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COMPREHENSIVE CLEANUP ACTION REPORT: EMPIRICAL DEMONSTRATION, GROUNDWATER MODELING, AND SITE-WIDE NO FURTHER ACTION DETERMINATION REQUEST

FORMER CLEANING CENTER OF REDMOND 15796 REDMOND WAY REDMOND, WASHINGTON

Submitted by: Farallon Consulting, L.L.C. 975 5th Avenue Northwest Issaquah, Washington 98027

Farallon PN: 650-001

For: Nelgroup Properties LLC 16508 Northeast 79th Street Redmond, Washington 98052

January 3, 2019

Prepared by:

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Reviewed by:

Branolar urisle



Brani Jurista, L.G. Principal Geologist



TECHNICAL MEMORANDUM

то:	Glynis Carrosino – Washington State Department of Ecology Northwest Regional Office (by email and mail)
cc:	Thomas Markl – Nelgroup Properties LLC (by email) Mike Warfel – Washington State Department of Ecology (by email)
FROM:	Jennifer L. Moore, Senior Scientist; Norman D. Colby, L.G., L.H.G, Principal Hydrogeologist; and Brani Jurista, L.G., Principal Geologist
DATE:	January 3, 2019
RE:	REQUEST FOR SITE-WIDE NO FURTHER ACTION DETERMINATION FORMER CLEANING CENTER OF REDMOND 15796 REDMOND WAY REDMOND, WASHINGTON FACILITY/SITE IDENTIFICATION NO. 26296554 VCP IDENTIFICATION NO. NW3166 FARALLON PN: 650-001

Farallon Consulting, L.L.C. (Farallon) has prepared this Technical Memorandum to provide supplemental information required by the Washington State Department of Ecology (Ecology) for issuance of a Site-wide No Further Action (NFA) determination associated with a historical release of tetrachloroethene (PCE) at the Former Cleaning Center of Redmond at 15796 Redmond Way in Redmond, Washington. The Former Cleaning Center of Redmond is part of a commercial property (Tax Parcel No. 719890-0080) northwest of the intersection of 160th Avenue Northeast and Redmond Way (herein referred to as the Property) (Figure 1). The site associated with the Former Cleaning Center of Redmond goes and Redmond Way (herein referred to as the Property) (Figure 1). The site associated with the former dry cleaning facility and the groundwater plume area extending off the Property to the northwest, where PCE concentrations previously exceeded the applicable Washington State Model Toxics Control Act Cleanup Regulation (MTCA) cleanup level for groundwater (herein referred to as the Site) (Figure 2). PCE is the only constituent of concern (COC) for the Site.

A cleanup action by soil vapor extraction (SVE) was previously completed under Ecology Voluntary Cleanup Program (VCP) Identification No. NW1324 (the original VCP number), resulting in a Property-specific NFA determination from Ecology on April 1, 2011. The objective



of this Technical Memorandum is to provide Ecology with supplemental information regarding potential future risk to human health and the environment throughout the Site posed by residual concentrations of PCE in groundwater.

Farallon previously prepared and submitted the following documents to Ecology on behalf of Nelgroup Properties LLC with a request for an NFA determination for the entire Site under VCP Identification No. NW3166 (the current VCP number):

- Site Closure Report Addendum, Former Cleaning Center of Redmond, 15796 Redmond Way, Redmond, Washington dated April 26, 2017, prepared by Farallon for Nelgroup Properties LLC (Site Closure Addendum) (provided in Attachment A); and
- Letter Regarding Response to Request for Additional Information, Former Cleaning Center of Redmond, 15796 Redmond Way, Redmond, Washington dated May 23, 2018 from Ms. Jennifer L. Moore and Mr. Brani Jurista of Farallon to Ms. Sonia Fernandez of Ecology (Additional Information Letter) (provided in Attachment B).

Farallon and Mr. Thomas Markl of Nelgroup Properties L.L.C. met with representatives of Ecology on July 25, 2018, at which time the Ecology representatives provided feedback on the Site Closure Addendum and the Additional Information Letter, and identified needed supplemental information, which is provided in this Technical Memorandum. A follow-up meeting between Farallon and Ecology was held on October 15, 2018 to further discuss the content to be included in this Technical Memorandum. During the July and October 2018 meetings and in subsequent email communications, Ecology requested the following supplemental information:

- Redefined list of media of concern for the Site;
- Redefined list of cleanup levels established under MTCA for the Site; and
- Empirical demonstration that PCE concentrations remaining in soil and groundwater at the Site will not result in future exceedances of the groundwater cleanup levels established for the Site under MTCA.

The following sections provide the supplemental information requested by Ecology prior to issuance of a Site-wide NFA determination.

MEDIA OF CONCERN

The media of concern defined for the Site under the original VCP number that were documented in the April 1, 2011 Property-specific NFA determination¹ were soil, groundwater, and indoor air. Although the PCE plume in groundwater extended northwest toward the Sammamish River, the PCE concentrations detected in groundwater at monitoring well MW-8, located within

¹ Letter Regarding No Further Action at a Property Associated with a Site: Cleaning Center of Redmond – 15796 Redmond Way, Redmond, WA 98052 from Mr. Michael Kuntz of Ecology to Mr. Markl of Nelson Real Estate Management, L.L.C.

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approximately 80 feet of the river, were low and remained relatively stable. Based on these data, Ecology indicated that surface water was not a potential medium of concern.

Operation of the SVE system between 2003 and 2006 resulted in a significant reduction of the PCE mass in soil, which was affecting groundwater and posing a risk to indoor air quality. PCE concentrations detected at the Property were less than the cleanup levels for soil, groundwater, and indoor air, which resulted in the issuance of the Property-specific NFA determination by Ecology in 2011. However, Ecology cited a need to eliminate future risk to human health and the environment posed by residual PCE in groundwater. Confirmation that PCE concentrations in groundwater will remain less than the established cleanup level, accomplished via groundwater modeling, is required to obtain a Site-wide NFA determination.

CLEANUP LEVELS

The following cleanup levels were established for the Site under the original VCP number and are documented in the April 1, 2011 Property-specific NFA determination letter.¹ Farallon and Ecology agreed to retain these cleanup levels under the current VCP number per Sections 702(12)(b) and 702(12)(c) of Chapter 173-340 of the Washington Administrative Code. PCE is the only COC for the Site, because it is the only constituent to have historically exceeded cleanup levels for the media of concern established for the Site. The cleanup levels established for PCE are presented below by medium of concern:

- **Soil:** The standard MTCA Method A cleanup level of 0.05 milligram per kilogram for protection of drinking water, indoor air, and unrestricted land use.
- **Groundwater:** The standard MTCA Method A cleanup level of 5 micrograms per liter (µg/l) for protection of drinking water.
- **Indoor air:** A modified Method B cleanup level of 4.27 micrograms per cubic meter for protection of commercial workers.

EMPIRICAL DEMONSTRATION AND GROUNDWATER MODELING

The source area for the PCE release at the Property was remediated from 2003 to 2006 through the use of an SVE system. Confirmation soil sampling conducted in the source area in June 2007 indicated that the cleanup level for PCE was achieved throughout the Property (Table 1). Four quarters of confirmation groundwater sampling was conducted at monitoring wells MW-1 through MW-3, MW-5 through MW-7, and MW-9 between 2006 and 2007 (Figure 2). Groundwater monitoring at monitoring well MW-8, located east of the Sammamish River, had been discontinued after the August 2004 sampling event due to COC concentrations consistently being below the cleanup level established for the Site (Table 2). The results from confirmation groundwater sampling indicated that PCE concentrations consistently were less than the MTCA Method A cleanup level. Low concentrations of PCE persisted, but were expected to attenuate. Ecology concurred that the residual PCE concentrations in soil and groundwater no longer posed a risk to human health or the environment, and issued the NFA determination for the Property.



During recent discussions between Farallon and Ecology regarding issuance of a Site-wide NFA determination, Ecology requested that groundwater modeling be conducted to demonstrate that residual PCE in soil and groundwater does not pose a potential future risk to human health or the environment throughout the Site. With approval from the Ecology Site Manager, Farallon performed groundwater modeling using the U.S. Environmental Protection Agency BIOCHLOR groundwater model, an analytical fate and transport model that simulates 1-dimensional advection, 3-dimensional dispersion, linear adsorption, and reductive dechlorination with or without decay².

Ecology further requested that the model be run based on specific data objectives to demonstrate that PCE concentrations in groundwater will not exceed the groundwater cleanup level throughout the Site in the future. The following sections present the specific data objectives requested by Ecology and the corresponding groundwater model results.

GROUNDWATER MODEL INPUTS

Model inputs were based on field measurements where available, or on literature values if Sitespecific data were unavailable. Key model input parameters are listed in Table 3 and briefly discussed below.

Source Area Concentrations

Various source concentrations for PCE were used in different iterations of the model to address Ecology data objectives. Because PCE degradation products were present at very low or non-detect concentrations in groundwater at the Site, model source area concentrations for trichloroethene, cis-1,2-dichloroethene, and vinyl chloride were set to zero.

Source Type and Simulation Time

The source type can be set to a continuous or a decaying source. An initial calibration with a continuous source was conducted, as described below. Following calibration, a decaying source was assumed in the model because the PCE source area was remediated between 2003 and 2006. The model was run for a period of 20 years for calibration and subsequent evaluation of PCE attenuation to address the first data objective.

Hydraulic Conductivity and Gradient

The hydraulic conductivity value was based on information provided in the *Groundwater Flow Model Development Report, City of Redmond Groundwater Model, Redmond, Washington* dated March 30, 2018 prepared for the City of Redmond by GeoEngineers, Inc. An average hydraulic conductivity of 3,000 feet per day (1.1 centimeter per second) was used for the BIOCHLOR modeling. This hydraulic conductivity value was based on data for City Well No. 4, the City of Redmond water-supply well closest to the Site, approximately 1,500 feet to the north-northwest of the source area. City Well No. 4 is screened in the Redmond alluvial aquifer, which corresponds with the groundwater affected by the release of PCE throughout the Site. A hydraulic gradient of

² <u>https://www.epa.gov/water-research/biochlor-natural-attenuation-decision-support-system.</u>

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0.0023 foot per foot was calculated using the May 2007 groundwater elevation data presented on Figure 2.

Biotransformation Rate (Half-Life)

Biotransformation was not incorporated into this modeling effort because PCE degradation was negligible based on the absence of degradation compounds in groundwater. Therefore, biotransformation is not a significant factor that would affect attenuation of PCE throughout the Site.

Dispersion

Longitudinal dispersion was calculated using the Xu and Eckstein method because it provides a more-conservative (lower) dispersion value than using a percentage of plume length. Longitudinal dispersion was estimated based on a plume length of 700 feet, represented by the approximate distance from the source area to the eastern edge of the Sammamish River as shown on Figure 2. The resulting longitudinal dispersion was calculated to be approximately 21.5 feet. Transverse dispersion was set to 2.15 feet, which is 10 percent of the longitudinal dispersion, the rule of thumb specified in the BIOCHLOR user's manual³. Vertical dispersion was set to 1×10^{-99} (negligible) based on the prior evaluation of the vertical distribution of PCE in groundwater, discussed in the Site Closure Addendum.

Model Area Width and Length

The model width was set to 200 feet, a reasonable width for the Site (Figure 2). The model length was set to 700 feet, the approximate distance from the source area to the Sammamish River, and a reasonable length for centerline plume estimates.

Source Area Width and Thickness

The source area width was conservatively specified as 50 feet based on historical soil data and the size of the dry cleaning suite. The source area thickness was specified as 15 feet based on historical soil and groundwater data. The source area thickness is equivalent to the screen length of monitoring well MW-4, and thus represents the upper aquifer thickness, where PCE was present in groundwater. The source area thickness does not affect the modeled results for this Technical Memorandum because the simulation used a centerline plume with negligible vertical dispersion.

Effective Porosity, Soil Bulk Density, and Fraction Organic Carbon

No Site-specific data were available for effective porosity, soil bulk density, or fraction organic carbon. Default literature values provided in BIOCHLOR therefore were used for the modeling effort (Table 3).

³ BIOCHLOR Natural Attenuation Decision Support System, User's Manual, Version 1.0 dated January 2000, prepared by the U.S. Environmental Protection Agency.



Retardation

Adsorption to the soil matrix can reduce the concentration of dissolved contaminants moving through groundwater. The retardation factor is the ratio of the groundwater seepage velocity to the rate of organic chemical migration in groundwater. No Site-specific data were available for soil bulk density, fraction organic carbon, or a partition coefficient (used to calculate retardation). Default literature values provided in BIOCHLOR therefore were used for the modeling effort. The default retardation value of 2.25 was used in the model.

The following sections provide Ecology's recommended data objectives in italicized text, and Farallon's responses based on the results from the groundwater modeling, in Roman text.

GROUNDWATER MODELING 2000 TO PRESENT

Use the 12/20/2000 PCE concentration at monitoring well MW-4 (28 [micrograms per liter] ug/L) as the source strength. Check model concentrations with time at downgradient MW-8 and compare with MW-8 data.

Using the BIOCHLOR model inputs described above, simulations were performed to provide a rough calibration to observed PCE concentrations since 2000, and to estimate PCE concentrations in groundwater down-gradient of monitoring well MW-4 over time. Centerline plume analysis was performed as a conservative approach to estimate the maximum PCE concentration at the modeled end point. For the initial calibration, a constant source concentration of 28 μ g/l from the time period prior to source removal was simulated at monitoring well MW-4 (Figure 3A) and compared to maximum observed concentrations at down-gradient wells MW-7 and MW-8 for the year 2000 (Figure 3B). As shown on Figure 3B, a reasonable match was obtained at wells MW-7 and MW-8, indicating a good calibration to conditions prior to source removal.

A decaying source was then specified in the model (Figure 4A) to simulate PCE attenuation in groundwater after source removal. Model results (Figure 4B) indicated an acceptable match between simulated and measured PCE concentrations at these locations at an elapsed time of 4 years (representing 2004 conditions). These model results represent the time required, with gradual source removal, for PCE concentrations at the source area and down-gradient of the source area to attenuate to observed conditions.

At a simulation time of 18 years, roughly equivalent to the current 2018 time period assuming a start time of December 2000 (used as the source timing at monitoring well MW-4), the model predicted groundwater PCE concentrations of approximately 0.05 μ g/l at the source area, and approximately 0.02 μ g/l at a distance of 700 feet from the source area, the approximate distance from the source area to the Sammamish River (Figure 4C). These results suggest that PCE concentrations in groundwater have decreased substantially since the SVE cleanup activities concluded in 2007, and that PCE concentrations will continue to decrease over time.

A quick plot of MW-4/MW-9 and MW-8 data will show the MW-4 "peak" likely appeared at MW-8 in 5/10/2004. Provide graphs to show this. Compare the estimated travel time indicated by the time-series plot to travel time predicted by the model.



Farallon used the BIOCHLOR model to estimate the travel time of PCE from the source area at monitoring well MW-4 to the Sammamish River so the effects of dispersion and retardation would be incorporated into the estimate. Using a constant PCE source of $28 \mu g/l$ (Figure 5A), the modeled time period was adjusted until the breakthrough of PCE at $1 \mu g/l$ could be determined in the model output (Figure 5B). A travel time of 0.13 year (47.5 days) was calculated by the model, which represents the time required for PCE to migrate from the source area to the Sammamish River. This travel time is reasonable given the high hydraulic conductivity of the aquifer material in the region. Based on this travel time, any peak concentration that may have passed from monitoring well MW-4 to MW-8 would have occurred between sampling events, and would not have been observed in the quarterly groundwater monitoring data.

GROUNDWATER MODELING 2007 TO PRESENT

Use the 5/15/2007 data to evaluate model predictions through October 2018.

Farallon simulated the likely concentrations of PCE in groundwater in 2018 using the PCE concentrations from the February 28, 2007 groundwater monitoring event in the BIOCHLOR model instead of those from the May 15, 2007 event because the concentration of PCE in down-gradient monitoring well MW-7 was slightly higher than the concentration of PCE in source area monitoring well MW-9 (Table 2), causing technical issues with the simulation using the May 15, 2007 data.

A PCE concentration of 2.4 μ g/l in monitoring well MW-9 was used as a decaying source concentration for the simulation (Figure 6A). A decaying source was used based on the remediation of the source area. According to the BIOCHLOR model, the expected concentration of PCE in groundwater in 2018 (Figure 6B) based on February 28, 2007 PCE concentrations would be:

- 0.05 µg/l at monitoring well MW-9;
- 0.03 µg/l at monitoring well MW-7; and
- $0.019 \mu g/l$ at the Sammamish River.

These concentrations are less than the cleanup level of 5.0 μ g/l that was established for the Site under MTCA and, based on model results, will continue to decrease with time.

GROUNDWATER MODELING FOR MONITORING WELL MW-5

Discuss the presence, fluctuations, and potential source(s) of PCE in cross-gradient/up-gradient monitoring well MW-5 and potential impacts on the Site contaminant plume. Use the model to assess downgradient transport along the flow path of MW-5, MW-1, MW-2 and westward to the Sammamish River through October 2018.

No known confirmed up-gradient source of PCE associated with PCE concentrations at monitoring well MW-5 was identified during previous investigation work conducted by Farallon. However, Farallon recently reviewed a list of other known cleanup sites in the vicinity of the Site using the



What's In My Neighborhood online database provided by the Ecology Toxics Cleanup Program⁴. Farallon identified ARCO Facility No. 6067 (ARCO 6067) as a potential up-gradient source of PCE to the Site. ARCO 6067 was reported to Ecology on June 11, 1991, and has been issued Ecology Cleanup Site ID No. 8752. ARCO 6067 was enrolled in the Ecology VCP and was assigned VCP Identification No. NW2736. Constituents of concern for ARCO 6067 are: total petroleum hydrocarbons as gasoline-, diesel-, and oil-range organics; benzene; toluene; ethylbenzene; xylenes; PCE; carcinogenic polycyclic aromatic hydrocarbons; and polychlorinated biphenyls.

Atlantic Richfield Company requested an NFA determination for ARCO 6067, which was denied by Ecology in a letter dated March 30, 2015.⁵ Ecology cited a lack of vertical and horizontal delineation of PCE impacts in soil, and inadequate assessment of PCE in groundwater as data gaps. ARCO 6067 left the VCP on February 13, 2017 and re-enrolled in the Petroleum Technical Assistance Program under the Petroleum Liability Insurance Agency and was issued Identification No. PNW098. The *Remedial Excavation Work Plan, BP Facility No. 6067, 8009 164th Avenue NE, Redmond, Washington* dated October 19, 2018 prepared by Arcadis U.S., Inc. for Remediation Management Services Company, BP West Coast Products, LLC indicated that ARCO 6067 is slated for demolition, and that existing underground storage tanks will be removed. The area around the former waste-oil underground storage tank where PCE and other contaminant impacts have been confirmed will be overexcavated. The Remedial Excavation Work Plan did not mention conducting additional groundwater monitoring for PCE. ARCO 6067 is a potential up-gradient source of PCE impacting the Site. No other recent facilities were identified in the What's In My Neighborhood database.

Farallon simulated PCE transport from cross- to up-gradient monitoring well MW-5 toward the Sammamish River. A continuous source of 4.8 μ g/l (the maximum PCE concentration detected in this well; Table 2; Figure 2) was first applied at monitoring well MW-5 (Figure 7A) to simulate a worst-case scenario, assuming that PCE concentrations do not attenuate over time along the flow path from monitoring well MW-5 to the Sammamish River. A source length of 700 feet was used as a conservative approach, and to allow direct comparisons to the modeling conducted for monitoring well MW-4. As shown on Figure 7B, PCE concentrations of approximately 1.7 μ g/l were simulated at the down-gradient limit of the model, which is less than the groundwater cleanup level established for the Site under MTCA.

A decaying PCE source concentration of 4.8 μ g/l was then applied to monitoring well MW-5 (Figure 8A). Other model input parameters were unchanged. A calibration was performed to approximate observed PCE concentrations measured in February 2006 at down- to slightly cross-gradient monitoring wells MW-1 and MW-2 (Figure 8B). The model was run for a period of 18 years to estimate down-gradient PCE concentrations over time, and to estimate current (2018) conditions with a decaying source. As shown on Figure 8C, the simulated PCE concentrations were reduced to approximately 0.13 μ g/l at monitoring well MW-5, and to

⁴ https://fortress.wa.gov/ecy/neighborhood/

⁵ Letter regarding Further Action at the following Site: ARCO Station 6067, 8009 164th Avenue NE, Redmond, Washington from Ms. Heather Vick of Ecology to Mr. Charles Carmel of Atlantic Richfield Company.



approximately 0.05 μ g/l at the down-gradient limit of the model. The model results indicate that PCE concentrations at and along the groundwater flow path from monitoring well MW-5 are less than the groundwater cleanup level of 5.0 μ g/l, and do not pose an existing or future risk to human health or the environment.

CONCLUSIONS

Farallon performed several iterations of groundwater modeling using the BIOCHLOR groundwater model to address the data objectives for the Site recommended by Ecology. The results from the groundwater modeling show that PCE concentrations in groundwater will remain less than the groundwater cleanup level established for the Site under MTCA, and will continue to attenuate over time.

Residual PCE concentrations in soil and groundwater throughout the Site are less than the cleanup levels and are not a future risk to human health or the environment. Therefore, Farallon requests that Ecology issue a Site-wide NFA determination for the Former Cleaning Center of Redmond.

Attachments: Figure 1, Site Vicinity Map

- Figure 2, *Groundwater Elevation Contours and PCE Concentrations in Groundwater* Figure 3A, *BIOCHLOR Model Inputs – Continuous Source at MW-4*
- Figure 3B, Simulated PCE Concentration Downgradient of MW-4 With Continuous PCE Source of 28 µg/l, Estimated PCE Concentrations at 18 Years After Release (2018)
- Figure 4A, BIOCHLOR Model Inputs Decaying Source at MW-4
- Figure 4B, Simulated PCE Concentration Downgradient of MW-4 with Decaying PCE Source of 28 µg/l, Calibrated to PCE Concentrations Detected in May 2004 in MW-7 and MW-8
- Figure 4C, Simulated PCE Concentration Downgradient of MW-4 with Decaying PCE Source of 28 µg/l, Estimated PCE Concentrations 18 Years After Release (2018)
- Figure 5A, BIOCHLOR Model Inputs for Travel Time Model Continuous Source at MW-4
- Figure 5B, Simulated Breakthrough of PCE at 1 µg/l Downgradient of MW-4 with Continuous PCE Source of 28 µg/l
- Figure 6A, BIOCHLOR Model Inputs Decaying Source at MW-9 Using 2007 Data
- Figure 6B, Simulated PCE Concentration Downgradient of MW-9 with Decaying PCE Source of 2.4 µg/l, Estimated PCE Concentrations 11 Years After February 2007 Sample Event (2018)
- Figure 7A, BIOCHLOR Model Inputs Continuous Source at MW-5
- Figure 7B, Simulated PCE Concentration Downgradient of MW-5 at 20 Years with Continuous Source
- Figure 8A, BIOCHLOR Model Inputs Decaying Source at MW-5
- Figure 8B, Simulated PCE Concentration Downgradient of MW-5 at 4 Years with Decaying Source



Figure 8C, Simulated PCE Concentration Downgradient of MW-5 at 18 Years (2018) with Decaying Source
Table 1, Summary of Confirmation Soil Analytical Results – HVOCs
Table 2, Summary of Groundwater Analytical Results – HVOCs
Table 3, Fate and Transport Modeling Input Parameters for BIOCHLOR Groundwater Model
Attachment A, Site Closure Addendum
Attachment B, Additional Information Letter

JLM/NDC/BJ:bjj

FIGURES

REQUEST FOR SITE-WIDE NO FURTHER ACTION DETERMINATION Cleaning Center of Redmond 15796 Redmond Way Redmond, Washington

Farallon PN: 650-001





Figure 3A BIOCHLOR Model Inputs - Continuous Source at MW-4 Former Cleaning Center of Redmond Redmond, Washington Farallon PN: 650-001



Figure 3B Simulated PCE Concentration Downgradient of MW-4 With Continuous PCE Source of 28 ug/L Estimated PCE Concentrations at 18 Years After Release (2018) Former Cleaning Center of Redmond Redmond, Washington Farallon PN: 650-001



Figure 4A BIOCHLOR Model Inputs - Decaying Source at MW-4 Former Cleaning Center of Redmond Redmond, Washington Farallon PN: 650-001



Figure 4B Simulated PCE Concentration Downgradient of MW-4 With Decaying PCE Source of 28 ug/L Calibrated to PCE Concentrations Detected in May 2004 in MW-7 and MW-8 Former Cleaning Center of Redmond Redmond, Washington Farallon PN: 650-001



Figure 4C Simulated PCE Concentration Downgradient of MW-4 With Decaying PCE Source of 28 ug/L Estimated PCE Concentrations 18 Years After Release (2018) Former Cleaning Center of Redmond Redmond, Washington Farallon PN: 650-001





Figure 5A BIOCHLOR Model Inputs for Travel Time Model - Continuous Source at MW-4 Former Cleaning Center of Redmond Redmond, Washington Farallon PN: 650-001



Figure 5B Simulated Breakthrough of PCE at 1 ug/L Downgradient of MW-4 with Continuous PCE Source of 28 ug/L Former Cleaning Center of Redmond Redmond, Washington Farallon PN: 650-001



Figure 6A BIOCHLOR Model Inputs - Decaying Source at MW-9 Using 2007 Data Former Cleaning Center of Redmond Redmond, Washington Farallon PN: 650-001



Figure 6B Simulated PCE Concentration Downgradient of MW-9 With Decaying PCE Source of 2.4 ug/L Estimated PCE Concentrations 11 Years After February 2007 Sample Event (2018) Former Cleaning Center of Redmond Redmond, Washington Farallon PN: 650-001



Figure 7A BIOCHLOR Model Inputs - Continuous Source at MW-5 Former Cleaning Center of Redmond Redmond, Washington Farallon PN: 650-001



Figure 7B Simulated PCE Concentration Downgradient of MW-5 at 20 Years with Continuous Source Former Cleaning Center of Redmond Redmond, Washington Farallon PN: 650-001



Figure 8A BIOCHLOR Model Inputs - Decaying Source at MW-5 Former Cleaning Center of Redmond Redmond, Washington Farallon PN: 650-001



Figure 8B Simulated PCE Concentration Downgradient of MW-5 at 4 Years with Decaying Source Former Cleaning Center of Redmond Redmond, Washington Farallon PN: 650-001



Figure 8C Simulated PCE Concentration Downgradient of MW-5 at 18 Years (2018) with Decaying Source Former Cleaning Center of Redmond Redmond, Washington Farallon PN: 650-001



TABLES

REQUEST FOR SITE-WIDE NO FURTHER ACTION DETERMINATION Cleaning Center of Redmond 15796 Redmond Way Redmond, Washington

Farallon PN: 650-001

Table 1 Summary of Confirmation Soil Analytical Results - HVOCs Former Cleaning Center of Redmond Redmond, Washington Farallon PN: 650-001

				Analytical Results (milligrams per kilogram)			
Boring ID	Sample Number	Date Sampled	Sample Depth (feet) ¹	PCE ²	TCE ²	cis-1,2- Dichloroethene ²	trans-1,2- Dichloroethene ²
	FB1-1	6/1/2007	1	0.0043	< 0.0012	< 0.0012	< 0.0012
FB1	FB1-6	6/1/2007	6	0.0021	< 0.0013	< 0.0013	< 0.0013
	FB1-10	6/1/2007	10	0.0021	< 0.0013	< 0.0013	< 0.0013
FB2	FB2-1	6/1/2007	1	0.0059	< 0.0011	< 0.0011	< 0.0011
	FB3-1	6/12/2007	1	0.002	<0.00091	<0.00091	<0.00091
FB3	FB3-6	6/12/2007	6	0.0054	< 0.0014	0.043	0.0028
	FB3-9	6/12/2007	9	0.02	< 0.0010	0.0017	< 0.0010
	FB4-0.5	6/12/2007	0.5	0.0041	< 0.0010	< 0.0010	< 0.0010
FB4	FB4-5	6/12/2007	5	0.0061	< 0.00096	<0.00096	<0.00096
	FB4-9	6/12/2007	9	0.0026	< 0.0013	< 0.0013	< 0.0013
FB5	FB5-0.5	6/12/2007	0.5	< 0.00099	< 0.00099	<0.00099	<0.00099
	FB5-3	6/12/2007	3	0.021	< 0.00081	< 0.00081	< 0.00081
	FB5-5	6/12/2007	5	0.018	< 0.00094	< 0.00094	< 0.00094
MW10	MW10-11	6/20/2007	11	< 0.00093	<0.00093	<0.00093	<0.00093
MTCA Cleanup Levels for Soil				0.05 ³	0.03 ³	800 ³	1,600³

NOTES:

< denotes concentration is less than the laboratory practical quantitation limit indicated.

¹Depth in feet below ground surface.

²Analyzed by U.S. Environmental Protection Agency Method 8260B.

³Cleanup levels established for site closure in the Site Closure Report, Cleaning Center of Redmond, 15796 Redmond Way, Redmond, Washington dated September 21, 2007 prepared by Farallon Consulting, L.L.C. for Nelson Real Estate

Management LLC.

HVOCs = halogenated volatile organic compounds

PCE = tetrachloroethene

TCE = trichloroethene

Table 2Summary of Groundwater Analytical Results - HVOCsFormer Cleaning Center of RedmondRedmond, WashingtonFarallon PN: 650-001

			Analytical Results (micrograms per liter) ¹			
Well/Sample		Sample Collected				
Identification	Date Sampled	By	Tetrachloroethene	Trichloroethene	cis-1,2-Dichloroethene	Vinyl Chloride
	3/6/2000	GeoEngineers	1.6	<1.0	<5.0	<5.0
	8/8/2000	GeoEngineers	5.4	<1.0	<5.0	<5.0
	12/20/2000	Farallon	2.7	< 0.20	< 0.20	<0.20
	6/6/2001	Farallon	1.3	<0.20	<0.20	<0.20
	6/28/2002	Farallon	2.1	< 0.20	< 0.20	<0.20
	8/13/2003	Farallon	1.2	< 0.20	< 0.20	<0.20
	11/12/2003	Farallon	3.3	0.22	< 0.20	<0.20
MW-1	2/18/2004	Farallon	2.9	<0.20	<0.20	<0.20
	5/10/2004	Farallon	4	< 0.20	< 0.20	<0.20
	8/27/2004	Farallon	8.5	0.84	1.2	0.76
	2/15/2006	Farallon	2.4	<0.20	<0.20	<0.20
	8/23/2006	Farallon	3.3	<0.20	<0.20	<0.20
	11/21/2006	Farallon	4.5	0.26	<0.20	<0.20
	2/28/2007	Farallon	2.3	<0.20	<0.20	<0.20
	5/15/2007	Farallon	3.3	<0.20	<0.20	<0.20
	3/6/2000	GeoEngineers	<1.0	<1.0	<5.0	<5.0
	8/8/2000	GeoEngineers	2.9	<1.0	<5.0	<5.0
	12/20/2000	Farallon	2.9	< 0.20	< 0.20	< 0.20
	6/6/2001	Farallon	1.9	< 0.20	< 0.20	< 0.20
	6/28/2002	Farallon	0.81	< 0.20	< 0.20	< 0.20
	8/13/2003	Farallon	0.99	< 0.20	< 0.20	<0.20
	11/12/2003	Farallon	0.66	< 0.20	< 0.20	<0.20
MW-2	2/18/2004	Farallon	0.88	< 0.20	< 0.20	< 0.20
	5/10/2004	Farallon	0.54	< 0.20	< 0.20	< 0.20
	8/27/2004	Farallon	0.56	< 0.20	< 0.20	< 0.20
	2/15/2006	Farallon	1.1	< 0.20	< 0.20	< 0.20
	8/23/2006	Farallon	1	< 0.20	< 0.20	< 0.20
	11/21/2006	Farallon	1.1	< 0.20	< 0.20	< 0.20
	2/28/2007	Farallon	0.83	<0.20	< 0.20	< 0.20
	5/15/2007	Farallon	1.3	< 0.20	< 0.20	< 0.20
	3/6/2000	GeoEngineers	<1.0	<1.0	<5.0	<5.0
	8/8/2000	GeoEngineers	<1.0	<1.0	<5.0	<5.0
	12/20/2000	Farallon	0.34	<0.20	<0.20	< 0.20
	6/6/2001	Farallon	2	<0.20	< 0.20	<0.20
	6/28/2002	Farallon	2	<0.20	<0.20	< 0.20
	8/13/2003	Farallon	7.3	<0.20	0.49	< 0.20
	11/12/2003	Farallon	4.5	0.21	< 0.20	< 0.20
MW-3	2/18/2004	Farallon	2.8	<0.20	<0.20	< 0.20
	5/10/2004	Farallon	3.5	<0.20	<0.20	<0.20
	8/27/2004	Farallon	6.7	0.45	0.24	<0.20
	2/15/2006	Farallon	2.1	<0.20	< 0.20	<0.20
	8/23/2006	Farallon	2.5	<0.20	<0.20	<0.20
	11/21/2006	Farallon	5	0.21	<0.20	<0.20
	2/28/2007	Farallon	1.8	< 0.20	< 0.20	< 0.20
	5/15/2007	Farallon	2.5	< 0.20	<0.20	< 0.20
	3/6/2000	GeoEngineers	50	<1.0	<5.0	<5.0
	8/8/2000	GeoEngineers	9.2	<1.0	<5.0	<5.0
	12/20/2000	Farallon	28	0.43	0.78	<0.20
MW-4	6/6/2001	Farallon	16	0.32	0.80	< 0.20
	6/28/2002	Farallon	14	0.5	1.50	<0.20
			Well	Removed 2003	1	
MTCA Cleanup Lev	els for Groundwate	er	5.0 ²	5.0 ²	80 ²	0.2 ²

Table 2Summary of Groundwater Analytical Results - HVOCsFormer Cleaning Center of RedmondRedmond, WashingtonFarallon PN: 650-001

			Analytical Results (micrograms per liter) ¹			
Well/Sample		Sample Collected				
Identification	Date Sampled	By	Tetrachloroethene	Trichloroethene	cis-1,2-Dichloroethene	Vinyl Chloride
	3/6/2000	GeoEngineers	<1.0	<1.0	<5.0	<5.0
	8/8/2000	GeoEngineers	<1.0	<1.0	<5.0	<5.0
	12/20/2000	Farallon	2	<0.20	<0.20	<0.20
	6/6/2001	Farallon	1.7	<0.20	<0.20	<0.20
	6/28/2002	Farallon	1.6	<0.20	<0.20	<0.20
MW-5	8/13/2003	Farallon	0.24	<0.20	<0.20	<0.20
	11/12/2003	Farallon	3.6	<0.20	<0.20	<0.20
	2/18/2004	Farallon	4.8	<0.20	<0.20	<0.20
	5/10/2004	Farallon	1.6	<0.20	<0.20	<0.20
	8/27/2004	Farallon	1.4	<0.20	<0.20	<0.20
	2/15/2006	Farallon	4.8	<0.20	<0.20	<0.20
	8/23/2006	Farallon	1	<0.20	<0.20	<0.20
	3/6/2000	GeoEngineers	11	<1.0	<5.0	<5.0
	8/8/2000	GeoEngineers	27	<1.0	<5.0	<5.0
MW-6	12/20/2000	Farallon	15	0.24	<0.20	<0.20
	6/6/2001	Farallon	8.6	<0.20	<0.20	<0.20
	6/28/2002	Farallon	6.3	<0.20	0.29	<0.20
		1	Well	Removed 2003		
	3/28/2000	GeoEngineers	15	3	<5.0	<5.0
	8/8/2000	GeoEngineers	14	<1.0	<5.0	<5.0
	12/21/2000	Farallon	12	<0.20	<0.20	<0.20
	6/6/2001	Farallon	7.6	<0.20	<0.20	<0.20
	6/28/2002	Farallon	3.9	<0.20	<0.20	<0.20
	8/13/2003	Farallon	5.3	<0.20	<0.20	<0.20
	11/12/2003	Farallon	4.5	<0.20	<0.20	<0.20
MW-7	2/18/2004	Farallon	3.6	<0.20	<0.20	<0.20
	5/10/2004	Farallon	3.3	<0.20	<0.20	<0.20
	8/30/2004	Farallon	3.6	<0.20	<0.20	<0.20
	2/15/2006	Farallon	2.5	<0.20	<0.20	<0.20
	8/23/2006	Farallon	2.3	<0.20	<0.20	<0.20
	11/21/2006	Farallon	2.2	<0.20	<0.20	<0.20
	2/28/2007	Farallon	2.1	<0.20	<0.20	<0.20
	5/15/2007	Farallon	2.9	<0.20	<0.20	<0.20
	4/14/2000	GeoEngineers	7.4	<1.0	<5.0	<5.0
	8/8/2000	GeoEngineers	8.5	<1.0	<5.0	<5.0
	12/20/2000	Farallon	5.7	0.33	0.48	<0.20
	6/6/2001	Farallon	3.9	0.23	0.36	<0.20
MW-8	6/28/2002	Farallon	4.1	0.29	0.46	<0.20
	8/13/2003	Farallon	3.4	0.26	0.46	<0.20
	11/12/2003	Farallon	0.62	<0.20	<0.20	<0.20
	2/18/2004	Farallon	0.3	<0.20	<0.20	<0.20
	5/10/2004	Farallon	2.8	0.25	0.37	<0.20
	8/27/2004	Farallon	0.43	<0.20	<0.20	<0.20
MW-9	8/13/2003	Farallon	7.4	0.27	0.42	<0.20
	11/12/2003	Farallon	3.7	<0.20	<0.20	<0.20
	2/18/2004	Farallon	2.9	<0.20	<0.20	<0.20
	5/10/2004	Farallon	2.5	<0.20	<0.20	<0.20
	8/27/2004	Farallon	3	<0.20	<0.20	<0.20
	2/15/2006	Farallon	2.5	<0.20	<0.20	<0.20
	8/23/2006	Farallon	1.6	<0.20	<0.20	<0.20
	11/21/2006	Farallon	2.1	<0.20	<0.20	<0.20
	2/28/2007	Farallon	2.4	<0.20	<0.20	<0.20
	5/15/2007	Farallon	1.8	<0.20	<0.20	<0.20
MTCA Cleanup Levels for Groundwater			5.0 ²	5.0 ²	80 ²	0.2 ²

2 of 3

Table 2 Summary of Groundwater Analytical Results - HVOCs Former Cleaning Center of Redmond Redmond, Washington Farallon PN: 650-001

			Analytical Results (micrograms per liter) ¹				
Well/Sample Identification	Date Sampled	Sample Collected By	Tetrachloroethene	Trichloroethene	cis-1,2-Dichloroethene	Vinyl Chloride	
Reconnaissance Groundwater Samples							
FB-1-GW-12.5	8/21/2006	Farallon	2.4	< 0.20	< 0.20	< 0.20	
FB-1-GW-31.5	8/21/2006	Farallon	0.95	< 0.20	< 0.20	< 0.20	
FB-1-GW-68.5	8/21/2006	Farallon	<0.20	<0.20	<0.20	< 0.20	
MTCA Cleanup Levels for Groundwater			5.0 ²	5.0 ²	80 ²	0.2 2	

NOTES:

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

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

Shaded cells represent analytical results that are believed to be the result of a sampling error due to their lack of

correspondence to other samples from the monitoring well. ¹ Analyzed by U.S. Environmental Protection Agency Method 8260B.

²Cleanup levels established for site closure in the Site Closure Report, Cleaning Center of Redmond, 15796 Redmond Way, Redmond, Washington

September 21, 2007 prepared by Farallon Consulting, L.L.C. for Nelson Real Estate Management LLC.

Farallon = Farallon Consulting, L.L.C. GeoEngineers = GeoEngineers, Inc.

Table 3 Fate and Transport Modeling Input Parameters for BIOCHLOR Groundwater Model **Former Cleaning Center of Redmond Redmond**, Washington Farallon PN: 650-001

Model Input Parameter	Unit	Model Input Value	Data Source
Source Area Concentrations ¹		-	
PCE	µg/l	28	PCE concentration at well MW-4 on 12/20/2000 per Ecology instructions.
TCE	µg/l	0	Low to non-detected concentrations of daughter products at Site.
cis-1,2 DCE	µg/l	0	Low to non-detected concentrations of daughter products at Site.
Vinyl chloride	µg/l	0	Low to non-detected concentrations of daughter products at Site.
Source Type	NA	Decaying	Decaying source based on prior removal of soil source area, and substrate injection. Continuous source used for some simulations
Source Decay Rate (K _s)	1/year	0.2 to 0.35	Based on prior source removal and calibration.
Simulation Time	years	20	Variable simulation time specified to assess long-term future conditions.
		0.0023	Calculated from groundwater elevations and contours presented on Figure 2 of
Hydraulic Gradient	foot/foot		the Site Closure Report Addendum dated April 26, 2017. ¹
			Average hydraulic conductivity based on data from vicinity of Well No. 4 from
Hydraulic Conductivity	cm/s	1.1	the Groundwater Flow Model Development Report dated March 30, 2018, ²
			equivalent to 3,000 feet/day.
Biotransformation Rates (Half-Life)			
	vears		Did not include biodegradation; little degradation reported based on Site-
PCE	5		specific concentrations.
TCE	years		Did not include biodegradation; little degradation reported based on Site-
ICE			Did not include biodegradation: little degradation reported based on Site-
cis-1.2 DCE	years		specific concentrations.
			Did not include biodegradation; little degradation reported based on Site-
Vinyl chloride	years		specific concentrations.
Dispersion			
Longitudinal (g)	faat	21.5	Xu and Eckstein method; based on plume length of 700 feet as measured from
	leet	21.5	Figure 2 of the Site Closure Report Addendum. ¹
Transverse (α_y)	feet	2.15	$(\alpha_{\rm x}) * 0.1$
Vertical (α_z)			No vertical dispersion.
Plume length for estimation	feet	700	
Course Area Dimensione			Plume length of 700 feet based on Figure 2 of the Site Closure Addendum.
Source Area Dimensions			
Width	feet	50	Assumed to extend across width of former building at the source area.
TT : L	C .	15	Assumed to extend through upper portion of shallow aquifer; equal to screen
Height	Teet	15	length of monitoring well MW-4.
Effective Porosity	unitless	0.3	Assumed value for high-conductivity aquifer material.
Soil Bulk Density	kg/l	1.6	Default value in BIOCHLOR Users Manual. ³
Fraction Organic Carbon	percent	0.0018	Default value in BIOCHLOR Users Manual. ³
Retardation Value	unitless	2.25	Default value in BIOCHLOR Users Manual. ³
K _{oc}			
PCE	l/kg	426	Default value in BIOCHLOR Users Manual. ³
TCE	l/kg	130	Default value in BIOCHLOR Users Manual. ³
cis-1,2 DCE	l/kg	125	Default value in BIOCHLOR Users Manual. ³
Vinyl chloride	l/kg	30	Default value in BIOCHLOR Users Manual. ³

NOTES:

Modeling performed using U.S. Environmental Protection Agency BIOCHLOR model.

¹Site Closure Report Addendum, Former Cleaning Center of Redmond, 15796 Redmond Way, Redmond, Washington dated April 26, 2017, prepared by Farallon for Nelgroup Properties LLC. ²Groundwater Flow Model Development Report, City of Redmond Groundwater Model, Redmond,

Washington dated March 30, 2018 prepared by GeoEngineers, Inc. for the City of Redmond.

³BIOCHLOR Natural Attenuation Decision Support System, User's Manual, Version 1.0 dated January 2000, µg/l = micrograms per liter prepared by the U.S. Environmental Protection Agency.

cis-1,2 DCE = cis-1,2-dichloroethene

cm/s = centimeters per second

kg/l = kilograms per liter

- Koc = organic carbon-water partition coefficient
- l/kg = liters per kilogram
- NA = not applicable
- PCE = tetrachloroethene
- TCE = trichloroethene

1 of 1

ATTACHMENT A SITE CLOSURE ADDENDUM

REQUEST FOR SITE-WIDE NO FURTHER ACTION DETERMINATION Cleaning Center of Redmond 15796 Redmond Way Redmond, Washington

Farallon PN: 650-001



Washington Issaquah | Bellingham | Seattle

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Oakland | Sacramento | Irvine

SITE CLOSURE REPORT ADDENDUM

FORMER CLEANING CENTER OF REDMOND 15796 REDMOND WAY REDMOND, WASHINGTON

Submitted by: Farallon Consulting, L.L.C. 975 5th Avenue Northwest Issaquah, Washington 98027

Farallon PN: 650-001

For: Nelgroup Properties LLC 16508 Northeast 79th Street Redmond, Washington 98052

April 26, 2017

Prepared by:



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TABLE OF CONTENTS

1.0	INT	RODUCTION	1-1
	1.1	PROPERTY AND SITE SUMMARY	1-1
	1.2	REPORT ORGANIZATION	1-2
2.0	BAC	KGROUND	2-1
	2.1	PROPERTY AND SITE DESCRIPTION	2-1
	2.2	GEOLOGY AND HYDROGEOLOGY	2-1
	2.3	PREVIOUS INVESTIGATIONS AND CLEANUP ACTION	2-2
	2.4	REGULATORY STATUS	2-4
3.0	TEC	HNICAL COMPONENTS OF CLEANUP ACTION	3-1
4.0	CON	CLUSIONS AND REQUEST FOR NFA DETERMINATION	4-1
5.0	REF	ERENCES	5-1
6.0	LIM	ITATIONS	6-1
	6.1	GENERAL LIMITATIONS	6-1
	6.2	LIMITATION ON RELIANCE BY THIRD PARTIES	6-1

FIGURES

Figure 1	Site Vicinity Map
Figure 2	Groundwater Elevation Contours and PCE Concentrations in Groundwater
Figure 3	Former Cleaning Center of Redmond Site and Nearby Sites
Figure 4	Cross-Section A-A'

TABLES

- Table 1
 Summary of Groundwater Elevations
- Table 2
 Summary of Groundwater Sample Analytical Results PCE

APPENDICES

- Appendix A NFA Determination Letters
- Appendix B Site Closure Report
- Appendix C Washington State Department of Ecology Memorandum
- Appendix D Concentration vs. Time Charts for PCE in Groundwater



ACRONYMS AND ABBREVIATIONS

bgs	below ground surface				
Closure Report	Site Closure Report, Cleaning Center of Redmond, 15796 Redmond Way, Redmond, Washington dated September 21, 2007, prepared by Farallon				
CPOC	conditional point of compliance				
Ecology	Washington State Department of Ecology				
Ecology Memorandum	Implementation Memorandum No. 16, Developing Conditional Points of Compliance at MTCA Sites Where Groundwater Discharges to Surface Water dated December 2016, prepared by Ecology				
Farallon	Farallon Consulting, L.L.C.				
μg/l	micrograms per liter				
MTCA	Washington State Model Toxics Control Act Cleanup Regulation				
NFA determination	No Further Action determination				
PCE	tetrachloroethene				
Property	Former Cleaning Center of Redmond facility at 15796 Redmond Way in Redmond, Washington				
Site	source area proximate to the former dry cleaning machine and an area extending off of the Property to the northwest where PCE concentrations exceeded the applicable MTCA cleanup level for groundwater				
SVE	soil vapor extraction				
VCP	Voluntary Cleanup Program				
WAC	Washington Administrative Code				

in the



1.0 INTRODUCTION

Farallon Consulting, L.L.C. (Farallon) has prepared this Site Closure Report Addendum to summarize supplemental information pertaining to the cleanup action and confirmational monitoring at the Former Cleaning Center of Redmond facility located at 15796 Redmond Way in Redmond, Washington (herein referred to as the Property) (Figure 1). The objectives of this Site Closure Report Addendum are to provide supporting information in the context of the recently published *Implementation Memorandum No. 16, Developing Conditional Points of Compliance at MTCA Sites Where Groundwater Discharges to Surface Water* dated December 2016, prepared by the Washington State Department of Ecology (Ecology) (2016b) (Ecology Memorandum) and provided in Appendix C; and to demonstrate to Ecology that a site-wide No Further Action (NFA) determination rather than the Property-specific NFA determination is warranted.

The cleanup action by soil vapor extraction (SVE) was previously completed in accordance with the Washington State Model Toxics Control Act Cleanup Regulation (MTCA), as established in Chapter 173-340 of the Washington Administrative Code (WAC 173-340), resulting in a Property-specific NFA determination by Ecology on April 1, 2011 (Appendix A). Information pertaining to the cleanup action completion was provided to Ecology in detail in the *Site Closure Report*, *Cleaning Center of Redmond, 15796 Redmond Way, Redmond, Washington* dated September 21, 2007, prepared by Farallon (2007) (Closure Report) (Appendix B), under Ecology Voluntary Cleanup Program (VCP) Identification No. NW1324.

1.1 PROPERTY AND SITE SUMMARY

A release of the dry cleaning solvent tetrachloroethene (PCE) was confirmed at the Property in 1999, and an SVE remediation system was installed in 2003 to address concentrations of PCE in soil and groundwater. PCE was identified as the constituent of concern for the site. A "site," as defined by MTCA, consists of all areas where the constituents of concern have come to be located at concentrations exceeding applicable cleanup levels established under MTCA. The site associated with the Former Cleaning Center of Redmond consists of the source area proximate to the former dry cleaning facility and an area extending off the Property to the northwest, where PCE concentrations exceeded the applicable MTCA cleanup level for groundwater (herein referred to as the Site) (Figure 2). Performance and confirmational groundwater monitoring data collected at the Site between 2003 and 2007 demonstrated that the SVE remediation system was effective in cleaning up PCE in soil and groundwater, and the prior release of PCE at the Site no longer represented a threat to human health or the environment.

Ecology (2011) reviewed the information provided in the Closure Report and issued a Propertyspecific NFA determination for an area that did not include the portion of the Site off the Property to the northwest (Appendix A). This area was affected by concentrations of PCE exceeding the MTCA Method A cleanup level in groundwater prior to being remediated by the SVE remediation system. Farallon understands that Ecology (2016a) limited the NFA determination to the Property,



rather than the entire Site, due to the lack of a delineation well northwest of former monitoring well MW-8, proximate to the Sammamish River (Figure 2).

The existing Property-specific NFA determination (Ecology 2011) (Appendix A) references the existence of a second MTCA site affecting the southeastern portion of the Property, referenced as Site 2 in the Property-specific NFA determination. The release at Site 2 was caused by a separate and distinct release at the up-gradient Redmond Shopping Square property owned by the City of Redmond (VCP Identification No. NW2415) (Figure 3) that formerly affected the southeastern portion of the Property. The groundwater plume associated with Site 2 was not comingled with the former groundwater plume from the Cleaning Center of Redmond site (VCP Identification No. NW1324), referenced as Site 1 in the Property-specific NFA determination. A cleanup action by excavation in conjunction with redevelopment at Site 2 resulted in Ecology issuing an opinion letter on June 20, 2012 confirming that the cleanup at the City of Redmond property met the requirements of MTCA and no further action was necessary throughout that site (Appendix A).

Based on this information and recommendation by Mr. Michael Kuntz, former Ecology Manager for the Cleaning Center of Redmond site, the owners of the Property enrolled the Property into the VCP in January 2013 to resolve the outstanding issue regarding the portion of the Site 2 plume that formerly affected the southern portion of the Property (Figure 3). A new VCP application was submitted under the site name Nelgroup Properties, LLC and assigned VCP Identification No. NW2693. Confirmational groundwater monitoring conducted between 2010 and 2014 at the Nelgroup Properties, LLC site confirmed that the groundwater plume emanating from the source at Site 2 had been cleaned up and no longer affected the Nelgroup Properties, LLC site VCP confirming that the cleanup met the requirements of MTCA and no further action was necessary throughout that site (Appendix A).

Site 2 and the Nelgroup Properties, LLC site will not be discussed further in this Site Closure Report Addendum, because these sites:

- No longer affect the Property;
- No longer represent a threat to human health or the environment; and
- Are entirely separate from the Site and do not comingle with the Site in any way.

1.2 REPORT ORGANIZATION

This Site Closure Report Addendum summarizes background information and provides context for a request for a Site-wide NFA determination. This report is organized into the following sections:

• Section 1, Introduction, presents an overview and the objective of the Site Closure Report Addendum.



- Section 2, Background, provides a description of the Site features; Site geology and hydrogeology; a summary of previous investigations and the cleanup action; and the regulatory status of the Site.
- Section 3, Technical Components of Cleanup Action, presents a summary of technical elements associated with the cleanup action completed.
- Section 4, Conclusions and Request for NFA Determination, presents Farallon's conclusions and a request for a Site-wide NFA determination.
- Section 5, References, lists the documents cited in this Site Closure Report Addendum.
- Section 7, Limitations, presents Farallon's standard limitations.



2.0 BACKGROUND

The following is a discussion of the background for the Site, including a description of the Property and the Site, the geology and hydrogeology of the Site, a summary of previous investigations and the completed cleanup action, and the regulatory status of the Site.

2.1 PROPERTY AND SITE DESCRIPTION

The Property is located at 15796 Redmond Way in Redmond, Washington and includes three single-story, commercial buildings of masonry construction (Figure 2). According to King County Tax Assessor records, the northern commercial building was constructed in various stages from 1966 through the early 2009 (King County Department of Assessments 2017). Several remodels and additions have occurred since the early 1980s, the most recent of which is a significant expansion near the eastern end of the northern commercial building in 2009. Asphalt-paved parking areas with landscaping strips are north and south of the northern commercial building. The southeastern commercial building is approximately 13,203 square feet in area and was constructed in 2009. The southeastern commercial building is occupied by a bank and restaurants. The south-central commercial building is 0,496 square feet in area and was constructed in 2005. The south-central commercial building is occupied by a coffee shop. The Property is bordered to the west by 158th Avenue South, to the east by 160th Avenue Northeast, and to the south by Redmond Way Northeast. The north-adjacent property is an asphalt-paved parking lot.

The Former Cleaning Center of Redmond in the northern commercial building operated as a dry cleaning facility that used PCE in the dry cleaning process from 1990 until October 29, 2002. The dry cleaning machine that used PCE was replaced with the cleaning machine that uses an environmentally friendly dry cleaning chemical around that time. The current dry cleaning facility operates as a "green" dry cleaning facility or as a dry cleaning drop-off facility.

According to the U.S. Geological Survey (2014) topographic map of Kirkland, Washington dated 2014, the Site is at an elevation of approximately 40 feet above mean sea level and is relatively flat. Regional topography in the vicinity slopes down to the west. The Sammamish River is approximately 600 feet west of the Property. The Site extends northwest toward the Sammamish River from the source area at the Former Cleaning Center of Redmond facility on the Property (Figure 2).

2.2 GEOLOGY AND HYDROGEOLOGY

The Puget Sound region is underlain by Quaternary sediments deposited during glacial episodes (Galster and Laprade 1991). Deposition occurred during a number of glacial advances and retreats, which created the existing subsurface conditions. The regional sediments consist primarily of interlayered and/or sequential deposits of alluvial clays, silts, and sands that typically are situated over deposits of glacial till that consist of silty sand to sandy silt with gravel. Outwash sediments consisting of sands, silts, clays, and gravels were deposited by rivers, streams, and post-glacial



lakes during the glacial retreats. With the exception of the most recent recessional deposits, the outwash sediments have been over-consolidated by the overriding ice sheets.

Shallow soil encountered during Farallon's subsurface investigation activities in the vicinity of the Site consisted primarily of sand and gravel, with the exception of soil encountered northwest of the northern commercial building. The shallow soil at this location included a layer of silt and peat from approximately 2.5 to 8 feet below ground surface (bgs). Underlying the silt and peat was sand and gravel consistent with the other boring locations.

The shallow aquifer is unconfined and extends to a minimum depth of 70 feet bgs at the Site, based on Farallon's deep boring assessment conducted in August 2006. Groundwater levels measured at the Site on May 15, 2007 ranged from 9.62 to 11.99 feet below the top of the well casings. During the 13 monitoring events conducted by Farallon since 2000, the estimated groundwater flow direction consistently has been to the northwest toward the Sammamish River, similar to the estimated groundwater flow direction depicted on Figures 2 and 3. Groundwater elevations calculated from the monitoring well gauging data indicate that the potentiometric surface of the unconfined aquifer is at a similar elevation as the surface of the Sammamish River, suggesting that they are hydrologically connected (Figure 4).

2.3 PREVIOUS INVESTIGATIONS AND CLEANUP ACTION

Alisto Engineering Group (1999) performed fieldwork at the Site in 1999 to assess whether a release of PCE from operations at the Former Cleaning Center of Redmond facility may have occurred. The assessment involved drilling four borings in the vicinity of the Former Cleaning Center of Redmond dry cleaning machine to collect soil samples for laboratory analysis. A reconnaissance groundwater sample also was collected from one of the borings. The results of the assessment indicated that concentrations of PCE in soil and groundwater and concentrations of TCE in groundwater at the Site exceeded the MTCA Method A cleanup levels for soil and groundwater. The presence of PCE and TCE was attributed to releases from dry cleaning operations at the Former Cleaning Center of Redmond facility.

GeoEngineers, Inc. (2001) conducted a Phase II Environmental Site Assessment at the Site in 2000 to further delineate the vertical and lateral extent of PCE exceeding the MTCA Method A cleanup levels in soil and groundwater. The Phase II Environmental Site Assessment involved drilling 11 borings to collect soil and reconnaissance groundwater samples, and installing monitoring wells MW-1 through MW-8. PCE was detected at concentrations exceeding 0.5 milligrams per kilogram in soil samples collected from two borings south and east of the Former Cleaning Center of Redmond dry cleaning machine. The data provided in the Phase II Environmental Site Assessment (GeoEngineers, Inc. 2001) bounded the distribution of PCE in groundwater to the north-northeast, south, and west.

Farallon began monitoring groundwater conditions at the Site in December 2000 to document the trend of PCE concentrations over time, and to assess whether concentrations of PCE would decrease to less than MTCA Method A cleanup levels through natural attenuation within a

2 - 2



reasonable restoration time frame (Tables 1 and 2). In 2003, monitoring wells MW-4 and MW-6 were decommissioned due to expansion of the northern commercial building, and monitoring well MW-9 was installed proximate to the confirmed PCE source to replace monitoring well MW-4. Farallon conducted a total of 13 groundwater monitoring events between December 2000 and May 2007.

Farallon installed an SVE well through the concrete slab inside the Former Cleaning Center of Redmond in August 2003. The SVE well was installed to facilitate operation of an SVE system to remove concentrations of PCE in soil at the source area proximate to the former location of the dry cleaning machine. It was anticipated that operation of the SVE system would eliminate or sufficiently decrease the flux of PCE from the source in the vadose (unsaturated) zone to groundwater, making active remediation of groundwater contamination unnecessary. Concentrations of PCE in groundwater declined during the 3-year operation of the SVE system, which commenced in August 2003 and ended in August 2006.

Farallon (2006a) conducted an assessment of deep groundwater quality in August 2006 that was performed in response to a letter from Ecology (2006) that stated "the vertical extent of contamination, in particular tetrachloroethene, in groundwater above the cleanup level(s) has not been determined," among other opinions. The assessment of deep groundwater quality included collection of reconnaissance groundwater samples from hollow-stem auger boring FB-1, which was advanced to a depth of 70 feet bgs down-gradient of monitoring well MW-7 (Figures 2 and 4). Reconnaissance groundwater samples were collected from boring FB-1 at 12.5, 31.5, and 68.5 feet bgs during drilling. The analytical results for PCE in all three of the reconnaissance groundwater samples collected were less than the MTCA Method A cleanup level of 5 micrograms per liter (μ g/l) for PCE, indicating that concentrations of PCE in groundwater attenuated with depth (Figure 4).

In accordance with the agreement with Ecology, Farallon (2006b) advanced additional borings proximate to the former dry cleaning machine, collected indoor air samples from the nearest tenant space down-gradient of the Former Cleaning Center of Redmond facility, and conducted confirmation groundwater monitoring. Confirmation soil sampling was conducted by Farallon in June 2007. According to laboratory analytical results, PCE was present at concentrations less than the MTCA cleanup level in soil at the Site.

Four quarters of confirmation groundwater monitoring were completed at monitoring wells MW-1 through MW-3, MW-7, and MW-9 in August and November 2006, and in February and May 2007. Confirmation groundwater monitoring at monitoring well MW-8, proximate to the Sammamish River, had previously been completed from June 2001 through August 2004. The estimated direction of groundwater flow was consistently to the northwest during confirmation groundwater monitoring events, consistent with prior monitoring events at the Site. PCE was not detected at concentrations exceeding the MTCA Method A cleanup level of 5 μ g/l in confirmation groundwater samples collected from the Site. Upon receipt of the NFA determination, the monitoring wells were decommissioned between March 2012 and September 2014.



Vapor intrusion assessments were conducted in June 2007 and June 2010 as part of the remedial investigation and regulatory closure activities, respectively, at the Property and again in March 2014 as a condition of the Property-specific NFA determination. Results of these assessments demonstrated that residual concentrations of PCE in the subsurface are protective of commercial workers and meet MTCA cleanup standards for protection of human health and the environment.

2.4 REGULATORY STATUS

As discussed, Ecology issued a Property-specific NFA determination for a portion of the Site on April 1, 2011. The Property-specific NFA determination did not include a portion of the Site northwest of the Property (Appendix A). Farallon understands that Ecology limited the NFA determination to the Property because there was no down-gradient point of compliance delineating the groundwater plume northwest of former monitoring well MW-8, proximate to the Sammamish River. Monitoring well MW-8 was installed along the centerline of the groundwater plume at the most down-gradient location accessible to install a monitoring well. This location is immediately up-gradient of the Sammamish River, approximately 70 feet from the river's edge and approximately 50 feet from the top of the river bank (Figures 2 and 4). The asphalt-paved Sammamish River pedestrian trail, approximately 20 feet west of former monitoring well MW-8, lies between the top of the river bank and former monitoring well MW-8. King County owns the land, including the Sammamish River pedestrian trail and the location of former monitoring well MW-8, which was installed pursuant to an access agreement with King County. It was not practicable to install an additional monitoring well down-gradient of former monitoring well MW-8 for the following reasons:

- Drilling on the river bank is not possible due to a steep slope and the presence of rip-rap boulders, and because it is an environmentally sensitive area;
- Drilling on top of or proximate to the Sammamish River Trail would have necessitated closure of the trail to pedestrian traffic and was not allowed by the property owner, King County; and
- The only location closer to the Sammamish River than former monitoring well MW-8 that could be drilled along the flow path was only 10 to 15 feet further northwest of the former location of monitoring well MW-8. This location, proximate to former monitoring well MW-8, would not provide any meaningful data to define the northwesterly extent of the former PCE plume in groundwater.

Farallon (2006a) provided vertical delineation of the plume depth using reconnaissance groundwater samples from deep boring FB-1, advanced in August 2006. This vertical delineation established that concentrations of PCE exceeding the MTCA Method A cleanup level were limited to the uppermost portion of the shallow water-bearing zone. Based on groundwater level elevations and estimated flow direction, the shallow water-bearing zone discharges to the Sammamish River (Figures 2 and 4). Figures depicting the plume footprint prior to implementation of the cleanup action showed the plume extending slightly beyond former monitoring well MW-8 to the vicinity of the eastern bank of the Sammamish River. These figures

2-4



accurately represent the down-gradient extent of the plume as it is not technically possible for the plume to migrate past the discharge point (the eastern bank and base of the Sammamish River) (Figure 4). Installation of a monitoring well down-gradient of former monitoring well MW-8 prior to implementation of the cleanup action was not practicable or technically necessary.

2-5



3.0 TECHNICAL COMPONENTS OF CLEANUP ACTION

Farallon previously established the MTCA Method A cleanup levels for unrestricted land use as the cleanup levels for PCE at the Cleaning Center of Redmond Site. Due to the proximity of the northwestern portion of the Site to the Sammamish River, Farallon recommends the use of Washington State Surface Water Quality Criteria (Table 240 of WAC 173-201A-240, updated August 2016) as the basis for the groundwater cleanup level at the Site to protect the designated/beneficial uses of the surface water. No freshwater aquatic life water quality criteria have been established for PCE, so human health criteria for the consumption of water and aquatic organisms will be used. The water quality criterion for PCE in Table 240 of WAC 173-201A-240 is more stringent than the MTCA Method A cleanup level. The selected groundwater cleanup level for PCE is $4.9 \mu g/l$ (Table 240, WAC 173-201A-240).

The groundwater plume at the Site was delineated to the extent practicable per the discussion in Section 2.4, Regulatory Status. COC concentrations in groundwater across the former monitoring well network at the Site decreased to less than the proposed cleanup levels established in this Site Closure Report Addendum after initiation of the cleanup action, which took place from August 2003 through August 2006 (Table 2). Linear regression trends for PCE concentrations in groundwater versus time for former source area monitoring well MW-9 and former down-gradient monitoring wells MW-7 and MW-8 between the source area and the Sammamish River are provided in Appendix D. The linear regression trend lines for former monitoring wells MW-7 through MW-9 each indicate a decreasing trend in PCE concentrations in groundwater. In addition, PCE concentrations detected in groundwater samples collected from the former monitoring well network during the groundwater compliance monitoring period in 2006 and 2007 demonstrated that PCE concentrations remained stable and less than applicable cleanup levels after the SVE remediation system ceased operation.

To address Ecology's concerns regarding delineation between former monitoring well MW-8 and the Sammamish River, Farallon requests approval of a conditional point of compliance (CPOC) at the location of former monitoring well MW-8 in accordance with WAC 173-340-720(8)(d)(ii) and the Ecology Memorandum, to facilitate issuance of a Site-wide NFA determination. CPOC example 5b on page 14 of the Ecology Memorandum for a source property near, but not abutting, a surface water closely resembles Site conditions. The CPOC at former monitoring well MW-8 is appropriate based on the flow chart for setting points of compliance provided as Figure 6 in the Ecology Memorandum. A summary of Farallon's evaluation of this CPOC using the flow chart in the Ecology Memorandum is included below:

• *Practicable to meet cleanup levels throughout the site within reasonable restoration time frame?* Unknown; Site characterization was not considered complete by Ecology due to the lack of a delineation well northwest of former monitoring well MW-8, proximate to the Sammamish River. The Site area at and up-gradient of monitoring well MW-8 did meet cleanup levels within a reasonable restoration time frame. Concentrations of PCE in groundwater down-gradient of monitoring well MW-8 were not characterized for the reasons identified in Section 4.0, Conclusions and Request for NFA Determination.



- *Practicable to meet cleanup levels within property boundary within reasonable restoration time frame?* Unknown at the time when PCE contamination in groundwater extended off the Property to former monitoring well MW-8. The cleanup action at the Site ultimately reduced the concentrations of PCE in groundwater to concentrations less than applicable MTCA cleanup levels.
- *Is there area-wide groundwater contamination*? Not at concentrations exceeding MTCA Method A cleanup levels. There is an area-wide plume of PCE in groundwater at concentrations that are less than the MTCA Method A cleanup level and the surface water criterion. This area-wide plume emanates from sources up-gradient of the Site.
- *Is the contaminated groundwater discharging, or likely to discharge to surface water?* Undetermined at the time when the PCE plume in groundwater existed. It is possible that PCE-contaminated groundwater could have discharged to surface water prior to the cleanup action conducted at the Site. The cleanup action reduced PCE concentrations in groundwater to less than applicable cleanup levels established in this Site Closure Report Addendum.
- Does the source property abut surface water? No.
- *Is the source property near surface water?* Yes, the source Property is near, but does not abut, surface water.
- *Does the Site meet the conditions in WAC 173-340§720(8)(d)(ii)?* Yes, the Site meets the conditions in WAC 173-340§720(8)(d)(ii). The use of surface water quality criteria as groundwater cleanup levels, where available, protects the designated/beneficial use of the surface water.
- Does groundwater meet cleanup levels before discharging to surface water? It is unclear if PCE concentrations in groundwater discharging to the Sammamish River were less than applicable cleanup levels when the PCE plume in groundwater existed prior to initiation of the cleanup action. PCE concentrations could not be assessed between former monitoring well MW-8 and the Sammamish River due to access limitations. After the cleanup action was initiated, PCE concentrations in groundwater declined to less than the applicable MTCA cleanup levels prior to discharge into the surface water; therefore, PCE associated with the Site currently does not discharge to the Sammamish River.

Farallon requests approval of a CPOC at former monitoring well MW-8 based on the above review of the applicability of implementation of the CPOC. Concentrations of PCE in groundwater at former monitoring well MW-8 were less than the cleanup level established in this Site Closure Report Addendum for 3 years (June 2001 through August 2004) prior to discontinuation of sampling at that monitoring well. In addition, concentrations of PCE in groundwater remained less than applicable cleanup levels for 4 years (November 2003 through May 2007) at downgradient monitoring well MW-7 closer to the former source, which includes a monitoring period that extends 3 years beyond the discontinuation of sampling at former monitoring well MW-8. In addition, concentrations of PCE in groundwater remained less than applicable cleanup levels at all



other monitoring wells associated with the Site for a minimum of four quarters. These data support Farallon's assertion that the cleanup action was successful in remediating the PCE plume in groundwater across the entire Site and that cleanup levels were achieved at the CPOC.

3-2



4.0 CONCLUSIONS AND REQUEST FOR NFA DETERMINATION

The cleanup action successfully remediated each medium of concern across the Site. Ecology issued a Property-specific NFA determination in April 2011 that did not include the portion of the Site outside the Property boundaries to the northwest. It is Farallon's understanding that a Site-wide NFA determination was not issued due to the lack of a down-gradient delineation well between former monitoring well MW-8 and the Sammamish River. It was not practicable or necessary to install an additional monitoring well between former monitoring well MW-8 and the Sammamish River for the following reasons:

- Drilling on the river bank is not possible due to a steep slope and the presence of rip-rap boulders, and because it is an environmentally sensitive area.
- Drilling on top of or proximate to the Sammamish River Trail would have necessitated closure of the trail to pedestrian traffic and was not allowed by the property owner, King County.
- The only location closer to the river than former monitoring well MW-8 that could be drilled along the flow path was only 10 to 15 feet further northwest of the location of former monitoring well MW-8. This location, proximate to former monitoring well MW-8, would not provide any meaningful data to define the northwesterly extent of the former plume.
- The shallow water-bearing zone, where the PCE plume was located, discharges to the Sammamish River and it is not technically possible for the plume to migrate past the discharge point (the eastern bank and base of the Sammamish River) (Figure 4).

Farallon proposes the use of a CPOC at the location of former monitoring well MW-8 to address Ecology's concern regarding the delineation of the PCE plume in groundwater between former monitoring well MW-8 and the Sammamish River. Implementation of a CPOC is appropriate based on review of the Ecology Memorandum that includes a flow chart for setting points of compliance.

Concentrations of PCE in groundwater at CPOC monitoring well MW-8 were less than the cleanup level established in this Site Closure Report Addendum ($4.9 \mu g/l$) for 3 years (June 2001 through August 2004) prior to discontinuation of sampling at that monitoring well. In addition, concentrations of PCE in groundwater remained less than applicable cleanup levels at all other monitoring wells associated with the Site for a minimum of four quarters. These data support Farallon's assertion that the cleanup action was successful in remediating the PCE plume in groundwater across the entire Site and that applicable groundwater cleanup levels were met at the selected CPOC. Based on the information provided in the Closure Report and this Site Closure Report Addendum, Farallon respectfully requests a Site-wide NFA determination and that the Site be removed from Ecology's Hazardous Waste Sites List.



5.0 REFERENCES

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5-2



6.0 LIMITATIONS

6.1 GENERAL LIMITATIONS

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

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

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

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

6.2 LIMITATION ON RELIANCE BY THIRD PARTIES

Reliance by third parties is prohibited. This report/assessment has been prepared for the exclusive use of Nelgroup Properties LLC to address the unique needs of Nelgroup Properties LLC at the Site at a specific point in time. Services have been provided to Nelgroup Properties LLC in accordance with a contract for services between Farallon and Nelgroup Properties LLC, and generally accepted environmental practices for the subject matter at the time this report was prepared.

No other party may rely on this report unless Farallon agrees in advance to such reliance in writing. Any use, interpretation, or reliance upon this report/assessment by anyone other than Nelgroup Properties LLC is at the sole risk of that party, and Farallon will have no liability for such unauthorized use, interpretation, or reliance.

6-1



Do not rely on this report/assessment if:

- It was not prepared for you;
- It was not prepared for your project;
- It was not prepared for your specific Site; or
- It was not prepared under an approved scope of work for which you are under contract with Farallon.

FIGURES

SITE CLOSURE REPORT ADDENDUM Former Cleaning Center of Redmond 15796 Redmond Way Redmond, Washington

Farallon PN: 650-001







FURTHER ACTION DETERMINATION) MONITORING WELL (DECOMMISSIONED PRIOR TO CLEANUP DUE TO CONSTRUCTION OF NEW BUILDING)

ALL LOCATIONS ARE APPROXIMATE

120

SCALE IN FEET



REDMOND SHOPPING SQUARE PROPERTY CITY OF REDMOND VCP NW 2415

SOURCE #2

Washington Issaquah | Bellingham | Seattle Oregon Portland | Bend | Baker City California Oakland | Sacramento | Irvine

FIGURE 3

FORMER EXTENT OF SITES REDMOND, WASHINGTON

FARALLON PN: 650-007

Checked By: CS

Date: 4/6/2016 Disk Reference: 650-007.dwg



TABLES

SITE CLOSURE REPORT ADDENDUM Former Cleaning Center of Redmond 15796 Redmond Way Redmond, Washington

Farallon PN: 650-001

Table 1Summary of Groundwater ElevationsCleaning Center of RedmondRedmond, WashingtonFarallon PN: 650-001

		Top of Well Casing	Depth to Water	Groundwater
Well Identification	Date	Elevation (feet)	(feet) ¹	Elevation (feet)
	12/20/2000		11.1	23.85
	6/6/2001		10.47	24.48
	6/28/2002		11.51	23.44
	8/13/2003		12.33	22.62
	11/12/2003		10.58	24.37
	2/18/2004		8.71	26.24
MW-1	5/10/2004	34.95 ²	11.43	23.52
	8/27/2004		11.26	23.69
	2/15/2006		8.37	26.58
	8/23/2006		12.73	22.22
	11/21/2006		6.71	28.24
	2/28/2007		9.81	25.14
	5/15/2007		10.83	24.12
	12/20/2000		12.07	23.56
	6/6/2001		11.43	24.2
	6/28/2002	- - -	12.58	23.05
	8/13/2003		13.27	22.36
	11/12/2003		11.65	23.98
	2/18/2004		9.95	25.68
MW-2	5/10/2004	35.63 ²	12.47	23.16
	8/27/2004		12.11	23.52
	2/15/2006		9.60	26.03
	8/23/2006		12.72	22.91
	11/21/2006		7.49	28.14
	2/28/2007		10.91	24.72
	5/15/2007		11.99	23.64
	12/20/2000		9.7	23.58
	6/6/2001	33.28 ²	9.08	24.2
	6/28/2002		10.22	23.06
	8/13/2003		10.88	22.4
	11/12/2003		9.31	23.97
	2/18/2004		7.59	25.69
MW-3	5/10/2004		10.1	23.18
	8/27/2004		9.73	23.55
	2/15/2006		7.25	26.03
	8/23/2006		10.37	22.91
	11/21/2006		5.11	28.17
	2/28/2007		8.51	24.77
	5/15/2007		9.62	23.66

Table 1Summary of Groundwater ElevationsCleaning Center of RedmondRedmond, WashingtonFarallon PN: 650-001

Well Identification	Date	Top of Well Casing Elevation (feet)	Depth to Water (feet) ¹	Groundwater Elevation (feet)
	12/20/2000	, <i>, , , , , , , , , , , , , , , , , , </i>	9.71	89.11
N (1337 - 4	6/6/2001	00.023	9.18	89.64
IVI W -4	6/28/2002	98.82	10.26	88.56
	8/13/2003		Well decor	nmissioned.
	12/20/2000		11.97	24.22
	6/6/2001		11.47	24.72
	6/28/2002		12.52	23.67
	8/13/2003		13.41	22.78
	11/12/2003		11.47	24.72
	2/18/2004		9.46	26.73
MW-5	5/10/2004	36.19 ²	12.41	23.78
	8/27/2004	1	12.41	23.78
	2/15/2006		9.18	27.01
	8/23/2006		12.73	23.46
	11/21/2006		7.92	28.27
	2/28/2007		10.75	25.44
	5/15/2007		11.73	24.46
	12/20/2000		9.81	88.71
MW 6	6/6/2001	98.52 ³	9.19	89.33
141 44 -0	6/28/2002		10.33	88.19
	8/13/2003		Well decommissioned.	
	12/20/2000		9.7	23.46
	6/6/2001		9.02	24.14
	6/28/2002		10.21	22.95
	8/13/2003		10.85	22.31
	11/12/2003		9.32	23.84
	2/18/2004		7.68	25.48
MW-7	5/10/2004	33.16 ²	10.07	23.09
	8/30/2004		9.72	23.44
	2/15/2006		7.31	25.85
	8/23/2006		10.35	22.81
	11/21/2006		5.02	28.14
	2/28/2007		8.54	24.62
	5/15/2007		9.68	23.48

2 of 3

Table 1Summary of Groundwater ElevationsCleaning Center of RedmondRedmond, WashingtonFarallon PN: 650-001

Well Identification	Date	Top of Well Casing Elevation (feet)	Depth to Water (feet) ¹	Groundwater Elevation (feet)
	12/20/2000		11.12	22.86
	6/6/2001		10.34	23.64
	6/28/2002		11.61	22.37
	8/13/2003		12.1	21.88
	11/12/2003		10.82	23.16
	2/18/2004		9.42	24.56
MW-8	5/10/2004	33.98 ²	11.51	22.47
	8/27/2004		10.79	23.19
	2/15/2006		9.02	24.96
	8/23/2006		11.69	22.29
	11/21/2006		5.98	28.00
	2/28/2007		10.06	23.92
	5/15/2007		11.26	22.72
	8/13/2003		11.38	22.62
	11/12/2003		9.6	24.4
	2/18/2004		7.72	26.28
	5/10/2004		10.46	23.54
N (N) o 4	8/27/2004	24.00^{2}	10.28	23.72
MW-9	2/15/2006	34.00	7.36	26.64
	8/23/2006		10.72	23.28
	11/21/2006		5.72	28.28
	2/28/2007		8.79	25.21
	5/15/2007		9.82	24.18

NOTES:

— = not applicable

¹ In feet below top of casing.

² In feet above mean sea level.

³ Relative to an on-site datum of 100 feet.

⁴ Well installed on November 19, 2002.

Table 2Summary of Groundwater Sample Analytical Results - PCECleaning Center of RedmondRedmond, WashingtonFarallon PN: 650-001

			Analytical Results (micrograms per liter) ¹
Well/Sample			
Identification	Date Sampled	Sample Collected By	Tetrachloroethene
	3/6/2000	GeoEngineers	1.6
	8/8/2000	GeoEngineers	5.4
	12/20/2000	Farallon	2.7
	6/6/2001	Farallon	1.3
	6/28/2002	Farallon	2.1
	8/13/2003	Farallon	1.2
	11/12/2003	Farallon	3.3
MW-1	2/18/2004	Farallon	2.9
	5/10/2004	Farallon	4.0
	8/27/2004	Farallon	8.5
	2/15/2006	Farallon	2.4
	8/23/2006	Farallon	3.3
	11/21/2006	Farallon	4.5
	2/28/2007	Farallon	2.3
	5/15/2007	Farallon	3.3
	3/6/2000	GeoEngineers	<1.0
	8/8/2000	GeoEngineers	2.9
	12/20/2000	Farallon	2.9
	6/6/2001	Farallon	1.9
	6/28/2002	Farallon	0.81
	8/13/2003	Farallon	0.99
	11/12/2003	Farallon	0.66
MW-2	2/18/2004	Farallon	0.88
	5/10/2004	Farallon	0.54
	8/27/2004	Farallon	0.56
	2/15/2006	Farallon	1.1
	8/23/2006	Farallon	1.0
	11/21/2006	Farallon	1.1
	2/28/2007	Farallon	0.83
	5/15/2007	Farallon	1.30
	3/6/2000	GeoEngineers	<1.0
	8/8/2000	GeoEngineers	<1.0
	12/20/2000	Farallon	0.34
	6/6/2001	Farallon	2.0
	6/28/2002	Farallon	2.0
	8/13/2003	Farallon	7.3
	11/12/2003	Farallon	4.5
MW-3	2/18/2004	Farallon	2.8
	5/10/2004	Farallon	3.5
	8/27/2004	Farallon	6.7
	2/15/2006	Farallon	2.1
	8/23/2006	Farallon	2.5
	11/21/2006	Farallon	5.0
	2/28/2007	Farallon	1.8
	5/15/2007	Farallon	2.5
MTCA Cleanup Level fo	r Groundwater		4.9 ²

Table 2Summary of Groundwater Sample Analytical Results - PCECleaning Center of RedmondRedmond, WashingtonFarallon PN: 650-001

			Analytical Results (micrograms per liter) ¹
Well/Sample Identification	Date Sampled	Sample Collected By	Tetrachloroethene
	3/6/2000	GeoEngineers	50
	8/8/2000	GeoEngineers	9.2
	12/20/2000	Farallon	28
MW-4	6/6/2001	Farallon	16
	6/28/2002	Farallon	14
		Well removed in 2003 due to	construction of new building
	3/6/2000	GeoEngineers	<1.0
	8/8/2000	GeoEngineers	<1.0
	12/20/2000	Farallon	2.0
	6/6/2001	Farallon	1.7
	6/28/2002	Farallon	1.6
	8/13/2003	Farallon	0.2
MW-5	11/12/2003	Farallon	3.6
	2/18/2004	Farallon	4.8
	5/10/2004	Farallon	1.6
	8/27/2004	Farallon	1.4
	2/15/2006	Farallon	4.8
	8/23/2006	Farallon	1.0
	3/6/2000	GeoEngineers	11
	8/8/2000	GeoEngineers	27
	12/20/2000	Farallon	15
MW-0	6/6/2001	Farallon	8.6
	6/28/2002	Farallon	6.3
	Well removed in 2003 due to construction of new building		
	3/28/2000	GeoEngineers	15
	8/8/2000	GeoEngineers	14
	12/21/2000	Farallon	12
	6/6/2001	Farallon	7.6
	6/28/2002	Farallon	3.9
	8/13/2003	Farallon	5.3
	11/12/2003	Farallon	4.5
MW-7	2/18/2004	Farallon	3.6
	5/10/2004	Farallon	3.3
	8/30/2004	Farallon	3.6
	2/15/2006	Farallon	2.5
	8/23/2006	Farallon	2.3
	11/21/2006	Farallon	2.2
	2/28/2007	Farallon	2.1
	5/15/2007	Farallon	2.9
A Cleanun I aval fa	r Groundwater		4 9 ²

Table 2Summary of Groundwater Sample Analytical Results - PCECleaning Center of RedmondRedmond, WashingtonFarallon PN: 650-001

			Analytical Results (micrograms per liter) ¹
Well/Sample			
Identification	Date Sampled	Sample Collected By	Tetrachloroethene
	4/14/2000	GeoEngineers	7.4
	8/8/2000	GeoEngineers	8.5
	12/20/2000	Farallon	5.7
	6/6/2001	Farallon	3.9
MW 8	6/28/2002	Farallon	4.1
IVI VV -0	8/13/2003	Farallon	3.4
	11/12/2003	Farallon	0.62
	2/18/2004	Farallon	0.3
	5/10/2004	Farallon	2.8
	8/27/2004	Farallon	0.43
	8/13/2003	Farallon	7.4
	11/12/2003	Farallon	3.7
	2/18/2004	Farallon	2.9
	5/10/2004	Farallon	2.5
MW 0	8/27/2004	Farallon	3.0
IVI VV -9	2/15/2006	Farallon	2.5
	8/23/2006	Farallon	1.6
	11/21/2006	Farallon	2.1
	2/28/2007	Farallon	2.4
	5/15/2007	Farallon	1.8
	Ι	Reconnaissance Groundwater Sa	mples
FB-1-GW-12.5	8/21/2006	Farallon	2.4
FB-1-GW-31.5	8/21/2006	Farallon	0.95
FB-1-GW-68.5	8/21/2006	Farallon	<0.20
ITCA Cleanup Level for Groundwater			4.9 ²

NOTES:

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

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

¹ Analyzed by U.S. Environmental Protection Agency Method 8260B.

² Value from Table 240, Section 240 of the Water Quality Standards for Surface Waters of the State of Washington, as established in Chapter 173-201A of the Washington Administrative Code, as amended August 1, 2016.

Farallon = Farallon Consulting, L.L.C.

GeoEngineers = GeoEngineers, Inc.

MTCA = Washington State Model Toxics Control Act Cleanup Regulations

PCE = tetrachloroethene

TCE = trichloroethene

APPENDIX A NFA DETERMINATION LETTERS

SITE CLOSURE REPORT ADDENDUM Former Cleaning Center of Redmond 15796 Redmond Way Redmond, Washington

Farallon PN: 650-001



APR 05 2011

Farallon Consulting, L.L.C.

STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

PO Box 47600 • Olympia, WA 98504-7600 • 360-407-6000 711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

April 1, 2011

Mr. Thomas Markl Nelson Real Estate Management, L.L.C Post Office Box 461 Redmond, Washington 98073-0461

Re: No Further Action at a Property Associated with a Site:

- **Property Address:** Cleaning Center of Redmond -15796 Redmond Way, Redmond, WA 98052
- Facility/Site No.: 26296554
- VCP Project No.: NW1324

Dear Mr. Marki:

The Washington State Department of Ecology (Ecology or we) received your request for an opinion on your independent cleanup of a Property associated with the Cleaning Center of Redmond facility (Site). This letter provides our opinion. We are providing this opinion under the authority of the Model Toxics Control Act (MTCA), Chapter 70.105D RCW.

Issues Presented and Opinion

1. Is further remedial action necessary at the property to clean up contamination associated with the Site?

NO. Ecology has determined that no further remedial action is necessary at the property to clean up contamination associated with the Site.

This opinion is dependent on the continued performance and effectiveness of the post-cleanup controls and monitoring specified below.

2. Is further remedial action still necessary elsewhere at the Site?

YES. Ecology has determined that further remedial action is still necessary elsewhere at the Site.

This opinion is based on an analysis of whether the remedial action meets the substantive requirements of MTCA, Chapter 70.105D RCW, and its implementing regulations, Chapter 173-340 WAC (collectively "substantive requirements of MTCA"). The analysis is provided below.

Description of the Property and the Site

This opinion applies only to the property and the Site described below. This opinion does not apply to any other sites that may affect the Property. Any such sites, if known, are identified separately below.

1. Description of the Property.

The property includes tax parcel number **7198900080** in King County, which was affected by the Site and addressed by your cleanup. The property known as the Redmond Center Property (Nelgroup Properties LLC) is affected by two releases (sources); hence, two sites.

The first release is due to historical activities associated with the Cleaning Center of Redmond and is being addressed by this property no further action (NFA) and constitutes:

- Tetrachloroethylene (PCE) in soil.
- Tetrachloroethylene (PCE) in groundwater.
- Tetrachloroethylene (PCE) and Trichloroethene (TCE) in soil vapor and indoor air.

The second release southwest of the Redmond Centre property appears to be from offproperty-related historical activities from an up-gradient source associated with the Former Redmond WASH N' DRY and identified as the Redmond Shopping Square Property (city of Redmond) and is not part of this NFA.

The second release constitutes:

- Tetrachloroethylene (PCE) in groundwater.
- Tetrachloroethylene (PCE) in soil.
- Potentially, Tetrachloroethylene (PCE) in the vapor phases for both indoor and outdoor air.

Enclosure A includes a legal description of the Property. Enclosure B includes a diagram of the Site that illustrates the location of the property within the site (first release).

2. Description of the Site.

The Site is defined by the nature and extent of contamination associated with the first release as described above.

- Tetrachloroethylene (PCE) in soil.
- Tetrachloroethylene (PCE) in Ground Water.
- Tetrachloroethylene (PCE) and Trichloroethene (TCE) in soil vapor and indoor air.

Enclosure B includes a detailed description and diagram of the Site, as currently known to Ecology.

3. Identification of Other Sites that may affect the Property.

A report contained in Ecology files show that the Redmond Shopping Square Property (city of Redmond) historically operated a dry cleaning service identified as the Wash N' Dry facility (See Enclosure C-1). Data shows that this facility is currently undergoing an independent cleanup of the PCE impacts to the soil and groundwater at that location. The Wash N' Dry cleaner facility located up-gradient, along a southwesterly groundwater flow is identified as the potential source impacting the Redmond Center Property (Nelgroup Properties LLC), identified in this letter as the second site (See Enclosure C-2). The Wash N' Dry facility is located at 16101 through 16149 Redmond Way. Please refer to Enclosure C-1 for locations of the two properties noted above and to Enclosure C-2 for the locations of the two sites (PCE plumes in the groundwater) located within the Redmond Center Property (Nelgroup Properties LLC).

Basis for the Opinion

This opinion is based on the information contained in the documents listed in Enclosure D. Those documents are kept in the Central Files Ecology's of the Northwest Regional Office of Ecology (NWRO) for review by appointment only. You can make an appointment by calling the NWRO resource contact at 425-649-7239.

This opinion is void if any of the information contained in those documents is materially false or misleading.

Analysis of the Cleanup

1. Cleanup of the Property located within the Site.

Ecology has concluded that **no further remedial action** is necessary at the property to clean up contamination associated with the Site. That conclusion is based on the following analysis:

a. Characterization of the Site.

Ecology has determined your characterization of the Site is sufficient to establish cleanup standards for the Site and select a cleanup for the property. The Site is described above and in Enclosure B.

b. Establishment of cleanup standards for the Site.

i. Substance-specific standards.

Ecology has determined the cleanup levels and points of compliance you established for the Site meet the substantive requirements of MTCA.

The cleanup levels are as follows:

Soil: Tetrachloroethylene (PCE) in soil at 0.05 mg/kg for the protection of drinking water and indoor air and unrestricted land use.

Groundwater: Tetrachloroethylene (PCE) in Ground Water at 5 ug/l for the protection of drinking water.

Indoor air: Tetrachloroethylene (PCE) at 4.27 ug/m+ 3 and Trichloroethene (TCE) at 0.93 ug/m+ 3 for the protection of commercial workers

Standard compliance points are as follows:

Soil: For the Direct Contact: From the ground surface to 15 feet below surface throughout the property. Please refer to Enclosure B for property.

Groundwater: Performance standards for the groundwater were measured from the uppermost level of the saturated zone extending vertically to the lowest-most depth which could be potentially affected by the property. These monitoring points are shown in Monitoring wells MW-1 through MW-8 as shown in Enclosure B.

Indoor Air: A site-specific risk assessment used a time weighted average as shown in table 1 of the August 31, 2010, Indoor Air Assessment. Performance monitoring was conducted at the floor drains and at the breathing spaces (about 4 feet above the ground) at the restrooms and center of the Staples Store as part of the evaluation of the cleanup standards for the indoor air. Locations of the points of compliance for the indoor air are located in Enclosure E. Please refer to Enclosure E for Table 1. The compliance points measured as part of the NFA performance monitoring and to be measured during the confirmation monitoring (Post NFA) as part of the five-year review are located in the center of the Staples Store and in the restroom of the Staples Store please refer to Enclosure E for post NFA Confirmation monitoring points and compliance points.

c. Selection of cleanup for the Property.

Ecology has determined the cleanup you selected for the property for the first release as described in the above (under the description of the property) meets the substantive requirements of MTCA. The cleanup meets the minimum cleanup requirements and does not exacerbate conditions or preclude reasonable cleanup alternatives elsewhere at the Site.

The cleanup consisted of over excavation of soil, vapor extraction, and natural attenuation of groundwater. These actions have removed contaminants below cleanup levels and meets the minimum requirements in WAC 173-340-360(2) and do not either exacerbate conditions at the Site or preclude reasonable alternatives.

d. Cleanup of the Property.

Ecology has determined the cleanup you performed for the first release as described in the above (under the description of the property) meets the applicable Site cleanup standards within the property. This determination is dependent on the continued performance and effectiveness of the post-cleanup controls and monitoring specified below.

The cleanup consisted of over excavation of soil, vapor extraction and natural attenuation of groundwater. These actions have removed contaminants below cleanup levels and meets the minimum requirements in WAC 173-340-360(2) and do not either exacerbate conditions at the Site or preclude reasonable alternatives. This cleanup does not affect the cleanup necessary to address the second release of PCE from an up-gradient source that has migrated onto the property because the two plumes are not comingled. Please refer to Enclosures C-1 and C-2 respectively for the location of up-gradient source and subsequent migration onto the property.

2. Cleanup of the Site as a whole.

Ecology has concluded that further remedial action under MTCA is still necessary elsewhere at the Site. In other words, while your cleanup constitutes the final action for the property, it constitutes only an "interim action" for Site No. 1 as a whole. There is also a second plume of PCE coming from Redmond Shopping Square property. Please refer to Enclosures B, C-1 and C-2 respectively for the two sites and the plume coming from off property sources identified as the Redmond Shopping Square property

Post-Cleanup Controls and Monitoring

3. Performance of conformational monitoring.

Conformational indoor air monitoring (Post NFA) is necessary at the property to confirm the long-term effectiveness of the cleanup. Conformational monitoring is to occur in the third year after the issuance of this NFA letter with the results sent to Ecology. Confirmational monitoring points and parameters to be measured are identified in Enclosure E and Table 1. The confirmation monitoring (Post NFA) is the basis for Ecology's five-year review period. Ecology has approved the monitoring plan you submitted. A copy of the plan is included in Enclosure F.
Mr. Thomas Markl April 1, 2011 Page 6

Periodic Review of Post-Cleanup Conditions

As noted above, Ecology will conduct periodic reviews of post-cleanup conditions at the property to ensure that they remain protective of human health and the environment. At the minimum, Ecology shall conduct a periodic review on the fifth year following the date of this NFA - April 1, 2016. If Ecology determines based on a periodic review that further remedial action is necessary at the property, Ecology will then withdraw this opinion.

Listing of the Site

Based on this opinion, we will update the status of remedial action at the Site on our database of hazardous waste sites. However, because further remedial action is still necessary elsewhere at the Site, we will not remove the Site from our lists of hazardous waste sites. The property will remain listed as part of the Site because the cleanup of the property does not change the boundaries of the Site. Even if you address the site as it relates to the first release due to property-related operational activities, further action will still be needed at the property to address the second release coming from an off-property and up-gradient location before the property can be de-listed from our database of hazardous waste sites

Limitations of the Opinion

1. Opinion does not settle liability with the state.

Liable persons are strictly liable, jointly and severally, for all remedial action costs and for all natural resource damages resulting from the release or releases of hazardous substances at the Site. This opinion **does not**:

- Change the boundaries of the Site.
- Resolve or alter a person's liability to the state.
- Protect liable persons from contribution claims by third parties.

To settle liability with the state and obtain protection from contribution claims, a person must enter into a Consent Decree with Ecology under RCW 70.105D.040(4).

2. Opinion does not constitute a determination of substantial equivalence.

To recover remedial action costs from other liable persons under MTCA, one must demonstrate that the action is the substantial equivalent of an Ecology-conducted or Ecology-supervised action. This opinion does not determine whether the action you performed is substantially equivalent. Courts make that determination. See RCW 70.105D.080 and WAC 173-340-545.

Mr. Thomas Markl April 1, 2011 Page 7

3. State is immune from liability.

The state, Ecology, and its officers and employees are immune from all liability, and no cause of action of any nature may arise from any act or omission in providing this opinion. See RCW 70.105D.030(1)(i).

Contact Information

Thank you for cleaning up your property under the Voluntary Cleanup Program (VCP). We look forward to working with you to clean up the remainder of the Site.

For more information about the VCP and the cleanup process, please visit our web site: <u>www.</u> <u>ecy.wa.gov/programs/tcp/vcp/vcpmain.htm</u>. If you have any questions about this opinion, please contact me by phone at 360-407-7239 or by e-mail at mknu461@ecy.wa.gov.

Sincerely,

Michael Hunt

Michael Kuntz, P.G.,P.HG. HQ Toxics Cleanup Program

Enclosures:

- A Legal Description of the Property
- B Description and Diagrams of the Site (including the Property)
- C 1 Two Properties
- C 2 Two Sites
- D Basis for the Opinion: List of Documents
- E Indoor Air Compliance
- F Conformational Monitoring Plan
- cc: Cliff Schmitt, Farallon Consulting Dolores Mitchell (without enclosures)

Enclosure A

Legal Description of the Property

LEGAL DESCRIPTION OF LOT 1 OF REDMOND CENTER

LOT 1:

All of Lot 8 and the south 70 feet of Lot 10 of the Plat of Redmond Center as recorded in volume 95 of Plats, Pages 94 through 97, in King County, Washington, and that portion of Lot 9 of said Plat of Redmond Center described as follows:

Beginning at the southwest corner of said Lot 9; thence north 0°49'10" east 70.00 feet along the west line of said Lot 9; thence south 89°10'50" east 120.24 feet to the point of curvature of a 300 foot radius curve to the right; thence easterly along said curve an arc distance of 92.83 feet to the point of tangency; thence south 71°27'06" east 84.57 feet; thence south 89°10'50" east 20 feet to the east line of said Lot 9; thence south 0°33'56" west 30 feet along said east line to the southeast corner of said Lot 9; thence north 89°10'50" west 312.28 feet along the south line of said Lot 9 to the point of beginning.

Subject to and together with easements of record.

Filed for record this 3rd day of April, 1991 at 1:42 p.m. in Book 79 of Surveys at page 161 at the request of BUSH, ROED & HITCHINGS, INC. 9104039002

COUNTY AUDITOR OR DIVISION OF RECORDS AND ELECTIONS Jane Hague-County Auditor or Carolyn Ableman-Superintendent of Records

*Source: Lot Line Revision LLR 90-01, Redmond Center. Prepared by Bush, Roed & Hitchings, Inc., Civil Engineers and Land Surveyors, 2009 Minor Avenue East, Seattle, Washington 98102.

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Enclosure B

Description and Diagrams of the Property and Site

PROPERTY DESCRIPTION

The property is located at 15796 Redmond Way in Redmond, Washington in a single-story, commercial strip mall of masonry construction (Figure 2). According to King County Tax Assessor records, the strip mall building was constructed in various stages from 1966 through the early 1980s (King County, Washington 2005). Several remodels have occurred since the early 1980s, with the most recent being a significant expansion near the western end of the strip mall building in 2002. Asphalt-paved parking areas with landscaping strips are located north and south of the building. The strip mall is bordered on the west by 158th Avenue South and on the east by 160th Avenue Northeast. A new building was constructed on the southeastern portion of the property in 2009. The building houses commercial businesses. A sub slab depressurizing system has been installed and has operated continuously since July 24, 2009. Please refer to the enclosures for location of the property and buildings.

The Cleaning Center of Redmond has operated as a dry cleaning facility or dry cleaning drop-off facility from approximately 1990 to the present. In a January 2005 personal communication with Farallon, Ms. Carol Sama, a business consultant with a long-term relationship with Nelgroup Properties LC, stated that a steel pan for the containment of potential spills of PCE as placed beneath the dry cleaning machine at the Cleaning Center of Redmond in 1999 (Farallon 2005). Use of PCE was discontinued when the dry cleaning machine was removed in October 2002, at which time the facility became a drop-off only location for dry cleaning. Regular laundry services are still performed at the Cleaning Center of Redmond.

SITE DESCRIPTION

The site begins at the Former Cleaning Center of Redmond and continues west to the Sammamish River. According to the U.S. Geological Survey (1982) topographic map *Bellevue North, Washington* dated 1982, the Site is at an elevation of approximately 40 feet above mean sea level and is relatively flat. Regional topography in the vicinity slopes to the west. Please refer to enclosures for location of Site.

SECOND PLUME OF TETRACHLORETHYLENE PCE ON THE PROPERTY

A second plume of Tetrachloroethylene exists on the Cleaning Center of Redmond Property. The origin of the plume is very likley the former dry cleaning operation on the Redmond Square Property located to the east and up-gradient of the property. The extent of the plume on the Cleaning Center of Redmond Property is unknown. Please refer to enclosures for plume location and source. Enclosure C-1

Two Properties

Enclosure C-2

Two Sites

Enclosure D

Basis for the Opinion -List of Documents

- 1) VCP Application of September, 2004
- 2) Work Plan for Indoor Air Quality Assessment, March 25, 2011
- 3) Requested Information, Farallon Consulting March 1, 2011
- 4) Response to January 11, 2011, e-mail, Farallon Consulting, January 18, 2011
- 5) Response to Comments, Farallon Consulting, December 28, 2010
- 6) Indoor Air Quality Assessment Results, Farallon Consulting, August 31, 2010
- Request for Opinion Letter of Sufficiency of Cleanup, Farallon Consulting, August 31, 2010
- 8) Work Plan for Indoor Air Quality Assessment, Faallon Consulting, December 31, 2009
- 9) Response to Opinion Letter, Farallon Consulting, November 20, 2009
- 10) Response to Request for Information, Farallon Consulting, July 31, 2009
- 11) Soil Sampling Report, Cleaning Center of Redmond, Farallon Consulting, June 6, 2009
- 12) Site Closure Report, Cleaning Center of Redmond, Farallon Consulting, September 21, 2007
- 13) Borings B-6 and B-7, March 9, 2007, Farallon Consulting
- 14) Response to Ecology Letter, Farallon Consulting, February 7, 2007
- November 2006, Groundwater Monitoring Event, Farallon Consulting, January 9, 2007
- 16) Summary of Meeting Results, Farallon Consulting, September 27, 2006
- 17) Semiannual Groundwater Monitoring Event, Farallon Consulting, September 20, 2006
- 18) Meeting of September 18, 2006
- 19) Request for Additional Information, Farallon Consulting, April 11, 2006
- 20) Letter report of Iscoconcentration Map for August 18, 2004, Groundwater Sampling the Cleaning Center of Redmond
- 21) Letter report of Iscoconcentration Map for February 27, 2004 Groundwater Sampling - the Cleaning Center of Redmond.
- 22) Groundwater and Air Discharge Monitoring Results the Cleaning Center of Redmond, October 27, 2003
- 23) Groundwater Monitoring Results the Cleaning Center of Redmond July 17, 2001

- 24) Phase II Environmental Assessment the Cleaning Centre of Redmond, March 22, 2001
- 25) Groundwater Monitoring Results the Cleaning Center of Redmond, January 22, 2001
- 26) Summary Remedial Investigation Preliminary Feasibility Results the Cleaning Center of Redmond, May 19, 2000
- 27) Letter Report on Environmental Soil and Groundwater Soil Sampling the Cleaning Center of Redmond, March 18, 1999

Enclosure E

Indoor Air Compliance

Confirmational Indoor Air Monitoring Plan (To be performed three years after issuance of the NFA letter with results forwarded to Ecology)

Enclosure A

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PROPERTY AND Site : Enclosure B

Enclosure C-1

Two Properties



Two Properties Enclosure (-1

Enclosure C-2

Two Sites



Enclosure C-2 Two Sites

Enclosure D

Basis for the Opinion List of Documents

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- 16) Summary of Meeting Results, Farallon Consulting, September 27, 2006.
- 17) Semiannual Groundwater Monitoring Event, Farallon Consulting, September 20, 2006.
- 18) Meeting of September 18, 2006.
- 19) Request for Additional Information, Farallon Consulting, April 11, 2006.
- 20) Letter report of Iscoconcentration Map for August 18, 2004 Groundwater Sampling the Cleaning Center of Redmond.
- 21) Letter report of Iscoconcentration Map for February 27, 2004 Groundwater Sampling - the Cleaning Center of Redmond.
- 22) Groundwater and Air Discharge Monitoring Results the Cleaning Center of Redmond, October 27, 2003.

- 23) Groundwater Monitoring Results the Cleaning Center of Redmond July 17, 2001.
- 24) Phase II Environmental Assessment the Cleaning Centre of Redmond, March 22, 2001.
- 25) Groundwater Monitoring Results the Cleaning Center of Redmond, January 22, 2001.
- 26) Summary Remedial Investigation Preliminary Feasibility Results the Cleaning Center of Redmond, May 19, 2000.
- 27) Letter Report on Environmental Soil and Groundwater Soil Sampling the Cleaning Center of Redmond, March 18, 1999.

Enclosure E

Indoor Air Compliance



Table 1Summary of Indoor Air Quality Assessment ResultsCleaning Center of RedmondRedmond, WashingtonFarallon PN: 650-001

		Analytical Results (micrograms per cubic meter)	
Sample Location and Identification	Date Collected	Tetrachloroethene	Trichloroethene
Jun	e 2007 Sampling Event	······	
Staples Building Women's Restroom (adjacent to floor drain)/1A-1	6/12/2007	1,4	<0.19
Staples Building Women's Restroom (breathing zone)/1A-2	6/12/2007	1.4	<0.19
Jun	ne 2010 Sampling Event		
Staples Tech Solutions Center Desk #1	6/29/2010	<0.22	<0.18
Staples Womens Restroom #2	6/29/2010	<0.21	<0.17
Staples Roof #3	6/29/2010	<0.21	<0.17
Modified MTCA Method B Formula Values for Indoor Air for Commercial Exposure Scenario ¹		4.27	0.93

NOTES:

< Indicates compound not detected at or above the stated laboratory reporting limit.

¹Washington State Department of Ecology Model Toxics Control Act Cleanup Regulation (MTCA) Method B Formula Values for Air, modified as follows in accordance with Equation 750-2 of Section 750(3)(b)(ii)(B) of Chapter 173-340 of the Washington Administrative Code:

Exposure Duration=250 days/year (5 days/week and 50 week/year work schedule) and a 25-year exposure period.

Indoor air value is a time-weighted average assuming that an employee spends 0.25 hours/day (3 percent) in restroom and 7.75 hours/day (97 percent) in store area.

ENCLOSCRE E-1

1 of 1

Enclosure F

Conformational Indoor Air Monitoring Plan (To be performed three years after issuance of the NFA letter with results forwarded to Ecology)

1



975 5th Avenue Northwest, Issaquah, Washington 98027 Tel: (425) 295-0800 Fax: (425) 295-0850 www.farallonconsulting.com

March 25, 2011

Mr. Michael Kuntz Washington State Department of Ecology PO Box 47600 Olympia, Washington 98504

RE: WORK PLAN FOR INDOOR AIR QUALITY ASSESSMENT CLEANING CENTER OF REDMOND SITE REDMOND, WASHINGTON FARALLON PN: 650-001

Dear Mr. Kuntz:

Farallon Consulting, L.L.C. (Farallon) has prepared this Work Plan for Indoor Air Quality Assessment on behalf of Nelson Real Estate Management LLC to describe procedures to assess indoor air quality for the presence of the dry cleaning solvent tetrachloroethene (PCE) and its degradation product trichloroethene (TCE) at the Staples tenant space located at the Redmond Center property, down-gradient from the Cleaning Center of Redmond at 15796 Redmond Way in Redmond, Washington. The Cleaning Center of Redmond Site is enrolled in the Washington State Department of Ecology (Ecology) Voluntary Cleanup Program (VCP) and has been assigned VCP Identification No. NW1324. Prior cleanup actions at the Cleaning Center of Redmond were conducted in accordance with the Washington State Model Toxics Control Act Cleanup Regulation (MTCA) as established in Chapter 173-340 of the Washington Administrative Code (WAC 173-340).

Ecology is preparing an Opinion Letter on the sufficiency of the cleanup action conducted to address the release of PCE at the Cleaning Center of Redmond. Farallon understands that the Opinion Letter will state that no further cleanup actions are required, contingent on conducting an indoor air monitoring event approximately 3 years after the Opinion Letter is issued to confirm that concentrations of PCE and TCE (if detected) in indoor air are protective of human health for commercial workers and the public. The purpose of this Work Plan for Indoor Air Quality Assessment is to describe the procedures for performing the required indoor air quality assessment.

Prior assessments of indoor air quality at the Staples tenant space were conducted by Farallon in June 2007 and June 2010 at the request of Ecology. These assessments were documented in the letter regarding Indoor Air Quality Assessment Results, Cleaning Center of Redmond Site, Redmond, Washington, Voluntary Cleanup Program Identification No. NW1324 dated August 31, 2010, prepared by Farallon. The Staples tenant space was selected for the assessments because it is the closest tenant space down-gradient from the Cleaning Center of Redmond with a perforation in the floor (floor drain) that potentially could allow concentrations of PCE and its degradation products to enter the building.

G: Projects/650 Nelson Properties/650001 Cleaning Cntr Redmond/Reports/Air Sampling Work Plan/AirQual Assess WP March 2011.docx



• The Summa canisters will be packed in their original shipping containers, sealed with a custody seal, and sent within 3 days to Air Toxics Laboratory in Folsom, California for analysis.

Laboratory Analysis and Evaluation of Results

Air samples will be analyzed for PCE and TCE using modified U.S. Environmental Protection Agency Method TO-15 SIM. The reporting limits for PCE and TCE by this analytical method are approximately 0.2 micrograms per cubic meter, which is less than the commercial worker exposure scenario cleanup levels calculated using Equation 750-2 of WAC 173-340-750 and in accordance with the provisions of WAC 173-340-750(3)(c). The bases for calculating the commercial worker exposure scenario cleanup levels are presented in the Indoor Air Quality Assessment Results report and were agreed to by Ecology. The monitoring results will be evaluated and presented in a letter report.

CLOSING

If the Draft Vapor Intrusion Guidance is modified prior to the confirmation monitoring event required by Ecology in the Opinion Letter, this Work Plan for Indoor Air Quality Assessment will be revised as necessary to conform to the procedures specified in the modified Vapor Intrusion Guidance. Please contact the undersigned at (425) 295-0800 if you have questions or comments regarding this Work Plan.

Sincerely,

Farallon Consulting, L.L.C.

Mpril T. Shmat

Clifford T. Schmitt, L.G., L.H.G. Principal

Attachments: Attachment A, Standard Operating Procedure for Indoor Air Sampling Attachment B, Standard Operating Procedure for Ambient Air Sampling

cc: Thomas L. MarkI, CEO, Nelson Real Estate Management LLC CTS:bjj

ATTACHMENT A

STANDARD OPERATING PROCEDURE FOR INDOOR AIR SAMPLING U.S. ENVIRONMENTAL PROTECTION AGENCY ANALYTICAL METHOD TO-15

This standard operating procedure (SOP) contains the following sections:

1. Purpose

2. Application

3. References

4. Equipment and Supplies

5. Procedures

5.1. Preparation of Buildings for Sampling

5.2. Sampling Methodology

5.3. Post-Sample-Collection Procedures

5.4. Analysis

6. Decontamination

7. Documentation

1.0 Purpose

The purpose of this SOP is to provide personnel with the specific information needed to collect and document consistent and representative indoor air data.

2.0 Application

This SOP is to be followed by all personnel who collect indoor air samples associated with the Cleaning Center of Redmond Site in Redmond, Washington.

3.0 References

- Air Toxics LTD. Guide to Air Sampling and Analysis, Canisters and Tedlar Bags. Fourth Edition. Folsom, California. <www.airtoxics.com>.
- Massachusetts Department of Environmental Protection. 2002. Indoor Air Sampling and Evaluation Guide. Boston, Massachusetts. April.

5.2 Sampling Methodology

Time-integrated indoor air samples are collected using 6-liter Summa canisters prepared under negative pressure and laboratory-certified clean for the constituents of concern for the Cleaning Center of Redmond Site. The Summa canisters should be equipped with dedicated flow regulators set at the appropriate flow rate to allow sampling over the time period desired.

- Verify that the canister number engraved on the canister matches the canister number listed on the certified-clean tag attached to the canister to ensure that proper decontamination of the canister was completed.
- Set up the canister in the desired sample location.
- Verify that the canister value is closed tightly and then remove the threaded cap at the top of the canister.
- Attach the flow regulator/pressure gauge to the top of the canister using a wrench to gently tighten it.
- Open the valve and record the pressure on the gauge as the "initial pressure" in the field notes and on the sample tag attached to the canister.
- Completely fill out the sample tag attached to the canister and record the following sample information in the field book:
 - Site name;
 - Sample identification;
 - Sample start date;
 - Sample start time;
 - Location of sample (show on building floor plan or sketch map);
 - Initial pressure of canister; and
 - Canister number.
- After sampling begins and the canister is verified to be operating correctly, leave the canister to fill.
- Return to check the canisters to ensure that they are operating properly. Depending on the length of the sampling period selected, it will be necessary to return 30 minutes to 1 hour prior to the end of the sampling period. It is necessary to check the canister prior to the complete sampling period because the accuracy of the flow regulators can vary slightly, causing the canisters to fill faster than expected. To check the sample collection progress, complete the following:
 - Record the gauge pressure in the field book. The final pressure at the end of sampling should be approximately -5 to -6 inches of mercury. If the canister has already reached this point, sampling is complete and this pressure should be recorded as the "final pressure" on the sample tag and in the field book. If the pressure is not yet at this level, the canister should be left to continue filling.

ATTACHMENT B STANDARD OPERATING PROCEDURE FOR AMBIENT AIR SAMPLING

WORK PLAN FOR INDOOR AIR QUALITY ASSESSMENT Cleaning Center of Redmond Redmond, Washington

Farallon PN: 650-001

G:\Projects\650 Nelson Properties\650001 Cleaning Cntr Redmond\Reports\Air Sampling Work Plan\AirQual Assess WP March 2011.docx

- U.S. Environmental Protection Agency. 1999. *Method TO-15*. EPA/625/R-96/010b. Cincinnati, Ohio. January.
- Washington State Department of Ecology (Ecology). 2009. Draft Guidance for Evaluating Soil Vapor Intrusion in Washington State: Investigation and Remedial Action. October.

4.0 Equipment and Supplies

The following equipment and supplies are necessary to properly conduct indoor air sampling:

- A sufficient number of 6-liter Summa canisters, appropriate filters, and flow controllers to collect samples required by the Work Plan;
- Equipment required to collect samples using 6-liter Summa canisters, including appropriate wrenches and pressure gauges; and
- Shipping package for the Summa canisters.

5.0 Procedures

5.1 Sampling Locations

Ambient air samples usually are collected near buildings where indoor sampling is occurring. Sample collection points should be selected so that intake occurs at least 6 feet above ground surface and upwind of the building undergoing indoor air sampling.

5.2 Sampling Methodology

Time-integrated ambient air samples are collected using 6-liter Summa canisters prepared under negative pressure and certified clean for the constituent of concern for the Cleaning Center of Redmond Site. The Summa canisters should be equipped with dedicated flow regulators set at the appropriate flow rate to allow sampling over the time period desired.

- Verify that the canister number engraved on the canister matches the canister number listed on the certified-clean tag attached to the canister to ensure that proper decontamination of the canister was completed.
- Set up the canister in the desired sample location.
- Verify that the canister value is closed tightly and then remove the threaded cap at the top of the canister.
- Attach the flow regulator/pressure gauge to the top of the canister using a wrench to gently tighten it.
- Open the valve and record the pressure on the gauge as the "initial pressure" in the field notes and on the sample tag attached to the canister.
- Completely fill out the sample tag attached to the canister and record the following sample information in the field book:

- Site name;

Ensure that documentation of this certification is included on a tag attached to the canister and in the paperwork that accompanies the canister shipment from the laboratory.

7.0 Documentation

Record all field activities, environmental and building conditions, and sample documentation in the field notebook.

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STATE OF WASHINGTON DEPARTMENT OF ECOLOGY

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June 20, 2012

Ms. Elaine Dilley City of Redmond PO Box 97010 Redmond, WA 98073

Re: No Further Action at the Following Site:

- Site Name: Redmond Shopping Square
- Site Address: 16119 NE Redmond Way, Redmond, WA
- Facility/Site No.: 18067
- VCP Project No.: NW 2415
- Cleanup Site ID No.: 11597

Dear Ms. Dilley:

The Washington State Department of Ecology (Ecology) received your request for an opinion on your independent cleanup of the Former Redmond Shopping Square facility (Site). This letter provides our opinion. We are providing this opinion under the authority of the Model Toxics Control Act (MTCA), Chapter 70.105D RCW.

Issue Presented and Opinion

Is further remedial action necessary to clean up contamination at the Site?

NO. Ecology has determined that no further remedial action is necessary to clean up contamination at the Site.

This opinion is based on an analysis of whether the remedial action meets the substantive requirements of MTCA, Chapter 70.105D RCW, and its implementing regulations, Chapter 173-340 WAC (collectively "substantive requirements of MTCA"). The analysis is provided below.



Ms. Elaine Dilley June 20, 2012 Page 2

Description of the Site

This opinion applies only to the Site described below. The Site is defined by the nature and extent of contamination associated with the following releases:

- Heavy oil-range petroleum hydrocarbons in Soil.
- Tetrachloroethene (PCE) and related degradation products in Soil and Ground Water.

Enclosure A includes a detailed description and diagram of the Site, as currently known to Ecology.

Please note a parcel of real property can be affected by multiple sites.

PCE has been consistently detected at low concentrations in shallow groundwater beneath the Property. The PCE concentrations on the Property are similar to those detected throughout downtown Redmond in other studies. This indicates that possible off-property sources may contribute to PCE contamination beneath the Property. However, slightly higher PCE concentrations in the vicinity of the former dry cleaner located on the southwestern portion of the Property indicate an on-property source. At this time, Ecology has no information regarding any off-property PCE sources.

Basis for the Opinion

This opinion is based on the information contained in the following documents:

- 1. GeoEngineers, 2012. Request for No Further Action Determination, Former Redmond Shopping Square, 161st Avenue NE between Cleveland Street and Redmond Way, Redmond, Washington. March 20.
- 2. GeoEngineers, 2011. Final Soil Cleanup Report, City of Redmond 161st Avenue NE Extension, Former Redmond Shopping Square, 161st Avenue NE between Cleveland Street and Redmond Way, Redmond, Washington. February 16.
- 3. GeoEngineers, 2009. Supplemental Site Assessment, Redmond Shopping Square, Future 161st Avenue NE Extension between Cleveland Street and Redmond Way, 16101-16149 NE Redmond Way, Redmond, Washington. August 17.
- 4. GeoEngineers, 2007. Phase I and II Environmental Site Assessment, Redmond Shopping Square, Future 16119 NE Redmond Way, Redmond, Washington. October 26.

Ms. Elaine Dilley June 20, 2012 Page 3

Those documents are kept in the Central Files of the Northwest Regional Office of Ecology (NWRO) for review by appointment only. You can make an appointment by calling the NWRO resource contact at (425) 649-7235 or sending an email to nwro_public_request@ecy.wa.gov.

This opinion is void if any of the information contained in those documents is materially false or misleading.

Analysis of the Cleanup

Ecology has concluded that **no further remedial action** is necessary to clean up contamination at the Site. That conclusion is based on the following analysis:

1. Characterization of the Site.

Ecology has determined your characterization of the Site is sufficient to establish cleanup standards and select a cleanup action. The Site is described above and in **Enclosure A**.

Ground water in four monitoring wells on the Property (MW088, MW089, MW343 and MW344) was sampled in 2007, 2008 and 2009 and in four consecutive quarters in 2011. Monitoring wells MW088 and MW089 are downgradient of the former dry cleaner location. The 2011 quarterly samples yielded PCE at concentrations below Method A cleanup levels. Related PCE degradation products including trichloroethylene (TCE), (cis)1,2-dichloroethene and vinyl chloride were not ever detected in any of the monitoring wells with the exception of TCE at a concentration below the Method A cleanup level in MW343 in February 2011.

2. Establishment of cleanup standards.

a. Cleanup levels.

Soil:

The Site is located in a commercial area. Soil cleanup levels suitable for unrestricted land uses are therefore applicable to this Site.

Soil cleanup levels protective of terrestrial species are also potentially applicable. However, they were deemed not-applicable for this Site based on the exclusion relating to proximity of undeveloped land in accordance with WAC 173-34-7491(1)(c)(i).

Because the cleanup at this Site was relatively straightforward and involved few hazardous substances, the MTCA Method A cleanup levels for unrestricted land uses
were deemed applicable and appropriate. Note that the Method A cleanup levels for soil were established based on protection of groundwater and direct contact.

Groundwater:

Cleanup levels were set for groundwater based on its use as a potential drinking water source. The MTCA Method A cleanup levels have been applied to the identified contaminants listed above.

b. Points of compliance.

Soil:

The point of compliance for soil is throughout the Site in order to protect against direct contact and ground water.

Groundwater:

The standard point of compliance for groundwater is throughout the Site from the uppermost level of the saturated zone extending vertically to the lowest most depth which could potentially be affected by the Site.

3. Selection of cleanup action.

Ecology has determined the cleanup action you selected for the Site **meets** the substantive requirements of MTCA for the following contamination at the Site:

- Heavy oil-range petroleum hydrocarbon in soil.
- PCE in soil.

Although the detected PCE and petroleum hydrocarbon concentrations in soil on the Property were less than their corresponding cleanup levels, the City decided to remove accessible PCE and petroleum contaminated soil to the extent practical to improve groundwater quality beneath the Property, and reduce exposure to contaminated soil through direct contact during any future earth work. The cleanup action selected was excavation and off-site disposal of contaminated soil and in-situ treatment using hydrogen release compound (HRC).

4. Cleanup.

Ecology has determined the cleanup you performed meets the following cleanup standards:

- Heavy oil-range petroleum hydrocarbon in Soil.
- PCE in Soil and Ground Water.

Remedial actions completed at the Site have included the excavation of soil with detectable PCE concentrations in the former dry cleaner area. The dimensions of the excavation were 55 feet by 55 feet and 13 to 15 feet deep. Approximately 2,660 tons of PCE-contaminated soils were excavated and transported to the Waste Management Greater Wenatchee Landfill for disposal. However, the excavation of PCE contaminated soil was limited due to proximity to roadway and utilities.

According to the data collected for PCE-contaminated soils that remain in place at the Property, the concentration is likely to be below the cleanup level. Following completion of the excavation, approximately 50 gallons of HRC were applied to the bottom of excavation prior to backfilling to support biological degradation.

In addition, excavation was also conducted in some localized areas as described below:

- Approximately 95 tons of petroleum-contaminated soil was excavated in the vicinity of the former used oil ASTs area. The excavation was 25 feet by 20 feet and reached to maximum depth of approximately five feet bgs. The excavated soil was transported and disposed of at CEMEX in Everett.
- Approximately 48 tons of soil was excavated in the northern portion of the Property as shown on the attached Site diagram, where fill soil indicated possible contamination, from odor, staining or debris. The excavation was 25 feet by 10 feet and reached a maximum depth of approximately 10 feet bgs. The excavated soil was transported and disposed of at CEMEX in Everett.
- Approximately eight tons of petroleum-contaminated soil was excavated in the vicinity of MW087. The excavation was five feet by five feet and reached a maximum depth of approximately eight feet bgs. The excavated soil was transported and disposed of at CEMEX in Everett.
- Since peat was found to be unsuitable for use as road subgrade, peat beneath the planned roadway project was excavated and transported off-site for disposal.

Results from confirmation soil sampling showed that contaminants of concern were either not detected or detected but below their cleanup levels. Ecology has determined the cleanup you performed meets the cleanup standards established for the Site.

Ground water in four monitoring wells on the Property (MW088, MW089, MW343 and MW344) was sampled in 2007, 2008 and 2009 and in four consecutive quarters in 2011.

Monitoring wells MW088 and MW089 are located downgradient of the former dry cleaner location. The 2011 quarterly samples yielded PCE at concentrations below Method A cleanup levels. Related PCE degradation products including trichloroethylene (TCE), (cis)1,2-dichloroethene and vinyl chloride were not ever detected in any of the monitoring wells with the exception of TCE at a concentration below the Method A cleanup level in MW343 in February 2011.

Listing of the Site

Based on this opinion, Ecology will initiate the process of removing the Site from our lists of hazardous waste sites, including:

Confirmed and Suspected Contaminated Sites List

That process includes public notice and opportunity to comment. Based on the comments received, Ecology will either remove the Site from the applicable lists or withdraw this opinion.

Limitations of the Opinion

1. Opinion does not settle liability with the state.

Liable persons are strictly liable, jointly and severally, for all remedial action costs and for all natural resource damages resulting from the release or releases of hazardous substances at the Site. This opinion **does not**:

- Resolve or alter a person's liability to the state.
- Protect liable persons from contribution claims by third parties.

To settle liability with the state and obtain protection from contribution claims, a person must enter into a consent decree with Ecology under RCW 70.105D.040(4).

2. Opinion does not constitute a determination of substantial equivalence.

To recover remedial action costs from other liable persons under MTCA, one must demonstrate that the action is the substantial equivalent of an Ecology-conducted or Ecologysupervised action. This opinion does not determine whether the action you performed is substantially equivalent. Courts make that determination. *See* RCW 70.105D.080 and WAC 173-340-545.

3. State is immune from liability.

The state, Ecology, and its officers and employees are immune from all liability, and no cause of action of any nature may arise from any act or omission in providing this opinion. *See* RCW 70.105D.030(1)(i).

Termination of Agreement

Thank you for cleaning up the Site under the Voluntary Cleanup Program (VCP). This opinion terminates the VCP Agreement governing this project (#NW 2415).

For more information about the VCP and the cleanup process, please visit our website: <u>www.</u> <u>ecy.wa.gov/programs/tcp/vcp/vcpmain.htm</u>. If you have any questions about this opinion or the termination of the Agreement, please contact me by phone at (425) 649-7064 or e-mail at hvic461@ecy.wa.gov.

Sincerely,

Heathering

Heather Vick, LHg Toxics Cleanup Program

Enclosures (1): A – Description and Diagrams of the Site

cc: Tony Orme, GeoEngineers Sonia Fernandez, VCP administrator, Department of Ecology Dolores Mitchell, Financial Manager, Department of Ecology

Enclosure A

Description and Diagrams of the Site

Site Description

Site: The Site comprises PCE releases to soil and groundwater, and petroleum hydrocarbon releases to soil at the former Redmond Shopping Square property located at 16119 NE Redmond Way in Redmond, Washington (the Property). The Property and the Site are shown on the attached Site Map.

Area Description: The Property is situated in the downtown area of the City of Redmond (City). The area is completely developed and dominated by commercial land use however some residential condominiums have also recently been constructed. Most surfaces are paved or covered by buildings.

Property History and Current Use: The Property is approximately 1.68 acres in size. It was originally developed in 1955 as a one-story retail strip mall building with a paved parking lot. The building was occupied by various businesses, including a dry cleaner, paint store, auto parts store and a restaurant.

The City purchased the Property in 2008, and the existing building was demolished in 2010. The City is currently redeveloping the Property for the 161st Avenue Northeast Extension project.

Sources of Contamination: Potential contamination sources consist of leaks and spills associated with the historical operations on the Property, including the former dry cleaner and auto parts store.

Physiographic Setting: The Site and surrounding area is located within the Sammamish River floodplain. The Site is at an elevation of approximately 40 feet above mean sea level.

Surface/Storm Water System: Surface water runoff in the area is collected in municipal storm drains and eventually discharges to the Sammamish River, which is located approximately 1,300 feet to the southwest.

Ecological Setting: There is little terrestrial habitat in the immediate vicinity of the Property. The area is heavily developed, with most surfaces paved or covered by buildings.

Geology: Soil encountered beneath the Property generally consists of sand with varying amounts of gravel which is Quaternary-aged alluvium to 25 feet below the ground surface (bgs), the maximum depth explored. Peat was present beneath the parking lot at depths of three to five feet below the ground surface and extending to approximately 11 feet bgs.

Groundwater: Ground water occurs as a shallow water table aquifer on the Site. The depth to groundwater is approximately nine to 17 feet bgs, and groundwater generally flows west-northwest. The Site is located in the City's Critical Aquifer Recharge Area in Wellhead Protection Zone 2. In Zone 2, ground water at the Site reaches the City's nearest drinking water well within a year or less.

Water Supply: The City provides drinking water for the area. The Property is located within the City's Wellhead Protection Zone.

Soil and Groundwater Contamination: Soil and groundwater were impacted at the Property as described below.

• Former dry cleaner area: This portion of the Site previously had elevated concentrations of PCE in soil in the southwest portion of the Property in the vicinity of the former dry cleaner. The PCE concentrations were all below the Method A soil cleanup level however the City opted to remove accessible PCE-impacted soil to the extent practical. A total of approximately 1,512 inplace cubic yards (2,660 tons) was removed and transported to Waste Management's Great Wenatchee Landfill in Wenatchee, Washington.

Groundwater was also impacted by PCE with intermittent exceedences, slightly above the cleanup level. PCE has been consistently detected in shallow groundwater beneath the Property at low concentrations similar to the concentrations detected throughout downtown Redmond during other studies which indicates possible off-Property sources may also contribute to PCE contamination beneath the Property. However, the PCE concentrations were slightly higher in the vicinity of the former dry cleaner which was located in the southwestern portion of the Property. However, at this time, there is no information regarding any off-Property PCE sources.

Ground water in four monitoring wells on the Property (MW088, MW089, MW343 and MW344) was sampled in 2007, 2008 and 2009 and in four consecutive quarters in 2011. Monitoring wells MW088 and MW089 are downgradient of the former dry cleaner location. The 2011 quarterly samples yielded PCE at concentrations below Method A cleanup levels. Related PCE degradation products including trichloroethylene (TCE), (cis)1,2-dichloroethene and vinyl chloride were not ever detected in any of the monitoring wells with the exception of TCE at a concentration below the Method A cleanup level in MW343 in February 2011.

• Former auto parts store: This portion of the Site previously had elevated concentrations of heavy oil-range petroleum hydrocarbons in shallow soil in the vicinity of the former waste oil ASTs. The concentrations were below the Method A cleanup level.

In addition, metals and PAHs were detected in subsurface soil within the upper 2.5 feet in the boring drilled for MW087 located in the former parking lot. However, concentrations of these contaminants were all below their corresponding clean up levels. Fill soil with physical indications of contamination, such as odor, staining and debris was encountered during construction activities in the northern portion of the Property.

Ground water samples collected from Property monitoring wells MW087 (later decommissioned), MW088 and MW089 yielded non-detectable levels of petroleum hydrocarbons in 2007. Petroleum hydrocarbons were not included in subsequent site characterization activities.

Site Diagrams





Barry



STATE OF WASHINGTON DEPARTMENT OF ECOLOGY

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August 14, 2014

Mr. Thomas Markl Nelson Real Estate Management LLC 16508 NE 79th Street Redmond, WA 98052

RE: No Further Action at the Following Site:

Site Name:	Nelgroup Properties, LLC
Site Address:	15946 & 15960 Northeast Redmond Way, Redmond, WA
Facility/Site No:	281
VCP Project No:	NW2693

Dear Mr. Markl:

The Washington State Department of Ecology (Ecology) received your request for an opinion on your independent cleanup of the Nelgroup Properties LLC facility (Site). This letter provides our opinion. We are providing this opinion under the authority of the Model Toxics Control Act (MTCA), Chapter 70.105D RCW.

Issue Presented and Opinion

Is further remedial action necessary to clean up contamination at that Site? NO

Ecology has determined that No Further Remedial Action (NFA) is necessary to clean up contamination at the Site.

This opinion is based on an analysis of whether the remedial action meets the substantive requirements of MTCA, Chapter 70.105D RCW, and its implementing regulations, Chapter 173-340 WAC (collectively "substantive requirements of MTCA") The analysis is provided below.

Description of the Site

This opinion applies only to the Site described below. The Site is defined by the nature and extent of contamination associated with the following releases.

The Site is defined by the nature and extent of contamination associated with the following releases:

- · Tetrachlorethylene into the Soil.
- Tetrachlorethylene Groundwater.
- Tetrachlorethylene into indoor air.

Enclosure A includes a detailed description and diagram of the Site, as currently known to Ecology.

Mr. Thomas Markl August 14, 2014 Page 2

Please note the Redmond Shopping Square Property facility (VCP # NW2415) also affects parcel(s) of real property associated with this Site. This opinion does not apply to any contamination associated with the Redmond Shopping Square Property. Ecology issued a No Further Action (NFA) decision for the site associated with (VCP# NW2415) on June 20, 2012. Please refer to **Enclosure A** for Redmond Shopping Square Property facility. Also, the Site is located on the Redmond Center Property for which a property specific NFA for the Cleaning Center of Redmond (VCP # NW1324) was issued on April 1, 2011. This opinion does not apply to any contamination associated with (VCP# NW1324). Please refer to **Enclosure A** for Cleaning Center of Redmond property.

Basis of the Opinion

This opinion is based on the information contained in the following documents:

- 1. Groundwater Monitoring Results for opinion Nelgroup Properties LLC Site, Farallon Consultants, May 16, 2014.
- 2. Summary of Cleanup Actions Nelgroup Properties, Farallon Consultants, April 26, 2013.
- 3. Voluntary Cleanup Program Request for Assistance, Redmond Center Property, Farallon Consultants, January 23, 2013.
- 4. Ecology Site file for VCP # NW 2415.
- 5. Ecology Site file for VCP# NW 1324.

Those documents are kept in the Central Files of Northwest Regional Office (NWRO) of Ecology for review by appointment only. You can make an appointment by calling the NWRO resource contact at 425-649-7239.

This opinion is void if any of the information contained in those documents in materially false or misleading.

Analysis of the Cleanup

Ecology has concluded that **no further action** is necessary to cleanup contamination at the Site. That conclusion is based on the following analysis:

1. Characterization of the Site.

Ecology has determined your characterization of the Site insufficient to establish cleanup standards and select a cleanup action. The Site is described above and in **Enclosure A**.

The Site has been characterized for Tetrachlorethylene in soil, groundwater, sub slab soil vapor and indoor air. The results of characterization are depicted in **Enclosure A** and described in **Enclosure A**.

Mr. Thomas Markl August 14, 2014 Page 3

2. Establishment of cleanup standards.

a. Cleanup levels.

Ecology has determined the cleanup levels and points of compliance you established for the Site meet the substantive requirements of MTCA.

The cleanup levels are as follows:

Tetrachlorethylene Groundwater:	5 ug/l
Tetrachlorethylene into the Soil:	0.05 mg/kg
Tetrachlorethylene into indoor air:	9.6 ug/m ³

The Groundwater cleanup level is for the beneficial use of drinking water. The Soil level is for the protection of Groundwater for the beneficial use of Groundwater. The indoor air level is protective of human health from indoor air via the soil vapor pathway.

b. Compliance points

Standard compliance points are as followed:

Soil: From the ground surface to the uppermost Groundwater.

Groundwater: From the uppermost level of the saturated zone Extending vertically to the lowermost depth, which could potentially be affected by the Site.

Indoor Air: Though the breathing zone of the building(s) on Site.

3. Selection of cleanup action.

Ecology has determined the cleanup you selected for the Site meets the substantive requirements of MTCA. The cleanup meets the minimum cleanup requirements and does not exacerbate conditions or preclude reasonable cleanup alternatives elsewhere at the Site.

Natural attenuation of soil and groundwater meet the minimum requirements of WAC 173-340-360 (2) by providing a permanent solution to the extent practicable. Please refer to document No. 1 above for natural attenuation report.

The sub slab depressurization system has protects the indoor air pathway by mitigating soil vapor derived from the contaminant releases to the subsurface. Please refer to document No. 1 for the depressurization report.

Mi Thomas Markl August 14, 2014 Page 4

4. Cleanup.

Natural attenuation of soil and groundwater is established by four consecutive quarters of groundwater below the cleanup level. Please refer to Enclosure A.

A sub slab depressurization system was installed in December 2009 and remains in operation. Indoor air is demonstrated to be below the cleanup level. The depressurization system can be terminated upon receipt of this letter. Please refer to **Enclosure A**.

Listing of the Site

Based on this opinion, Ecology will initiate the process of removing the Site from our lists of hazardous waste sites, including:

Hazardous Sites List. Confirmed and Suspected Contaminated Sites List.

Limitations of the Opinion

1. Opinion does not settle liability with the state.

Liable persons are strictly liable, jointly and severally, for all remedial action costs and for all natural resource damages resulting from the release or releases of hazardous substances at the Site. This opinion **does not**:

- Resolve or alter a person's liability to the state.
- Protect liable persons from contribution claims by third parties.

To settle liability with the state and obtain protection from contribution claims, a person must enter into a consent decree with Ecology under RCW 70.105D.040(4).

2. Opinion does not constitute a determination of substantial equivalence.

To recover remedial action costs from other liable persons under MTCA, one must demonstrate that the action is the substantial equivalent of an Ecology conducted or Ecology-supervised action. This opinion does not determine whether the action you performed is substantially equivalent. Courts make that determination. *See* RCW 70.105D.080 and WAC 173-340-545.

3. State is immune from liability.

The state, Ecology, and its officers and employees are immune from all liability, and no cause of action of any nature may arise from any act or omission in providing this opinion. See RCW 70.105D.030(1)(i).

Termination of Agreement

Thank you for cleaning up the Site under the Voluntary Cleanup Program (VCP). This opinion terminates the VCP Agreement governing this project # NW2693.

Mr. Thomas Markl August 14, 2014 Page 5

For more information about the VCP and the cleanup process, please visit our web site: <u>www.ecy.wa.gov/programs/tcp/vcp/vcpmain.htm</u>. If you have any questions about this opinion or the termination of the Agreement, please contact me at 360-407-7239 or mkun461@ecy.wa.gov.

Sincerely,

Michael Kuntz PHG., PG. HQ-Toxics Cleanup

Enclosures:

A - Description and Diagrams of the Site

cc: Brani Jurista, Farallon Consultants Dolores Mitchell, Ecology

Enclosure A

Description and Diagrams of the Site, Relevant Properties, and Sources.

The Site is located in the southeastern portion of the Redmond Center Property. The site contains the 15946 Redmond Way building is a masonry slab-on-grade structure built in 2009 and located on the northwest corner of the intersection of Redmond Way and 160th Avenue Northeast. The irregular-shape building roughly 70 by 190 feet consists of approximately 13,500 square feet of single story retail space that is surrounded by concrete walkways and an asphalt-paved parking area north of the building. Currently the building is occupied by two restaurants and four retailers, including a bank, a candy shop, a dentist office, and a pet store. Please refer to Exhibit No. 1 for the Site.

The Redmond Center Property (King County Tax Assessor Parcel No. 7198900080) is 6.93 acres in size, zoned commercial, and developed with two single-story commercial strip mall masonry buildings, a single-story commercial wood-frame building, and associated parking lot. Please refer to Exhibit No. 1 for the Redmond Center Property.

The Redmond Shopping Center Property is located approximately 250 feet upgradient from the Redmond Center Property. Please refer to Exhibit No. 1 for Redmond Shopping Center Property.

Exhibit No. 1: Map of site, relevant properties, and sources.

Exhibit No. 2: Construction drawing for Monitoring Well No. 11

Exhibit No. 3: Construction drawing for Monitoring Well No. 10

Exhibit No. 4: Groundwater Elevation Measurements for Monitoring Well No. 11

Exhibit No. 5: Groundwater Monitoring Data for Monitoring Well Nos. 10 and 11

Exhibit No. 6: Plan view of the sub-slab depressurization system

Exhibit No. 7: Diagrams of the sub-slab depressurization system

Exhibit No. 8: Sub Slab Analytical Results



Lo	g o	t E	sorir	ng:	IVIVV-11		F	Page 1 of 1
Issaguan, washington you? NREM, LLC Redmond Center Redmond, WA PN: 650-007 Date/Time Started: 12/30/09 1015 Date/Time Completed: 12/30/09 1035 Equipment: LA HSA Drilling Company: CDI Drilling Method:				Sampler Type:18" Split SpoonDrive Hammer (lbs.):340Depth of Water ATD (ft bgs):12Total Boring Depth (ft bgs):20Total Well Depth (ft bgs):20				n 340 12 20 20
nscs	USGS Graphic	% Recovery	Blow Counts 8/8/8	PID (ppm)	Sample ID	Sample Analyzed	Bo Cor I	ring/Well astruction Details
								Concrete
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e to SW		100	22 / 50 for 6	0.0				∑ Sand Pac
SW	r - 1000	100	20 / 50 for 4	0.0				Screen
n, SW	/	100	30 / 50 for	0.0				
	e to SW	LUG U arted: 12/30 mpleted: 12/30 LA HS any: CDI nan: Curtis od: HSA	LOG UT E	arted: 12/30/09 1015 mpleted: 12/30/09 1035 LA HSA vany: CDI nan: Curtis Askew od: HSA sg: sg: sg: sg:	Image: LOG OI DOI ING. arted: 12/30/09 1015 Sam impleted: 12/30/09 1035 Driv LA HSA Dep pany: CDI Tota nan: Curtis Askew Tota od: HSA Mage: Sign Sign Sign Sign Sign Sign Sign Sign	Inted: 12/30/09 1015 mpleted: Sampler Type: 18 Drive Hammer (lbs Depth of Water AT Total Boring Depth Total Boring Depth Total Well Depth (f So So S	arted: 12/30/09 1015 mpleted: Sampler Type: 18" Spl Drive Hammer (lbs.): hany: CDI Total Boring Depth (fb br Total Well Depth (ft br Depth of Water ATD (fl brow Hammer (lbs.): nan: Curtis Askew Total Well Depth (ft br Total Well Depth (ft br Depth of Water ATD (fl brow Hammer (lbs.): g: HSA ison of the transmitted in the transmitted	LOG OI DOTTING. IVIVE-11 F inted: 12/30/09 1015 LA HSA Depth of Water ATD (ft bgs): LA HSA Depth of Water ATD (ft bgs): Total Boring Depth (ft bgs): Total Well Depth (ft bgs): ann: Curtis Askew Depth of Water ATD (ft bgs): Total Well Depth (ft bgs): Depth of Water ATD (ft bgs): Total Well Depth (ft bgs): d: HSA g g

ent: ojec cati callo	Nelson Real Estate Mngmnt :t: Cleaning Center of Redmond on: Redmond, WA on PN: 650-001 ed By: D. Clement	Date/Time Started Date/Time Comple Equipment: Drilling Company: Drilling Foreman: Drilling Method:	l: eted: :	06/20 06/20 CME Casc Jame Hollo	/07 /07 75 ade s Go w St	0745 0930 Drilling oebel em Auge	Sam Driv Dep Tota Tota	pler Type: D& e Hammer (Ibs th of Water ATI I Boring Depth I Well Depth (fi	&M S .): D (ft b (ft b t bgs	S 18"x bgs): ıgs): ;):	2" 300 16.5 26.5 25
Sample Interval	Lithologic Descript	ion	uscs	USGS Graphic	% Recovery	Blow Counts 8/8/8	PID (units)	Sample ID	Sample Analyzed	Bo Cor	ring/We nstructio Details
X	5'-6.5' SAND, fine to coarse, with fine to coarse gra medium dense, moist, no odor 10'-11.5' SAND, fine to coarse, minor fine gravel ar brown, medium dense, molst, no odor	ivel, light brown, nd silt, dark reddish-	sw		100 100	12/15/16	673	MW10-6 MW10-11			Casing Bentoni
	Sampler broke in boring, drill to 25 feet below grou	nd surface.									Screen
X	25'-26.5' SAND, fine to coarse, mostly coarse, min medium dense, wet, no odor	or silt, dark brown,	SP		50	14/16/16	81.0	MW10-26			

Exhibit No. 4

Table 1Summary of Groundwater Elevation MeasurementsRedmond Center PropertyRedmond, WashingtonFarallon PN:650-009

Well Identification	Date	Top of Well Casing Elevation (feet) ¹	Depth to Water (feet) ²	Groundwater Elevation (feet) ¹
	1/22/2010	39.28	10.77	28.51
	10/26/2011		13.82	25.46
MW-11	6/17/2013		13.89	25.39
NI W-II	9/13/2013		14.52	24.76
	12/11/2013		13.01	26.27
	3/18/2014		11.15	28.13

NOTES:

¹ In feet above mean sea level.

² In feet below top of casing.

Exhibit No. 5

Table 2 Groundwater Analytical Results for Monitoring Wells MW-10 and MW-11 Redmond Center Property Redmond, Washington Farallon PN: 650-007

· · · · · · · · · · · · · · · · · · ·		2	Analytical Results (micrograms per liter) ¹					
Well Identification	Sample Identification	Sample Date	Tetrachloroethene	Trichloroethene	cis-1,2-Dichloroethene	Vinyl Chloride		
	MW10-GW062207	6/22/2007	7.4	0.48	<0.20	<0.20		
MW-10 ²	MW10-051608	5/16/2008	6.4	0.37	<0.20	<0.20		
(Well Decommissioned)	MW11-111208	11/12/2008	11	0.91	0.33	<0.20		
	MW-10-021309	2/13/2009	15	2.0	0.57	<0.20		
	MW11-012210	1/22/2010	2.0	<0.20	<0.20	<0.20		
	MW11-102611	10/26/2011	1.6	<0.20	<0.20	<0.20		
A 4147 4 4	MW-11-061713	6/17/2013	1.6	<0.20	<0.20	<0.20		
MW-11	MW-11-091313	9/13/2013	1.6	<0.20	<0.20	<0.20		
	MW-11-121113	12/11/2013	1.7	<0.20	<0.20	<0.20		
	MW-11-031814	3/18/2014	1.0	<0.20	<0.20	<0.20		
MTCA Cleanup Levels for	Groundwater ³		5	5	164	0.2		

NOTES:

< indicates analyte not detected at or above the laboratory practical quantitation limit shown.

⁴ Analyzed by U.S. Environmental Protection Agency Method 8260B or 8260C.

² Monitoring well MW-10 decommissioned on February 16, 2009 as part of the Redmond Center redevelopment project.

³Washington State Model Toxics Control Act Cleanup Regulation (MTCA) Method A Cleanup Levels for Groundwater, Table 720-1 of Section 900 of Chapter 173-340 of the Washington Administrative Code, as revised November 2007.

⁴Washington State Model Toxics Control Act Cleanup Regulation Cleanup Levels and Risk Calculations, Standard Method B Values for Groundwater, https://fortress.wa.gov/ecy/clarc/Reporting/ChemicalQuery.aspx.





Table 1 Sub-Slab Soil Gas Analytical Results for PCE, TCE, and Vinyl Chloride Redmond Center Property Redmond, Washington Farallon PN: 650-007

			Analytical Results (micrograms per cubic meter) ¹					
Sample Location	Sample Identification	Sample Date	PCE	TCE	Vinyl Chloride			
Bank Vault	FAR-1-917	1/26/2012	45	0.52	1.0			
Bank Vault	FAR-34086-051712	5/17/2012	100	<0.20	1.3			
ified MTCA Method	B Screening Levels for Soil	Gas (Commercial)	501.7 ^{2,3}	19.4 ^{2,3}	14.7 ²			

NOTES:

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

PCE = tetrachloroethene TCE = trichloroethene

¹Analyzed by U.S. Environmental Protection Agency (EPA) Method TO-15.

² Washington State Model Toxics Control Act Cleanup Regulation (MTCA) Method B Soil Gas Screening Levels for Indoor Air modified for commercial setting. Calculations are shown in Table 2 of this letter report.

³ Modified MTCA Method B Soil Gas Screening Levels based on forthcoming changes to be presented in an update to the Cleanup Levels and Risk Calculations (CLARC) database. These changes are based on February 2012 updates to the EPA Integrated Risk Information System (IRIS) database regarding toxicological data for these compounds.

1 of 1

APPENDIX B SITE CLOSURE REPORT

SITE CLOSURE REPORT ADDENDUM Former Cleaning Center of Redmond 15796 Redmond Way Redmond, Washington

Farallon PN: 650-001



975 5th Avenue Northwest, Issaquah, Washington 98027 Tel· (4.25) 295-0800 Fax. (4.25) 295-0850 www.farallonconsulting com

SITE CLOSURE REPORT

CLEANING CENTER OF REDMOND 15796 REDMOND WAY REDMOND, WASHINGTON VOLUNTARY CLEANUP PROGRAM NO. NW1324

> Submitted by: Farallon Consulting, L.L.C. 975 5th Avenue Northwest Issaquah, Washington 98027

> > Farallon PN: 650-001

For: Nelson Real Estate Management LLC P.O. Box 461 Redmond, Washington 98073-0461

September 21, 2007

Prepared by: Jennifer roiect

Reviewed by:

"Mord T. Summet Clifford T. Schmitt, L.G., L.H.G.

Principal



Quality Service for Environmental Solutions



TABLE OF CONTENTS

ACRO	ONYMS	S AND ABBREVIATIONS	iii
1.0	INTR	ODUCTION	1-1
	1.1	OBJECTIVE	1-1
	1.2	REPORT ORGANIZATION	1-2
2.0	ВАСК	GROUND	2-1
	2.1	SITE DESCRIPTION	2-1
	2.2	PREVIOUS INVESTIGATIONS	2-1
	2.3	GEOLOGY AND HYDROGEOLOGY	2-3
3.0	SITE	CLOSURE ACTIVITIES	3-1
	3.1	SCOPE OF WORK FOR SITE CLOSURE ACTIVITIES	3-1
	3.2	SOIL ASSESSMENT AND MONITORING WELL INSTALLATION	3-1
		3.2.1 Former Redmond One Hour Cleaners	3-3
		3.2.2 Cleaning Center of Redmond	3-3
		3.2.3 Redmond Center	3-3
	3,3	GROUNDWATER SAMPLING	3-4
		3.3.1 Confirmation Groundwater Monitoring Event	3-4
		3.3.2 Groundwater Assessment	3-5
	3.4	INDOOR AIR SAMPLE COLLECTION	3-5
4.0	RESU	ILTS	4-1
	4.1	SOIL	4-1
		4.1.1 Former Redmond One Hour Cleaners	4-1
		4.1.2 Cleaning Center of Redmond.	4-I
		4.1.3 Redmond Center	4-1
	4.2	GROUNDWATER	4-2
		4.2.1 Confirmation Groundwater Monitoring Event	4-2
		4.2.2 Groundwater Assessment	4-2
	4,3	INDOOR AIR	. 43
5.0	CON	CLUSIONS	5-1
	5.1	FORMER REDMOND ONE HOUR CLEANERS.	5-1
	5.2	CLEANING CENTER OF REDMOND	5-1
	5.3	SOUTHEASTERN PORTION OF REDMOND CENTER	. 5-2
	5.4	SUMMARY	. 5-3
6.0	REFE	CRENCES	. 6-1
7.0	LIMI	TATION	. 7-1



FIGURES

- Figure 1 Site Location Map
- Figure 2 Soil Sample Locations and Analytical Results
- Figure 3 Groundwater Elevation Contours and PCE Concentrations in Groundwater for May 15, 2007
- Figure 4 Indoor Air Sampling Locations and Analytical Results

TABLES

- Table 1
 Summary of Soil Sample Analytical Results HVOCs
- Table 2Summary of Groundwater Elevations
- Table 3
 Summary of Groundwater Sample Analytical Results -- HVOCs
- Table 4
 Summary of Indoor Air Sample Results

APPENDICES

- Appendix A Boring Logs
- Appendix B Laboratory Analytical Reports



ACRONYMS AND ABBREVIATIONS

bgs	below ground surface
DOH	Washington State Department of Health
Ecology	Washington State Department of Ecology
EPA	U.S. Environmental Protection Agency
Farallon	Farallon Consulting, L.L.C.
HVOCs	halogenated volatile organic compounds
mg/kg	milligrams per kilogram
μg/l	micrograms per liter
$\mu g/m^3$	micrograms per cubic meter
MTCA	Washington State Model Toxics Control Act Cleanup Regulation
NIOSH	National Institute for Occupational Safety and Health
OSHA	Occupational Safety and Health Administration
PCE	tetrachloroethene
PEL	permissible exposure limit
Phase II ESA	Phase II Environmental Site Assessment
PID	photoionization detector
PQLs	practical quantitation limits
QA/QC	Quality Assurance/Quality Control
REL	recommended exposure limit
Site	Cleaning Center of Redmond facility, 15796 Redmond Way, Redmond, Washington
SVE	soil vapor extraction
TCE	trichloroethene
WAC	Washington Administrative Code
Work Plan	Site Closure Work Plan, Cleaning Center of Redmond, 15796 Redmond Way, Redmond, Washington dated November 22, 2006, prepared by Farallon



1.0 INTRODUCTION

Farallon Consulting, L.L.C. (Farallon) has prepared this Site Closure Report to document the results of various investigations conducted in 2007 at the Redmond Center property, which includes the Cleaning Center of Redmond facility located at 15796 Redmond Way in Redmond, Washington (herein referred to as the Site) (Figure 1). The investigations were conducted in accordance with the *Site Closure Work Plan*, *Cleaning Center of Redmond*, 15796 Redmond Way, Redmond, Washington dated November 22, 2006, prepared by Farallon (2006c) (Work Plan), and the Washington State Model Toxics Control Act Cleanup Regulation (MTCA), as established in Chapter 173-340 of the Washington Administrative Code (WAC 173-340), as amended February 12, 2001. Work at the Site is being conducted as an independent cleanup action under the Washington State Department of Ecology (Ecology) Voluntary Cleanup Program. The Site was assigned Identification Number NW1324 by Ecology.

1.1 **OBJECTIVE**

The objective of the Site closure activities was to address specific data gaps and to conduct confirmation sampling necessary to achieve regulatory closure for the Site. A release of the dry cleaning solvent tetrachloroethene (PCE) was confirmed at the Site in 1999, and a remediation system was installed at the Site in 2003 to address concentrations of halogenated volatile organic compounds (HVOCs) in soil and groundwater. Performance monitoring data collected at the Site in 2006 indicated that the remediation system was effective, and the prior release of PCE at the Cleaning Center of Redmond no longer represented a threat to human health or the environment.

Representatives of Ecology, Farallon, and Nelson Real Estate Management LLC, agent for Nelgroup Properties LLC, the owner of the Redmond Center property, attended a meeting on September 18, 2006 to discuss issues regarding the characterization of conditions at the Site that were raised by Ecology (2006) in a letter dated June 2, 2006. A letter dated September 27, 2006 prepared by Farallon (2006b) summarized the September 18 meeting, and listed several issues that Ecology requested be further investigated prior to consideration of the Site for regulatory closure, including:

- Soil conditions at the location of the former Redmond One Hour Cleaners, which was located in the eastern portion of the current QFC grocery store;
- Soil conditions in the vicinity of the former dry cleaning machine at the Cleaning Center of Redmond facility to confirm that soil met the cleanup levels;
- Evaluation of HVOCs in groundwater at the southeastern corner of the Redmond Center property;
- Groundwater quality at the point of compliance wells for the Site to confirm that groundwater met the cleanup levels; and
- Indoor air down-gradient of the Cleaning Center of Redmond facility to assess the potential for the soil vapor pathway to impact indoor air quality.



The investigations conducted by Farallon in 2007 addressed each of these issues. The scope and results of the investigations are presented in this Site Closure Report.

1.2 REPORT ORGANIZATION

This report summarizes background information for the Site and presents the results of the investigations conducted in 2007. This report is organized into seven sections:

Section 1 - Introduction. This section presents an overview and the objective of the Site closure activities.

Section 2 – Background. This section presents a description of the Site features, history, geology, and hydrogeology; and a summary of previous investigations conducted at the Site.

Section 3 – Site Closure Activities. This section presents the scope of work and field activities for the various investigations conducted in 2007.

Section 4 – Results. This section presents the results of the Site Closure activities.

Section 5 – Conclusions. This section presents Farallon's conclusions pertaining to the Site Closure activities.

Section 6 – References. This section lists the documents cited in this Site Closure Report.

Section 7 – Limitation. This section presents Farallon's standard limitation.



2.0 BACKGROUND

The following subsections provide a description of the Site, a summary of the previous investigations conducted at the Site by Farallon and others, and the Site geology and hydrogeology. The information summarized in this section was obtained from reports prepared by various consultants referenced in Section 6, and from observations made by Farallon during the various investigation activities documented in this report.

2.1 SITE DESCRIPTION

The Site is located at 15796 Redmond Way in Redmond, Washington in a single-story, commercial strip mall of masonry construction (Figure 2). According to King County Tax Assessor records, the strip mall building was constructed in various stages from 1966 through the early 1980s (King County, Washington 2005). Several remodels have occurred since the early 1980s, with the most recent being a significant expansion near the western end of the strip mall building in 2002. Asphalt-paved parking areas with landscaping strips are located north and south of the Site building. The strip mall is bordered on the west by 158th Avenue South and on the east by 160th Avenue Northeast.

The Cleaning Center of Redmond has operated as a dry cleaning facility or dry cleaning drop-off facility from approximately 1990 to the present. In a January 2005 personal communication with Farallon, Ms. Carol Sarna, a business consultant with a long-term relationship with Nelgroup Properties LLC, stated that a steel pan for the containment of potential spills of PCE was placed beneath the dry cleaning machine at the Cleaning Center of Redmond in 1999 (Farallon 2005). Use of PCE was discontinued when the dry cleaning machine was removed in October 2002, at which time the facility became a drop-off-only location for dry cleaning. Regular laundry services are still performed at the Cleaning Center of Redmond.

According to the U.S. Geological Survey (1982) topographic map *Bellevue North, Washington* dated 1982, the Site is at an elevation of approximately 40 feet above mean sea level and is relatively flat. Regional topography in the vicinity slopes to the west. The Sammamish River is located approximately 600 feet west of the Site.

2.2 **PREVIOUS INVESTIGATIONS**

The environmental reports documenting the investigations at the Site that were reviewed by Farallon are listed in Section 6, References. A summary of the reports reviewed is provided below.

Alisto Engineering Group (1999) performed fieldwork at the Site in 1999 to assess whether a release of PCE from Site operations may have occurred. The assessment involved drilling four borings in the vicinity of the former Cleaning Center of Redmond dry cleaning machine to collect soil samples for laboratory analysis. A reconnaissance groundwater sample also was collected from one of the borings. The results of the assessment indicated that concentrations of PCE in soil and groundwater, and concentrations of trichloroethene (TCE) in groundwater at the



Site exceeded the MTCA Method A cleanup levels for soil and groundwater. The presence of PCE and TCE was attributed to releases from dry cleaning operations at the Site. Alisto Engineering Group did not perform an assessment of groundwater quality up-gradient of the Site to confirm that no other sources were affecting groundwater quality at the Site.

GeoEngineers, Inc. (2001) conducted a Phase II Environmental Site Assessment (Phase II ESA) at the Site in 2000 to further delineate the vertical and lateral extent of HVOCs exceeding the MTCA Method A cleanup levels in soil and groundwater. The Phase II ESA involved drilling 11 borings to collect soil and reconnaissance groundwater samples, and installing monitoring wells MW-1 through MW-8. Soil samples collected from two borings located south and east of the former Cleaning Center of Redmond dry cleaning machine contained concentrations of PCE exceeding 0.5 milligrams per kilogram (mg/kg). The distribution of HVOCs in groundwater was bounded to the north-northeast, south, and west of the Site. None of the monitoring wells or reconnaissance groundwater sampling points was located directly up-gradient of the Cleaning Center of Redmond to assess whether an off-Site source was contributing to groundwater contamination.

Farallon began monitoring groundwater conditions at the Site in December 2000 to document the trend of PCE concentrations over time, and to assess whether concentrations of PCE would decrease to below MTCA Method A cleanup levels through natural attenuation within a reasonable time frame. In 2003, monitoring wells MW-4 and MW-6 were decommissioned due to expansion of the strip mall building, and monitoring well MW-9 was installed in close proximity to the confirmed PCE source to replace monitoring well MW-4. Farallon conducted a total of 13 groundwater monitoring events between December 2000 and May 2007.

Farallon installed a soil vapor extraction (SVE) well through the concrete slab inside the Cleaning Center of Redmond in August 2003. The SVE well was installed to facilitate operation of an SVE system to remove concentrations of PCE in soil at the source area adjacent to the former location of the dry cleaning machine at the Cleaning Center of Redmond. It was anticipated that operation of the SVE system would eliminate or sufficiently decrease the flux of PCE from the source in the vadose (unsaturated) zone to groundwater, making active remediation of groundwater contamination unnecessary.

Since operation of the SVE system began at the facility in August 2003, concentrations of PCE in groundwater have declined. Concentrations of PCE in groundwater at the existing monitoring wells were below the MTCA Method A cleanup level for both the February and August 2006 monitoring events, prior to commencing the work described in the Work Plan.

Farallon (2005) conducted a limited subsurface investigation in December 2004 that consisted of advancing five direct-push borings at up-gradient and cross-gradient positions on the Site relative to the Cleaning Center of Redmond facility, and collecting reconnaissance groundwater samples from the boring locations. The locations of the borings are shown on Figure 4 of the Limited Subsurface Investigation Report (Farallon 2005). The limited subsurface investigation was conducted to assess whether an up-gradient, off-Site source was contributing to groundwater contamination at the Site. Reconnaissance groundwater samples were collected from depths ranging from 10 to 22 feet below ground surface (bgs) in the borings, and were analyzed for



HVOCs by U.S. Environmental Protection Agency (EPA) Method 8260B. The reconnaissance groundwater samples collected from two borings located at the southeastern corner of the Redmond Center property contained concentrations of PCE exceeding the MTCA Method A cleanup level. The reconnaissance groundwater analytical results suggest that a plume of PCE in groundwater emanating from an up-gradient off-Site source is present in the southern portion of the Redmond Center property.

Farallon (2006a) conducted an assessment of deep groundwater quality in August 2006 that was performed in response to the letter from Ecology dated June 2, 2006 that stated "the vertical extent of contamination, in particular tetrachloroethene, in groundwater above the cleanup level(s) has not been determined," among other opinions. The assessment of deep groundwater quality included collection of reconnaissance groundwater samples from hollow-stem auger boring FB-1, advanced down-gradient to monitoring well MW-7 to a depth of 70 feet bgs. Reconnaissance groundwater samples were collected from boring FB-1 at 12.5, 31.5, and 68.5 feet bgs during drilling. The reconnaissance groundwater samples were collected by advancing a temporary well point with a 3-foot screen in front of the auger at the desired sampling depth. Approximately three casing volumes of water was purged from each temporary monitoring well to remove sediment and debris and create a hydraulic connection between the well screen and the surrounding water-bearing zone. The analytical results for PCE in all three of the reconnaissance groundwater samples collected were reported to be below the MTCA Method A cleanup level of 5 micrograms per liter ($\mu g/l$) for PCE, indicating that concentrations of PCE in groundwater attenuate with depth (Figure 3).

2.3 GEOLOGY AND HYDROGEOLOGY

The Puget Sound region is underlaid by Quaternary sediments deposited during glacial episodes (Galster and Laprade 1991). Deposition occurred during a number of glacial advances and retreats, which created the existing subsurface conditions. The regional sediments consist primarily of interlayered and/or sequential deposits of alluvial clays, silts, and sands that typically are situated over deposits of glacial till that consist of silty sand to sandy silt with gravel. Outwash sediments consisting of sands, silts, clays, and gravels were deposited by rivers, streams, and post-glacial lakes during the glacial retreats. With the exception of the most recent recessional deposits, the outwash sediments have been over-consolidated by the overriding ice sheets.

Shallow soil encountered during Farallon's subsurface investigation activities in the vicinity of the Site consisted primarily of sand and gravel, with the exception of soil encountered northwest of the strip mall building. The shallow soil at this location included a layer of silt and peat from approximately 2.5 to 8 feet bgs. Underlying the silt and peat was sand and gravel consistent with the other boring locations.

The shallow aquifer appears to be unconfined and extends to a minimum depth of 70 feet bgs on the Site, based on Farallon's deep boring assessment conducted in August 2006. Groundwater levels measured at the Site on May 15, 2007 ranged from 9.62 to 11.99 feet below the top of the well casings. During the 13 monitoring events conducted by Farallon since 2000, the estimated



groundwater flow direction consistently has been to the west-northwest toward the Sammamish River, similar to the estimated groundwater flow direction depicted on Figure 3.

3.0 SITE CLOSURE ACTIVITIES

The Site closure activities were conducted in May and June 2007 in accordance with the Work Plan, and involved collecting soil, groundwater, and indoor air samples, as directed by Ecology, to address data gaps and provide confirmation data for Site closure.

3.1 SCOPE OF WORK FOR SITE CLOSURE ACTIVITIES

The scope of work for the Site closure activities included the following work elements:

- Preparing a Health and Safety Plan in accordance with MTCA and Part 1910.120 of Title 29 of the Code of Federal Regulations prior to initiating field activities;
- Performing conductible and non-conductible utility locates at the proposed boring locations using a private utility location service and contacting the One-Call Center for utility location;
- Advancing interior direct-push borings FB-1 and FB-2 at the location of the former Redmond One Hour Cleaners;
- Advancing exterior (FB-3) and interior (FB-4 and FB-5) direct-push borings at the Cleaning Center of Redmond facility;
- Installing monitoring well MW-10 at the southeastern corner of the Redmond Center property;
- Submitting a minimum of one soil sample from each boring for laboratory analysis;
- Collecting indoor air samples IA-1 and IA-2 at a tenant space down-gradient of the Cleaning Center of Redmond facility;
- Sampling monitoring well MW-10 and submitting the groundwater sample for laboratory analysis;
- Surveying the elevation of the top of the monitoring well MW-10 casing to a common datum; and
- Preparing this Site Closure Report.

A detailed description of the Site closure field activities is provided in the following subsections.

3.2 SOIL ASSESSMENT AND MONITORING WELL INSTALLATION

Field activities to assess soil conditions and install a monitoring well were conducted under the supervision of a Farallon Scientist and in accordance with the Work Plan, except as noted below. Prior to the commencement of drilling, a private utility location survey was conducted by Applied Professional Service, Incorporated of North Bend, Washington to locate on-Site conductible and non-conductible utilities. Cascade Drilling of Woodinville, Washington performed the drilling activities using limited-access direct-push and hollow-stem-auger drilling rigs. An exclusion zone was set up around the drill rig and sampling locations at indoor drilling


locations to prevent access by the public or tenants. Each drilling area was restored to pre-existing conditions. Work at the former Redmond One Hour Cleaners location (currently a QFC grocery store) was conducted during the late evening/early morning to minimize disruption of business operations.

Four of the five borings drilled to assess soil conditions (borings FB-1, FB-2, FB-4, and FB-5) were sampled continuously from the ground surface to depths ranging from 4 to 12 feet bgs. Boring FB-3 was located north of the Cleaning Center of Redmond facility in an area containing several underground utilities. To avoid damaging the utilities, a vactor truck was used to remove soil from boring FB-3 to a depth of 8.5 feet bgs, and a hand-auger was used to collect soil samples at varying intervals from the ground surface to 8.5 feet bgs, after which the drill rig was used to the maximum depth explored. The direct-push sampler was lined with a disposable acetate sleeve that was removed and opened to reveal the sample after driving each 4-foot sample interval.

Soil samples were collected from boring MW-10 at approximately 5-foot intervals during advancement, to a total depth of 25 feet bgs. The monitoring well was constructed of 2-inch-diameter blank polyvinyl chloride casing flush-threaded to 15 feet of 0.010-inch slotted well screen. The bottom and top of the well were fitted with a threaded polyvinyl chloride bottom cap and a locking compression-fit well cap, respectively. The annulus of the borehole was filled with #12/10 silica sand to 1 foot above the top of the screened interval. A 6-foot bentonite seal was installed above the sand pack. The monitoring well was completed at the surface with a flush-mounted, traffic-rated well box set in concrete. Each boring was backfilled with bentonite chips and capped with either asphalt or concrete to match the surface grade, with the exception of flooring materials, where applicable.

The soil samples were described in accordance with the Unified Soil Classification System and screened in the field for potential evidence of contamination using visual observation, notation of odor, and a photoionization detector (PID) to detect the presence of volatile organic vapors. The soil descriptions and PID readings were recorded on the boring logs, which are provided in Appendix A.

Soil samples collected from the borings were transferred directly into laboratory-prepared sample containers. Each soil sample consisted of a 4-ounce laboratory-prepared glass soil sample container that was completely filled to eliminate headspace. In addition, a sample from each sampling interval was collected according to EPA Method 5035A. Care was taken not to handle the seal or inside cap of the container when placing the sample into the containers. The sample containers were clearly labeled, using the unique sample number designation and labeling protocol described in the Work Plan.

The soil samples were submitted to OnSite Environmental Inc. of Redmond, Washington for laboratory analysis of HVOCs using EPA Method 8260B. At the request of Ecology, three soil samples per boring were analyzed when possible, with the exception of the monitoring well boring, for which one sample was analyzed for waste disposal purposes.



All non-dedicated field sampling equipment was cleaned and decontaminated between each use and prior to leaving the Site. Soil cuttings, purge water, and decontamination wash water were contained on Site in labeled 55-gallon drums pending waste profiling and proper disposal.

3.2.1 Former Redmond One Hour Cleaners

Borings FB-1 and FB-2 were advanced at the location of the former Redmond One Hour Cleaners, in the eastern portion of the current QFC grocery store in Redmond Center (Figure 2). The purpose of the borings was to assess whether a release of PCE had occurred at the location of the former Redmond One Hour Cleaners. The two borings were placed in the estimated vicinity of the former dry cleaning machine. Borings FB-1 and FB-2 were advanced to 10 and 4 feet bgs, respectively, prior to drill refusal due to dense soils. The three soil samples collected from boring FB-1 and the single soil sample collected from boring FB-2 were submitted for laboratory analysis.

The Work Plan stated that up to four borings would be advanced at the former Redmond One Hour Cleaners facility. Only two borings were advanced due to the presence of dense soils that did not permit advancement of the borings to the planned depth. It is Farallon's opinion that the samples collected from the two boring locations are representative of subsurface conditions in the targeted area.

3.2.2 Cleaning Center of Redmond

Farallon installed an SVE system to remove residual concentrations of PCE in the unsaturated soil above the groundwater table, and conducted periodic groundwater monitoring events to document concentrations of PCE in groundwater over time. The SVE system operated from August 2003 to August 2006. The purpose of the confirmation soil sampling conducted at the Cleaning Center of Redmond facility was to assess whether concentrations of HVOCs in subsurface soil still exceed MTCA Method A or B cleanup levels after 3 years of SVE system operation.

Boring FB-3 was located north of the Cleaning Center of Redmond, at the closest accessible location to former monitoring well MW-4 (Figure 2). The analytical result for a soil sample collected during installation of MW-4 indicated that a concentration of PCE exceeded the MTCA Method A cleanup level. Borings FB-4 and FB-5 were located adjacent to the former dry cleaning machine, where prior investigations by others indicated that concentrations of HVOCs in subsurface soil exceeded MTCA Method A and B cleanup levels (Figure 2).

Borings FB-3, FB-4, and FB-5 were advanced to 11, 12, and 8 feet bgs, respectively. Boring FB-5 was abandoned at 8 feet bgs due to pea gravel sloughing into the boring. Three soil samples per boring were selected for laboratory analysis. The samples collected from depths similar to those for the investigation conducted by GeoEngineers, Inc. (2001) were selected for laboratory analysis to enable comparison between past and current results.

3.2.3 Redmond Center

Monitoring well MW-10 was located at the southeastern corner of Redmond Center to evaluate the concentrations of HVOCs in groundwater migrating onto the Redmond Center property from



an up-gradient off-Site source (Figure 2). A single soil sample was collected from the vadose zone of monitoring well MW-10 for waste disposal characterization.

Monitoring well MW-10 was developed with the use of a submersible pump. Monitoring well development consisted of surging and purging the wells until a minimum of 10 submerged well volumes were removed and groundwater no longer appeared turbid.

3.3 GROUNDWATER SAMPLING

Groundwater sampling field activities were conducted in accordance with the Work Plan and consisted of a quarterly confirmation groundwater monitoring event, and sampling groundwater at newly installed monitoring well MW-10. The confirmation groundwater monitoring event and sampling at monitoring well MW-10 included the following tasks:

- Measuring the depth to groundwater in each monitoring well;
- Purging groundwater using EPA low-flow sampling protocols prior to collecting groundwater samples; and
- Submitting the groundwater samples for laboratory analysis of HVOCs using EPA Method 8260B.

Upon Farallon's arrival at the Site, each monitoring well was opened and the water level in the well was permitted to equilibrate with atmospheric pressure for a minimum of 15 minutes prior to measuring the depth to groundwater. Groundwater levels were measured to an accuracy of 0.01 foot using an electric water-level meter.

Purging and sampling of each monitoring well was performed using a peristaltic pump and dedicated polyethylene tubing at flow rates ranging from 100 to 300 milliliters per minute. The tubing intake was placed at approximately mid-screen in each monitoring well. During purging, water quality was monitored using a YSI 600XL water quality system equipped with a flow-through cell. Water quality was monitored and results were recorded for temperature, pH, specific conductance, dissolved oxygen, turbidity, and oxidation-reduction potential. Each monitoring well was purged until the water quality parameters for temperature, pH, and specific conductance stabilized.

Following purging, groundwater samples were collected 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 to OnSite Environmental Inc. under standard chain-of-custody protocols for laboratory analysis. The groundwater samples were submitted for analysis of HVOCs using EPA Method 8260B. All purge water generated during the monitoring event was placed in a labeled 55-gallon steel drum and stored temporarily on Site pending disposal.

3.3.1 Confirmation Groundwater Monitoring Event

A groundwater monitoring event was performed on May 15, 2007 to collect the fourth consecutive quarter of confirmation monitoring data at the Redmond Center property. The



purpose of the confirmation groundwater monitoring was to fulfill Ecology's requirement of four consecutive quarters of groundwater quality results below applicable MTCA Method A or B cleanup levels to demonstrate that groundwater quality no longer represents a threat to human health or the environment. Depth to groundwater measurements were collected at Redmond Center property monitoring wells MW-1 through MW-3, MW-5, and MW-7 through MW-9; and at monitoring wells EMW-1 and EMW-2 located on the east-adjacent Echo Cleaners property (Figure 3). Groundwater samples were collected from monitoring wells MW-1 through MW-3, MW-7, and MW-9 for laboratory analysis.

3.3.2 Groundwater Assessment

Monitoring well MW-10 was sampled on June 20, 2007 to assess whether concentrations of HVOCs in groundwater were migrating onto the Redmond Center property from an up-gradient, off-Site source (Figure 3).

The monitoring well elevation was surveyed by Professional Land Surveyors, Inc. of Issaquah, Washington to determine the top of casing elevation to an accuracy of 0.01 foot relative to the City of Redmond Benchmark "RED20," with an elevation of 43.519 feet, as published on the Washington Council of County Surveyors web site during February 2006 (point ID #6035).

3.4 INDOOR AIR SAMPLE COLLECTION

Indoor air samples were collected from a tenant space (Staples store) down-gradient from the Cleaning Center of Redmond on June 12, 2007 to assess whether concentrations of HVOCs may be migrating from groundwater into indoor air, causing a potential threat to human health. As requested by Ecology, the selected indoor air sample locations are the closest tenant space down-gradient from the Cleaning Center of Redmond with a perforation in the floor (floor drain), which potentially could allow concentrations of HVOCs to enter the building space.

Air Toxics, Ltd. of Folsom, California provided two Summa canisters to meet the quality assurance/quality control (QA/QC) standards for collection of the air samples. The Summa canisters were outfitted with flow regulators to collect air over an approximately 10-hour time-weighted period. Both indoor air samples were collected in the women's restroom located in the northwestern corner of the Staples store. One Summa canister was placed adjacent to the floor drain (IA-1) and the intake of the second Summa canister was placed in the breathing zone (IA-2) (Figure 4). The Summa canisters were collected at the end of the 10-hour sampling interval and shipped to Air Toxics, Ltd. for laboratory analysis for PCE and TCE using EPA Method TO15 SIM for low-level HVOCs. The potentially applicable screening levels for HVOCs in indoor air are described below.

The National Institute for Occupational Safety and Health (NIOSH) has established recommended exposure limits (REL) for compounds in the workplace, using a 10-hour workday during a 40-hour work week. With the exception of TCE, NIOSH does not provide RELs for known carcinogens, but bases exposure limits on risk evaluations and potential exposures, and recommends minimization of workplace exposure.



MTCA has not established a Method B standard formula value for PCE in air. The Occupational Safety and Health Administration (OSHA) has established permissible exposure limits (PELs), which are time-weighted averages that must not be exceeded during any 8-hour work shift of a 40-hour work week. The Washington State Department of Health (DOH) has established background concentrations of PCE and TCE for indoor air based on compilation of data from published sources, which also are considered in the evaluation of indoor air quality (DOH 2003). Farallon used the DOH background concentration of PCE for comparison with indoor air concentrations at the Site.



4.0 RESULTS

The results of the Site closure field activities and laboratory analyses are presented below. Soil sample analytical results are presented in Table 1 and illustrated on Figure 2. Groundwater elevations and analytical results are presented in Tables 2 and 3 and illustrated on Figure 3. Indoor air analytical results are presented in Table 4 and illustrated on Figure 4. Direct-push boring and monitoring well logs are provided in Appendix A. Soil and groundwater laboratory analytical results are provided in Appendix B.

4.1 SOIL

Soil encountered in the borings advanced during the investigations consisted of sand with varying quantities of gravel to the maximum depth explored of 25 feet bgs. No field indications of contamination were observed during drilling for the soil borings or the monitoring well boring, with the exception of high PID readings during installation of monitoring well MW-10. Based on field observation, the high PID readings observed during installation of monitoring well MW-10 are attributed to equipment error rather than the presence of volatile organic compounds.

QA/QC testing performed by OnSite Environmental Inc. included evaluation of surrogate recoveries, method blanks, and duplicates. Soil samples FB3-1, FB3-6, FB4-0.5, FB4-5, FB4-9, FB5-0.5, FB5-3, and FB5-5 detected methylene chloride ranging from 0.010 to 0.039 mg/kg with an "H" flag denoted on the laboratory analytical report. The "H" flag indicates that methylene chloride is a common laboratory solvent that may have been introduced during sample preparation, and may be impacting the sample result. The remaining QA/QC data associated with the confirmation soil samples were within acceptable QA/QC limits, and the data are acceptable for use in this report. The laboratory analytical reports are provided in Appendix B.

4.1.1 Former Redmond One Hour Cleaners

Concentrations of HVOCs in the soil samples analyzed from boring FB-1 at 1, 6, and 10 feet bgs, and from boring FB-2 at 1 foot bgs either were not detected above the laboratory practical quantitation limits (PQL) or were below MTCA Method A or B cleanup levels (Table 1; Figure 2).

4.1.2 Cleaning Center of Redmond

Concentrations of HVOCs in the soil samples analyzed from boring FB-3 at 1, 6, and 9 feet bgs, boring FB-4 and 0.5, 5, and 9 feet bgs, and boring FB-5 at 0.5, 3, and 5 feet bgs were either not detected above the laboratory PQL or were below MTCA Method A or B cleanup levels (Table 1; Figure 2).

4.1.3 Redmond Center

Concentrations of HVOCs in the soil sample analyzed from monitoring well boring MW-10 at 11 feet bgs were below the laboratory PQL (Table 1; Figure 2).



4.2 GROUNDWATER

The confirmation groundwater monitoring event was performed on May 15, 2007, and monitoring well MW-10 was sampled on June 20, 2007.

4.2.1 Confirmation Groundwater Monitoring Event

The groundwater elevations for the monitoring event ranged from 22.72 feet (MW-8) to 25.47 feet (EMW-1), relative to mean sea level (Table 2). Contouring of the groundwater levels indicated a groundwater flow direction predominantly toward the west-northwest, with an average gradient of 0.002 foot per foot. Previous monitoring events performed at the Site also have indicated a groundwater flow direction to the west-northwest.

The analytical results indicated that concentrations of PCE in groundwater samples collected from monitoring wells MW-1 through MW-3, MW-7, and MW-9 during the May 2007 monitoring event were below the MTCA Method A cleanup level of 5 μ g/l for PCE in groundwater. Chloroform was detected at low concentrations (less than 0.51 μ g/l) in the groundwater samples collected from monitoring wells MW-1, MW-2, MW-7, and MW-9. All other HVOCs were reported non-detect at the laboratory PQL, or were below applicable MTCA Method A or B cleanup levels. Figure 3 shows the PCE concentrations for groundwater samples collected from the monitoring wells on May 15, 2007. Table 3 summarizes the groundwater analytical results for selected HVOCs.

The QA/QC testing performed included an evaluation of surrogate recoveries, method blanks, and blank spike/blank spike duplicates. All laboratory QA/QC data were within acceptable ranges of tolerance, as indicated in the laboratory test certificates presented in Appendix B of this report. Farallon also submitted one field duplicate sample (MW3-FD-051507), which was collected concurrently with the primary sample from monitoring well MW-3. The calculated relative percent difference for PCE in the field duplicate sample was 8.3 percent, which is within the acceptable limit for relative percent difference. The QA/QC results indicate that the data are acceptable for use in this report. The laboratory analytical reports for the monitoring event are provided in Appendix B.

4.2.2 Groundwater Assessment

Analytical results for the groundwater sample collected from monitoring well MW-10 indicated a concentration of PCE of 7.4 μ g/l, which slightly exceeds the MTCA Method A cleanup level of 5 μ g/l (Figure 3; Table 3). A concentration of TCE below the MTCA Method A cleanup level was detected in the groundwater sample collected from monitoring well MW-10 (Table 3). All other HVOCs were reported non-detect at the laboratory PQL, or were below applicable MTCA Method A or B cleanup levels (Table 3).

The QA/QC testing included evaluation of surrogate recoveries, method blanks, and duplicates. The QA/QC data associated with the groundwater sample were within acceptable QA/QC limits, and the data are acceptable for use in this report. The laboratory analytical report is provided in Appendix B.



4.3 INDOOR AIR

The laboratory analytical results for the indoor air samples collected from the women's restroom in the Staples store indicated a PCE concentration of 1.4 micrograms per cubic meter ($\mu g/m^3$) in both samples (Table 4; Figure 4). Concentrations of TCE were reported as non-detect at the laboratory PQL in both indoor air samples (Table 4; Figure 4).

The analytical result for PCE in indoor air is expected to be the worst-case scenario inside the Staples store, because the sample was collected inside a closed room with the ventilation system turned off. According to the Staples store manager, the ventilation system is turned off approximately 30 minutes before the store closes (8:30 p.m.) and is turned back on approximately 30 minutes before the store opens (6:30 a.m.). The indoor air sample collection time was from approximately 9:15 p.m. to 7:15 a.m. The detected concentrations of PCE in indoor air are below the OSHA PEL for PCE of 678,000 μ g/m³, and below the DOH background concentration for indoor air of 5 μ g/m³ (Table 4). There are no established NIOSH or MTCA screening levels for PCE in indoor air.

The QA/QC testing included evaluation of surrogate recoveries, method blanks, and laboratory duplicates. The QA/QC data associated with the indoor air sample were within acceptable QA/QC limits, and the data are acceptable for use in this report. The laboratory analytical report is provided in Appendix B.



5.0 CONCLUSIONS

Farallon conducted various investigations during 2007 in accordance with the Work Plan, except as noted in Section 3 of this report. The investigations were conducted as an independent remedial action under the Voluntary Cleanup Program and in accordance with MTCA. Farallon's conclusions regarding the investigations conducted at the location of the former Redmond One Hour Cleaners and at the southeastern portion of the Redmond Center property, and the confirmation soil and groundwater sampling associated with the prior release of PCE at the Cleaning Center of Redmond facility are presented below.

5.1 FORMER REDMOND ONE HOUR CLEANERS

The results of the prior investigation by GeoEngineers, Inc. (2001) of soil conditions outside the existing building to the north of the location of the former Redmond One Hour Cleaners indicated that concentrations of PCE did not exceed the MTCA Method A cleanup level in effect at that time. The analytical results for HVOCs in groundwater samples collected at the monitoring wells nearest to (MW-5) and down-gradient of (MW-1 and MW-2) the location of the former Redmond One Hour Cleaners have been below the MTCA Method A cleanup levels for more than four consecutive quarters. In addition, concentrations of PCE in soil samples collected from borings FB-1 and FB-2 drilled at the direction of Farallon inside the QFC grocery store to assess soil conditions at the suspected location of the former Redmond One Hour Cleaners, Inc. and Farallon confirm that soil and groundwater conditions do not represent a potential threat to human health or the environment at or down-gradient of the former Redmond One Hour Cleaners.

5.2 CLEANING CENTER OF REDMOND

A release of PCE in the vicinity of the dry cleaning machine at the Cleaning Center of Redmond impacted soil and groundwater. In response to the confirmed release, the use of PCE was discontinued at the Cleaning Center of Redmond in October 2002, and a cleanup action using SVE was performed for 3 years commencing in August 2003. Confirmation soil sampling was conducted by Farallon in June 2007, and four quarters of confirmation groundwater monitoring were completed in May 2007.

The confirmation soil sampling program included drilling three borings at the Cleaning Center of Redmond facility. Concentrations of PCE in soil samples collected at exterior boring FB-3 from depths of 1 to 9 feet bgs were below the MTCA Method A cleanup level. Boring FB-3 was located as close as possible to former monitoring well MW-4. GeoEngineers, Inc. had analyzed a soil sample collected from 22.5 feet bgs in monitoring well MW-4 that exceeded the previous MTCA Method A cleanup level of 0.5 mg/kg. Farallon did not collect a soil sample from 22.5 feet bgs in boring FB-3, because it would have been below the groundwater table and therefore not representative of concentrations in soil. Concentrations of PCE in soil samples collected from interior borings FB-4 and FB-5 from depths of 0.5 to 9 feet bgs, similar to the GeoEngineers, Inc. sample depths from borings B-10 and B-11, were below the MTCA



Method A cleanup level, indicating that the operation of the SVE system at the source area was successful in remediating previously contaminated soil in the vadose zone, and that no additional confirmation sampling is warranted.

Confirmation groundwater monitoring events were conducted at monitoring wells MW-1 through MW-3, MW-7, and MW-9 in August and November 2006, and in February and May 2007. The estimated direction of groundwater flow during this period was west-northwest, consistent with prior monitoring events at the Site. The analytical results for all of the confirmation groundwater samples were below the MTCA Method A cleanup levels for PCE and TCE.

Indoor air samples collected adjacent to the floor drain in the tenant space west-adjacent to the Cleaning Center of Redmond contained concentrations of PCE that were below the DOH background concentration for indoor air, and did not exceed the OSHA PEL. There is no established MTCA Method B cleanup level or NIOSH REL for PCE in air.

The results of the confirmation soil and groundwater sampling program at the Cleaning Center of Redmond facility and the assessment of indoor air at the adjacent tenant space indicate that the cleanup action remediated the release of PCE to soil and groundwater, and that conditions no longer represent a potential threat to human health or the environment.

5.3 SOUTHEASTERN PORTION OF REDMOND CENTER

The groundwater sample collected from monitoring well MW-10, located at the southeastern corner of the Redmond Center property, contained a concentration of PCE exceeding the MTCA Method A cleanup level, and was similar to the concentrations detected in the reconnaissance groundwater samples collected by Farallon from borings B-2 and B-3, which were located at the southeastern corner of the Redmond Center property. The analytical results indicate that a plume of PCE in groundwater emanating from an up-gradient, off-Site source(s) is present in the southern portion of the Redmond Center property. The location of the off-Site source(s) has not been identified.

Farallon conducted limited historical research to identify properties located up-gradient (east-southeast) of monitoring well MW-10 that may have used or stored PCE and may be the source responsible for the concentrations of PCE present in groundwater beneath this area of the Redmond Center property. The limited historical research included review of Sanborn Fire Insurance maps (up to 1926), Polk City Directories (R.L. Polk & Co.), and prior research conducted by Farallon for due diligence projects for properties located in downtown Redmond.

Properties identified from the limited historical research that may have used, stored, and possibly released PCE to groundwater include the following:

• Overlake Cleaners, located at 16940 Northeast 79th Street. A release of PCE exceeding MTCA Method A cleanup levels was confirmed at this property. Review of documents in Ecology files by Farallon indicated that a release of PCE at the Overlake Cleaners has contributed contamination detected in City of Redmond Wells #1 and #2;



- Redmond Cleaners, located at 7981 Leary Way Northeast. According to Ecology's database, this facility currently is listed as a small quantity generator of hazardous materials (PCE) related to dry cleaning operations;
- Spic-n-Span Cleaners, historically (1985) located at 16504 Redmond Way, Suite D; and Daniels Cleaners, currently located at 16450 Redmond Way. Farallon has no additional information on these properties;
- Foto Fast, historically (1980) located at 15958 Redmond Way. This was a film sales and processing facility that appears to have been directly across 160th Avenue Northeast from the Site, possibly at the location of the current Jamba Juice; and
- Former King County Maintenance Facility, located at 7733 Leary Way Northeast. Concentrations of PCE in groundwater exceeding the MTCA Method A cleanup level were confirmed at this facility that currently is owned by the City of Redmond. This facility may be cross-gradient to monitoring well MW-10 based on the estimated property-specific groundwater flow direction.

In addition to the above properties, numerous automotive repair facilities historically were or currently are located up-gradient of monitoring well MW-10. It is possible that one or more of these facilities used PCE as a degreasing solvent, although use of PCE was not historically widespread at automotive repair facilities based on Farallon's experience in conducting site assessments and cleanup actions at these types of facilities.

5.4 SUMMARY

Farallon has completed the Site closure activities described in the Work Plan. Soil and groundwater data collected at and down-gradient of the former Redmond One Hour Cleaners facility did not identify a release of PCE exceeding MTCA Method A cleanup levels. No further action is warranted to assess this former facility. In addition, the cleanup action completed at the Cleaning Center of Redmond was successful in remediating the release of PCE to soil and groundwater, and conditions no longer represent a threat to human health or the environment. No further actions are warranted or planned at the Site.

The analytical results for a groundwater sample collected at monitoring well MW-10 indicates that groundwater at the southeastern corner of the Redmond Center property has concentrations of PCE that slightly exceed the MTCA Method A cleanup level. This monitoring well is not located in an area that could have been impacted by the release of PCE at the Cleaning Center of Redmond. The presence of PCE in groundwater at this location is attributed to a release from an off-Site source(s). The specific location of the off-Site source(s) has not been confirmed, although the limited historical research conducted by Farallon identified several facilities located proximate to or up-gradient of monitoring well MW-10 that potentially may be the source of groundwater contamination impacting the Redmond Center property. Farallon recommends that Ecology and/or the City of Redmond obtain sufficient information regarding subsurface conditions at these facilities to assess whether a release of PCE to groundwater may have occurred.



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7.0 LIMITATION

The conclusions and recommendations contained in this report are based on professional opinions with regard to the subject matter. These opinions have been arrived at in accordance with currently accepted hydrogeologic and engineering standards and practices applicable to this location, and are subject to the following limitation.

Certain information used by Farallon in this report has been obtained, reviewed, and/or evaluated from various sources believed to be reliable. Although Farallon's conclusions, opinions, and recommendations are based in part on such information, Farallon's services did not include verification of its accuracy or authenticity. Should such information prove to be inaccurate or unreliable, Farallon reserves the right to amend or revise its conclusions, opinions, and/or recommendations.

FIGURES

SITE CLOSURE REPORT Cleaning Center of Redmond 15796 Redmond Way Redmond, Washington

Farallon PN: 650-001









TABLES

SITE CLOSURE REPORT Cleaning Center of Redmond 15796 Redmond Way Redmond, Washington

Farallon PN: 650-001

Table 1
Summary of Soil Sample Analytical Results - HVOCs
Cleaning Center of Redmond
Redmond, Washington
Faralion PN: 650-001

				Α	nalytical Results ()	milligrams per kilogı	ram)
Boring ID	Sample Number	Date Sampled	Sample Depth (fect) ¹	PCE ²	ICE ²	cis-1,2- Dichloroethene ²	trans-1,2- Dichloroethene ²
	FB1-1	6/1/2007	1	0 0043	<0.0012	<0.0012	<0.0012
FBI	FB1-6	6/1/2007	6	0,0021	<0.0013	<0 0013	<0 0013
	FB1-10	6/1/2007	10	0.0021	<0.0013	<0.0013	<0.0013
FB2	FB2-1	6/1/2007	I	0.0059	<0.0011	<0.0011	<0.0011
	FB3-1	6/12/2007	1	0.002	<0.00091	<0 00091	<0.00091
FB3	FB3-6	6/12/2007	6	0.0054	<0 0014	0.043	0.0028
	FB3-9	6/12/2007	9	0.02	<0.0010	0.0017	<0.0010
	FB4-0.5	6/12/2007	0 5	0,0041	<0.0010	<0 0010	<0,0010
FB4	FB4-S	6/12/2007	5	0.0061	<0.00096	<0.00096	<0.00096
	FB4-9	6/12/2007	9	0.0026	<0.0013	<0.0013	<0.0013
	FB5-0.5	6/12/2007	0.5	<0.00099	<0.00099	<0 00099	<0.00099
FB5	FB5-3	6/12/2007	3	0.021	<0 00081	<0,00081	<0.00081
	FB5-5	6/12/2007	5	0.018	<0.00094	<0.00094	<0,00094
MW10	MW10-11	6/20/2007	11	<0.00093	<0.00093	<0.00093	<0.00093
MICA Cleanup Lo	IICA Cleanup Levels for Soil				0.033	800 ⁴	1,6004

NOTES:

< denotes concentration is less than the laboratory practical quantitation limit indicated.

¹Depth in feet below ground surface.

²Analyzed by U.S. Environmental Protection Agency Method 8260B

³Washington State Department of Ecology Model Toxics Control Act (MTCA) Cleanup Regulation Method A Soil Cleanup Level. Chapter 173-340 of the Washington Administrative Code. as amended February 2001

⁴MTCA Cleanup Levels and Risk Calculations (CLARC) Standard Method B Formula Values, Version

3.1. updated November 2003

PCE = tetrachloroethene

TCE = trichloroethene

HVOCs = halogenated volatile organic compounds

Table 2Summary of Groundwater ElevationsCleaning Center of RedmondRedmond, WashingtonFarallon PN:650-001

		Top of Well Casing		Groundwater
Well Identification	Date	Elevation (feet)	Depth to Water (feet) ²	Elevation (feet)
	12/20/2000		11.1	88.98
	6/6/2001		10.47	89.61
	6/28/2002		11.51	88.57
	8/13/2003	100.08 ¹	12.33	87.75
	11/12/2003	100.00	10.58	89.5
	2/18/2004		8.71	91.37
MW-1	5/10/2004		11.43	88.65
	8/27/2004	manana a a a a a a a a a a a a a a a a a	11.26	88.82
	2/15/2006		8.37	26.58
	8/23/2006	-	12.73	22.22
	11/21/2006	34 95 '	6.71	28.24
	2/28/2007		9.81	25.14
	5/15/2007		10.83	24.12
	12/20/2000		12.07	88.69
	6/6/2001		11.43	89.33
	6/28/2002		12.58	88.18
	8/13/2003	100 76	13.27	87.49
	11/12/2003	100.10	11.65	89.11
	2/18/2004		9.95	90.81
MW-2	5/10/2004		12,47	88.29
	8/27/2004		12.11	88.65
	2/15/2006		9.60	26.03
	8/23/2006		12.72	22.91
	11/21/2006	35.63 3	7.49	28-14
	2/28/2007		10.91	24.72
	5/15/2007	· · · · · · · · · · · · · · · · · · ·	11.99	23.64
	12/20/2000		9.7	88.71
	6/6/2001		9.08	89.33
	6/28/2002		10.22	88.19
	8/13/2003	98.41 ¹	10.88	87.53
	11/12/2003		9.31	89.1
	2/18/2004		7.59	90.82
MW-3	5/10/2004		10.1	88.31
	8/27/2004		9.73	88.68
	2/15/2006		7.25	26.03
	8/23/2006		10.37	22.91
	11/21/2006	33.28 3	5.11 	28.17
	2/28/2007		8.51	24.77
	5/15/2007		9.62	23.66
	12/20/2000		9.71	89.11
MW-4	6/6/2001	98 87	9.18	89.64
	6/28/2002	20.02	10.26	88.56
	8/13/2003		Well Removed	
	12/20/2000		11.97	89.53
	6/6/2001		11.47	89.85
	6/28/2002		12.52	88.8
	8/13/2003	101 32 1	13,41	87.91
	11/12/2003			89.85
	2/18/2004		9.46	91.86
MW-5	5/10/2004		12.41	88.91
1	8/27/2004		12.41	98.91
	2/15/2006		9,18	27.01
	8/23/2006	_	12.73	23.46
	11/21/2006	36 19 ³	7.92	28.27
	2/28/2007		10.75	25.44
	5/15/2007		11.73	24.46

Table 2 Summary of Groundwater Elevations Cleaning Center of Redmond Redmond, Washington Farallon PN:650-001

	12/20/2000		9.81	88.71
MW-6	6/6/2001	08 52 1	9.19	89.33
	6/28/2002	98.52	10.33	88.19
	8/13/2003		Well Removed	
	12/20/2000		9.7	88.59
	6/6/2001		9.02	89.27
	6/28/2002		10.21	88.08
	8/13/2003	00.00 !	10.85	87.44
	11/12/2003	96.29	9.32	88.97
	2/18/2004		7.68	90.61
MW-7	5/10/2004		10.07	88.22
	8/30/2004		9 72	88.57
	2/15/2006		7.31	25.85
	8/23/2006		10.35	22.81
	11/21/2006	33.16 ³	5.02	28.14
	2/28/2007		8.54	24.62
	5/15/2007		9.68	23.48
	12/20/2000		11.12	87.99
	6/6/2001		10.34	88.77
	6/28/2002		11.61	87.5
	8/13/2003	00.11	12.1	87.01
	11/12/2003	99.11	10.82	88.29
	2/18/2004		9.42	89.69
MW-8	5/10/2004		11.51	87.60
	8/27/2004		10.79	88.32
	2/15/2006		9.02	24.96
	8/23/2006		11.69	22.29
	11/21/2006	33.98 ³	5.98	28.00
	2/28/2007		10.06	23.92
	5/15/2007		11.26	22.72
	8/13/2003		11.38	87.75
	11/12/2003		9.6	89.53
	2/18/2004	9 9 13 ¹	7.72	91.41
	5/10/2004		10.46	88.67
NW 0 ⁴	8/27/2004		10.28	88.85
MW-9	2/15/2006		7.36	26.64
	8/23/2006		10.72	23.28
	11/21/2006	34.00 ⁻³	5.72	28.28
	2/28/2007		8.79	25.21
	5/15/2007		9.82	24.18
MW-10	6/22/2007	38.29	13.84	24.45
	2/15/2006		10.51	28.08
	8/23/2006		14.42	24.17
EMW-1	11/21/2006	38 59 ³	10.00	28.59
	2/28/2007		12.20	26.39
	5/15/2007		13.12	25.47
	2/15/2006		10.68	27.95
	8/23/2006		14.56	24.07
EMW-2	11/21/2006	38.63 ³	10.11	28.52
	2/28/2007		12.38	26.25
	5/15/2007		13.3	25.33
1			,	

NOTES:

---- = not applicable

Relative to an on-site datum of 100 feet

²In feet below top of casing.

³In feet above mean sea level

⁴Well installed on November 19, 2002

Table 3 Summary of Groundwater Sample Analytical Results - HVOCs Cleaning Center of Redmond Redmond, Washington Farallon PN: 650-001

			Analytical Results (micrograms per liter)			
		Sample			cis-1,2-	
Well Identification	Date Sampled	Collected By	Tetrachloroethene	Trichloroethene	Dichloroethene	Vinyl Chloride
	3/6/2000	GeoEngineers	1.6	<1.0	<5.0	<5.0
	8/8/2000	GeoEngineers	5.4	<1.0	<5.0	<5.0
	12/20/2000	Farallon	2.7	<0.20	<0.20	<0.20
	6/6/2001	Farailon	1.3	<0.20	<0.20	<0.20
	6/28/2002	Farallon	2.1	<0.20	<0.20	<0.20
	8/13/2003	Farallon	1.2	<0.20	<0.20	<0.20
	11/12/2003	Farallon	3.3	0.22	<0.20	<0.20
MW-1	2/18/2004	Farallon	2.9	<0.20	<0.20	<0.20
	5/10/2004	Farallon	4.0	< 0.20	<0.20	<0.20
	8/27/2004	Farallon	8.5	0.84	1.2	0.76
	2/15/2006	Farallon	2.4	<0.20	<0.20	< 0.20
	8/23/2006	Farallon	3.3	<0.20	<0.20	<0.20
	11/21/2006	Farallon	4.5	0.26	<0.20	<0.20
	2/28/2007	Farallon	2.3	<0.20	<0.20	<0.20
	5/15/2007	Farallon	3.3	<0.20	<0.20	<0.20
	3/6/2000	GeoEngineers	<1.0	<1.0	<5.0	<5.0
	8/8/2000	GeoEngineers	2.9	<1.0	<5.0	<5.0
	12/20/2000	Farallon	2.9	<0.20	<0.20	<0.20
	6/6/2001	Farallon	1.9	<0.20	<0.20	<0.20
	6/28/2002	Farallon	0.81	<0.20	<0.20	<0.20
	8/13/2003	Farallon	0.99	<0.20	<0.20	<0.20
	11/12/2003	Farallon	0.66	<0.20	<0.20	<0.20
MW-2	2/18/2004	Farallon	0.88	<0.20	< 0.20	<0.20
	5/10/2004	Farallon	0.54	<0.20	<0.20	<0.20
	8/27/2004	Farallon	0.56	<0.20	<0.20	<0.20
	2/15/2006	Farallon	1.1	<0.20	<0.20	<0.20
	8/23/2006	Farallon	1.0	<0.20	<0.20	<0.20
	11/21/2006	Farallon	1.1	<0.20	<0.20	<0.20
	2/28/2007	Farallon	0.83	<0.20	<0.20	<0.20
	5/15/2007	Farallon	1.30	<0.20	<0,20	<0.20
	3/6/2000	GeoEngineers	0.1>	<1.0	<5.0	<5.0
	8/8/2000	GeoEngineers	<1.0	<1.0	<5.0	<5.0
	12/20/2000	Faralion	0.34	<0.20	<0.20	<0.20
	6/6/2001	Farallon	2.0	<0.20	< 0.20	<0.20
	6/28/2002	Farallon	2.0	<0.20	<0.20	<0.20
	8/13/2003	Farallon	7.3	<0,20	0.49	<0.20
	11/12/2003	Farallon	4.5	0.21	<0,20	<0.20
MW-3	2/18/2004	Farallon	2.8	<0.20	<0.20	<0.20
	5/10/2004	Farallon	3.5	<0.20	<0.20	<0.20
	8/27/2004	Farallon	6.7	0.45	0.24	<0.20
	2/15/2006	Farallon	2.1	<0.20	<0.20	<0.20
	8/23/2006	Farallon	2.5	<0.20	<0.20	<0.20
	11/21/2006	Farallon	5.0	0.21	<0.20	<0.20
	2/28/2007	Farallon	1.8	<0.20	<0.20	<0.20
	5/15/2007	Farallon	2.5	<0.20	<0.20	<0.20
MTCA Cleanup Level	s for Groundwa	iter	5.02	5.0 ²	80 ³	0.2 ²

Table 3 Summory of Groundwater Sample Analytical Results - HVOCs Cleaning Center of Redmond Redmond, Washingtou Farallon PN: 650-001

			Analytical Results (micrograms per liter)			
		Sample			cis-1,2-	
Well Identification	Date Sampled	Collected By	Tetrachloroethene	Trichloroethene	Dichloroethene	Vinyl Chloride
	3/6/2000	GeoEngineers	1.6	<1.0	<5.0	<5.0
	8/8/2000	GeoEngineers	5.4	<1.0	<5.0	<5.0
	12/20/2000	Farallon	2.7	<0.20	<0.20	<0,20
	6/6/2001	Farallon	1.3	<0.20	<0.20	<0.20
	6/28/2002	Farallon	2.1	<0.20	<0.20	<0.20
	8/13/2003	Farallon	1.2	<0.20	<0.20	<0.20
	11/12/2003	Farallon	3.3	0.22	<0.20	<0.20
MW-i	2/18/2004	Farallon	2.9	<0.20	<0.20	<0.20
	5/10/2004	Farallon	4.0	<0.20	< 0.20	<0.20
	8/27/2004	Farallon	8.5	0.84	۱.2	0.76
	2/15/2006	Farallon	2.4	<0.20	<0.20	<0.20
	8/23/2006	Farallon	3.3	< 0.20	<0.20	<0.20
	11/21/2006	Farallon	4,5	0.26	<0.20	<0.20
	2/28/2007	Farallon	2.3	<0,20	<0.20	<0.20
	5/15/2007	Farallon	3.3	< 0.20	<0.20	<0.20
	3/6/2000	GeoEngineers	<1.0	<1.0	<5.0	<5.0
	8/8/2000	GeoEngineers	2.9	<1.0	<5.0	<5.0
	12/20/2000	Farallon	2.9	<0.20	<0.20	<0.20
	6/6/2001	Farallon	1.9	<0.20	<0.20	<0.20
	6/28/2002	Farallon	0.81	<0.20	<0.20	<0.20
	8/13/2003	Farallon	0.99	<0.20	<0.20	<0.20
	11/12/2003	Farallon	0.66	< 0.20	<0.20	<0.20
MW-2	2/18/2004	Farallon	0.88	<0.20	<0.20	<0.20
	5/10/2004	Farallon	0.54	< 0.20	<0.20	<0.20
	8/27/2004	Farallon	0.56	< 0.20	< 0.20	<0.20
	2/15/2006	Farallon	1.1	<0.20	<0.20	<0.20
	8/23/2006	Farallon	1.0	< 0.20	<0.20	< 0.20
	11/21/2006	Farallon	1.1	<0.20	<0.20	<0.20
	2/28/2007	Farallon	0.83	< 0.20	<0.20	< 0.20
	5/15/2007	Farallon	1.30	<0.20	< 0.20	<0.20
	3/6/2000	GeoEngineers	<1.0	<1.0	<5,0	<5.0
	8/8/2000	GeoEngineers	<1.0	<1.0	<5.0	<5.0
	12/20/2000	Farallon	0.34	<0.20	<0.20	<0.20
	6/6/2001	Farallon	2.0	<0.20	<0.20	<0.20
	6/28/2002	Farallon	2.0	<0.20	<0.20	<0.20
	8/13/2003	Farallon	7.3	<0.20	0.49	<0.20
	11/12/2003	Farallon	4.5	0.21	<0.20	< 0.20
MW-3	2/18/2004	Farallon	2.8	<0.20	< 0.20	<0.20
	5/10/2004	Farallon	3,5	<0.20	<0.20	<0.20
	8/27/2004	Farallon	6.7	0.45	0.24	<0.20
	2/15/2006	Farallon	2.1	<0.20	<0.20	< 0.20
	8/23/2006	Farallon	2.5	<0.20	< 0.20	<0.20
	11/21/2006	Farallon	5.0	0.21	<0,20	<0.20
	2/28/2007	Farallon	1.8	<0.20	<0.20	<0.20
	5/15/2007	Farallon	2.5	<0.20	<0,20	<0.20
MTCA Cleanup Levels for Groundwater		5.0 ²	5.0 ²	80 ³	0.22	

Table 3 Summary of Groundwater Sample Analytical Results - HVOCs Cleaning Center of Redmond Redmond, Washington Farallon PN: 650-001

			Analytical Results (micrograms per liter)					
		Sample			cis-1,2-			
Well Identification	Date Sampled	Collected By	Tetrachloroethene	Trichloroethene	Dichloroethene	Vinyl Chloride		
	3/6/2000	GeoEngineers	50	<1.0	<5.0	<5.0		
	8/8/2000	GeoEngineers	9.2	<1.0	<5.0	<5.0		
MW.4	12/20/2000	Farallon	28	0.43	0.78	<0.20		
141 14 -4	6/6/2001	Farallon	16	0.32	0.80	<0.20		
	6/28/2002	Farallon	14	0.5	1.50	<0.20		
	Well Rer	noved 2003	and a start grant provide a second of	and the second second second second	and a strategy against			
	3/6/2000	GeoEngineers	<1.0	<1.0	<5.0	<5.0		
	8/8/2000	GeoEngineers	<1.0	<1.0	<5.0	<5.0		
	12/20/2000	Farallon	2.0	<0.20	<0.20	<0.20		
	6/6/2001	Farallon	1.7	< 0.20	<0.20	< 0.20		
	6/28/2002	Farallon	1.6	< 0.20	<0.20	< 0.20		
MM1 5	8/13/2003	Farallon	0.2	<0.20	<0.20	<0,20		
IVI W-D	11/12/2003	Farallon	3.6	<0.20	< 0.20	< 0.20		
	2/18/2004	Farallon	4.8	<0.20	<0.20	<0.20		
	5/10/2004	Farallon	i.6	<0.20	<0.20	<0.20		
	8/27/2004	Farallon	1.4	<0.20	<0.20	<0.20		
	2/15/2006	Farallon	4.8	<0.20	<0.20	<0,20		
	8/23/2006	Farallon	1.0	<0.20	<0.20	<0.20		
	3/6/2000	GeoEngineers	11	<1.0	<5.0	<5.0		
	8/8/2000	GeoEngineers	27	<1.0	<5.0	<5.0		
	12/20/2000	Farallon	15	0.24	<0.20	<0.20		
M W-0	6/6/2001	Farallon	8.6	<0.20	<0.20	<0.20		
	6/28/2002	Farallon	6.3	<0.20	0.29	< 0.20		
	Well Ren	loved 2003	an a	angebergebergebergebergeber	sector/legalactics	y a cargo de la competencia de la comp		
	3/28/2000	GeoEngineers	15	3	<5.0	<5.0		
	8/8/2000	GeoEngineers	14	<1.0	<5,0	<5.0		
	12/21/2000	Farallon	12	<0.20	< 0.20	< 0.20		
	6/6/2001	Farallon	7.6	<0.20	<0.20	<0.20		
	6/28/2002	Farallon	3.9	<0,20	< 0.20	<0.20		
	8/13/2003	Farallon	5.3	<0.20	<0.20	<0.20		
	11/12/2003	Farallon	4.5	<0.20	<0.20	<0.20		
MW-7	2/18/2004	Farallon	3.6	<0.20	<0.20	<0.20		
	5/10/2004	Farallon	3.3	<0.20	<0.20	<0.20		
	8/30/2004	Farallon	3.6	<0.20	<0.20	<0.20		
	2/15/2006	Farallon	2.5	<0.20	<0.20	<0.20		
	8/23/2006	Farallon	2.3	<0.20	<0.20	<0.20		
	11/21/2006	Farallon	2.2	<0.20	<0.20	<0.20		
	2/28/2007	Farallon	2.1	<0.20	<0.20	<0.20		
	5/15/2007	Farallon	2.9	<0.20	<0.20	<0.20		
MTCA Cleanup Level	s for Groundwa	ter	5.02	5.0 ²	80 ¹	0.21		

Table 3 Summary of Groundwater Sample Analytical Results - HVOCs Cleaning Center of Redmond Redmond, Washington Facallon PN: 650-001

			Analytical Results (micrograms per liter)				
	}	Sampte			cis-1,2-		
Well Identification	Date Sampled	Collected By	Tetrachloroethene	Trichloroethene	Dichloroethene	Vinyl Chloride	
	4/14/2000	GeoEngineers	7.4	<1.0	<5.0	<5.0	
	8/8/2000	GeoEngineers	8.5	<1.0	<5.0	<5.0	
	12/20/2000	Farallon	5.7	0.33	0.48	<0.20	
	6/6/2001	Farallon	3.9	0.23	0.36	<0.20	
MW 9	6/28/2002	Farallon	4.1	0.29	0.46	<0,20	
141 14 -0	8/13/2003	Farallon	3.4	0.26	0.46	< 0.20	
	11/12/2003	Farallon	0.62	<0.20	<0.20	<0.20	
	2/18/2004	Farallon	0.3	< 0.20	<0.20	<0,20	
	5/10/2004	Farallon	2.8	0.25	0.37	<0.20	
	8/27/2004	Farallon	0.43	< 0.20	<0.20	< 0.20	
	8/13/2003	Farallon	7.4	0.27	0.42	<0.20	
	11/12/2003	Farallon	3.7	<0.20	<0.20	< 0.20	
	2/18/2004	Farallon	2.9	< 0.20	<0.20	<0.20	
	5/10/2004	Farallon	2.5	<0.20	<0.20	<0.20	
MWO	8/27/2004	Farallon	3.0	<0.20	<0.20	<0.20	
141 44-3	2/15/2006	Farallon	2.5	<0.20	<0.20	< 0.20	
	8/23/2006	Farallon	1.6	<0.20	<0.20	<0.20	
	11/21/2006	Farallon	2.1	< 0.20	< 0.20	<0,20	
	2/28/2007	Farallon	2.4	<0.20	< 0.20	< 0.20	
	5/15/2007	Farallon	1.8	< 0.20	<0.20	<0.20	
MW-10	6/22/2007	Farallon	7.4	0.48	< 0.20	< 0.20	
Field Duplicate Sample	25						
MW1-FD-112106	11/21/2006	Farallon	4.6	0.24	<0.20	<0.20	
MW2-FD-022807	2/28/2006	Farallon	0.86	<0.20	< 0.20	<0.20	
MW3-FD-051507	5/15/2007	Farallon	2.30	<0.20	<0.20	<0.20	
MTCA Cleanup Levels	i for Gronndwa	ter	5.0 ²	5.0 ²	د80	0.2 ²	

NOTES:

Results in BOLD indicate concentrations above Washington State Model Toxics Control Act Cleanup Regulation (MTCA) Method A cleanup levels. GeoEngineers = GeoEngineers, Inc. Farallon = Farallon Consulting, L.L.C.

< indicates analyte not detected at or above the laboratory practical quantitation limit shown.

¹ Analyzed by U.S. Environmental Protection Agency Method 8260D.

⁴ MTCA Chapter 173-340 of the Washington Administrative Code Method A cleanup levels for groundwater.

³ Cleanup Levels and Risk Calculations under MTCA, Version 3.1, Washington State Department of Ecology Publication No. 94-145, updated November 2001.

Table 4 Summary of Indoor Air Sample Results Cleaning Center of Redmond Redmond, Washington Farallon PN: 650-001

			Analytical Results (micrograms per cubic meter)		
Sample ID	Sample Location	Date Collected	Tetrachioroethene	Trichloroethene	
IA-i	Staple's Building, women's restroom - adjacent to the floor drain	6/12/2007	1.4	<0,19	
IA-2	Staple's Building, women's restroom - breathing zone	6/12/2007	1.4	<0.19	
NIOSH Recom	nended Exposure Limit ⁱ	NA ²	134,250 ³		
OSHA TWA Pe	rmissible Exposure Limits ⁴	678,000	537,000		
MTCA Standar	d Method B Formula Values for Air ⁵	NE	0.515		
Washington DC	H Background Concentration ⁶	5	0.7		

NOTES:

< Indicates compound not detected above the stated laboratory practical quantitation limit.

DOH = Washington State Department of Health

¹National Institute for Occupational Safety and Health (NIOSH) recommended exposure limit (REL) are a time-weighted average for a 10-hour workday NA = Not Applicable during a 40-hour workweek. NE = Not Established

²No numerical value established. The compound is a known carcinogen. NIOSH has a carcinogen policy which bases exposure limits for carcinogens on risk evaluations and potential exposures. NIOSH recommends minimization of workplace exposure concentration.

³NIOSH considers TCE to be a potential occupational careinogen and recommends an REL of 25 ppm (as a 10-hour TWA)

⁴OSHA permissible exposure limits (PEL) are time-weighted averages which must not be exceeded during any 8-hour workshift of a 40-hour workweek.

³Washington State Department of Ecology Model Toxics Control Act Cleanup Regulation (MTCA) Standard Method B Formula Values for ambient air, including both ambient outdoor air and air within structures.

⁶Washington State Department of Health (DOH) expressed indoor median background concentration.

APPENDIX A BORING LOGS

SITE CLOSURE REPORT Cleaning Center of Redmond 15796 Redmond Way Redmond, Washington

Farallon PN: 650-001

FARALLON CONSULTE 975 5th Avenue Northwes Issaquah, WA 98027	NG et	USCS Classification and Graphic Legend			
Major Divisions	USCS Graphic Symbol	USCS Letter Symbol	Lithologic Description		

Coarse- GRAVEL Grained AND Soil (More GRAVELLY than 50% SOII (More	GRAVEL	CLEAN GRAVEL (Little	O Par	GW	Well graded GRAVEL, well graded GRAVEL with sand
	or no intesy	8.8.	GP	Poorly graded GRAVEL, GRAVEL with sand	
of material	than 50% of	GRAVEL WITH FINES		GP-GM	Poorly graded GRAVEL - GRAVEL with sand and silt
than No.	fraction	fines)	888	GM	Silty GRAVEL
size)	No. 4 sieve)			GC	Clayey GRAVEL
	SAND AND	CLEAN SAND (Little or		SW	Well graded SAND
	SOIL (More	no mes)		SP	Poorly graded SAND
	coarse	SAND WITH FINES		SP-SM	Poorly graded SAND - silty SAND
	passed	fines)		SM	Silty SAND
	4 sieve)		///	SC	Clayey SAND
				SM-ML	SILT - Silty SAND
Fine- Grained	SILT AND			ML	SILT
Soil (More	limit less	ss 0)		CL	CLAY
of material	than 50y		111111	OL	Organic SILT
than No.	SILT AND			МН	Inorganic SILT
size)	limit greater		~~~	СН	Inorganic CLAY
1.01	than 50)		\sim	ОН	Organic CLAY
		Highly Organic Soil		PT	Peat
	PAVEMENT			AC	Asphalt concrete
				со	Concrete
	OTHER		\triangle	RK	Bedrock
			A CO	WD	Wood Debris
			17	DB	Debris (Miscellaneous)
				PC	Portland cement

	Sample Interval	Legend			
G	Grab Sample Interval	Cement Grout	Contact between units well defined.		
×	Water level at time of drilling	MMM Bentonite	Dashed line indicates gradational contact between units.		
×	Water level at time of sampling		feet bgs = feet below ground surface		
$\overline{\Box}$	Blank Casing	Sand Pack	NE = Not Encountered NA = Not Applicable		
Ē	Screened Casing	Well Cap	PID = Photoionization Detector PN = Project Number units = PID units calibrated to 100 ppm isobutylene		
E:\Forms\Boilerplate	es\LogPlot\Lithology\Coverpage		USCS = Unified Soil Classification System		

		FARALLON CONSULTING 975 5th Avenue Northwest Issaquah, WA 98027		Lo	g c	of I	Bor	ing:	FB-1		Page 1 of 1
Client: Nelson Real Estate Mngmnt Project: Cleaning Center of Redmond Location: Redmond, WA		Date/Time Starter Date/Time Compl Equipment: Drilling Company	d: leted: /:	6/1/0 6/1/0 Limit Case	07 12 07 02 ted A cade	25 00 ccess (Drilling	Sa Dri GP De Tol	mpler Type: 4 ive Hammer (Ib pth of Water A tal Boring Dep	4' Mac s.): TD (ft th (ft b	rocore 140 bgs): NA ogs): 10	
Lo	gg	ed By: J. Cyr	Drilling Foreman Drilling Method:		Jayn Geoj	nan L probe	auer 9	Tol	tal Well Depth	(ft bgs	5): NA
Depth (feet bgs.)	Sample Interval	Lithologic Descripti	on	USCS	USGS Graphic	% Recovery	Blow Counts 8/8/8	PID (units)	Sample ID	Sample Analyzed	Boring/Well Construction Details
0 - -		0-4" Concrete 4"-4' SAND, medium to coarse, with fine to coarse g moist, no odor.	C(jravel, brown,	SP		50	1	3.1	FB1-1	x	Concrete
-		4'-10' SAND, medium, with fine to coarse gravel, gre	ey, moist, no odor.	SP		80	i i	5.6	FB106	x	Bentonite
						100		8.1	FB1-10	x	
10 	men g Dia n Slo	It Type: NA Well ameter (inches): NA Filter Pack: ot Size (inches): NA Surface Sea	Construction Ir NA al: Concrete	nform	ation	n	Gra Top Bor	bund Su boof Cas	urface Elevation sing Elevation andonment:	n (ft): (ft):	NA NA Bentonite Chips

		FARALLON CONSULTING 975 5th Avenue Northwest Issaquah, WA 98027	Log of Boring: FB-2									
Cli Pro Lo Fa	Client: Nelson Real Estate Mngmnt Project: Cleaning Center of Redmond Location: Redmond, WA Farallon PN: 650-001		Date/Time Started Date/Time Compl Equipment: Drilling Company Drilling Foreman:	d: leted: /:	6/1/0 6/1/0 Limit Caso Jaym	rocore 140 bgs): NA bgs): 4 \$): NA						
Lo	gge	ed By: J. Cyr	Drilling Method:		Geop	orobe	1					
Depth (feet bgs.)	Sample Interval	Lithologic Descripti	ion	USCS	USGS Graphic	% Recovery	Blow Counts 8/8/8	PID (units)	Sample ID	Sample Analyzed	Boring/We Constructio Details	ell on
5		4"-4' SAND, fine to coarse, with fine to coarse grave moist, no odor.	CC	SP		50		8.5	FB2-1	x	Bentonit	e
Monu Casin Scree Scree	ment g Dia n Slo ned I	t Type: NA Well ameter (inches): NA Filter Pack: ot Size (inches): NA Surface Sea nterval (ft bgs): NA Annular Sea	Construction In NA al: Concrete al: Bentonite Chips	Iforma	ation	eyed	Gro Top Bori Locati	und Su of Cas ng Aba on: X	Irface Elevation ing Elevation (i Indonment: : NA	(ft): ft): Y: N	NA NA Bentonite Chip A	os

	1	975 5th Avenue Northwest Issaquah, WA 98027		-0	go	of E	Bor	ing:	FB-3		Page 1 of 1	
Client: Nelson Real Estate Mngmnt Project: Cleaning Center of Redmond Location: Redmond, WA		Date/Time Started: 6/12/07 00 Date/Time Completed: 6/12/07 00 Equipment: Limited Ad Date/Time Completed: 0			2830Sampler Type:4' Macrocore2930Drive Hammer (lbs.):140Access GPDepth of Water ATD (ft bgs):10							
Fa	rall	on PN: 650-001	Drilling Foreman:		Jayn	nan L	auer	Tot	tal Well Depth (ft bgs	s): NA	
Lo	gg	ed By: J. Cyr	Drilling Method:		Hand		er/Geo	probe		-		
Depth (feet bgs.)	Sample Interval	Lithologic Descripti	ion	USCS	USGS Graphic	% Recovery	Blow Counts 8/8/8	PID (units)	Sample ID	Sample Analyzed	Boring/Well Constructior Details	
0		0-3" Asphalt.	ASF	HAL	F						Concrete	
	X	1'-1.5' SAND, medium, with fine gravel, brown, wet, (collected by hand auger).	sulfuric odor	SP 		100	4	0.0	FB3-1	x		
5—	X	6'-6.5' SAND, fine, minor silt, blackish-brown, moist, by hand auger).	no odor (collected	iP		100		0.1	FB3-6	x	Bentonite	
	X	8'-8.5' SAND, fine to medium, light greyish-brown, m pieces of wood (collected with hand auger). 8.5'-10' Same as above, wet at 10 feet below ground	oist, no odor, few S	p		100		0.0	FB3-8			
		wood. 10'-11' SAND, medium to coarse, with fine gravel, we no odor.	et, brownish-grey,			80	-	0.0	FB3-9	x		
nur	men g Dia	It Type: NA Well ameter (inches): NA Filter Pack: ot Size (inches): NA Surface Se:	Construction Info	orma	atio	n	Gro	ound Su o of Cas	urface Elevation	n (ft): (ft):	NA NA	

		Farallon Consulting 975 5th Avenue Northwest Issaquah, WA 98027	L	.0	g d	of E	Bor	ing:	FB-4		Page 1 of 1			
Cli Pro	en oje cat	t: Nelson Real Estate Mngmnt ct: Cleaning Center of Redmond tion: Redmond, WA	Date/Time Started: Date/Time Complete Equipment: Drilling Company:	d:	6/12/07 1000 Sampler Type: 4' Macrocore 6/12/07 1100 Drive Hammer (Ibs.): 140 Limited Access GP Depth of Water ATD (ft bgs): 10 Cascade Drilling Total Boring Depth (ft bgs): 12									
Fai	all	on PN: 650-001 ed Bv: J. Cvr	Drilling Foreman: Drilling Method:		Jayn Geol	nan L brobe	auer	Tot	al Well Depth (ft bgs): NA			
Depth (feet bgs.)	Sample Interval	Lithologic Descripti	on	USCS	USGS Graphic	% Recovery	3low Counts 8/8/8	alD (units)	Sample ID	ample Analyzed	Boring/Well Construction Details			
0		0-6" Concrete	CON						1	0	Concrete			
	X	6"-1' SAND, fine to coarse, minor fine gravel, browni no odor (collected by hand auger).	ish-orange, moist,	SP		100		0.0	FB4-0.5	x				
5	X	5'-5.9.5' SAND, fine to medium, trace fine gravel, ligh moist, no odor (collected by hand auger from 5' to 5. 9.5'-10' SAND, fine, light brown, moist, wet at 10', no 10'-11.75' Same as above, fine to medium sand.	nt greyish-brown, S 5'). o odor.	iP		100		0.0 0.0	FB4-5	x	Bentonite			
-	\wedge								FB4-7					
	$\langle \rangle$					100	÷.	0.0						
-	\mathbb{X}	11.75'-12' Gravelly SAND, medium to coarse sand, fi wet, no odor.	ne gravel, brown,			100	4	0.0	FB4-9	x	5			
onu asin cree	men g Di n SI ned	t Type: NA Well ameter (inches): NA Filter Pack: ot Size (inches): NA Surface Sea Interval (ft bgs): NA Annular Sea	Construction Info NA al: Concrete al: Bentonite Chins	orma	atio	n veved	Gro Top Bor	ound Su o of Cas ing Aba ion: ¥	Inface Elevation Sing Elevation (Andonment: : NA	n (ft): (ft): Y: N	NA NA Bentonite Chip			

		FARALLON CONSULTING 975 5th Avenue Northwest Issaquah, WA 98027		Lo	g c	of E	Bori	ing:	FB-5			Page 1 of 1
Cli Pro Lo Fa	en oje cat rall	t: Nelson Real Estate Mngmnt ct: Cleaning Center of Redmond ion: Redmond, WA on PN: 650-001	Date/Time Started Date/Time Compl Equipment: Drilling Company Drilling Foreman:	6/12/ 6/12/ Limit Caso Jaym	07 1 07 1 ed A ade an L	105 140 ccess C Drilling auer	Saı Dri GP Dej Tot Tot	mpler Type: 4 ve Hammer (Ib oth of Water AT al Boring Dept al Well Depth (Type: 4' Macrocore nmer (Ibs.): 140 Water ATD (ft bgs): NA ing Depth (ft bgs): 8 Il Depth (ft bgs): NA			
Lo	gg	ed By: J. Cyr	Drilling Method:		Geop	probe						
Depth (feet bgs.)	Sample Interval	Lithologic Descripti	on	uscs	USGS Graphic	% Recovery	Blow Counts 8/8/8	PID (units)	Sample ID	Sample Analyzed	Bo Cor	ring/Well Istruction Details
0		0-4" Concrete 6"-3' Pea gravel.	CC	PLUG GP	8 8	80		0.1	FB5-0.5	x		Concrete
		3'-3.5' SAND, fine to medium, with fine to coarse gra brown, moist, no odor. 3.5'-4' Same as above, no gravel or silt, grey. 4'-8' Same as above, trace to minor silt.	vel, trace silt, dark	SP		90		0.3	FB5-3 FB5-5	×		Bentonite
10 —												
Monu Casir Scree Scree	imer ig Di en Sl ned	nt Type: NA Well ameter (inches): NA Filter Pack: ot Size (inches): NA Surface Sea Interval (ft bgs): NA Annular Sea	Construction Ir NA al: Concrete al: Bentonite Chips	nform	atior Surv	n veyed	Gro Top Bor Locat	ound Su o of Cas ring Aba tion: X	urface Elevation sing Elevation andonment: (: NA	n (ft): (ft): Y: N	NA NA Ben	tonite Chips

		975 5th Avenue Northwest Issaquah, WA 98027		Lo	go	of	Bori	ng:	MW-10			Page 1 of 1
Clic Pro	ent oje cat	 t: Nelson Real Estate Mngmnt ct: Cleaning Center of Redmond tion: Redmond, WA 	Date/Time Started Date/Time Compl Equipment: Drilling Company	d: leted: /:	0/07 0/07 575 cade	0745 0930 Drilling	Sar Dri ^s Dej Tot	npler Type: D ve Hammer (Ibs oth of Water AT al Boring Deptf	&M S: 5.): D (ft b n (ft b	S 18"x ogs): gs):	2" 300 16.5 26.5	
Fai	rall	on PN: 650-001	Drilling Foreman Drilling Method:		Jam Hollo	es G ow S	loebel tem Aug	Total Well Depth (ft bgs): er				25
LO	99	ea By: D. Clement		-	T					T		
Depth (feet bgs.)	Sample Interval	Lithologic Descripti	on	uscs	USGS Graphic	% Recovery	Blow Counts 8/8/6	PID (units)	Sample ID	Sample Analyzed	Bo Cor	ring/Well Instruction Details
0 - -												Cap Grout
- 5—		5'-6 5' SAND fine to coarse, with fine to coarse oray	el light brown	SW								Casing
1 I I	\bigtriangleup	medium dense, moist, no odor				100	12/15/16	673	MW10-6			Bentonite
- 10 - -	X	10'-11.5' SAND, fine to coarse, minor fine gravel and brown, medium dense, moist, no odor	d silt, dark reddish-	sw		100	15/15/14	754	MW10-11			
- 15 —		Sampler broke in boring, drill to 25 feet below group										Screen
1 1 1												T
- 20 -												Sand
- 25	X	25'-26.5' SAND, fine to coarse, mostly coarse, minor medium dense, wet, no odor	silt, dark brown,	SP		50	14/16/16	81.0	MW10-26			
Monu Casin Scree Scree	imer Ig D In Si ned	nt Type: Flush mount Well iameter (inches): 2 Filter Pack lot Size (inches): 0.010 Surface Se Interval (ft bos): 10-25 Annular Se	Construction In Sand al: Cement al: Bentonite	nform	natio	n	Gro Top Bor	und Si of Cas ing Ab	urface Elevation sing Elevation (andonment:		NA NA NA	
APPENDIX B LABORATORY ANALYTICAL REPORTS

SITE CLOSURE REPORT Cleaning Center of Redmond 15796 Redmond Way Redmond, Washington

Farallon PN: 650-001



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

May 21, 2007

Jennifer Cyr Farallon Consulting, LLC 975 5^{lh} Avenue NW Issaquah, WA 98027

Re: Analytical Data for Project 650-001 Laboratory Reference No. 0705-139

Dear Jennifer:

Enclosed are the analytical results and associated quality control data for samples submitted on May 15, 2007.

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

Case Narrative

Samples were collected on May 15, 2007 and received by the laboratory on May 15, 2007. They were maintained at the laboratory at a temperature of 2°C to 6°C except as 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.

HALOGENATED VOLATILES by EPA 8260B page 1 of 2

Date Extracted:	5-16-07	
Date Analyzed:	5-16-07	
Matrix:	Water	
Units:	ug/L (ppb)	
Lab ID:	05-139-01	

	00 100 01
Client ID:	MW3-051507

Compound	Results	Flags	PQL
Dichlorodifluoromethane	ND		0.20
Chloromethane	ND		0.20
Vinyl Chloride	ND		0.20
Bromomethane	ND		0.20
Chloroethane	ND		0.20
Trichlorofluoromethane	ND		0.20
1,1-Dichloroethene	ND		0.20
lodomethane	ND		1.0
Methylene Chloride	ND		1.0
(trans) 1,2-Dichloroethene	ND		0.20
1,1-Dichloroethane	ND		0.20
2,2-Dichloropropane	ND		0.20
(cis) 1,2-Dichloroethene	ND		0.20
Bromochloromethane	ND		0.20
Chloroform	ND		0.20
1,1,1-Trichloroethane	ND		0.20
Carbon Tetrachloride	ND		0.20
1,1-Dichloropropene	ND		0.20
1,2-Dichloroethane	ND		0.20
Trichloroethene	ND		0.20
1,2-Dichloropropane	ND		0.20
Dibromomethane	ND		0.20
Bromodichloromethane	ND		0.20
2-Chloroethyl Vinyl Ether	ND		1.0
(cis) 1,3-Dichloropropene	ND		0.20
(trans) 1,3-Dichloropropene	ND		0.20

HALOGENATED VOLATILES by EPA 8260B page 2 of 2

Lab ID:	05-139-01
Client ID:	MW3-051507

Compound	Results	Flags	PQL
1,1,2-Trichloroethane	ND		0.20
Tetrachloroethene	2.5		1.0
1,3-Dichloropropane	ND		0.20
Dibromochloromethane	ND		0.20
1,2-Dibromoethane	ND		0.20
Chlorobenzene	ND		0.20
1,1,1,2-Tetrachloroethane	ND		0.20
Bromoform	ND		1.0
Bromobenzene	ND		0.20
1,1,2,2-Tetrachloroethane	ND		0.20
1,2,3-Trichloropropane	ND		0.20
2-Chiorotoluene	ND		0.20
4-Chlorotoluene	ND		0.20
1,3-Dichlorobenzene	ND		0.20
1,4-Dichlorobenzene	ND		0.20
1,2-Dichlorobenzene	ND		0.20
1,2-Dibromo-3-chloropropane	ND		1.0
1,2,4-Trichlorobenzene	ND		0.20
Hexachlorobutadiene	ND		0.20
1,2,3-Trichlorobenzene	ND		0.20

	Percent	Control
Surrogate	Recovery	Limits
Dibromofluoromethane	84	71-126
Toluene, d8	91	76- 1 16
4-Bromofluorobenzene	89	70-123

HALOGENATED VOLATILES by EPA 8260B page 1 of 2

Date Extracted:	5-16-07		
Date Analyzed:	5-16-07		
Matrix:	Water		
Units:	ug/L (ppb)		
Lab ID:	05-139-02		

-40 1-1	··· · · · · · · · · · · · · · · · · ·
Client ID:	MW7-051507

Compound	Results	Flags	PQL
Dichlorodifluoromethane	ND		0.20
Chloromethane	ND		0.20
Vinyl Chloride	ND		0.20
Bromomethane	ND		0.20
Chloroethane	ND		0.20
Trichlorofluoromethane	ND		0.20
1,1-Dichloroethene	ND		0.20
lodomethane	ND		1.0
Methylene Chloride	ND		1.0
(trans) 1,2-Dichloroethene	ND		0.20
1,1-Dichloroethane	ND		0.20
2,2-Dichloropropane	ND		0.20
(cis) 1,2-Dichloroethene	ND		0.20
Bromochloromethane	ND		0.20
Chloroform	0.48		0.20
1,1,1-Trichloroethane	ND		0.20
Carbon Tetrachloride	ND		0.20
1,1-Dichloropropene	ND		0.20
1,2-Dichloroethane	ND		0.20
Trichloroethene	ND		0.20
1,2-Dichloropropane	ND		0,20
Dibromomethane	ND		0.20
Bromodichloromethane	ND		0.20
2-Chloroethyl Vinyl Ether	ND		1.0
(cis) 1,3-Dichloropropene	ND		0.20
(trans) 1,3-Dichloropropene	ND		0.20

HALOGENATED VOLATILES by EPA 8260B page 2 of 2

Lab ID:	05-139-02
Client ID:	MW7-051507

Results	Flags	PQL
ND		0.20
2.9		1.0
ND		0.20
ND		1.0
ND		0.20
ND		1.0
ND		0.20
ND		0.20
ND		0.20
	Results ND 2.9 ND ND ND ND ND ND ND ND ND ND ND ND ND	Results Flags ND 2.9 ND ND ND

	Percent	Control
Surrogate	Recovery	Limits
Dibromofluoromethane	85	71-126
Toluene, d8	90	76-116
4-Bromofluorobenzene	89	70-123

HALOGENATED VOLATILES by EPA 8260B page 1 of 2

Date Extracted:	5-16-07		
Date Analyzed:	5-16-07		
Matrix:	Water		
Units:	ug/L (ppb)		
Lab ID:	05-139-03		

Client ID:	MW2-051507

Compound	Results	Flags	PQL
Dichlorodifluoromethane	ND		0.20
Chloromethane	ND		0.20
Vinyl Chloride	ND		0.20
Bromomethane	ND		0.20
Chloroethane	ND		0.20
Trichlorofluoromethane	ND		0.20
1,1-Dichloroethene	ND		0.20
lodomethane	ND		1.0
Methylene Chloride	ND		1.0
(trans) 1.2-Dichloroethene	ND		0.20
1,1-Dichloroethane	ND		0.20
2,2-Dichloropropane	ND		0.20
(cis) 1,2-Dichloroethene	ND		0.20
Bromochloromethane	ND		0.20
Chloroform	0.49		0.20
1,1,1-Trichloroethane	ND		0.20
Carbon Tetrachloride	ND		0.20
1,1-Dichloropropene	ND		0.20
1,2-Dichloroethane	ND		0.20
Trichloroethene	ND		0.20
1,2-Dichloropropane	ND		0.20
Dibromomethane	ND		0.20
Bromodichloromethane	ND		0.20
2-Chloroethyl Vinyl Ether	ND		1.0
(cis) 1,3-Dichloropropene	ND		0.20
(trans) 1,3-Dichloropropene	ND		0.20

HALOGENATED VOLATILES by EPA 8260B page 2 of 2

PQL 0.20 1.0 0.20 0.20 0.20 0.20 0.20 1.0 0.20 0.20 0.20 0.20 0.20 0.20 0.20 0.20 1.0 0.20 0.20 0.20

Lab ID: Client ID:	05-139-03 MW2-051507		
Compound		Results	Flags
1,1,2-Trichloroethane		ND	
Tetrachloroethene		1.3	
1,3-Dichloropropane		ND	
Dibromochloromethane		ND	
1,2-Dibromoethane		ND	
Chlorobenzene		ND	
1,1,1,2-Tetrachloroethane		ND	
Bromoform		ND	
Bromobenzene		ND	
1,1,2,2-Tetrachloroethane		ND	
1,2,3-Trichloropropane		ND	
2-Chlorotoluene		ND	
4-Chlorotoluene		ND	
1,3-Dichlorobenzene		ND	
1,4-Dichlorobenzene		ND	
1,2-Dichlorobenzene		ND	
1,2-Dibromo-3-chloropropane	e	ND	
1,2,4-Trichlorobenzene		ND	
Hexachlorobutadiene		ND	
1,2,3-Trichlorobenzene		ND	

	Percent	Control
Surrogate	Recovery	Limits
Dibromofluoromethane	85	71-12 6
Toluene, d8	89	76-116
4-Bromofluorobenzene	89	70-123

HALOGENATED VOLATILES by EPA 8260B page 1 of 2

Date Extracted:	5-16-07
Date Analyzed:	5-16-07
Matrix:	Water
Units:	ug/L (ppb)
Lab ID:	05-139-04

Client ID:	MW1-051507

Compound	Results	Flags	PQL
Dichlorodifluoromethane	ND		0.20
Chloromethane	ND		0.20
Vinyl Chloride	ND		0.20
Bromomethane	ND		0.20
Chloroethane	ND		0.20
Trichlorofluoromethane	ND		0.20
1,1-Dichloroethene	ND		0.20
lodomethane	ND		1.0
Methylene Chloride	ND		10
(trans) 1,2-Dichloroethene	ND		0.20
1,1-Dichloroethane	ND		0.20
2,2-Dichloropropane	ND		0.20
(cis) 1,2-Dichloroethene	ND		0.20
Bromochloromethane	ND		0.20
Chloroform	0.26		0.20
1,1,1-Trichloroethane	ND		0.20
Carbon Tetrachloride	ND		0.20
1,1-Dichloropropene	ND		0.20
1,2-Dichloroethane	ND		0.20
Trichloroethene	ND		0.20
1,2-Dichloropropane	ND		0.20
Dibromomethane	ND		0.20
Bromodichloromethane	ND		0.20
2-Chloroethyl Vinyl Ether	ND		1.0
(cis) 1,3-Dichloropropene	ND		0.20
(trans) 1,3-Dichloropropene	ND		0.20

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HALOGENATED VOLATILES by EPA 8260B page 2 of 2

Lab ID:	05-139-04
Client ID:	MW1-051507

Compound	Results	Flags	PQL
1,1,2-Trichloroethane	ND		0.20
Tetrachloroethene	3.3		1.0
1,3-Dichloropropane	ND		0.20
Dibromochloromethane	ND		0.20
1,2-Dibromoethane	ND		0.20
Chlorobenzene	ND		0.20
1,1,1,2-Tetrachloroethane	ND		0.20
Bromoform	ND		1.0
Bromobenzene	ND		0.20
1,1,2,2-Tetrachloroethane	ND		0.20
1,2,3-Trichloropropane	ND		0.20
2-Chlorotoluene	ND		0.20
4-Chlorotoluene	ND		0.20
1,3-Dichlorobenzene	ND		0.20
1,4-Dichlorobenzene	ND		0.20
1,2-Dichlorobenzene	ND		0.20
1,2-Dibromo-3-chloropropane	ND		1.0
1,2,4-Trichlorobenzene	ND		0.20
Hexachlorobutadiene	ND		0.20
1,2,3-Trichlorobenzene	ND		0.20

	Percent	Control
Surrogate	Recovery	Limits
Dibromofluoromethane	85	71-126
Toluene, d8	91	76-116
4-Bromofluorobenzene	88	70-123

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HALOGENATED VOLATILES by EPA 8260B page 1 of 2

Date Extracted:	5-1 6- 07
Date Analyzed:	5-16-07
Matrix:	Water
Units:	ug/L (ppb)
Lab ID:	05-139-05

Client ID:	MW9-051507

Compound	Results	Flags	PQL
Dichlorodifluoromethane	ND		0.20
Chloromethane	ND		0.20
Vinyl Chloride	ND		0.20
Bromomethane	ND		0.20
Chloroethane	ND		0.20
Trichlorofluoromethane	ND		0.20
1,1-Dichloroethene	ND		0.20
lodomethane	ND		1.0
Methylene Chloride	ND		1.0
(trans) 1,2-Dichloroethene	ND		0.20
1,1-Dichloroethane	ND		0.20
2,2-Dichloropropane	ND		0.20
(cis) 1,2-Dichloroethene	ND		0.20
Bromochloromethane	ND		0.20
Chloroform	0.51		0.20
1,1,1-Trichloroethane	ND		0.20
Carbon Tetrachloride	ND		0.20
1,1-Dichloropropene	ND		0.20
1,2-Dichloroethane	ND		0.20
Trichloroethene	ND		0.20
1,2-Dichloropropane	ND		0.20
Dibromomethane	ND		0.20
Bromodichloromethane	ND		0.20
2-Chloroethyl Vinyl Ether	ND		1.0
(cis) 1,3-Dichloropropene	ND		0.20
(trans) 1,3-Dichloropropene	ND		0.20

HALOGENATED VOLATILES by EPA 8260B page 2 of 2

Lab ID:	05-139-05
Client ID:	MW9-051507

Compound	Results	Flags	PQL
1,1,2-Trichloroethane	ND		0.20
Tetrachloroethene	1.8		1.0
1,3-Dichloropropane	ND		0.20
Dibromochloromethane	ND		0.20
1,2-Dibromoethane	ND		0.20
Chlorobenzene	ND		0.20
1,1,1,2-Tetrachloroethane	ND		0.20
Bromoform	ND		1.0
Bromobenzene	ND		0.20
1,1,2,2-Tetrachloroethane	ND		0.20
1,2,3-Trichloropropane	ND		0.20
2-Chlorotoluene	ND		0.20
4-Chlorotoluene	ND		0.20
1,3-Dichlorobenzene	ND		0.20
1,4-Dichlorobenzene	ND		0.20
1,2-Dichlorobenzene	ND		0.20
1,2-Dibromo-3-chloropropane	ND		1.0
1,2,4-Trichlorobenzene	ND		0.20
Hexachlorobutadiene	ND		0.20
1,2,3-Trichlorobenzene	ND		0.20

	Percent	Control
Surrogate	Recovery	Limits
Dibromofluoromethane	85	71-126
Toluene, d8	90	76-116
4-Bromofluorobenzene	90	70-123

HALOGENATED VOLATILES by EPA 8260B page 1 of 2

Date Extracted:	5-16-07
Date Analyzed:	5-16-07
Matrix:	Water
Units:	ug/L (ppb)

Lab ID:	05-139-06
Client ID:	MW3-FD-051507

Compound	Results	Flags	PQL
Dichlorodifluoromethane	ND		0.20
Chloromethane	ND		0.20
Vinyl Chloride	ND		0.20
Bromomethane	ND		0.20
Chloroethane	ND		0.20
Trichlorofluoromethane	ND		0.20
1,1-Dichloroethene	ND		0.20
lodomethane	ND		1.0
Methylene Chloride	ND		1.0
(trans) 1,2-Dichloroethene	ND		0.20
1,1-Dichloroethane	ND		0.20
2,2-Dichloropropane	ND		0.20
(cis) 1,2-Dichloroethene	ND		0.20
Bromochloromethane	ND		0.20
Chloroform	ND		0.20
1,1,1-Trichloroethane	ND		0.20
Carbon Tetrachloride	ND		0.20
1,1-Dichloropropene	ND		0.20
1,2-Dichloroethane	ND		0.20
Trichloroethene	ND		0.20
1,2-Dichloropropane	ND		0.20
Dibromomethane	ND		0.20
Bromodichloromethane	ND		0.20
2-Chloroethyl Vinyl Ether	ND		1.0
(cis) 1,3-Dichloropropene	ND		0.20
(trans) 1,3-Dichloropropene	ND		0.20

HALOGENATED VOLATILES by EPA 8260B page 2 of 2

Lab ID:	05-139-06
Client ID:	MW3-FD-051507

Compound	Results	Flags	PQL
1,1,2-Trichloroethane	ND		0 20
Tetrachloroethene	2.3		1.0
1,3-Dichloropropane	ND		0.20
Dibromochloromethane	ND		0.20
1,2-Dibromoethane	ND		0.20
Chlorobenzene	ND		0.20
1,1,1,2-Tetrachloroethane	ND		0.20
Bromoform	ND		1.0
Bromobenzene	ND		0.20
1,1,2,2-Tetrachloroethane	ND		0.20
1,2,3-Trichloropropane	ND		0.20
2-Chlorotoluene	ND		0.20
4-Chlorotoluene	ND		0.20
1,3-Dichlorobenzene	ND		0.20
1,4-Dichlorobenzene	ND		0.20
1,2-Dichlorobenzene	ND		0.20
1,2-Dibromo-3-chloropropane	ND		1.0
1,2,4-Trichlorobenzene	ND		0.20
Hexachlorobutadiene	ND		0.20
1,2,3-Trichlorobenzene	ND		0.20

	Percent	Control
Surrogate	Recovery	Limits
Dibromofluoromethane	84	71-126
Toluene, d8	90	76-116
4-Bromofluorobenzene	88	70-123

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HALOGENATED VOLATILES by EPA 8260B METHOD BLANK QUALITY CONTROL page 1 of 2

Date Extracted:	5-16-07
Date Analyzed:	5-16-07
Matrix:	Water
Units:	ug/L (ppb)

Lab ID: MB0516W1

Compound	Results	Flags	PQL
Dichlorodifluoromethane	ND		0.20
Chloromethane	ND		0.20
Vinyl Chloride	ND		0.20
Bromomethane	ND		0.20
Chloroethane	ND		0.20
Trichlorofluoromethane	ND		0.20
1,1-Dichloroethene	ND		0.20
lodomethane	ND		1.0
Methylene Chloride	ND		1.0
(trans) 1,2-Dichloroethene	ND		0.20
1,1-Dichloroethane	ND		0.20
2,2-Dichloropropane	ND		0.20
(cis) 1,2-Dichloroethene	ND		0.20
Bromochloromethane	ND		0.20
Chloroform	ND		0.20
1,1,1-Trichloroethane	ND		0.20
Carbon Tetrachloride	ND		0.20
1,1-Dichloropropene	ND		0.20
1,2-Dichloroethane	ND		0.20
Trichloroethene	ND		0.20
1,2-Dichloropropane	ND		0.20
Dibromomethane	ND		0.20
Bromodichloromethane	ND		0.20
2-Chloroethyl Vinyl Ether	ND		1.0
(cis) 1,3-Dichloropropene	ND		0.20
(trans) 1,3-Dichloropropene	ND		0.20

HALOGENATED VOLATILES by EPA 8260B METHOD BLANK QUALITY CONTROL page 2 of 2

Lab ID:

MB0516W1

Compound	Results	Flags	PQL
1,1,2-Trichloroethane	ND		0.20
Tetrachloroethene	ND		1.0
1,3-Dichloropropane	ND		0.20
Dibromochloromethane	ND		0.20
1,2-Dibromoethane	ND		0.20
Chlorobenzene	ND		0.20
1,1,1,2-Tetrachloroethane	ND		0.20
Bromoform	ND		1.0
Bromobenzene	ND		0.20
1,1,2,2-Tetrachloroethane	ND		0.20
1,2,3-Trichloropropane	ND		0.20
2-Chlorotoluene	ND		0.20
4-Chlorotoluene	ND		0.20
1,3-Dichlorobenzene	ND		0.20
1,4-Dichlorobenzene	ND		0.20
1,2-Dichlorobenzene	ND		0.20
1,2-Dibromo-3-chloropropane	ND		1.0
1,2,4-Trichlorobenzene	ND		0.20
Hexachlorobutadiene	ND		0.20
1,2,3-Trichlorobenzene	ND		0.20

	Percent	Control
Surrogate	Recovery	Limits
Dibromofluoromethane	87	71-126
Toluene, d8	89	76-116
4-Bromofluorobenzene	89	70-123

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HALOGENATED VOLATILES by EPA 8260B SB/SBD QUALITY CONTROL

Date Extracted:	5-16-07
Date Analyzed:	5-16-07

Matrix:	Water
Units:	ug/L (ppb)

Lab ID: SB0516W1

Compound	Spike Amount	SB	Percent Recovery	SBD	Percent Recovery	Recovery Limits	Flags
1,1-Dichloroethene	10.0	8.48	85	8.58	86	70-130	
Benzene	10.0	8.51	85	8.80	88	70-130	
Trichloroethene	10.0	9.62	96	9 58	96	70-116	
Toluene	10.0	9.25	93	9.40	94	76-119	
Chiorobenzene	10.0	8.93	89	8.90	89	77-112	

	RPD		
	RPD	Limit	Flags
1,1-Dichloroethene	1	20	
Benzene	3	16	
Trichloroethene	0	16	
Toluene	2	15	
Chlorobenzene	0	15	



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 (toluene-napthalene) are present in the sample.

O - Hydrocarbons indicative of diesel fuel 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 diesel range PQL is elevated due to the presence of lube oil range hydrocarbons.
- 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 silica gel cleanup procedure.

Y - Sample extract treated with an acid/silica gel cleanup procedure

Z -

ND - Not Detected at PQL

PQL - Practical Quantitation Limit

RPD - Relative Percent Difference

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Environmental Inc.	Turnaround (in workin	l Request Ig days)	La	bor	ato	ry∣	Nur	nbe	э г :							δ	5-	- 1	Ş.	ð		
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June 7, 2007

Jennifer Cyr Farallon Consulting, LLC 975 5th Avenue NW Issaquah, WA 98027

Re: Analytical Data for Project 650-001 Laboratory Reference No. 0706-002

Dear Jennifer:

Enclosed are the analytical results and associated quality control data for samples submitted on June 1, 2007.

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

Case Narrative

Samples were collected on June 1, 2007 and received by the laboratory on June 1, 2007. They were maintained at the laboratory at a temperature of 2°C to 6°C except as 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.

Halogenated Volatiles EPA 8260B Analysis

Per EPA Method 5035A, samples were received by the laboratory in pre-weighed 40 mL VOA vials within 48 hours of sample collection. They were stored in a freezer at between -7°C and -20°C until extraction or analysis.

Any other QA/QC issues associated with this extraction and analysis will be indicated with a footnote reference and discussed in detail on the Data Qualifier page.

HALOGENATED VOLATILES by EPA 8260B page 1 of 2

Date Extracted:	6-1-07
Date Analyzed:	6-1-07
Matrix:	Soil
Units:	mg/kg (ppm)
Lab ID:	06-002-01
Client ID:	FB1-1

Compound	Results	Flags	PQL
Dichlorodifluoromethane	ND		0.0012
Chloromethane	ND		0.0012
Vinyl Chloride	ND		0.0012
Bromomethane	ND		0.0059
Chloroethane	ND		0.0012
Trichlorofluoromethane	ND		0.0012
1,1-Dichloroethene	ND		0.0012
lodomethane	ND		0.0059
Methylene Chloride	ND		0.0059
(trans) 1,2-Dichloroethene	ND		0.0012
1,1-Dichloroethane	ND		0.0012
2,2-Dichloropropane	ND		0.0012
(cis) 1,2-Dichloroethene	ND		0.0012
Bromochloromethane	ND		0.0012
Chloroform	ND		0.0012
1,1,1-Trichloroethane	ND		0.0012
Carbon Tetrachloride	ND		0.0012
1,1-Dichloropropene	ND		0.0012
1,2-Dichloroethane	ND		0.0012
Trichloroethene	ND		0.0012
1,2-Dichloropropane	ND		0.0012
Dibromomethane	ND		0.0012
Bromodichloromethane	ND		0.0012
2-Chloroethyl Vinyl Ether	ND		0.0059
(cis) 1,3-Dichloropropene	ND		0.0012
(trans) 1,3-Dichloropropene	ND		0.0012

HALOGENATED VOLATILES by EPA 8260B page 2 of 2

Lab ID:	06-002-01			
Client ID:	FB1 - 1			
Compound		Results	Flags	PQL
1,1,2-Trichloroethane		ND		0.0012
Tetrachloroethene		0.0043		0.0012
1,3-Dichloropropane		ND		0.0012
Dibromochloromethane		ND		0.0012
1,2-Dibromoethane		ND		0.0012
Chlorobenzene		ND		0.0012
1,1,1,2-Tetrachloroethane		ND		0.0012
Bromoform		ND		0.0012
Bromobenzene		ND		0.0012
1,1,2,2-Tetrachloroethane		ND		0.0012
1,2,3-Trichloropropane		ND		0.0012
2-Chlorotoluene		ND		0.0012
4-Chlorotoluene		ND		0.0012
1,3-Dichlorobenzene		ND		0.0012
1,4-Dichlorobenzene		ND		0.0012
1,2-Dichlorobenzene		ND		0.0012
1,2-Dibromo-3-chloropropar	ne	ND		0.0059
1,2,4-Trichlorobenzene		ND		0.0012
Hexachlorobutadiene		ND		0.0059
1,2,3-Trichlorobenzene		ND		0.0012

	Percent	Control
Surrogate	Recovery	Limits
Dibromofluoromethane	84	70-118
Toluene, d8	83	70-121
4-Bromofluorobenzene	99	70-130

HALOGENATED VOLATILES by EPA 8260B page 1 of 2

Date Extracted:	6-1-07
Date Analyzed:	6-1-07
Matrix:	Soil
Units:	mg/kg (ppm)
Lab ID:	06-002-02

Client ID:	FB1-6
Attern in the	1 1 1 1 1 1 1

Compound	Results	Flags	PQL
Dichlorodifluoromethane	ND		0.0013
Chloromethane	ND		0.0013
Vinyl Chloride	ND		0.0013
Bromomethane	ND		0.0067
Chloroethane	ND		0.0013
Trichlorofluoromethane	ND		0.0013
1,1-Dichloroethene	ND		0.0013
lodomethane	ND		0.0067
Methylene Chloride	ND		0.0067
(trans) 1,2-Dichloroethene	ND		0.0013
1,1-Dichloroethane	ND		0.0013
2,2-Dichloropropane	ND		0.0013
(cis) 1,2-Dichloroethene	ND		0.0013
Bromochloromethane	ND		0.0013
Chloroform	ND		0.0013
1,1,1-Trichloroethane	ND		0.0013
Carbon Tetrachloride	ND		0.0013
1,1-Dichloropropene	ND		0.0013
1,2-Dichloroethane	ND		0.0013
Trichloroethene	ND		0.0013
1,2-Dichloropropane	ND		0.0013
Dibromomethane	ND		0.0013
Bromodichloromethane	ND		0.0013
2-Chloroethyl Vinyl Ether	ND		0.0067
(cis) 1,3-Dichloropropene	ND		0.0013
(trans) 1,3-Dichloropropene	ND		0.0013

HALOGENATED VOLATILES by EPA 8260B page 2 of 2

Lab ID: Client ID:	06-002-02 FB1-6			
Compound		Results	Flags	PQI.
1,1,2-Trichloroethane		ND		0.0013
Tetrachloroethene		0.0021		0.0013
1,3-Dichloropropane		ND		0.0013
Dibromochloromethane		ND		0.0013
1,2-Dibromoethane		ND		0.0013
Chlorobenzene		ND		0.0013
1,1,1,2-Tetrachloroethane		ND		0.0013
Bromoform		ND		0.0013
Bromobenzene		ND		0.0013
1,1,2,2-Tetrachloroethane		ND		0.0013
1,2,3-Trichloropropane		ND		0.0013
2-Chlorotoluene		ND		0.0013
4-Chlorotoluene		ND		0.0013
1,3-Dichlorobenzene		ND		0.0013
1,4-Dichlorobenzene		ND		0.0013
1,2-Dichlorobenzene		ND		0.0013
1,2-Dibromo-3-chloropropane	9	ND		0.0067
1,2,4-Trichlorobenzene		ND		0.0013
Hexachlorobutadiene		ND		0.0067
1,2,3-Trichlorobenzene		ND		0.0013

	Percent	Control	
Surrogate	Recovery	Limits	
Dibromofluoromethane	89	70-118	
Toluene, d8	80	70-121	
4-Bromofluorobenzene	99	70-130	

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HALOGENATED VOLATILES by EPA 8260B page 1 of 2

Date Extracted:	6-1-07
Date Analyzed:	6-1-07
Matrix:	Soil
Units:	mg/kg (ppm)
Lab ID:	06-002-03

Client ID: FB1-10

Compound	Results	Flags	PQL
Dichlorodifluoromethane	ND		0.0013
Chloromethane	ND		0.0013
Vinyl Chloride	ND		0.0013
Bromomethane	ND		0.0064
Chloroethane	ND		0.0013
Trichlorofluoromethane	ND		0.0013
1,1-Dichloroethene	ND		0.0013
lodomethane	ND		0.0064
Methylene Chloride	ND		0.0064
(trans) 1,2-Dichloroethene	ND		0.0013
1,1-Dichloroethane	ND		0.0013
2,2-Dichloropropane	ND		0.0013
(cis) 1,2-Dichloroethene	ND		0.0013
Bromochloromethane	ND		0.0013
Chloroform	ND		0.0013
1,1,1-Trichloroethane	ND		0.0013
Carbon Tetrachloride	ND		0.0013
1,1-Dichloropropene	ND		0.0013
1,2-Dichloroethane	ND		0.0013
Trichloroethene	ND		0.0013
1,2-Dichloropropane	ND		0.0013
Dibromomethane	ND		0.0013
Bromodichloromethane	ND		0.0013
2-Chloroethyl Vinyl Ether	ND		0.0064
(cis) 1,3-Dichloropropene	ND		0.0013
(trans) 1,3-Dichloropropene	ND		0.0013

HALOGENATED VOLATILES by EPA 8260B page 2 of 2

Lab ID: Client ID:	06-002-03 FB1-10			
Compound		Results	Flags	PQL
1,1,2-Trichloroethane		ND		0.0013
Tetrachloroethene		0.0021		0.0013
1,3-Dichloropropane		ND		0.0013
Dibromochloromethane		ND		0.0013
1,2-Dibromoethane		ND		0.0013
Chlorobenzene		ND		0.0013
1,1,1,2-Tetrachloroethane		ND		0.0013
Bromoform		ND		0.0013
Bromobenzene		ND		0.0013
1,1,2,2-Tetrachloroethane		ND		0.0013
1,2,3-Trichloropropane		ND		0.0013
2-Chlorotoluene		ND		0.0013
4-Chlorotoluene		ND		0.0013
1,3-Dichlorobenzene		ND		0.0013
1,4-Dichlorobenzene		ND		0.0013
1,2-Dichlorobenzene		ND		0.0013
1,2-Dibromo-3-chloropropane	9	ND		0.0064
1,2,4-Trichlorobenzene		ND		0.0013
Hexachlorobutadiene		ND		0.0064
1,2,3-Trichlorobenzene		ND		0.0013

	Percent	Control
Surrogate	Recovery	Limits
Dibromofluoromethane	85	70-118
Toluene, d8	85	70-121
4-Bromofluorobenzene	93	70-130

HALOGENATED VOLATILES by EPA 8260B page 1 of 2

Date Extracted:	6-1-07
Date Analyzed:	6-1-07
Matrix:	Soil
Units:	mg/kg (ppm)
Lab ID:	06-002-04

Client ID: FB2-1

Compound	Results	Flags	PQL
Dichlorodifluoromethane	ND		0.0011
Chloromethane	ND		0.0011
Vinyl Chloride	ND		0.0011
Bromomethane	ND		0.0054
Chloroethane	ND		0.0011
Trichlorofluoromethane	ND		0.0011
1,1-Dichloroethene	ND		0.0011
lodomethane	ND		0.0054
Methylene Chloride	ND		0.0054
(trans) 1,2-Dichloroethene	ND		0.0011
1,1-Dichloroethane	ND		0.0011
2,2-Dichloropropane	ND		0.0011
(cis) 1,2-Dichloroethene	ND		0.0011
Bromochloromethane	ND		0.0011
Chloroform	ND		0.0011
1,1,1-Trichloroethane	ND		0.0011
Carbon Tetrachloride	ND		0.0011
1,1-Dichloropropene	ND		0.0011
1,2-Dichloroethane	ND		0.0011
Trichloroethene	ND		0.0011
1,2-Dichloropropane	ND		0.0011
Dibromomethane	ND		0.0011
Bromodichloromethane	ND		0.0011
2-Chloroethyl Vinyl Ether	ND		0.0054
(cis) 1,3-Dichloropropene	ND		0.0011
(trans) 1,3-Dichloropropene	ND		0.0011

HALOGENATED VOLATILES by EPA 8260B page 2 of 2

Lab ID:	06-002-04			
Client ID:	FB2-1			
Compound		Results	Flags	POL
1.1.2-Trichloroethane		ND	<u>9</u> -	0.0011
Tetrachloroethene		0.0059		0.0011
1,3-Dichloropropane		ND		0.0011
Dibromochloromethane		ND		0.0011
1,2-Dibromoethane		ND		0.0011
Chlorobenzene		ND		0.0011
1,1,1,2-Tetrachloroethane		ND		0.0011
Bromoform		ND		0.0011
Bromobenzene		ND		0.0011
1,1,2,2-Tetrachloroethane		ND		0.0011
1,2,3-Trichloropropane		ND		0.0011
2-Chlorotoluene		ND		0.0011
4-Chlorotoluene		ND		0.0011
1,3-Dichlorobenzene		ND		0.0011
1,4-Dichlorobenzene		ND		0.0011
1,2-Dichlorobenzene		ND		0.0011
1,2-Dibromo-3-chloropropane	9	ND		0.0054
1,2,4-Trichlorobenzene		ND		0.0011
Hexachlorobutadiene		ND		0.0054
1,2,3-Trichlorobenzene		ND		0.0011

	Percent	Control
Surrogate	Recovery	Limits
Dibromofluoromethane	92	70-118
Toluene, d8	81	70-121
4-Bromofluorobenzene	95	70-130

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HALOGENATED VOLATILES by EPA 8260B METHOD BLANK QUALITY CONTROL page 1 of 2

6-1-07
6-1-07
Soil

Units:	mg/kg (ppm)
omits.	mg/kg (ppm)

Lab ID: MB0601S1

Compound	Results	Flags	PQL
Dichlorodifluoromethane	ND		0.0010
Chloromethane	ND		0.0010
Vinyl Chloride	ND		0.0010
Bromomethane	ND		0.0050
Chloroethane	ND		0.0010
Trichlorofluoromethane	ND		0.0010
1,1-Dichloroethene	ND		0.0010
lodomethane	ND		0.0050
Methylene Chloride	ND		0.0050
(trans) 1,2-Dichloroethene	ND		0.0010
1,1-Dichloroethane	ND		0.0010
2,2-Dichloropropane	ND		0.0010
(cis) 1,2-Dichloroethene	ND		0.0010
Bromochloromethane	ND		0.0010
Chloroform	ND		0.0010
1,1,1-Trichloroethane	ND		0.0010
Carbon Tetrachloride	ND		0.0010
1,1-Dichloropropene	ND		0.0010
1,2-Dichloroethane	ND		0.0010
Trichloroethene	ND		0.0010
1,2-Dichloropropane	ND		0.0010
Dibromomethane	ND		0.0010
Bromodichloromethane	ND		0.0010
2-Chloroethyl Vinyl Ether	ND		0.0050
(cis) 1,3-Dichloropropene	ND		0.0010
(trans) 1,3-Dichloropropene	ND		0.0010

HALOGENATED VOLATILES by EPA 8260B METHOD BLANK QUALITY CONTROL page 2 of 2

Lab ID:

MB0601S1

Compound	Results	Flags	PQL
1,1,2-Trichloroethane	ND		0.0010
Tetrachloroethene	ND		0.0010
1,3-Dichloropropane	ND		0.0010
Dibromochloromethane	ND		0.0010
1,2-Dibromoethane	ND		0.0010
Chlorobenzene	ND		0.0010
1,1,1,2-Tetrachloroethane	ND		0.0010
Bromoform	ND		0.0010
Bromobenzene	ND		0.0010
1,1,2,2-Tetrachloroethane	ND		0.0010
1,2,3-Trichloropropane	ND		0.0010
2-Chlorotoluene	ND		0.0010
4-Chlorotoluene	ND		0.0010
1,3-Dichlorobenzene	ND		0.0010
1,4-Dichlorobenzene	ND		0.0010
1,2-Dichlorobenzene	ND		0.0010
1,2-Dibromo-3-chloropropane	ND		0.0050
1,2,4-Trichlorobenzene	ND		0.0010
Hexachlorobutadiene	ND		0.0050
1,2,3-Trichlorobenzene	ND		0.0010

	Percent	Control
Surrogate	Recovery	Limits
Dibromofluoromethane	83	70-118
Toluene, d8	84	70-121
4-Bromofluorobenzene	98	70-130

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HALOGENATED VOLATILES by EPA 8260B SB/SBD QUALITY CONTROL

Date Extracted:	6-1-07
Date Analyzed:	6-1-07

Matrix:	Soil
Units:	mg/kg (ppm)

Lab ID: SB0601S1

Compound	Spike Amount	SB	Percent Recovery	SBD	Percent Recovery	Recovery Limits	Flags
1,1-Dichloroethene	0.0500	0.0521	104	0.0543	109	70-130	
Benzene	0.0500	0.0547	109	0.0519	104	70-127	
Trichloroethene	0.0500	0.0553	111	0.0513	103	73-117	
Toluene	0.0500	0.0520	104	0.0560	112	78-115	
Chlorobenzene	0.0500	0.0509	102	0.0506	101	80-117	

		RPD	
	RPD	Limit	Flags
1,1-Dichloroethene	4	10	
Benzene	5	11	
Trichloroethene	7	13	
Toluene	7	12	
Chlorobenzene	1	10	

% MOISTURE

Date Analyzed: 6-1-07

Client ID	Lab ID	% Moisture
FB1-1	06-002-01	6
FB1-6	06-002-02	5
FB1-10	06-002-03	4
FB2-1	06-002-04	4

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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.

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 semple 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-napthalene) are present in the sample.

N - Hydrocarbons in the lube oil range are impacting the diesel range result.

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

Y - Sample extract treated with an acid/silica gel cleanup procedure.

Ζ-

ND - Not Detected at PQL PQL - Practical Quantitation Limit RPD - Relative Percent Difference

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June 20, 2007

Jennifer Cyr Farallon Consulting, LLC 975 5th Avenue NW Issaquah, WA 98027

Re: Analytical Data for Project 650-001 Laboratory Reference No. 0706-103

Dear Jennifer:

Enclosed are the analytical results and associated quality control data for samples submitted on June 12, 2007.

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

Case Narrative

Samples were collected on June 12, 2007 and received by the laboratory on June 12, 2007. They were maintained at the laboratory at a temperature of 2°C to 6°C except as 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

Halogenated Volatiles EPA 8260B Analysis

Per EPA Method 5035A, samples were received by the laboratory in pre-weighed 40 mL VOA vials within 48 hours of sample collection. They were stored in a freezer at between -7°C and -20°C until extraction or analysis.

Any other QA/QC issues associated with this extraction and analysis will be indicated with a footnote reference and discussed in detail on the Data Qualifier page.

HALOGENATED VOLATILES by EPA 8260B page 1 of 2

Date Extracted:	6-13-07
Date Analyzed:	6-13-07
Matrix: Units:	Soil mg/kg (ppm)
Lab ID:	06-103-01

Client ID: FB3-1

Compound	Results	Flags	PQL
Dichlorodifluoromethane	ND		0.00091
Chloromethane	ND		0.00091
Vinyl Chloride	ND		0.00091
Bromomethane	ND		0.0045
Chloroethane	ND		0.00091
Trichlorofluoromethane	ND		0.00091
1,1-Dichloroethene	ND		0.00091
lodomethane	ND		0.0045
Methylene Chloride	0 0 1 0	н	0.0091
(trans) 1,2-Dichloroethene	ND		0.00091
1,1-Dichloroethane	ND		0.00091
2,2-Dichloropropane	ND		0.00091
(cis) 1,2-Dichloroethene	ND		0.00091
Bromochloromethane	ND		0.00091
Chloroform	ND		0.00091
1,1,1-Trichloroethane	ND		0.00091
Carbon Tetrachloride	ND		0.00091
1,1-Dichloropropene	ND		0.00091
1,2-Dichloroethane	ND		0.00091
Trichloroethene	ND		0.00091
1,2-Dichloropropane	ND		0.00091
Dibromomethane	ND		0.00091
Bromodichloromethane	ND		0.00091
2-Chloroethyl Vinyl Ether	ND		0.0045
(cis) 1,3-Dichloropropene	ND		0.00091
(trans) 1,3-Dichloropropene	ND		0.00091

HALOGENATED VOLATILES by EPA 8260B page 2 of 2

Lab ID:	06-103-01			
Client ID:	FB3-1			
Compound		Results	Flags	PQL
1,1,2-Trichloroethane		ND		0.00091
Tetrachloroethene		0.0020		0.00091
1,3-Dichloropropane		ND		0.00091
Dibromochloromethane		ND		0.00091
1,2-Dibromoethane		ND		0.00091
Chlorobenzene		ND		0.00091
1,1,1,2-Tetrachloroethane		ND		0.00091
Bromoform		ND		0.00091
Bromobenzene		ND		0.00091
1,1,2,2-Tetrachloroethane		ND		0.00091
1,2,3-Trichloropropane		ND		0.00091
2-Chlorotoluene		ND		0 00091
4-Chiorotoluene		ND		0.00091
1,3-Dichlorobenzene		ND		0.00091
1,4-Dichlorobenzene		ND		0.00091
1,2-Dichlorobenzene		ND		0.00091
1,2-Dibromo-3-chloropropan	e	ND		0.0045
1,2,4-Trichlorobenzene		ND		0.00091
Hexachlorobutadiene		ND		0.0045
1,2,3-Trichlorobenzene		ND		0.00091

	Percent	Control
Surrogate	Recovery	Limits
Dibromofluoromethane	83	70-118
Toluene, d8	86	70-121
4-Bromofluorobenzene	94	70-130

HALOGENATED VOLATILES by EPA 8260B page 1 of 2

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Date Extracted:	6-14-07
Date Analyzed:	6-14-07
Matrix:	Soil
Units:	mg/kg (ppm)
Lab ID:	06-103-02
Client ID:	FB3-6

Compound	Results	Flags	PQL
Dichlorodifluoromethane	ND		0.0014
Chloromethane	ND		0.0014
Vinyl Chloride	ND		0.0014
Bromomethane	ND		0.0069
Chloroethane	ND		0.0014
Trichlorofluoromethane	ND		0.0014
1,1-Dichloroethene	ND		0.0014
lodomethane	ND		0.0069
Methylene Chloride	0.015	н	0.014
(trans) 1,2-Dichloroethene	0.0028		0.0014
1,1-Dichloroethane	ND		0.0014
2,2-Dichloropropane	ND		0.0014
(cis) 1,2-Dichloroethene	0.043		0.0014
Bromochloromethane	ND		0.0014
Chloroform	ND		0.0014
1,1,1-Trichloroethane	ND		0.0014
Carbon Tetrachloride	ND		0.0014
1,1-Dichloropropene	ND		0.0014
1,2-Dichloroethane	ND		0.0014
Trichloroethene	ND		0.0014
1,2-Dichloropropane	ND		0.0014
Dibromomethane	ND		0.0014
Bromodichloromethane	ND		0.0014
2-Chloroethyl Vinyl Ether	ND		0.0069
(cis) 1,3-Dichloropropene	ND		0.0014
(trans) 1,3-Dichloropropene	ND		0.0014

HALOGENATED VOLATILES by EPA 8260B page 2 of 2

Lab ID:	06-103-02			
Client ID:	FB3-6			
Compound		Reculte	Flags	POI
1 1 2-Trichloroethane		ND	Tiags	
Tetrachloroetheno		0.0054		0.0014
		0.0034 ND		0.0014
1,3-Dicitior opropane		ND		0.0014
1.2 Diberranthana		ND		0.0014
		ND		0.0014
Chlorobenzene		ND		0.0014
1,1,1,2-I etrachloroethane		ND		0.0014
Bromoform		ND		0 00 14
Bromobenzene		ND		0.0014
1,1,2,2-Tetrachloroethane		ND		0.0014
1,2,3-Trichloropropane		ND		0.0014
2-Chlorotoluene		ND		0.0014
4-Chlorotoluene		ND		0.0014
1,3-Dichlorobenzene		ND		0.0014
1,4-Dichlorobenzene		ND		0.0014
1,2-Dichlorobenzene		ND		0.0014
1,2-Dibromo-3-chloropropane	ł	ND		0.0069
1,2,4-Trichlorobenzene		ND		0.0014
Hexachlorobutadiene		ND		0.0069
1,2,3-Trichlorobenzene		ND		0.0014

	Percent	Control
Surrogate	Recovery	Limits
Dibromofluoromethane	88	70-118
Toluene, d8	77	70-121
4-Bromofluorobenzene	82	70-130

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HALOGENATED VOLATILES by EPA 8260B

page 1 of 2

Compound	Results	Flags	PQL
Dichlorodifluoromethane	ND		0.0010
Chloromethane	ND		0.0010
Vinyl Chloride	ND		0.0010
Bromomethane	ND		0.0052
Chloroethane	ND		0.0010
Trichlorofluoromethane	ND		0.0010
1,1-Dichloroethene	ND		0.0010
lodomethane	ND		0.0052
Methylene Chloride	ND		0.010
(trans) 1,2-Dichloroethene	ND		0.0010
1,1-Dichloroethane	ND		0.0010
2,2-Dichloropropane	ND		0.0010
(cis) 1,2-Dichloroethene	0.0017		0.0010
Bromochloromethane	ND		0.0010
Chloroform	ND		0.0010
1,1,1-Trichloroethane	ND		0.0010
Carbon Tetrachloride	ND		0.0010
1,1-Dichloropropene	ND		0.0010
1,2-Dichloroethane	ND		0.0010
Trichloroethene	ND		0.0010
1,2-Dichloropropane	ND		0.0010
Dibromomethane	ND		0.0010
Bromodichloromethane	ND		0.0010
2-Chloroethyl Vinyl Ether	ND		0.0052
(cis) 1,3-Dichloropropene	ND		0.0010
(trans) 1,3-Dichloropropene	ND		0.0010

HALOGENATED VOLATILES by EPA 8260B page 2 of 2

Lab ID:	06-103-03			
Client ID:	FB3-9			
0		D H.	F 1	501
Compound		Results	Flags	PQL
1,1,2-Trichloroethane		ND		0.0010
Tetrachloroethene		0.020		0.0010
1,3-Dichloropropane		ND		0.0010
Dibromochloromethane		ND		0.0010
1,2-Dibromoethane		ND		0.0010
Chlorobenzene		ND		0.0010
1,1,1,2-Tetrachloroethane		ND		0.0010
Bromoform		ND		0.0010
Bromobenzene		ND		0.0010
1,1,2,2-Tetrachloroethane		ND		0.0010
1,2,3-Trichloropropane		ND		0.0010
2-Chlorotoluene		ND		0.0010
4-Chlorotoluene		ND		0.0010
1,3-Dichlorobenzene		ND		0.0010
1,4-Dichlorobenzene		ND		0.0010
1,2-Dichlorobenzene		ND		0.0010
1,2-Dibromo-3-chloropropane	9	ND		0.0052
1,2,4-Trichlorobenzene		ND		0.0010
Hexachlorobutadiene		ND		0.0052
1,2,3-Trichlorobenzene		ND		0.0010

	Percent	Control
Surrogate	Recovery	Limits
Dibromofluoromethane	87	70-118
Toluene, d8	80	70-121
4-Bromofluorobenzene	87	70-130

HALOGENATED VOLATILES by EPA 8260B

page 1 of 2

Date Extracted:	6-13-07		
Date Analyzed:	6-13-07		
Matrix:	Soil		
Units:	mg/kg (ppm)		
Lab ID:	06-103-04		
Client ID:	FB4-0.5		

Compound	Results	Flags	PQL
Dichlorodifluoromethane	ND		0.0010
Chloromethane	ND		0.0010
Vinyl Chloride	ND		0.0010
Bromomethane	ND		0.0051
Chloroethane	ND		0.0010
Trichlorofluoromethane	ND		0.0010
1,1-Dichloroethene	ND		0.0010
lodomethane	ND		0.0051
Methylene Chloride	0.038	Н	0.010
(trans) 1,2-Dichloroethene	ND		0.0010
1,1-Dichloroethane	ND		0.0010
2,2-Dichloropropane	ND		0.0010
(cis) 1,2-Dichloroethene	ND		0.0010
Bromochloromethane	ND		0.0010
Chloroform	ND		0.0010
1,1,1-Trichloroethane	ND		0.0010
Carbon Tetrachloride	ND		0.0010
1,1-Dichloropropene	ND		0.0010
1,2-Dichloroethane	ND		0.0010
Trichloroethene	ND		0.0010
1,2-Dichloropropane	ND		0.0010
Dibromomethane	ND		0.0010
Bromodichloromethane	ND		0.0010
2-Chloroethyl Vinyl Ether	ND		0.0051
(cis) 1,3-Dichloropropene	ND		0.0010
(trans) 1,3-Dichloropropene	ND		0.0010

HALOGENATED VOLATILES by EPA 8260B page 2 of 2

Lab ID:	06-103-04			
Client ID:	FB4-0.5			
Compound		Results	Flags	PQL
1,1,2-Trichloroethane		ND		0.0010
Tetrachloroethene		0.0041		0.0010
1,3-Dichloropropane		ND		0.0010
Dibromochloromethane		ND		0.0010
1,2-Dibromoethane		ND		0.0010
Chlorobenzene		ND		0.0010
1,1,1,2-Tetrachloroethane		ND		0.0010
Bromoform		ND		0.0010
Bromobenzene		ND		0.0010
1,1,2,2-Tetrachloroethane		ND		0.0010
1,2,3-Trichloropropane		ND		0.0010
2-Chlorotoluene		ND		0.0010
4-Chlorotoluene		ND		0.0010
1,3-Dichlorobenzene		ND		0.0010
1,4-Dichlorobenzene		ND		0.0010
1,2-Dichlorobenzene		ND		0.0010
1,2-Dibromo-3-chloropropan	e	ND		0.0051
1,2,4-Trichlorobenzene		ND		0.0010
Hexachlorobutadiene		ND		0.0051
1,2,3-Trichlorobenzene		ND		0.0010

	Percent	Control
Surrogate	Recovery	Limits
Dibromofluoromethane	84	70-118
Toluene, d8	84	70-121
4-Bromofluorobenzene	101	70-130

HALOGENATED VOLATILES by EPA 8260B page 1 of 2

Date Extracted:	6-13-07
Date Analyzed:	6-13-07
Matrix:	Soil
Units:	mg/kg (ppm)
Lab ID:	06-103-05
Client ID:	FB4-5

Compound	Results	Flags	PQL
Dichlorodifluoromethane	ND		0.00096
Chloromethane	ND		0.00096
Vinyl Chloride	ND		0.00096
Bromomethane	ND		0.0048
Chloroethane	ND		0.00096
Trichlorofluoromethane	ND		0.00096
1,1-Dichloroethene	ND		0.00096
Iodomethane	ND		0.0048
Methylene Chloride	0.011	н	0.0096
(trans) 1,2-Dichloroethene	ND		0.00096
1,1-Dichloroethane	ND		0.00096
2,2-Dichloropropane	ND		0 00096
(cis) 1,2-Dichloroethene	ND		0 00096
Bromochloromethane	ND		0.00096
Chloroform	ND		0.00096
1,1,1-Trichloroethane	ND		0.00096
Carbon Tetrachloride	ND		0.00096
1,1-Dichloropropene	ND		0.00096
1,2-Dichloroethane	ND		0.00096
Trichloroethene	ND		0.00096
1,2-Dichloropropane	ND		0.00096
Dibromomethane	ND		0.00096
Bromodichloromethane	ND		0.00096
2-Chloroethyl Vinyl Ether	ND		0.0048
(cis) 1,3-Dichloropropene	ND		0.00096
(trans) 1,3-Dichloropropene	ND		0.00096

HALOGENATED VOLATILES by EPA 8260B page 2 of 2

Lab ID:	06-103-05
Client ID:	FB4-5

Compound	Results	Flags	PQL
1,1,2-Trichloroethane	ND		0.00096
Tetrachloroethene	0.0061		0.00096
1,3-Dichloropropane	ND		0.00096
Dibromochloromethane	ND		0.00096
1,2-Dibromoethane	ND		0.00096
Chlorobenzene	ND		0.00096
1,1,1,2-Tetrachloroethane	ND		0.00096
Bromoform	ND		0.00096
Bromobenzene	ND		0.00096
1,1,2,2-Tetrachloroethane	ND		0.00096
1,2,3-Trichloropropane	ND		0.00096
2-Chlorotoluene	ND		0.00096
4-Chlorotoluene	ND		0.00096
1,3-Dichlorobenzene	ND		0.00096
1,4-Dichlorobenzene	ND		0.00096
1,2-Dichlorobenzene	ND		0.00096
1,2-Dibromo-3-chloropropane	ND		0.0048
1,2,4-Trichlorobenzene	ND		0.00096
Hexachlorobutadiene	ND		0.0048
1,2,3-Trichlorobenzene	ND		0.00096

	Percent	Control
Surrogate	Recovery	Limits
Dibromofluoromethane	85	70-118
Toiuene, d8	88	70-121
4-Bromofluorobenzene	91	70-130

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HALOGENATED VOLATILES by EPA 8260B page 1 of 2

Date Extracted:	6-14-07
Date Analyzed:	6-14-07
Matrix:	Soil
Units:	mg/kg (ppm)
Lab ID:	06-103-06
Client ID:	FB4-9

Compound	Results	Flags	PQL
Dichlorodifluoromethane	ND		0.0013
Chloromethane	ND		0.0013
Vinyl Chloride	ND		0.0013
Bromomethane	ND		0.0067
Chloroethane	ND		0.0013
Trichlorofluoromethane	ND		0.0013
1,1-Dichloroethene	ND		0.0013
lodomethane	ND		0.0067
Methylene Chloride	0.039	н	0.013
(trans) 1,2-Dichloroethene	ND		0.0013
1,1-Dichloroethane	ND		0.0013
2,2-Dichloropropane	ND		0.0013
(cis) 1,2-Dichloroethene	ND		0.0013
Bromochloromethane	ND		0.0013
Chloroform	ND		0.0013
1,1,1-Trichloroethane	ND		0.0013
Carbon Tetrachloride	ND		0.0013
1,1-Dichloropropene	ND		0.0013
1,2-Dichloroethane	ND		0.0013
Trichloroethene	ND		0.0013
1,2-Dichloropropane	ND		0.0013
Dibromomethane	ND		0.0013
Bromodichloromethane	ND		0.0013
2-Chloroethyl Vinyl Ether	ND		0.0067
(cis) 1,3-Dichloropropene	ND		0.0013
(trans) 1,3-Dichloropropene	ND		0.0013

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HALOGENATED VOLATILES by EPA 8260B page 2 of 2

Lab ID: Client ID:	06-103-06 F B4-9			
Compound		Results	Flags	PQL
1,1,2-Trichloroethane		ND		0.0013
Tetrachloroethene		0.0026		0.0013
1,3-Dichloropropane		ND		0.0013
Dibromochloromethane		ND		0.0013
1,2-Dibromoethane		ND		0.0013
Chlorobenzene		ND		0.0013
1,1,1,2-Tetrachloroethane		ND		0.0013
Bromoform		ND		0.0013
Bromobenzene		ND		0.0013
1,1,2,2-Tetrachloroethane		ND		0.0013
1,2,3-Trichloropropane		ND		0.0013
2-Chlorotoluene		ND		0.0013
4-Chlorotoluene		ND		0.0013
1,3-Dichlorobenzene		ND		0.0013
1,4-Dichlorobenzene		ND		0.0013
1,2-Dichlorobenzene		ND		0.0013
1,2-Dibromo-3-chloropropane	•	ND		0.0067
1,2,4-Trichlorobenzene		ND		0.0013
Hexachlorobutadiene		ND		0.0067
1,2,3-Trichlorobenzene		ND		0.0013

	Percent	Control
Surrogate	Recovery	Limits
Dibromofluoromethane	84	70-118
Toluene, d8	87	70-121
4-Bromofluorobenzene	96	70-130

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HALOGENATED VOLATILES by EPA 8260B page 1 of 2

Date Extracted:	6-13-07
Date Analyzed:	6-13-07
Matrix:	Soil
Units:	mg/kg (ppm)
Lab ID:	06-103-07
Client ID:	FB5-0.5

FB5-0.5

Compound	Results	Flags	PQL
Dichlorodifluoromethane	ND		0.00099
Chloromethane	ND		0.00099
Vinyl Chloride	ND		0.00099
Bromomethane	ND		0.0050
Chloroethane	ND		0.00099
Trichlorofluoromethane	ND		0.00099
1,1-Dichloroethene	ND		0.00099
lodomethane	ND		0.0050
Methylene Chloride	0.014	Н	0.0099
(trans) 1,2-Dichloroethene	ND		0.00099
1,1-Dichloroethane	ND		0.00099
2,2-Dichloropropane	ND		0.00099
(cis) 1,2-Dichloroethene	ND		0.00099
Bromochloromethane	ND		0.00099
Chloroform	ND		0.00099
1,1,1-Trichloroethane	ND		0.00099
Carbon Tetrachloride	ND		0.00099
1,1-Dichloropropene	ND		0.00099
1,2-Dichloroethane	ND		0.00099
Trichloroethene	ND		0.00099
1,2-Dichloropropane	ND		0.00099
Dibromomethane	ND		0.00099
Bromodichloromethane	ND		0.00099
2-Chloroethyl Vinyl Ether	ND		0.0050
(cis) 1,3-Dichloropropene	ND		0.00099
(trans) 1,3-Dichloropropene	ND		0.00099

HALOGENATED VOLATILES by EPA 8260B page 2 of 2

Lab ID: Client ID:	06-103-07 FB5-0.5			
Compound		Results	Flags	PQL
1,1,2-Trichloroethane		ND		0.00099
Tetrachloroethene		ND		0.00099
1,3-Dichloropropane		ND		0.00099
Dibromochloromethane		ND		0.00099
1,2-Dibromoethane		ND		0.00099
Chlorobenzene		ND		0.00099
1,1,1,2-Tetrachloroethane		ND		0 00099
Bromoform		ND		0.00099
Bromobenzene		ND		0.00099
1,1,2,2-Tetrachloroethane		ND		0.00099
1,2,3-Trichloropropane		ND		0.00099
2-Chlorotoluene		ND		0.00099
4-Chlorotoluene		ND		0.00099
1,3-Dichlorobenzene		ND		0.00099
1,4-Dichlorobenzene		ND		0.00099
1,2-Dichlorobenzene		ND		0.00099
1,2-Dibromo-3-chloropropane	e	ND		0.0050
1,2,4-Trichlorobenzene		ND		0.00099
Hexachlorobutadiene		ND		0.0050
1,2,3-Trichlorobenzene		ND		0.00099

	Percent	Control
Surrogate	Recovery	Limits
Dibromofluoromethane	83	70-118
Toluene, d8	80	70-121
4-Bromofluorobenzene	86	70-130

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HALOGENATED VOLATILES by EPA 8260B page 1 of 2

Date Extracted:	6-13-07		
Date Analyzed:	6-13-07		
Matrix:	Soil		
Units:	mg/kg (ppm)		
Lab ID:	06-103-08		

Client ID: FB5-3

Compound	Results	Flags	PQL
Dichlorodifluoromethane	ND		0.00081
Chloromethane	ND		0.00081
Vinyl Chloride	ND		0.00081
Bromomethane	ND		0.0040
Chloroethane	ND		0.00081
Trichlorofluoromethane	ND		0.00081
1,1-Dichloroethene	ND		0.00081
lodomethane	ND		0.0040
Methylene Chloride	0.010	н	0.0081
(trans) 1,2-Dichloroethene	ND		0.00081
1,1-Dichloroethane	ND		0.00081
2,2-Dichloropropane	ND		0.00081
(cis) 1,2-Dichloroethene	ND		0.00081
Bromochloromethane	ND		0.00081
Chloroform	ND		0.00081
1,1,1-Trichloroethane	ND		0.00081
Carbon Tetrachloride	ND		0.00081
1,1-Dichloropropene	ND		0.00081
1,2-Dichloroethane	ND		0.00081
Trichloroethene	ND		0.00081
1,2-Dichloropropane	ND		0.00081
Dibromomethane	ND		0.00081
Bromodichloromethane	ND		0.00081
2-Chloroethyl Vinyl Ether	ND		0.0040
(cis) 1,3-Dichloropropene	ND		0.00081
(trans) 1,3-Dichloropropene	ND		0.00081

HALOGENATED VOLATILES by EPA 8260B page 2 of 2

Lab ID:	06-103-08
Client ID:	FB5-3
Compound	

Compound	Results	Flags	PQL
1,1,2-Trichloroethane	ND		0.00081
Tetrachloroethene	0 021		0.00081
1,3-Dichloropropane	ND		0.00081
Dibromochloromethane	ND		0.00081
1,2-Dibromoethane	ND		0 00081
Chlorobenzene	ND		0.00081
1,1,1,2-Tetrachloroethane	ND		0.00081
Bromoform	ND		0.00081
Bromobenzene	ND		0.00081
1,1,2,2-Tetrachloroethane	ND		0.00081
1,2,3-Trichloropropane	ND		0.00081
2-Chlorotoluene	ND		0.00081
4-Chlorotoluene	ND		0.00081
1,3-Dichlorobenzene	ND		0.00081
1,4-Dichlorobenzene	ND		0.00081
1,2-Dichlorobenzene	ND		0.00081
1,2-Dibromo-3-chloropropane	ND		0.0040
1,2,4-Trichlorobenzene	ND		0.00081
Hexachlorobutadiene	ND		0.0040
1,2,3-Trichlorobenzene	ND		0 00081

	Percent	Control
Surrogate	Recovery	Limits
Dibromofluoromethane	83	70-118
Toluene, d8	74	70-121
4-Bromofluorobenzene	79	70-130

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HALOGENATED VOLATILES by EPA 8260B page 1 of 2

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Date Extracted:	6-14-07
Date Analyzed:	6-14-07
Matrix:	Soil
Units:	mg/kg (ppm)
Lab ID:	06-103-09
Client ID:	FB5-5

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Compound	Results	Flags	PQL
Dichlorodifluoromethane	ND		0.00094
Chloromethane	ND		0.00094
Vinyl Chloride	ND		0.00094
Bromomethane	ND		0.0047
Chloroethane	ND		0.00094
Trichlorofluoromethane	ND		0.00094
1,1-Dichloroethene	ND		0.00094
lodomethane	ND		0.0047
Methylene Chloride	0.012	Н	0.0094
(trans) 1,2-Dichloroethene	ND		0.00094
1,1-Dichloroethane	ND		0.00094
2,2-Dichloropropane	ND		0.00094
(cis) 1,2-Dichloroethene	ND		0.00094
Bromochloromethane	ND		0.00094
Chloroform	ND		0.00094
1,1,1-Trichloroethane	ND		0.00094
Carbon Tetrachloride	ND		0.00094
1, 1-Dichloropropene	ND		0 00094
1,2-Dichloroethane	ND		0.00094
Trichloroethene	ND		0.00094
1,2-Dichloropropane	ND		0.00094
Dibromomethane	ND		0.00094
Bromodichloromethane	ND		0.00094
2-Chloroethyl Vinyl Ether	ND		0.0047
(cis) 1,3-Dichloropropene	ND		0.00094
(trans) 1,3-Dichloropropene	ND		0.00094

HALOGENATED VOLATILES by EPA 8260B page 2 of 2

Lab ID: Client ID:	06-103-09 FB5-5			
Compound		Results	Flags	PQL
1,1,2-Trichloroethane		ND		0.00094
Tetrachloroethene		0.018		0.00094
1,3-Dichloropropane		ND		0.00094
Dibromochloromethane		ND		0.00094
1,2-Dibromoethane		ND		0.00094
Chlorobenzene		ND		0.00094
1,1,1,2-Tetrachloroethane		ND		0.00094
Bromoform		ND		0.00094
Bromobenzene		ND		0.00094
1,1,2,2-Tetrachloroethane		ND		0.00094
1,2,3-Trichloropropane		ND		0.00094
2-Chlorotoluene		ND		0.00094
4-Chlorotoluene		ND		0.00094
1,3-Dichlorobenzene		ND		0.00094
1,4-Dichlorobenzene		ND		0.00094
1,2-Dichlorobenzene		ND		0.00094
1,2-Dibromo-3-chloropropane)	ND		0.0047
1,2,4-Trichlorobenzene		ND		0.00094
Hexachlorobutadiene		ND		0.0047
1,2,3-Trichlorobenzene		ND		0.00094

	Percent	Control
Surrogate	Recovery	Limits
Dibromofluoromethane	90	70-118
Toluene, d8	80	70-121
4-Bromofluorobenzene	90	70-130

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HALOGENATED VOLATILES by EPA 8260B METHOD BLANK QUALITY CONTROL page 1 of 2

Date Extracted:	6-13-07
Date Analyzed:	6-13-07
•	
Matrix:	Soil
Units:	mg/kg (ppm)

Lab ID: MB0613S1

Compound	Results	Flags	PQL
Dichlorodifluoromethane	ND		0.0010
Chloromethane	ND		0.0010
Vinyl Chloride	ND		0.0010
Bromomethane	ND		0.0050
Chloroethane	ND		0.0010
Trichlorofluoromethane	ND		0.0010
1,1-Dichloroethene	ND		0.0010
lodomethane	ND		0.0050
Methylene Chloride	ND		0.010
(trans) 1,2-Dichloroethene	ND		0.0010
1,1-Dichloroethane	ND		0.0010
2,2-Dichloropropane	ND		0.0010
(cis) 1,2-Dichloroethene	ND		0.0010
Bromochloromethane	ND		0.0010
Chloroform	ND		0.0010
1,1,1-Trichloroethane	ND		0.0010
Carbon Tetrachloride	ND		0.0010
1,1-Dichloropropene	ND		0.0010
1,2-Dichloroethane	ND		0.0010
Trichloroethene	ND		0.0010
1,2-Dichloropropane	ND		0.0010
Dibromomethane	ND		0.0010
Bromodichloromethane	ND		0.0010
2-Chloroethyl Vinyl Ether	ND		0.0050
(cis) 1,3-Dichloropropene	ND		0.0010
(trans) 1,3-Dichloropropene	ND		0.0010

HALOGENATED VOLATILES by EPA 8260B METHOD BLANK QUALITY CONTROL. page 2 of 2

Lab ID:

MB0613S1

Compound	Results	Flags	PQL
1,1,2-Trichloroethane	ND		0.0010
Tetrachloroethene	ND		0.0010
1,3-Dichloropropane	ND		0.0010
Dibromochloromethane	ND		0.0010
1,2-Dibromoethane	ND		0.0010
Chiorobenzene	ND		0.0010
1,1,1,2-Tetrachloroethane	ND		0.0010
Bromoform	ND		0.0010
Bromobenzene	ND		0.0010
1,1,2,2-Tetrachloroethane	ND		0.0010
1,2,3-Trichloropropane	ND		0.0010
2-Chlorotoluene	ND		0.0010
4-Chlorotoluene	ND		0.0010
1,3-Dichlorobenzene	ND		0.0010
1,4-Dichlorobenzene	ND		0.0010
1,2-Dichlorobenzene	ND		0.0010
1,2-Dibromo-3-chloropropane	ND		0.0050
1,2,4-Trichlorobenzene	ND		0.0010
Hexachlorobutadiene	ND		0.0050
1,2,3-Trichlorobenzene	ND		0.0010

	Percent	Control
Surrogate	Recovery	Limits
Dibromofluoromethane	83	70-118
Toluene, d8	92	70-121
4-Bromofluorobenzene	96	70-130

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HALOGENATED VOLATILES by EPA 8260B METHOD BLANK QUALITY CONTROL page 1 of 2

Date Extracted:	6-14-07
Date Analyzed:	6-14-07

Matrix:	Soil
Units:	mg/kg (ppm)

Lab ID:

MB0614S1

Compound	Results	Flags	PQL
Dichlorodifluoromethane	ND		0.0010
Chloromethane	ND		0.0010
Vinyl Chloride	ND		0.0010
Bromomethane	ND		0.0050
Chloroethane	ND		0.0010
Trichlorofluoromethane	ND		0.0010
1,1-Dichloroethene	ND		0.0010
lodomethane	ND		0.0050
Methylene Chloride	ND		0.010
(trans) 1,2-Dichloroethene	ND		0.0010
1,1-Dichloroethane	ND		0.0010
2,2-Dichloropropane	ND		0.0010
(cis) 1,2-Dichloroethene	ND		0.0010
Bromochloromethane	ND		0.0010
Chloroform	ND		0.0010
1,1,1-Trichloroethane	ND		0.0010
Carbon Tetrachloride	ND		0.0010
1,1-Dichloropropene	ND		0.0010
1,2-Dichloroethane	ND		0.0010
Trichloroethene	ND		0.0010
1,2-Dichloropropane	ND		0.0010
Dibromomethane	ND		0.0010
Bromodichloromethane	ND		0.0010
2-Chloroethyl Vinyl Ether	ND		0.0050
(cis) 1,3-Dichloropropene	ND		0.0010
(trans) 1,3-Dichloropropene	ND		0.0010

HALOGENATED VOLATILES by EPA 8260B METHOD BLANK QUALITY CONTROL page 2 of 2

Lab ID:

MB0614S1

Compound	Results	Flags	PQL
1,1,2-Trichloroethane	ND		0.0010
Tetrachloroethene	ND		0.0010
1,3-Dichloropropane	ND		0.0010
Dibromochloromethane	ND		0.0010
1,2-Dibromoethane	ND		0.0010
Chlorobenzene	ND		0.0010
1,1,1,2-Tetrachloroethane	ND		0.0010
Bromoform	ND		0.0010
Bromobenzene	ND		0.0010
1,1,2,2-Tetrachloroethane	ND		0.0010
1,2,3-Trichloropropane	ND		0.0010
2-Chlorotoluene	ND		0.0010
4-Chlorotoluene	ND		0.0010
1,3-Dichlorobenzene	ND		0.0010
1,4-Dichlorobenzene	ND		0.0010
1,2-Dichlorobenzene	ND		0.0010
1,2-Dibromo-3-chloropropane	ND		0.0050
1,2,4-Trichlorobenzene	ND		0.0010
Hexachlorobutadiene	ND		0.0050
1,2,3-Trichlorobenzene	ND		0.0010

	Percent	Control					
Surrogate	Recovery	Limits					
Dibromofluoromethane	85	70-118					
Toluene, d8	78	70-121					
4-Bromofluorobenzene	91	70-130					

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

HALOGENATED VOLATILES by EPA 8260B SB/SBD QUALITY CONTROL

Date Extracted:	6-13-07
Date Analyzed:	6-13-07

Matrix:	Soil
Units:	mg/kg (ppm)

Lab ID: SB0613S1

Compound	Spike Amount	SB	Percent Recovery	SBD	Percent Recovery	Recovery Limits	Flags
1,1-Dichloroethene	0.0500	0.0506	101	0.0513	103	70-130	
Benzene	0.0500	0.0490	98	0.0480	96	70-127	
Trichloroethene	0.0500	0.0486	97	0.0487	97	73-117	
Toluene	0.0500	0.0455	91	0.0464	93	78-115	
Chlorobenzene	0.0500	0.0511	102	0.0505	101	80-117	

		RPD	
	RPD	Limit	Flags
1,1-Dichloroethene	2	10	
Benzene	2	11	
Trichloroethene	0	13	
Toluene	2	12	
Chlorobenzene	1	10	

HALOGENATED VOLATILES by EPA 8260B SB/SBD QUALITY CONTROL

Date Extracted:	6-14-07
Date Analyzed:	6-14-07

Matrix:	Soil
Units:	mg/kg (ppm)

Lab ID: SB0614S1

Compound	Spike Amount	SB	Percent Recovery	SBD	Percent Recovery	Recovery Limits	Flags
1,1-Dichloroethene	0.0500	0.0528	106	0.0538	108	70-130	
Benzene	0.0500	0.0484	97	0.0470	94	70-127	
Trichloroethene	0.0500	0.0488	98	0.0493	99	73-117	
Toluene	0.0500	0.0462	92	0.0457	91	78-115	
Chlorobenzene	0.0500	0.0489	98	0.0466	93	80-117	

		RPD	
	RPD	Limit	Flags
1,1-Dichloroethene	2	10	
Benzene	3	11	
Trichloroethene	1	13	
Toluene	1	12	
Chlorobenzene	5	10	

% MOISTURE

Date Analyzed: 6-13-07

Client ID	Lab ID	% Moisture
FB3-1	06-103-01	17
FB3-6	06-103-02	32
FB3-9	06-103-03	15
FB4-0.5	06-103-04	7
FB4-5	06-103-05	4
FB4-9	06-103-06	6
FB5-0.5	06-103-07	3
FB5-3	06-103-08	9
FB5-5	06-103-09	3

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



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.

 ${\sf H}$ - 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-napthalene) are present in the sample.

N - Hydrocarbons in the lube oil range are impacting the diesel range result.

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.

Y - Sample extract treated with an acid/silica gel cleanup procedure.

Z -

ND - Not Detected at PQL

PQL - Practical Quantitation Limit

RPD - Relative Percent Difference

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	Environmental Inc. 14848 NE 95th Street • Redmond, WA 98052 Phone: (425) 883-3891 • Fax: (425) 885-4603		Turnaroun (in worki	d Reque ng days)	st	La	bo	rato	ory	Nu	mbe	er:							0	6 -	· 1	03	}		
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14648 NE 95th Street, Redmond, WA 98052 • (425) 883-3881

June 22, 2007

Jennifer Cyr Farallon Consulting, LLC 975 5th Avenue NW Issaquah, WA 98027

Re: Analytical Data for Project 650-001 Laboratory Reference No. 0706-190

Dear Jennifer:

Enclosed are the analytical results and associated quality control data for samples submitted on June 20, 2007.

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

Case Narrative

Samples were collected on June 20, 2007 and received by the laboratory on June 20, 2007. They were maintained at the laboratory at a temperature of 2°C to 6°C except as 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.

Halogenated Volatiles EPA 8260B Analysis

Per EPA Method 5035A, samples were received by the laboratory in pre-weighed 40 mL VOA vials within 48 hours of sample collection. They were stored in a freezer at between -7°C and -20°C until extraction or analysis.

Any other QA/QC issues associated with this extraction and analysis will be indicated with a footnote reference and discussed in detail on the Data Qualifier page.

HALOGENATED VOLATILES by EPA 8260B page 1 of 2

Date Extracted:	6-20-07
Date Analyzed:	6-20-07
Matrix	Soil
Units:	ma/ka (ppm)
Lab ID:	06-190-01

Client ID: MW10-11

Compound	Results	Flags	PQL
Dichlorodifluoromethane	ND		0.00093
Chloromethane	ND		0.00093
Vinyl Chloride	ND		0.00093
Bromomethane	ND		0.0047
Chloroethane	ND		0.00093
Trichlorofluoromethane	ND		0.00093
1,1-Dichloroethene	ND		0.00093
lodomethane	ND		0.0047
Methylene Chloride	ND		0.0047
(trans) 1,2-Dichloroethene	ND		0.00093
1,1-Dichloroethane	ND		0.00093
2,2-Dichloropropane	ND		0.00093
(cis) 1,2-Dichloroethene	ND		0.00093
Bromochloromethane	ND		0.00093
Chloroform	ND		0.00093
1,1,1-Trichloroethane	ND		0.00093
Carbon Tetrachloride	ND		0.00093
1,1-Dichloropropene	ND		0.00093
1,2-Dichloroethane	ND		0.00093
Trichloroethene	ND		0.00093
1,2-Dichloropropane	ND		0.00093
Dibromomethane	ND		0.00093
Bromodichloromethane	ND		0 00093
2-Chloroethyl Vinyl Ether	ND		0.0047
(cis) 1,3-Dichloropropene	ND		0.00093
(trans) 1,3-Dichloropropene	ND		0.00093

Hexachlorobutadiene

1,2,3-Trichlorobenzene

HALOGENATED VOLATILES by EPA 8260B page 2 of 2

PQL 0.00093 0.00093 0.00093 0.00093 0.00093 0.00093 0.00093 0.00093 0.00093 0.00093 0.00093 0.00093 0.00093 0.00093 0.00093 0.00093 0.0047 0.00093 0.0047

0.00093

Lab ID: Client ID:	06-190-01 MW10-11		
Compound		Results	Flags
1.1.2-Trichloroethane		ND	0
Tetrachloroethene		ND	
1.3-Dichloropropane		ND	
Dibromochloromethane		ND	
1,2-Dibromoethane		ND	
Chlorobenzene		ND	
1, 1, 1, 2-Tetrachloroethane		ND	
Bromoform		ND	
Bromobenzene		ND	
1,1,2,2-Tetrachloroethane		ND	
1,2,3-Trichloropropane		ND	
2-Chlorotoluene		ND	
4-Chlorotoluene		ND	
1,3-Dichlorobenzene		ND	
1,4-Dichlorobenzene		ND	
1,2-Dichlorobenzene		ND	
1,2-Dibromo-3-chloropropan	e	ND	
1,2,4-Trichlorobenzene		ND	

	Porcont	Control
	Fercent	Control
Surrogate	Recovery	Limits
Dibromofluoromethane	85	70-118
Toluene, d8	80	70-121
4-Bromofluorobenzene	94	70-130

ND

ND

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HALOGENATED VOLATILES by EPA 8260B METHOD BLANK QUALITY CONTROL page 1 of 2

Date Extracted:	6-20-07
Date Analyzed:	6-20-07
	0
Moteixe	Coll

Matrix.	300
Units:	mg/kg (ppm)

Lab ID: MB0620S1

Compound	Results	Flags	PQL
Dichlorodifluoromethane	ND		0.0010
Chloromethane	ND		0.0010
Vinyl Chloride	ND		0.0010
Bromomethane	ND		0.0050
Chloroethane	ND		0.0010
Trichlorofluoromethane	ND		0.0010
1,1-Dichloroethene	ND		0.0010
lodomethane	ND		0.0050
Methylene Chloride	ND		0.0050
(trans) 1,2-Dichloroethene	ND		0.0010
1,1-Dichloroethane	ND		0.0010
2,2-Dichloropropane	ND		0.0010
(cis) 1,2-Dichloroethene	ND		0.0010
Bromochloromethane	ND		0.0010
Chloroform	ND		0.0010
1,1,1-Trichloroethane	ND		0.0010
Carbon Tetrachloride	ND		0.0010
1,1-Dichloropropene	ND		0.0010
1,2-Dichloroethane	ND		0.0010
Trichloroethene	ND		0.0010
1,2-Dichloropropane	ND		0.0010
Dibromomethane	ND		0.0010
Bromodichloromethane	ND		0.0010
2-Chloroethyl Vinyl Ether	ND		0.0050
(cis) 1,3-Dichloropropene	ND		0.0010
(trans) 1,3-Dichloropropene	ND		0.0010

HALOGENATED VOLATILES by EPA 8260B METHOD BLANK QUALITY CONTROL page 2 of 2

Lab ID:

MB0620S1

Compound	Results	Flags	PQL
1,1,2-Trichloroethane	ND		0.0010
Tetrachloroethene	ND		0.0010
1,3-Dichloropropane	ND		0.0010
Dibromochloromethane	ND		0.0010
1,2-Dibromoethane	ND		0.0010
Chlorobenzene	ND		0.0010
1,1,1,2-Tetrachloroethane	ND		0.0010
Bromoform	ND		0.0010
Bromobenzene	ND		0.0010
1,1,2,2-Tetrachloroethane	ND		0.0010
1,2,3-Trichloropropane	ND		0.0010
2-Chlorotoluene	NÐ		0.0010
4-Chlorotoluene	ND		0.0010
1,3-Dichlorobenzene	ND		0.0010
1,4-Dichlorobenzene	ND		0.0010
1,2-Dichlorobenzene	ND		0.0010
1,2-Dibromo-3-chloropropane	ND		0.0050
1,2,4-Trichlorobenzene	ND		0.0010
Hexachlorobutadiene	ND		0.0050
1,2,3-Trichlorobenzene	ND		0.0010

	Percent	Control
Surrogate	Recovery	Limits
Dibromofluoromethane	81	70-118
Toluene, d8	77	70-121
4-Bromofluorobenzene	102	70-130

HALOGENATED VOLATILES by EPA 8260B SB/SBD QUALITY CONTROL

Date Extracted:	6-20-07
Date Analyzed:	6-20-07

Matrix: Soil Units: mg/kg (ppm)

Lab ID: SB0620S1

	Spike		Percent		Percent	Recovery	
Compound	Amount	SB	Recovery	SBD	Recovery	Limits	Flags
1,1-Dichloroethene	0.0500	0.0495	99	0.0496	99	70-130	
Benzene	0.0500	0.0491	98	0.0489	98	70-127	
Trichloroethene	0.0500	0.0517	103	0.0506	101	73-117	
Toluene	0.0500	0.0494	99	0.0484	97	78-115	
Chlorobenzene	0.0500	0.0514	103	0.0485	97	80-117	

	RPD		
	RPD	Limit	Flags
1,1-Dichloroethene	0	10	
Benzene	0	11	
Trichloroethene	2	13	
Toluene	2	12	
Chlorobenzene	6	10	
% MOISTURE

Date Analyzed: 6-20-07

Client ID	Lab ID	% Moisture
		_

MW10-11

06-190-01

5

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



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-napthalene) are present in the sample.

N - Hydrocarbons in the lube oil range are impacting the diesel range result.

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.

Y - Sample extract treated with an acid/silica gel cleanup procedure

Z -

ND - Not Detected at PQL

PQL - Practical Quantitation Limit

RPD - Relative Percent Difference

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Environmental Inc. 14648 NE 95th Street • Redmond, WA 98052 Phone: (425) 883-3881 • Fax: (425) 885-4603		Turnaround (in workir	d Reques ng days)	t	La	bor	ato	ory I	Nur	nbe	er:		· · 2017				0	6	- 1	9	Ú		
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WORK ORDER #: 0706269

Work Order Summary

CLIENT:	Ms. Jennifer Cyr Farallon Consulting, LLC 975 5th Avenue NW Issaquah, WA 98027-3333	BILL TO:	Ms. Jennifer Cyr Farallon Consulting, LLC 975 5th Avenue NW Issaquah, WA 98027-3333
PHONE:	425-427-0061	P.O. #	650-001
FAX:	425-427-0067	PROJECT #	650-001 Cleaning Center of Redmond
DATE RECEIVED:	06/14/2007	CONTACT:	Sarah Nguyen
DATE COMPLETED:	06/26/2007		
			RECEIPT

FRACTION #	NAME	<u>TEST</u>	VAC./PRES.
01A	IA-1	Modified TO-15 SIM	7.0 "Hg
02A	IA-2	Modified TO-15 SIM	7 0 "Hg
02AA	IA-2 Lab Duplicate	Modified TO-15 SIM	7.0 "Hg
03A	Lab Blank	Modified TO-15 SIM	NA
04A	CCV	Modified TO-15 SIM	NA
05A	LCS	Modified TO-15 SIM	NA

Sinda d. Fruman

DATE: 06/26/07

Laboratory Director

CERTIFIED BY:

Certification numbers: CA NELAP - 02110CA, LA NELAP/LELAP- AI 30763, NJ NELAP - CA004 NY NELAP - 11291, UT NELAP - 9166389892

Name of Accrediting Agency: NELAP/Florida Department of Health, Scope of Application: Clean Air Act,

Accreditation number: E87680, Effective date: 07/01/06, Expiration date: 06/30/07

Air Toxics Ltd. certifies that the test results contained in this report meet all requirements of the NELAC standards

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Page 1 of 10



LABORATORY NARRATIVE Modified TO-15 SIM Farallon Consulting, LLC Workorder# 0706269

Two 6 Liter Summa Canister (SIM Certified) samples were received on June 14, 2007. The laboratory performed analysis via modified EPA Method TO-15 using GC/MS in the SIM acquisition mode. The method involves concentrating up to 0.5 liters of air. The concentrated aliquot is then flash vaporized and swept through a water management system to remove water vapor. Following dehumidification, the sample passes directly into the GC/MS for analysis.

This workorder was independently validated prior to submittal using 'USEPA National Functional Guidelines' as generally applied to the analysis of volatile organic compounds in air. A rules-based, logic driven, independent validation engine was employed to assess completeness, evaluate pass/fail of relevant project quality control requirements and verification of all quantified amounts.

Method modifications taken to run these samples are summarized in the below table. Specific project requirements may over-ride the ATL modifications.

Requirement	TO-15	ATL Modifications
ICAL %RSD acceptance criteria	<pre><!--=30% RSD with 2 compounds allowed out to < 40% RSD</pre--></pre>	Project specific; default criteria is =30% RSD with 10% of compounds allowed out to < 40% RSD</td
Daily Calibration	+- 30% Difference	Project specific; default criteria is = 30% Difference with 10% of compounds allowed out up to </=40%; flag and narrate outliers</td
Blank and standards	Zero air	Nitrogen
Method Detection Limit	Follow 40CFR Pt 136 App B	The MDL met all relevant requirements in Method TO-15 (statistical MDL less than the LOQ). The concentration of the spiked replicate may have exceeded 10X the calculated MDL in some cases

Receiving Notes

There were no receiving discrepancies.

Analytical Notes

There were no analytical discrepancies.

Definition of Data Qualifying Flags

Eight qualifiers may have been used on the data analysis sheets and indicates as follows:

B - Compound present in laboratory blank greater than reporting limit (background subtraction not performed).

- J Estimated value.
- E Exceeds instrument calibration range.
- S Saturated peak.
- Q Exceeds quality control limits.



- U Compound analyzed for but not detected above the reporting limit.
- UJ- Non-detected compound associated with low bias in the CCV
- N The identification is based on presumptive evidence.

File extensions may have been used on the data analysis sheets and indicates as follows:

a-File was requantified

- b-File was quantified by a second column and detector
- r1-File was requantified for the purpose of reissue



Summary of Detected Compounds MODIFIED EPA METHOD TO-15 GC/MS SIM

Client Sample ID: IA-1

Lab ID#: 0706269-01A				
Compound	Rot. Limit (ppbv)	Атount (ppbv)	Rpt. Limit (uG/m3)	Атоunt (uG/m3)
Tetrachloroethene	0 035	0.20	0.24	1.4
Client Sample ID: IA-2				
_ab ID#: 0706269-02A				
Compound	Rpt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (uG/m3)	Amount (uG/m3)
Tetrachloroethene	0.035	0.20	0.24	1.4
Client Sample ID: 1A-2 Lab Duplicate				
Lab 1D#: 0706269-02AA				

Compound	Røt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (uG/m3)	Amount (uG/m3)	
Tetrachloroethene	0.035	0 20	0.24	1.4	



Client Sample ID: IA-1

Lab ID#: 0706269-01A

MODIFIED EPA METHOD TO-15 GC/MS SIM

				·····
	v061406cim		Date of Collection:	6/12/07
	yuu 14005iiii		Date of Conection.	0,12,01
Dil. Factor:	1.75		Date of Analysis: 6	6/14/07 03:52 PM
Compound	Rot. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (uG/m3)	Amount (uG/m3)
Trichloroethene	0 035	Not Detected	0.19	Not Detected
Tetrachloroethene	0.035	0.20	0 24	1.4

Container Type: 6 Liter Summa Canister (SIM Certified)

		Method
Surrogates	%Recovery	Limits
1,2-Dichloroethane-d4	109	70-130
Toluene-d8	96	70-130
4-Bromofluorobenzene	103	70-130



Client Sample ID: IA-2 Lab ID#: 0706269-02A MODIFIED EPA METHOD TO-15 GC/MS SIM

Compound	(ppbv)	(ppbv)	(uG/m3)	(uG/m3)
Trichloroethene	0.035	Not Detected	0 19	Not Detected
Tetrachloroethene	0.035	0 20	0 24	1.4

Container Type: 6 Liter Summa Canister (SIM Certified)

	,	Method	
Surrogates	%Recovery	Limits	
1,2-Dichloroethane-d4	110	70-130	
Toluene-d8	97	70-130	
4-Bromofluorobenzene	102	70-130	



Client Sample ID: IA-2 Lab Duplicate

Lab ID#: 0706269-02AA

MODIFIED EPA METHOD TO-15 GC/MS SIM

File Name:	y061409sim		Date of Collection:	6/12/07
Dil. Factor:	1.75		Date of Analysis: 6	5/14/07 06:29 PM
Compound	Røt. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (uG/m3)	Amount (uG/m3)
Trichloroethene	0.035	Not Detected	0.19	Not Detected
Tetrachloroethene	0 035	0.20	0 24	1.4

Container Type: 6 Liter Summa Canister (SIM Certified)

	······································	Method	
Surrogates	%Recovery	Limits	
1,2-Dichloroethane-d4	108	70-130	
Toluene-d8	98	70-130	
4-Bromofluorobenzene	103	70-130	



Toluene-d8

4-Bromofluorobenzene

AN ENVIRONMENTAL ANALYTICAL LABORATORY

Client Sample ID: Lab Blank

Lab ID#: 0706269-03A

MODIFIED EPA METHOD TO-15 GC/MS SIM

7

70-130

70-130

File Name: ył Djl. Factor:	061404sim 1.00		Date of Collection: 1 Date of Analysis: 6	NA i/14/07 11:53 AM
Compound	Rot. Limit (ppbv)	Amount (ppbv)	Rpt. Limit (uG/m3)	Amount (uG/m3)
Trichloroethene	0 020	Not Detected	0.11	Not Detected
Tetrachloroethene	0.020	Not Detected	0.14	Not Detected
Container Type: NA - Not Applicable				
Surrogates		%Recovery		Method Limits
1,2-Dichloroethane-d4		110		70-130

96

93



Client Sample ID: CCV

Lab 1D#: 0706269-04A

MODIFIED EPA METHOD TO-15 GC/MS SIM

File Name: y061402sim Dil. Factor: 1.00		Date of Collection: NA Date of Analysis: 6/14/07 10:23 AM
Сотроилd		%Recovery
Trichloroethene		95
Tetrachloroethene		101
Container Type: NA - Not Applicable		
		Method
Surrogates	%Recovery	Limits
1,2-Dichloroethane-d4	101	70-130
Toluene-d8	108	70-130
4-Bromofluorobenzene	102	70-130



Client Sample 1D: LCS

Lab 1D#: 0706269-05A

MODIFIED EPA METHOD TO-15 GC/MS SIM

1

File Name: y061403sim Dat		Date of C	Pate of Collection: NA	
Dil. Factor:	1.00	Date of Analysis: 6/14/07 11:0		
Compound			%Recovery	
Trichloroethene			97	
Tetrachloroethene			104	
Container Type: NA - Not App	blicable			
			Method	
Surrogates	%	Recovery	Limits	
1,2-Dichloroethane-d4		105	70-130	
Toluene-d8		106	70-130	
4-Bromofluorobenzene		102	70-130	



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

June 29, 2007

Jennifer Cyr Farallon Consulting, LLC 975 5th Avenue NW Issaquah, WA 98027

Re: Analytical Data for Project 650-001 Laboratory Reference No. 0706-222

Dear Jennifer:

Enclosed are the analytical results and associated quality control data for samples submitted on June 22, 2007.

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

Case Narrative

Samples were collected on June 22, 2007 and received by the laboratory on June 22, 2007. They were maintained at the laboratory at a temperature of 2°C to 6°C except as 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.

HALOGENATED VOLATILES by EPA 8260B Page 1 of 2

Date Extracted:	6-22-07
Date Analyzed:	6-22-07
Matrix:	Water
Units:	ug/L (ppb)

Lab ID: 06-222-01 Client ID: MW10-GW062207

Compound	Results	Flags	PQL
Dichlorodifluoromethane	ND		0.20
Chloromethane	ND		0.20
Vinyl Chloride	ND		0.20
Bromomethane	ND		0.20
Chioroethane	ND		0.20
Trichlorofluoromethane	ND		0.20
1,1-Dichloroethene	ND		0.20
lodomethane	ND		1.0
Methylene Chloride	ND		1.0
(trans) 1,2-Dichloroethene	ND		0.20
1,1-Dichloroethane	ND		0.20
2,2-Dichloropropane	ND		0.20
(cis) 1,2-Dichloroethene	ND		0.20
Bromochloromethane	ND		0.20
Chloroform	ND		0 20
1,1,1-Trichloroethane	ND		0.20
Carbon Tetrachloride	ND		0.20
1,1-Dichloropropene	ND		0.20
1,2-Dichloroethane	ND		0.20
Trichloroethene	0.48		0.20
1,2-Dichloropropane	ND		0.20
Dibromomethane	ND		0.20
Bromodichloromethane	ND		0.20
2-Chloroethyl Vinyl Ether	ND		1.0
(cis) 1,3-Dichloropropene	ND		0.20
(trans) 1,3-Dichloropropene	ND		0.20

HALOGENATED VOLATILES by EPA 8260B Page 2 of 2

Lab ID:	06-222-01		
Client ID:	MW10-GW062207		
Compound	Results	Flags	PQL
1,1,2-Trichloroethane	ND		0.20
Tetrachloroethene	7.4		0.20
1,3-Dichloropropane	ND		0.20
Dibromochloromethane	ND		0.20
1,2-Dibromoethane	ND		0.20
Chlorobenzene	ND		0.20
1,1,1,2-Tetrachloroethane	ND		0.20
Bromoform	ND		1.0
Bromobenzene	ND		0.20
1,1,2,2-Tetrachloroethane	ND		0.20
1,2,3-Trichloropropane	ND		0.20
2-Chlorotoluene	ND		0.20
4-Chlorotoluene	ND		0.20
1,3-Dichlorobenzene	ND		0.20
1,4-Dichlorobenzene	ND		0.20
1,2-Dichlorobenzene	ND		0.20
1,2-Dibromo-3-chloropropane	e ND		1.0
1,2,4-Trichlorobenzene	ND		0.20
Hexachlorobutadiene	ND		0.20
1,2,3-Trichlorobenzene	ND		0.20

	Percent	Control
Surrogate	Recovery	Limits
Dibromofluoromethane	97	7 1-126
Toluene, d8	91	76-116
4-Bromofluorobenzene	92	70-123

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

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HALOGENATED VOLATILES by EPA 8260B METHOD BLANK QUALITY CONTROL Page 1 of 2

Date Extracted:	6-22-07
Date Analyzed:	6-22-07
Matrix:	Water
Units:	ug/L (ppb)

Lab ID: MB0622W1

Compound	Results	Flags	PQL
Dichlorodifluoromethane	ND		0.20
Chloromethane	ND		0.20
Vinyl Chloride	ND		0.20
Bromomethane	ND		0.20
Chloroethane	ND		0.20
Trichlorofluoromethane	ND		0.20
1,1-Dichloroethene	ND		0.20
Iodomethane	ND		1.0
Methylene Chloride	ND		1.0
(trans) 1,2-Dichloroethene	ND		0.20
1,1-Dichloroethane	ND		0.20
2,2-Dichloropropane	ND		0.20
(cis) 1,2-Dichloroethene	ND		0.20
Bromochloromethane	ND		0.20
Chloroform	ND		0.20
1,1,1-Trichloroethane	ND		0.20
Carbon Tetrachloride	ND		0.20
1,1-Dichloropropene	ND		0.20
1,2-Dichloroethane	ND		0,20
Trichloroethene	ND		0.20
1,2-Dichloropropane	ND		0.20
Dibromomethane	ND		0.20
Bromodichloromethane	ND		0.20
2-Chloroethyl Vinyl Ether	ND		1.0
(cis) 1,3-Dichloropropene	ND		0.20
(trans) 1,3-Dichloropropene	ND		0.20

HALOGENATED VOLATILES by EPA 8260B METHOD BLANK QUALITY CONTROL Page 2 of 2

Lab ID:

MB0622W1

Compound	Results	Flags	PQL
1,1,2-Trichloroethane	ND		0.20
Tetrachloroethene	ND		0.20
1,3-Dichloropropane	ND		0.20
Dibromochloromethane	ND		0.20
1,2-Dibromoethane	ND		0.20
Chlorobenzene	ND		0.20
1,1,1,2-Tetrachloroethane	ND		0.20
Bromoform	ND		1.0
Bromobenzene	ND		0.20
1,1,2,2-Tetrachloroethane	ND		0.20
1,2,3-Trichloropropane	ND		0.20
2-Chlorotoluene	ND		0.20
4-Chlorotoluene	ND		0.20
1,3-Dichlorobenzene	ND		0.20
1,4-Dichlorobenzene	ND		0.20
1,2-Dichlorobenzene	ND		0.20
1,2-Dibromo-3-chloropropane	ND		1.0
1,2,4-Trichlorobenzene	ND		0.20
Hexachlorobutadiene	ND		0.20
1,2,3-Trichlorobenzene	ND		0.20

	Percent	Control
Surrogate	Recovery	Limits
Dibromofluoromethane	92	71-126
Toluene, d8	93	76-116
4-Bromofluorobenzene	92	70-123

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

HALOGENATED VOLATILES by EPA 8260B SB/SBD QUALITY CONTROL

Date Extracted:	6-22-07
Date Analyzed:	6-22-07

Matrix: Water Units: ug/L (ppb)

Lab ID: SB0622W1

Compound	Spike Amount	SB	Percent Recovery	SBD	Percent Recovery	Recovery Limits	Flags
1,1-Dichloroethene	10.0	9.15	92	9.19	92	70-130	
Benzene	10.0	9.46	95	9.51	95	70-130	
Trichloroethene	10.0	8.87	89	9.02	90	70-116	
Toluene	10.0	9.75	98	9.76	98	76-119	
Chlorobenzene	10.0	9.15	92	9.22	92	77-112	

		RPD	
	RPD	Limit	Flags
1,1-Dichloroethene	0	20	
Benzene	1	16	
Trichloroethene	2	16	
Toluene	0	15	
Chlorobenzene	1	15	

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



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.

 ${\rm H}$ - 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 guantitation 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-napthalene) are present in the sample.

N - Hydrocarbons in the lube oil range are impacting the diesel range result.

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.

Y - Sample extract treated with an acid/silica get cleanup procedure.

Ζ-

ND - Not Detected at PQL PQL - Practical Quantitation Limit RPD - Relative Percent Difference

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

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APPENDIX C WASHINGTON STATE DEPARTMENT OF ECOLOGY MEMORANDUM

SITE CLOSURE REPORT ADDENDUM Former Cleaning Center of Redmond 15796 Redmond Way Redmond, Washington

Farallon PN: 650-001



Developing Conditional Points of Compliance at MTCA Sites Where Groundwater Discharges to Surface Water

Implementation Memorandum No. 16

Date:	December 2016	
To:	Interested Persons	
From:	Jeff Johnston, Manager Information & Policy Section Toxics Cleanup Program	
Contacts:	Jerome Cruz, Hydrogeologist, jerome.cruz@ecy.wa.gov, 425.649.7094 Northwest Regional Office, Toxics Cleanup Program	
	Mark Adams, Hydrogeologist, <u>mark.adams@ecy.wa.gov</u> , 425.649.7107 Northwest Regional Office, Toxics Cleanup Program	
Attachments:	None	

Accommodation Requests: To request ADA accommodation including materials in a format for the visually impaired, call Ecology's Toxics Cleanup Program at 360-407-7170. Persons with impaired hearing may call Washington Relay Service at 711. Persons with speech disability may call TTY at 877-833-6341.

Table of Contents

List of Figures and Tablesiii
Acronyms and Abbreviationsiv
1.0. Purpose and Applicability1
1.1 Terminology1
1.2 Standard and Conditional Points of Compliance Defined
2.0. When may a conditional point of compliance be set?5
2.1. On-Property Conditional Points of Compliance
2.2. Off-Property Conditional Points of Compliance5
2.2.1 Source property abuts surface water
2.2.2 Source property near, but not abutting surface water
2.2.3 Source property located in area-wide groundwater contamination8
3.0. Where should a conditional point of compliance be set?9
3.1 Location of On-Property Conditional Point of Compliance9
3.2. Location of Off-Property Conditional Point of Compliance10
3.2.1 Source property abuts surface water
3.2.2 Source property near, but not abutting surface water
3.3. Further Considerations on Setting Conditional Points of Compliance in a Groundwater Discharge Setting15
4.0. Monitoring Conditional Points of Compliance Using Upland Wells
5.0. Summary
6.0. References

List of Figures and Tables

Figure 1: Conceptual elements of the groundwater to surface water pathway at a site2
Figure 2: Schematic of a standard point of compliance4
Figure 3: Schematic of an on-property conditional point of compliance (CPOC)9
Figure 4a: Off-property conditional point of compliance (CPOC) on property abutting
surface water and where the plume has reached the surface water body11
Figure 5a (above): Off-property conditional point of compliance (CPOC) on property
near (but not abutting) surface water and where plume has reached the surface water
body14
Figure 6: Flow chart for setting points of compliance for groundwater

Table 1:	Factors	that should	be cons	sidered v	when	evaluating	practicality,	reliability,	and
protective	eness								16

Acronyms and Abbreviations

AKART	all known available and reasonable methods of treatment
CPOC	conditional point of compliance
CULs	cleanup levels
Ecology	Washington State Department of Ecology
GW	groundwater
MNA	monitored natural attenuation
MTCA	Model Toxics Control Act
NPDES	National Pollution Discharge Elimination Systems
PLP	potentially liable person
POC	point of compliance
RCW	Revised Code of Washington
SW	surface water
TCP	Toxics Cleanup Program
WAC	Washington Administrative Code

1.0. Purpose and Applicability

This memorandum provides guidance from the Washington State Department of Ecology (Ecology) for setting conditional points of compliance for groundwater at contaminated sites where a contaminant plume is discharging, or could discharge, to surface water. The memorandum describes **when** and **where** groundwater conditional points of compliance may be set, and briefly touches on **how** compliance can be measured. A point of compliance (POC) is the location where cleanup levels must be attained at a contaminated site.

The requirements for setting groundwater points of compliance are specified in WAC 173-340-720(8). Points of compliance must be identified and evaluated during the feasibility study and established in the cleanup action plan (WAC 173-340-350(8)(c)(i)(F) and 173-340-380(1)(a)(iv)).

This memorandum applies to contaminated sites cleaned up under RCW 70.105D, Model Toxics Control Act (MTCA), and its implementing regulations, WAC 173-340 (MTCA rule). It is intended for use by Ecology cleanup project managers, local governments, environmental consultants, and others who are involved in the cleanup process under MTCA.

1.1 Terminology

Typically, before groundwater discharges into surface water, it enters into a transitional zone in the aquifer where some mixing of groundwater and surface water occurs. This zone of mixed waters (located within the aquifer and sediments before groundwater enters surface water) will be referred to in this document as the **transitional zone** (see Figure 1). Note that the transitional zone also includes (or is equivalent to) the **hyporheic zone** in fluvial settings, and usually includes **sediment porewater** in saturated sediment.



Figure 1: Conceptual elements of the groundwater to surface water pathway at a site.

PHYSICAL SETTING DEFINITIONS

Transitional zone: In an aquifer, this is the area where groundwater has mixed with surface water. Beneath a stream, this area is often called the **hyporheic zone**.

Mixing zone: Outside an aquifer and within a body of surface water, this is where a plume has discharged into, and is mixing with, the water column. This term has a specific regulatory meaning described in the paragraph below this box.

Surface water/Surface water body: Any significant accumulation of water on the surface of the earth such as a stream, river, lake, reservoir, or wetland; coastal waters; or an ocean. This does not include the water in saturated sediment or native material underlying and surrounding a body of surface water.

Sediment porewater: Interstitial water in sediment. "Sediment" here refers to the definition in the Sediment Management Standards: "Surface sediments" or "sediment(s)" means, except for purposes of Part V of this chapter, settled particulate matter located in the predominant biologically active aquatic zone, or exposed to the water column. Sediment(s) also includes settled particulate matter exposed by human activity (e.g., dredging) to the biologically active aquatic zone or to the water column. (WAC 173-204-200(24))

Mixing in the transitional zone is not to be confused with mixing that occurs in the water column in a body of surface water. The latter is related to a concept established under the Water Quality Standards for Surface Waters of the State of Washington (WAC 173-201A), which is associated with permitting surface water discharge through the National Pollution Discharge Elimination System (NPDES). Under WAC 173-201A, the mixing zone refers to that portion of a surface water body adjacent to an effluent outfall where mixing results in dilution of the effluent within the receiving water. The mixing zone associated with NPDES regulations is not the topic of this memorandum.

1.2 Standard and Conditional Points of Compliance Defined

The **standard point of compliance (POC)** for groundwater under MTCA is defined as "...throughout the site from the uppermost level of the saturated zone to the lowest depth potentially affected by the site." (WAC 173-340-720(8)(b)) (see Figure 2). The definition implies that contaminated groundwater at a site will attain cleanup levels throughout the site within a reasonable restoration time frame.

For some cleanups, however, it can be demonstrated that it is not practicable to meet groundwater cleanup levels at the standard POC within a reasonable restoration time frame. In this case, Ecology may approve a **conditional POC (CPOC)**. The CPOC must not exceed the property boundary, except under the following three off-property situations:

- Source property abutting surface water;
- Source property near, but not abutting,¹ surface water; or
- Source property located in an area with "area-wide" contamination.

In this memorandum:

- Abutting is defined as a source property that borders a surface water body, with the property boundary being either at the shoreline or in the water body.
- Near, but not abutting is defined herein as a source property that is separated from a water body by one or more other properties.
- Area-wide is defined as the source property being located within a broader area affected by co-mingled plumes from multiple sources.

¹ There is no set distance by which a site may be defined as "near, but not abutting" surface water. This provision is interpreted to mean that, based on technical data specific to the site, the contaminated groundwater at the site reaches, or is likely to reach, surface water at detectable concentrations.

The following sections detail when and where conditional points of compliance can be set where groundwater and surface water interactions occur. Note that this memorandum does not address situations with area-wide contamination.



Figure 2: Schematic of a standard point of compliance.

2.0. When may a conditional point of compliance be set?

2.1. On-Property Conditional Points of Compliance

As noted in Section 1.2, when it can be demonstrated that it is not practicable to meet groundwater cleanup levels at the standard point of compliance within a reasonable restoration time frame, Ecology may approve a conditional point of compliance within or at a property boundary. The demonstration must be made in accordance with the remedy selection requirements in WAC 173-340-350 through 173-340-390 (WAC 173-340-720(8)(c)). In other words, a CPOC may be set only when the selected remedy will result in some areas of contaminated groundwater remaining at the site for a period of time considered to be longer than reasonable.

When a CPOC is proposed, the person responsible for undertaking the cleanup action must demonstrate that all practicable methods of treatment are to be used in the cleanup (WAC 173-3400720(8)(c)).

2.2. Off-Property Conditional Points of Compliance

A conditional point of compliance may be set beyond the property boundary in the following three specific situations as noted previously, subject to several conditions specified in WAC 173-340-720(8)(d).

2.2.1 Source property abuts surface water

When the groundwater cleanup level is based on protection of surface water beneficial uses, and the property containing the source of contamination abuts surface water, then Ecology may approve an off-property CPOC, subject to the following conditions (WAC 173-340-720(8)(d)(i)).

- The conditions for an on-property CPOC in WAC 173-340-720(8)(c), described in Section 2.1 above.
- 2. The following additional conditions, specified in WAC 173-340-720(8)(d)(i):
 - A. It has been demonstrated that contaminated groundwater is entering, and will continue to enter, the surface water body even after the selected remedial alternative is implemented. Note that this provision does not define "contaminated ground water" as meaning an exceedance of cleanup levels;

- B. It has been demonstrated under the remedy selection requirements in WAC 173-340-350 through 173-340-390 that it is not practicable to meet cleanup levels in groundwater before entering surface water within a reasonable restoration time frame. This means that the selected remedy will result in contaminated groundwater continuing to discharge into surface water;
- C. Use of a mixing zone under WAC 173-201A-100 to demonstrate compliance with surface water cleanup levels shall not be allowed. Although Washington State's Water Quality Standards for Surface Waters allows it for NPDES permitting (for example), MTCA does not allow using a mixing zone within the surface water body (i.e., water column) to demonstrate compliance;
- D. Groundwater discharges must be provided with "all known available and reasonable methods of treatment" (AKART) prior to release. Guidance for conducting an AKART analysis is presented in Ecology's <u>Water Quality Program</u> <u>Permit Writer's Manual</u> (Ecology 2015). Establishing AKART is generally more stringent than determining an alternative that is "permanent to the maximum extent practicable" under MTCA;
- E. Groundwater discharges must² not result in violations of sediment quality values;
- F. Groundwater and surface water monitoring must be performed to assess long-term performance of the selected cleanup action. This includes the potential for bioaccumulation problems resulting from surface water concentrations below method detection limits. As noted on page 201 of Responsiveness Summary for the Amendments to MTCA (Ecology 1991), if monitoring indicates a potential problem, the point of compliance may need to be moved back up into the groundwater system; and
- G. Before approving the CPOC, a notice of the proposal shall be mailed to the natural resource trustees, the Washington Department of Natural Resources, and the United States Corps of Engineers. The notice shall invite comments, and is in addition to notices required under WAC 173-340-600 (public involvement).

² In this section of the WAC, MTCA uses the term "shall" which is formal and is interpreted to mean the person or entity has a duty or obligation to perform a certain act. The word "must" is used here interchangeably.

These requirements, taken as a whole, set a very high bar for approving off-property CPOCs in a shoreline setting.

POLICY HIGHLIGHT

When read by themselves, the conditions for allowing a CPOC for properties abutting surface water (WAC 173-340-720(8)(d)((i)(A–G)) would appear to apply only if Ecology decides to approve a CPOC located within the surface water. However, in the section regarding *properties near*, *but not abutting*, *surface water* (WAC 173-340-720(8)(d)(ii)), the regulation requires that the conditions specified in WAC 173-340-720(8)(d)(i) must also be met.

Implicit in these two sets of nearly identical requirements is the idea that they would also apply to a third possibility for the abutting situation—a CPOC located not in surface water, but further upgradient in groundwater.

Therefore, the conditions in WAC 173-340-720(8)(d)((i)(A–G) are interpreted to be a requirement for both *abutting* and *near*, *but not abutting* properties, irrespective of where the CPOC is set.

2.2.2 Source property near, but not abutting surface water

When the groundwater cleanup level is based on protection of surface water beneficial uses and the property containing the source of contamination is located near, but not abutting surface water, then Ecology may approve an off-property CPOC, subject to all three of the following conditions (WAC 173-340-720(8)(d)(ii)).

- The conditions for an on-property CPOC in WAC 173-340-720(8)(c), described in Section 2.1 above.
- The conditions for an off-property CPOC in WAC 173-340-720(8)(d)(i), described in Section 2.2.1 above.
- 3. The following additional condition:
 - A. The affected property owners between the source of contamination and the surface water body must agree in writing to using the CPOC. Affected properties means non-PLP (potentially liable person) properties that are located between the source property and the proposed CPOC. Agreement from properties downgradient of the CPOC would not be needed, because they would not be affected.

2.2.3 Source property located in area-wide groundwater contamination

Ecology may establish an area-wide CPOC in accordance with WAC 173-340-720(8)(d)(iii). As noted previously, this memorandum does not address off-property CPOCs for area-wide situations due to the difficulty of addressing it within a groundwater to surface water discharge setting.

3.0. Where should a conditional point of compliance be set?

3.1 Location of On-Property Conditional Point of Compliance

An on-property CPOC must be set as close as practicable to the contamination source, not to exceed the property boundary (WAC 173-340-720(8)(c)). Figure 3 below illustrates two potential locations for an on-property CPOC.

POC 1 is set in "clean" water at the downgradient edge of the contaminant plume. POC 1 would be used if none of the plume is expected to attain cleanup levels in a reasonable restoration time. Having POC 1 just outside the plume provides a location where cleanup levels can be attained.

POC 2 is set within the plume. POC 2 would be used if the distal portion of the plume is expected to attain cleanup levels within a reasonable restoration time frame.



Figure 3: Schematic of an on-property conditional point of compliance (CPOC).
3.2. Location of Off-Property Conditional Point of Compliance

As discussed in Section 2.2, a CPOC may be set beyond the property boundary in three specific situations. This section discusses where to set the POC in two of those situations.

3.2.1 Source property abuts surface water

For sites where the property containing the source of contamination abuts surface water, a CPOC may be set within the surface water as close as technically possible to the point or points where groundwater flows into the surface water (WAC 173-340-720(8)(d)(i)). This means that the CPOC may be set as far into surface water as the base of the water column and directly on top of sediments, if technically possible.

However, the POC <u>must</u> be set further upgradient, within the sediment porewater or aquifer (including within the transitional zone), if conditions allow to meet the fundamental MTCA requirement that a CPOC be set as close as practicable to the source of contamination.

Figures 4a and 4b present two primary discharge scenarios. Figure 4a shows potential point of compliance locations when a contaminant plume exceeding cleanup levels is discharging into surface water. As illustrated, two potential CPOC location scenarios are presented: one in surface water (CPOC 1) and a second further upgradient (CPOC 2).

CPOC 1 is predicated on the assumption that, despite application of the selected remedy and AKART, groundwater within the existing leading edge of the plume discharging to the surface water body is not realistically expected to achieve compliance with cleanup levels in a reasonable restoration time frame. Locating this CPOC in surface water is conditioned on whether it is technically possible, and is subject to Ecology's discretion.

The second CPOC location is predicated on the assumption that groundwater at this location will meet cleanup levels within a reasonable restoration time frame. It may or may not be within the transitional zone.



Figure 4a: Off-property conditional point of compliance (CPOC) on property abutting surface water and where the plume has reached the surface water body.

Figure 4b on the next page shows a different situation where groundwater above cleanup levels is not reaching surface water. In this case, there is still the possibility of alternative CPOC locations. Two are shown in the figure. One (CPOC 1) is located within the transitional zone (not surface water) downgradient of the area that exceeds cleanup levels. The second alternative (CPOC 2) is located further upgradient, again predicated on the assumption that groundwater at this location will meet cleanup levels within a reasonable restoration time frame. It may or may not be within the transitional zone.



Figure 4b: Off-property conditional point of compliance on property abutting surface water and where plume does not reach the surface water body.

POLICY HIGHLIGHT

Cleanup project managers need to consider the following provision when deciding whether to establish a CPOC within surface water (Figure 4a). WAC 173-340-370(6) requires that:

...for facilities adjacent to a surface water body, active measures will be taken to prevent/minimize releases to surface water and ground water discharges in excess of cleanup levels. The department expects that dilution will not be the sole method for demonstrating compliance with cleanup standards in these instances. (WAC 173-340-370(6))

The goal of this provision is to encourage cutting off the source of pollution from the surface water, not to make it easier to demonstrate compliance and avoid cleanup.

3.2.2 Source property near, but not abutting surface water

There are three location requirements for this setting. The first two requirements are that 1) the CPOC must be set as close as practicable to the source, and 2) it cannot exceed the point or points where the groundwater flows into the surface water (WAC 173-340-720(8)(d)(ii)). This means that the CPOC may not be set within the surface water body. The farthest downgradient that the CPOC may be set is within the sediment porewater/groundwater within the transitional zone.

The third requirement is that if the groundwater cleanup level is not exceeded in the groundwater prior to its entry into the surface water, the CPOC cannot extend beyond the extent of groundwater contamination above cleanup levels at the time Ecology approves the CPOC (WAC 173-340-720(8)(d)(ii)). This means that the CPOC may not be set further downgradient than the tip of the plume exceeding the cleanup level at that time.

Note that unlike the abutting case, locating this CPOC is not conditioned on whether it is technically possible. Approval of the CPOC location is subject to Ecology's discretion.

Figure 5a on the following page shows a site where the contaminants exceeding cleanup levels reach surface water. The first CPOC (CPOC 1) represents the furthest point downgradient where the POC may be set. The second CPOC (CPOC 2) represents a potential location closer to the source where it is practicable to attain cleanup levels within a reasonable restoration time period.

Figure 5b illustrates a situation where the groundwater cleanup level is not exceeded in the groundwater prior to its entry into the surface water. In this case, as noted previously, the CPOC may not extend beyond the tip of the plume.



Figure 5a (above): Off-property conditional point of compliance (CPOC) on property near (but not abutting) surface water and where plume has reached the surface water body.



Figure 5b: Off-property conditional point of compliance (CPOC) on property near (but not abutting) surface water and where plume has not reached the surface water body.

POLICY HIGHLIGHT

The MTCA regulations addressing off-property CPOCs appear to focus on extreme downgradient locations. The requirements for *abutting* properties focus on a CPOC in surface water; the requirements for *near*, *but not abutting*, properties focus on a CPOC at the edge of groundwater just before it enters surface water. This focus on extremes can be misleading to cleanup project managers when they are deciding whether to allow and where to locate an off-property CPOC.

Locating any POC begins in the Feasibility Study, wherein an estimate is made of where groundwater will meet cleanup levels within a reasonable restoration time frame for each cleanup alternative being evaluated (WAC 173-340-350(8)(c)(i)(F)).

Actual selection of a CPOC location then typically occurs in the Cleanup Action Plan. Here, the process begins by confirming the area where groundwater is expected to meet cleanup levels in a reasonable restoration time frame for the selected remedy. The CPOC must then be located as far upgradient as possible to meet the MTCA requirement that a CPOC be set as close as possible to the source of the hazardous substances. In many cases this will be within a property.

If, however, the CPOC must be located off-property in a groundwater discharge setting, the requirement that it be set as close as possible to the source of hazardous substances still applies.

This means that an off-property CPOC will likely not be set at the extreme locations allowed in the MTCA regulations, but further upgradient where the groundwater will attain cleanup levels in a reasonable restoration time frame.

3.3. Further Considerations on Setting Conditional Points of Compliance in a Groundwater Discharge Setting

As previously discussed, MTCA allows off-property conditional points of compliance to be set in discharge settings under certain conditions. These settings are often high-energy environments and geochemically complex. In such situations, establishing a monitoring network that can be sampled routinely over multiple years can be challenging. Additionally, the margin for error can be very slim and the corresponding potential risk high, with compliance being potentially measured within a few inches of the receiving water body.

For these reasons, when deciding whether to approve a groundwater CPOC in a discharge setting as part of a cleanup action, the cleanup project manager should consider whether it is practical, reliable, and protective. Some of the factors that should be considered are highlighted in Table 1.

Challenge	Description				
Uncertainty about being able to physically obtain reliable data	In some situations, powerful wave or tidal activity; strong currents; or physical barriers such as riprap or bulkheads, can make it very difficult to obtain reliable data from near a shoreline.				
Uncertainty about proximity to receptors	In some situations, there may be uncertainty about the type and sensitivity of benthic organisms that are present in sediment, or the depth to which they burrow. This results in uncertainty about whether benthic species are being protected adequately and whether risk is adequately minimized.				
Uncertainty about plume discharge concentrations	Contaminant levels in a groundwater plume can vary significantly over time (contaminant mass flux). Hydrologic conditions at the point of discharge are also variable. If one or both of these situations occur, it may not be possible to establish a monitoring schedule at surface water or sediment porewater CPOCs that can be relied upon to show that discharge concentrations are being continuously protective. Areas where this might be a concern include shoreline interfaces influenced by tidal action, power dams with variable releases, or variable irrigation flows.				
Uncertainty about chemical transformations in the transition zone	Dissolved contaminants passing through the transition zone are likely to be transformed to some degree through either geochemical or biologically mediated processes, especially in tidally influenced aquifers. These processes can result in new precipitates and new daughter products. The end result may be protective or detrimental to receptors of concern.				
Complexity of monitored natural attenuation (MNA)	If MNA is the selected remedy, and if a CPOC is established in the transitional zone, it may be difficult to demonstrate that contaminant reduction is due primarily to biodegradation, given that other processes are also acting to reduce contaminant concentrations (dilution, adsorption volatilization, etc.).				

Table 1: Factors that should be considered when evaluating practicality, reliability, and protectiveness.

Cleanup project managers must be certain that a CPOC at the point of discharge is not only acceptable from a regulatory standpoint, but also functional and reliable given the specific circumstances at a particular site. Because there is always some uncertainty in knowing if future compliance can be demonstrated or achieved through a shoreline monitoring system, it is recommended that CPOCs be moved upgradient of the point of discharge/transitional zone as far as possible. If the situation is particularly problematic, the cleanup project manager should consider other ways to monitor compliance (e.g., attenuation studies, or transport and fate modeling), or to augment the remedy.

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4.0. Monitoring Conditional Points of Compliance Using Upland Wells

Compliance is typically measured by obtaining samples at the CPOC and comparing sample results to cleanup levels.

However, the MTCA rule also allows using groundwater monitoring wells upgradient of a CPOC to measure compliance in a groundwater to surface water discharge setting. Specifically, the MTCA rule states that:

...[t]he department may require or approve the use of upland monitoring wells located between the surface water and the source of contamination to establish compliance where a conditional point of compliance has been established under subsection (8)(d)(i) or (ii) of this section. (WAC 173-340-720(8)(e)).

In this situation, an estimate of natural attenuation between the upland well and the CPOC is necessary in order to demonstrate that groundwater at the POC meets cleanup levels. MTCA states this requirement as follows:

Where such monitoring wells are used, the department should consider an estimate of natural attenuation between the monitoring well and the point or points where ground water flows into the surface water in evaluating whether compliance has been achieved. (WAC 1730340-720(8)(e)(ii)).

In evaluating how much natural attenuation will occur, other factors need to be considered, including:

- Whether groundwater could reach surface water in ways that would not provide the expected natural attenuation (e.g. short-circuiting through utility trenches and seeps); and
- Whether changes in groundwater chemistry due to natural attenuation would cause an exceedance of surface water or sediment quality standards.

Because using upland wells for compliance monitoring purposes requires extrapolation, it is recommended that actual data be obtained from the point of compliance to confirm the accuracy of the natural attenuation estimate.

Washington State Department of Ecology

5.0. Summary

The following flowchart (Figure 6) summarizes and assists with setting a CPOC along the groundwater to surface water pathway.



Abbreviations: CUL = cleanup level GW = groundwater SW = surface water POC = point of compliance RTF = restoration timeframe

Figure 6: Flow chart for setting points of compliance for groundwater

6.0. References

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Model Toxics Control Act—Cleanup Regulation. WASH. ADMIN CODE § Chapter 173-340 WAC. (2013). Retrieved from: <u>http://apps.leg.wa.gov/wac/default.aspx?cite=173-340</u> and <u>https://fortress.wa.gov/ecy/publications/summarypages/9406.html</u>

Sediment Management Standards—Cleanup Regulation. WASH. ADMIN CODE § Chapter 173-204 WAC. (2013). Retrieved from: http://apps.leg.wa.gov/WAC/default.aspx?cite=173-204 and https://fortress.wa.gov/ecy/publications/SummaryPages/1309055.html

Water Quality Standards for Surface Waters of the State of Washington. WASH. ADMIN CODE § Chapter 173-201A WAC. (2011). Retrieved from: http://apps.leg.wa.gov/wac/default.aspx?cite=173-201A

APPENDIX D CONCENTRATION VS. TIME CHARTS FOR PCE IN GROUNDWATER

SITE CLOSURE REPORT ADDENDUM Former Cleaning Center of Redmond 15796 Redmond Way Redmond, Washington

Farallon PN: 650-001







ATTACHMENT B ADDITIONAL INFORMATION LETTER

REQUEST FOR SITE-WIDE NO FURTHER ACTION DETERMINATION Cleaning Center of Redmond 15796 Redmond Way Redmond, Washington

Farallon PN: 650-001



Oregon Portland | Bend | Baker City California Oakland | Folsom | Irvine

May 23, 2018

Ms. Sonia Fernández VCP Coordinator Toxics Cleanup Program Washington State Department of Ecology – Northwest Regional Office 3190 160th Avenue Southeast Bellevue, Washington 98008-5452

BY MAIL AND EMAIL

RE: RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION FORMER CLEANING CENTER OF REDMOND 15796 REDMOND WAY REDMOND, WASHINGTON FACILITY/SITE IDENTIFICATION NO. 26296554 VCP IDENTIFICATION NO. NW3166 FARALLON PN: 650-001

Dear Ms. Fernández:

Farallon Consulting, L.L.C. (Farallon) has prepared this letter to provide additional information required by the Washington State Department of Ecology (Ecology) for the Former Cleaning Center of Redmond facility located at 15796 Redmond Way in Redmond, Washington (herein referred to as the Property) (Figure 1). The Property is owned by Nelgroup Properties, L.L.C. A "site," as defined by the Washington State Model Toxics Control Act Cleanup Regulation (MTCA), as established in Chapter 173-340 of the Washington Administrative Code (WAC 173-340), consists of all areas where the constituents of concern (COCs) have come to be located at concentrations exceeding applicable cleanup levels established under MTCA. The site associated with the Former Cleaning Center of Redmond consisted of the source area proximate to the former dry cleaning facility and an area extending off the Property to the northwest, where tetrachloroethene (PCE) concentrations previously exceeded the applicable MTCA cleanup level for groundwater (herein referred to as the Site) (Figure 2).

The additional information was requested by Ecology in its letter regarding Request for Additional Information to Provide Opinion on the Investigation and Cleanup under the VCP for the following Contaminated Site: Cleaning Center of Redmond, 15796 Redmond Way, Redmond WA 98052 dated March 2, 2018, from Ms. Sonia Fernández of Ecology to Mr. Thomas L. Markl of Nelson Group Properties, L.L.C. [*sic*]¹ (Ecology Letter) as part of an initial checklist-review of the *Site Closure Report Addendum, Former Cleaning Center of Redmond, 15796 Redmond Way, Redmond Way, Redmond, Washington* dated April 26, 2017, prepared by Farallon (Site Closure Report

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¹ The letter references an incorrect company name. Mr. Markl is with Nelson Legacy Group, L.L.C., the Managing Member for the Property owner Nelgroup Properties, L.L.C., not Nelson Group Properties, L.L.C.



Addendum). The additional items requested by Ecology are paraphrased in bold font below, immediately followed by Farallon responses. Documents referenced during the preparation of this letter report are detailed in Attachment A.

ADDITIONAL INFORMATION

1. Provide soil and groundwater data from previous assessments documented in reports from 1999 and 2001.

These data were collected during previous investigations conducted by Alisto Engineering Group in January 1999 and GeoEngineers, Inc. between February and August 2000. Analytical summary tables for soil and groundwater samples, figures, and available analytical laboratory reports from Alisto Engineering Group (1999) and GeoEngineers, Inc. (2001) documents have been included in this letter as Attachments B and C, respectively.

2. No groundwater has been collected since 2007. Current groundwater data may be needed.

Sufficient groundwater monitoring data exists through 2007 for Ecology to approve the conditional point of compliance and issue a Site-wide No Further Action determination for the Site. Monitoring wells associated with the Site were decommissioned on March 30, 2012 and October 2, 2014.

3. Provide a conceptual site model and a terrestrial ecological evaluation (TEE).

The following description provides details regarding the conceptual site model for the Site, including a description of the regional and local geology and hydrogeology, a summary of the source of the COC in soil and groundwater, fate and transport of the COC, and potential exposure pathways, including the information previously submitted to Ecology that provided justification for protection of terrestrial plants and animals in the Site-specific TEE performed for the Site (Attachment D).

Geology and Hydrogeology

The Puget Sound region is underlain by Quaternary sediments deposited during glacial episodes (Galster and Laprade 1991). Deposition occurred during a number of glacial advances and retreats, which created the existing subsurface conditions. The regional sediments consist primarily of interlayered and/or sequential deposits of alluvial clays, silts, and sands that typically are situated over deposits of glacial till that consist of silty sand to sandy silt with gravel. Outwash sediments consisting of sands, silts, clays, and gravels were deposited by rivers, streams, and post-glacial lakes during the glacial retreats. With the exception of the most recent recessional deposits, the outwash sediments have been over-consolidated by the overriding ice sheets.

Shallow soil encountered during Farallon's subsurface investigation activities in the vicinity of the Site consisted primarily of sand and gravel, with the exception of soil encountered



northwest of the northern commercial building on the Property. The shallow soil at this location included a layer of silt and peat from a depth of approximately 2.5 to 8 feet below ground surface (bgs). Underlying the silt and peat was sand and gravel consistent with the other boring locations.

The shallow aquifer is unconfined and extends to a depth of at least 70 feet bgs at the Site, based on Farallon's deep boring assessment conducted in August 2006. Depth-to-groundwater measured at the Site during the last groundwater monitoring event conducted on May 15, 2007 ranged from 9.62 to 11.99 feet below the top of the well casings. During the 13 monitoring events conducted by Farallon and others from 2000 to 2007, the estimated groundwater flow direction consistently has been to the northwest toward the Sammamish River, similar to the estimated groundwater flow direction depicted on Figure 2 of the Site Closure Report Addendum and Figures 3 and 4 in Attachment C. Groundwater elevations calculated from the monitoring well gauging data indicate that the potentiometric surface of the unconfined aquifer is at a similar elevation as the surface of the Sammamish River, suggesting that they are hydrologically connected, as shown on Figure 3.

Source Area

The source area for the Site is the historical dry cleaning machine at the Former Cleaning Center of Redmond dry cleaner in the northern commercial building on the Property, as shown on attached Figure 2 from the Site Closure Report Addendum. The Former Cleaning Center of Redmond operated as a dry cleaning facility that used PCE in the dry cleaning process from 1990 to October 29, 2002. The dry cleaning machine that used PCE was replaced in 2002 with a cleaning machine that used an environmentally friendly dry cleaning chemical. The current dry cleaning facility operates as a "green" dry cleaning facility or as a dry cleaning drop-off facility.

Constituent of Concern

PCE previously was detected at concentrations exceeding the MTCA Method A cleanup levels in soil and groundwater at the Site and is the only COC for the Site, as referenced by Ecology (2011) in the No Further Action determination for the Property.

Media of Concern

Soil and groundwater were the media of concern for the Site, because the COC previously was detected in these media at concentrations exceeding MTCA Method A cleanup levels established for the Site. Concentrations of PCE were reduced to less than the MTCA Method A cleanup levels in soil and groundwater through operation of a soil vapor extraction (SVE) remediation system from 2003 to 2006; therefore, soil and groundwater are no longer considered media of concern for the Site. Indoor air is not a medium of concern based on the results of the vapor intrusion assessment conducted in 2007, 2010, and 2014 and approved by Ecology (2011, 2014). Surface water is not considered a medium of concern because the COC concentrations in groundwater have been reduced to concentrations less than applicable cleanup levels established in the Site Closure Report Addendum and updated cleanup levels discussed in this letter.



Contaminant Fate and Transport

PCE was released from the historical dry cleaning machine at the Former Cleaning Center of Redmond facility. The PCE migrated through the building foundation into shallow soil and groundwater. Dissolved-phase PCE migrated with the flow of groundwater off the Property to the northwest. An SVE remediation system was installed in 2003 to address concentrations of PCE in soil and groundwater. Performance and confirmational soil and groundwater monitoring data collected at the Site between 2003 and 2007 demonstrated that the SVE remediation system was effective in cleaning up PCE in soil and groundwater to concentrations less than MTCA Method A cleanup levels, and the prior release of PCE at the Site no longer represented a threat to human health or the environment.

Nature and Extent of Contamination

Field work conducted by Alisto Engineering Group (1999) confirmed a release of PCE to soil and groundwater from the dry cleaning machine at the Former Cleaning Center of Redmond facility. Additional soil and groundwater sampling conducted by GeoEngineers, Inc. (2001) bounded the extent of PCE in soil and groundwater. PCE in soil was bounded to an area beneath the slab of the northern commercial building and proximate to the historical dry cleaning machine by soil sample results from borings B-1, B-6, and B-7. PCE in groundwater was bounded to the north-northeast of the source area by groundwater sample results from boring B-4 and monitoring well MW-1, to the source area by groundwater sample results from monitoring well MW-3.

Farallon installed an SVE well through the concrete slab in the former location of the dry cleaning machine inside the Former Cleaning Center of Redmond facility in August 2003. The SVE well was installed to facilitate operation of an SVE remediation system to remove concentrations of PCE in soil at the source area. Operation of the SVE remediation system mitigated or sufficiently decreased the flux of PCE from the source in the vadose (unsaturated) zone to groundwater, resulting in termination of active remediation of groundwater. Concentrations of PCE in groundwater declined during the 3-year operation of the SVE remediation system, which started in August 2003 and ended in August 2006.

Farallon (2006a) conducted an assessment of deep groundwater quality in August 2006 that was performed in response to a letter from Ecology (2006) that stated, "the vertical extent of contamination, in particular tetrachloroethene, in groundwater above the cleanup level(s) has not been determined," among other opinions. The assessment of deep groundwater quality included collection of reconnaissance groundwater samples from boring FB-1, which was advanced by a hollow-stem auger drill rig to a depth of 70 feet bgs down-gradient of monitoring well MW-7 (Figure 2). Reconnaissance groundwater samples were collected from boring FB-1 at depths of 12.5, 31.5, and 68.5 feet bgs during drilling. The analytical results for PCE in all three of the reconnaissance groundwater samples collected were less than the MTCA Method A cleanup level of 5 micrograms per liter (μ g/l) for PCE, confirming that concentrations of



PCE in groundwater attenuated with depth as shown on Figure 4 of the Site Closure Report Addendum.

In accordance with an agreement with Ecology from a September 18, 2006 meeting (Farallon 2006b), in 2006 and 2007 Farallon conducted confirmation soil sampling proximate to the former dry cleaning machine, collected indoor air samples from the nearest tenant space downgradient of the Former Cleaning Center of Redmond facility, and conducted confirmation groundwater monitoring. According to laboratory analytical results, PCE was present at concentrations less than the MTCA Method A cleanup level of 0.05 milligrams per kilogram in confirmation soil samples collected from the Site, confirming that the SVE remediation system was effective in reducing PCE concentrations. Four quarters of confirmation groundwater monitoring were completed at monitoring wells MW-1 through MW-3, MW-7, and MW-9 in August and November 2006, and in February and May 2007. Confirmation groundwater monitoring at monitoring well MW-8, proximate to the Sammamish River, had previously been completed from June 2001 through August 2004. The estimated direction of groundwater flow was to the northwest during confirmation groundwater monitoring events, consistent with prior monitoring events at the Site. PCE was not detected at concentrations exceeding the MTCA Method A cleanup level of 5 μ g/l in confirmation groundwater samples collected from the Site.

Vapor intrusion assessments were conducted in June 2007 and June 2010 as part of the remedial investigation and regulatory closure activities at the Property, respectively. Based on the results of the confirmation soil and groundwater sampling, and the vapor intrusion assessments, on April 1, 2011 Ecology (2011) issued a No Further Action determination for the Property. Additional vapor intrusion assessment was conducted in March 2014 as a condition of the Property-specific No Further Action determination. Results of the additional vapor intrusion assessment demonstrated that residual concentrations of PCE in the subsurface are protective of commercial workers and meet MTCA cleanup standards for protection of human health and the environment.

Potential Exposure Pathways

Two types of exposure risk were identified due to the presence of PCE in groundwater resulting from a historical release of the dry cleaning solvent PCE from the dry cleaning machine at the Former Cleaning Center of Redmond facility. These exposure risks are associated with human and terrestrial ecological receptors. Potential exposure pathways to humans included exposure to contaminated soil, groundwater, and indoor air. The exposure pathways are further discussed below and diagramed on the attached Figure 4.

Soil Exposure Pathway

Human exposure pathways for shallow soil include direct contact, inhalation of fugitive dust, and soil leaching to groundwater and subsequent exposure to such groundwater. The direct contact pathway considers both dermal contact with and ingestion of soil.



The direct contact, inhalation, and soil leaching to groundwater pathways are no longer complete, because PCE concentrations in soil and groundwater have been reduced to concentrations less than applicable cleanup levels established for the Site through the cleanup action implemented by operation of the SVE remediation system from August 2003 to August 2006. Confirmation monitoring of soil, groundwater, and indoor air confirm that these soil exposure pathways are incomplete (Farallon 2007).

Groundwater Exposure Pathway

Human exposure pathways for groundwater include the direct contact pathway, which comprises both the dermal contact and ingestion pathways, and groundwater discharged to a surface water.

The direct contact and discharge to surface water pathways are not complete because PCE concentrations in groundwater have been reduced to concentrations less than applicable cleanup levels established for the Site through implementation of the cleanup action. Results from confirmational groundwater monitoring and SVE remediation system performance monitoring demonstrated that the source of PCE in soil has been remediated, resulting in reduction of PCE concentrations in groundwater to less than the MTCA Method A cleanup level (Farallon 2007, 2017). Confirmation groundwater monitoring confirms that these groundwater exposure pathways are incomplete (Farallon 2007).

Indoor Air Exposure Pathway

Human exposure via inhalation includes exposure to indoor air. The results of the indoor air monitoring conducted in 2007, 2010, and 2014 confirmed that low to non-detect concentrations of PCE in indoor air were protective of the vapor intrusion pathway for the commercial exposure scenario for the northern commercial building on the Property (Farallon 2007, 2010, 2014). Based on current Property uses, the commercial exposure scenario is the applicable screening level for comparison purposes, and no further action is necessary regarding the vapor intrusion pathway (Ecology 2011, 2014). PCE concentrations detected in confirmation groundwater samples down-gradient of the Property do not exceed current MTCA Method B screening levels and therefore the vapor intrusion pathway is incomplete for that portion of the Site (Ecology 2009). Ecology (2014) considers the confirmational indoor air monitoring completed.

Ecological Exposure Pathway

Farallon evaluated ecological exposure pathways pertaining to aquatic and terrestrial organisms. Soil exposure pathways include ingestion and dermal contact by terrestrial organisms. Groundwater exposure pathways include ingestion and dermal contact by aquatic and terrestrial organisms through discharge of COCs to surface water and ingestion of aquatic organisms after discharge to surface water.

COC concentrations in soil formerly were present in the source area beneath the northern commercial building on the Property and have been reduced to concentrations less than the



MTCA Method A cleanup level through operation of the SVE remediation system (Farallon 2007). A TEE previously submitted to Ecology for the Site on March 1, 2011 documented that the cleanup conducted to protect human health receptors was protective of ecological receptors. A copy of the TEE submittal is included as Attachment D. Based on these findings, the ingestion and dermal contact exposure routes for ecological exposure pathways in soil are incomplete.

COC concentrations in groundwater have been reduced to concentrations less than applicable cleanup levels established in the Site Closure Report Addendum and updated cleanup levels detailed under item 4 below. These cleanup levels are protective of the designated/beneficial use of the surface water; therefore, these ecological exposure pathways for groundwater and surface water are incomplete.

4. Discuss the selection of cleanup levels for the Site.

The following is a discussion of the cleanup levels established for the Site.

Soil

Farallon (2007) previously established the MTCA Method A cleanup level for unrestricted land use of 0.05 milligram per kilogram as the cleanup level for PCE in soil at the Cleaning Center of Redmond Site under Ecology Voluntary Cleanup Program Identification No. NW1324.

Groundwater

Farallon (2007) previously established the MTCA Method A cleanup level for unrestricted land use of 5 μ g/l as the cleanup level for PCE at the Cleaning Center of Redmond Site under Ecology Voluntary Cleanup Program Identification No. NW1324. Ecology (2011) concurred with this cleanup level for the Site in the No Further Action determination for the Property. This cleanup level applies to the portion of the Site up-gradient of the proposed conditional point of compliance, former monitoring well MW-8, encompassing former monitoring wells MW-1 through MW-7 and MW-9 (Table 1). Screening levels for the degradation products trichloroethene (TCE), cis-1,2-dichloroethene, and vinyl chloride that were applicable at the time the cleanup was conducted have been included in Table 1 for reference.

Due to the proximity of the northwestern portion of the Site to the Sammamish River, Farallon recommends the use of Washington State Surface Water Quality Criteria (Table 240 of WAC 173-201A-240, updated August 2016) as the basis for the groundwater cleanup level for PCE at the proposed conditional point of compliance on the northwestern portion of the Site to protect the designated/beneficial uses of the surface water. No freshwater aquatic life water quality criteria have been established for PCE, so human health criteria for the consumption of water and aquatic organisms will be used. The water quality criterion for PCE in Table 240 of WAC 173-201A-240 is more stringent than the MTCA Method A cleanup level. The selected groundwater cleanup level for PCE at the conditional point of compliance is $4.9 \mu g/l$ (Table 240, WAC 173-201A-240) (Table 2).



Farallon developed screening levels for TCE, cis-1,2-dichloroethene (cis-1,2-DCE), and vinyl chloride for comparison criteria at the proposed conditional point of compliance (Table 2). These screening levels include:

- Surface water quality criterion of 0.38 μ g/l for TCE from Table 240 of WAC 173-201A-240;
- Standard MTCA Method B value of 16 μ g/l for cis-1,2-DCE from MTCA Cleanup Levels and Risk Calculations for Groundwater; and
- MTCA Method A cleanup level of 0.2 μg/l for vinyl chloride from Table 720-1 of WAC 173-340-900, as revised in 2013.

Indoor Air

Farallon (2014) previously established a MTCA Method B calculated cleanup level for PCE that was protective of commercial workers at 50.2 micrograms per cubic meter. Ecology (2011) also references a cleanup level of 0.93 micrograms per cubic meter for TCE in the No Further Action determination for the Property.

5. Provide figures that show soil data collected in 1999 and 2001.

Historical analytical data and figures from the reports prepared by Alisto Engineering Group (1999) and GeoEngineers, Inc. (2001) are included in this letter report as Attachments B and C, respectively.

6. Provide an updated version of Figure 1, *Site Vicinity Map* from the Site Closure Report Addendum that shows more of the area surrounding the Property, particularly to the east.

An updated version of Figure 1 is provided with this letter report.

7. Only PCE groundwater results were shown in the analytical summary tables for the Site Closure Addendum even though other constituents of concern were sampled.

Concentrations of PCE, TCE, cis-1,2-DCE, and vinyl chloride have been included in Tables 1 and 2 of this letter report. Table 1 compares existing data to the cleanup levels established for the Site in the *Site Closure Report, Cleaning Center of Redmond, 15796 Redmond Way, Redmond, Washington* dated September 21, 2007, prepared by Farallon. These cleanup levels are applicable for the up-gradient portion of the Site encompassing former monitoring wells MW-1 through MW-7 and MW-9. Table 2 includes the cleanup level protective of surface water that was established for PCE at the conditional point of compliance, former monitoring well MW-8, in the Site Closure Report Addendum. Screening levels protective of the groundwater to surface water pathway are provided in Table 2 for TCE, cis-1,2-dichloroethene, and vinyl chloride. These screening levels are discussed in the response to Item 4 above.



8. Ensure that data has been submitted to the Environmental Information Management (EIM) database.

Analytical data collected by Farallon was uploaded to the EIM database in 2011 and 2014. Email acknowledgements from Ecology documenting these submittals are included as Attachment E.

CLOSING

Farallon appreciates the opportunity to provide environmental consulting services for this project. Please contact Brani Jurista at (425) 295-0800 if you have questions or need additional information.

Sincerely,

Farallon Consulting, L.L.C.

h. Moor

Jennifer L. Moore Senior Scientist

Branolar Brani Jurista, L.G., P.G.

Senior Geologist

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Attachments: Figure 1, Site Vicinity Map

Figure 1, Sile Figure 1, Sile Figure 2, Groundwater Elevation Contours and PCE Concentrations in Groundwater
Figure 3, Cross Section A-A'
Figure 4, Human and Ecological Exposure Pathway Analysis
Table 1, Summary of Groundwater Analytical Results – HVOCs
Table 2, Summary of Groundwater Analytical Results at Conditional Point of
Compliance – HVOCs
Attachment A, References
Attachment B, Excerpts from 1999 Alisto Engineering Group Report
Attachment C, Excerpts from 2001 GeoEngineers, Inc. Report
Attachment D, Site-Specific Terrestrial Ecological Evaluation
Attachment E, EIM Submittal Acknowledgments

cc: Mr. Tom Markl, CEO; Nelson Legacy Group, L.L.C. (by email) Mr. William Joyce; Joyce Ziker Parkinson PLLC (by email)

JLM/BJ:cm

FIGURES

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION Former Cleaning Center of Redmond 15796 Redmond Way Redmond, Washington

Farallon PN: 650-001







Figure 4 Human and Ecological Exposure Pathway Analysis Former Cleaning Center of Redmond 15796 Redmond Way **Redmond**, Washington Farallon PN: 650-001



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TABLES

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION Former Cleaning Center of Redmond 15796 Redmond Way Redmond, Washington

Farallon PN: 650-001

Table 1Summary of Groundwater Analytical Results - HVOCsFormer Cleaning Center of RedmondRedmond, WashingtonFarallon PN: 650-001

			Analytical Results (micrograms per liter) ¹			
Well/Sample Identification	Date Sampled	Sample Collected By	Tetrachloroethene	Trichloroethene	cis-1,2-Dichloroethene	Vinyl Chloride
	3/6/2000	GeoEngineers	1.6	<1.0	<5.0	<5.0
	8/8/2000	GeoEngineers	5.4	<1.0	<5.0	<5.0
	12/20/2000	Farallon	2.7	< 0.20	< 0.20	< 0.20
MW-1	6/6/2001	Farallon	1.3	< 0.20	<0.20	< 0.20
	6/28/2002	Farallon	2.1	< 0.20	<0.20	< 0.20
	8/13/2003	Farallon	1.2	< 0.20	<0.20	< 0.20
	11/12/2003	Farallon	3.3	0.22	< 0.20	< 0.20
	2/18/2004	Farallon	2.9	< 0.20	< 0.20	< 0.20
	5/10/2004	Farallon	4.0	< 0.20	< 0.20	<0.20
	8/27/2004	Farallon	8.5	0.84	1.2	0.76
	2/15/2006	Farallon	2.4	< 0.20	<0.20	<0.20
	8/23/2006	Farallon	3.3	< 0.20	< 0.20	<0.20
	11/21/2006	Farallon	4.5	0.26	< 0.20	<0.20
	2/28/2007	Farallon	2.3	< 0.20	<0.20	< 0.20
	5/15/2007	Farallon	3.3	< 0.20	<0.20	<0.20
	3/6/2000	GeoEngineers	<1.0	<1.0	<5.0	<5.0
	8/8/2000	GeoEngineers	2.9	<1.0	<5.0	<5.0
	12/20/2000	Farallon	2.9	< 0.20	<0.20	< 0.20
	6/6/2001	Farallon	1.9	< 0.20	<0.20	<0.20
	6/28/2002	Farallon	0.81	< 0.20	<0.20	<0.20
	8/13/2003	Farallon	0.99	< 0.20	<0.20	<0.20
	11/12/2003	Farallon	0.66	< 0.20	<0.20	<0.20
MW-2	2/18/2004	Farallon	0.88	< 0.20	<0.20	<0.20
	5/10/2004	Farallon	0.54	< 0.20	<0.20	<0.20
	8/27/2004	Farallon	0.56	< 0.20	<0.20	<0.20
	2/15/2006	Farallon	1.1	< 0.20	<0.20	<0.20
	8/23/2006	Farallon	1.0	<0.20	<0.20	<0.20
	11/21/2006	Farallon	1.1	<0.20	<0.20	<0.20
	2/28/2007	Farallon	0.83	<0.20	<0.20	<0.20
	5/15/2007	Farallon	1.30	<0.20	<0.20	<0.20
	3/6/2000	GeoEngineers	<1.0	<1.0	<5.0	<5.0
	8/8/2000	GeoEngineers	<1.0	<1.0	<5.0	<5.0
	12/20/2000	Farallon	0.34	<0.20	<0.20	<0.20
	6/6/2001	Farallon	2.0	<0.20	<0.20	<0.20
	6/28/2002	Farallon	2.0	<0.20	<0.20	<0.20
	8/13/2003	Farallon	1.3	<0.20	0.49	<0.20
MW 2	2/18/2004	Farallon	4.3	0.21	<0.20	<0.20
IVI W -5	2/18/2004	Farallon	2.8	<0.20	<0.20	<0.20
	8/27/2004	Farallon	5.5	0.20	0.20	<0.20
	2/15/2004	Farallon	2.1	<0.43	<0.24	<0.20
	8/23/2006	Farallon	2.1	<0.20	<0.20	<0.20
	11/21/2006	Farallon	5.0	0.20	<0.20	<0.20
	2/28/2007	Farallon	1.8	<0.21	<0.20	<0.20
	5/15/2007	Farallon	2.5	<0.20	<0.20	<0.20
	3/6/2000	GeoEngineers	50	<1.0	<5.0	<5.0
	8/8/2000	GeoEngineers	<u>0</u> 2	<1.0	<5.0	<5.0
	12/20/2000	Farallon	28	0.43	0.78	<0.20
MW-4	6/6/2001	Farallon	16	0.32	0.80	<0.20
	6/28/2002	Farallon	14	0.5	1.50	<0.20
			Well	Removed 2003		
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IVITCA Cleanup Lev	eis for Groundwate	C1	5.0	5.0	00	0.4

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Table 1Summary of Groundwater Analytical Results - HVOCsFormer Cleaning Center of RedmondRedmond, WashingtonFarallon PN: 650-001

			Analytical Results (micrograms per liter) ¹			
Well/Sample		Sample Collected				
Identification	Date Sampled	By	Tetrachloroethene	Trichloroethene	cis-1,2-Dichloroethene	Vinyl Chloride
	3/6/2000	GeoEngineers	<1.0	<1.0	<5.0	<5.0
	8/8/2000	GeoEngineers	<1.0	<1.0	<5.0	<5.0
	12/20/2000	Farallon	2.0	<0.20	<0.20	< 0.20
	6/6/2001	Farallon	1.7	<0.20	<0.20	< 0.20
	6/28/2002	Farallon	1.6	<0.20	<0.20	< 0.20
MW-5	8/13/2003	Farallon	0.2	<0.20	<0.20	< 0.20
11110 5	11/12/2003	Farallon	3.6	<0.20	<0.20	< 0.20
	2/18/2004	Farallon	4.8	<0.20	<0.20	<0.20
	5/10/2004	Farallon	1.6	<0.20	<0.20	< 0.20
	8/27/2004	Farallon	1.4	<0.20	<0.20	< 0.20
	2/15/2006	Farallon	4.8	< 0.20	< 0.20	< 0.20
	8/23/2006	Farallon	1.0	<0.20	<0.20	< 0.20
	3/6/2000	GeoEngineers	11	<1.0	<5.0	<5.0
	8/8/2000	GeoEngineers	27	<1.0	<5.0	<5.0
MW-6	12/20/2000	Farallon	15	0.24	< 0.20	< 0.20
WI W -0	6/6/2001	Farallon	8.6	< 0.20	<0.20	< 0.20
	6/28/2002	Farallon	6.3	<0.20	0.29	< 0.20
			Well I	Removed 2003		
	3/28/2000	GeoEngineers	15	3	<5.0	<5.0
	8/8/2000	GeoEngineers	14	<1.0	<5.0	<5.0
	12/21/2000	Farallon	12	< 0.20	< 0.20	< 0.20
	6/6/2001	Farallon	7.6	< 0.20	< 0.20	< 0.20
	6/28/2002	Farallon	3.9	< 0.20	<0.20	< 0.20
	8/13/2003	Farallon	5.3	< 0.20	< 0.20	< 0.20
	11/12/2003	Farallon	4.5	< 0.20	< 0.20	< 0.20
MW-7	2/18/2004	Farallon	3.6	< 0.20	<0.20	< 0.20
	5/10/2004	Farallon	3.3	< 0.20	< 0.20	< 0.20
	8/30/2004	Farallon	3.6	< 0.20	<0.20	< 0.20
	2/15/2006	Farallon	2.5	< 0.20	< 0.20	< 0.20
	8/23/2006	Farallon	2.3	< 0.20	< 0.20	< 0.20
	11/21/2006	Farallon	2.2	< 0.20	<0.20	< 0.20
	2/28/2007	Farallon	2.1	<0.20	< 0.20	< 0.20
	5/15/2007	Farallon	2.9	<0.20	<0.20	< 0.20
	4/14/2000	GeoEngineers	7.4	<1.0	<5.0	<5.0
	8/8/2000	GeoEngineers	8.5	<1.0	<5.0	<5.0
	12/20/2000	Farallon	5.7	0.33	0.48	< 0.20
	6/6/2001	Farallon	3.9	0.23	0.36	<0.20
MW-8	6/28/2002	Farallon	4.1	0.29	0.46	< 0.20
	8/13/2003	Farallon	3.4	0.26	0.46	<0.20
	11/12/2003	Farallon	0.62	<0.20	< 0.20	< 0.20
	2/18/2004	Farallon	0.3	< 0.20	< 0.20	< 0.20
	5/10/2004	Farallon	2.8	0.25	0.37	< 0.20
	8/27/2004	Farallon	0.43	< 0.20	< 0.20	< 0.20
	8/13/2003	Farallon	7.4	0.27	0.42	<0.20
	11/12/2003	Farallon	3.7	<0.20	<0.20	< 0.20
	2/18/2004	Farallon	2.9	<0.20	<0.20	<0.20
	5/10/2004	Farallon	2.5	<0.20	<0.20	<0.20
MW-9	8/27/2004	Farallon	3.0	<0.20	< 0.20	< 0.20
111 11 - 2	2/15/2006	Farallon	2.5	<0.20	<0.20	<0.20
	8/23/2006	Farallon	1.6	<0.20	<0.20	<0.20
	11/21/2006	Farallon	2.1	<0.20	<0.20	<0.20
	2/28/2007	Farallon	2.4	<0.20	<0.20	<0.20
	5/15/2007	Farallon	1.8	<0.20	<0.20	<0.20
MTCA Cleanup Lev	els for Groundwate	er	5.0 ²	5.0 ²	80 ²	0.2 ²

Table 1Summary of Groundwater Analytical Results - HVOCsFormer Cleaning Center of RedmondRedmond, WashingtonFarallon PN: 650-001

			Analytical Results (micrograms per liter) ¹				
Well/Sample Identification	Date Sampled	Sample Collected By	Tetrachloroethene	Trichloroethene	cis-1,2-Dichloroethene	Vinyl Chloride	
Reconnaissance Groundwater Samples							
FB-1-GW-12.5	8/21/2006	Farallon	2.4	< 0.20	< 0.20	< 0.20	
FB-1-GW-31.5	8/21/2006	Farallon	0.95	< 0.20	< 0.20	< 0.20	
FB-1-GW-68.5	8/21/2006	Farallon	<0.20	<0.20	< 0.20	< 0.20	
MTCA Cleanup Levels for Groundwater		5.0 ²	5.0 ²	80 ²	0.2 ²		

NOTES:

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

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

¹ Analyzed by U.S. Environmental Protection Agency Method 8260B.

² Cleanup levels established for site closure in the *Site Closure Report, Cleaning Center of Redmond, 15796 Redmond Way, Redmond, Washington* prepared by Farallon, dated September 21, 2007.

Farallon = Farallon Consulting, L.L.C. GeoEngineers = GeoEngineers, Inc. PCE = tetrachloroethene TCE = trichloroethene
Table 2 Summary of Groundwater Analytical Results at Conditional Point of Compliance - HVOCs **Former Cleaning Center of Redmond Redmond**, Washington Farallon PN: 650-001

				Analytical Results (m	icrograms per liter) ¹	
Well/Sample Identification	Date Sampled	Sample Collected By	Tetrachloroethene	Trichloroethene	cis-1,2-Dichloroethene	Vinyl Chloride
	4/14/2000	GeoEngineers	7.4	<1.0	<5.0	<5.0
	8/8/2000	GeoEngineers	8.5	<1.0	<5.0	<5.0
	12/20/2000	Farallon	5.7	0.33	0.48	< 0.20
	6/6/2001	Farallon	3.9	0.23	0.36	< 0.20
MW 8	6/28/2002	Farallon	4.1	0.29	0.46	< 0.20
IVI VV -0	8/13/2003	Farallon	3.4	0.26	0.46	< 0.20
	11/12/2003	Farallon	0.62	< 0.20	<0.20	< 0.20
	2/18/2004	Farallon	0.3	< 0.20	<0.20	< 0.20
	5/10/2004	Farallon	2.8	0.25	0.37	< 0.20
	8/27/2004	Farallon	0.43	< 0.20	<0.20	< 0.20
MTCA Cleanup Levels for Groundwater		4.9 ²	0.38 ²	16 ³	0.2 4	

NOTES:

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

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

¹ Analyzed by U.S. Environmental Protection Agency Method 8260B.

Farallon = Farallon Consulting, L.L.C. GeoEngineers = GeoEngineers, Inc. PCE = tetrachloroethene TCE = trichloroethene

² Value from Table 240, Section 240 of the Water Quality Standards for Surface Waters of the State of Washington, as established in Chapter 173-201A of the Washington Administrative Code, as amended August 1, 2016.
 ³ Washington State Model Toxics Control Act Cleanup Regulation (MTCA) Cleanup Levels and Risk Calculations, Standard Method B Values for

Groundwater, https://fortress.wa.gov/ecy/clarc/Reporting/ChemicalQuery.aspx.

⁴ MTCA Method A Cleanup Levels for Groundwater, Table 720-1 of Section 900 of Chapter 173-340 of the Washington Administrative Code, as revised 2013.

ATTACHMENT A REFERENCES

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION Former Cleaning Center of Redmond 15796 Redmond Way Redmond, Washington

Farallon PN: 650-001

REFERENCES

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- . 2014. Letter Regarding Conformational Monitoring Successfully Completed: Cleaning Center of Redmond, 15796 Redmond Way, Redmond, WA 98052. From Michael Kuntz. To Thomas Markl, Nelson Real Estate Management, L.L.C. June 13.
 - . 2018. Letter Regarding Request for Additional Information to Provide Opinion on the Investigation and Cleanup under the VCP for the following Contaminated Site: Cleaning Center of Redmond, 15796 Redmond Way, Redmond WA 98052. From Sonia Fernández. To Thomas Markl, Nelson Group Properties, L.L.C. March 2.

ATTACHMENT B EXCERPTS FROM 1999 ALISTO ENGINEERING GROUP REPORT

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION Former Cleaning Center of Redmond 15796 Redmond Way Redmond, Washington

Farallon PN: 650-001

TABLE 1 - SUMMARY OF RESULTS OF SOIL AND GROUNDWATER SAMPLING CLEANING CENTER OF REDMOND REDMOND WAY REDMOND, WASHINGTON

PROJECT NO. 20-74

(ppm) 5 270 >1000 350 322	(mg/kg) ND<0.05 ND<0.05 2.86 1.40	(mg/kg) ND<0.05 ND<0.05 ND<0.05	(mg/kg) ND<0.5 ND<0.5	(mg/kg) 2.71 25.3	(mg/kg) ND<0.05	(mg/kg)	(mg/kg)	
5 270 >1000 350 322	ND<0.05 ND<0.05 2.86 1.40	ND<0.05 ND<0.05 ND<0.05	ND<0.5 ND<0.5	2.71	ND<0.05			
270 >1000 350 322	ND<0.05 2.86 1.40	ND<0.05 ND<0.05	ND<0.5	25.3	140<0.05			
>1000 350 322	2.86 1.40	ND<0.05	249 ST 2.		ND<0.05	ND<0.05	ND<0.05	NCA
350 322	1.40		ND<0.5	664	ND<0.05	ND<0.05	ND<0.05	NCA
322		ND<0.05	ND<0.5	131	ND<0.05	ND<0.05	ND -0.05	NGA
OLL	1.55	ND<0.05	ND<0.5	106	ND<0.05	ND<0.05	ND<0.05	NCA
			0.5	0.5	20	0.5		
	(µg/)	(µg⁄l)	(µg/l)	(µg⁄l)	(µg/l)	(µg/l)	(µg/l)	
	1.72	1.49	ND<0.5	6530	ND<1.00	6.46	ND<1.00	NCA
ip levels			5.0	5.0	200.0	5.0	0.2	
	up levels	(µg/l) 1.72 up levels	(μg/l) (μg/l) 1.72 1.49 up levels	(µg/l) (µg/l) (µg/l) 1.72 1.49 ND<0.5 up levels 5.0	(µg/l) (µg/l) (µg/l) (µg/l) 1.72 1.49 ND<0.5 6530 up levels 5.0 5.0	(μg/l) (μg/l) (μg/l) (μg/l) (μg/l) 1.72 1.49 ND<0.5 6530 ND<1.00 p levels 5.0 5.0 200.0	(μg/l) (μg/l) (μg/l) (μg/l) (μg/l) 1.72 1.49 ND<0.5	(μg/l) (μg/l) (μg/l) (μg/l) (μg/l) (μg/l) (μg/l) 1.72 1.49 ND<0.5

 fbg
 Feet below ground surface

 mg/kg
 Milligrams per kilogram

 (μg/l)
 Micograms per liter

 ND
 Not detected above the indicated detection limit

 NCA
 North Creek Analytical

 PID
 Photoionization detector









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 (ax 541,382,7588)

Alisto Engineering	Project:	Dry Cleaning	Sampled:	1/28/99
1145 12th Avenue, Suite C4A	Project Number:	20-73	Received:	1/28/99
Issaquah, WA 98027	Project Manager:	Dave Cooper	Reported:	2/4/99 11:18

ANALYTICAL REPORT FOR SAMPLES:

Sample Description	Laboratory Sample Number	Sample Matrix	Date Sampled
HB-EI	B901497-01	Soil	1/28/99
HB-N1	B901497-02	Soil	1/28/99
HB-S1	B901497-03	Soil	1/28/99
HB-W1	B901497-04	Soil	1/28/99

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Kirk Gendron, Project Manager

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

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Alisto Engineering	Project:	Dry Cleaning	Sampled:	1/28/99	
1145 12th Avenue, Suite C4A	Project Number:	20-73	Received:	1/28/99	
Issaquah. WA 98027	Project Manager:	Dave Cooper	Reported:	2/4/99 11:18	

Halogenated Volatile Organics by EPA Method 8021B (modified) North Creek Analytical - Bothell

	Batch	Date	Date	Surrogate	Reporting			
Analyte	Number	Prepared	Analyzed	Limits	Limit	Result	Units	Notes*
HR_F1			P0014	07.01			C - 11	
Bromodichloromethane	0200017	7/1/00	2/1/00	27-01	0.0500	ND	<u>3011</u>	
Bromoform	"	11	2/1/22		0.0500	ND	mg/kg dry	
Bromomethane					0.0500	ND		
Carbon tetrachloride					0.0500	ND		
Chlorobenzene					0.0500	ND		
Chloroethane			н		0.0500	ND		
Chloroform					0.0500	ND		
Chloromethane	R.		н		0.0300	ND		
Dibromochloromethana			ñ		0.0500	ND		
1.2 Dichlorohonzana	Ū.				0.0500	ND		
1.2 Dichlorobenzene					0.0500	ND		
1,3-Dichlorobenzene	II.				0.0500	ND		
1,4-Dichlorobenzene					0.0500	ND		
1,1-Dichlorethane					0.0500	ND		
1,2-Dichloroethane					0.0500	ND		
1,1-Dichloroethene	12.5				0.0500	ND		
cis-1,2-Dichloroethene					0.0500	ND	.0	
trans-1.2-Dichloroethene					0.0500	ND		
1,2-Dichloropropane					0.0500	ND	"	
cis-1,3-Dichloropropene					0.0500	ND		
trans-1,3-Dichloropropene					0.0500	ND		
Methylene chloride					0.500	ND		
1,1,2,2-Tetrachloroethane			o.		0.0500	ND	н.	
Tetrachloroethene	9				0.0500	2.71		
1,1,1-Trichloroethane		н			0.0500	ND		
1,1,2-Trichloroethane		n,	a		0.0500	ND		
Trichloroethene		н	. 10		0.0500	ND	Ψ.	
Trichlorofluoromethane			-0		0.0500	ND	- n.	
Vinyl chloride	ų		-0-		0.0500	ND		
Surrogate: 4-BFB (ELCD)	"	n	"	50.0-150		86.9	%	
IB-NI			R90149	7-02			Soil	
Bromodichloromethane	0290017	7/1/99	2/1/99		0.0500	ND	ma/ka dry	
Bromoform	"		"		0.0500	ND	" "	
Bromomethane		·u-	н		0.0500	ND		
Carbon tetrachloride	10				0.0500	ND	. ii	
Chlorobenzene		п			0.0500	ND		
Thloroethane		n			0.0500	ND	1.	
² hloroform					0.0500	NU		
		0	2		0.0500	ND	19	

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Kirk Gendron, Project Manager

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Alisto Engineering	Project:	Dry Cleaning	Sampled:	1/28/99
1145 12th Avenue, Suite C4A	Project Number:	20-73	Received:	1/28/99
Issaquah, WA 98027	Project Manager:	Dave Cooper	Reported:	2/4/99 11:18

Halogenated Volatile Organics by EPA Method 8021B (modified) North Creek Analytical - Bothell

	Batch	Date	Date	Surrogate	Reporting			
Analyte	Number	Prepared	Analyzed	Limits	Limit	Result	Units	Notes*
HB-N1 (continued)			B0014	07.07			Sail	
Chloromethane	0290017	2/1/00	2/1/00	27-02	0.0500	ND	<u>son</u> ma/ka day	
Dibromochloromethane	"	"	11/33		0.0500	ND	mg/kg ury	
1.2-Dichlorobenzene			ín.		0.0500	ND		
1.3-Dichlorobenzene					0.0500	ND		
1.4-Dichlorobenzene					0.0500	ND	ü	
L Dichloroethane		H.			0.0500	ND		
1.2 Dichloroethane					0.0500	ND		
1,2-Dichloroothane	n.				0.0500	ND	ä	
ais 1.2 Dishlarasthana	a la la la la la la la la la la la la la				0.0300	ND		
tis-1,2-Dichloroethene	1.0				0.0500	ND		
trans-1,2-Dichloroethene					0.0500	ND		
1,2-Dichloropropane					0.0500	ND		
cis-1,3-Dichloropropene		4			0.0500	ND		
trans-1,3-Dichloropropene					0.0500	ND		
Methylene chloride					0.500	ND	"	
1,1,2,2-Tetrachloroethane					0.0500	ND		
Tetrachloroethene			2/2/99		0.500	25.3		
1,1,1-Trichloroethane			2/1/99		0.0500	ND	"	
1,1,2-Trichloroethane	1. A A A A A A A A A A A A A A A A A A A				0.0500	ND		
Trichloroethene		<u>0</u>	ii.		0.0500	ND		
Trichlorofluoromethane	ų				0.0500	ND		
Vinyl chloride	n		N.		0.0500	ND	.0	
Surrogate: 4-BFB (ELCD)	"	"	"	50.0-150		78.9	%	
HB-S1			B90149	7-03			Soil	
Bromodichloromethane	0290017	2/1/99	2/1/99		0.0500	ND	mg/kg drv	
Bromoform					0.0500	ND	"	
Bromomethane					0.0500	ND	н.	
Carbon tetrachloride	**				0.0500	ND		
Chlorobenzene			n.		0.0500	ND		
Chloroethane		н	u		0.0500	ND		
Chloroform					0.0500	ND		
Chloromethane	0		<u>a</u>		0.0500	ND	- U	
Dibromochloromethane					0.0500	ND	a	
1.2-Dichlorobenzene	a .	n.			0.0500	2.86		
1.3-Dichlorobenzene			**		0.0500	0 0841	н	
4-Dichlorobenzene					0.0500	0.186		
1-Dichloroethane		n			0.0500	ND		
2-Dichloroethans					0.0500	NID	a n	
					0.0200	UND.		

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Kirk Gendron, Phject Manager



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Alisto Engineering	Project:	Dry Cleaning	Sampled:	1/28/99
1145 12th Avenue, Suite C4A	Project Number:	20-73	Received:	1/28/99
Issaquah, WA 98027	Project Manager:	Dave Cooper	Reported:	2/4/99 11:18

Halogenated Volatile Organics by EPA Method 8021B (modified) North Creek Analytical - Bothell

the state of the s	Daten	Date	Date	Sunogate	Reporting			
Analyte	Number	Prepared	Analyzed	Limits	Limit	Result	Units	Notes*
HB-S1 (continued)			B9014	97-03			Soil	
1,1-Dichloroethene	0290017	2/1/99	2/1/99		0.0500	ND	mg/kg dry	
cis-1,2-Dichloroethene		H.			0.0500	ND	"	
trans-1,2-Dichloroethene			-11		0.0500	ND	÷.	
1,2-Dichloropropane	- Q -				0.0500	ND		
cis-1,3-Dichloropropene		- n -	- 1		0.0500	ND	н	
trans-1,3-Dichloropropene			n.		0.0500	ND		
Methylene chloride	· 9		Ĥ		0.500	ND		
1,1,2,2-Tetrachloroethane					0.0500	ND		
Tetrachloroethene	iii ii		2/2/99		25.0	664	ar .	
1,1,1-Trichloroethane			2/1/99		0.0500	ND		
1,1,2-Trichloroethane					0.0500	ND		
Trichloroethene	.00	, ii			0.0500	ND		
Trichlorofluoromethane					0.0500	ND		
Vinyl chloride					0.0500	ND		
Surrogate: 4-BFB (ELCD)	"	'n	- 11	50.0-150	010000	91.9	%	
HB-W1			B90149	7-04			Soil	
Bromodichloromethane	0290017	2/1/99	2/1/99	<u></u>	0.0500	ND	ma/ka dry	
Bromoform	н		"		0.0500	ND	"	
Bromomethane					0.0500	ND		
Carbon tetrachloride		n.			0.0500	ND		
Chlorobenzene	ii I				0.0500	ND		
Chloroethane	H T				0.0500	ND		
Chloroform			600 m		0.0500	ND	de l'	
Chloromethane	<i>i</i> i 1				0.0500	ND		
Dibromochloromethane					0.0500	ND		
.2-Dichlorobenzene		н	101		0.0500	1.55		
.3-Dichlorobenzene	н				0.0500	ND		
.4-Dichlorobenzene					0.0500	ND	H.	
1-Dichloroethane					0.0500	ND		
.2-Dichloroethane	ē.	Gi. 1	ă.		0.0500	ND		
.1-Dichloroethene	i,	in .			0.0500	ND		
is-1.2-Dichloroethene					0.0500	ND		
rans-1.2-Dichloroethene		0			0.0500	ND		
2-Dichloropropage	н				0.0500	ND		
is-1 3-Dichloropropene		u .			0.0500	ND		

trans-1,3-Dichloropropene Methylene chloride

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*Refer to end of report for text of notes and definitions.

ND

ND

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.,

Kirk Gendron, Project Manager

North Creek Analytical, Inc. Environmental Laboratory Network

0.0500

0.500



Alisto Engineering	Project:	Dry Cleaning	Sampled:	1/28/99
1145 12th Avenue, Suite C4A	Project Number:	20-73	Received:	1/28/99
Issaquah, WA 98027	Project Manager:	Dave Cooper	Reported:	2/4/99 11:18

	Batch	Date	Date Analyzed	Surrogate	Reporting			Notes*
Analyte	Number	Prepared		Limits	Limit	Result	Units	
HB-W1 (continued)			B9014	97-04			Soil	
1,1,2,2-Tetrachloroethane	0290017	2/1/99	2/1/99		0.0500	ND	mg/kg dry	
Tetrachloroethene		h	2/2/99		2.50	106	"	
1,1,1-Trichloroethane			2/1/99		0.0500	ND	n -	
1,1,2-Trichloroethane		-10			0.0500	ND	- u	
Trichloroethene					0.0500	ND	1.00	
Trichlorofluoromethane		(B)			0.0500	ND	u	
Vinyl chloride	"	Ψ.	Ū.		0.0500	ND		
Surrogate: 4-BFB (ELCD)	n	"	u	50.0-150		79.5	%	

North Creek Analytical - Bothell Kirk Gendron Project Manager

*Refer to end of report for text of notes and definitions.

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Alisto Engineering	Project:	Dry Cleaning	Sampled:	1/28/99
1145 12th Avenue, Suite C4A	Project Number:	20-73	Received:	1/28/99
Issaquah, WA 98027	Project Manager:	Dave Cooper	Reported:	2/4/99 11:18

Dry Weight Determination North Creek Analytical - Bothell

Sample Name	Lab ID	Matrix	Result	Units
HB-E1	B901497-01	Soil	93.9	%
HB-N1	B901497-02	Soil	91.7	%
HB-S1	B901497-03	Soil	89.6	%
HB-W1	B901497-04	Soil	91.4	%

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Alisto Engineering	Project:	Dry Cleaning	Sampled:	1/28/99
1145 12th Avenue, Suite C4A	Project Number:	20-73	Received:	1/28/99
Issaquah. WA 98027	Project Manager:	Dave Cooper	Reported:	2/4/99 11:18

Halogenated Volatile Organics by EPA Method 8021B (modified)/Quality Control North Creek Analytical - Bothell

	Date	Spike	Sample	QC		Reporting Limit	Recov.	RPD	RPD	
Analyte	Analyzed	Level	Result	Result	Units	Recov. Limits	%	Limit	%	Notes*
Batch: 0290017	Data Prana	rad: 2/1/0	n		Extracti	on Mathada ED	A 5020D	MOD		
Blank	0200017 B	1 K 1	2		Extracti	on Methou: Er	A JUJUD	Inteorit		
Bromodichloromethane	2/1/00	UNI		NID	and the de	. 0.0500				
Bromoform	2/1/99			ND	mg/kg ui	cy 0.0500				
Bromomethane				ND		0.0500				
Carbon tatrachlarida	"			ND		0.0500				
Chlorobenzene				ND		0.0500				
Chloroethane				ND		0.0500				
Chloroform	н			ND		0.0500				
Chloromethane	n.			ND		0.0500				
Dibromochloromethane				ND		0.0500				
1.2 Dichlorobenzene				ND		0.0500				
1.3-Dichlorobenzene				ND		0.0500				
1.4 Dichlorobenzene				ND		0.0500				
1.4 Dichlosothane	<i>i</i> i			ND		0.0500				
1,1-Dichloroethane				ND		0.0500				
1,2-Dichloroethane				ND		0.0500				
rig 1.2 Dichloroethene				ND		0.0500				
trans 1.2 Dichloraethere				ND		0.0500				
1.2 Disblassesses				ND		0.0500				
aia 1.2 Dishlasananana				ND		0.0500				
trans 1.3 Dichlessener				ND		0.0500				
Mathedra and Andrewski and Andre	2			ND	1	0.0500				
Methylene chloride				ND		0.500				
1,1,2,2-1 etrachioroethane				ND		0.0500				
Tetrachloroethene				ND		0.0500				
1,1,1-1 richloroethane				ND	"	0.0500				
1,1,2-Trichloroethane				ND		0.0500				
Trichloroethene				ND		0.0500				
Trichlorofluoromethane	"			ND		0.0500				
Vinyl chloride	"			ND	a	0.0500				
Surrogate: 4-BFB (ELCD)	"	2.00		1.89	"	50.0-150	94.5			
LCS	0290017-BS1	1								
Chlorobenzene	2/1/99	1.00		0.826	mg/kg dry	60.0-140	82.6			
1.1-Dichloroethene	W	1.00		0.811	"	60.0-140	81.1			
Frichloroethene		1.00		0.853	n.	60.0-140	85 3			
Surrogate: 4-DFB (ELCD)	<i>u</i>	2.00		1.76	"	50.0-150	88.0			

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*Refer to end of report for text of notes and definitions.

Kirk Gendron, Project Manager



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Alisto Engineering	Project:	Dry Cleaning	Sampled:	1/28/99
1145 12th Avenue, Suite C4A	Project Number:	20-73	Received:	1/28/99
Issaquah, WA 98027	Project Manager:	Dave Cooper	Reported:	2/4/99 11:18

Halogenated Volatile Organics by EPA Method 8021B (modified)/Quality Control North Creek Analytical - Bothell

	Date	Spike	Sample	QC	R	eporting Limit	Recov.	RPD	RPD	
Analyte	Analyzed	Level	Result	Result	Units	Recov. Limits	%	Limit	%	Notes*
Matrix Spike	0290017-MS	1 B	901497-01							
Chlorobenzene	2/1/99	1.07	ND	0.951	mg/kg dr	y 60.0-140	88.9			
1,1-Dichloroethene		1.07	ND	0.906	,	60.0-140	84.7			
Trichloroethene	н	1.07	ND	0.962	ų	60.0-140	89.9			
Surrogate: 4-BFB (ELCD)	"	2.13		1.88	11	50.0-150	88.3			
Matrix Spike Dup	0290017-MSI	D1 B	901497-01							
Chlorobenzene	2/1/99	1.07	ND	0.955	mg/kg dry	60.0-140	89.3	30.0	0.449	
1,1-Dichloroethene	11	1.07	ND	0.864		60.0-140	80.7	30.0	4.84	
Trichloroethene	u.	1.07	ND	0.852	-14	60.0-140	79.6	30.0	12.2	
Surrogate: 4-BFB (ELCD)	"	2.13		1.76	"	50.0-150	82.6			

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Alisto Engineering 1145 12th Avenue, Suite C4A		Project: Project Number:	Dry Cleaning 20-73	Sampled: Received:	1/28/99 1/28/99
Issaquah.	aquah, WA 98027 Project Manager:		Dave Cooper	Reported:	2/4/99 11:18
		No	tes and Definitions		
#	Note				
DET	Analyte DETECTED				
ND	Analyte NOT DETECTED	at or above the reporting lin	nit		
NR	Not Reported				
dry	Sample results reported on a	a dry weight basis			
Recov.	Recovery				
RPD	Relative Percent Difference				

VP	
M	

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nue NE, Suite 101, Bothell, WA 98011-9508 ax 425 420,9210 Seattle 18939 1201 425.420.926. 425.420.920. ax 425.420.9210 Spokane East 11115 Montgomery, Suite B, Spokane, WA 99206-4776 509.924.9200 fax 509.924.9200 Portland 9405 SW Nimbus Avenue, Beaverton, DR 97008-7132 503.906.9200 fax 503.906.9210 Bend 20354 Empire Avenue, Suite E-9, Bend, OR 97708-1883 541.383.9310 fax 541.382.7588

Alisto Engineering	Project:	Dry Cleaning	Sampled:	1/28/99	7
1145 12th Avenue, Suite C4A	Project Number:	20-73	Received:	1/28/99	
Issaquah, WA 98027	Project Manager:	Dave Cooper	Reported:	2/16/99 09:58	

ANALYTICAL REPORT FOR SAMPLES:

Sample Description	Laboratory Sample Number	Sample Matrix	Date Sampled
HB-EI	B901497-01	Soil	1/28/99
HB-N1	B901497-02	Soil	1/28/99
HB-S1	B901497-03	Soil	1/28/99
HB-W1	B901497-04	Soil	1/28/99
HB-S2	B901497-06	Soil	1/28/99

North Greek Analytical - Bothell

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

5

North Creek Analytical, Inc. Environmental Laboratory Network

Kirk Gendron Ploject Manager



Alisto Engineering	Project:	Dry Cleaning	Sampled:	1/28/99
1145 12th Avenue, Suite C4A	Project Number:	20-73	Received:	1/28/99
Issaquah, WA 98027	Project Manager:	Dave Cooper	Reported:	2/16/99 09:58

	Batch	Date	Date	Surrogate	Reporting			
Analyte	Number	Prepared	Analyzed	Limits	Limit	Result	Units	Notes*
UD F1			00014	07.01			6.1	
Bromodichloromethane	0200017	2/1/00	2/1/00	97-01	0.0500	ND	<u>5011</u>	
Bromoform	0290017	2/1/99	2/1/99		0.0500	ND	mg/kg dry	
Desmanathere					0.0500	ND		
Carbon total hand					0.0500	ND		
Chloride			. g		0.0500	ND		
Chlorobenzene					0.0500	ND		
Chloroformane					0.0500	ND		
Chloroform					0.0500	ND		
Chloromethane					0.0500	ND		
Dibromochloromethane			-		0.0500	ND		
1.2-Dichlorobenzene	2				0.0500	ND		
1.3-Dichlorobenzene					0.0500	ND		
1.4-Dichlorobenzene					0.0500	ND		
1.1-Dichloroethane					0.0500	ND		
1,2-Dichloroethane					0.0500	ND		
1,1-Dichloroethene					0.0500	ND		
cis-1.2-Dichloroethene					0.0500	ND		
trans-1.2-Dichloroethene					0.0500	ND	200	
1.2-Dichloropropane	n.				0.0500	ND		
cis-1,3-Dichloropropene	н		н.		0.0500	ND	- 19	
trans-1.3-Dichloropropene			н		0.0500	ND	9	
Methylene chloride					0.500	ND		
1.1.2.2-Tetrachloroethane					0.0500	ND	н	
Tetrachloroethene	C.0 (1)	-91-	. U		0.0500	2.71		
1,1,1-Trichloroethane	n -	e			0.0500	ND		
1.1.2-Trichloroethane	H		н		0.0500	ND	11	
Trichloroethene	n				0.0500	ND	00	
Trichlorofluoromethane	- II	n.	н		0.0500	ND		
Vinyl chloride		n			0.0500	ND		
Surrogate: 4-BFB (ELCD)	"	"	"	50.0-150		86.9	%	
HB-NI			B00140	7-02			Soil	
Bromodichloromethane	0200017	2/1/00	2/1/00	<u>7-02</u>	0.0500	ND	<u>oon</u> mu/ka.dm/	
Bromoform	0290017	2/1/99	2/1/99		0.0500	ND	"	
Bromowethane					0.0500	ND		
Carbon tetrachlaride					0.0500	ND		
Chlorobenzene	<i>u</i>				0.0500	NID	n.	
Chloroothane			w.		0.0500	ND		
hland and a		Ω.			0.0500	NUN		
moroion					0.0500	ND		

North Creek Analyzical - Bothell

*Refer to end of report for text of notes and definitions.

Kirk Gendron) Project Manager

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Alisto Engineering	Project:	Dry Cleaning	Sampled:	1/28/99
1145 12th Avenue, Suite C4A	Project Number:	20-73	Received:	1/28/99
Issaquah, WA 98027	Project Manager:	Dave Cooper	Reported:	2/16/99 09:58

Halogenated Volatile Organics by EPA Method 8021B (modified) North Creek Analytical - Bothell

	Batch	Date	Date	Surrogate	Reporting			
Analyte	Number	Prepared	Analyzed	Limits	Limit	Result	Units	Notes*
			Doot					
HB-INI (continued)	0200017	2/1/00	<u>B9014</u>	97-02	0.0500	210	<u>Soil</u>	
Chloromethane	0290017	2/1/99	2/1/99		0.0500	ND	mg/kg dry	
Dibromochloromethane					0.0500	ND		
1,2-Dichlorobenzene					0.0500	ND		
1,3-Dichlorobenzene	2				0.0500	ND		
1,4-Dichlorobenzene		u	-0-		0.0500	ND	n.	
1,1-Dichloroethane	0		.0.		0.0500	ND		
1,2-Dichloroethane		.n.			0.0500	ND	. N.	
1,1-Dichloroethene	"	.n.	(C)		0.0500	ND	H	
cis-1.2-Dichloroethene					0.0500	ND		
trans-1,2-Dichloroethene	1 0 11	a,	н		0.0500	ND	*	
1.2-Dichloropropane	u	н			0.0500	ND		
cis-1,3-Dichloropropene	(n .)		10		0.0500	ND		
trans-1.3-Dichloropropene			10 J		0.0500	ND	- 10 - 10	
Methylene chloride		Ξ.			0.500	ND	0	
1.1.2,2-Tetrachloroethane					0.0500	ND		
Tetrachloroethene		н	2/2/99		0.500	25.3	0	
1.1.1-Trichloroethane			2/1/99		0.0500	ND	u.	
1.1.2-Trichloroethane		- H -			0.0500	ND		
Trichloroethene					0.0500	ND		
Trichlorofluoromethane					0.0500	ND	- 00	
Vinvl chloride			n.		0.0500	ND		
Surrogate: 4-BFB (ELCD)	"	"	"	50.0-150	0.0200	78.9	%	
							0.5	
<u>HB-S1</u>	and should be a		<u>B90149</u>	<u>7-03</u>	1 505 7 arts	3.75	Soil	
Bromodichloromethane	0290017	2/1/99	2/1/99		0.0500	ND	mg/kg dry	
Bromoform		· · · ·			0.0500	ND		
Bromomethane	"		. н <u>с</u>		0.0500	ND		
Carbon tetrachloride	j¢.		н		0.0500	ND		
Chlorobenzene			4		0.0500	ND		
Chloroethane		a			0.0500	ND	n	
Chloroform					0.0500	ND	- 0.	
Chloromethane		u.			0.0500	ND		
Dibromochloromethane					0.0500	ND	11	
1.2-Dichlorobenzene	8	0	ш		0.0500	2.86	- W	
1,3-Dichlorobenzene					0.0500	0.0841	u	
1,4-Dichlorobenzene			91		0.0500	0.186	-0	
1,1-Dichloroetbane		Ĥ	1		0.0500	ND	<u>.</u>	
1.2-Dichloroethane			n .		0.0500	ND	π	
					0.0000	110		

North Creek Analytical - Bothell

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Alisto Engineering	Project:	Dry Cleaning	Sampled:	1/28/99
1145 12th Avenue, Suite C4A	Project Number:	20-73	Received:	1/28/99
Issaquah, WA 98027	Project Manager:	Dave Cooper	Reported:	2/16/99 09:58

Halogenated Volatile Organics by EPA Method 8021B (modified) North Creek Analytical - Bothell

A Design of	Batch	Date	Date	Surrogate	Reporting			
Analyte	Number	Prepared	Analyzed	Limits	Limit	Result	Units	Notes*
UP S1 (continued)			P0014	07.03			C . 11	
1 Dichloroathana	0200017	2/1/00	2/1/00	97-03	0.0500	ND	<u>5011</u>	
ria 1.2 Dichlospathana	0290017	2/1/99	2/1/99		0.0300	ND	mg/kg dry	
cis-1.2-Dichloroethene	w				0.0500	ND		
trans-1,2-Dichloroethene					0.0500	ND		
1.2-Dichloropropane					0.0500	ND		
cis-1.3-Dichloropropene					0.0500	ND		
trans-1,3-Dichloropropene					0.0500	ND		
Methylene chloride					0.500	ND		
1,1,2,2-Tetrachloroethane	**				0.0500	ND		
Tetrachloroethene			2/2/99		25.0	664		
1,1,1-Trichloroethane	"		2/1/99		0.0500	ND		
1,1,2-Trichloroethane					0.0500	ND	M	
Trichloroethene	**				0.0500	ND		
Trichlorofluoromethane	. 10	. 11			0.0500	ND	n.	
Vinyl chloride		. 11	11		0.0500	ND	Ĥ I	
Surrogate: 4-BFB (ELCD)	"	"	"	50.0-150		91.9	%	
HB-W1			B90149	07-04			Soil	
Bromodichloromethane	0290017	2/1/99	2/1/99		0.0500	ND	mg/kg dry	
Bromoform					0.0500	ND	"	
Bromomethane		1 10 D	÷.		0.0500	ND	- n	
Carbon tetrachloride	9	. n			0.0500	ND		
Chlorobenzene	0	Citer 1			0.0500	ND	- C0-	
Chloroethane	ũ I	10	û.		0.0500	ND	- n	
Chloroform			- u		0.0500	ND	-n-	
Chloromethane					0.0500	ND		
Dibromochloromethane					0.0500	ND		
1.2-Dichlorobenzene		0			0.0500 0.0500	1.55		
1 3-Dichlorobenzene		v			0.0500	ND		
1 4-Dichlorobenzene					0.0500	ND	- air	
1.1-Dichloroethana	n.		ø		0.0500	ND		
1.2-Dichloroethane					0.0500	ND		
1.1. Dichloroethane		μ.			0.0500	ND		
sis 1.2 Diablamathana					0.0500	ND		
trans 1.2 Diskland					0.0500	ND		
1.2 Dishlass					0.0500	ND		
1.2-Dichloropropane					0.0500	ND		
cis-1,3-Dichloropropene			n.		0.0500	ND		
trans-1.3-Dichloropropene					0.0500	ND		
Methylene chloride					0.500	ND		

North Creek Analytical - Bothell

Kirk Gendron, Project Manager



Alisto Engineering	Project:	Dry Cleaning	Sampled:	1/28/99
1145 12th Avenue, Suite C4A	Project Number:	20-73	Received:	1/28/99
Issaquah. WA 98027	Project Manager:	Dave Cooper	Reported:	2/16/99 09:58

	Batch	Date	Date	Surrogate	Reporting	T 6.335		
Analyte	Number	Prepared	Analyzed	Limits	Limit	Result	Units	Notes*
HB-W1 (continued)			B9014	97-04			Soil	
1.1.2.2-Tetrachloroethane	0290017	2/1/99	2/1/99		0.0500	ND	mg/kg drv	
Tetrachloroethene	н		2/2/99		2.50	106	"	
1.1.1-Trichloroethane	16	н	2/1/99		0.0500	ND	u.	
1.1.2-Trichloroethane					0.0500	ND	0	
Trichloroethene	.ti				0.0500	ND	a a a a a a a a a a a a a a a a a a a	
Trichlorofluoromethane	<u>1</u>		n.		0.0500	ND	<i>u</i>	
Vinyl chloride					0.0500	ND	и	
Surrogate: 4-BFB (ELCD)		"		50.0-150	0.0500	79.5	%	
							5.5	
HB-S2			<u>B90149</u>	7-06			Soil	
Bromodichloromethane	0290351	2/11/99	2/11/99		0.0500	ND	mg/kg dry	
Bromoform			a		0.0500	ND		
Bromomethane					0.0500	ND		
Carbon tetrachloride					0.0500	ND		
Chlorobenzene	34				0.0500	ND		
Chloroethane			20.5		0.0500	ND		
Chloroform	"	n	"		0.0500	ND		
Chloromethane	и.	a	u.		0.0500	ND	"	
Dibromochloromethane	"	. 6	u.		0.0500	ND	0	
1,2-Dichlorobenzene			0		0.0500	1.40	м.	
1,3-Dichlorobenzene		a.			0.0500	0.0543		
1,4-Dichlorobenzene					0.0500	0.115		
1,1-Dichloroethane	"		n		0.0500	ND		
1.2-Dichloroethane		n.	.0		0.0500	ND	ŧř	
1,1-Dichloroethene			н		0.0500	ND	н	
cis-1,2-Dichloroethene		- 11			0.0500	ND	0.7	
trans-1,2-Dichloroethene		100	9		0.0500	ND	0	
1,2-Dichloropropane		- 9	n,		0.0500	ND	n	
cis-1,3-Dichloropropene			C.H.		0.0500	ND		
trans-1,3-Dichloropropene	0	a			0.0500	ND	0.0	
Methylene chloride	0	- 9			0.500	ND		
1,1,2,2-Tetrachloroethane	- ú -	a.			0.0500	ND	E.W.	
Tetrachloroethene	0	u.	10		2.50	131	min -	
1.1.1-Trichloroethane		w	'n		0.0500	ND		
1.1.2-Trichloroethane	<i>n</i>				0.0500	ND		
Trichloroethene	.0		n -		0.0500	ND	ar .	
Frichlorofluoromethane		9			0.0500	ND	n.	
Vinyl chloride		"			0.0500	ND	- 11	

North Greek Analytical - Bothell

Kirk Gendron, Project Manager

North Creek Analytical, Inc.



Alisto Engineering	Project:	Dry Cleaning	Sampled:	1/28/99
1145 12th Avenue, Suite C4A	Project Number:	20-73	Received:	1/28/99
Issaquah, WA 98027	Project Manager:	Dave Cooper	Reported:	2/16/99 09:58

Analyte	Batch Number	Date Prepared	Date Analyzed	Surrogate Limits	Reporting Limit	Result	Units	Notes*
HB-S2 (continued)			<u>B9014</u>	<u>97-06</u>			Soil	
Surrogate: 4-BFB (ELCD)	0290351	2/11/99	2/11/99	50.0-150		84.4	%	

North Cleek Analytical - Bothell Kirk Gendron, Project Manager

*Refer to end of report for text of notes and definitions.

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Alisto Engineering	Project:	Dry Cleaning	Sampled:	1/28/99
1145 12th Avenue, Suite C4A	Project Number:	20-73	Received:	1/28/99
Issaquah, WA 98027	Project Manager:	Dave Cooper	Reported:	2/16/99 09:58

Dry Weight Determination North Creek Analytical - Bothell

Sample Name	Lab ID	Matrix	Result	Units
HB-E1	B901497-01	Soil	93.9	%
HB-N1	B901497-02	Soil	91.7	%
IB-S1	B901497-03	Soil	89.6	%
B-WI	B901497-04	Soil	91.4	%
IB-S2	B901497-06	Soil	88.7	%

North Creek Analytical - Bothell

Kirk Gentlrdn Project Manager



Alisto Engineering	Project:	Dry Cleaning	Sampled:	1/28/99
1145 12th Avenue, Suite C4A	Project Number:	20-73	Received:	1/28/99
Issaquah, WA 98027	Project Manager:	Dave Cooper	Reported:	2/16/99 09:58

	Date	Spike	Sample	QC	R	eporting Limit	Recov.	RPD	RPD	
Analyte	Analyzed	Level	Result	Result	Units	Recov. Limits	%	Limit	%	Notes
Batch: 0290017	Date Pret	pared: 2/1/9	9		Extractio	n Method: EP	A 5030B	[MeOH]		
Blank	0290017-)	BLKI								
Bromodichloromethane	2/1/99	1000		ND	mg/kg dry	0.0500				
Bromoform	н			ND		0.0500				
Bromomethane	9			ND		0.0500				
Carbon tetrachloride	v			ND	. 11	0.0500				
Chlorobenzene				ND		0.0500				
Chloroethane				ND		0.0500				
Chloroform	"			ND		0.0500				
Chloromethane	н			ND	0.00	0.0500				
Dibromochloromethane				ND		0.0500				
1,2-Dichlorobenzene				ND		0.0500				
1.3-Dichlorobenzene				ND		0.0500				
1,4-Dichlorobenzene	Ξŧ.			ND		0.0500				
1,1-Dichloroethane	. 1			ND		0.0500				
1,2-Dichloroethane				ND		0.0500				
1.1-Dichloroethene	- 11			ND	0	0.0500				
cis-1.2-Dichloroethene	.10			ND		0.0500				
trans-1,2-Dichloroethene	.0			ND	n -	0.0500				
1,2-Dichloropropane				ND		0.0500				
cis-1.3-Dichloropropene				ND	n	0.0500				
trans-1.3-Dichloropropene				ND	Ú.	0.0500				
Methylene chloride				ND	ii.	0.500				
1,1,2,2-Tetrachloroethane	- 00			ND		0.0500				
Tetrachloroethene				ND		0.0500				
1.1.1-Trichloroethane				ND	H.	0.0500				
1.1.2-Trichloroethane				ND		0.0500				
Trichloroethene				ND	0 ×	0.0500				
Trichlorofluoromethane	0			ND	п	0.0500				
Vinyl chloride	11			ND	0	0.0500				
Surrogate: 4-BFB (ELCD)	11	2.00		1.89	<i>n</i>	50.0-150	94.5			
LCS	0290017-B	<u>S1</u>								
Chlorobenzene	2/1/99	1.00		0.826	mg/kg dry	60.0-140	82.6			
1.1-Dichloroethene		1.00		0.811	"	60.0-140	81.1			
Trichloroethene	ir.	1.00		0.853	(H.)	60.0-140	85.3			
Surrogate: 4-BFB (ELCD)	"	2.00		1.76	"	50.0-150	88.0			

North Creek Analytical - Bothell

Kirk Gendron Project Manager

North Creek Analytical, Inc. Environmental Laboratory Network



Alisto Engineering	Project:	Dry Cleaning	Sampled:	1/28/99
1145 12th Avenue, Suite C4A	Project Number:	20-73	Received:	1/28/99
Issaquah, WA 98027	Project Manager:	Dave Cooper	Reported:	2/16/99 09:58

1.11	Date	Spike	Sample	QC	Re	porting Limit	Recov.	RPD	RPD	
Analyte	Analyzed	Level	Result	Result	Units	Recov. Limits	%	Limit	%	Notes*
Matrix Spike	0290017-M	SI B	901497-01							
Chlorobenzene	2/1/99	1.07	ND	0.951	mg/kg dry	60.0-140	88.9			
1,1-Dichloroethene		1.07	ND	0.906	n 1	60.0-140	84.7			
Trichloroethene		1.07	ND	0.962	ũ.	60.0-140	89.9			
Surrogate: 4-BFB (ELCD)	"	2.13		1.88	"	50.0-150	88.3			
Matrix Spike Dup	0290017-M	SD1 B9	01497-01							
Chlorobenzene	2/1/99	1.07	ND	0.955	mg/kg dry	60.0-140	89.3	30.0	0.449	
1,1-Dichloroethene	11	1.07	ND	0.864		60.0-140	80.7	30.0	4.84	
Trichloroethene	a.	1.07	ND	0.852		60.0-140	79.6	30.0	12.2	
Surrogate: 4-BFB (ELCD)	"	2.13		1.76	"	50.0-150	82.6			
Batch: 0290351	Date Prepar	ed: 2/11/9	2		Extraction	Method: EPA	5030B	MeOH		
Blank	0290351-BL	KI								
Bromodichloromethane	2/11/99			ND	mg/kg dry	0.0500				
Bromoform				ND	n.	0.0500				
Bromomethane	"			ND	, n	0.0500				
Carbon tetrachloride	"			ND	ψ.	0.0500				
Chlorobenzene				ND		0.0500				
Chloroethane				ND		0.0500				
Chloroform	<i>n</i>			ND	н	0.0500				
Chloromethane	, m			ND	н	0.0500				
Dibromochloromethane				ND	n -	0.0500				
1,2-Dichlorobenzene				ND		0.0500				
1,3-Dichlorobenzene				ND		0.0500				
1,4-Dichlorobenzene				ND		0.0500				
1.1-Dichloroethane	u			ND	- H - 1	0.0500				
1.2-Dichloroethane				ND		0.0500				
1,1-Dichloroethene				ND	iii	0.0500				
cis-1.2-Dichloroethene				ND	n	0.0500				
rans-1.2-Dichloroethene				ND		0.0500				
1.2-Dichloropropane	9			ND		0.0500				
sis-1.3-Dichloropropene				ND	w.	0.0500				
rans-1.3-Dichloropropene				ND		0.0500				
vlethylene chloride				ND		0.500				
.1.2.2-Tetrachloroethane				ND		0.0500				
Cetrachloroethene	Ω.			ND	н	0.0500				
.1.1-Trichloroethane				ND	- a	0.0500				
1.2-Trichlorochane				ND		0.0500				
						0.0000				

North Creek Analytical - Bothell

Kirk Gendron. Project Manager



Alisto Engineering	Project:	Dry Cleaning	Sampled:	1/28/99
1145 12th Avenue, Suite C4A	Project Number:	20-73	Received:	1/28/99
Issaquah. WA 98027	Project Manager:	Dave Cooper	Reported:	2/16/99 09:58

	Date	Spike	Sample	QC	R	eporting Limit	Recov.	RPD	RPD	1.5
Analyte	Analyzed	Level	Result	Result	Units	Recov. Limits	%	Limit	%	Notes*
Blank (continued)	0290351-BI	LKI								
Trichloroethene	2/11/99			ND	mg/kg dry	0.0500				
Trichlorofluoromethane	.0			ND		0.0500				
Vinyl chloride				ND)j	0.0500				
Surrogate: 4-BFB (ELCD)	"	2.00		2.00	"	50.0-150	100			
LCS	0290351-BS	51								
Chlorobenzene	2/11/99	1.00		0.824	mg/kg dry	60.0-140	82.4			
1,1-Dichloroethene		1.00		0.815		60.0-140	81.5			
Trichloroethene	0	1.00		0.848	5 HC	60.0-140	84.8			
Surrogate: 4-BFB (ELCD)	"	2.00		1.83	<i>n</i>	50.0-150	91,5			-
Matrix Spike	0290351-M	<u>S1 B9</u>	002165-03							
Chlorobenzene	2/11/99	1.15	ND	0.992	mg/kg dry	60.0-140	86.3			
1,1-Dichloroethene	H .	1.15	ND	0.881		60.0-140	76.6			
Trichloroethene	u .	1.15	ND	0.973	, n	60.0-140	84.6			
Surrogate: 4-BFB (ELCD)	"	2.30		2.02	"	50.0-150	87.8			
Matrix Spike Dup	0290351-MS	SD1 B9	002165-03							
Chlorobenzene	2/11/99	1.15	ND	0.985	mg/kg dry	60.0-140	85.7	30.0	0.698	
1,1-Dichloroethene	0	1.15	ND	0.984	n	60.0-140	85.6	30.0	11.1	
Trichloroethene	n	1.15	ND	1.01	0	60.0-140	87.8	30.0	3.71	
Surrogate: 4-BFB (ELCD)	<i>n</i> - 1	2.30		2.04	"	50.0-150	88.7			

North Creek Analytical Bothell

Kirk Gendron, Project Manager

*Refer to end of report for text of notes and definitions.

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Alisto Engineering	Project:	Dry Cleaning	Sampled:	1/28/99
1145 12th Avenue, Suite C4A	Project Number:	20-73	Received:	1/28/99
Issaquah, WA 98027	Project Manager:	Dave Cooper	Reported:	2/16/99 09:58

Notes and Definitions

#	Note
DET	Analyte DETECTED
ND	Analyte NOT DETECTED at or above the reporting limit
NR	Not Reported
dry	Sample results reported on a dry weight basis
Recov.	Recovery
RPD	Relative Percent Difference

North Creek Analytical - Bothell

Kirk Gendron, Project Manager

NORTH CREEK ANALYTICAL Environmental Laboratory Services

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CHAIN OF CUSTODY REPORT

Work Order # <u>B 901497</u>

REPORT TO:			INVOI	CE TO:							1		
ATTENTION Alista - 1		0			d., .	1.					TUR	AROUND REQU	JEST in Business Days *
ADDRESS: 1(45-124)	Aur AV	CUA	ATTEN		an	ne	-					Organic & In	organic Analyses
Issagual La	A 980	\sim	ADDRE	SS:							Sianciant		3 2 1 Duy
MIONE: 425 837-394	4 FAX: 83	7-8543	PONU	MALE 20	7-7	2	NCA	(NUNT -			-	Fuels & Hy	drocarbon Analyses
PROJECT NAME DEV CLOC	ninc		Analysis	7	1	7	7		17	1		Sturklard	La Day
PRUJECT NUMBER: 20-73			Request:	88	/	//	/ /	/	/	//	OTHER	1	
SAMPLED BY: Bill Done	cherty		1	Star /	/	/	/	/ /	/ /	//	* Turnarouni	Specify: Requests less than :	aundard muy incur Rush Charges.
CLIENT SAMPLE	SAMPLING /	NCA SAMPLE ID	à l	\$/ /	/	11	/ /	/	/	/	MATRIX	# OF	
	V alia	(Laboratory Use Only)							(-1		(W. S. A. O)	CONTAINERS	COMMENTS
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18939 120th Avenue N.E., Suite 101, Bothell, WA 98011-9508
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N OF CUSTODY REPORT

NORTH

REEK

ANALYTICAL

Environmental Laboratory Services

CHAIN OF CUSTODY REPORT

Work Order #

REPORT TO: INVOICE TO: TURNAROUND REQUEST in Business Days * ATTENTION: coler ATTENTION: Sam Organic & Inorganic Analyses C4A ADDRESS: 10 ADDRESS: I have 98027 Fuels & Hydrocarbon Analyses 837-8543 FAX: 20 Day PHONE: P.O. NUMBER: 5 3-4 2 1 NCA QUOTE #: PROJECT NAME: Analysis Request: OTHER PROJECT NUMBER: O Sparity 8021 * Turnaround Requests less than standard may incur Rush Charges SAMPLED BY: -PI 80 CLIENT SAMPLE SAMPLING -NCA SAMPLE ID MATRIX IDENTIFICATION DATE/TIME (Laboratory Use Only) (W. S. A. O) CONTAIN B901-197-01 X 10:2D X 02 :30 03 2:00 × 04 5 X × 5 05 P. Of .5 X ore 5 1 5 14:50 07 2 5 18 X N 15:20 10. 160 RELINQUISHED BY (Signature) DATE RECEIVED BY (Signuture) DATE :30 PRINT NAME: FIRM: TIME: / PRINT NAME FIRM: TIME RELINQUISHED BY Ingenters DATE: RECEIVED BY (Sugarant DATE: PRINT NAME: FIRM: TIME: PRINT NAME: FIRM TIME: ADDITIONAL REMARKS: PAGE OF Car



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Alisto Engineering	Project:	Cleaning Center of Remond	Sampled:	3/4/99
1145 12th Avenue, Suite C4A	Project Number:	20-74	Received:	3/4/99
Issaquah, WA 98027	Project Manager:	Bill Dougherty	Reported:	3/10/99 12:34

ANALYTICAL REPORT FOR SAMPLES:

Sample Description	Laboratory Sample Number	Sample Matrix	Date Sampled
WP-WI	B903115-01	Water	3/4/99

North Creek Analytical - Bothell

A Ň Kink Gendron, Project Manager

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

> North Creek Analytical, Inc. Environmental Laboratory Network



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Alisto Engineering	Project:	Cleaning Center of Remond	Sampled:	3/4/99
1145 12th Avenue, Suite C4A	Project Number:	20-74	Received:	3/4/99
Issaquah, WA 98027	Project Manager:	Bill Dougherty	Reported:	3/10/99 12:34

Halogenated Volatile Organics by EPA Method 8021B (modified) North Creek Analytical - Bothell

	Batch	Date	Date	Surrogate	Reporting			
Analyte	Number	Prepared	Analyzed	Limits	Limit	Result	Units	Notes*
<u>WP-W1</u>			B9031	15-01			Water	
Bromodichloromethane	0390216	3/8/99	3/8/99		1.00	ND	119/1	
Bromoform		u	н		1.00	ND	"	
Bromomethane			н.		1.00	ND	- C. N	
Carbon tetrachloride		0			1.00	ND		
Chlorobenzene	n	- ai	000		1.00	ND		
Chloroethane		н	H		1.00	ND	, ni	
Chloroform					1.00	ND		
Chloromethane		- H-			1.00	ND	e.	
Dibromochloromethane		н	- 11		1.00	ND	u .	
1,2-Dichlorobenzene					1.00	1.72		
1,3-Dichlorobenzene	in in		19.		1.00	ND		
1,4-Dichlorobenzene			le.		1.00	ND		
1,1-Dichloroethane	in .				1.00	ND		
1,2-Dichloroethane					1.00	ND	ÿ	
1,1-Dichloroethene		H			1.00	ND		
cis-1,2-Dichloroethene	. W.	a.			1.00	1.49	W.	
trans-1,2-Dichloroethene		- iii			1.00	ND		
1.2-Dichloropropane					1.00	ND	u.	
cis-1,3-Dichloropropene	in Chi		ni i		1.00	ND		
trans-1,3-Dichloropropene					1.00	ND		
Methylene chloride			34		5.00	ND	00.0	
1,1,2,2-Tetrachloroethane	Ω.	0.3			1.00	ND		
Tetrachloroethene	. e		3/9/99		200	6530	u .	
1,1.1-Trichloroethane			3/8/99		1.00	ND		
1,1,2-Trichloroethane	- in				1.00	ND		
Trichloroethene	.9		.u.		1.00	6.46		
Trichlorofluoromethane	10 -				1.00	ND	- m	
Vinyl chloride			-n-		1.00	ND		
Surrogate: 4-BFB (ELCD)	"	"		50.0-150		86.5	%	

North Creek Analytical - Bothell Kirk Gendron, Ifoject Manager



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Alisto Engineering	Project:	Cleaning Center of Remond	Sampled:	3/4/99
1145 12th Avenue, Suite C4A	Project Number:	20-74	Received:	3/4/99
Issaquah, WA 98027	Project Manager:	Bill Dougherty	Reported:	3/10/99 12:34

Halogenated Volatile Organics by EPA Method 8021B (modified)/Quality Control North Creek Analytical - Bothell

L. Tour	Date	Spike	Sample	QC		Reporting Limit	Recov.	RPD	RPD
Analyte	Analyzed	Level	Result	Result	Units	Recov. Limits	%	Limit	% Note
Rotch: 0300716	Data Prena	mad. 2/9/0	0		Fature	des Maderla CD		IDCTI	
Blank	Date Prepared: 3/8/99				Extrac	tion Method: EP	A SUSUB	IE/II	
Dialik	<u>0390210-B</u>	LKI		NID		1.00			
Bromotorm	3/0/99			ND	ug/1	1.00			
Bromomothana	n.			ND		1.00			
Carbon tetrachlorida				ND		1.00			
Chlorobanzana				ND		1.00			
Chlorosthana				ND		1.00			
Chloroform				ND	a	1.00			
Chloromothene				ND		1.00			
Difference blance				ND		1.00			
Dibromocniorometnane				ND		1.00			
1,2-Dichlorobenzene				ND		1.00			
1,3-Dichlorobenzene				ND		1.00			
1,4-Dichlorobenzene				ND		1.00			
1.1-Dichloroethane				ND	"	1.00			
1.2-Dichloroethane				ND		1.00			
1.1-Dichloroethene	20			ND	"	1.00			
cis-1,2-Dichloroethene				ND		1.00			
trans-1,2-Dichloroethene				ND		1.00			
1.2-Dichloropropane				ND	a	1.00			
cis-1,3-Dichloropropene	y			ND	1.98	1.00			
trans-1,3-Dichloropropene				ND		1.00			
Methylene chloride	a			ND		5.00			
1,1,2,2-Tetrachloroethane				ND		1.00			
Tetrachloroethene				ND		1.00			
1,1.1-Trichloroethane				ND		1.00			
1,1,2-Trichloroethane	**			ND		1.00			
Trichloroethene	17 I			ND		1.00			
Trichlorofluoromethane	ų.			ND		1.00			
Vinyl chloride	u .			ND		1.00			
Surrogate: 4-BFB (ELCD)	"	10.0		10.4	"	50.0-150	104		
LCS	0390216-BS1	1							
Chlorobenzene	3/8/99	10.0		9.77	ug/l	70.0-130	97.7		
1,1-Dichloroethene		10.0		10.4	"	70.0-130	104		
Frichloroethene		10.0		9.91		70.0-130	99.1		
Surrogate: 4-BFB (ELCD)	"	10.0		9.63	"	50.0-150	96.3		

North Creek Analytical - Bothell

*Refer to end of report for text of notes and definitions.

Kirk Gendron, Project Manager



Alisto Engineering	Project:	Cleaning Center of Remond	Sampled:	3/4/99
1145 12th Avenue, Suite C4A	Project Number:	20-74	Received:	3/4/99
Issaquah, WA 98027	Project Manager:	Bill Dougherty	Reported:	3/10/99 12:34

	Date	Spike	Sample	QC		Reporting Limit	Recov.	RPD	RPD	
Analyte	Analyzed	Level	Result	Result	Units	Recov. Limits	%	Limit	%	Notes*
Matrix Spike	0390216-MS	B	903002-19							
Chlorobenzene	3/8/99	10.0	ND	8.30	ug/l	70.0-130	83.0			
1,1-Dichloroethene		10.0	ND	8.21		70.0-130	82.1			
Trichloroethene		10.0	ND	8.70		70.0-130	87.0			
Surrogate: 4-BFB (ELCD)	"	10.0		8.76	"	50.0-150	87.6			
Matrix Spike Dup	0390216-MSI	D1 B9	003002-19							
Chlorobenzene	3/8/99	10.0	ND	8.54	ug/l	70.0-130	85.4	20.0	2.85	
1.1-Dichloroethene		10.0	ND	7.96	n.	70.0-130	79.6	20.0	3.09	
Trichloroethene	.0	10.0	ND	8.08	· H ·	70.0-130	80.8	20.0	7.39	
Surrogate: 4-BFB (ELCD)	"	10.0		9.20	"	50.0-150	92.0			

North Creek Analytical - Bothell

Kirk Gendron, Project Manager

*Refer to end of report for text of notes and definitions.

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Alisto Engineering Pr 1145 12th Avenue, Suite C4A Project Nu Issaquah, WA 98027 Project Mar		Project: oject Number: ject Manager:	Cleaning Center of Remond 20-74 Bill Dougherty	Sampled: Received: Reported:	3/4/99 3/4/99 3/10/99 12:34		
		No	tes and Definitions				
#	Note						
DET	Analyte DETECTED						
ND	Analyte NOT DETECTED at or above the reporting limit						
NR	Not Reported						
dry	Sample results reported on a dry weight l	basis					

- Recov. Recovery
- RPD Relative Percent Difference

North Creek Analytical - Bothell Kirk Gendron, Project Manager


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CHAIN OF CUSTODY REPORT

2115 Work Order #

REPORT TO:		1	INVO	CE TO:										TURNAROUND REQUEST in Business Days *				
ATTENTION: MISTO ENG	incering	Group	ATTEN	TION:	S	2 6:197	<u>c</u>)	Organic & Inorg	anic Analyses		
ADDRESS: 1145-12=: 140	e 1000,	<u>C474</u>	ADDRI	ESS:	_									7	5 4	3 2 1 Same		
-Lssapuan, W	A 7802	0712	-	_										Standard	Fuels & Hydro	xarbon Analyses		
PHONE: 425 831-3744	FAX: 031	-85 43	P.O. NL	MBER:	6 /				NCA Q	JOTE #:					5 3-4	2 1 Same Day		
OJECT NAME: Geaning (a	enter of	Redwood	Analysis		N	/	/	/	/	/	/	1.	/					
PROJECT NUMBER: 20-14				. 45	7	/ /	/ /	/	/	/	/	/		OTHER	Specify:			
SAMPLED BY: 15:11 DOLLE	herty		1	N.	/	/	/	/	/	/	/	/		• Turnaround	Requests less than stan	dard may incur Rush Charges		
IDENTIFICATION	DATE/TIME	NCA SAMPLE ID (Laboratory Use Only)		×,	/	/	/	/	/	/	/	/		MATRIX	# UF			
WP-1,11	3/4/79/17.4.	RONZILE DI	X	ſſ			f		(((\neg)		(W, S, A, O)	CONTAINERS	COMMENTS		
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RELINQUISHED BY (Signature)				DATE:			RECEIVE	DBY	Signalure L							DATE		
PRINT NAME:		FIRM:		TIME:			PRINTN	AME:							FIRM	11.46		
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ATTACHMENT C EXCERPTS FROM 2001 GEOENGINEERS, INC. REPORT

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION Former Cleaning Center of Redmond 15796 Redmond Way Redmond, Washington

Farallon PN: 650-001

800 Sleater-Kinney SE, PMB #262 Lacey, Washington 98503-1127

Mobile Environmental Laboratories Environmental Sampling Services

Telephone: Fax: GeoEnginanis MAR Routing FIIO

360-459-4670

360-459-3432

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March 15, 2000

Jim Roth GeoEngineers, Inc. 8410 154th Ave. NE Redmond, WA 98052

Dear Mr. Roth:

Please find enclosed the analytical data report for the Cleaning Center of Redmond Project in Redmond, Washington. StrataProbe and Mobile Laboratory services were conducted on February 29, 2000. Soil and water samples were analyzed on and off site for Specific Halogenated Hydrocarbons and BTEX by Method 8021B.

The results of the analyses are summarized in the attached tables. All soil values are reported on a dry weight basis. Applicable detection limits and QA/QC data are included. An invoice for this work is also enclosed.

TEG Northwest appreciates the opportunity to have provided analytical services to GeoEngineers, Inc. for this project. If you have any further questions about the data report, please give me a call. It was a pleasure working with you on this project, and we are looking forward to the next opportunity to work together.

Sincerely,

michael a Korsu

Michael A. Korosec President

QA/QC FOR ANALYTICAL METHODS

GENERAL

The TEG Northwest Laboratory quality assurance and quality control (QA/QC) procedures are conducted following the guidelines and objectives which meet or exceed certification/-accreditation requirements of California DOHS, Washington DOE, and Oregon DEQ. The Quality Control Program is a consistent set of procedures which assures data quality through the use of appropriate blanks, replicate analyses, surrogate spikes, and matrix spikes, and with the use of reference standards that meet or exceed EPA standards.

When analyses are taking place on-site with the mobile lab, the need for Field Blanks or Travel/Trip Blanks is eliminated. If there is going to be a delay before sample preparation for analysis, the sample is stored at 4^o C.

ANALYTICAL METHODS

TEG Northwest Labs use analytical methodologies which are in conformity with U. S. Environmental Protection Agency (EPA), Washington DOE, and Oregon DEQ methodologies. When necessary and appropriate due to the nature or composition of the sample, TEG may use variations of the methods which are consistent with recognized standards or variations used by the industry and government laboratories.

Purgeable Volatile Halocarbons (Chlorinated Hydrocarbons, EPA 601/8021B)

A calibration standard is run at the beginning of the day. The standard must be within 15% of the continuing calibration curve value. The standard is rerun at the end of the day. All samples are prepared with a surrogate spike, and the recovery must be between 65% and 135%. At least 1 method blank is run per day.

CLEANING CENTER OF REDMOND PROJECT Redmond, Washington GeoEngineers, Inc. Project No. 3352-003-00

Specific Halogenated and Aromatic Hydrocarbons (EPA 8021B) in Water

SAMPLE DESCRIPTION		Method Blank	Method Blank	B-1	B-2	B-3	B-4	B-5	B-6
	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l
DATE SAMPLED DATE ANALYZED	MDL	2/29/00 2/29/00	2/29/00 3/1/00						
Vinyl Chloride	5.0	nd	nd	nd	nd	nd	nd	nd	nd
Benzene	1.0	nd	nd	nd	nd	nd	nd	nd	nd
Toluene	1.0	nd	nd	2.9	2.3	2.5	2.5	2.5	0.6
Ethylbenzene	1.0	nd	nd	nd	nd	nd	nd	nd	9.0 nd
Total Xylenes	1.0	nd	nd	3.4	nd	nd	nd	14	5.2
1,1-Dichloroethene	1.0	nd	nd	nd	nd	nd	nd	nd	J.Z
Methylene Chloride	1.0	nd	nd	nd	nd	nd	nd	nd	nd
Trans-1,2-dichlorethene	1.0	nd	nd	nd	nd	nd	nd	nd	nd
1,1-Dichloroethane	1.0	nd	nd	nd	nd	nd	nd	nd	nd
Cis-1,2-dichloroethene	1.0	nd	nd	nd	nd	nd	nd	nd	nd
Chloroform	1.0	nd	nd	nd	nd	nd	nd	nd	nd
1,1,1-Trichloroethane (TCA)	1.0	nd	nd	nd	nd	nd	nd	nd	nd
Carbontetrachloride	1.0	nd	nd	nd	nd	nd	nd	nd	nd
1,2-Dichloroethane	1.0	nd	nd	nd	nd	nd	nd	nd	nd
Trichloroethene (TCE)	1.0	nd	nd	nd	nd	1.0	nd	1.6	57
1,1,2-Trichloroethane	1.0	nd	nd	nd	nd	nd	nd	nd	nd
Tetrachloroethene (PCE)	1.0	nd	nd	nd	7.2	56	4.4	47	25
1,1,1,2-Tetrachloroethane	1.0	nd	nd	nd	nd	nd	nd	nd	nd
1,1,2,2-Tetrachloroethane	1.0	nd	nd	nd	nd	nd	nd	nd	nd
SURROGATE RECOVERY (%)		132	98	103	102	93	95	103	103

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE (Chlorobenzene): 65%-135%

ANALYSES PERFORMED BY: Michael Dee DATA REVIEWED BY: Sherry Chilcutt CLEANING CENTER OF REDMOND PROJECT Redmond, Washington GeoEngineers, Inc. Project No. 3352-003-00

QA/QC DATA - EPA 8021B ANALYSES

		Matrix Spike	1 L		Matrix Spike Duplicate					
	Spiked Conc. (ug/l)	Measured Conc. (ug/l)	Spike Recovery (%)	Spiked Conc. (ug/l)	Measured Conc. (ug/l)	Spike Recovery (%)	RPD (%)			
BENZENE	40	45	113%	40	49	122%	7.5%			
TOLLENE	40	46	115%	40	50	125%	8.1%			
TRICHLOROETHENE (TCE)	40	45	111%	40	49	123%	10.0%			
SURROGATE RECOVERY (%)			82%			102%	22%			

QA/QC DATA - EPA 8021B ANALYSES

	Laboratory (Control Samp	le
	Spiked Conc. (ug/l)	Measured Conc. (ug/l)	Spike Recovery (%)
BENZENE	100	105	105%
TOLUENE	100	102	102%
TRICHLOROETHENE (TCE)	100	84	84%
SURROGATE RECOVERY (%)			119%

QA/QC DATA - EPA 8021B ANALYSES

	Laboratory (Control Samp	le
	Spiked Conc. (ug/l)	Measured Conc. (ug/l)	Spike Recovery (%)
BENZENE	100	112	112%
TOLUENE	100	107	107%
TRICHLOROETHENE (TCE)	100	90	90%
SURROGATE RECOVERY (%)			75%

CLEANING CENTER OF REDMOND PROJECT

Redmond, Washington GeoEngineers, Inc.

Project No. 3352-003-00

Specific Halogenated and Aromatic Hydrocarbons (EPA 8021B) in Water

SAMPLE DESCRIPTION		B-7	B-8	B-9	B-10	B-11
	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l
DATE SAMPLED	MDL	2/29/00	2/29/00	2/29/00	2/29/00	2/29/00
DATE ANALYZED	0.01	2/29/00	2/29/00	2/29/00	3/1/00	3/1/00
Vinyl Chloride	5.0	nd	nd	nd	<250	nd
Benzene	1.0	nd	nd	nd	<50	nd
Tolucne	1.0	3.6	3.9	4.6	<50	4.6
Ethylbenzene	1.0	nd	nd	nd	<50	nd
Total Xylenes	1.0	2.5	2.9	3.6	<50	1.9
1,1-Dichloroethene	1.0	nd	nd	nd	<50	nd
Methylene Chloride	1.0	nd	nd	nd	<50	nd
Trans-1,2-dichlorethene	1.0	nd	nd	nd	<50	nd
1,1-Dichloroethane	1.0	nd	nd	nd	<50	nd
Cis-1,2-dichloroethene	1.0	8.0	nd	nd	<50	6.4
Chloroform	1.0	nd	nd	nd	<50	nd
1,1,1-Trichloroethane (TCA)	1.0	nd	nd	nd	<50	nd
Carbontetrachloride	1.0	nd	nd	nd	<50	nd
1,2-Dichloroethane	1.0	nd	nd	nd	<50	nd
Trichloroethene (TCE)	1.0	1.9	nd	nd	<50	8.7
1,1,2-Trichloroethane	1.0	nd	nd	nd	<50	nd
Tetrachloroethene (PCE)	1.0	58	3.0	1.3	2000	530
1,1,1,2-Tetrachloroethane	1.0	nd	nd	nd	<50	nd
1,1,2,2-Tetrachloroethane	1.0	nd	nd	nd	<50	nd
SURROGATE RECOVERY (%)	_	92	126	84	102	103

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE (Chlorobenzene): 65%-135%

ANALYSES PERFORMED BY: Michael Dee DATA REVIEWED BY: Sherry Chilcutt

CLEANING CENTER OF REDMOND PROJECT Redmond, Washington GeoEngineers, Inc. Project No. 3352-003-00

Specific Halogenated and Aromatic Hydrocarbons (EPA 8021B) in Soil

SAMPLE DESCRIPTION		Method Blank	Method Blank	B-1-10	B-2-12.5	B-3-15	B-4-8.5	B-5-8.5	B-6-20
	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
DATE SAMPLED DATE ANALYZED	MDL	2/29/00 2/29/00	2/29/00 3/1/00	2/29/00 2/29/00	2/29/00 2/29/00	2/29/00 2/29/00	2/29/00 2/29/00	2/29/00 2/29/00	2/29/00 2/29/00
Vinyl chloride	0.25	nd	nd	nd	nd	nd	nd	nd	nd
Benzene	0.05	nd	nd	nd	nd	nd	nd	nd	ba
Toluene	0.05	nd	nd	nd	nd	nd	nd	nd	nd
Ethylbenzene	0.05	nd	nd	nd	nd	nd	nd	nd	nd
Total Xylenes	0.05	nd	nd	nd	nd	0.06	nd	nđ	nd
1,1-Dichloroethene	0.05	nd	nd	nd	nd	nd	nd	nd	nd
Methylene chloride	0.05	nd	nd	nd	nd	nd	nd	nd	nd
Trans-1,2-dichlorethene	0.05	nd	nd	nd	nd	nd	nd	nd	nd
1,1-Dichloroethane	0.05	nd	nd	nd	nd	nd	nd	nd	nd
Cis-1,2-dichloroethene	0.05	nd	nd	nd	nd	nd	nd	nd	nd
Chloroform	0.05	nd	nd	nd	nd	nd	nd	nd	nd
1,1,1-Trichloroethane (TCA)	0.05	nd	nd	nd	nd	nd	nd	nd	nd
Carbontetrachloride	0.05	nd	nd	nd	nd	nd	nd	. nd	nd
1,2-Dichloroethane	0.05	nd	nd	nd	nd	nd	nd	nd	nd
Trichloroethene (TCE)	0.05	nd	nd	nd	nd	nd	nd	nd	nd
1,1,2-Trichloroethane	0.05	nd	nd	nd	nd	nd	nd	nd	nd
Tetrachloroethene (PCE)	0.05	nd	nd	nd	nd	nd	nd	nd	nd
1,1,1,2-Tetrachloroethane	0.05	nd	nd	nd	nd	nd	nd	nd	nd
1,1,2,2-Tetrachloroethane	0.05	nd	nd	nd	nd	nd	nd	nd	nd
SURROGATE RECOVERY (%)		92	95	107	97	86	90	103	123

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE (Chlorobenzene): 65%-135%

ANALYSES PERFORMED BY: Michael Dee DATA REVIEWED BY: Sherry Chilcutt

CLEANING CENTER OF REDMOND PROJECT Redmond, Washington GeoEngineers, Inc. Project No. 3352-003-00

QA/QC DATA - EPA 8021B ANALYSES

		Matrix Spike		- + L3	Matrix Spike Duplicate					
	Spiked Conc. (mg/kg)	Measured Conc. (mg/kg)	Spike Recovery (%)	Spiked Conc. (mg/kg)	Measured Conc. (mg/kg)	Spike Recovery (%)	RPD			
BENZENE	2.00	2.30	115%	2.00	2.35	118%	2 2%			
TOLUENE TRICHI OPOSTIENE (TOTE)	2.00	2.25	113%	2.00	2.30	115%	2.2%			
TRICHLOROETHENE (ICE)	2.00	2.25	113%	2.00	2.30	115%	2.2%			
SURROGATE RECOVERY (%)			99.0%			90.0%	9.5%			

QA/QC DATA - EPA 8021B ANALYSES

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	Laboratory C	le	
	Spiked Conc. (mg/kg)	Measured Conc. (mg/kg)	Spike Recovery (%)
BENZENE	5.00	5.25	105%
TOLUENE	5.00	5.10	102%
TRICHLOROETHENE (TCE)	5.00	4.20	84%
SURROGATE RECOVERY (%)			119%

CLEANING CENTER OF REDMOND PROJECT Redmond, Washington GeoEngineers, Inc. Project No. 3352-003-00

Specific Halogenated and Arom	atic Hydrocar	bons (EPA 8	021B) in Soil					Dupl
SAMPLE DESCRIPTION		B-8-8	B-9-14	B-7-16	B-11-9	B-10-0.5	B-10-5.0	B-6-20
	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
DATE SAMPLED	MDL	2/29/00	2/29/00	2/29/00	2/29/00	2/29/00	2/29/00	2/29/00
DATE ANALYZED		2/29/00	2/29/00	2/29/00	2/29/00	2/29/00	2/29/00	2/29/00
Vinvi chloride	0.25	nd	nd	nd	nd	nd	nd	nd
Benzene	0.05	nd	nd	nd	nd	nd	nd	nd
Tohuene	0.05	nd	nd	nd	nd	nd	nd	nd
Fihvlbenzene	0.05	nd	nd	nd	nd	nd	nd	nd
Total Xvienes	0.05	nd	0.10	0.30	nd	nd	nd	nd
1.1-Dichloroethene	0.05	nd	nd	nd	nd	nd	nd	nd
Methylene chloride	0.05	nd	nd	nd	nd	nd	nd	nd
Trans-1.2-dichlorethene	0.05	nd	nd	nd	nd	nd	nd	nd
1.1-Dichloroethane	0.05	nd	nd	nd	nd	nd	nd	nd
Cis-1.2-dichloroethene	0.05	nd	nd	nd	nd	nd	nd	ba
Chloroform	0.05	nd	nd	nd	nd	nd	nd	nd
1.1.1-Trichloroethane (TCA)	0.05	nd	nd	nd	nd	nd	nd	nd
Carbontetrachloride	0.05	nd	nd	nd	nd	nd	nd	nd
1.2-Dichloroethane	0.05	nd	nd	nd	nd	nd	nd	nd
Trichloroethene (TCE)	0.05	nd	nd	nd	nd	nd	nd	nd
1.1.2-Trichloroethane	0.05	nd	nd	nd	nd	nd	nd	nd
Tetrachloroethene (PCE)	0.05	0.31	0.11	nd	2.7	22	114	nd
1.1.1.2-Tetrachloroethane	0.05	nd	nd	nd	nd	nd	nd	nd
1,1,2,2-Tetrachloroethane	0.05	nd	nd	nd	nd	nd	nd	nd
SURROGATE RECOVERY (%)		113	127	79	98	99	103	103

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE (Chlorobenzene): 65%-135% "J" Indicates Approximate Value.

ANALYSES PERFORMED BY: Michael Dee DATA REVIEWED BY: Sherry Chilcutt

CLEANING CENTER OF REDMOND PROJECT Redmond, Washington GeoEngineers, Inc. Project No. 3352-003-00

Specific Halogenated and Aromatic Hydrocarbons (EPA 8021B) in Soil

SAMPLE DESCRIPTION	mg/kg	Method Blank mg/kg	B-10-9
DATE SAMPLED	MDL	2/29/00	2/29/00
DATE ANALYZED	N 25	3/2/00	3/2/00
Vinyl chloride	0.25	nd	nd
Benzene	0.05	nd	nd
Toluene	0.05	nd	nd
Ethylbenzene	0.05	nd	nd
Total Xylenes	0.05	nd	nd
1,1-Dichloroethene	0.05	nd	nd
Methylene chloride	0.05	nd	nd
Trans-1,2-dichlorethene	0.05	nd	nd
1,1-Dichloroethane	0.05	nd	nd
Cis-1,2-dichloroethene	0.05	nd	nd
Chloroform	0.05	nd	nd
1,1,1-Trichloroethane (TCA)	0.05	nd	nd
Carbontetrachloride	0.05	nd	nd
1,2-Dichloroethane	0.05	nd	nd
Trichloroethene (TCE)	0.05	nd	nd
1,1,2-Trichloroethane	0.05	nd	nd
Tetrachloroethene (PCE)	0.05	nd	4.6
1,1,1,2-Tetrachloroethane	0.05	nd	nd
1,1,2,2-Tetrachloroethane	0.05	nd	nd
SURROGATE RECOVERY (%)		92	100

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE (Chlorobenzene): 65%-135%

ANALYSES PERFORMED BY: Michael Dee DATA REVIEWED BY: Sherry Chilcutt

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800 Sleater-Kinney SE, PMB #262 Lacey, Washington 98503-1127

Mobile Environmental Laboratories Environmental Sampling Services Telephone: 360-459-4670 Fax: 360-459-3432

March 20, 2000

Jim Roth GeoEngineers, Inc. 8410 154th Ave. NE Redmond, WA 98052

Dear Mr. Roth:

Please find enclosed the analytical data report for the Nelson Properties Project in Redmond, Washington. Soil and water samples were analyzed for Oil and Grease by 413.2 and Specific Halogenated Hydrocarbons and BTEX by Method 8021B on March 6 & 7, 2000.

The results of the analyses are summarized in the attached tables. All soil values are reported on a dry weight basis. Applicable detection limits and QA/QC data are included. An invoice for this work is also enclosed.

TEG Northwest appreciates the opportunity to have provided analytical services to GeoEngineers, Inc. for this project. If you have any further questions about the data report, please give me a call. It was a pleasure working with you on this project, and we are looking forward to the next opportunity to work together.

Sincerely,

...

midiaela koron

Michael A. Korosec President

QA/QC FOR ANALYTICAL METHODS

GENERAL

The TEG Northwest Laboratory quality assurance and quality control (QA/QC) procedures are conducted following the guidelines and objectives which meet or exceed certification/-accreditation requirements of California DOHS, Washington DOE, and Oregon DEQ. The Quality Control Program is a consistent set of procedures which assures data quality through the use of appropriate blanks, replicate analyses, surrogate spikes, and matrix spikes, and with the use of reference standards that meet or exceed EPA standards.

When analyses are taking place on-site with the mobile lab, the need for Field Blanks or Travel/Trip Blanks is eliminated. If there is going to be a delay before sample preparation for analysis, the sample is stored at 4° C.

ANALYTICAL METHODS

TEG Northwest Labs use analytical methodologies which are in conformity with U. S. Environmental Protection Agency (EPA), Washington DOE, and Oregon DEQ methodologies. When necessary and appropriate due to the nature or composition of the sample, TEG may use variations of the methods which are consistent with recognized standards or variations used by the industry and government laboratories.

Purgeable Volatile Aromatics (BTEX, EPA 8021B)

A check standard is run at the beginning of the day. The check standard is run at the end of the day. Both open and close standards must be within 15% of the continuing calibration curve value. All samples are prepared with a surrogate spike, and the recovery must be between 65% and 135% unless high sample concentrations interfere with the determination of the recovery percentage. At least 1 method blank is run per day.

Purgeable Volatile Halocarbons (Chlorinated Hydrocarbons, EPA 601/8021B)

A calibration standard is run at the beginning of the day. The standard must be within 15% of the continuing calibration curve value. The standard is rerun at the end of the day. All samples are prepared with a surrogate spike, and the recovery must be between 65% and 135%. At least 1 method blank is run per day.

TPH-Heavy Fuel Hydrocarbons (EPA 418.1)

Calibration standards are run at the beginning of the day. The standards must be within 15% of the continuing calibration curve value. Check standards are run at the close of the day. A duplicate sample is run at a rate of 1 per 10 samples. At least 1 method blank is run per 20 samples analyzed.

TEG Job Number:	S00306-5
Client:	GEI
Client Job Name:	NELSON PROPERTIES
Client Job Number:	3352-003-00

Analytical Results				030600
BTEX		MTH BLK	LCS	PURGE
Matrix	Water	Water	Water	Water
Date extracted	Reporting	03/06/00	03/06/00	03/06/00
Date analyzed	Limits	03/06/00	03/06/00	03/06/00
BTEX, µg/L				
Benzene	1.0	nd	112%	nd
Toluene	1.0	nd	107%	nd
Ethylbenzene	1.0	nd		nd
Xylenes	1.0	nd		nd
Surrogate recoveries:				
Trifluorotoluene		90%	91%	99%
Bromofluorobenzene		93%	102%	115%

Data Qualifiers and Analytical Comments

nd - not detected at listed reporting limits

na - not analyzed

C - coelution with sample peaks

M - matrix interference

J - estimated value

Acceptable Recovery limits: 65% TO 135% Acceptable RPD limit: 35%

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S00306-5
GEI
NELSON PROPERTIES
3352-003-00

Analytical Results					MS	MSD	RPD
8021B ug/kg		MTH BLK	LCS	COMPOSITE	COMPOSITE	COMPOSITE	COMPOSITE
Matrix	Soil	Soil	Soil	Soil	Soil	Soil	Soil
Date extracted	Reporting	03/07/00	03/07/00	03/07/00	03/07/00	03/07/00	03/07/00
Date analyzed	Limits	03/07/00	03/07/00	03/07/00	03/07/00	03/07/00	03/07/00
Moisture, %	1			19%	19%	19%	
Chloromethane	250	nd		nd			
Bromomethane	250	nd		nd			
Vinyl chloride	250	nd		nd			
Chloroethane	250	nd		nd			
cis-1,2-Dichloroethene	250	nd		nd	22.00		
1,1-Dichloroethene	250	nd	100%	nd	89%	80%	11%
Methylene Chloride	250	nd		nd			
trans-1,2-Dichloroethene	250	nd		nd			
1,1-Dichloroethane	250	nd		nd			
Chloroform	50	nd		nd			
1.1.1-Trichloroethane	50	nd		nd			
Carbontetrachloride	50	nd		nd			
1,2-Dichloroethane	250	nd		nd			
Trichloroethene	50	nd	90%	nd	86%	80%	7%
1,2-Dichloropropane	250	nd		nd			
Bromodichloromethane	250	nd		nd			
cis-1,3-Dichloropropene	250	nd		nd			
trans-1,3-Dichloropropene	250	nd		nd			
Chlorobenzene	250	nd	96%	nd	88%	82%	7%
1,1,2-Trichloroethane	50	nd		nd			
Tetrachloroethene	50	nd		nd			
Dibromochloromethane	250	nd		nd			
Bromoform	250	nd		nd			
1,1,2,2-Tetrachloroethane	250	nd		nd			
1.1.1.2-Tetrachloroethane	250	nd		nd			
Bromobenzene	250	nd		nd	51		
1.2.3-Trichloropropane	250	nd		nd			
Dibromomethane	250	nd		nd			
m-Dichlorobenzene	50	nd		nd			
p-Dichlorobenzene	50	nd		nd	BL		
o-Dichlorobenzene	50	nd		nd	li		
Benzene	50	nd	112%	nd	106%	97%	9%
Toluene	50	nd	107%	nd	110%	93%	17%
Ethylbenzene	50	nd		. no	1		
Xylenes	50	ind		nd	[
Surrogate recoveries:							Ψ.
Bromochloromethane		69%	75%	79%	5 116%	119%	5
1 4-Dichlorobutane		77%	70%	76%	103%	106%	þ
Bromochloropropane		70%	86%	91%	108%	5 111%	6
Trifluorotoluene		90%	91%	98%	99%	103%	6
Bromofluorobenzene		93%	102%	109%	5 110%	5 111%	0

Data Qualifiers and Analytical Comments

nd - not detected at listed reporting limits

na - not analyzed

C - coelution with sample peaks

M - matrix interference

J - estimated value

Results reported on dry-weight basis Acceptable Recovery limits: 65% TO 135%

Acceptable RPD limit: 35%

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TEG Job Number: Client: Client Job Name: Client Job Number:

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S00306-5 GEI NELSON PROPERTIES 3352-003-00

Analytical Results

Matrix		MW4-22.
Matrix	Soil	So
Date extracted	Reporting	03/07/0
Date analyzed	Limits	03/07/0
Moisture, %		179
Chloromethane	250	D
Bromomethane	250	
Vinyl chloride	250	
Chloroethane	250	
cis-1,2-Dichloroethene	250	
1,1-Dichloroethene	250	
Methylene Chloride	250	
trans-1.2-Dichloroethene	250	n
1.1-Dichloroethane	250	n
Chloroform	50	n
1.1.1-Trichloroethane	50	no
Carbontetrachloride	50	nc
1 2-Dichloroethane	50	nc
Trichloroethene	250	nd
1.2-Dicbloropropage	50	nd
Brorr dichloromethane	250	no
cis-1 3-Dickloropropene	250	nd
trans-1 3-Dichloropropene	250	nd
Chlorobenzene	250	nd
1 1 2-Trichloroethana	250	nd
Tetrachloroethono	50	nd
Dibtomochloromethana	50	140
Bromoform	250	nd
1 1 2 2 Tetrachloroothana	250	nd
1 1 1 2 Tetrachloroethane	250	nd
Promobaszasa	250	nd
123 Trichlerantenan	250	nd
Dibromomethese	250	nd
	250	nd
m-Dichlorobenzene	50	nd
p-Dichlorobenzene	50	nd
o-Dichlorobenzene	50	nd
Benzene	50	nd
loluene	50	nd
Ethylbenzene	50	nd
Xylenes	50	nd
Surrogate recoveries:		
Bromochloromethane		84%
1,4-Dichlorobutane		75%
Bromochloropropane		95%
Trifluorotoluene		99%
Bromofluorobenzene		110%

Data Qualifiers and Analytical Comments nd - not detected at listed reporting limits

na - not analyzed

C - coelution with sample peaks

M - matrix interference

J - estimated value

Results reported on dry-weight basis Acceptable Recovery limits: 65% TO 135%

Acceptable RPD limit: 35%

TEG Job Number:	S00306-5
Client:	GEI
Client Job Name:	NELSON PROPERTIES
Client Job Number:	3352-003-00

Analytical Results

8021B, µg/l		MTH BLK	LCS	MW-1	MW-2	MW-3	MW-4	MW-5
Matrix	Water	Water	Water	Water	Water	Water	Water	Water
Date extracted	Reporting	03/07/00	03/07/00	03/07/00	03/07/00	03/07/00	03/07/00	03/07/00
Date analyzed	Limits	03/07/00	03/07/00	03/07/00	03/07/00	03/07/00	03/07/00	03/07/00
Chlaramathana	50	nd		ba	nd	nd	nd	ad
Bromomethane	5.0	nd		nd	nd	nd	nd	nd
Mondoblasida	5.0	nd		nd	nd	nd	nd	nd
Chloroothana	5.0	nd		nd	nd	nd	nd	nd
choroeulane	5.0	nd		nd	nd	nd	nd	nd
1 1 Dichloroothana	5.0	nd	100%	nd	nd	nd	nd	nd
Mothydene Chloride	5.0	nd	100.0	nd	nd	nd	nd	nd
trans_1 2-Dichloroathana	5.0	nd		nd	nd	nd	nd	nd
1 1-Dichlorosthane	50	nd		nd	nd	nd	nd	nd
Chloroform	1.0	nd		nd	nd	nd	nd	nd
1 1 1-Trichloroethane	1.0	nd		nd	nd	nd	nd	nd
Carbontetrachloride	1.0	nd		nd	nd	nd	nd	nd
1.2-Dichloroethane	5.0	nd		nd	nd	nd	nd	nd
Trichloroethene	10	nd	90%	nd	nd	nd	nd	nd
1.2-Dichloropropage	5.0	nd		nd	nd	nd	nd	nd
Bromodichloromethane	5.0	nd		nd	nd	nd	nd	nd
cis-1 3-Dichloropropene	5.0	nd		nd	nd	nd	nd	nd
trans-1 3-Dichloropropene	5.0	nd		nd	nd	nd	nd	nd
Chlorobenzene	5.0	nd	96%	nd	nd	nd	nd	nd
1 1 2-Trichloroethane	1.0	nd		nd	nd	nd	nd	nd
Tetrachloroethene	1.0	nd		1.6	nd	nd	50	nd
Dibromochloromethane	5.0	nd		nd	nd	nd	nd	nd
Bromoform	5.0	nd		nd	nd	nd	nd	nd
1 1 2 2-Tetrachloroethane	5.0	nd		nd	nd	nd	nd	nd
1.1.1.2-Tetrachloroethane	5.0	nd		nd	nd	nd	nd	nd
Bromobenzene	5.0	nd		nd	nd	nd	nd	nd
1.2.3-Trichloropropane	5.0	nd		nd	nd	nd	nd	nd
Dibromomethane	5.0	nd		nd	nd	nd	nd	nd
m-Dichlorobenzene	1.0	nd		nd	nd	• nd	nd	nd
p-Dichlorobenzene	1.0	nd		nd	nd	nd	nd	nd
o-Dichlorobenzene	1.0	nd		nd	nd	nd	nd	nd
Benzene	1.0	nd	112%	nd	nd	nd	nd	nd
Toluene	1.0	nd	107%	nd	nd	nd	nd	nd
Ethylbenzene	1.0	nd		nd	nd	nd	nd	nd
Xylenes	1.0	nd		nd	nd	nd	nd	nd
Surrogate recoveries:					1.5			
Bromochloromethane		69%	75%	82%	79%	75%	84%	83%
1,4-Dichlorobutane		77%	70%	74%	72%	75%	79%	76%
Bromochloropropane		70%	86%	90%	96%	97%	98%	98%
Trifluorotoluene		90%	91%	100%	99%	101%	101%	100%
Bromofluorobenzene		93%	102%	112%	112%	112%	111%	112%

Data Qualifiers and Analytical Comments

nd - not detected at listed reporting limits

na - not analyzed

C - coelution with sample peaks

M - matrix interference

J - estimated value

Acceptable Recovery limits: 65% TO 135%

Acceptable RPD limit: 35%

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S00306-5
GEI
NELSON PROPERTIES
3352-003-00

Analytical Results		MS	MSD	RPD		DUD	DDD
8021B, µg/l		MW-5	MW-5	MW-5	MMA	MAKE	RPL
Matrix	Water	Water	Water	Water	Motor	IVIV-0	MW-6
Date extracted	Reporting	03/07/00	03/07/00	03/07/00	03/07/00	02/07/00	Water
Date analyzed	Limits	03/07/00	03/07/00	03/07/00	03/07/00	03/07/00	03/07/00
					00/01/00	03/07/00	03/07/00
Chloromethane	5.0				bd		
Bromomethane	5.0				nd	na	
Vinyl chloride	5.0				nd	na	
Chloroethane	5.0				nd	na	
cis-1,2-Dichloroethene	5.0				nd	na	
1,1-Dichloroethene	5.0	88%	97%	10%	nd	na	
Methylene Chloride	5.0	in the start		10 %	nd	na	
trans-1,2-Dichloroethene	5.0				nd	na	
1,1-Dichloroethane	5.0				nd	na	
Chloroform	1.0				nd	nd	
1,1,1-Trichloroethane	1.0				nd	nd	
Carbontetrachloride	10				na	nd	
1.2-Dichloroethane	50				na	nd	
Trichloroethene	10	83%	85%	201	na	nd	
1,2-Dichloropropane	50	00 %	05.0	2.10	na	nd	
Bromodichloromethane	50				na	nd	
cis-1.3-Dichloropropene	50				na	nd	
trans-1.3-Dichloropropene	50				na	nd	
Chlorobenzene	5.0	8694	899/	201	nd	nd	
1.1.2-Trichloroethane	1.0	00 %	00%	2%	nd	nd	
Tetrachloroethene	1.0				na	nd	
Dibromochloromethane	5.0				11	12	8%
Bromoform	5.0				nd	nd	
1.1.2.2-Tetrachloroethane	5.0				nd	nd	
1.1.1.2-Tetrachloroethane	5.0				nd	nd	
Bromobenzene	5.0				nd	nd	
1 2 3-Trichloropropage	5.0				nd	nd	
Dibromomethane	5.0				nd	nd	
m-Dichlorobenzene	1.0				nd	nd	
p-Dichlorobenzene	1.0				nd	nd	
Dichlorobenzene	1.0				nd	nd	
Benzene	1.0	10004	10501		nd	nd	
Toluena	1.0	102%	105%	3%	nd	nd	
Ethylhanzana	1.0	99%	102%	3%	nd	nd	
Lulyidenzene Kulenes	1.0				nd	nd	
Aylenes	1.0	×			nd	nd	
Surrogate recoveries:							
Bromochloromethane		122%	125%		86%	116%	
,4-Dichlorobutane		105%	107%		76%	102%	
Bromochloropropane		114%	118%		97%	112%	
rifluorotoluene		103%	106%		98%	99%	
Bromofluorobenzene		113%	115%		111%	11.404	

Data Qualifiers and Analytical Comments

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na - not analyzed

C - coelution with sample peaks

M - matrix interference

J - estimated value

Acceptable Recovery limits: 65% TO 135% Acceptable RPD limit: 35%

800 Sleater-Kinney SE, PMB #262 Lacey, Washington 98503-1127

Mobile Environmental Laboratories Environmental Sampling Services Telephone: 360-459-4670 Fax: 360-459-3432

April 3, 2000

GeoEngineers

Jim Roth GeoEngineers, Inc. 8410 154th Ave. NE Redmond, WA 98052 APR 0 5 2000 Routing

Dear Mr. Roth:

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Please find enclosed the analytical data report for the Nelson Properties Project in Redmond, Washington. One water sample was analyzed for Specific Halogenated Hydrocarbons and BTEX by Method 8021B on March 27, 2000.

The results of the analyses are summarized in the attached tables. Applicable detection limits and QA/QC data are included. An invoice for this work is also enclosed.

TEG Northwest appreciates the opportunity to have provided analytical services to GeoEngineers, Inc. for this project. If you have any further questions about the data report, please give me a call. It was a pleasure working with you on this project, and we are looking forward to the next opportunity to work together.

Sincerely,

michael a Korosce

Michael A. Korosec President

QA/QC FOR ANALYTICAL METHODS

GENERAL

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Purgeable Volatile Halocarbons (Chlorinated Hydrocarbons, EPA 601/8021B)

A calibration standard is run at the beginning of the day. The standard must be within 15% of the continuing calibration curve value. The standard is rerun at the end of the day. All samples are prepared with a surrogate spike, and the recovery must be between 65% and 135%. At least 1 method blank is run per day.

TEG Job Number:	S00327-2
Client:	GEOENGINEERS
Client Job Name:	NELSON PROPERTIES
Client Job Number:	3352-003-00

Analytical Results					MS	MSD	RPD
8021B, ug/l		MTH BLK	LCS	MW-7	MW-7	MW-7	MW-7
Matrix	Water	Water	Water	Water	Water	Water	Water
Date extracted	Reporting	03/27/00	03/27/00	03/27/00	03/27/00	03/27/00	03/27/00
Date analyzed	Limits	03/27/00	03/27/00	03/27/00	03/27/00	03/27/00	03/27/00
Chloromethane	5.0	nd		nd			
Bromomethane	5.0	nd		nd			
Vinyl chloride	5.0	nd		nd			
Chloroethane	5.0	nd		nd			
cis-1,2-Dichloroethene	5.0	nd		nd			
1,1-Dichloroethene	5.0	nd	105%	nd	91%	91%	0%
Methylene Chloride	5.0	nd		nd			
trans-1,2-Dichloroethene	5.0	nd		nd			
1,1-Dichloroethane	5.0	nd		nd			
Chloroform	1.0	nd		nd			
1.1.1-Trichloroethane	1.0	nd		nd			
Carbontetrachloride	1.0	nd		nd			
1 2-Dichloroethane	5.0	nd		nd			
Trichloroethene	1.0	nd	98%	3.0	91%	91%	0%
1.2-Dichloropropane	5.0	nd		nd			
Bromodichloromethane	5.0	nd		nd			
cis-1 3-Dichloropropene	5.0	nd		nd			
trans-1.3-Dichloropropene	5.0	nd		nd			
Chlorobenzene	5.0	nd	97%	nd	91%	92%	1%
1.1.2-Trichloroethane	1.0	nd		nd			
Tetrachloroethene	1.0	nd		15			
Dibromochloromethane	5.0	nd		nd			
Bromoform	5.0	nd		nd			
1.1.2.2-Tetrachloroethane	5.0	nd		nd			
1 1 1 2-Tetrachloroethane	5.0	nd		nd			
Bromobenzene	5.0	nd		nd			
1 2 3-Trichloropropane	5.0	nd		nd			
Dibromomethane	5.0	nd		nd			
m-Dichlorobenzene	1.0	nd		nd			
n-Dichlorobenzene	1.0	nd		nd			
o-Dichlorobenzene	1.0	nd		nd			κ
Benzene	1.0	nd	118%	nd	112%	110%	2%
Toluene	1.0	nd	112%	nd	107%	105%	2%
Ethydhenzene	10	nd	10,000	nd			
Xylenes	1.0	nd		1.7			
Surrogate recoveries:		010/	000	019/	900/	044	0%
Bromochloromethane		91%	90%	91%	03%	0504	0%
1,4-Dichlorobutane		92%	99%	1044	91%	10.4%	0%
Bromochloropropane		99%	109%	104%	9070	220/	0%
Trifluorotoluene		93%	94%	91%	1070	00%	0%
Bromofluorobenzene		98%	98%	9/%	107%	90%	0%

Data Qualifiers and Analytical Comments

nd - not detected at listed reporting limits

na - not analyzed

C - coelution with sample peaks

M - matrix interference

J - estimated value

Acceptable Recovery limits: 65% TO 135%

Acceptable RPD limit: 35%

TRANSGLOBAL 500327-2 ENVIRONMENTAL GEOSCIENCES	
CLIENT: GeoBhsingers	CHAIN-OF-CUSTODY RECOR
ADDRESS: <u>8410 15454 Ave NE Ralmond WA</u> PHONE: (425) 86(-6076 FAX: (425) 861-6050 CLIENT PROJECT #: <u>2352-003-00</u> PROJECT MANAGER: J:M Roll	- DATE: 3/27/00 PAGE OF OF PROJECT NAME: Nekon Properties
$\begin{array}{ c c c c c c c c c c c c c c c c c c c$	a) a) b) c) c) c) c) c) c) c) c) c) c
8. 9. 10. 11.	
12. 13. 14. 15.	
ELINQUISHED BY (Signature) DATE/TIME RECEIVED BY (Signature) DATE/TIME 3/27/00 (230) / af Vice 3/27/07AL NUI ELINQUISHED BY (Signature) DATE/TIME PECENTER	SAMPLE RECEIPT LABORATORY NOTES:
SAMPLE DISPOSAL INSTRUCTIONS RECEIVED BY (SigNature) DATE/TIMES CHAIN OF C SEALS INTA TEG DISPOSAL @ \$2.00 each Return Pickun	CUSTODY SEALS Y/N/NA ACT? Y/N/NA GOOD COND./COLD

QA/QC FOR ANALYTICAL METHODS

GENERAL

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Purgeable Volatile Halocarbons (Chlorinated Hydrocarbons, EPA 601/8021B)

A calibration standard is run at the beginning of the day. The standard must be within 15% of the continuing calibration curve value. The standard is rerun at the end of the day. All samples are prepared with a surrogate spike, and the recovery must be between 65% and 135%. At least 1 method blank is run per day.

TEG Job Number:	S00414-1
Client:	GEI
Client Job Name:	NELSON PROPERTIES
Client Job Number:	3352-003-00

Analytical Results

00210, µg/i		MW-8
Matrix	Water	Wate
Date extracted	Reporting	04/14/00
Date analyzed	Limits	04/14/00
Chloromethane	50	nd
Bromomethane	5.0	nd
Vinyl chloride	5.0	nd
Chloroethane	5.0	nd
cis-1,2-Dichloroethene	5.0	nd
1,1-Dichloroethene	50	nd
Methylene Chloride	50	nd
trans-1,2-Dichloroethene	50	nd
1,1-Dichloroethane	5.0	nd
Chloroform	10	nd
1,1,1-Trichloroethane	1.0	nd
Carbontetrachloride	1.0	nd
1,2-Dichloroethane	50	nd
Trichloroethene	1.0	nd
1,2-Dichloropropane	50	nu
Bromodichloromethane	5.0	na
cis-1,3-Dichloropropene	5.0	na
trans-1.3-Dichloropropene	5.0 5.0 1.0	na
Chlorobenzene		na
1.1.2-Trichloroethane		na
Tetrachloroethene		
Dibromochloromethane	5.0	1.4
Bromoform	5.0	ng
1.1.2.2-Tetrachloroethane	5.0	na
1.1.1.2-Tetrachloroethane	5.0	na
Bromobenzene	5.0	· na
1.2.3-Trichloropropage	5.0	na
Dibromomethane	5.0	nd
m-Dichlorobenzene	5.0	nd
p-Dichlorobenzene	1.0	na
o-Dichlorobenzene	1.0	na
Benzene	1.0	na
Toluene	1.0	na
Ethylbenzene	1.0	na
Xvienes	1.0	nd
- The second s	1.0	nd
Surrogate recoveries:		
Bromochloromethane		114%
,4-Dichlorobutane		104%
Bromochloropropane		109%
Influorotoluene		100%
Bromofluorobenzene		106%

Data Qualifiers and Analytical Comments nd - not detected at listed reporting limits na - not analyzed C - coelution with sample peaks M - matrix interference J - estimated value Acceptable Recovery limits: 65% TO 135% Acceptable RPD limit: 35%

TRANSGLOBAL ENVIRONMENTAL GEOSCIENCES NORTHWEST, INC. GeoEngineers

800 Sleater-Kinney SE, PMB #262 Lacey, Washington 98503-1127

62		ALLS 2.1 2000
7	-	160 ~ 2000
	Routing	
	Telephone:	360-459-4670
	Fax:	360-459-3432

Mobile Environmental Laboratories Environmental Sampling Services

August 17, 2000

Jim Roth GeoEngineers, Inc. 8410 154th Ave. NE Redmond, WA 98052

Dear Mr. Roth:

Please find enclosed the analytical data report for the Nelson Properties Project in Redmond, Washington. Water samples were analyzed for Specific Halogenated Hydrocarbons and BTEX by Method 8021B on August 9, 2000.

The results of the analyses are summarized in the attached tables. Applicable detection limits and QA/QC data are included. An invoice for this work is also enclosed.

TEG Northwest appreciates the opportunity to have provided analytical services to GeoEngineers, Inc. for this project. If you have any further questions about the data report, please give me a call. It was a pleasure working with you on this project, and we are looking forward to the next opportunity to work together.

Sincerely,

michaela Karoner

Michael A. Korosec President

QA/QC FOR ANALYTICAL METHODS

GENERAL

The TEG Northwest Laboratory quality assurance and quality control (QA/QC) procedures are conducted following the guidelines and objectives which meet or exceed certification/-accreditation requirements of California DOHS, Washington DOE, and Oregon DEQ. The Quality Control Program is a consistent set of procedures which assures data quality through the use of appropriate blanks, replicate analyses, surrogate spikes, and matrix spikes, and with the use of reference standards that meet or exceed EPA standards.

When analyses are taking place on-site with the mobile lab, the need for Field Blanks or Travel/Trip Blanks is eliminated. If there is going to be a delay before sample preparation for analysis. the sample is stored at 4^o C.

ANALYTICAL METHODS

TEG Northwest Labs use analytical methodologies which are in conformity with U. S. Environmental Protection Agency (EPA), Washington DOE, and Oregon DEQ methodologies. When necessary and appropriate due to the nature or composition of the sample, TEG may use variations of the methods which are consistent with recognized standards or variations used by the industry and government laboratories.

Purgeable Volatile Halocarbons (Chlorinated Hydrocarbons, EPA 601/8021B)

A calibration standard is run at the beginning of the day. The standard must be within 15% of the continuing calibration curve value. The standard is rerun at the end of the day. All samples are prepared with a surrogate spike, and the recovery must be between 65% and 135%. At least 1 method blank is run per day.

TEG Job Number:	S00809-1
Client:	GEOENGINEERS
Client Job Name:	NELSON PROPERTIES
Client Job Number:	3352-003-00

8021B, µg/l	1.000	MTH BLK	LCS	MW-1	MW-2	MW-3	MW-4	MW-5
Matrix	Water	Water	Water	Water	Water	Water	Water	Water
	Reporting						1	
Date analyzed	Limits	08/09/00	08/09/00	08/09/00	08/09/00	08/09/00	08/09/00	08/09/00
Chloromethane	5.0	nd		nd	nd	nd	nd	nd
Bromomethane	5.0	nd		nd	nd	nd	nd	nd
Vinvi chloride	5.0	nd		nd	nd	nd	nd	nd
Chloroethane	5.0	nd		nd	nd	nd	nd	nd
cis-1.2-Dichloroethene	5.0	nd		nd	nd	nd	nd	nd
1.1-Dichloroethene	5.0	nd	124%	nd	nd	nd	nd	nd
Methviene Chloride	5.0	nd		nd	nd	nd	nd	nd
trans-1.2-Dichloroethene	5.0	nd		nd	nd	nd	nd	nd
1.1-Dichloroethane	5.0	nd		nd	nd	nd	nd	nd
Chloroform	1.0	nd		nd	nd	nd	nd	nd
1.1.1-Trichloroethane	1.0	nd		nd	nd	nd	nd	nd
Carbontetrachloride	1.0	nd		nd	nd	nd	nd	nd
1.2-Dichloroethane	5.0	nd		nd	nd	nd	nd	nd
Trichloroethene	1.0	nd	113%	nd	nď	nd	nd	nd
1.2-Dichloropropane	5.0	nd		nd	nd	nd	nd	nd
Bromodichloromethane	5.0	nd		nd	nd	nd	nd	nd
cis-1,3-Dichloropropene	5.0	nd		nd	nd	nd	nd	nd
trans-1.3-Dichloropropene	5.0	nd		nd	nd	nd	nd	nd
Chlorobenzene	5.0	nd	125%	nd	nd	nď	nd	nd
1.1.2-Trichloroethane	1.0	nd		nd	nd	nd	nd	nd
Tetrachloroethene	1.0	nd		5.4	2.9	nd	9.2	nd
Dibromochloromethane	5.0	nd		nd	nd	nd	nd	nd
Bromoform	5.0	nd		nd	'nd	nd	nd	nd
1,1,2,2-Tetrachloroethane	5.0	nd		nd	nd	nd	nd	nd
1.1.1.2-Tetrachloroethane	5.0	nd		nd	nd	nd	nd	nd
Bromobenzene	5.0	nd		nd	nd	nd	nd	nd
1,2,3-Trichloropropane	5.0	nd		nd	nd	nd	nd	nd
Dibromomethane	5.0	nd		nd	nd	nd	nd	nd
m-Dichlorobenzene	1.0	nd		nd	nd	. nd	nd	nd
p-Dichlorobenzene	1.0	nd		nd	nd	nd	nd	no
o-Dichlorobenzene	1.0	nd		nd	nd	nd	nd	na
Surrogate recoveries:								
Bromochloromethane		80%	86%	87%	68%	82%	72%	92%
1,4-Dichlorobutane		98%	94%	101%	84%	123%	92%	104%
Bromochloropropane		90%	102%	103%	68%	78%	77%	105%

Data Qualifiers and Analytical Comments

nd - not detected at listed reporting limits

na - not analyzed

C - coelution with sample peaks

M - matrix interference

J - estimated value

Acceptable Recovery limits: 65% TO 135%

Acceptable RPD limit: 35%

TEG Job Number:	S00809-1				
Client	GEOENGINEERS				
Client Job Name:	NELSON PROPERTIES				
Client Job Number:	3352-003-00				
Client Job Number:	3352-003-00				

Analysed Results		MS	MSD	RPD			
8021B, µg/l		MW-5	MW-5	MW-5	MW-6	MW-7	MW
Matrix	Water	Water	Water	Water	Water	Water	Wate
D.t.	Reporting						vvale
Date analyzed	Limits	08/09/00	08/09/00	08/09/00	08/09/00	08/09/00	08/09/00
Chloromethane	50						
Bromomethane	5.0				nd	nd	no
Vinvi chloride	5.0				nd	nd	no
Chloroethane	5.0				nd	nd	no
cis-1.2-Dichloroethene	5.0				nd	nd	nc
1,1-Dichloroethene	5.0	720/			nd	nd	nc
Methylene Chloride	5.0	1376	84%	14%	nd	nd	nd
trans-1.2-Dichloroethene	5.0				nd	nd	nd
1.1-Dichloroethane	5.0				nd	nd	nd
Chloroform	1.0				nd	nd	nd
1.1.1-Trichloroethane	1.0				nd	nd	nd
Carbontetrachloride	1.0				nd	nd	nd
1.2-Dichloroethane	1.0				nd	nd	nd
Trichloroethene	5.0	1050	1000		nd	nd	nd
1.2-Dichloropropage	1.0	123%	120%	4%	nd	nd	nd
Bromodichloromethane	5.0				nd	nd	nd
cis-1.3-Dichloropropene	5.0				nd	nd	nd
trans-1.3-Dichloropropene	5.0				nd	nd	nd
Chlorobenzene	5.0	0.404	1000		nd	nd	nd
1.1.2-Trichloroethane	5.0	94%	128%	31%	nd	nd	nd
Tetrachloroethene	1.0				nd	nd	nd
Dibromochloromethane	1.0				27	14	8.5
Bromoform	5.0				nd	nd	nd
1.1.2.2-Tetrachloroethane	5.0				nd	nd	nd
1.1.1.2-Tetrachloroethane	5.0				nd	nd	nd
Bromobenzene	5.0				nd	nd	nd
2 3-Trichloropropage	5.0				nd	nd	nd
Dibromomethane	5.0				nd	nd	nd
n-Dichlombenzene	5.0				nd	nd	nd
Dichlorobenzene	1.0				nd	nd	nd
Dichlorobenzene	1.0				nd	nd	nd
	1.0				nd	nd	nd
surrogate recoveries:							
romochloromethane		77%	88%		88%	91%	81%
,4-Dichlorobutane		107%	115%		111%	119%	87%
romochloropropane		89%	106%		154%	156%	1180/

Data Qualifiers and Analytical Comments

nd - not detected at listed reporting limits

na - not analyzed

C - coelution with sample peaks

M - matrix interference

J - estimated value

Acceptable Recovery limits: 65% TO 135% Acceptable RPD limit: 35%

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Mw-J		1510	W	x									X							
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MV.5		1010	w	y					111.1				X							
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Mw-7		1416	W	ч									X							
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TABLE 1

SUMMARY OF GROUND WATER ELEVATIONS AND ORGANIC VAPOR CONCENTRATIONS IN MONITORING WELLS¹ CLEANING CENTER OF REDMOND

Well Number	Date Measured	Depth to Ground Water (feet)	Ground Water Elevation ² (feet)	Organic Vapor ³ Concentrations (ppm)
MW-1	04/14/00	10.55	89.53	0.6
	08/08/00	12.33	87.75	
MW-2	04/14/00	11.74	89.02	0.3
	08/08/00	13.34	87.42	
MW-3	04/14/00	9.39	89.02	0.8
	08/08/00	10.99	87.42	
MW-4	04/14/00	9.26	89.56	2.2
	08/08/00	11.04	87.78	- <u>-</u>
MW-5	04/14/00	11.37	89.74	1.7
	08/08/00	13.28	87.83	
MW-6	04/14/00	9.48	89.04	0.6
	08/08/00	10.90	87.62	1 <u>1</u>
MW-7	04/14/00	9.45	88.84	
	08/08/00	10.97	87.32	
MW-8	04/14/00	11.08	88.03	1.1.1.1
	08/08/00	12.33	86.78	

REDMOND, WASHINGTON

Notes:

¹Approximate well locations are shown in Figures 3 through 6.

²Elevations referenced to a temporary benchmark on the southwest corner of a concrete vault located at the approximate location shown in Figures 4 and 5. The benchmark has an assumed elevation of 100.00 feet. ³Organic vapor measurements made on 03/06/00 using a photo-ionization detector (PID).

- = not measured

ppm = parts per million

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TABLE 2

SUMMARY OF SOIL CHEMICAL ANALYTICAL DATA¹

CLEANING CENTER OF REDMOND REDMOND, WASHINGTON

Sample Identification ¹	Sample Depth (feet)	Date Sampled	Tetrachloroethene ^{2,3} (PCE) (mg/kg)	
B-1-10	10.0	02/29/00	<0.05	
B-2-12.5	12.5	02/29/00	<0.05	
B-3-15	15.0	02/29/00	<0.05	
B-4-8.5	8.5	02/29/00	<0.05	
B-5-8.5	8.5	02/29/00	<0.05	
B-6-20	20.0	02/29/00	<0.05	
B-7-16	16.0	02/29/00	<0.05 0.31	
B-8-8	8.0	02/29/00		
B-9-14	14.0	02/29/00	0.11	
B-10-0.5	0.5	02/29/00	22	
B-10-5.0	5.0	02/29/00	114	
B-10-9.0	9.0	02/29/00	4.6	
B-11-9	9.0	02/29/00	2.7	
MW-4-22.5	22.5	03/06/00	0.140	
A Method A Cleanup Level			0.5	

Notes:

¹Chemical analyses of samples were conducted by Transglobal Environmental Geosciences Northwest located in Bellevue, WA, ²Only compounds exceeding laboratory detection limits are listed. See laboratory reports for a complete list of analytes and detection limits.

³Analyzed using EPA Method 8021B

mg/kg = milligrams per kilogram MTCA = Model Toxics Control Act

Shaded values indicate concentrations greater than MTCA Method A cleanup levels.

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TABLE 3 (Page 1 of 2)

SUMMARY OF GROUND WATER CHEMICAL ANALYTICAL DATA¹

CLEANING CENTER OF REDMOND

REDMOND, WASHINGTON

Sample Location ¹	Date Sampled	Dissolved Oxygen ² (mg/l)	Toluene ³ (µg/l)	Xylenes ³ (µg/l)	Tetrachloroethene ^{3,4} (PCE) (µg/l)	Trichloroethene ^{3,4} (TCE) (ug/l)
B-1	02/29/00		2.9	3.4	<1.0	<1.0
B-2	02/29/00		2.3	<1.0	7.2	<1.0
B-3	02/29/00		2.5	<1.0	5.6	10
B-4	02/29/00	-	2.5	<1.0	4.4	<1.0
B-5	02/29/00		2.5	1.4	47	16
B-6	02/29/00		9.6	5.2	25	57
B-7	02/29/00		3.6	2.5	58	1.0
B-8	02/29/00		3.9	2.9	3.0	
B-9	02/29/00		4.6	3.6	13	<1.0
B-10	02/29/00		<50 ⁵	<50 ⁵	2 000	<50
B-11	02/29/00		4.6	1.9	530	87
MW-1	03/06/00	10.79	<1.0	<1.0	16	<1.0
	08/08/00	0.90	-	-	54	<1.0
MW-2	03/06/00	6.68	<1.0	<1.0	<1.0	<1.0
	08/08/00	1.32	-	-	2.9	<1.0
MW-3	03/06/00	9.80	<1.0	<1.0	<1.0	<1.0
	08/08/00	0.57	_		<1.0	<1.0
MW-4	03/06/00	1.26	<1.0	<1.0	50	<1.0
	08/08/00	0.69		_	92	<1.0
MW-5	03/06/00	6.59	<1.0	<1.0	<1.0	<1.0
	08/08/00	0.75	_		<1.0	<1.0
MW-6	03/06/00	1.04	<1.0	<1.0	11	<1.0
	08/08/00	0.42	_		27	<1.0
MW-7	03/28/00	1.35	1.7	1.7	15	3.0
	08/08/00	0.74	-	_	14	<1.0
MW-8	04/14/00	0.44	<1.0	<1.0	7.4	<1.0
	08/08/00	0.39	-	-	8.5	<1.0
TCA Method A	Cleanup Level	N/A	40.0	20.0	5.0	5.0

Notes appear on page 2 of 2.

TABLE 3 (Page 2 of 2)

Notes:

¹Chemical analyses of samples were conducted by Transglobal Environmental Geosciences Northwest located in Bellevue, Washington

²Measured in field with YSI 55 dissolved oxygen meter or Horiba U-10 water checker.

³Analyzed using EPA Method 8021B.

⁴Only compounds exceeding laboratory detection limits are listed. See laboratory reports for a complete list of analytes and detection limits.

⁵Detection limit is greater than MTCA Method A cleanup level.

µg/l = micrograms per liter

mg/l = milligrams per liter

— = not measured or analyzed

MTCA = Model Toxics Control Act

Shaded values indicate concentrations greater than MTCA Method A cleanup levels.

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9/28/00

ATTACHMENT D SITE-SPECIFIC TERRESTRIAL ECOLOGICAL EVALUATION

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION Former Cleaning Center of Redmond 15796 Redmond Way Redmond, Washington

Farallon PN: 650-001



975 5th Avenue Northwest, Issaquah, Washington 98027 Tel: (425) 295-0800 Fax: (425) 295-0850 www.farallonconsulting.com

March 1, 2011

Mr. Michael Kuntz Toxics Cleanup Program Washington State Department of Ecology PO Box 47600 Olympia, Washington 98504

RE: REQUESTED INFORMATION CLEANING CENTER OF REDMOND SITE 15796 REDMOND WAY, REDMOND, WASHINGTON VCP IDENTIFICATION NO. NW1324 FARALLON PN: 650-001

Dear Mr. Kuntz:

Farallon Consulting, L.L.C. (Farallon) has prepared this letter to transmit the information requested in your email dated January 31, 2011 that is necessary for Washington State Department of Ecology (Ecology) to issue a property-specific No Further Action determination for the release of the dry cleaning solvent tetrachloroethene (PCE) at the Cleaning Center of Redmond at 15796 Redmond Way in Redmond, Washington. The Cleaning Center of Redmond site is enrolled in the Ecology Voluntary Cleanup Program (VCP) and has been assigned VCP Identification No. NW1324. The requested information includes the following:

- 1) The tax parcel number for the Cleaning Center of Redmond facility;
- 2) The legal description for the subject property of the VCP Application;
- 3) A notice from the Ecology Environmental Information Management Data Coordinator that all data has been electronically submitted; and
- 4) A Terrestrial Ecological Evaluation for the site as described in Section 7493 of Chapter 173-340 of the Washington Administrative Code (WAC 173-340-7493).

The Cleaning Center of Redmond is located on King County Assessor Tax Parcel No. 719890-0080. The legal description for this property is as follows:

LOT 1 OF CITY OF REDMOND LOT LINE REVISION LLR-90-01, AS RECORDED IN VOLUME 79 OF SURVEYS, AT PAGES 161 AND 161A, RECORDED UNDER RECORDING NO. 9104039002, RECORDS OF KING COUNTY, WASHINGTON.

Farallon has submitted all data collected after October 2005 at the Cleaning Center of Redmond Site to the Ecology Environmental Information Management Data Coordinator. The Data Coordinator confirmed receipt and acceptance of the data on March 1, 2011.



Washington State Department of Ecology March 1, 2011 Page 2

A completed Terrestrial Ecological Evaluation Form is attached to this letter. The release of PCE to soil and groundwater was cleaned up using a soil vapor extraction system as described in the Site Closure Report, Cleaning Center of Redmond, 15796 Redmond Way, Redmond, Washington dated September 21, 2007, prepared by Farallon. As documented in this report, concentrations of PCE were reduced to below the Model Toxics Control Act Cleanup Regulation (MTCA) Method A cleanup levels in soil and groundwater. Concentrations of PCE in confirmation soil samples collected at the former source area beneath the Cleaning Center of Redmond were less than 0.022 milligrams per kilogram. The area where the release of PCE to soil occurred is covered by a building floor slab and asphalt-surfaced loading dock area, which are not accessible to ecological receptors. As listed on the attached Terrestrial Ecological Evaluation Form under Section C: Site-Specific Evaluation, Item 1, this is not problematic because the release of PCE to soil was addressed by the cleanup action conducted to protect human health. In addition, PCE is not a chemical listed in MTCA Table 749-3 for protection of terrestrial plants and animals, nor under the references cited in footnotes c or d of this table. Therefore, the residual concentrations of PCE in soil at the former source area beneath the building floor slab that are below MTCA Method A cleanup levels for unrestricted land uses are considered protective of terrestrial ecological receptors.

Farallon trusts that this letter provides the information requested in your email dated January 31, 2011. Farallon looks forward to receipt of the Opinion Letter from Ecology providing a property-specific No Further Action determination. Other actions to assess potential residual concentrations of PCE in groundwater in the southeast portion of the Redmond Center property will be addressed by the City of Redmond and any other potentially liable persons. Please contact the undersigned at (425) 295-0800 if you have questions or need additional information.

Sincerely,

Farallon Consulting, L.L.C.

Oufford T. Schmitt

Clifford T. Schmitt, L.G., L.H.G. Principal

Attachment: Terrestrial Ecological Evaluation Form

cc: Mr. Thomas L. Markl, CEO, Nelson Real Estate Management, LLC

CTS:bw

G \Projects\650 Nelson Properties\650001 Cleaning Cntr Redmond\Correspondence\Ecology Req for Information\Ecology Req for Info Response Itr docx



Voluntary Cleanup Program

Washington State Department of Ecology Toxics Cleanup Program

TERRESTRIAL ECOLOGICAL EVALUATION FORM

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

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

When requesting a written opinion under the Voluntary Cleanup Program (VCP), you must complete this form and submit it to the Department of Ecology (Ecology). The form documents the type and results of your evaluation. You still need to submit your evaluation as part of your cleanup plan or report.

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

Step 1: IDENTIFY HAZARDOUS WASTE SITE

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

Facility/Site Name: Cleaning Center of Redmond

Facility/Site Address: 15796 Redmond Way, Redmond, Washington 98052

Facility/Site No:

VCP Project No.: NW1324

Title: Principal

Step 2: IDENTIFY EVALUATOR

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

Name: Gerald Portele

Organization: Farallon Consulting, L.L.C.

Mailing address: 975 5th Avenue Northwest

City: Issaquah		State: WA	Zip code: 98027
Phone: 425-295-0800	Fax: 425-295-0850	E-mai	ill: jportele@farallonconsulting.com

A.	A. Exclusion from further evaluation.					
1.	1. Does the Site qualify for an exclusion from further evaluation?					
	Yes If you answered "YES," then answer Question 2.					
	□ N Unkr	No or If you answered "NO" or "UKNOWN," then skip to Step 3B of this form.				
2.	What is th	e basis for the exclusion? Check all that apply. Then skip to Step 4 of this form.				
	Point of Co	compliance: WAC 173-340-7491(1)(a)				
		All soil contamination is, or will be,* at least 15 feet below the surface.				
		All soil contamination is, or will be,* at least 6 feet below the surface (or alternative depth if approved by Ecology), and institutional controls are used to manage remaining contamination.				
	Barriers to	Exposure: WAC 173-340-7491(1)(b)				
		All contaminated soil, is or will be,* covered by physical barriers (such as buildings or paved roads) that prevent exposure to plants and wildlife, and institutional controls are used to manage remaining contamination.				
	Undevelop	ped Land: WAC 173-340-7491(1)(c)				
		There is less than 0.25 acres of contiguous [#] undeveloped [±] land on or within 500 feet of any area of the Site and any of the following chemicals is present: chlorinated dioxins or furans, PCB mixtures, DDT, DDE, DDD, aldrin, chlordane, dieldrin, endosulfan, endrin, heptachlor, heptachlor epoxide, benzene hexachloride, toxaphene, hexachlorobenzene, pentachlorophenol, or pentachlorobenzene.				
		For sites not containing any of the chemicals mentioned above, there is less than 1.5 acres of contiguous [#] undeveloped [±] land on or within 500 feet of any area of the Site.				
	Backgrour	nd Concentrations: WAC 173-340-7491(1)(d)				
		Concentrations of hazardous substances in soil do not exceed natural background levels as described in WAC 173-340-200 and 173-340-709.				
* / ac	An exclusion ceptable to E	based on future land use must have a completion date for future development that is cology.				
рге	'Undevelope event wildlife	d land" is land that is not covered by building, roads, paved areas, or other barriers that would from feeding on plants, earthworms, insects, or other food in or on the soil.				
# " hig	'Contiguous" hways, exte	undeveloped land is an area of undeveloped land that is not divided into smaller areas of nsive paving, or similar structures that are likely to reduce the potential use of the overall area				

B. Simplified evaluation.				
1.	Does the Site qualify for a simplified evaluation?			
		s If you answered "YES," then answer Question 2 below.		
	🔲 l Unki	or If you answered " NO " or " UNKNOWN, " then skip to Step 3C of this form.		
2.	Did you conduct a simplified evaluation?			
		s If you answered "YES," then answer Question 3 below.		
		If you answered "NO," then skip to Step 3C of this form.		
3.	Was further evaluation necessary?			
		s If you answered "YES," then answer Question 4 below.		
		If you answered "NO," then answer Question 5 below.		
4.	If further	aluation was necessary, what did you do?		
		lsed the concentrations listed in Table 749-2 as cleanup levels. If so, then skip to Step 4 of this form.		
		Conducted a site-specific evaluation. If so, then skip to Step 3C of this form.		
5.	If no furth to Step 4 d	evaluation was necessary, what was the reason? Check all that apply. Then sk his form.		
	Exposure	alysis: WAC 173-340-7492(2)(a)		
		ea of soil contamination at the Site is not more than 350 square feet.		
	Current or planned land use makes wildlife exposure unlikely. Used Table 749-1.			
	Pathway A	alysis: WAC 173-340-7492(2)(b)		
	No potential exposure pathways from soil contamination to ecological receptors.			
	Contamina	Analysis: WAC 173-340-7492(2)(c)		
		No contaminant listed in Table 749-2 is, or will be, present in the upper 15 feet at concentrations that exceed the values listed in Table 749-2.		
		No contaminant listed in Table 749-2 is, or will be, present in the upper 6 feet alternative depth if approved by Ecology) at concentrations that exceed the valisted in Table 749-2, and institutional controls are used to manage remaining contamination.		
		No contaminant listed in Table 749-2 is, or will be, present in the upper 15 feet at concentrations likely to be toxic or have the potential to bioaccumulate as determine using Ecology-approved bioassays.		
		No contaminant listed in Table 749-2 is, or will be, present in the upper 6 feet (or alternative depth if approved by Ecology) at concentrations likely to be toxic or have the potential to bioaccumulate as determined using Ecology-approved bioassays, an institutional controls are used to manage remaining contamination.		

1.	Was there a problem? See WAC 173-340-7493(2).				
	No If you below:		inswered "NO," then identify the reason here and then skip to Question 5		
			No issues were identified during the problem formulation step.		
		\boxtimes	While issues were identified, those issues were addressed by the cleanup actions for protecting human health.		
2.	What did y	ou do to resolv	ve the problem? See WAC 173-340-7493(3).		
Used the concentrations listed in Table 7 <i>Question 5</i> below.		Used the conc <i>Question 5</i> be	entrations listed in Table 749-3 as cleanup levels. <i>If so, then skip to elow.</i>		
	Used one or more of the methods listed in WAC 173-340-7493(3) to evaluate an address the identified problem. <i>If so, then answer Questions 3 and 4 below.</i>				
3.	If you conducted further site-specific evaluations, what methods did you use? Check all that apply. See WAC 173-340-7493(3).				
		Literature surveys.			
		Soil bioassays.			
		Wildlife exposure model.			
		Biomarkers.			
		Site-specific field studies.			
		Weight of evidence.			
		Other methods approved by Ecology. If so, please specify:			
4.	What was	the result of the	ose evaluations?		
		Confirmed the	re was no problem.		
		Confirmed there was a problem and established site-specific cleanup levels.			
5.	Have you problem r	already obtaine esolution steps	ed Ecology's approval of both your problem formulation and ?		
	X Y	es If so, plea	se identify the Ecology staff who approved those steps: Michael Kuntz		
		lo			

Step 4: SUBMITTAL

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



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

ATTACHMENT E EIM SUBMITTAL ACKNOWLEDGMENTS

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION Former Cleaning Center of Redmond 15796 Redmond Way Redmond, Washington

Farallon PN: 650-001

Cliff,

I have received the EIM submittal,, Terrestrial Ecological Evaluation and the legal description. The EIM submittal is acceptable. It was my understanding that a summary sheet describing the Evaluation would be attached to the form. I will accept the summary in the letter however I will attach a copy of the summary to the form and make note of it on the form. The legal description is not acceptable. A copy of the recorded survey is required. If you have questions please do not hesitate to contact me by the means provided below.

Sincerely,

Mike

Michael Kuntz Toxics Cleanup Program Department of Ecology POB 47600 Olympia, WA 98504 (360) 407-7239 <u>Mkun461@ecy.wa.gov</u> *Wear good boots and carry plenty of water.*

From: Durkee, Jenna (ECY) To: Brani Jurista Subject: FW: VCNW2693-Nelgroup Properties, LLC, Redmond, WA Date: Thursday, May 29, 2014 2:14:05 PM

Hi Brani,

Just wanted to include you on this as well. The EIM data that has been submitted for this site is loaded and will be available in EIM tomorrow. Thank you, Jenna Durkee Environmental Specialist TCP EIM Data Coordinator Washington Department of Ecology (509) 454-7865 Jenna.Durkee@ecy.wa.gov From: Durkee, Jenna (ECY) Sent: Thursday, May 29, 2014 2:00 PM To: 'Lyndsey Needham' Ci: Yuntz, Michael G. (ECY)

Subject: VCNW2693-Nelgroup Properties, LLC, Redmond, WA

All submitted data has been successfully loaded into EIM for the following study. The Ecology Project Manager should verify the results and locations, and that the study in EIM contains the correct number of results. Here is review guidance for the Ecology Project Manager:

http://aww.ecology/programs/tcp/Site_Manager_Resource_Ctr/Policy_Resources/Policy_Resources_main.html

FS ID:281

Study ID: VCNW2693

Study Name: Nelgroup Properties, LLC, Redmond, WA

Locations: 2

Results: 46

You can view the data **tomorrow** by using the following link and searching by the above Study ID: <u>http://ecyeim/search/Eim/EIMSearch.aspx?SearchType=AllEIM&State=newsearch&Section=all</u> Jenna Durkee Environmental Specialist TCP EIM Data Coordinator

TCP EIM Data Coordinator Washington Department of Ecology (509) 454-7865 Jenna.Durkee@ecy.wa.gov