining wall in the fire lane easement located adjacent to the UST location to the east .

The three groundwater monitoring wells were sampled using low-flow purge and sample methods to minimize interferences caused by particulate material. Based on results from the initial (1st Quarter) sampling event, groundwater was observed to be flowing east-southeast. Analytical results indicated that heavy oil-range hydrocarbons observed were not exhibited above the standard laboratory detection limits in samples from Geoprobe® and hand-auger borings, and in the three wells that were installed.

Adapt conducted three additional quarterly sampling events in the groundwater-monitoring wells installed in the vicinity of the former fuel tanks. Based on the results of the additional quarterly sampling, diesel-range hydrocarbons, heavy oil-range hydrocarbons, or PAHs, were not detected above the standard laboratory detection limits in the upgradient or downgradient wells (Table 6, Appendix B).

1.4 Adapt Engineering, Inc, January 2002 – Acrowood Closure Report

In January 2002, Adapt prepared a closure report for Acrowood which detailed the previous environmental activities on the Property and recommended that the report be submitted to Ecology to obtain a "No Further Action" (NFA) determination. Based on the information summarized below, ADAPT believed the Subject Property qualified for an NFA. Adapt also noted that:

"…restrictive covenants as dictated by Ecology may be an appropriate condition for the NFA:

- *According to empirical data collected from four quarterly sampling events, in the area of the former fuel oil tanks (Area 3), the groundwater migrating off-site meets MTCA Method A Cleanup Levels for TPH and PAHs. Based on these results, it appears site groundwater conditions meet requirements for site closure.*
- *According to empirical data collected during the Preliminary and Supplemental Phase II ESA work in the area of the paint storage building (Area 1), concentrations of TCE in soil and groundwater are below MTCA Method B Cleanup levels.*

- *According to empirical data collected during the Preliminary and Supplemental Phase II ESA work in the area of the Former UST (Area 2), concentrations of diesel and heavy oil in soil and groundwater are below MTCA Method A Cleanup Levels.*
- *Using the Johnson and Ettinger vapor intrusion model it appears that residual PAHs concentrations in on-site soil and groundwater do not pose an unacceptable risk to workers in the existing or proposed future site structures (Applies to Area 3).*
- *Using Ecology's Worksheet for Calculating Soil Cleanup Levels for Unrestricted & Industrial Land Use for individual chemicals the current observed concentration of TCE (Area 1) and TPH (Area 3) in soil meets current MTCA Method B cleanup levels and is protective of groundwater.*
- *Based on a review of records at the Washington Department of Ecology, it appears the closest possible sensitive receptor is the Snohomish River, located approximately 1/2 mile to the east of the site. Based on the attenuation observed on site, the likelihood that this receptor could be affected by the subject property appears to be low. No wetlands or drinking water wells were reported within approximately one mile of the subject property. The City of Everett provides water to the subject property and surrounding area. The water is obtained from surface sources collected approximately 10 to 20 miles east. It is unlikely the shallow aquifer below the site would be developed for beneficial uses.*
- *The site as well as adjacent and downgradient properties are currently used and zoned for industrial purposes. It is unlikely the site or downgradient properties would be used for residential purposes in the foreseeable future, further mitigating concern about residual TPH, PAHs or HVOCs* [Halogenated Volatile Organic Compounds].
- *Proposed restrictive covenants would likely include requirement to excavate any heavy oil impacted soil during future redevelopment of the site, restriction on use of groundwater from the site, and deed restrictions.*

1.5 Adapt Engineering, Inc., February 2009 – Supplemental Phase II Environmental Site Assessment

In 2007, a Supplemental Phase II Environmental Site Assessment (Phase II ESA) was conducted by Adapt Engineering, Inc. (Adapt). The results of the Supplemental Phase II ESA were submitted to Ecology in a report dated February 6, 2009. The purpose of this Phase II ESA was to comply with additional sampling requirements requested by Ecology in an April 18, 2007 VCP "Opinion letter". According to Adapt, the "Opinion Letter" stated:

- *"Determination of the areal extent and depth of the trichloroethene groundwater contamination at the paint and solvent storage area using groundwater monitoring wells is needed. The groundwater wells should be sampled quarterly for at least one year. Geoprobe data alone does not offer a complete picture of the aquifer dynamics and is not sufficient."*
- *"Determination of the areal extent and depth of a possible plume from the former heating oil tank location using groundwater monitoring wells is needed. The*

groundwater wells should be sampled quarterly for at least one year. Geoprobe® data alone does not offer a complete picture of the aquifer dynamics and is not sufficient."

- *"Because the groundwater flow direction at the former fuel tanks location is southeast as well as east, groundwater monitoring wells located southeast of this feature are needed to determine if an off-site plume of contamination is present."*
- *"If the decision for the soil contamination beneath the building at the former fuel tanks location is to leave it in place and not to remediate it. it will be necessary to show, with cross-sections and engineering analysis, why the soil may not be remediated. It is also necessary to show by analysis that the cost of remediation of the soil is disproportionate to leaving it in place."*

In June 2007, a total of eight direct push borings were advanced on site as well as four hollow-stem auger borings which were completed as 2-inch diameter monitoring wells. Groundwater samples were collected from Wells MW1 and MW4 though MW7 on August 20, 2007 and January 17, 2008.

Soil samples collected from borings in Area 1 (Former Paint Shop Area), Borings P20A through P22, did not exhibit detectible concentrations of VOCs. Groundwater samples collected from Wells MW5, MW6, and MW7 between August 2007 and August 2008 also did not exhibit detectible concentrations of VOCs over four consecutive quarters of groundwater monitoring (Table 1, Appendix B).

Soil samples from borings advanced in Area 3 (Former Fuel Tank Area), Borings P-23 through P-27, did not contain detectible concentrations of DRO, ORO, naphthalene, or PAHs except for soil sample P-26:12-14. While this sample contained DRO, ORO, and naphthalene below the MTCA Method A Cleanup Level, it contained a concentration of benzo(a)pyrene at 6.1 mg/kg with a total toxic equivalent concentration (TEQ) of 8.2 mg/kg, both above the MTCA Method A Cleanup Level (Table 5, Appendix B).

Groundwater samples collected from Area 3 revealed ORO above the MTCA Method A Cleanup in Borings P-26 and P-27. DRO and cPAHs above the MTCA Method A Cleanup Level were also reported in the sample from Boring P-26 (Table 6, Appendix B).

Adapt concluded the following:

- That further groundwater monitoring would not be necessary in Area 1 based on four consecutive quarters of groundwater monitoring which indicated that TCE was below laboratory reporting limits.
- That further groundwater monitoring would not be necessary in Area 3 based on four consecutive quarters of groundwater monitoring in Monitoring Well MW4 which indicated that groundwater contamination was not migrating and was not anticipated to migrate because the source (the fuel tanks) had been removed..
- Adapt argued that excavation of the residual contamination in Area 3 would likely affect the structural integrity of the building due to the sandy nature of soil observed on site. Adapt went

on to say that the contamination is not anticipated to be migrating and that the retaining wall adjacent to the contaminated area may be acting as a barrier to contamination migration.

- That further assessment in Area 2 (Former Heating Oil Tank) was not necessary because samples in the vicinity of the former heating oil tank revealed concentrations of contaminants below the MTCA Method A Cleanup Levels.

1.6 Department of Ecology, June 2010 – Further Action Letter

Upon review of the Supplemental Phase II ESA, Ecology issued a "Further Action Letter" to Acrowood dated June 22, 2010 indicating that further remedial action was necessary to clean up contamination at the site. Ecology indicated that:

- The characterization of the site was not sufficient to establish cleanup standards and to select a cleanup action,
- A terrestrial ecological evaluation (TEE) had not yet been completed and it was therefore unknown if soil cleanup standards protective of terrestrial species were required, and
- That groundwater characterization had not been completed for the area around the former heating oil UST, and required that groundwater testing be conducted.

Ecology also indicated about the paint solvent storage area (Area 1):

> *"Ecology does agree that groundwater monitoring in the area of the former paint and solvent storage shed indicates hat there is no longer a TCE impact."*

1.7 EcoCon Inc., September 2011 – Focused Subsurface Investigation

On July 21, 2011, ECI advanced a total of six borings (Borings ECIA2B-1 and ECIA2B-2 in Area 2 and Borings ECIA3B-1, ECIA3B-2, ECIA3B-3 and ECIMW-5 in Area 3) as part of a Focused Subsurface Investigation (FSI) on the Subject Property. The purpose of the FSI was to:

- Address a portion of the Ecology comments in the "Further Action Opinion Letter" dated June 22, 2010;
- Further characterize the extent of soil and groundwater contamination previously identified by others at the Site; and
- To determine if soil contamination in Area 3 was present below the groundwater table as previously reported.

The maximum depth of exploration during the FSI was approximately 14 feet bgs in Area 2 and 20.5 feet bgs in Area 3. Groundwater samples were collected from all boring locations except Boring ECIMW-5, which was completed as a monitoring well with a 1-inch diameter PVC casing and 0.010-inch factory slotted well screen.

A total of 11 soil samples and 5 ground water samples were submitted to ESN Northwest Inc. Chemistry Laboratory in Olympia, Washington for analysis of DRO and ORO using Ecology Method NWTPH-Dx. In a

addition, one soil sample and one groundwater sample were selected for additional analysis of PAHs using EPA Method 8270 based on initial analytical results.

On August 25, 2011, ECI returned to the Site to develop, monitor, and sample Monitoring Well ECIMW-5, monitor and sample Wells MW-1 and MW-4. Groundwater samples obtained from Wells MW-1, MW-4 and ECIMW-5 were submitted to ALS Environmental Laboratory (ALS) in Everett, Washington for analysis of DRO and ORO using Ecology Method NWTHP-Dx and PAHs using EPA Method 8270SIM (Table 6, Appendix B).

Of the 11 soil samples collected, only soil sample ECIA3B-2:12 was above the MTCA Method A Cleanup Level for the contaminants analyzed. Soil sample ECIA3B-2:12 contained concentrations of DRO, ORO, total naphthalenes, and cPAHs above the MTCA Method A Cleanup Level (Table 5, Appendix B).

Of the eight groundwater samples collected, one sample (ECIA3B-1GW) was above the MTCA Method A Cleanup Level for DRO, but below the MTCA Method A Cleanup Level for total naphthalene and cPAHs. However, the laboratory reporting limit for cPAHs for this sample was 0.1 µg/L, which makes it possible for the concentration of PAHs as benzo(a)pyrene as calculated using the total equivalency calculation to be greater than 0.1 µg/L, and thus above the MTCA Method A Cleanup Level. The analytical results of the groundwater sample (ECIMW5-5) collected from the newly installed Well MW5 revealed that cPAHs were present below the MTCA Method A Cleanup Level with a total equivalency concentration of 0.046 µg/L

The following conclusions were reported by ECI:

- FSI soil and groundwater data combined with previous investigation data were sufficient to characterize the extent of soil and groundwater impacts at the Site.
- Soil and groundwater impacts previously observed in Area 1 have been remediated through natural attenuation and no further action is necessary in Area 1.
- Groundwater characterization has been completed in Area 2 as per Ecology's request. No target analytes were detected in groundwater above laboratory detection limits and all previous soil concentrations in this area had been below MTCA Method A Soil Cleanup Levels. Therefore, no further action is necessary in Area 2.
- Soil in Area 3 is impacted with DRO, ORO, cPAHs, and naphthalenes at concentrations exceeding applicable MTCA Method A Soil Cleanup Levels. Soil impacts in Area 3 are confined to a relatively small area and do not appear to extend off-Site. It is estimated that approximately 60 yards of impacted soil remain in place in this location and that some of this soil is likely situated beneath the building.
- The soil impacts in Area 3 do not appear to be present below the groundwater table as previously reported.
- It would not be cost effective to excavate the small amount of impacted soil in Area 3 due to excessive costs associated with supporting the building and retaining wall during excavation activities.
- Groundwater in Area 3 is impacted with DRO, ORO, and cPAHs at concentrations exceeding MTCA Method A Groundwater Cleanup Levels. Groundwater impacts in Area 3 are confined to a relatively small area and do not appear to extend off-Site.

- The observed decreases in dissolved-phase concentrations of DRO, ORO, and cPAHs from July 2007 to July 2011 in the location of Borings ECIA3B-2 and P-26 indicate that natural attenuation may be effective at remediating the observed groundwater impacts at the Site.
- The installation of groundwater monitoring well ECIMW-5 has satisfied Ecology's requirement to install a monitoring well downgradient and south of the former excavation area in Area 3.

Based on the findings of the FSI, ECI recommended the following:

- *"ECI recommended leaving the estimated 60 yards of impacted soil in place and allowing ground water impacts to naturally attenuate. This would involve requesting a No Further Action (NFA) determination from Ecology with an Environmental Covenant. ECI noted that Ecology would likely require the installation of additional ground water monitoring wells in the impacted area and upgradient along with continued ground water monitoring to achieve this goal."*
- *"Ecology has indicated in previous opinion letters that a Feasibility Study (FS), including a disproportionate cost analysis (DCA) would be needed to support the selected cleanup action of leaving contaminated soil in place and implementing institutional controls. Ecology has also indicated that a Terrestrial Ecological Evaluation (TEE) needs to be completed for the Site. Given the labor intensive nature of these actions and the fact that Ecology has recently assigned a new Project Manager to the Site, ECI recommends scheduling a meeting with the new Project Manager once he has had the opportunity to review this report. The intent of the meeting would be to determine that the next actions taken at the Site are appropriate and cost effective. "*

1.8 Department of Ecology, January 2012 – Opinion Letter

Ecology issued an Opinion Letter dated January 23, 2012 which reviewed the following documents:

- Phase II Environmental Site Assessment, Acrowood Corporation Facility, 4425 South 3rd Avenue, Everett, Washington, prepared by Adapt Engineering Inc., February 6, 2011
- Letter from Brad Gilmore, Washington State Department of Ecology. Re: Opinion Letter on further action at Acrowood Corporation Facility, 4425 South 3rd Avenue, Everett, Washington. June 10, 2011
- Focused Subsurface Investigation, 4425 South 3rd Avenue, Everett, Washington, prepared by EcoCon Inc., September 30, 2011.

Ecology's opinion stated that:

- "*A TEE had not yet been completed at the site and that a preliminary evaluation indicated that an exclusion is not appropriate, and a simplified TEE is necessary,"*
- *"In the previous opinion letter by Ecology issued for this site, a Feasibility Study (FS) was identified as necessary to support the needed cleanup action of leaving the contaminated soil in place and implementing institutional controls…*" [referring to Area 3 where Adapt had proposed an environmental covenant to obtain an NFA for this area], and

- "*If institutional controls (i.e. environmental covenant) will be part of the selected cleanup action, a copy of the covenant will need to be included with the FS.*"

1.9 EcoCon, Inc., December 2019 – Groundwater Monitoring Well Installation & Sampling Report

On November 12, 2019, ECI oversaw the installation of four additional groundwater monitoring wells in Area 3 of the Subject Property (Wells MW6 through MW9). These wells were installed with the intent of monitoring the groundwater over four consecutive quarters before petitioning the Department of Ecology for a "No Further Action" determination with an Environmental Covenant to be prepared for the Subject Property.

The following wells were installed if Area 3 of the Subject Property (Figure 4, Appendix A):

- **MW6** was installed northeast of the known impacted area in the anticipated downgradient direction.
- **MW7** was installed southeast of the known impacted area in the anticipated downgradient direction.
- **MW8** was installed directly through the known impacted soil area. This well is the most likely to have groundwater impacted by the COCs.
- **MW9** was installed inside of the building adjacent to the known impacted area in the anticipated upgradient position.

It should be noted that the wells installed by ECI are distinct from wells MW-5, MW-6, and MW-7 installed by Adapt in Area 1.

Analytical results of soil samples collected during the well installation revealed DRO, ORO, and cPAHs below the MTCA Method A Cleanup Level in Well MW7 and cPAHs below the MTCA Method A Cleanup Level in Well MW9. Analytical results of soil sample MW8-15 collected from the boring for Well MW8 at a depth of approximately 15 feet bgs revealed DRO, ORO, naphthalene, and cPAHs above the MTCA Method A Cleanup Level. Additional analysis of samples MW8-5 and MW8-19 indicated that the vertical extent of DRO and ORO contamination above the MTCA Method A Cleanup Level in the vicinity of MW8 is between 5 and 19 feet bgs (Table 5, Appendix B).

On November 13 and November 14, 2019, groundwater samples were collected from the seven groundwater- monitoring wells installed within Area 3 of the Subject Property. The samples were collected to evaluate groundwater quality and potential mobility of contaminants in Area 3.

The analytical results revealed concentrations of DRO, ORO, naphthalene, and cPAHs above their respective MTCA Method A Cleanup Levels in the groundwater sample collected from Well MW8, and cPAHs above the MTCA Method A Cleanup Level in the groundwater sample collected from Well MW5 (Table 6, Appendix B).

ECI recommended that the groundwater impact of cPAHs in the vicinity of Well MW5 be fully delineated. Following delineation, the source of the groundwater contamination will need to be remediated, and four consecutive quarters of groundwater monitoring completed before Ecology can be petitioned for a "No Further Action" determination.

2.0 CURRENT CLEANUP STATUS

2.1 Area 1 – Paint Solvent Storage Area

In the "Further Action" Letter issued to Acrowood by Ecology in June 2010; Ecology stated:

> "*Ecology does agree that the groundwater monitoring in the area of the former paint and solvent storage shed indicates that there is no longer a TCE impact*."

Based on the previous consulting work in Area 1 performed by Adapt, and the opinion given by Ecology in their June 2010 Further Action Letter, ECI has determined that Area 1 does not require any further investigation.

2.2 Area 2 – Former Heating Oil UST

In the Opinion Letter dated June 22, 2010, Ecology indicated that,

> *"Groundwater characterization has not been completed for the area around the former heating oil UST [Area 2] located by the shipping and receiving dock."*

In September 2011, ECI reported in their "*Focused Subsurface investigation*" (FSI) report that,

> *"Groundwater characterization has been completed in Area 2 as per Ecology's request. No target analytes were detected in groundwater above laboratory detection limits and all previous soil concentrations in this area had been below MTCA Method A Soil Cleanup Levels. Therefore, no further action is necessary in Area 2."*

Based on the request by Ecology to investigate the groundwater in Area 2 in their 2010 "*Opinion Letter*" and the results of groundwater sampling in ECI's September 2011 FSI, ECI has determined that Area 2 does not require any further investigation (Table 4, Appendix B).

2.3 Area 3 – Former Fuel Tank

The most recent investigation to take place in Area 3 of the Site is the installation of four additional monitoring wells (MW6 through MW9) in the vicinity of the area impacted by a former fuel tank (See section 1.9 above for details). The purpose of this installation and monitoring event was to determine if the identified COCs for Area 3 had remained in place, and if so, apply for an environmental covenant on the basis that the contamination was immobile and could not be removed due to proximity to the steel shop.

The analytical results of the most recent groundwater monitoring indicated that DRO and ORO were present below the MTCA Method A Cleanup Level in the newly installed Monitoring Well MW7 (installed within the fire lane, southeast of the impacted area), and that DRO was present below the MTCA Method A Cleanup Level in Well MW1 and newly installed Well MW9 (installed within the steel shop, northwest of the impacted area).

Analytical results of the groundwater sample collected in Well MW5 indicated that groundwater concentrations of cPAHs were above the MTCA Method A Cleanup Level, containing a concentration of cPAHs equal to a TEQ of 0.241 µg/L Table X, Appendix B).

Prior cleanup action plans by ECI and Adapt have indicated that the cost of remediation by removal of the impacted soil would be prohibitively expensive due to the impacted area potentially extending beneath the "Steel Shop". Based on the recent groundwater monitoring event, ECI has recommended to Acrowood that further delineation of the cPAHs in groundwater take place in Area 3, and that the feasibility of the removal of the source material be revisited.

ECI has indicated to Acrowood that excavation of at least part of the source material is likely to be necessary, and the most effective cleanup route. However, if contamination is found to extend beneath the "Steel Shop" complete removal of the impacted soil may not be possible so long as the building is standing. ECI had previously indicated to Acrowood that a Feasibility Study (FS) and Disproportionate Cost Analysis (DCA) will need to be completed if closure in place is to be selected to be part of a potential cleanup action.

ECI has scheduled a discussion with Acrowood to take place after the first of the year in 2020. At that time, ECI will present potential remediation strategies and will submit a plan to Ecology.

2.4 Terrestrial Ecological Evaluation

ECI recognizes that an updated terrestrial ecological evaluation (TEE) evaluation is required for site closure, and that Ecology has requested a TEE for the site in their letters from 2012 and 2010. Following the remediation of Area 3, ECI plans to submit an updated TEE for the entire Site to accompany a Cleanup Action and Site Closure Report.

3.0 CLOSING

ECI is currently working with Acrowood to determine the best course of action for cleanup in Area 3 of the Site located at 4425 South 3rd Avenue, Everett, Washington. The groundwater and soil in the vicinity of the former fuel tank in Area 3 were better characterized in the monitoring well installation and sampling event conducted in November, 2019. Based on the results of the most recent groundwater monitoring event, Acrowood will continue to monitor the groundwater in the impacted area, and will be considering remedial actions which will be presented to Acrowood by ECI in early 2020.

Along with this "Status Report", the most recent "*Monitoring Well Installation & Groundwater Sampling Report*" dated December 12. 2019 will be submitted to Ecology for review. Future investigations and sampling events conducted for Acrowood by ECI will also be submitted to Ecology as they become available.

A meeting is scheduled with Acrowood in January 2020 to discuss potential remedial actions at the Site. Once a remediation option has been selected by Acrowood, ECI will develop a Feasibility Study with a Disproportionate Cost Analysis, a work plan, and revised schedule to be submitted to Ecology with a request for an opinion under the VCP.

Please contact us if you have any questions or concerns.

Thank You,

Stephanie Holt
Staff Geologist
EcoCon, Inc

David R. Polivka L.G. / L.Hg.
Senior Hydrogeologist

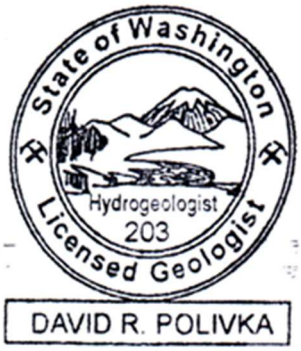

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Figure 1: Site Location Map

Figure 2: Site Topographic Map

Figure 3: Soil Sample Location Map

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N
Not To Scale

Site Location Map
Cleanup Status Report
4425 S 3rd Ave
Everett, Washington 98203

Date:	December 16, 2019
Completed By:	C. Long
Reviewed By.:	S. Spencer
Version:	ECI-001
Project No.:	0377-08

Figure No.: 01
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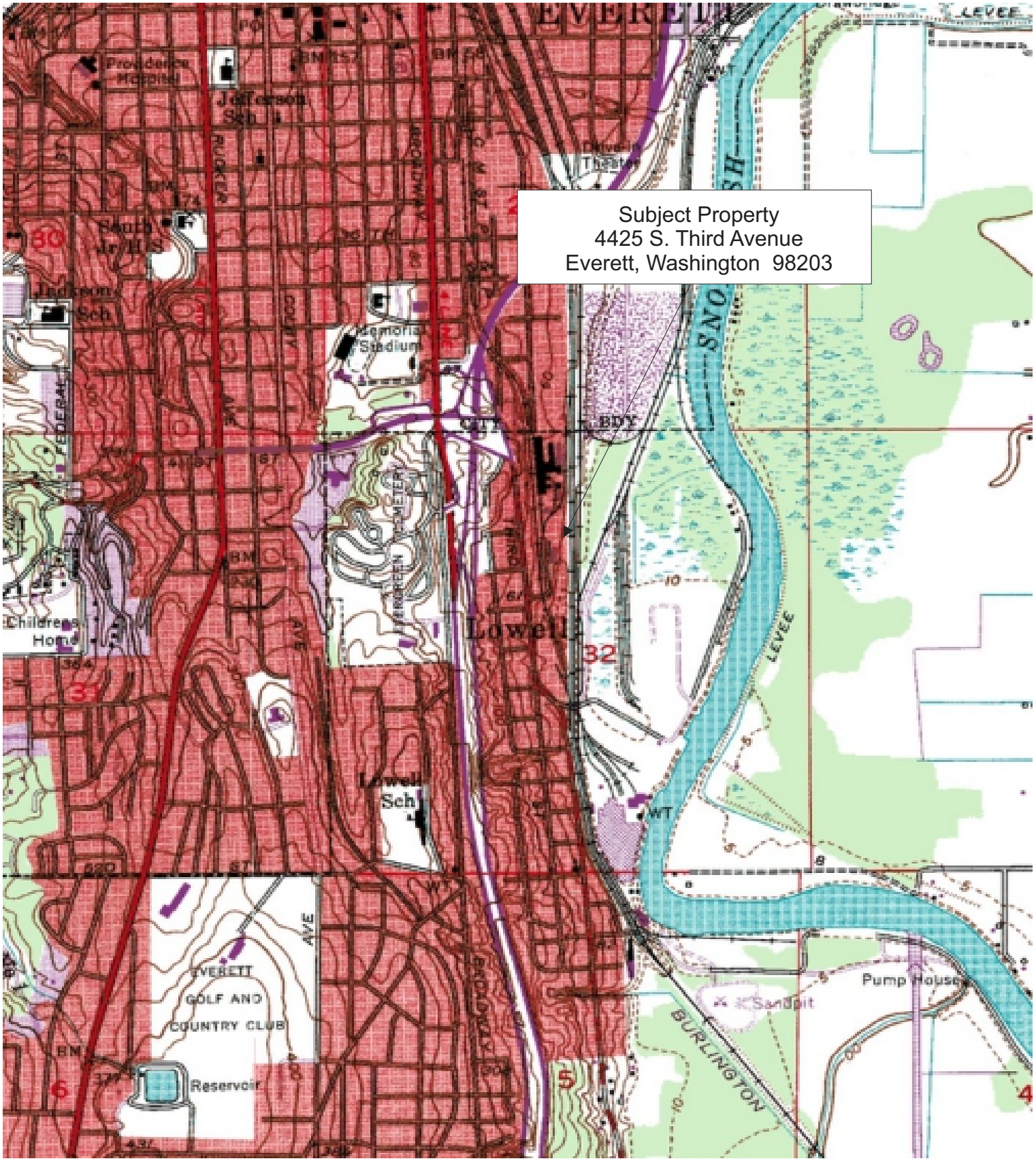

N
Not To Scale

Site Topographic Map
Cleanup Status Report
4425 S 3rd Ave
Everett, Washington 98203

Date:	December 16, 2019
Completed By:	C. Long
Reviewed By.:	S. Spencer
Version:	ECI-001
Project No.:	0377-08

Figure No.: 02
Sheet 02 of 04

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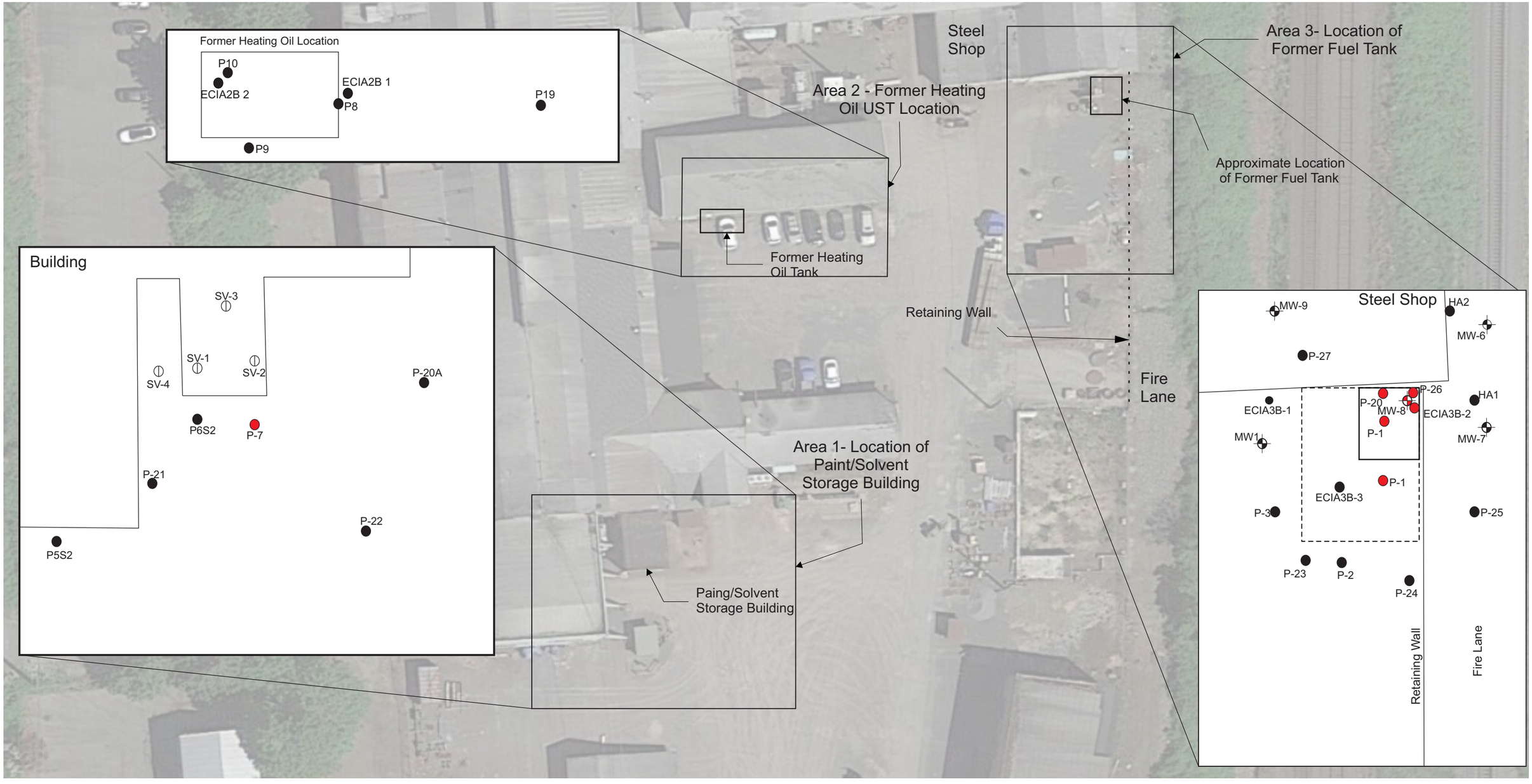

N

0 25 50 100

Approximate Scale

- Boring Sample Locations > MTCA
- Boring Sample Locations < MTCA
- Monitoring Well Sample Locations <MTCA
- Monitoring Well Sample Locations > MTCA
- Soil Vapor Sample Locations

Soil Sample Location Map
Cleanup Status Report
4425 S 3rd Ave
Everett, Washington 98203

Date:	December 16, 2019
Completed By:	C. Long
Reviewed By.:	S. Spencer
Version:	ECI-001
Project No.:	0377-08

Figure No.: 03

Sheet 03 of 04

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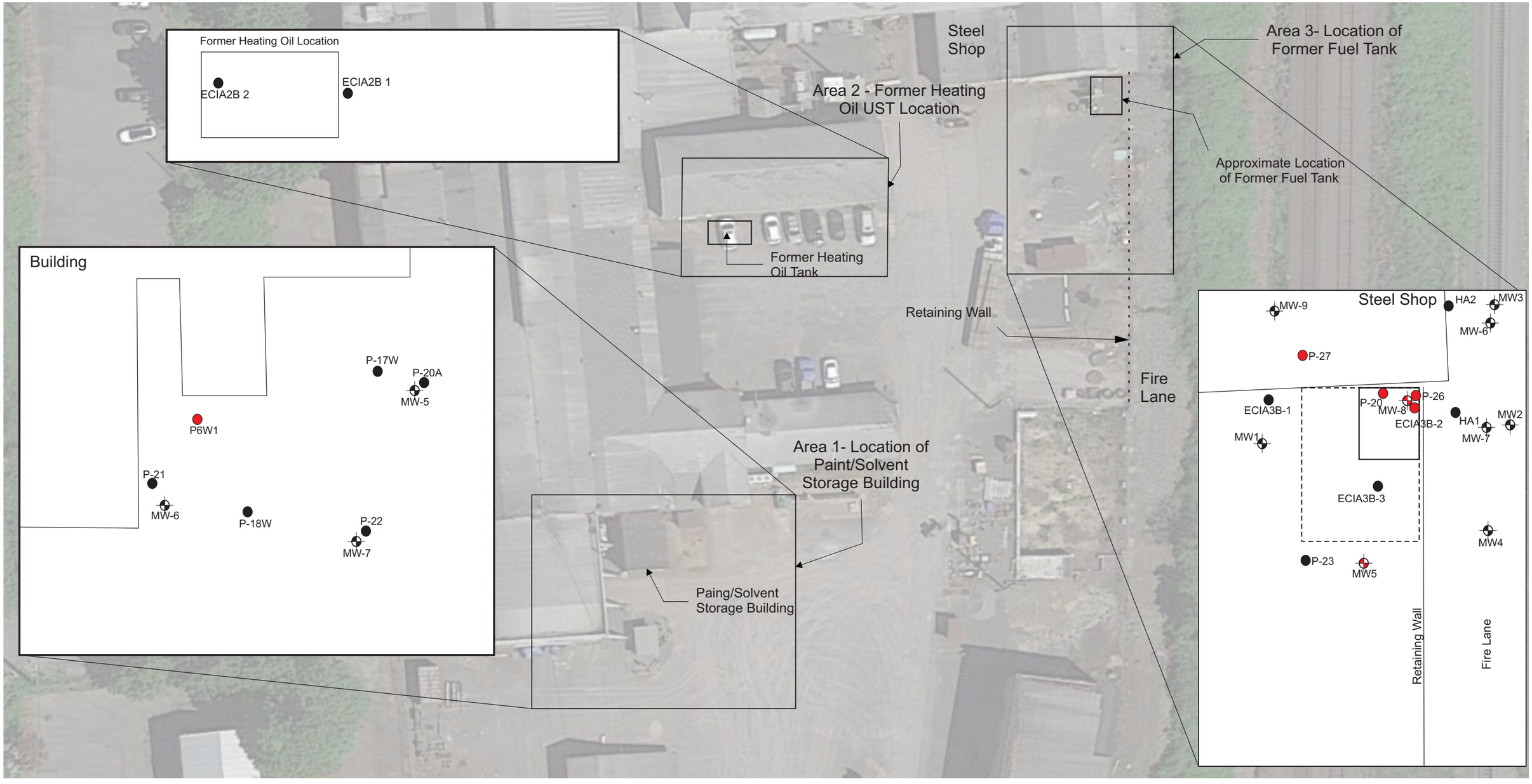

N

0 25 50 100

Approximate Scale

- Boring Sample Locations > MTCA
- Boring Sample Locations < MTCA
- Monitoring Well Sample Locations <MTCA
- Monitoring Well Sample Locations > MTCA

Groundwater Sample Location Map
Cleanup Status Report
4425 S 3rd Ave
Everett, Washington 98203

Date:	December 16, 2019
Completed By:	C. Long
Reviewed By.:	S. Spencer
Version:	ECI-001
Project No.:	0377-08

Figure No.: 04

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Appendix B – Project Tables

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Table 1: Summary of Area 1 Soil Analytical Results

Acrowood - Cleanup Status Report

4425 S 3rd Avenue, Everett, Washington

Sample ID	Sample Depth (ft)	Date Sampled	Select Volatile Organic Compounds by EPA Method 8260B (mg/kg)								
			Benzene	Toluene	Ethylbenzene	Total Xylenes	cis-1,2-Dichloroethylene	Trichloroethylene	Tetrachloroethylene	Acetone	1,1-Dichloroethylene
P5S2	8	11/3/1999	ND	ND	ND	ND	ND	ND	ND	ND	ND
P6S2	8	11/3/1999	ND	ND	ND	ND	ND	ND	ND	ND	ND
P7S2	8	11/3/1999	ND	ND	ND	ND	ND	**0.055**	ND	ND	ND
SV-1-4	2.5-4	3/27/2000	ND	ND	ND	ND	ND	ND	ND	ND	ND
SV-2-3.5	2.5-3.5	3/27/2000	ND	ND	ND	ND	ND	ND	ND	ND	ND
SV-3-3.5	2.5-3.5	3/27/2000	ND	ND	ND	ND	ND	ND	ND	ND	ND
SV-4-3.5	2.5-3.5	3/27/2000	ND	ND	ND	ND	ND	ND	ND	ND	ND
P20A	10-12	7/24/2007	<0.03	<0.05	<0.06	<0.1	<0.05	<0.03	<0.026	<0.5	<0.05
P-21	8-10	7/24/2007	<0.03	<0.05	<0.06	<0.1	<0.05	<0.03	<0.026	<0.5	<0.05
P-22	8-10	7/24/2007	<0.03	<0.05	<0.06	<0.1	<0.05	<0.03	<0.026	<0.5	<0.05
Laboratory Reporting Limit			0.030	0.05	0.06	0.10	0.05	0.03	0.026	0.5	0.05
Ecology MTCA Method A Cleanup Levels			0.03	7	6	9	NE	0.03	0.05	NE	NE

Notes:

mg/kg = Milligrams per kilogram

MTCA = Model Toxics Control Act

-- = not analyzed for this constituent

< = not detected above laboratory detection limits

NE = Ecology has not designated a MTCA Method A cleanup level for this constituent

Bold indicates a detected concentration that is below Ecology MTCA Method A Cleanup Levels

Bold and Shaded indicates the detected concentration exceeds Ecology MTCA Method A or B Cleanup Levels

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Table 2: Summary of Area 1 Groundwater Analytical Results

Acrowood - Cleanup Status Report

4425 S 3rd Avenue, Everett, Washington

Sample Number	Date Sampled	Select Volatile Organic Compounds by EPA Method 8260B (µg/l)								
		Benzene	Ethylbenzene	Toluene	Xylenes	cis-1,2-Dichloroethylene	Trichloroethylene	Tetrachloroethylene	Acetone	1,1-Dichloroethylene
Groundwater Samples from Temporary Wells										
P6W1	11/3/1999	ND	ND	ND	ND	ND	**8.38**	ND	ND	ND
P-17W	11/3/1999	ND	ND	ND	ND	ND	**4.9**	ND	ND	ND
P-18W	11/3/1999	ND	ND	ND	ND	ND	**0.27**	ND	ND	ND
P20A	7/24/2007	<1	<1	<1	<2	<1	<1	<1	<10	<1
P-21	7/24/2007	<1	<1	<1	<2	<1	<1	<1	<10	<1
P-22	7/24/2007	<1	<1	<1	<2	<1	<1	<1	<10	<1
Monitoring Well Results										
MW-5	8/20/2007	<1	<1	<1	<2	<1	**1.6**	<1	<10	<1
	1/17/2008	<1	<1	<1	<2	<1	<1	<1	<10	<1
	3/21/2008	<1	<1	<1	<2	<1	<1	<1	<10	<1
	8/7/2008	<1	<1	<1	<2	<1	<1	<1	<10	<1
MW-6	8/20/2007	<1	<1	<1	<2	<1	<1	<1	<10	<1
	1/17/2008	<1	<1	<1	<2	<1	<1	<1	<10	<1
	3/21/2008	<1	<1	<1	<2	<1	<1	<1	<10	<1
	8/7/2008	<1	<1	<1	<2	<1	<1	<1	<10	<1
MW-7	8/20/2007	<1	<1	<1	<2	<1	<1	<1	<10	<1
	1/17/2008	<1	<1	<1	<2	<1	<1	<1	<10	<1
	3/21/2008	<1	<1	<1	<2	<1	<1	<1	<10	<1
	8/7/2008	<1	<1	<1	<2	<1	<1	<1	<10	<1
Laboratory Reporting Limit		1	1	1	1	1	1	1	10	1
Ecology MTCA Method A Cleanup Levels		5	700	1,000	1,000	NE	**5**	**5**	NE	NE

Notes:

(µg/l) = micrograms per liter

-- Not analyzed for constituent

< or ND Not detected above the laboratory reporting limit

Bold indicates the detected concentration is below Ecology MTCA Method A cleanup levels

Red Bold indicates the detected concentration exceeds Ecology MTCA Method A cleanup level

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Table 3: Summary of Area 2 Soil Analytical Results
Acrowood - Cleanup Status Report
4425 S 3rd Avenue, Everett, Washington

Sample ID	Sample Depth (ft)	Date Sampled	Petroleum Hydrocarbon Identification by NWTPH-HCID (mg/kg)			Petroleum Hydrocarbons by NWTPH-Dx (mg/kg)	
			Gasoline Range Organics	Diesel Range Organics	Oil Range Organics	Diesel (DRO)	Heavy Oil (ORO)
P8S3	8.5	11/3/1999	<20	**>50**	**>100**	**983**	**1,920**
P9S3	12	11/3/1999	<20	<50	<100	--	--
P10S3	12	11/3/1999	<20	<50	<100	--	--
P19-9	6-9	4/17/2000	--	--	--	<30	<60
Laboratory Reporting Limit			20	50	100	25	50
Ecology MTCA Method A Cleanup Levels			--	--	--	2,000	2,000

Notes:
mg/kg = Milligrams per kilogram
MTCA = Model Toxics Control Act
-- not analyzed for this constituent or not applicable
> analyte detected but not quantified
< not detected above laboratory detection limits
Bold indicates a detected concentration that is below Ecology MTCA Method A Cleanup Levels
Bold and Shaded indicates the detected concentration exceeds Ecology MTCA Method A or B Cleanup Levels

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Table 4: Summary of Area 2 Groundwater Analytical Results
Acrowood - Cleanup Status Report
4425 S 3rd Avenue, Everett, Washington

Sample Number	Date Sampled	Petroleum Hydrocarbons by NWTPH-Dx (µg/L)	
		Diesel (DRO)	Heavy Oil (ORO)
ECIA2B-1GW	7/21/2011	<250	<500
ECIA2B-2GW	7/21/2011	<250	<500
Laboratory Reporting Limit		250	500
Ecology MTCA Method A Cleanup Levels		500	500

Notes:
MTCA = Model Toxics Control Act
(µg/l) = micrograms per liter
< or ND indicates Not detected above the laboratory reporting limit
Bold indicates the detected concentration is below Ecology MTCA Method A cleanup levels
Red Bold indicates the detected concentration exceeds Ecology MTCA Method A cleanup level

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Table 5: Summary of Area 3 Soil Analytical Results
Acrowood - Cleanup Status Report
4425 S 3rd Avenue, Everett, Washington

Sample ID	Sample Depth (ft)	Date Sampled	Total Petroleum Hydrocarbons (NWTPH-DX) (mg/kg)		Semivolatile Organic Compounds (EPA 8270 SIM) (mg/kg)																		
			Diesel (DRO)	Heavy Oil (ORO)	Naphthalene	2-Methyl naphthlene	1-Methyl naphthlene	Total Naphthalene	Acenaphthylene	Acenaphthene	Fluorene	Phenanthrene	Anthracene	Fluoranthene	Pyrene	Benzo (a) anthracene	Chrysene	Benzo (b) fluoranthene	Benzo (k) fluoranthene	Benzo (a) pyrene	Indeno (1,2,3-cd) pyrene	Dibenz (a,h) anthracene	Benzo (g,h,i) perylene	cPAHs TEQ as Benzo (a) Pyrene
Adapt Engineering Historical Soil Results																							
P1S4	16	11/3/1999	**10,000**	**4,010**	-	-	-	**11.8**	**1.21**	**6.27**	**7.86**	**28.2**	**6.94**	**2.86**	**11.3**	**4.62**	**7.01**	**0.705**	<ND	**1.53**	<ND	<ND	**0.745**	**2.133**
P1S6	22	11/3/1999	<ND	<ND	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	--
P2S3	12	11/3/1999	<ND	<ND	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	--
P3S3	12	11/3/1999	**134**	**210**	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	--
P20-12	9-12	4/17/2000	-	-	-	-	-	**16**	<ND	**7.9**	**12**	**33**	**7.1**	**2.1**	**11**	**5.1**	**8**	<2	<2	**1.4**	<ND	<ND	<2	**1.99**
P20-16	12-16	4/17/2000	<ND	<ND	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	--
HA1-4	3-4	4/17/2000	**75**	**500**	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	--
HA2-5	4-5	4/17/2000	<ND	<ND	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	--
P-23	12-14	7/23/2007	<50	<100	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	--
P-24	12-14	7/23/2007	<50	<100	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	--
P-25	4-6	7/24/2007	<50	<100	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	--
P-26	12-14	7/24/2007	**440**	**580**	-	-	-	**1.9**	<0.5	**1.9**	**2**	**5.8**	**1.6**	**1.7**	**4.3**	**3.1**	**5**	**7**	**2.9**	**6.1**	**5.2**	**1.9**	**6.2**	**8.16**
P-27	12-14	7/24/2007	<50	<250	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	--
ECI Historical Soil Results																								
ECIA3B-1:4	4	7/21/2011	<50	<100	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	--
ECIA3B-1:12	12	7/21/2011	<50	<100	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	--
ECIA3B-2:8	8	7/21/2011	<50	<100	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	--
ECIA3B-2:12	12	7/21/2011	**31,000**	**2,600**	**14**	**96**	**58**	**154**	**1.5**	**11**	**2.4**	**29**	**7.3**	<ND	<ND	**0.3**	**0.61**	<ND	**0.91**	<ND	<ND	<ND	**0.61**	**0.13**
ECIA3B-2:16	16	7/21/2011	<50	<100	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	--
ECIA3B-2:17	17	7/21/2011	**250**	<100	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	--
ECIA3B-2:20	20	7/21/2011	<50	<100	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	--
ECIA3B-3:12	12	7/21/2011	<50	**200**	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	--
ECIA3B-3:16	16	7/21/2011	<50	<100	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	--
ECI 2019 Well Installation Soil Results																								
MW6-6	6	11/12/2019	<25	<50	<0.02	<0.02	<0.02	<0.02	--	--	--	--	--	--	--	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	--	<0.02
MW7-5	5	11/12/2019	**80**	**210**	<0.02	<0.02	<0.02	<0.02	--	--	--	--	--	--	--	**0.036**	**0.059**	**0.064**	<0.02	**0.039**	**0.097**	**0.022**	--	**0.06149**
MW8-5	5	11/12/2019	**27**	**120**	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW8-15	15	11/12/2019	**11,000**	**5,700**	**18**	**130**	**90**	**238**	--	--	--	--	--	--	--	**6.4**	**11**	**2.6**	**0.86**	**3.1**	**1.2**	**0.8**	--	**4.396**
MW8-19	19	11/12/2019	<25	<50	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
MW9-11	11	11/12/2019	<25	<50	<0.02	<0.02	<0.02	<0.02	--	--	--	--	--	--	--	**0.041**	**0.063**	**0.096**	**0.03**	**0.043**	**0.043**	<0.020	--	**0.06463**
Laboratory Reporting Limit			25	50	0.020	0.020	0.020	--	0.020	0.020	0.020	0.020	0.020	0.020	0.020	0.020	0.020	0.020	0.020	0.020	0.020	0.020	0.020	--
Ecology MTCA Method A Cleanup Levels			2,000	2,000	5	5	5	5	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	0.1	NE	NE	NE	0.1

Notes:
mg/kg = Milligrams per kilogram
MTCA = Model Toxics Control Act
-- = not analyzed for this constituent
< or ND = not detected above laboratory detection limits
NE = Ecology has not designated a MTCA Method A cleanup level for this constituent
Bold indicates a detected concentration that is below Ecology MTCA Method A Cleanup Levels
Bold and Shaded indicates the detected concentration exceeds Ecology MTCA Method A or B Cleanup Levels

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Table 6: Summary of Area 3 Groundwater Results
Acrowood - Groundwater Monitoring Well Installation & Sampling
4425 S 3rd Avenue, Everett, Washington

Sample Number	Date Sampled	Total Petroleum Hydrocarbons (µg/l)		Polycyclic Aromatic Hydrocarbons (PAHs) (µg/l)																		cPAHs TEQ as Benzo (a) Pyrene
		Diesel (DRO)	Heavy Oil (ORO)	Naphthalene	2-Methyl naphthlene	1-Methyl naphthlene	Total Naphthalene	Acenaphthylene	Acenaphthene	Fluorene	Phenanthrene	Anthracene	Fluoranthene	Pyrene	Benzo (a) anthracene	Chrysene	Benzo (a) pyrene	Benzo (b) fluoranthene	Benzo (k) fluoranthene	Indeno (1,2,3-cd) pyrene	Dibenz (a,h) anthracene	Benzo (g,h,i) perylene	
Adapt Engineering Temporary Well Groundwater Results																						
P-20	4/17/00	--	--	--	--	--	**60**	**2.1**	**16**	**17**	**36**	**8.7**	**2.7**	**12**	**5.6**	**8.8**	**0.77**	<0.5	**1.6**	<0.5	<0.5	**0.94**	**2.33**
HA1-W	4/17/00	<ND	<ND	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
HA2-W	4/17/00	<ND	<ND	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
P23-GW	7/23/07	**52**	<250	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
P26-GW	7/24/07	**7,800**	**3,100**	--	--	--	**58**	<1	**17**	**16**	**43**	**11**	**4.9**	**18**	**7.4**	**13**	**5.4**	**2.3**	**6.2**	**3.4**	**1.1**	**4.4**	**8.29**
P27-GW	7/24/07	**160**	**510**	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
ECI Temporary Well Groundwater Results																							
ECIA3B-1GW	7/21/2011	<250	<500	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
ECIA3B-2GW	7/21/2011	**920**	<500	**6**	**15**	**12**	**33**	**0.1**	**0.3**	**0.2**	--	<0.1	<0.1	--	**0.1**	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	--	**0.01**
ECIA3B-3GW	7/21/2011	<250	<500	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Monitoring Well Results																							
MW1	8/10/00	<250	<500	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND
	11/15/00	<250	<500	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND
	2/23/01	<250	<500	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND
	6/5/01	<250	<500	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND
	6/20/07	<50	<250	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	1/17/08	<50	<250	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	3/21/08	<50	<250	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	8/7/08	<50	<250	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	8/25/11	<130	<250	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02
	11/13/19	**150**	<250	<0.040	<0.040	<0.040	<0.040	--	--	--	--	--	--	--	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	--	<0.040
MW2	8/10/00	<250	<500	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND
	11/15/00	<250	<500	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND
	2/23/01	<250	<500	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND
	6/5/01	<250	<500	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND
	Well reported to be destroyed - was decomissioned by Adapt Engineering																						
MW3	8/10/00	<250	<500	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND
	11/15/00	<250	<500	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND
	2/23/01	<250	<500	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND
	6/5/01	<250	<500	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND	<ND
	Well reported to be destroyed - was decomissioned by Adapt Engineering																						
MW4	8/10/00	<50	<250	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	11/15/00	<50	<250	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	2/23/01	<50	<250	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	6/5/01	<50	<250	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	11/13/19	<130	<250	<0.040	<0.040	<0.040	<0.040	--	--	--	--	--	--	--	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040		<0.040
A3-MW5	8/25/11	<130	<250	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	**0.036**	**0.034**	**0.03**	**0.041**	**0.048**	**0.03**	**0.032**	**0.028**	<0.02	**0.036**	**0.046**
	11/13/19	<130	<250	<0.040	<0.040	<0.040	<0.040	--	--	--	--	--	--	--	**0.16**	**0.21**	**0.31**	**0.13**	**0.16**	**0.13**	**0.054**	--	**0.2405**
A3-MW6	11/13/19	<130	<250	<0.040	<0.040	<0.040	<0.040	--	--	--	--	--	--	--	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	--	<0.040
A3-MW7	11/13/19	**320**	**400**	<0.040	<0.040	<0.040	<0.040	--	--	--	--	--	--	--	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	--	<0.040
MW8	11/14/19	**16,000**	**4,000**	**32**	**71**	**71**	**174**	--	--	--	--	--	--	--	**0.22**	**0.33**	**0.068**	<0.040	**0.079**	<0.040	<0.040	--	**0.1111**
MW9	11/13/19	**200**	<250	<0.040	**0.17**	**0.2**	**0.37**	--	--	--	--	--	--	--	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	<0.040	--	<0.040
Ecology MTCA Method A Cleanup Levels		500	500	160	160	160	160	NE	NE	NE	NE	NE	NE	NE	NE	NE	0.1	NE	NE	NE	NE	NE	0.1

Notes:
(µg/l) = micrograms per liter
-- Not analyzed for constituent
< or ND indicates Not detected above the laboratory reporting limit
Bold indicates the detected concentration is below Ecology MTCA Method A cleanup levels
Red Bold indicates the detected concentration exceeds Ecology MTCA Method A cleanup level