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July 18, 2019

Mr. Ed Jones, Project Manager Washington State Department of Ecology 3190 160th Avenue Southeast Bellevue, Washington 98008-5452

RE: PROGRESS REPORT, APRIL THROUGH JUNE 2019
REMEDIAL INVESTIGATION MONITORING AND FEASIBILITY STUDY
CAPITAL INDUSTRIES, INC.
5801 THIRD AVENUE SOUTH, SEATTLE, WASHINGTON
AGREED ORDER NO. DE 10402
FARALLON PN: 457-008

Dear Mr. Jones:

Farallon Consulting, L.L.C. (Farallon) has prepared this progress report on behalf of Capital Industries, Inc. (CI) to summarize the activities conducted during the second quarter of 2019, April through June, as part of the ongoing remedial investigation monitoring and feasibility study being conducted at the CI facility at 5801 3rd Avenue South in Seattle, Washington (herein referred to as the CI Site). This progress report has been prepared in accordance with Agreed Order No. DE 10402 dated April 23, 2014, entered into by potentially liable persons that include CI; Art Brass Plating, Inc.; Blaser Die Casting Co.; and PSC Environmental Services, LLC (Burlington Environmental, LLC is a wholly owned subsidiary of PSC Environmental Services, LLC, which is a wholly owned subsidiary of Stericycle Environmental Solutions, Inc.); and by the Washington State Department of Ecology (Ecology) (Agreed Order). CI and the other potentially liable persons listed above are collectively referred to as the West of 4th Group. The West of 4th Group Site under the Agreed Order consists of Site Unit 1 (SU1) and Site Unit 2 (SU2) as depicted on the figure presented in Attachment A. The CI Site is located in SU2.

ACTIVITIES DURING REPORTING PERIOD

Activities completed during this progress reporting period included:

- Continuing operation of vapor intrusion mitigation subslab depressurization systems (SSDSs) at the Pacific Foods Systems North Building at 5815 4th Avenue South and the Natus Medical Facility at 5900 First Avenue South in Seattle, Washington;¹
- Processing data from the semiannual groundwater monitoring and sampling event conducted in March 2019 (Attachment B);
- Processing data from air samples collected from the SSDS at the Pacific Food Systems North Building in March 2019 (Attachment C);

¹ The Natus Medical Facility at 5900 First Avenue South in Seattle, Washington was previously known as the Olympic Medical Facility.



- Processing data from air samples collected from the SSDS at the Natus Medical Facility in March 2019 (Attachment D);
- Submitting the Final Capital Industries Plant 4 Soil Vapor Extraction Pilot Study Work Plan, West of 4th Group Site, Capital Industries, Inc., 5801 3rd Avenue South, Seattle, Washington dated May 21, 2019, prepared by Farallon (SVE Pilot Study Work Plan); and
- Conducting the soil vapor extraction (SVE) pilot study at CI Plant 4.

These activities are summarized in the sections that follow.

GROUNDWATER MONITORING AND SAMPLING

Groundwater monitoring and sampling was performed during the week of March 18, 2019 in accordance with the technical memorandum regarding FINAL West of 4th Groundwater Monitoring Program Plan, 2017 through Draft Cleanup Action Plan, W4 Joint Deliverable, Agreed Order No. DE 10402 dated March 21, 2017, from Ms. Janet Knox of Pacific Groundwater Group to Mr. Jones of Ecology. Groundwater elevation data were collected at SU1 and SU2 monitoring wells on March 21, 2019. Groundwater samples were collected from monitoring wells scheduled for sampling and analyzed for chlorinated volatile organic compounds. Groundwater samples from select monitoring wells also were analyzed for natural attenuation parameters, including nitrate, ferrous iron, sulfate, methane, total organic carbon, and ethane/ethene. Groundwater analytical results were similar to previous sampling events. The groundwater data are included on summary figures provided in Attachment B.

VAPOR INTRUSION MITIGATION

The SSDSs at the Pacific Food Systems North Building and the Natus Medical Facility operated continuously during the second quarter of 2019. Farallon evaluated the influent and ambient air monitoring results from the Pacific Food Systems North Building and Natus Medical Facility in March 2019, which are summarized in Table 1 and Figure 1, in Attachment C; and in Table 2 and Figure 1, in Attachment D.

Pacific Food Systems North Building

Tetrachloroethene (PCE) was detected at a concentration of 702 micrograms per cubic meter ($\mu g/m^3$) in indoor ambient air sample IA-9 in the central office in the Pacific Food Systems North Building (Table 1 and Figure 1, Attachment C). This analytical result is higher than the SSDS system influent concentration of 148 $\mu g/m^3$ for PCE, and the SSDS was operating at the time of the sampling event. The door to the central office was closed during sampling and it is believed that one or more chemicals stored inside the closed office was the cause of the elevated PCE detection. Farallon notified the owner and tenant of the Pacific Food Systems North Building of the unusually high analytical result and that the source appeared to be associated with something in the office rather than from the subsurface. Farallon recommended that the door to the office remain open to improve ventilation and reduce potential risk to workers. The PCE concentrations for the remaining indoor ambient air samples were less than the inhalation pathway interim measure action level.



Trichloroethene (TCE) concentrations remain relatively consistent for the indoor ambient air samples and continue to exceed the target cleanup levels for protection of indoor air quality (Table 1, Attachment C). Operations of the SSDS have been optimal and evaluation of depressurization of the slab indicated that a vapor intrusion condition should not exist. While both PCE and TCE have periodically been detected in outdoor ambient air, the potential contribution is not significant enough to explain the levels of PCE and TCE detected in indoor ambient air. The historical data continues to suggest that an unknown indoor air source is contributing to PCE and TCE detections. Continued monitoring of the SSDS operations to ensure PCE and TCE associated with potential subsurface sources are mitigated will continue on a quarterly basis.

Natus Medical Facility

TCE was detected at a concentration of $6.08 \,\mu\text{g/m}^3$ in indoor ambient air sample IA-3 collected from the warehouse at the Natus Medical Facility (Table 2 and Figure 1, Attachment D). This analytical result is greater than the inhalation pathway interim measure action level. A similar spike in the TCE concentration was noted in March 2018 in the same area of the warehouse. The results of a subsequent sampling event conducted in August 2018 indicated that TCE was detected at concentrations less than the laboratory reporting limit. Farallon is evaluating whether the spikes in TCE concentrations in March 2018 and 2019 are associated with events inside the building or subsurface conditions.

The preliminary evaluation that includes information currently available included:

- Evaluation of known chemicals and activities in this portion of the warehouse;
- Evaluation of TCE trends in groundwater;
- Evaluation of the sampling methods/data; and
- Evaluation of the SSDS performance.

Farallon reviewed the conditions noted during the 2018/2019 sampling events to identify potential activities or chemical product use that could explain the diversity of analytical results. No specific sources of PCE or TCE were identified during the sampling events. Farallon is not present throughout the 8-hour sampling duration; therefore, potential activities in the warehouse that could affect the sampling may not be easily documented.

Groundwater trends have indicated that TCE concentrations for monitoring well MW-3, located upgradient of the building, and monitoring well MW-10, located immediately south of the building, have been consistent (Attachment B). PCE has not been detected in groundwater, yet has consistently been present in the indoor and outdoor ambient air samples and the SSDS influent soil gas being extracted from beneath the building. The source of PCE in soil gas and air remain unknown since there is no known groundwater source at CI Plants 1, 2, or 5, or at other nearby facilities. At this time, the groundwater data does not indicate that the TCE fluctuations in ambient air are associated with groundwater conditions.



The sampling methods and laboratory data were evaluated. Sampling was conducted in accordance with standard protocols and with the exception of the outdoor air sample collected in March 2019, which was disturbed by a passerby and required relocation, no unusual circumstances that would affect the sample integrity were noted. The laboratory data evaluation indicated that the data appears valid for the 2018/2019 sampling events. Outdoor ambient air samples have been inconsistent but also have had PCE and TCE detections, suggesting outdoor ambient air being exchanged with indoor ambient air by the heating ventilation and cooling systems and during times when doors/windows are open is contributing PCE and/or TCE to indoor ambient air. However, based on the concentrations of PCE and TCE detected in outdoor ambient air, the potential contribution is not significant enough to fully account for the elevated TCE concentrations present in the northeast portion of the building.

The SSDS operated continuously and with no known anomalous operational conditions that should prevent mitigation of a vapor intrusion condition from TCE volatilizing from the underlying groundwater plume. The SSDS influent results for soil gas being extracted from beneath the building slab has indicated the presence of PCE, TCE, and dichloroethene isomers (Table 2, Attachment D). The TCE concentrations extracted by the SSDS are less than those detected in indoor ambient air during both the March 2018 and March 2019 sampling events for the samples collected at the northeastern portion of the warehouse. The results demonstrate that the SSDS is capturing PCE and TCE present beneath the building slab. Therefore, a vapor intrusion condition should not exist within the building. Historically, the SSDS had been effectively mitigating vapor intrusion conditions. Therefore, the SSDS performance does not appear to be a contributing factor to the detections of elevated TCE in indoor ambient air.

Evaluation of the potential source(s) of PCE and TCE in both outdoor and indoor ambient air will continue. The SSDS performance will be monitored quarterly and Farallon will continue to communicate with building personnel to ensure any changes in operations are conveyed to Farallon so we can better understand the nature of the TCE in ambient air. At this time, the elevated TCE is concluded to be associated with unknown activities conducted inside the building.

FEASIBILITY STUDY REPORT

A pilot study is being conducted at SU1, and an interim action pilot study to evaluate SVE was conducted at CI Plant 4 in SU2.

INTERIM MEASURES

Farallon submitted the SVE Pilot Study Work Plan to Ecology summarizing the final elements of the SVE pilot study. The SVE pilot study was conducted on June 8 and 9, 2019. Farallon provided the draft results of the SVE pilot study to Ecology on July 12, 2019 and is coordinating a follow-up meeting to discuss the results of the SVE pilot study with Ecology during the week of July 22, 2019.

PUBLIC COMMUNICATIONS

No public communication activities were completed by CI during this period.



ANTICIPATED WORK IN THE NEXT QUARTER

Work anticipated to be performed during the third quarter of 2019, July through September, is summarized below.

FEASIBILITY STUDY WORK

Continued interim action work at CI Plant 4 is the only feasibility study (FS)-related work anticipated for the second quarter of 2019 and is expected to continue throughout 2019. In 2020, following completion of the SU1 pilot study and confirmation that SVE can be applied as an interim action at CI Plant 4, an addendum to the FS reports will be prepared, and a final remedial alternative will be proposed for Ecology approval.

INTERIM MEASURES

Farallon is preparing materials for a meeting with Ecology in July to discuss the results of the SVE pilot study at CI Plant 4. The results of the meeting will determine whether SVE will be selected as the preferred soil cleanup technology for the forthcoming FS revisions and when it will be implemented as an interim action.

GROUNDWATER MONITORING AND SAMPLING

A groundwater monitoring and sampling event will be conducted in September 2019. The purpose of the ongoing groundwater monitoring is to evaluate the stability of the plumes, monitor the ongoing natural attenuation processes to refine the time frame for achieving cleanup levels, evaluate existing and potential vapor intrusion risk, and provide data to refine evaluation of the cleanup alternatives presented in the FS.

PUBLIC COMMUNICATIONS

The project website (http://www.farallonconsulting.com/457-capital-industries) will be updated with an electronic copy of this progress report.

The next progress report will summarize activities completed from July through September 2019, and will be submitted on or before October 7, 2019.



CLOSING

Farallon trusts that this quarterly progress report provides sufficient information for Ecology needs. If you have questions regarding this project, please contact either of the undersigned at (425) 295-0800.

Sincerely,

Farallon Consulting, L.L.C.

fh. Moor

Jennifer L. Moore Senior Scientist Jeffrey Kaspar, L.G., L.H.G.

Principal Geologist

Attachments: Attachment A, Site Diagram

Attachment B, Groundwater Data Figures

Attachment C, Subslab Depressurization System Analytical Results – Pacific Food

Systems – North Building

Attachment D, Subslab Depressurization System Analytical Results – Natus

Medical Building

cc: Ron Taylor, Capital Industries, Inc.

Donald Verfurth, Gordon and Rees, L.L.P.

Eva Sabo, Gordon and Rees, L.L.P.

Kenneth Luther, Chubb Group of Insurance Companies

Alborz Wozniak, Veritas Environmental Consulting, Inc.

Peter J. Mintzer, Selman Breitman LLP

Erika Lewis, Zurich Insurance Group

Robert Plotz, The Travelers Companies

Jane E. Kelly, The Travelers Companies

Email with link to electronic copy on project website:

Janet Knox, Pacific Groundwater Group

Dana Cannon, Aspect Consulting

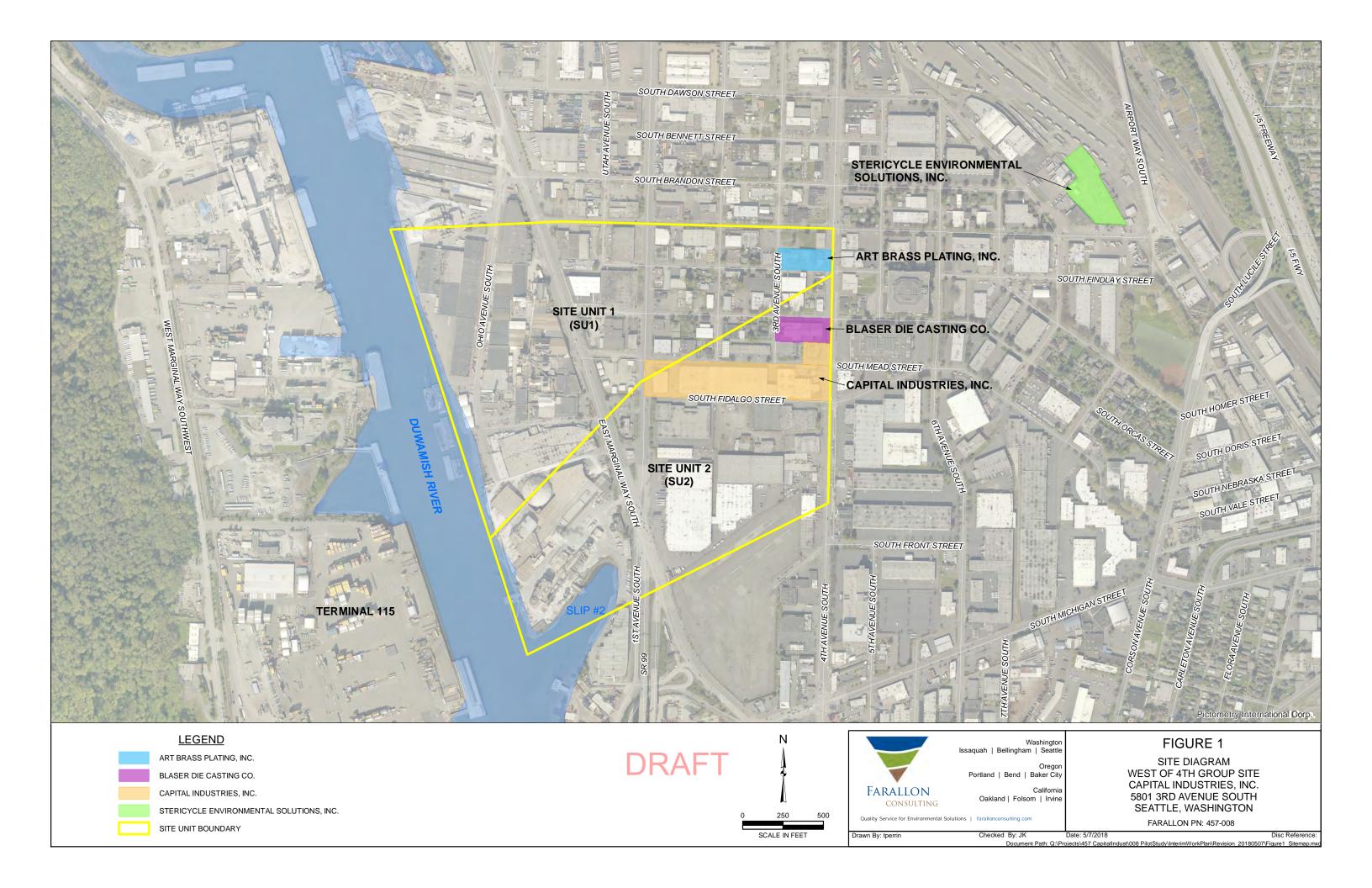
Bill Carroll, Arrow Environmental

Bill Beck, PSC Environmental Services, LLC

JM/JK:cm

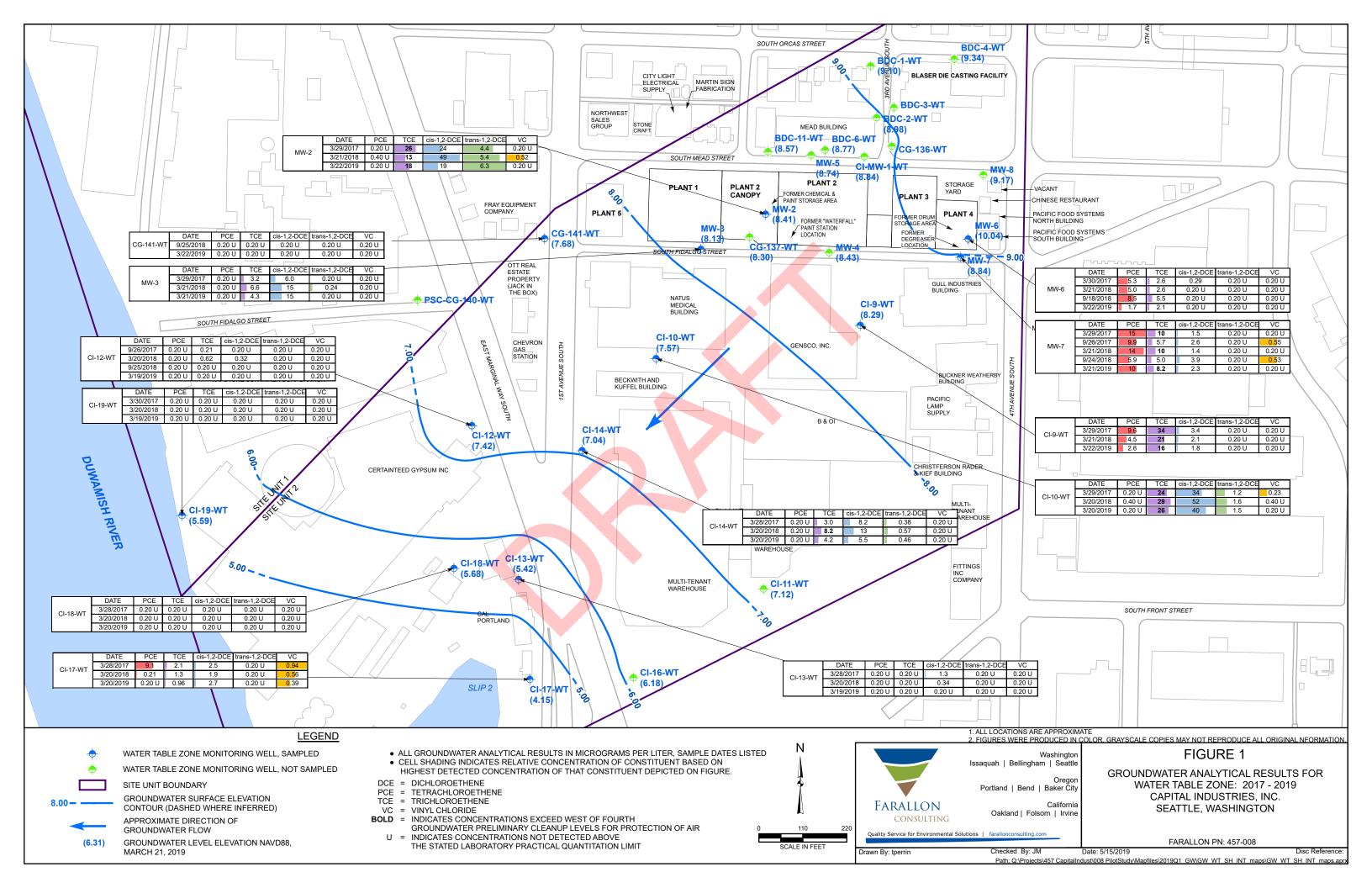
ATTACHMENT A SITE DIAGRAM

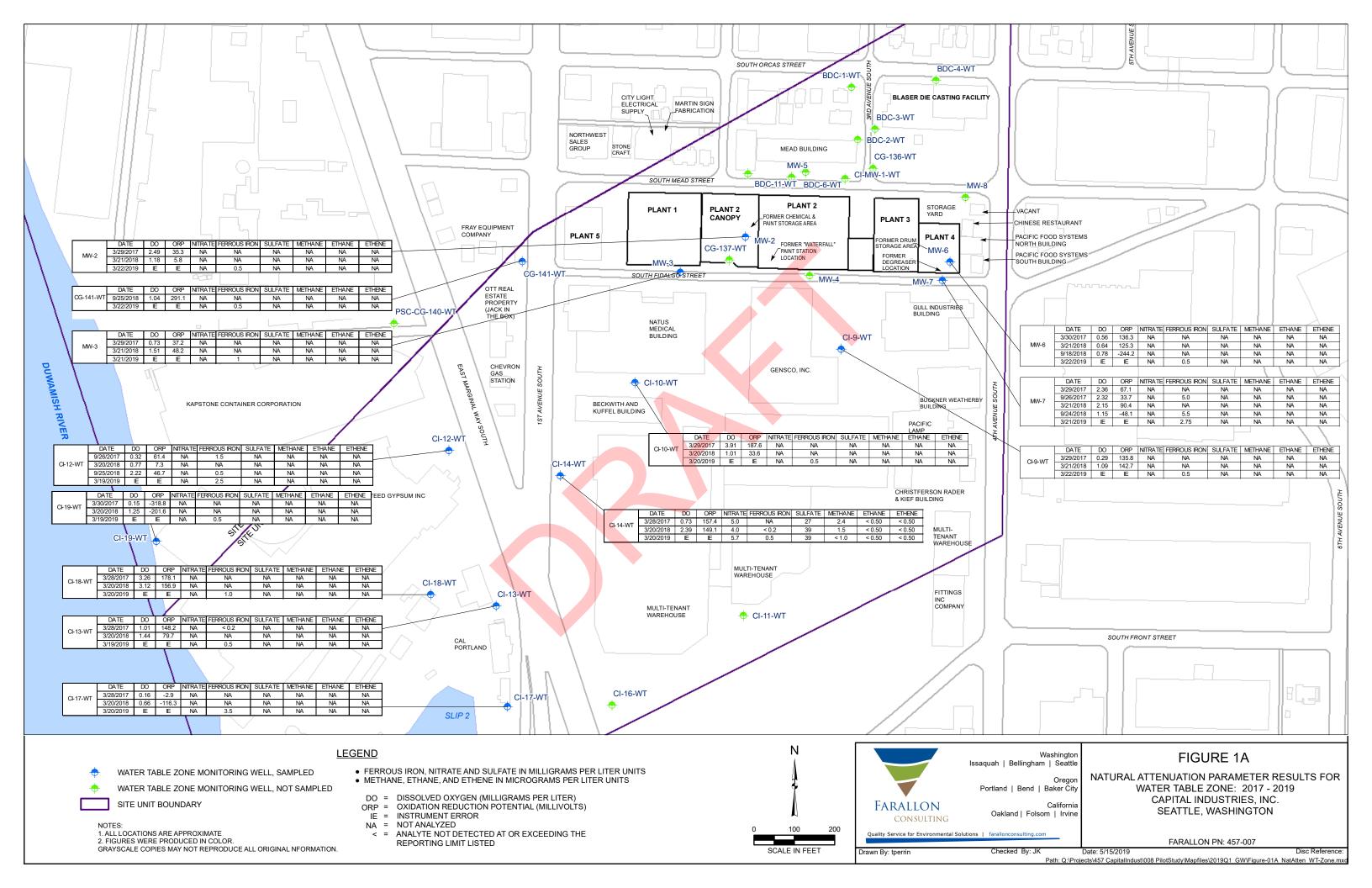
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Seattle, Washington

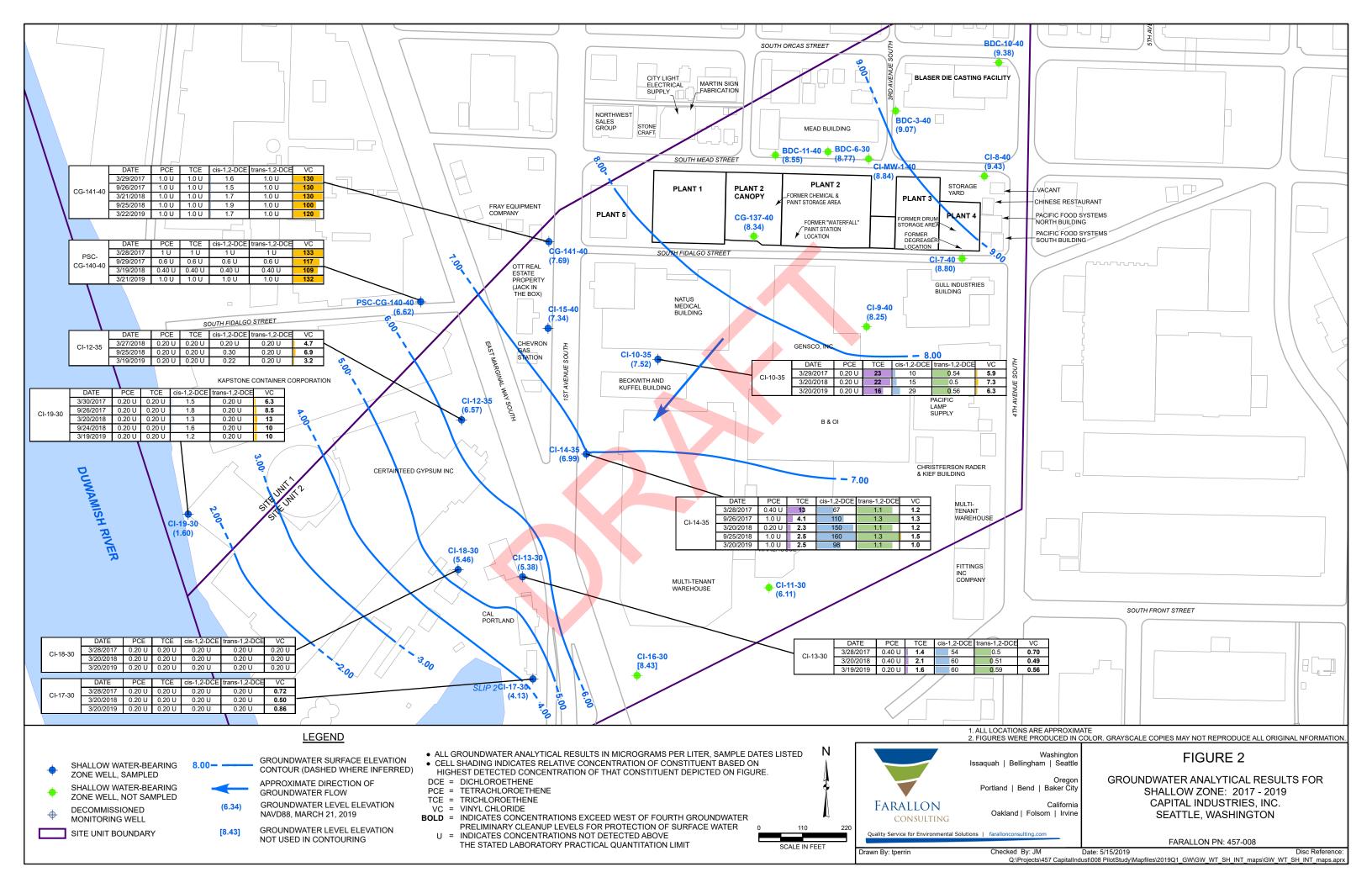


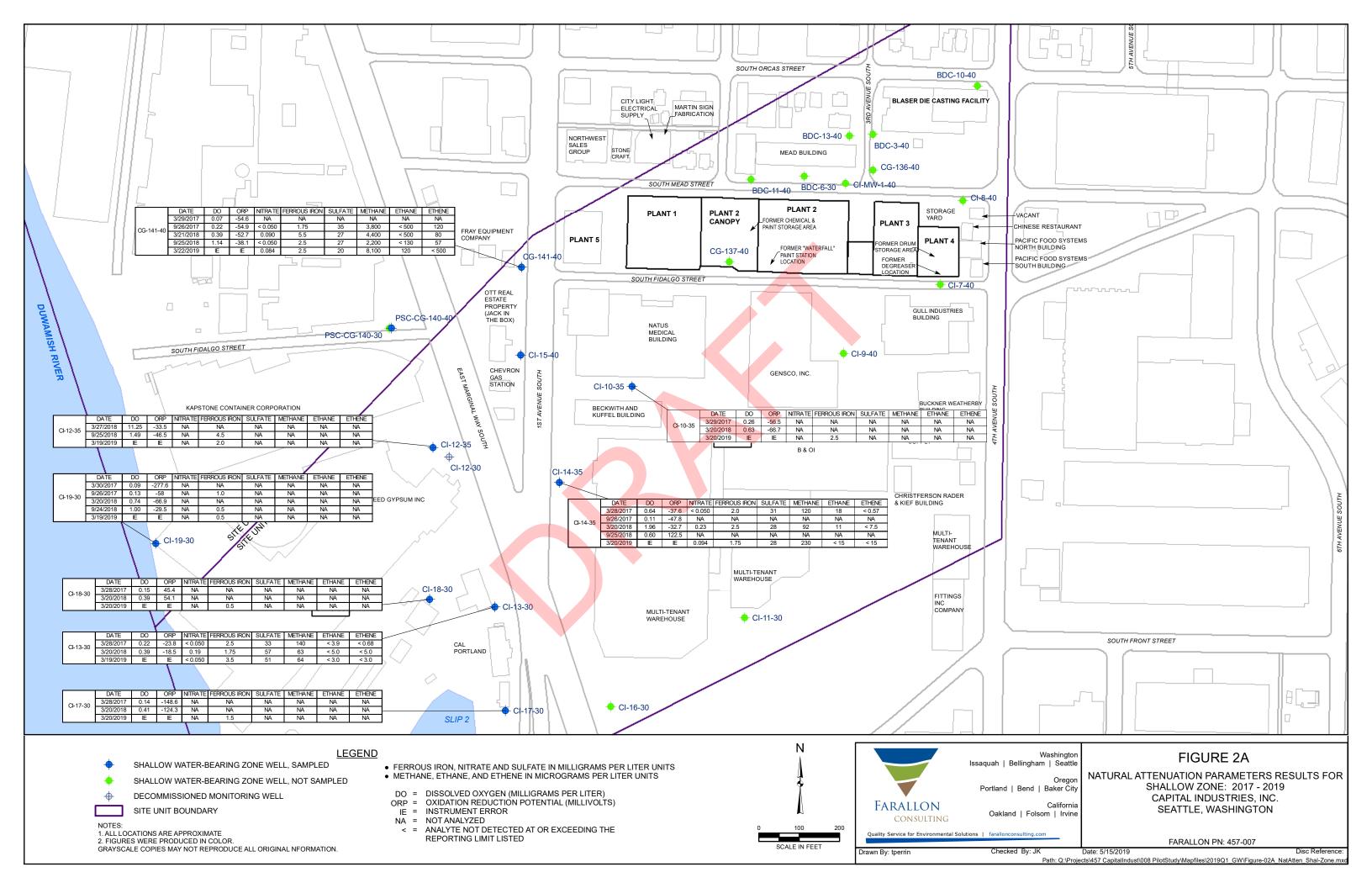
ATTACHMENT B GROUNDWATER DATA FIGURES

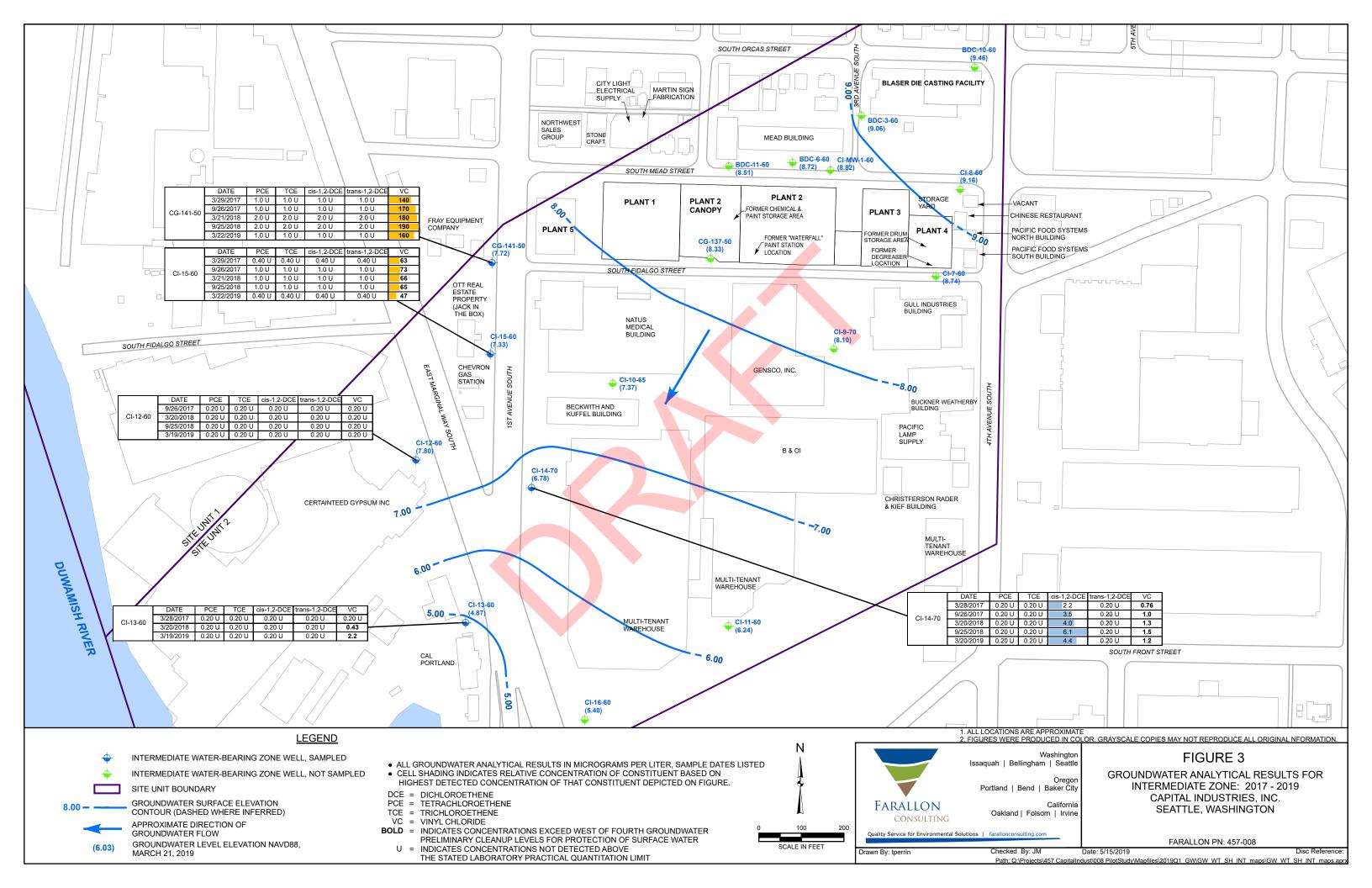
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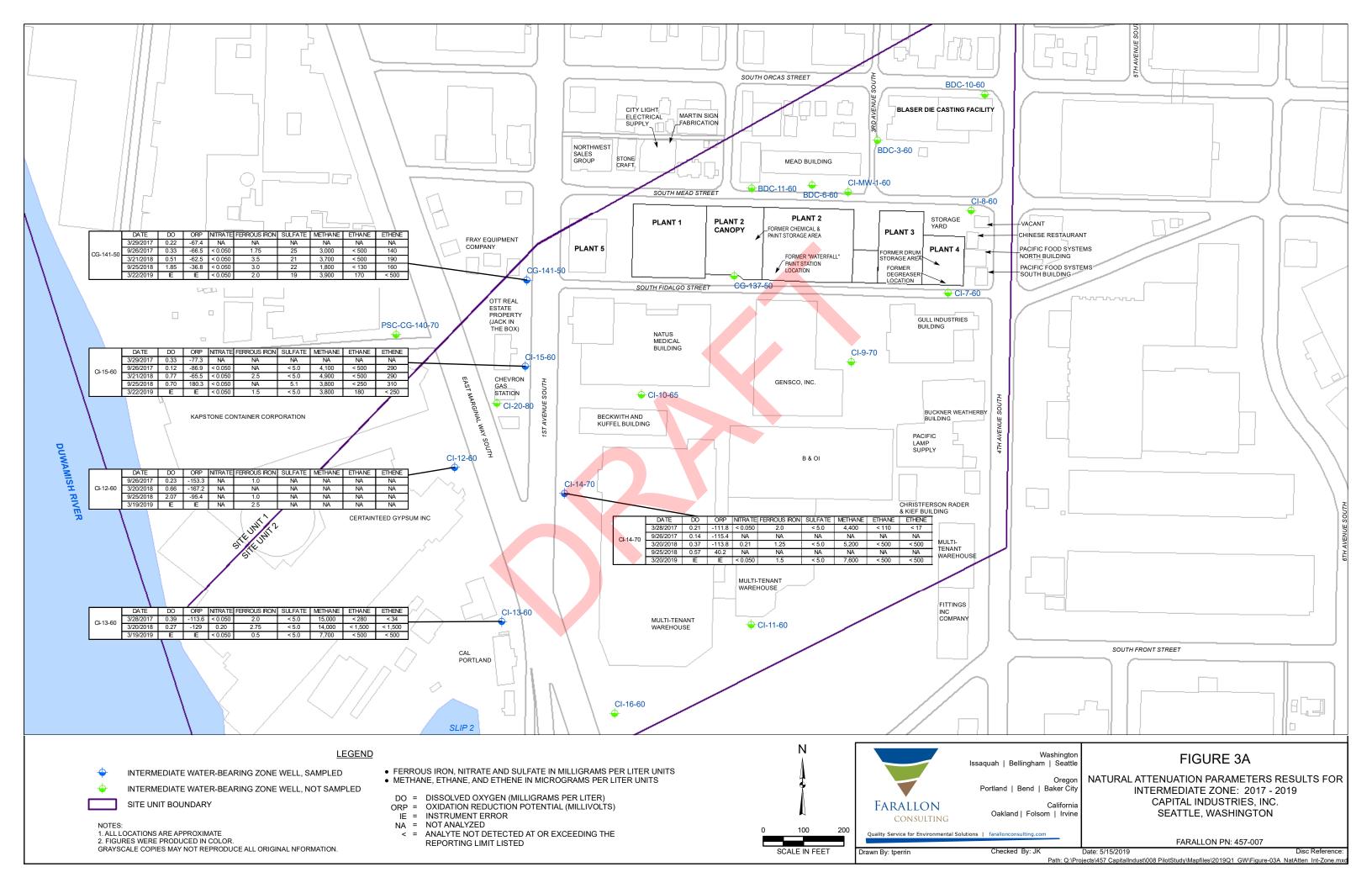












ATTACHMENT C SUBSLAB DEPRESSURIZATION SYSTEM ANALYTICAL RESULTS – PACIFIC FOOD SYSTEMS – NORTH BUILDING

PROGRESS REPORT, APRIL THROUGH JUNE 2019
Capital Industries, Inc.
5801 Third Avenue South
Seattle, Washington

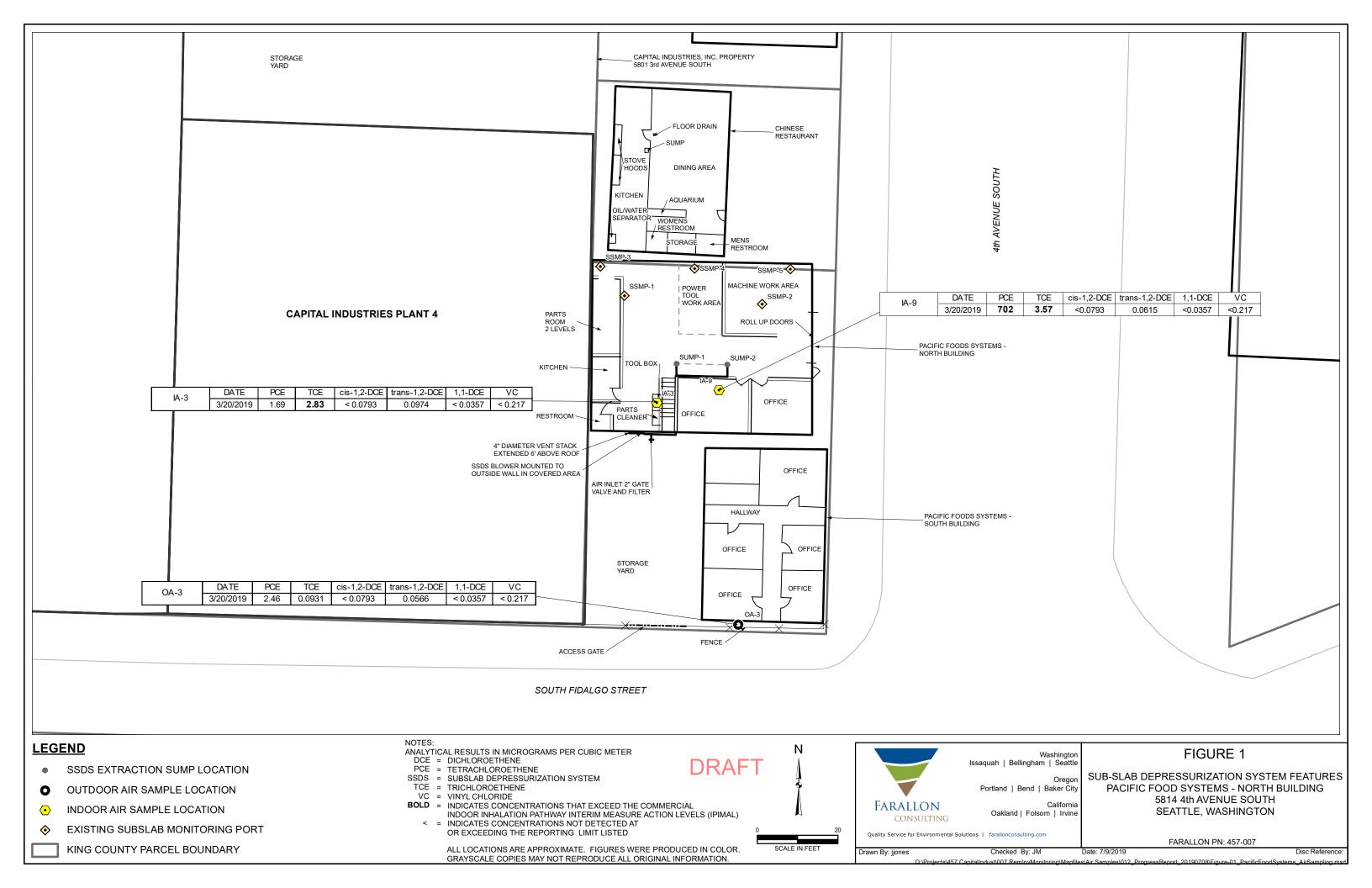


Table 1 Summary of Air Quality Monitoring Results Pacific Food Systems, Inc. North Building Seattle, Washington

Analytical Results (microgra						ograms per cubic	rams per cubic meter)			
Sample Type	Sample Location	Location Description	Sample Identification	Sample Date	PCE ¹	TCE ¹	cis-1,2- Dichloroethene ¹	trans-1,2- Dichloroethene ¹	1,1- Dichloroethene ¹	Vinyl Chloride ¹
Subslab	SS-2	Western side of Pacific Food Systems North Building Shop Area	5815N-Warehouse1-041311	4/13/2011	840	1,400	74	<1.4	<0.68	<0.44
	SS-3	Central part of Pacific Food Systems North Building Shop Area	5815N-Warehouse2-041311	4/13/2011	4,200	28,000	<42	<42	<42	<27
	IA-3/ PacN_Shop_W	Western side of Pacific Food Systems North Building Shop Area	FAR-36029-022112	2/21/2012	1.5	4.4	0.98	< 0.67	< 0.067	< 0.043
			IA-3-1565-032013	3/20/2013	1.6	7.0	1.6	< 0.68	< 0.068	< 0.044
			IA6-22497-060115	6/1/2015	0.39	2.0	<0.12	< 0.63	< 0.063	< 0.040
			IA5-15899-113015	11/30/2015	0.534	0.971	< 0.0793	< 0.0238	< 0.0357	< 0.217
			IA2-1042616-Warehouse	4/26/2016	0.61	4.68	< 0.0793	< 0.0238	NA	< 0.217
			IA2-083116-Warehouse	8/31/2016	0.475	2.15	< 0.0793	< 0.0238	< 0.0357	< 0.217
			IA2-010517-Warehouse	1/5/2017	0.905	2.95	0.201	< 0.0238	< 0.0357	< 0.217
			IA-2-033017	3/30/2017	< 0.339	1.51	< 0.0793	< 0.0238	< 0.0357	< 0.217
			IA-3-15901-032019	3/20/2019	1.69 B	2.83	< 0.0793	0.0974	< 0.0357	< 0.217
	IA-4/ PacN_Office	I North Ruilding Front I	FAR-25243-022112	2/21/2012	0.60	1.9	0.32	< 0.68	< 0.068	< 0.044
Indoor Air			IA-4-34193-032013	3/20/2013	0.66	2.4	0.43	< 0.67	< 0.067	< 0.043
			IA7-34758-060115	6/1/2015	1.1	1.9	< 0.12	< 0.62	< 0.062	< 0.040
			IA4-17646-113015	11/30/2015	0.606	0.938	< 0.0793	< 0.0238	< 0.0357	< 0.217
			IA1-1042616-Office	4/26/2016	0.475	4.84	< 0.0793	< 0.0238	NA	< 0.217
			IA1-083116-Office	8/31/2016	0.475	2.26	< 0.0793	< 0.0238	< 0.0357	< 0.217
			IA2-010517-Office	1/5/2017	0.585	39.5	< 0.0793	< 0.0238	< 0.0357	< 0.217
			IA-1-033017	3/30/2017	0.351	3.42	< 0.0793	< 0.0238	< 0.0357	< 0.217
	IA-5	Pacific Food Systems North Building Parts Cleaner Area in Shop	IA-5-13844-042414	4/24/2014	1.1	3.4	0.49	< 0.65	< 0.065	< 0.042
	IA-6		IA-6-33970-050514	5/5/2014	0.95	3.6	0.34	< 0.65	< 0.065	< 0.042
	IA-9	Pacific Food Systems North Building Central Office Proximate to Door	IA-2-17244-032019	3/20/2019	702 B,E	3.57	<0.0793	0.0615	<0.0357	<0.217

Table 1 Summary of Air Quality Monitoring Results Pacific Food Systems, Inc. North Building

Seattle, Washington Farallon PN: 457-008

						Analy	tical Results (micrograms per cubic meter)			
Sample Type	Sample Location	Location Description	Sample Identification	Sample Date	PCE ¹	TCE ¹	cis-1,2- Dichloroethene ¹	trans-1,2- Dichloroethene ¹	1,1- Dichloroethene ¹	Vinyl Chloride ¹
Outdoor Air	OA-1	Outside south of Pacific Food Systems South Building	FAR-5659-022112	2/21/2012	<0.22	< 0.17	< 0.13	< 0.64	< 0.064	< 0.041
			OA-1-35995-032013	3/20/2013	< 0.23	<0.18	< 0.13	< 0.66	< 0.066	< 0.043
	OA-2/ Pac_Out_S_Pole	Outside Pacific Food Systems South Building at southeastern corner on telephone pole	OA-2-34748-040214	4/24/2014	< 0.21	0.27	< 0.12	< 0.61	< 0.061	< 0.039
			AA3-96113-060115	6/1/2015	<0.21	2.9	< 0.12	< 0.61	< 0.061	< 0.039
			AA1-042616-UW	4/26/2016	< 0.339	14.8	< 0.0793	< 0.0238	NA	< 0.217
			OA1-010517-UW	1/5/2017	0.573	4.96	< 0.0793	< 0.0238	< 0.0357	< 0.217
	OA-3	Outside South of Pacific Food Systems South Building	OA-3-15422-032019	3/20/2019	2.46 B	0.0931	< 0.0793	0.0566	< 0.0357	< 0.217
	Pac_Out_E_Pole	Outside east of Pacific Food Systems buildings on telephone pole	AA1-15423-113015	11/30/2015	< 0.339	< 0.0914	< 0.0793	< 0.0238	< 0.0357	< 0.217
			AA1-083116-DO	8/31/2016	< 0.339	< 0.0914	< 0.0793	< 0.038	< 0.0357	< 0.217
			OA-1-033017	3/30/2017	< 0.339	< 0.0914	< 0.0793	< 0.0238	< 0.357	< 0.217
SSDS	SSDS Influent	SSDS Influent sample port	SYSTEMINFLUENT-042616	4/26/2016	170	243	12.9	0.238	NA	< 0.217
			SYSTEM-083116	8/31/2016	497	482	23.9	0.278	< 0.0357	< 0.217
			PFS-Influent-010517	1/5/2017	153	266	5.95	0.211	< 0.0357	< 0.217
			PFS-Influent-033017	3/30/2017	138	169	9.95	0.264	< 0.0357	< 0.217
			PFS-INF-17637-032019	3/20/2019	148 B,E	219	3.14	0.154	< 0.0357	< 0.217
Commercial Indoor Air IPIMAL - Cancer ²				22	1.5	Not Applicable ³	Not Applicable ³	Not Applicable ³	0.66	
Commercial Indoor Air IPIMAL - Non-cancer ²				7.5	0.39		12	39	19	

NOTES:

Results in **bold** denote concentrations exceeding an IPIMAL.

Green-highlighted rows represent March 20, 2019 analytical data.

IPIMAL = inhalation pathway interim measure action level

B - Analyte detected in the associated Method Blank

E - Value above quantitation range

NA = not analyzed

Pacific Food Systems = Pacific Food Systems, Inc.

 $\label{eq:pce} PCE = tetrachloroethene$

 $SSDS = subslab\ depressurization\ system$

TCE = trichloroethene

 $\label{eq:VIRLS} VIRLS = vapor\ intrusion\ remediation\ levels$

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

¹ Samples analyzed by U.S. Environmental Protection Agency (EPA) Method Modified TO-15 Selective Ion Mode.

² Interim action levels presented from Updated Air and Groundwater IPIMALS/VIRLs for Residential and Commercial Scenarios for the Georgetown Site dated October 19, 2012. Note that only compounds representing a vapor intrusion risk are listed.

³ "Not Applicable" is used where the constituent of concern will not affect the medium of potential concern due to an incomplete pathway or no pertinent standard exists.

ATTACHMENT D SUBSLAB DEPRESSURIZATION SYSTEM ANALYTICAL RESULTS – NATUS MEDICAL BUILDING

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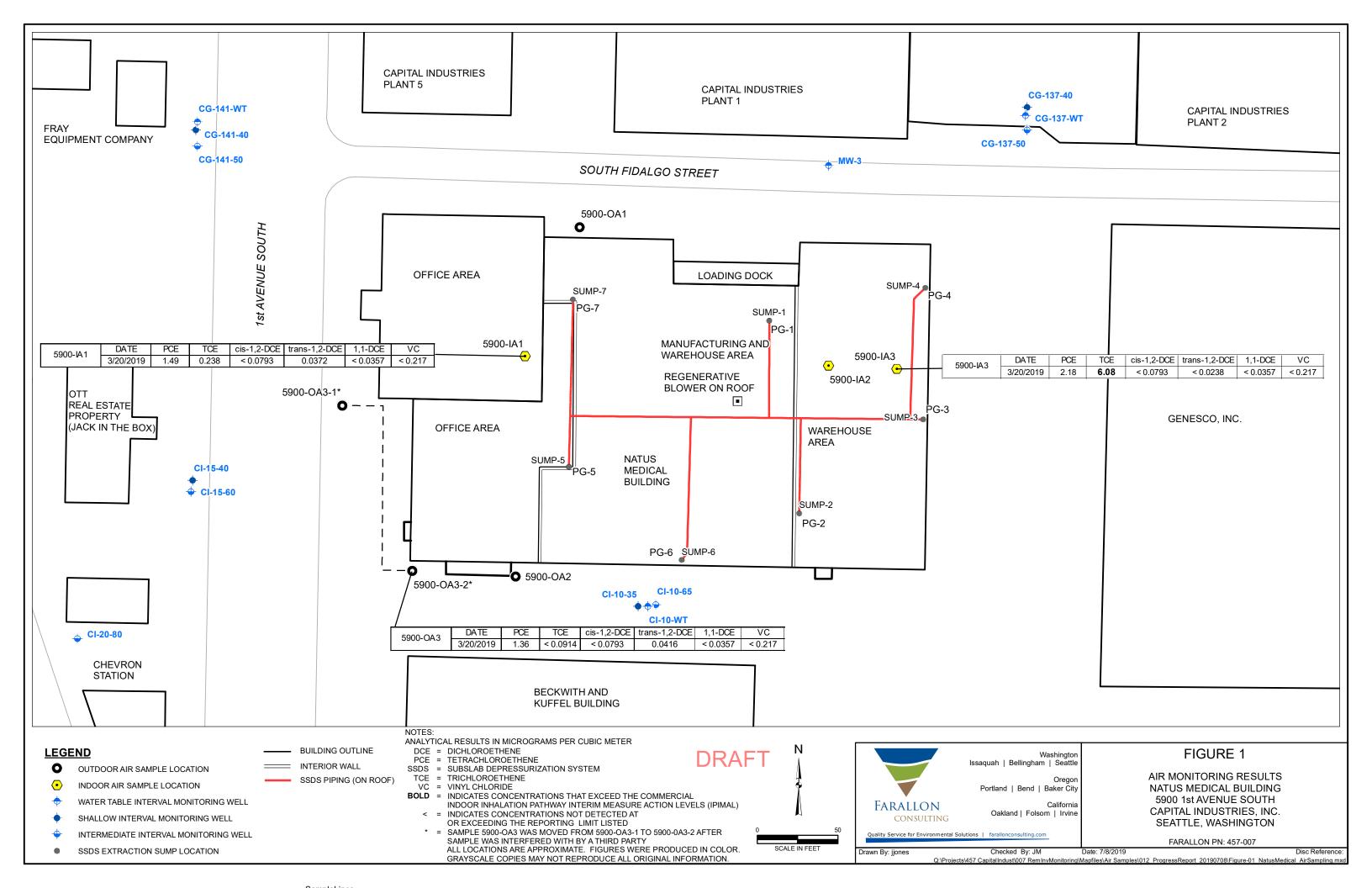


Table 2

Summary of Soil Gas and Air Sampling Analytical Results Natus (Formerly Olympic) Medical Facility 5900 First Avenue South Seattle, Washington

Farallon PN: 457-008

	Analytical Results (micrograms per cubic me						meter)			
Sample Type	Sample Location	Location Description	Sample Identification	Sample Date	PCE ¹	TCE ¹	cis-1,2- Dichloroethene ¹	trans-1,2- Dichloroethene ¹	1,1- Dichloroethene ¹	Vinyl Chloride ¹
	5900-IA1	Building Main Office	IA8-33937-060215	6/2/2015	< 0.22	< 0.17	< 0.13	< 0.63	< 0.063	< 0.041
			NATUS-OFFICE-032118	3/21/2018	0.882	1.11	< 0.0793	< 0.0238	< 0.0357	< 0.217
			5900-IA1-10945-032019	3/20/2019	1.49	0.238	< 0.0793	0.0372	< 0.0357	< 0.217
Indoor Air	5900-IA2	Building Shipping Office	IA9-34348-060215	6/2/2015	< 0.21	< 0.17	< 0.12	< 0.62	< 0.062	< 0.040
	5900-IA3	Building Warehouse	NATUS-WAREHOUSE-032118	3/21/2018	0.583	25.3	< 0.0793	0.102	0.117	0.261
			NATUS-5900-IA3-080218	8/2/2018	< 0.339	< 0.0914	< 0.0793	< 0.0238	< 0.0357	< 0.217
			5900-IA3-15893-032019	3/20/2019	2.18	6.08	< 0.0793	< 0.0238	< 0.0357	< 0.217
	5900-OA1	Outside north of the Building on a telephone pole	AA4-34322-060215	6/2/2015	< 0.21	< 0.16	< 0.12	< 0.61	< 0.061	< 0.039
	5900-OA2	Outside south of the Building on the western side	NATUS-UPWIND-032118	3/21/2018	0.600	0.430	< 0.0793	< 0.0238	< 0.0357	< 0.217
Outdoor Air			NATUS-5900-OA2-080218	8/2/2018	< 0.339	< 0.0914	< 0.0793	< 0.0238	< 0.0357	< 0.217
	5900-OA3	Outside west of the Building moved to southwestern corner of the Building.	5900-OA3-15421-032019	3/20/2019	1.36	< 0.0914	< 0.0793	0.0416	< 0.0357	< 0.217
227.2	SSDS Exhaust Blower	Monitoring port on influent of SSDS exhaust blower	OLY-Influent-010517	1/5/2017	1.49	9.47	2.21	0.511	0.0979	< 0.217
SSDS Influent			NATUS-INFLUENT-032118	3/21/2018	0.675	1.06	0.118	0.0948	< 0.0357	< 0.217
			NATUS-INF-15894-032019	3/20/2019	1.46	0.567	< 0.0793	< 0.0238	< 0.0357	< 0.217
Commercial Indoor Air IPIMAL - Cancer ²				22	1.5	Not Applicable ³	Not Applicable ³	Not Applicable ³	0.66	
Commercial Indoor Air IPIMAL - Non-cancer ²					7.5		0.39	12	39	19

NOTES:

Results in **bold** denote concentrations exceeding laboratory method reporting limits.

IPIMAL = inhalation pathway interim measure action level

 $\label{eq:pce} PCE = tetrachloroethene$

SSDS = subslab depressurization system

TCE = trichloroethene

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

Green-highlighted rows represent March 20, 2019 analytical data.

¹ Indoor and outdoor air samples analyzed by U.S. Environmental Protection Agency (EPA) Method Modified TO-15 SIM.

² Interim action levels presented from Updated Air and Groundwater IPIMALS/VIRLs for Residential and Commercial Scenarios for the Georgetown Site dated October 19, 2012. Note that only compounds representing a vapor intrusion risk are listed.

³ "Not Applicable" is used where the constituent of concern will not affect the medium of potential concern due to an incomplete pathway or no pertinent standard exists.