State of Washington
POLLUTION LIABILITY INSURANCE AGENCY
300 Desmond Drive SE • PO Box 40930 • Olympia, Washington 98504-0930
(360) 407-0520 • (800) 822-3905 • FAX (360) 407-0509
www.plia.wa.gov

February 28, 2020

Mr. Nick Gerkin
Aerotech Environmental Consulting Inc.
13925 Interurban Avenue South
Seattle, WA 98168

Re: No Further Action at the Following Site:

- **Name:** Mr. Sudsy Car Wash
- **Property Address:** 209 Central Avenue South, Kent, WA 98032
- **Facility/Site No.:** 58168724
- **PTAP Project No.:** PNW149

Dear Mr. Gerkin:

The Washington State Pollution Liability Insurance Agency (PLIA) received your request for an opinion on your independent cleanup of the Mr. Sudsy Car Wash (Site). This letter provides our opinion. We are providing this opinion under the authority of Chapter 70.149 RCW and 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. PLIA 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.

Description of the Site

This opinion applies only to the Property and the Site located at 209 Central Avenue South, Kent, WA 98032 and comprises one King County tax parcel 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 Properties and Tax Parcels within the Site:

The Property located at 209 Central Avenue South, Kent, WA 98032 includes the following tax parcel in Snohomish County and will be addressed by your cleanup (Fig. 1):

- Tax Parcel: 917960-0740

2. Description of the Site:

The parcel(s) makes up the Site and is defined by the nature and extent of contamination associated with the following release (Fig. 2, Fig. 3, Fig. 4, and Fig. 5):

- Total petroleum hydrocarbons in the diesel/oil/gasoline range (TPH-d, TPH-o & TPH-g) and associated volatile organic compounds like benzene, ethylbenzene, toluene and xylenes and potentially naphthalene into the soil, groundwater and air/vapor.

Enclosure A includes a diagram of the Site that illustrates the location of the Property within the Site.

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

Please note, a parcel of real property can be affected by multiple sites. At this time, we have no information that this Property (parcel) was affected by other sites.

Enclosure A includes diagram of the Site, as currently known to PLIA.

Basis for the Opinion

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

1. Remedial Investigation Report Revision 01, Mr. Sudsy Car Wash, Kent, Washington by Aerotech Environmental Consulting Inc. September 17, 2019.
2. Updated Proposed Soil Boring Location Map, Mr. Sudsy Car Wash, Kent, Washington by Aerotech Environmental Consulting Inc. Received July 11, 2019.
3. Proposed Work Plan, Mr. Sudsy Car Wash, Kent, Washington by Aerotech Environmental Consulting Inc. May 31, 2019.
4. Groundwater Treatment Report PersulfOx® Injection. Mr. Sudsy Car Wash, Kent, Washington by Aerotech Environmental Consulting Inc.

June 6, 2017.

5. Groundwater Monitoring Report: 11th Quarter. Mr. Sudsy Car Wash, Kent, Washington by Aerotech Environmental Consulting Inc. November 17, 2017.
6. Groundwater Monitoring, Recovery Well Decommissioning, and Remedial Action Pilot Test Report., Mr. Sudsy Car Wash, Kent, WA by Adapt Engineering, Inc. July 20, 2009.
7. Summary Report – Site Check During Underground Storage Tank Installation., Mr. Sudsy Car Wash, Kent, WA by Applied Geotechnology Inc. August 31, 1992.

Documents submitted to PLIA are subject to the Public Records Act (Chapter 42.56 RCW). To make a request for public records, please email pliamail@plia.wa.gov.

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

Analysis of the Cleanup

1. Cleanup of the Site

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

a. Characterization of the Site.

PLIA 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.

The Property is currently operated as a 76-branded gasoline station and a Mr. Sudsy Car Wash. The Property is accessed from East Gowe Street and Central Ave. South.

The property has been operated as a gasoline station and carwash since 1971. The gasoline station currently contains three underground storage tanks (USTs)—one 8,000-gallon and two 12,000 gallon USTs and two canopy covered fuel islands (Fig. 2). Both 12,000 gallon steel USTs were reportedly installed in 1972 and upgraded in 1992 with a liner and fiberglass conveyance piping. The 8,000 gallon steel UST was installed in 1992.

The Property is located along the eastern edge of the city of Kent downtown commercial area. Surrounding properties are reportedly retail, commercial and light industrial. The property is relatively flat and slopes slightly towards the northwest. Investigations reportedly showed the property to be

underlain by approximately 2' to 4' of fill material consisting of moist brown gravelly sand with concrete and asphalt fragments. Soils underneath the fill consisted of moist brown, sandy gravel/gravelly sand with silt to approximately 8' below ground surface (bgs) and fine grained to medium sand from 8' bgs to the maximum explored depth of approximately 16' bgs.

Groundwater reportedly occurs in the shallow saturated zone beneath the Site comprised of fine to coarse grained sand with very little silt. The depth to the water table ranges between approximately 4' to 10' bgs. The groundwater flow direction reportedly varies from west to northwest towards Green River (Fig 6).

Petroleum contaminated soil (PCS) and groundwater (PCGW) detected at this Site is associated with the historical use of the Site as a commercial fueling station. MTCA defines a Site as where contamination has come to be located. For this Site, it includes the historical PCS of TPH-g above 30 mg/kg and benzene greater than 0.03 mg/kg in the vicinity of the former excavation pit and the current UST nest (Fig. 3 and Fig. 5).

PCGW was detected post excavation at the Site within and outside the excavation pit limits as depicted by the following sampling locations: GRW, MW-5, and MW-6 (Fig. 2 and Fig. 4).

Conceptual Site Model (CSM)

i. Soil (Direct Contact):

Soils encountered during the subsurface investigation included fill consisting of moist brown gravelly sand with concrete and asphalt fragments to approximately 2' to 4' bgs underlain by moist brown, sandy gravel/gravelly sand with silt to approximately 8' bgs, underlain by fine grained to medium sand from 8' bgs to the maximum explored depth of approximately 16' bgs. The depth and extent of the historical PCS (TPH-G and benzene) at the Site **above** MTCA Method A cleanup levels (CULs) were detected at Test Pit No.3, Excavation, South Wall, Excavation, North Wall, P1, and P-5 between 10' and 15' bgs in the vicinity of an interim action excavation near the UST nest (Fig. 3 and Fig. 5). PCS detected at the Site **above** the MTCA Method A unrestricted land-use CULs that are located between 8' to 15' are within the depths (0 to 15' bgs) that humans (utility workers and property developers) may come into contact.

Result: The direct contact exposure pathway was a concern at this Site.

i. **Groundwater:** Depth to groundwater at the Site ranges from 4.10' to 9.75' bgs. The regional groundwater discharge reportedly appears to be towards Green River. Local groundwater flow direction generally varies between northerly and northwesterly.

PCGW was detected at the Site within and outside the interim action excavation pit limits as depicted by the following sampling locations: GRW, MW-5, and MW-6 (Fig. 2 and Fig. 4).

Result: The soil to groundwater leaching exposure pathway was a concern at this Site.

ii. **Vapor Exposure:** The Property is currently operated as a car wash and gasoline station with a small service booth. A restaurant is located to the northwest of the Site. The restaurant may have been within the 30' lateral inclusion zone from the edge of a contaminant source (PCS) above the Method A cleanup level for unrestricted land use. The lateral inclusion zone or vertical separation distances are defined as the areas surrounding a contaminant source through which vapor phase contamination might travel and intrude into buildings (ITRC 2018, EPA 2018, Ecology Draft VI Guidance update 2018). Data show that residual PCS has been remediated below the Method A unrestricted land use cleanup levels.

Result: The vapor exposure pathway was a concern at this Site.

iii. **Surface water:** Depth to the shallow groundwater at the Site ranges between 4.10' to 9.75' bgs. The regional groundwater discharge appears to be towards Green River which is located approximately 4,000' from the site. Mill Creek is located approximately 1,200' northeast of the site.

Result: The surface water exposure pathway was not a concern at this Site.

b. **Establishment of cleanup standards.**

PLIA has determined the CULs and points of compliance (POC) you established for the Site meet the substantive requirements of MTCA.

i. **CULs**

Table 1. The COCs and CULs are:

Contaminants of Concern (COCs)	Soil Cleanup Level mg/kg (**Method A**) Un-restricted Land Use	Groundwater Cleanup Level ug/l (Method A)	Sub-slab/soil gas Screening Levels ug/m^3 (Method B SL)	Indoor/Air Cleanup Levels ug/m^3 (Method B CUL)
TPH-d/o	2000	500	-	-
TPH-g	30*/100	800*/1000	-	-
Benzene (**carcinogen)**	0.03	5	10.7	0.321
Toluene	7	1000	76,000	2290
Ethylbenzene	6	700	15,200	457
Xylenes, -m, -o	9	1000	1,520	45.7
Naphthalene (**carcinogen**) (does not include 1-methyl and 2-methyl naphthalene)	5	160	2.45	0.0735
Total Petroleum Hydrocarbon	-	-	4,700**	140
APH [EC5-8 Aliphatics]	-	-	90,000	2,700
APH [EC9-12 Aliphatics]	-	-	4,700	140
APH [EC9-10 Aromatics]	-	-	6,000	180

*When benzene is present
** Based on the current attenuation factor of 0.03.

ii. POC.

The proposed POC are:

Soil-Direct Contact: For CULs based on human exposure via direct contact, the standard POC is: "*…throughout the Site from ground surface to 15' below the ground surface.*" This is in compliance with WAC 173-340-740(6)(d) and represents a reasonable estimate of the depth of soil that could be excavated and distributed at the soil surface as a result of Site development activities.

Groundwater: For groundwater, the standard POC as established under WAC 173-340-720(8) 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.*"

Vapor: CULs need to be attained in the ambient air throughout the Site, including indoor air (WAC 173-340-750[6]).

Surface Water: For properties abutting surface water, WAC 173-340-720(8)(i), the groundwater cleanup level is based on protection of surface water beneficial uses and a CPOC is set as close as technically possible to the point or points where groundwater flows into the surface water.

c. Past Remedial Actions at the Site.

PLIA has determined past remedial actions conducted at the Site **have been sufficient** to meet cleanup standards (CULs at the POC).

July 1992: A site check was performed by Applied Geotechnology Inc. during the installation of a new 8,000 gasoline UST. Two existing steel 12,000 gallon gasoline USTs were relined with fiberglass and the existing fuel supply lines were converted from steel to fiberglass. PCS was observed during the excavation for the new 8,000 gallon UST and 250 cubic yards of PCS were removed. Three test pits were excavated. Soil samples from the tank excavation and one of the test pits (TP3) contained TPH-g, benzene, toluene, ethylbenzene, and xylenes above their respective MTCA Method A cleanup levels. Petroleum impacts to groundwater were suspected due to an observed sheen and hydrocarbon odor in the tank excavation pit water, and due to the proximity of PCS to groundwater. A groundwater recovery sump and groundwater reintroduction gallery were installed. Applied Geotechnology Inc. reported that the sump and gallery would be utilized in a groundwater recovery and treatment system if deemed necessary after groundwater laboratory analysis. A soil vapor extraction system was installed and plans were made to begin system operation in September 1992.

Late 1992 through October 1995: AGI Technologies (formerly Applied Geotechnology, Inc.) operated a vapor extraction system and a groundwater recovery and treatment system. The vapor extraction system was operated until recovered vapors declined to less than 0.5 pounds per day. Groundwater recovery and treatment reportedly continued until organic vapors present in groundwater declined from greater than 1,000 ppm to approximately 5 to 10 ppm. Approximately 100,000 gallons of groundwater were recovered and treated.

October 2002: LSI Adapt performed a Phase I Environmental Site Assessment and sampled the groundwater recovery sump on October 31, 2002. TPH-g and Benzene were detected above MTCA Method A CUL in groundwater.

October 2002: LSI Adapt completed a Limited Phase II Environmental Site Assessment in an attempt to further characterize petroleum contamination at the Site. The assessment included laboratory analysis of soil and groundwater samples collected during the advancement of eight direct push borings on the Property. Benzene was detected in soil above MTCA Method A cleanup level in borings P1 and P5. TPH-g and benzene above MTCA Method A CUL were detected in groundwater grab samples collected from borings P1 and P5.

February 12, 2003: LSI Adapt installed four monitoring wells on the Property (MW-1, MW-2, MW-3, and MW-4). At each well location, a hollow stem auger was advanced to approximately 14' to 15' bgs and 2" monitoring wells were installed in each boring. Groundwater elevation measurements taken from the wells reportedly indicated that groundwater was flowing towards the northwest. Water quality sampling of these wells began on February 14, 2003.

March 2004: LSI Adapt oversaw the installation of two additional monitoring wells (MW-5 and MW-6) in order to further delineate PCGW. Analytical results from the first groundwater sampling event at both wells on September 29, 2004 indicated that TPH-g and benzene exceeded MTCA Method A CUL in MW-5 and benzene exceeded MTCA Method A CUL in MW-6. A summary of all monitoring well sampling results and dates is included as Table 2A.

August 25 and 26, 2004: LSI Adapt oversaw the injection of approximately 1,100 pounds of oxygen release compound (ORC). A total of 20 borings were advanced to approximately 20' bgs. ORC was injected into soil and groundwater from approximately 5' to 20' bgs in each boring.

May 12, 2009: LSI Adapt performed a small scale remedial action pilot test of a chemical oxidation product (RegenOx). Approximately 630 pounds of RegenOx was injected into six injection locations surrounding the location of monitoring well MW-5 at a depth interval of 5' to 10' bgs. LSI Adapt's analysis of the groundwater quality laboratory data from before and after the pilot test indicated that the RegenOx injection had limited success in reducing contaminant concentrations in the vicinity of MW-5.

July 13, 2009: LSI Adapt oversaw the decommissioning of the groundwater recovery sump. All pumping equipment was removed and the sump/well and all remaining piping was filled with a combination of high pressure applied grout and hydrated bentonite chips. The sump vault was filled with concrete.

September 9 and June 6, 2016: Aerotech Environmental Consulting, Inc. (Aerotech) injected 771.4 pounds of chemical oxidation product (PerSulfox) into monitoring well MW-5 for *in-situ* treatment of petroleum impacted soil and groundwater.

August 15, 2019: Aerotech conducted soil confirmation sampling and groundwater performance sampling to assess whether the remedial actions had met the objectives required for a no further action determination (Fig. 2 and Fig. 3).

- Soil samples were collected from 12 soil borings (B1 through B12).
- Groundwater data was collected to assess current groundwater conditions at the Site. All monitoring wells associated with the site were sampled and two hydro-punch grab samples were taken in order to better determine the lateral extent of the Site.
- All sampling results were below their respective CULs for soil and groundwater for the Method A unrestricted land use.

d. Selection of cleanup action.

PLIA has determined the cleanup action you selected for the Site, meets the substantive requirements of MTCA:

- Upgrading the existing fuel infrastructure by lining both 12,000 gallon USTs and updating the associated fuel conveyance piping.
- Excavation and removal of approximately 250 cubic yards of PCS at the Site.
- Treating the residuals with a Vapor Extraction System.
- Treating the residuals with a groundwater recovery and treatment system.
- Treating the residuals in place by injection of oxygen release compound.
- Performance of a remedial action pilot test with a chemical oxidation product (RegenOx) injection.
- Treating the residuals in place with a chemical oxidation product (PersulfOx) injection.
- Conducting confirmation soil sampling to confirm effectiveness of the remedial action.
- Conducting groundwater performance monitoring to confirm effectiveness of the remedial action.

e. Cleanup.

PLIA has determined the cleanup action you performed meets the substantive requirements of MTCA and met CULs at the POC.

i. Soil Direct Contact Exposure Pathway:

The soil cleanup action included:

- Excavation and removal of 250 cubic yards of PCS at the Site.
- Vapor extraction: A soil vapor extraction system was operated from late 1992 through October 1995.
- Injection of oxygen release compound: On August 25 and 26, 2004 approximately 1,100 pounds of oxygen release compound was injected into a total of 20 borings in the area of petroleum impacted soil and groundwater.
- Pilot test injection of chemical oxidation product: A small scale remedial action pilot test was performed on May 12, 2009. Approximately 630 pounds of RegenOx was injected with a direct push drill rig at six locations between approximately 5' and 10' bgs surrounding the location of monitoring well MW-5.
- Injection of chemical oxidation product: On September 9, 2016 and June 6, 2016, 771.4 pounds of PerSulfox was injected into monitoring well MW-5 for in-situ treatment of PCS and PCGW.
- POC: The limit of the excavation and the remediated PCS is bounded by the extent of confirmation sampling results below CULs (Fig. 2 and Table A1). A series of 12 soil borings (B1 to B12) were completed on August 18, 2019 in areas where soil had previously exceeded MTCA Method A CULs to confirm that the on-Site cleanup activities were successful. Analytical results of soil samples collected from 5' to 15' bgs were either non-detect or below MTCA CULs (Performance sampling result) (Fig. 3 and Table A1).

Result: The soil direct contact exposure pathway is no longer a concern at this Site.

ii. Groundwater Leaching Exposure Pathway:

The groundwater cleanup action included:

- Excavation and removal of 250 cubic yards of PCS at the Site in contact with groundwater.
- Groundwater recovery and treatment: A groundwater recovery sump was installed in 1992. Groundwater recovered from the sump was pumped through an activated carbon treatment system, then reintroduced to the subsurface via a reintroduction gallery (Fig. 7).
- Injection of oxygen release compound: On August 25 and 26, 2004 approximately 1,100 pounds of oxygen release compound was injected into a total of 20 borings in the area of petroleum impacted soil and groundwater.
- Pilot test injection of chemical oxidation product: A small scale remedial action pilot test was performed on May 12, 2009. Approximately 630 pounds of RegenOx was injected with a

direct push drill rig at six locations between approximately 5' and 10' bgs surrounding the location of monitoring well MW-5.

- Injection of chemical oxidation product: On September 9, 2016 and June 6, 2016, 771.4 pounds of PerSulfox was injected into monitoring well MW-5 for in-situ treatment of PCS and PCGW.
- Performance Groundwater Monitoring: The limit and extent of PCGW is bounded by the results of groundwater monitoring wells that are historically below CULs. For groundwater, impacts associated with petroleum at this Site were shown to be below CULs for four consecutive quarters at each of the following standard POC wells: MW-1, MW-2, MW-3, MW-4, MW-5, and MW-6 were below the Method A CULs for over four consecutive quarters of performance monitoring (Fig. 2 and Table A2).

Result: The groundwater leaching exposure pathway is no longer a concern at this Site.

iii. **Vapor Exposure:** The Property is adjacent to a restaurant which is within 30' laterally of locations where soil formerly exceeded CULs, however:

- PCS analytical results of soil confirmation samples collected from ground surface to 15' bgs were either non-detect or below MTCA CULs (performance sampling result) in areas where soil had previously exceeded MTCA Method A CULs (Fig. 3 and Table A1).
- PCGW analytical results of groundwater performance sampling at standard POC wells, MW-1, MW-2, MW-3, MW-4, MW-5 and MW-6, were below Method A CULs for four consecutive quarters at the POC wells (Fig 2 and Table A2).

Result: The vapor exposure pathway is no longer a concern at this Site.

iv. **Surface water:** Depth to the shallow groundwater at the Site ranges between 4.10 to 9.75' bgs. The regional groundwater discharge appears to be towards Green River which is located approximately 4,000' from the site. Mill Creek is located approximately 1,200' northeast of the site.

Result: The surface water exposure pathway is not a concern at this Site.

Limitations of the Opinion

1. **Opinion does not settle liability with the state.**

   Under the MTCA, liable persons are strictly liable, jointly and severally, for all remedial action costs and for all natural resource damages resulting from the release(s) 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 the Office of the Attorney General and the Department of Ecology (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 the 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 equivalent. Courts make that determination (RCW 70.105D.080 and WAC 173-340-545).

3. **State is immune from liability.**

   The state, PLIA, 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.

Termination of Agreement

Thank you for choosing to cleanup your Property under the PLIA Petroleum Technical Assistance Cleanup Program (PTAP). This opinion terminates the PTAP Agreement governing Project #PNW149.

Contact Information

If you have any questions about this opinion, please contact Justin Woerth by phone at 1-800-822-3905, or by email at justin.woerth@plia.wa.gov.

Sincerely,

Justin Woerth, GIT
Hydrogeologist

Nnamdi Madakor, P.HG, P.G.
Technical Programs Manager

Enclosure A: Fig. 1: Site Vicinity Map
Fig. 2: Groundwater MTCA Site Boundary Map
Fig. 3: Soil MTCA Site Boundary Map
Fig. 4: Cross Sections with Groundwater MTCA Boundary
Fig. 5: Cross Sections with Soil MTCA Boundary
Fig. 6: Groundwater Potentiometric Surface Map
Fig. 7: Former Remediation System Map

Table A1: Soil Analytical Data
Table A2: Groundwater Performance Analytical Data

cc: Brent Johnson
Kandie Thomson
Ms. Kristin Evered, PLIA (by email)
Ms. Carrie Pederson, PLIA (by email)

Enclosure A
Mr. Sudsy Site
PTAP Project No. PNW149

Figure 1: Site Vicinity Map

Figure 2: Groundwater MTCA Site Boundary Map

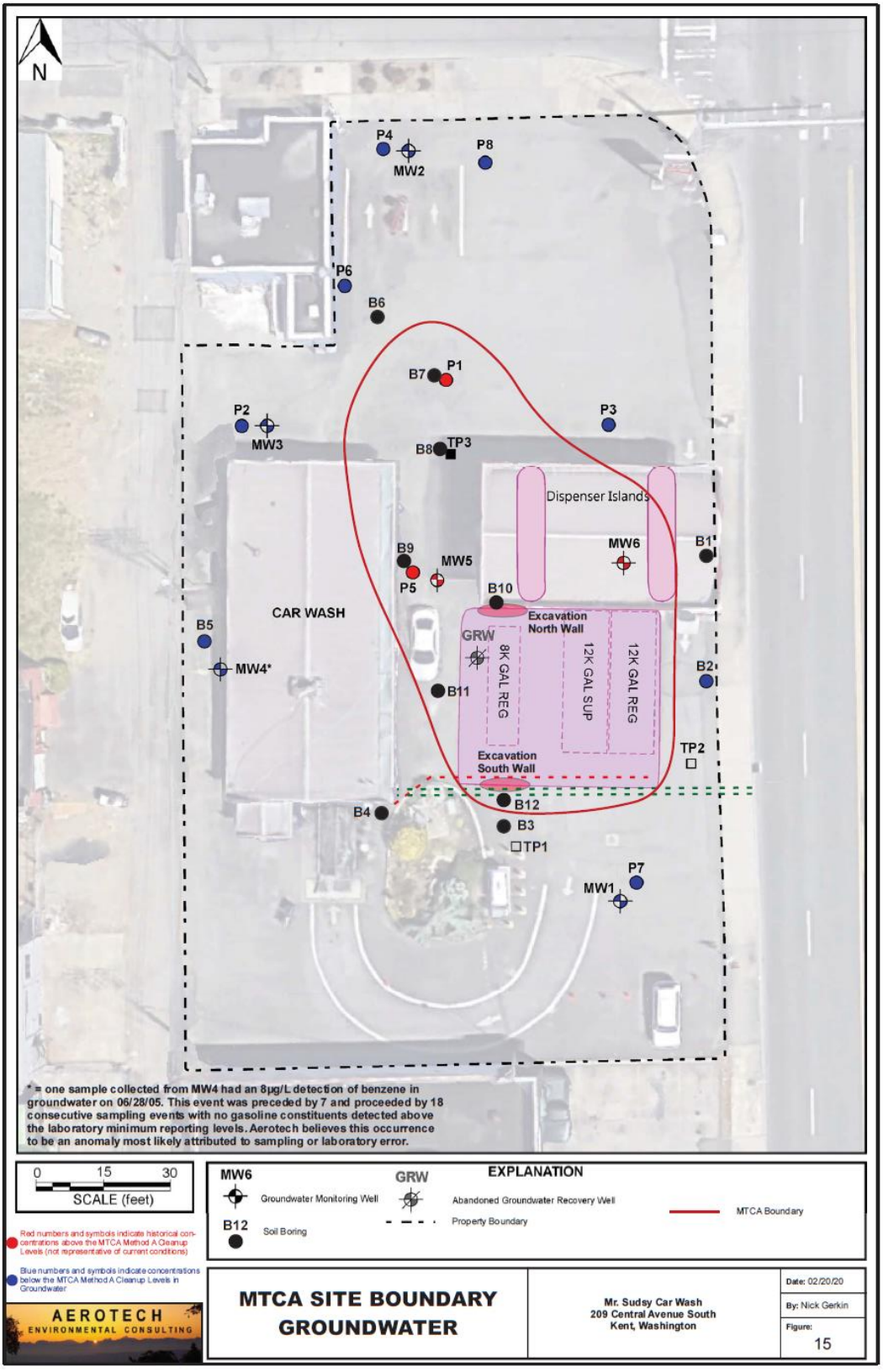

Figure 3: Soil MTCA Site Boundary Map

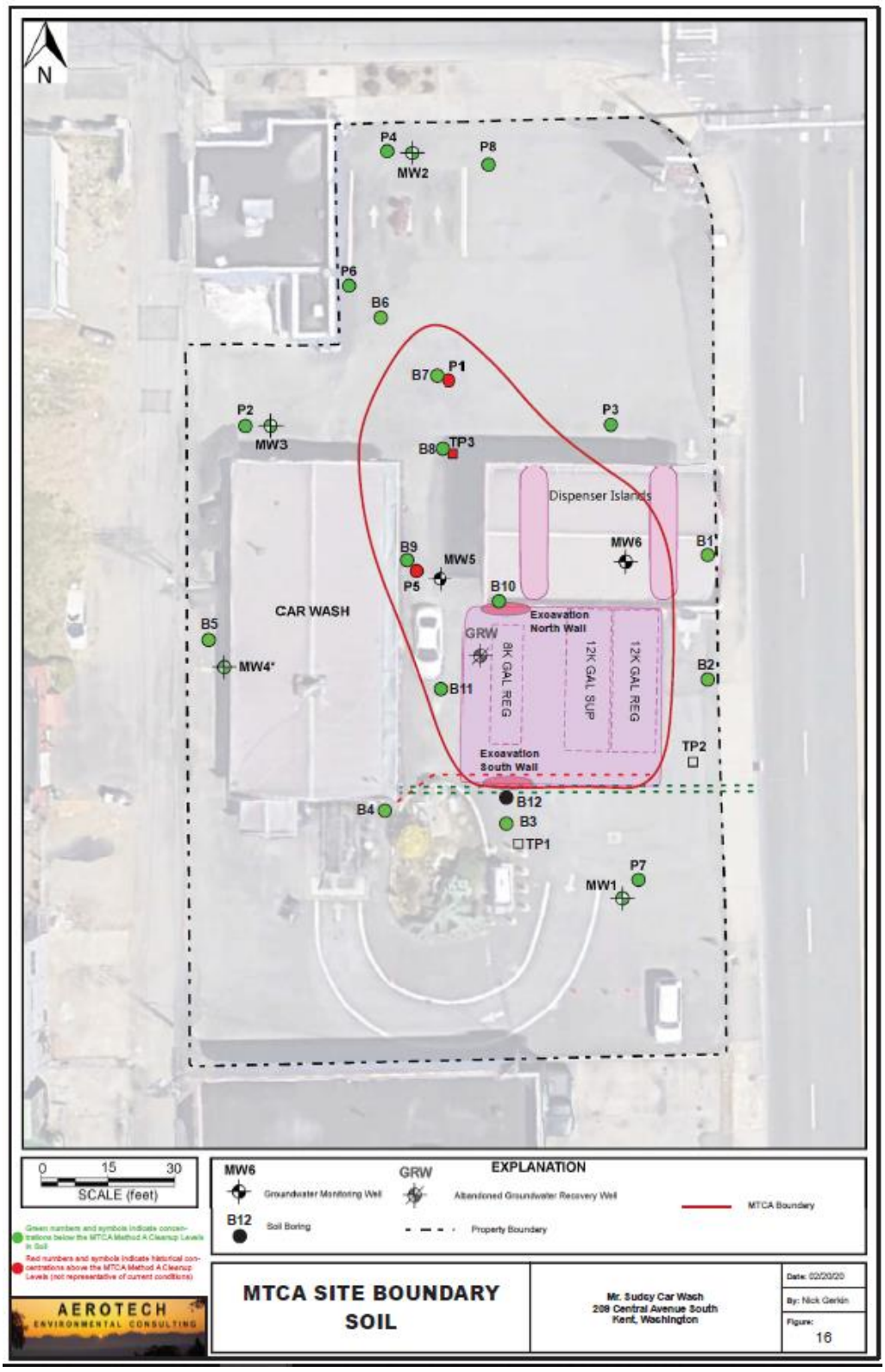

Figure 4: Cross Sections with Groundwater MTCA Boundary

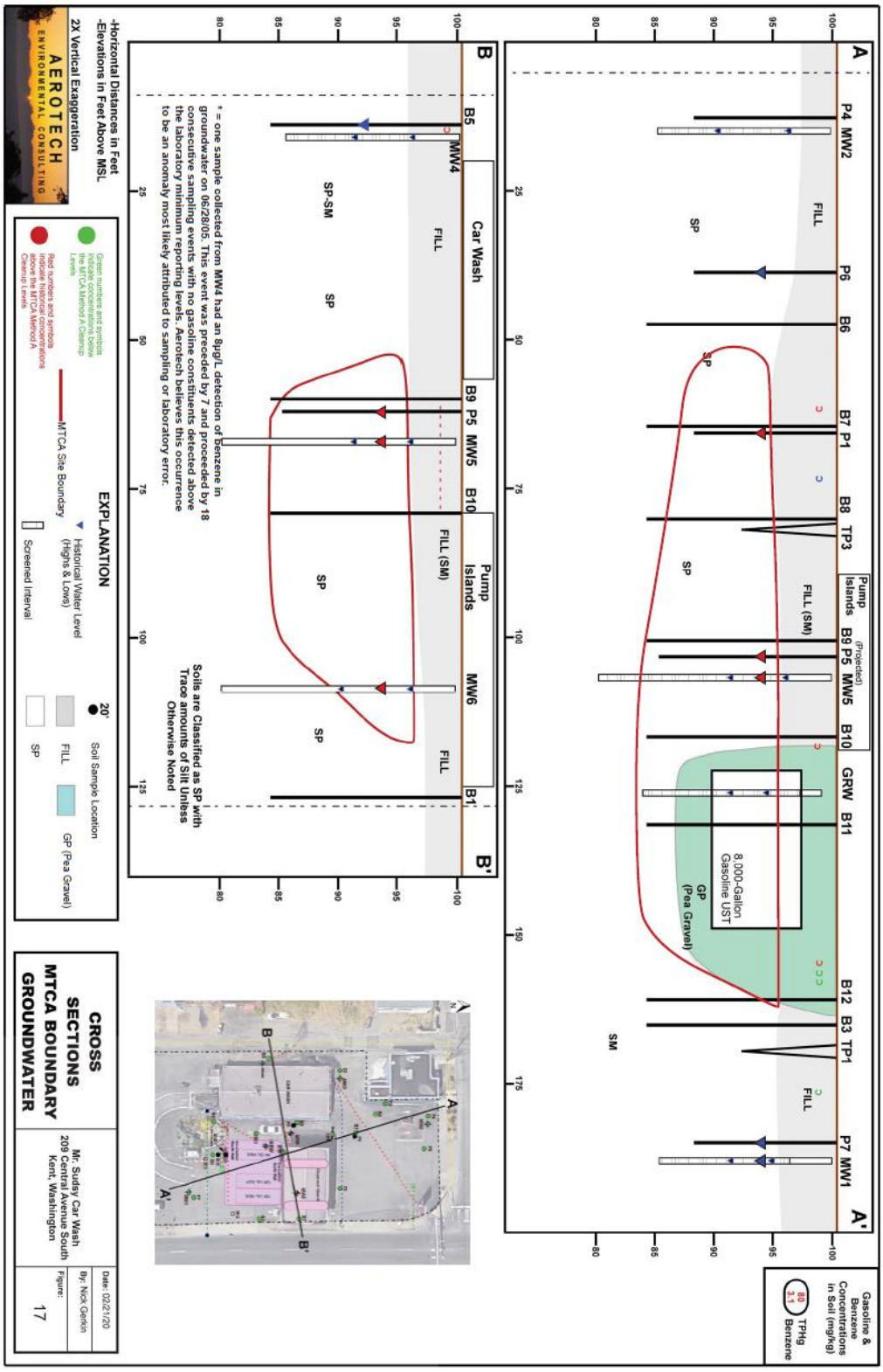

Figure 5: Cross Sections with Soil MTCA Boundary

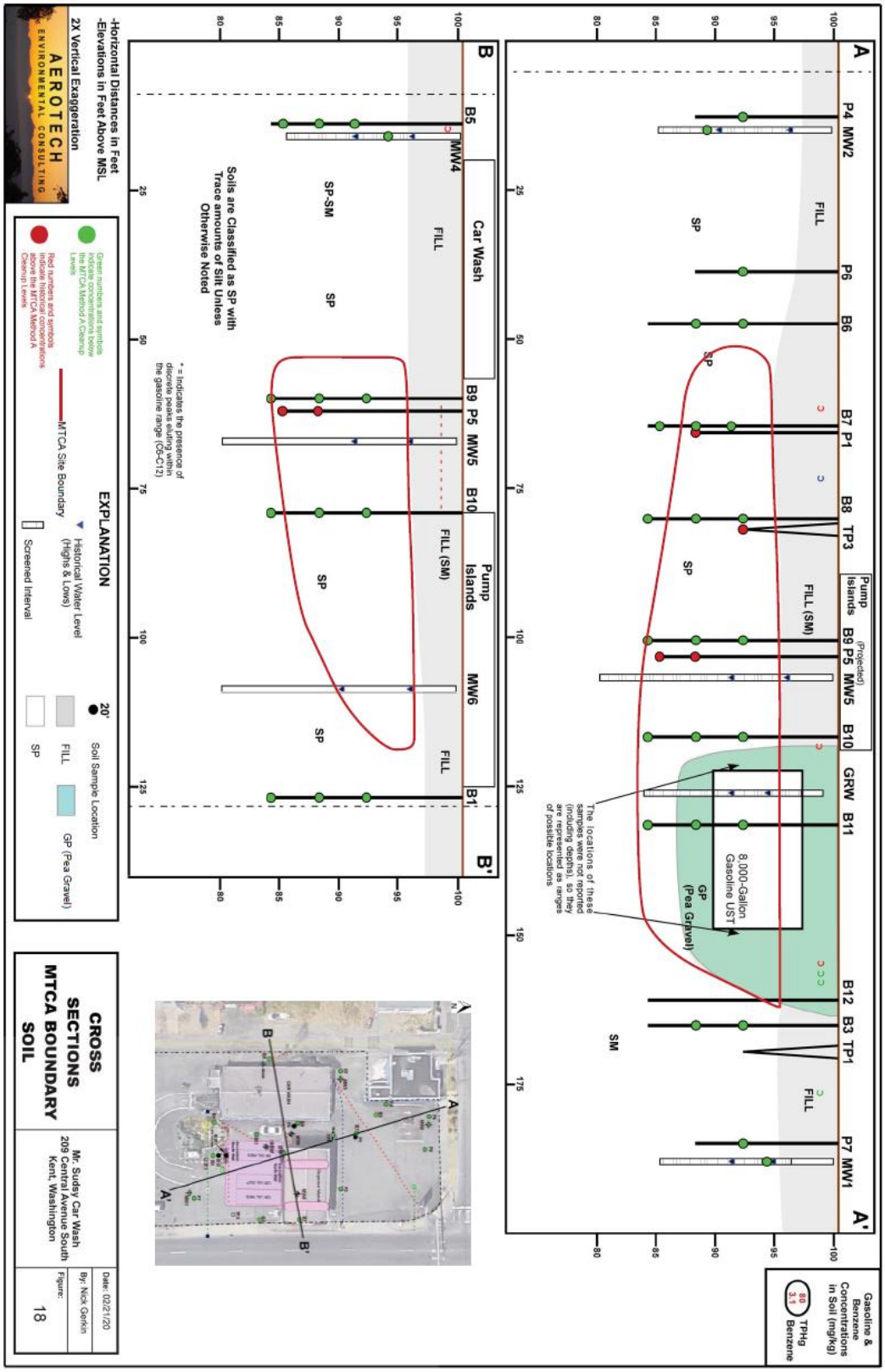

Figure 6: Groundwater Potentiometric Surface Map

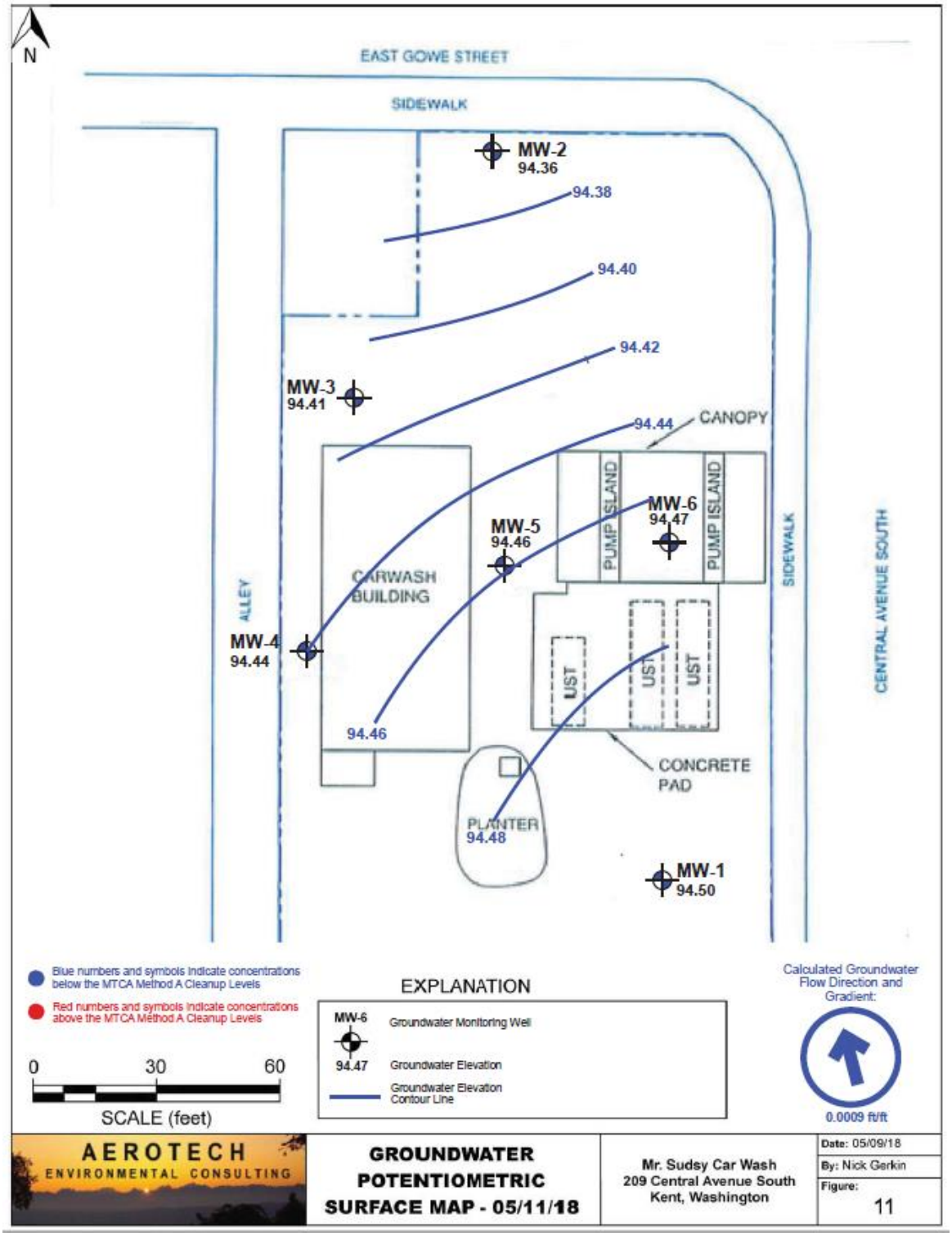

Figure 7: Former Remediation System Map

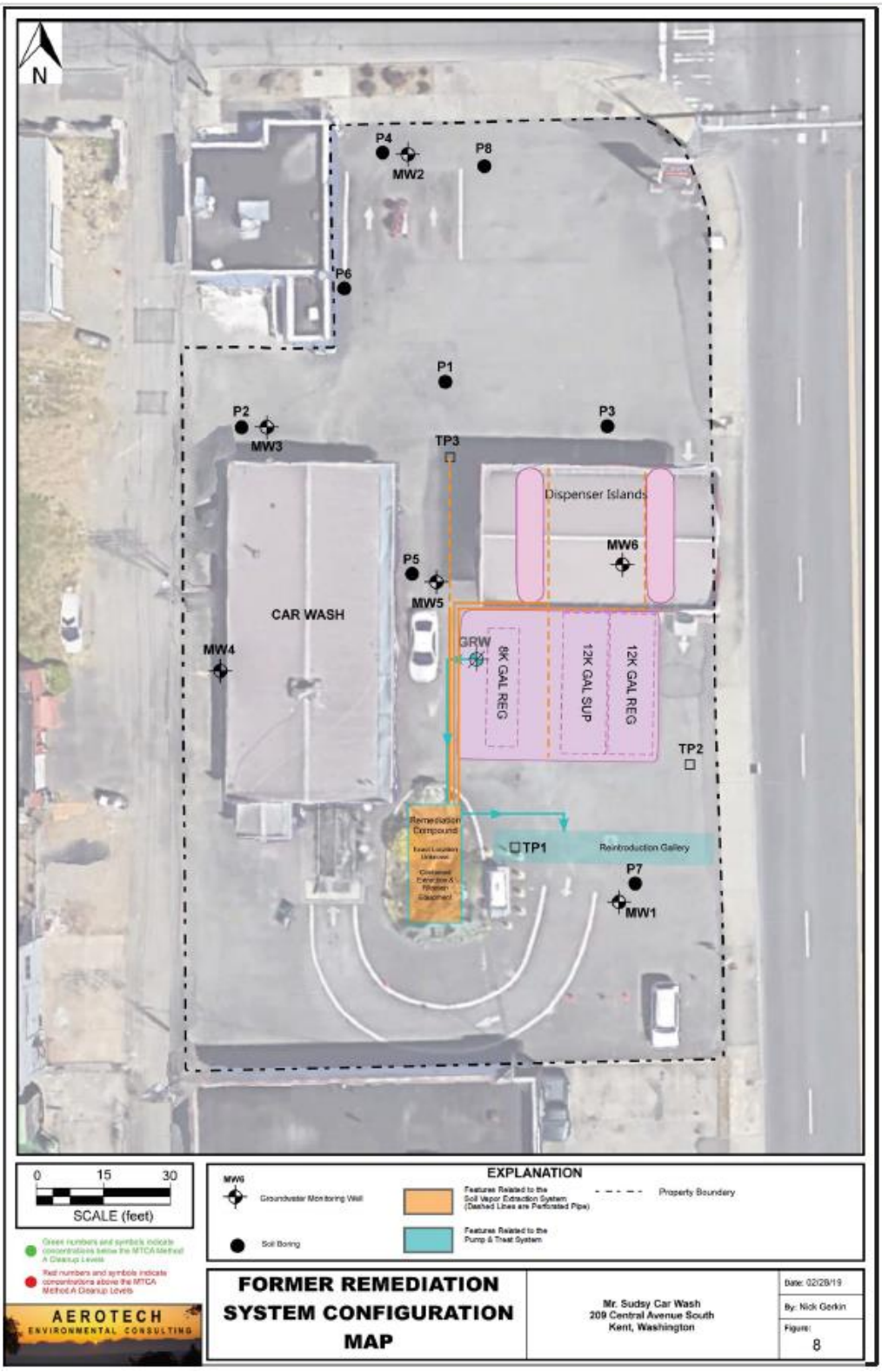

Table A1: Soil Analytical Data

TABLE 1
SOIL ANALYTICAL RESULTS
Mr. Sudsy Car Wash (PTAP PNW149)
209 Central Avenue South
Kent, Washington

Applied Geotechnology, Inc. - Site Check During Underground Storage Tank Installation Mr. Sudsy Car Wash - August 31, 1992

Sample ID	Soil Boring/ Well ID	Sampling Date	Sample Depth	TPH	TPHg	TPHd	TPHo	Benzene	Toluene	Ethyl-benzene	Total Xylenes	Lead
			Feet BGS	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
Test Pit No. 3	TP3	07/07/92	8	--	80	--	--	3.1	0.070	3.2	0.31	--
Excavation, South wall	--	07/07/92	--	--	1,600	--	--	0.28	8.3	27	150	--
Excavation, North wall	--	07/07/92	--	110	2,300	--	--	2.7	79	51	290	8.8
MTCA Method A Cleanup Levels					100^	2,000	2,000	0.03	7	6	6	250

LSI Adapt - Phase II Environmental Site Assessment Mr. Sudsy Carwash-Kent - November 21, 2002

Sample ID	Soil Boring Well ID	Sampling Date	Sample Depth	TPH	TPHg	TPHd	TPHo	Benzene	Toluene	Ethyl-benzene	Total Xylenes	Lead
			Feet BGS	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
P1-12	P1	11/11/02	12	--	<10	--	--	0.08	<0.05	<0.05	<0.05	--
P2-12	P2	11/11/02	12	--	<10	--	--	<0.02	<0.05	<0.05	<0.05	--
P3-8	P3	11/11/02	8	--	<10	--	--	<0.02	<0.05	<0.05	<0.05	--
P4-8	P4	11/11/02	8	--	<10	--	--	<0.02	<0.05	<0.05	<0.05	--
P5-12	P5	11/11/02	12	--	<10	--	--	0.29	<0.05	<0.05	<0.05	--
P5-15	P5	11/11/02	15	--	<10	--	--	0.49	<0.05	<0.05	<0.05	--
P6-8	P6	11/11/02	8	--	<10	--	--	<0.02	<0.05	<0.05	<0.05	--
P7-8	P7	11/11/02	8	--	<10	--	--	<0.02	<0.05	<0.05	<0.05	--
P8-8	P8	11/11/02	8	--	<10	--	--	<0.02	<0.05	<0.05	<0.05	--
MTCA Method A Cleanup Levels					100^	2,000	2,000	0.03	7	6	6	250

LSI Adapt - Groundwater Monitoring Well Installation, and 1st Quarter Groundwater Quality Monitoring Report - March 14, 2003

Sample ID	Soil Boring/Point	Sampling Date	Sample Depth	TPH	TPHg	TPHd	TPHo	Benzene	Toluene	Ethyl-benzene	Total Xylenes	Total Lead
			Feet BGS	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
MW1-6	MW1	02/12/03	6	--	<6.4	--	--	<0.013	<0.064	<0.064	<0.064	--
MW2-11	MW2	02/12/03	11	--	<6.5	--	--	<0.013	<0.065	<0.065	<0.065	--
MW3-6	MW3	02/12/03	6	--	<6.3	--	--	<0.013	<0.063	<0.063	<0.063	--
MW4-6	MW4	02/12/03	6	--	<6.8	--	--	<0.014	<0.068	<0.068	<0.068	<6.8
MTCA Method A Cleanup Levels					100^	2,000	2,000	0.03	7	6	6	250

Aerotech - Further Subsurface Investigation Mr. Sudsy Carwash-Kent - August 13, 2019

Sample ID	Soil Boring Well ID	Sampling Date	Sample Depth	TPH	TPHg	TPHd	TPHo	Benzene	Toluene	Ethyl-benzene	Total Xylenes	Lead
			Feet BGS	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
B1(8)	B1	08/13/19	8	--	19.6*	--	--	<0.0265	<0.0265	<0.0331	<0.0663	--
B1(12)	B1	08/13/19	12	--	<6.00	--	--	<0.0240	<0.0240	<0.0300	<0.0600	--
B1(16)	B1	08/13/19	16	--	<6.49	--	--	<0.0259	<0.0259	<0.0324	<0.0649	--
B2(8)	B2	08/13/19	8	--	10.1*	--	--	<0.0261	<0.0261	<0.0327	<0.0653	--
B2(12)	B2	08/13/19	12	--	<7.49	--	--	<0.0300	<0.0300	<0.0374	<0.0749	--
B3(8)	B3	08/13/19	8	--	<6.39	--	--	<0.0256	<0.0256	<0.0320	<0.0639	--
B3(12)	B3	08/13/19	12	--	<7.11	--	--	<0.0284	<0.0284	<0.0355	<0.0711	--
B4(9)	B4	08/13/19	9	--	<6.76	--	--	<0.0270	<0.0270	<0.0338	<0.0676	--
B4(13)	B4	08/13/19	13	--	<6.30	--	--	<0.0252	<0.0252	<0.0315	<0.0630	--
B5(8)	B5	08/13/19	8	--	<6.76	--	--	<0.0270	<0.0270	<0.0338	<0.0676	--
B5(12)	B5	08/13/19	12	--	<6.47	--	--	<0.0259	<0.0259	<0.0324	<0.0647	--
B5(16)	B5	08/13/19	16	--	<6.38	--	--	<0.0255	<0.0255	<0.0319	<0.0638	--
B6(8)	B6	08/13/19	8	--	6.37*	--	--	<0.0230	<0.0230	<0.0288	<0.0576	--
B6(12)	B6	08/13/19	12	--	<6.44	--	--	<0.0258	<0.0258	<0.0322	<0.0644	--
B7(9)	B7	08/13/19	9	--	21.7	--	--	<0.0253	<0.0253	<0.0316	<0.0632	--
B7(12)	B7	08/13/19	12	--	<6.64	--	--	<0.0266	<0.0266	<0.0332	<0.0664	--
B7(15)	B7	08/13/19	15	--	12.8	--	--	<0.0256	<0.0256	<0.0320	<0.0641	--
B8(8)	B8	08/13/19	8	--	<6.03	--	--	<0.0241	<0.0241	<0.0302	<0.0603	--
B8(12)	B8	08/13/19	12	--	36.9	--	--	<0.0234	<0.0234	<0.0292	<0.0584	--
B8(16)	B8	08/13/19	16	--	<6.05	--	--	<0.0242	<0.0242	<0.0302	<0.0605	--
B9(8)	B9	08/13/19	8	--	<6.15	--	--	<0.0243	<0.0243	<0.0304	<0.0608	--
B9(12)	B9	08/13/19	12	--	<5.77	--	--	<0.0231	<0.0231	<0.0288	<0.0577	--
B9(16)	B9	08/13/19	16	--	<6.34	--	--	<0.0254	<0.0254	<0.0317	<0.0634	--
B10(8)	B10	08/13/19	8	--	<6.45	--	--	<0.0258	<0.0258	<0.0323	<0.0645	--
B10(12)	B10	08/13/19	12	--	<6.88	--	--	<0.0275	<0.0275	<0.0344	<0.0688	--
B10(16)	B10	08/13/19	16	--	<6.85	--	--	<0.0274	<0.0274	<0.0342	<0.0685	--
B11(8)	B11	08/13/19	8	--	<5.38	--	--	<0.0215	<0.0215	<0.0269	<0.0538	--
B11(12)	B11	08/13/19	12	--	<6.05	--	--	<0.0242	<0.0242	<0.0303	<0.0605	--
B11(16)	B11	08/13/19	16	--	<6.17	--	--	<0.0247	<0.0247	<0.0309	<0.0617	--
MTCA Method A Cleanup Levels					100^	2,000	2,000	0.03	7	6	6	250

EXPLANATION
MTCA = Model Toxic Control Act Cleanup Level (WAC173-340-900)
BGS = Below Ground Surface mg/kg = milligram of analyte per kilogram of soil
< = not detected at indicated Laboratory Detection Limits -- = not analyzed
Benzene , Toluene, Ethylbenzene, Xylenes by EPA Method 8021B
TPH - Total Petroleum Hydrocarbons by EPA Method 418.1
TPHg - Total Petroleum Hydrocarbons - Gasoline by NWTPH-Gx
TPHd - Total Petroleum Hydrocarbons - Diesel by NWTPH-Dx
TPHo - Total Petroleum Hydrocarbons - Motor Oil by NWTPH-Dx extended
Lead by EPA Methods 7420 (1992) and 6010B
^ = This value can only be used if no benzene is present in the soil at the site and the total of ethylbenzene, toluene and xylene do not exceed 1% of the gasoline mixture.
* = Indicates the presence of discrete peaks eluting within the gasoline range (C6-C12)
Bolded numbers and red-shaded cells denote concentrations above the MTCA Method A Cleanup Levels for soil

Table A2: Groundwater Performance Analytical Data

TABLE 2
GROUNDWATER ANALYTICAL RESULTS
Mr. Sudsy Car Wash (PTAP PNW149)
209 Central Avenue South
Kent, Washington 98032

GWR (Decommissioned 07/13/09)

Well Depth	Sampling Date	Ground Water Level	Elevation (TOC north)	Water Level Elevation	TPHg	TPHd	TPHo	Benzene	Toluene	Ethyl-benzene	Xylenes	EDB	EDC	MTBE	Dissolved Lead	Total Lead
Feet		Feet Below TOC	Feet Above MSL	Feet Above MSL	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L
--	10/31/02	--	99.05	--	1,200	--	--	1,800	110	27	92	--	--	Detected	<1.1*	--
	02/14/03	5.63	99.05	93.42	<1,000	--	--	960	18	15	18	--	--	--	--	--
	06/05/03	5.61	99.05	93.44	1,100	--	--	920	160	<10	68	--	--	--	--	--
	09/24/03	7.96	99.05	91.09	560	--	--	1,600	13	9.3	58	--	--	--	--	--
	12/24/03	6.02	99.05	93.03	840	--	--	1,000	23	17	40	--	--	--	--	--
	03/24/04	4.92	99.05	94.13	590	--	--	970	31	13	23	--	--	--	--	--
	09/29/04	7.31	99.05	91.74	3,700	--	--	3,700	530	27	250	--	--	--	--	--
		MTCA Method A Cleanup Levels			1,000^	500	500	5	1,000	700	1,000	0.01	5	20	15	15

MW1

Well Depth	Sampling Date	Ground Water Level	Elevation (TOC north)	Water Level Elevation	TPHg	TPHd	TPHo	Benzene	Toluene	Ethyl-benzene	Xylenes	EDB	EDC	MTBE	Dissolved Lead	Total Lead
Feet		Feet Below TOC	Feet Above MSL	Feet Above MSL	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L
14.2	02/14/03	6.55	100.00	93.45	<100	--	--	<1.0	<1.0	<1.0	<1.0	--	--	--	--	--
	06/05/03	6.53	100.00	93.47	<100	--	--	<1.0	<1.0	<1.0	<1.0	--	--	--	--	--
	09/24/03	8.88	100.00	91.12	<100	--	--	<1.0	<1.0	<1.0	<1.0	--	--	--	--	--
	12/24/03	6.95	100.00	93.05	<100	--	--	<1.0	<1.0	<1.0	<1.0	--	--	--	--	--
	03/24/04	5.85	100.00	94.15	<100	--	--	<1.0	<1.0	<1.0	<1.0	--	--	--	--	--
	09/29/04	8.26	100.00	91.74	<100	--	--	<1.0	<1.0	<1.0	<1.0	--	--	--	--	--
	12/20/04	7.37	100.00	92.63	<100	--	--	<1.0	<1.0	<1.0	<1.0	--	--	--	--	--
	03/18/08	6.43	100.00	93.57	<100	--	--	<1.0	<1.0	<1.0	<3.0	--	--	--	--	--
	08/01/08	7.40	100.00	92.60	<100	--	--	<1.0	<1.0	<1.0	<3.0	--	--	--	--	--
	04/22/09	5.45	100.00	94.55	<100	--	--	<1.0	<1.0	<1.0	<3.0	--	--	--	--	--
	08/18/17	7.05	100.00	92.95	<100	<200	<500	<1.0	<1.0	<1.0	<1.0	<0.01	<1.0	<5.0	--	<2
	11/17/17	7.40	100.00	92.60	<100	<200	<500	<1.0	<1.0	<1.0	<1.0	<0.01	<1.0	<5.0	--	<2
	02/09/18	4.76	100.00	95.24	<100	<200	<500	<1.0	<1.0	<1.0	<1.0	--	--	--	--	<2
	05/11/18	5.50	100.00	94.50	<100	<200	<500	<1.0	<1.0	<1.0	<1.0	--	--	--	--	<2
	08/16/18	NM	100.00	NM	--	--	--	--	--	--	--	--	--	--	--	--
		MTCA Method A Cleanup Levels			1,000^	500	500	5	1,000	700	1,000	0.01	5	20	15	15

Table A2: Groundwater Performance Analytical Data Continued

TABLE 2
GROUNDWATER ANALYTICAL RESULTS
Mr. Sudsy Car Wash (PTAP PNW149)
209 Central Avenue South
Kent, Washington 98032

MW2

Well Depth	Sampling Date	Ground Water Level	Elevation (TOC north)	Water Level Elevation	TPHg	TPHd	TPHo	Benzene	Toluene	Ethyl-benzene	Xylenes	EDB	EDC	MTBE	Dissolved Lead	Total Lead
Feet		Feet Below TOC	Feet Above MSL	Feet Above MSL	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L
14.5	02/14/03	6.06	99.45	93.39	<100	--	--	<1.0	1.2	<1.0	<1.0	--	--	--	--	--
	06/05/03	6.06	99.45	93.39	<100	--	--	<1.0	<1.0	<1.0	<1.0	--	--	--	--	--
	09/24/03	8.36	99.45	91.09	<100	--	--	<1.0	<1.0	<1.0	<1.0	--	--	--	--	--
	12/24/03	6.42	99.45	93.03	<100	--	--	<1.0	<1.0	<1.0	<1.0	--	--	--	--	--
	03/24/04	5.35	99.45	94.10	<100	--	--	<1.0	<1.0	<1.0	<1.0	--	--	--	--	--
	09/29/04	7.72	99.45	91.73	<100	--	--	<1.0	<1.0	<1.0	<1.0	--	--	--	--	--
	03/18/08	5.95	99.45	93.50	<100	--	--	<1.0	<1.0	<1.0	<3.0	--	--	--	--	--
	08/01/08	6.91	99.45	92.54	<100	--	--	<1.0	<1.0	<1.0	<3.0	--	--	--	--	--
	04/22/09	4.99	99.45	94.46	<100	--	--	<1.0	<1.0	<1.0	<3.0	--	--	--	--	--
	03/20/15	4.99	99.45	94.46	<100	<200	<500	<1.0	<1.0	<1.0	<1.0	<0.01	<1.0	<5.0	--	--
	06/25/15	6.50	99.45	92.95	<100	<200	<500	<1.0	<1.0	<1.0	<1.0	<0.01	<1.0	<5.0	--	--
	10/08/15	8.34	99.45	91.11	<100	<200	<500	<1.0	<1.0	<1.0	<1.0	<0.01	<1.0	<5.0	--	--
	12/14/15	9.75	99.45	89.70	<100	<200	<500	<1.0	<1.0	<1.0	<1.0	<0.01	<1.0	<5.0	--	--
	03/21/16	3.81	99.45	95.64	<100	<200	<400	<1.0	<1.0	<1.0	<2.0	<1.0	<1.0	<5.0	--	--
	11/03/16	6.85	99.45	92.60	<100	<200	<500	<1.0	<1.0	<1.0	<1.0	<0.01	<1.0	<5.0	<2	<2
	02/07/17	4.98	99.45	94.47	<100	<200	<500	<1.0	<1.0	<1.0	<1.0	<0.01	<1.0	<5.0	<2	<2
	05/08/17	4.19	99.45	95.26	<100	<200	<500	<1.0	<1.0	<1.0	<1.0	<0.01	<1.0	<5.0	<2	<2
	08/18/17	6.58	99.45	92.87	<100	<200	<500	<1.0	<1.0	<1.0	<1.0	<0.01	<1.0	<5.0	--	<2
	11/17/17	6.90	99.45	92.55	<100	<200	<500	<1.0	<1.0	<1.0	<1.0	<0.01	<1.0	<5.0	--	<2
	02/09/18	4.35	99.45	95.10	<100	<200	<500	<1.0	<1.0	<1.0	<1.0	--	--	--	--	<2
	05/11/18	5.09	99.45	94.36	<100	<200	<500	<1.0	<1.0	<1.0	<1.0	--	--	--	--	<2
	08/16/18	7.26	99.45	92.20	<100	--	--	<1.0	<1.0	<1.0	<1.0	--	--	--	--	--
		MTCA Method A Cleanup Levels			1,000^	500	500	5	1,000	700	1,000	0.01	5	20	15	15

Table A2: Groundwater Performance Analytical Data Continued

TABLE 2
GROUNDWATER ANALYTICAL RESULTS
Mr. Sudsy Car Wash (PTAP PNW149)
209 Central Avenue South
Kent, Washington 98032

MW3

Well Depth	Sampling Date	Ground Water Level	Elevation (TOC north)	Water Level Elevation	TPHg	TPHd	TPHo	Benzene	Toluene	Ethyl-benzene	Xylenes	EDB	EDC	MTBE	Dissolved Lead	Total Lead
Feet		Feet Below TOC	Feet Above MSL	Feet Above MSL	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L
14.4	02/14/03	6.67	100.04	93.37	<100	--	--	<1.0	<1.0	<1.0	<1.0	--	--	--	--	--
	06/05/03	6.64	100.04	93.40	<100	--	--	<1.0	<1.0	<1.0	<1.0	--	--	--	--	--
	09/24/03	8.98	100.04	91.06	<100	--	--	<1.0	<1.0	<1.0	<1.0	--	--	--	--	--
	12/24/03	7.04	100.04	93.00	<100	--	--	<1.0	<1.0	<1.0	<1.0	--	--	--	--	--
	03/24/04	5.95	100.04	94.09	<100	--	--	<1.0	<1.0	<1.0	<1.0	--	--	--	--	--
	09/29/04	8.32	100.04	91.72	<100	--	--	<1.0	<1.0	<1.0	<1.0	--	--	--	--	--
	12/20/04	7.46	100.04	92.58	<100	--	--	<1.0	<1.0	<1.0	<1.0	--	--	--	--	--
	06/28/05	6.96	100.04	93.08	<100	--	--	<1.0	<1.0	<1.0	<1.0	--	--	--	--	--
	11/23/05	8.10	100.04	91.94	<100	--	--	<1.0	<1.0	<1.0	<1.0	--	--	--	--	--
	02/22/06	5.11	100.04	94.93	<100	--	--	<1.0	<1.0	<1.0	<1.0	--	--	--	--	--
	05/03/06	5.75	100.04	94.29	<100	--	--	<1.0	<1.0	<1.0	<1.0	--	--	--	--	--
	03/18/08	6.50	100.04	93.54	<100	--	--	<1.0	<1.0	<1.0	<3.0	--	--	--	--	--
	08/01/08	7.51	100.04	92.53	<100	--	--	<1.0	<1.0	<1.0	<3.0	--	--	--	--	--
	04/22/09	5.55	100.04	94.49	<100	--	--	<1.0	<1.0	<1.0	<3.0	--	--	--	--	--
	03/20/15	5.50	100.04	94.54	<100	<200	<500	<1.0	<1.0	<1.0	<1.0	<0.01	<1.0	<5.0	--	--
	06/25/15	7.10	100.04	92.94	<100	<200	<500	<1.0	<1.0	<1.0	<1.0	<0.01	<1.0	<5.0	--	--
	10/08/15	8.95	100.04	91.09	<100	<200	<500	<1.0	<1.0	<1.0	<1.0	<0.01	<1.0	<5.0	--	--
	12/14/15	9.20	100.04	90.84	<100	<200	<500	<1.0	<1.0	<1.0	<1.0	<0.01	<1.0	<5.0	--	--
	03/21/16	4.30	100.04	95.74	<100	<200	<400	<1.0	<1.0	<1.0	<2.0	<1.0	<1.0	<5.0	--	--
	11/03/16	7.47	100.04	92.57	<100	<200	<500	<1.0	<1.0	<1.0	<1.0	<0.01	<1.0	<5.0	<2	<2
	02/07/17	5.58	100.04	94.46	<100	<200	<500	<1.0	<1.0	<1.0	<1.0	<0.01	<1.0	<5.0	<2	<2
	05/08/17	4.71	100.04	95.34	<100	<200	<500	<1.0	<1.0	<1.0	<1.0	<0.01	<1.0	<5.0	<2	<2
	08/18/17	7.17	100.04	92.87	<100	<200	<500	<1.0	<1.0	<1.0	<1.0	<0.01	<1.0	<5.0	--	<2
	11/17/17	6.90	100.04	93.14	<100	<200	<500	<1.0	<1.0	<1.0	<1.0	<0.01	<1.0	<5.0	--	<2
	02/09/18	4.89	100.04	95.15	<100	<200	<500	<1.0	<1.0	<1.0	<1.0	--	--	--	--	<2
	05/11/18	5.63	100.04	94.41	<100	<200	<500	<1.0	<1.0	<1.0	<1.0	--	--	--	--	<2
	08/16/18	7.86	100.04	92.19	<100	--	--	<1.0	<1.0	<1.0	<1.0	--	--	--	--	<2
		MTCA Method A Cleanup Levels			1,000^	500	500	5	1,000	700	1,000	0.01	5	20	15	15

Table A2: Groundwater Performance Analytical Data Continued

TABLE 2
GROUNDWATER ANALYTICAL RESULTS
Mr. Sudsy Car Wash (PTAP PNW149)
209 Central Avenue South
Kent, Washington 98032

MW4

Well Depth	Sampling Date	Ground Water Level	Elevation (TOC - north)	Water Level Elevation	TPHg	TPHd	TPHo	Benzene	Toluene	Ethyl-benzene	Xylenes	EDB	EDC	MTBE	Dissolved Lead	Total Lead
Feet		Feet Below TOC	Feet Above MSL	Feet Above MSL	µg/l	µg/l	µg/l	µg/l	µg/l	µg/l	µg/l	µg/l	µg/l	µg/l	µg/l	µg/l
14.8	02/14/03	6.74	100.13	93.39	<100	--	--	<1.0	<1.0	<1.0	<1.0	--	--	--	--	--
	06/05/03	6.71	100.13	93.42	<100	--	--	<1.0	<1.0	<1.0	<1.0	--	--	--	--	--
	09/24/03	9.06	100.13	91.07	<100	--	--	<1.0	<1.0	<1.0	<1.0	--	--	--	--	--
	12/24/03	7.13	100.13	93.00	<100	--	--	<1.0	<1.0	<1.0	<1.0	--	--	--	--	--
	03/24/04	6.03	100.13	94.10	<100	--	--	<1.0	<1.0	<1.0	<1.0	--	--	--	--	--
	09/29/04	8.43	100.13	91.70	<100	--	--	<1.0	<1.0	<1.0	<1.0	--	--	--	--	--
	12/20/04	7.56	100.13	92.57	<100	--	--	<1.0	<1.0	<1.0	<1.0	--	--	--	--	--
	06/28/05	7.01	100.13	93.12	<100	--	--	8	<1.0	<1.0	<1.0	--	--	--	--	--
	11/23/05	8.20	100.13	91.93	<100	--	--	<1.0	<1.0	<1.0	<1.0	--	--	--	--	--
	02/22/06	5.13	100.13	95.00	<100	--	--	<1.0	<1.0	<1.0	<1.0	--	--	--	--	--
	05/03/06	5.81	100.13	94.32	<100	--	--	<1.0	<1.0	<1.0	<1.0	--	--	--	--	--
	03/18/08	6.60	100.13	93.53	<100	--	--	<1.0	<1.0	<1.0	<3.0	--	--	--	--	--
	08/01/08	7.58	100.13	92.55	<100	--	--	<1.0	<1.0	<1.0	<3.0	--	--	--	--	--
	04/22/09	5.60	100.13	94.53	<100	--	--	<1.0	<1.0	<1.0	<3.0	--	--	--	--	--
	03/20/15	5.60	100.13	94.53	<100	<200	<500	<1.0	<1.0	<1.0	<1.0	<0.01	<1.0	<5.0	--	--
	06/25/15	7.16	100.13	92.97	<100	<200	<500	<1.0	<1.0	<1.0	<1.0	<0.01	<1.0	<5.0	--	--
	10/08/15	9.04	100.13	91.09	<100	<200	<500	<1.0	<1.0	<1.0	<1.0	<0.01	<1.0	<5.0	--	--
	12/14/15	9.06	100.13	91.07	<100	<200	<500	<1.0	<1.0	<1.0	<1.0	<0.01	<1.0	<5.0	--	--
	03/21/16	4.30	100.13	95.83	<100	<200	<400	<1.0	<1.0	<1.0	<2.0	<1.0	<1.0	<5.0	--	--
	11/03/16	7.57	100.13	92.56	<100	<200	<500	<1.0	<1.0	<1.0	<1.0	<0.01	<1.0	<5.0	<2	<2
	02/07/17	5.65	100.13	94.48	<100	<200	<500	<1.0	<1.0	<1.0	<1.0	<0.01	<1.0	<5.0	<2	<2
	05/08/17	4.71	100.13	95.43	<100	<200	<500	<1.0	<1.0	<1.0	<1.0	<0.01	<1.0	<5.0	<2	<2
	08/18/17	7.22	100.13	92.91	<100	<200	<500	<1.0	<1.0	<1.0	<1.0	<0.01	<1.0	<5.0	--	<2
	11/17/17	7.59	100.13	92.54	<100	<200	<500	<1.0	<1.0	<1.0	<1.0	<0.01	<1.0	<5.0	--	<2
	02/09/18	4.93	100.13	95.20	<100	<200	<500	<1.0	<1.0	<1.0	<1.0	--	--	--	--	<2
	05/11/18	5.69	100.13	94.44	<100	<200	<500	<1.0	<1.0	<1.0	<1.0	--	--	--	--	<2
	08/16/18	7.95	100.13	92.19	--	--	--	--	--	--	--	--	--	--	--	--
		MTCA Method A Cleanup Levels			1,000^	500	500	5	1,000	700	1,000	0.01	5	20	15	15

Table A2: Groundwater Performance Analytical Data Continued

TABLE 2
GROUNDWATER ANALYTICAL RESULTS
Mr. Sudsy Car Wash (PTAP PNW149)
209 Central Avenue South
Kent, Washington 98032

MW5

Well Depth	Sampling Date	Ground Water Level	Elevation (TOC north)	Water Level Elevation	TPHg	TPHd	TPHo	Benzene	Toluene	Ethyl-benzene	Xylenes	EDB	EDC	MTBE	Dissolved Lead	Total Lead
Feet		Feet Below TOC	Feet Above MSL	Feet Above MSL	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L
19.2	03/24/04	5.82	99.92	94.10	7,100	--	--	640	<5.0	27	108	--	--	--	--	--
	09/29/04	8.19	99.92	91.73	1,900	--	--	130	7.0	<50	13	--	--	--	--	--
	12/20/04	7.32	99.92	92.60	<500	--	--	63	5.7	<5.0	<5.0	--	--	--	--	--
	06/28/05	6.78	99.92	93.14	4,800	--	--	600	33	16	53	--	--	--	--	--
	11/23/05	7.96	99.92	91.96	120	--	--	50	<1.0	<1.0	<1.0	--	--	--	--	--
	02/22/06	4.93	99.92	94.99	3,000	--	--	400	<4.0	10	23.2	--	--	--	--	--
	05/03/06	5.60	99.92	94.32	6,300	--	--	1,100	33	21	41	--	--	--	--	--
	03/18/08	6.40	99.92	93.52	2,200	--	--	330	4	4	10	--	--	--	--	--
	08/01/08	7.35	99.92	92.57	5,800	--	--	700	8	19	23	--	--	--	--	--
	04/22/09	5.45	99.92	94.47	2,800	--	--	250	<10	<10	<30	--	--	--	--	--
	05/22/09	5.67	99.92	94.25	1,200	--	--	150	4	4	7	--	--	--	--	--
	06/25/09	6.42	99.92	93.50	3,100	--	--	600	<10	13	<30	--	--	--	--	--
	03/20/15	5.20	99.92	94.72	490	<200	<500	<1.0	<1.0	<1.0	<1.0	<0.01	<1.0	<5.0	--	--
	06/25/15	6.95	99.92	92.97	2,900	<200	<500	<1.0	<1.0	<1.0	<1.0	<0.01	<1.0	<5.0	--	--
	07/29/15	NM	99.92	NM	2,100	<200	<500	<1.0	<1.0	<1.0	<1.0	<0.01	<1.0	<5.0	--	--
	10/08/15	8.80	99.92	91.12	980	630	<500	<1.0	<1.0	<1.0	<1.0	<0.01	<1.0	14	--	--
	12/14/15	5.74	99.92	94.18	100	<200	<500	<1.0	<1.0	<1.0	<1.0	<0.01	<1.0	<5.0	--	--
	03/21/16	4.15	99.92	95.77	2,730	<200	<400	<1.0	<1.0	<1.0	<2.0	<1.0	<1.0	<5.0	--	--
	11/03/16[2]	7.33	99.92	92.59	<100	<200	<500	<1.0	<1.0	<1.0	<1.0	<0.01	<1.0	<5.0	<2	<2
	02/07/17	5.43	99.92	94.49	530	<200	<500	<1.0	<1.0	<1.0	<1.0	<0.01	<1.0	<5.0	<2	<2
	05/08/17	4.54	99.92	95.38	1,300	<200	<500	<1.0	<1.0	<1.0	<1.0	<0.01	<1.0	<5.0	<2	<2
	08/18/17[3]	7.03	99.92	92.89	560	<200	<500	<1.0	<1.0	<1.0	<1.0	<0.01	<1.0	<5.0	--	<2
	11/17/17	7.36	99.92	92.56	220	<200	<500	<1.0	<1.0	<1.0	<1.0	<0.01	<1.0	<5.0	--	<2
	02/09/18	4.73	99.92	95.19	510	<200	<500	1.70	<1.0	<1.0	<1.0	<0.01	<1.0	<5.0	--	<2
	05/11/18	5.46	99.92	94.46	690	<200	<500	1.0	<1.0	<1.0	<1.0	<0.01	<1.0	<5.0	--	<2
	08/16/18	7.74	99.92	92.19	700	<200	<500	<1.0	<1.0	<1.0	<1.0	--	--	--	--	--
		MTCA Method A Cleanup Levels			1,000^	500	500	5	1,000	700	1,000	0.01	5	20	15	15

Table A2: Groundwater Performance Analytical Data Continued

TABLE 2
GROUNDWATER ANALYTICAL RESULTS
Mr. Sudsy Car Wash (PTAP PNW149)
209 Central Avenue South
Kent, Washington 98032

MW6

Well Depth	Sampling Date	Ground Water Level	Elevation (TOC north)	Water Level Elevation	TPHg	TPHd	TPHo	Benzene	Toluene	Ethyl-benzene	Xylenes	EDB	EDC	MTBE	Dissolved Lead	Total Lead
Feet		Feet Below TOC	Feet Above MSL	Feet Above MSL	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L	µg/L
19.7	03/24/04	5.70	99.82	94.12	<100	--	--	<1.0	<1.0	<1.0	<1.0	--	--	--	--	--
	09/29/04	8.07	99.82	91.75	<100	--	--	6	<1.0	<1.0	<1.0	--	--	--	--	--
	12/20/04	7.21	99.82	92.61	<100	--	--	50	<1.0	<1.0	<1.0	--	--	--	--	--
	06/28/05	9.82	99.82	90.00	<100	--	--	53	<1.0	<1.0	<1.0	--	--	--	--	--
	11/23/05	7.85	99.82	91.97	<100	--	--	<1.0	<1.0	<1.0	<1.0	--	--	--	--	--
	02/22/06	4.85	99.82	94.97	<400	--	--	<4.0	<4.0	<4.0	<4.0	--	--	--	--	--
	05/03/06	5.49	99.82	94.33	<100	--	--	<1.0	<1.0	<1.0	<1.0	--	--	--	--	--
	03/18/08	6.27	99.82	93.55	<100	--	--	2	<1.0	<1.0	<3.0	--	--	--	--	--
	08/01/08	7.21	99.82	92.61	<100	--	--	4	<1.0	<1.0	<3.0	--	--	--	--	--
	04/22/09	5.25	99.82	94.57	<100	--	--	<1.0	<1.0	<1.0	<3.0	--	--	--	--	--
	05/22/09	5.57	99.82	94.25	<100	--	--	<1.0	<1.0	<1.0	<3.0	--	--	--	--	--
	06/25/09	6.30	99.92	93.62	<100	--	--	<1.0	<1.0	<1.0	<3.0	--	--	--	--	--
	03/20/15	5.20	99.82	94.62	<100	<200	<500	<1.0	<1.0	<1.0	<1.0	<0.01	<1.0	<5.0	--	--
	06/25/15	6.80	99.82	93.02	<100	<200	<500	<1.0	<1.0	<1.0	<1.0	<0.01	<1.0	<5.0	--	--
	10/08/15	8.64	99.82	91.18	<100	<200	<500	<1.0	<1.0	<1.0	<1.0	<0.01	<1.0	<5.0	--	--
	12/14/15	5.58	99.82	94.24	<100	<200	<500	<1.0	<1.0	<1.0	<1.0	<0.01	<1.0	<5.0	--	--
	03/21/16	4.10	99.82	95.72	<100	<200	<400	<1.0	<1.0	<1.0	<2.0	<1.0	<1.0	<5.0	--	--
	11/03/16	7.19	99.82	92.63	<100	<200	<500	<1.0	<1.0	<1.0	<1.0	<0.01	<1.0	<5.0	<2	<2
	02/07/17	5.29	99.82	94.53	160	<200	<500	<1.0	<1.0	<1.0	<1.0	<0.01	<1.0	<5.0	<2	<2
	05/08/17	4.44	99.82	95.39	<100	<200	<500	<1.0	<1.0	<1.0	<1.0	<0.01	<1.0	<5.0	<2	<2
	08/18/17	6.92	99.82	92.90	<100	<200	<500	<1.0	<1.0	<1.0	<1.0	<0.01	<1.0	<5.0	--	<2
	11/17/17	7.23	99.82	92.59	<100	<200	<500	<1.0	<1.0	<1.0	<1.0	<0.01	<1.0	<5.0	--	<2
	02/09/18	4.63	99.82	95.19	<100	<200	<500	<1.0	<1.0	<1.0	<1.0	--	--	--	--	<2
	05/11/18	5.35	99.82	94.47	<100	<200	<500	<1.0	<1.0	<1.0	<1.0	--	--	--	--	<2
	08/16/18	7.60	99.82	92.22	--	--	--	--	--	--	--	--	--	--	--	--
		MTCA Method A Cleanup Levels			1,000^	500	500	5	1,000	700	1,000	0.01	5	20	15	15

EXPLANATION
MTCA = Model Toxic Control Act Cleanup Level (WAC173-340-900)
TOC = Top of Casing MSL = Mean Sea Level < = not detected at indicated Laboratory Detection Limits -- not analyzed NM = Not Measured
TPHg - Total Petroleum Hydrocarbons - Gasoline by Method NWTPH-Gx
TPHd - Total Petroleum Hydrocarbons - Diesel by Method NWTPH-Dx
TPHo - Total Petroleum Hydrocarbons - Motor Oil by Method NWTPH-Dx extended
Benzene, Toluene, Ethylbenzene and Xylenes by EPA Method 8021B
MTBE = Methyl-tert-butyl-ether EDC = 1,2-Dichloroethane EDB = 1,2-Dibromoethane; by EPA Method 8260B
Total and Dissolved Lead by EPA Method 7010 * = Dissolved Lead by EPA Method 200.8
^ = This value can only be used if no benzene is present in the soil at the site and the total of ethylbenzene, toluene and xylene do not exceed 1% of the gasoline mixture
Bolded numbers and red-shaded cells denote concentrations above the MTCA Method A Cleanup Levels for groundwater
1 = Sampled in between quarterly events to confirm TPHg concentration trend
2 = Aerotech conducted a targeted injection of in-situ chemical oxidation solution in to MW5 on September 9, 2016
3 = Aerotech conducted a targeted injection of in-situ chemical oxidation solution in to MW5 on June 6, 2017