Soil data does not invalidate NFA - see comments below

Table 1

Soil Analytical Results Summary
Capitol Market Puchase
1516 Capitol Street NE, Salem, Marion County, Oregon
Terracon Project No. 82257187

All analytical results are reported in milligrams per kilogram (mg/kg)

Sample ID	Sample Date	TPH			Metals			VOCs																PAHs											
		GRO	DRO	RRO	Cadmium	Chromium	Lead	1,2,3-Trimethylbenzene	1,2,4-Trimethylbenzene	1,3,5-Trimethylbenzene	Benzene	Ethylbenzene	Isopropylbenzene	Naphthalene	n-Butylbenzene	n-Propylbenzene	p-Isopropyltoluene	sec-Butylbenzene	Styrene	Toluene	Xylenes (total)	Other VOCs	1-Methylnaphthalene	2-Methylnaphthalene	Acenaphthene	Acenaphthylene	Anthracene	Fluoranthene	Fluorene	Naphthalene	Phenanthrene	Pyrene	Other PAHs	
SB-1 (7-8)	7/21/2025	< 2.56	< 1.85	< 4.62	**0.184 J**	**22.3**	**13.0**	< 0.00300	< 0.00300	< 0.00380	< 0.000886 J3	< 0.00140	< 0.000806	< 0.00926	< 0.00996 J3	< 0.00180	< 0.00484	< 0.00547	**0.00169 J J3**	< 0.00247	< 0.00167	ND	< 0.00304	< 0.00793	< 0.00225	< 0.00221	< 0.00226	< 0.00332	< 0.00250	< 0.00804	< 0.00424	< 0.00285	ND
SB-2 (6-7)	7/21/2025	**1,500**	**54.9**	< 4.54	**0.179 J**	**26.3**	**19.3**	**31.1**	**157**	**46.3**	**4.20**	**67.1**	**6.44**	**20.6**	**5.88**	**26.5**	**1.52**	**3.11**	< 0.0159	**2.55**	**272**	ND	**1.99**	**4.13**	**0.0147**	**0.00700 J**	**0.00304 J**	**0.00357 J**	**0.0142**	**4.65**	**0.0219**	**0.00533 J**	ND
SB-3 (8-9)	7/21/2025	< 2.56	**4.41 J**	<	**0.122 J**	**32.7**	**15.2**	< 0.00269	< 0.00269	< 0.00340	< 0.000795 J3	< 0.00125	< 0.000722	< 0.00830	< 0.00892 J3	< 0.00161	< 0.00434	< 0.00490	< 0.000389 J3	< 0.00221	< 0.00150	ND	< 0.00294	< 0.00767	< 0.00218	< 0.00214	< 0.00219	< 0.00321	< 0.00242	< 0.00778	< 0.00410	< 0.00276	ND
SB-4 (3-4)	7/21/2025	< 2.30	**2.03 J**	1	**0.114 J**	**33.8**	**15.6**	< 0.00270	**0.00867**	< 0.00341	**0.00207**	**0.00522**	< 0.000726	< 0.00833	< 0.00896	**0.00179 J**	< 0.00435	< 0.00492	< 0.000391	< 0.00222	**0.0205**	ND	**0.00351 J**	**0.00854 J**	< 0.00218	< 0.00214	< 0.00219	< 0.00321	< 0.00242	**0.0130 J**	< 0.00410	< 0.00276	ND
SB-5 (4-5)	7/21/2025	< 2.20	< 1.74	< 4.36	**0.141 J**	**24.9**	**14.3**	< 0.00258	< 0.00258	< 0.00326	< 0.000762 J3	< 0.00120	< 0.000693	< 0.00796	< 0.00857 J3	< 0.00155	< 0.00416	< 0.00470	**0.00179 J J3**	**0.00434 J**	**0.00423 J**	ND	< 0.00287	< 0.00748	< 0.00212	< 0.00208	< 0.00213	< 0.00313	< 0.00236	< 0.00758	< 0.00399	< 0.00268	ND
DEQ Risk-Based Concentrations																																			
Res. RBCss		1,200	1,100	....	78	120,000**	400	....	430	430	8.2	34	3,500	5.3	....	....	....	....	7,900	5,800	1,400	--	....	....	4,700	....	23,000	2,400	3,100	5.30	....	1,800	--
Urban Res. RBCss		2,500	2,200	....	160	230,000**	400	....	860	860	24	110	7,000	25	....	....	....	....	16,000	12,000	2,900	--	....	....	9,400	....	47,000	4,800	6,300	25	....	3,600	--
Occ. RBCss		20,000	14,000	....	1,100	>Max**	800	....	6,900	6,900	37	150	57,000	23	....	....	....	....	130,000	88,000	25,000	--	....	....	70,000	....	350,000	30,000	47,000	23	....	23,000	--
Cons. RBCss		9,700	4,600	....	350	530,000**	800	....	2,900	2,900	380	1,700	27,000	580	....	....	....	....	56,000	28,000	20,000	--	....	....	21,000	....	110,000	10,000	14,000	580	....	7,500	--
Exc. RBCss		>Max	>Max	....	9,700	>Max**	800	....	81,000	81,000	11,000	49,000	750,000	16,000	....	....	....	....	>Max	770,000	560,000	--	....	....	590,000	....	>Max	280,000	390,000	16,000	....	210,000	--
Res. RBCso		5,900	>Max	....	NV	NV	NV	....	>Csat	>Csat	11	36	>Csat	6.4	....	....	....	....	>Csat	>Csat	>Csat	--	....	....	>Max	....	>Max	NV	>Max	6.4	....	>Max	--
Urban Res. RBCso		5,900	>Max	....	NV	NV	NV	....	>Csat	>Csat	27	85	>Csat	15	....	....	....	....	>Csat	>Csat	>Csat	--	....	....	>Max	....	>Max	NV	>Max	15	....	>Max	--
Occ. RBCso		69,000	>Max	....	NV	NV	NV	....	>Csat	>Csat	50	160	>Csat	83	....	....	....	....	>Csat	>Csat	>Csat	--	....	....	>Max	....	>Max	NV	>Max	83	....	>Max	--
Res. RBCsw		31	9,500	....	*	*	30	....	10	11	0.023	0.22	96	0.077	....	....	....	....	170	84	23	--	....	....	>Csat	....	>Csat	>Csat	>Csat	0.077	....	>Csat	--
Urban Res. RBCsw		31	9,500	....	*	*	30	....	43	45	0.10	0.94	>Csat	[illegible]	....	....	....	....	640	340	87	--	....	....	>Csat	....	>Csat	>Csat	>Csat	0.37	....	>Csat	--
Occ. RBCsw		130	>Max	....	*	*	30	....	48	53	0.10	0.90	>Csat	[illegible]	....	....	....	....	800	490	100	--	....	....	>Csat	....	>Csat	>Csat	>Csat	0.34	....	>Csat	--

Notes :
DEQ = Oregon Department of Environmental Quality
RBC = Risk Based Concentration
Color highlighted cells indicate reported concentration exceeds corresponding RBC.
Analytes with no detection above the laboratory reporting limit are not presented in the table above. A full list of analytes is included in the laboratory analytical report.
..... = No Published RBCs or CFV/OBM, or the exposure pathway for this compound is indirect and has been addressed through a direct exposure pathway scenario.
>Csat = The soil RBC exceeds the limit of three-phase equilibrium partitioning.
>Max = The constituent RBC for this pathway is calculated as greater than 1,000,000 mg/kg. Therefore, this substance is deemed not to pose risks in this scenario.
* = Leaching-to-Groundwater RBCs are not provided for inorganic chemicals. If this pathway is of concern, then site-specific leaching test must be performed.
** = RBCs shown are for trivalent chromium. No known source of hexavalent chromium is present for the site.
NV = This chemical is considered "nonvolatile" for purposes of the exposure calculations.
NA = Not Analyzed
EPA = Environmental Protection Agency
TPH = Total Petroleum Hydrocarbons
GRO = TPH in the Gasoline Range Organics - Analyzed by Northwest Method NWTPH-Gx
DRO = TPH in the Diesel Range Organics - Analyzed by Northwest Method NWTPH-Dx
RRO = TPH in the Residual-Oil Range Organics - Analyzed by Northwest Method NWTPH-Dx
Metals = Resource Conservation and Recovery Act Metals - Analyzed by EPA Methods 6010 and 7174
VOCs = Volatile Organic Compounds - Analyzed by EPA Method 8260D
PAHs = Polynuclear Aromatic Hydrocarbons - Analyzed by EPA Method 8270 SIM
Bold = Detected in Sample
J = The identification of the analyte is acceptable; the reported value is an estimate
J3 - The associated batch QC was outside the estabalished quality control range for precision
C3 - The reported concentration is an estimate. The continuing calibration standard associated with this data reponded low. Method sensitivity check is acceptable
+ = Method Detection Limit exceeds one or more DEQ RBCs and/or CFV/OBM

Oregon DEQ Soil Exposure Pathways
Res. = Residential receptor
Urban Res. = Urban residential receptor
Occ. = Occupational receptor
Cons. = Construction Worker receptor
Exc. = Excavation Worker receptor
RBCss = Soil Ingestion, Dermal Contact, and Inhalation
RBCso = Volatilization to Outdoor Air
RBCsw = Leaching to Groundwater

Table 2

Groundwater Analytical Results Summary
Capitol Market Purchase
1516 Capitol Street NE, Salem, Marion County, Oregon
Terracon Project No. 82257187

All analytical results are reported in micrograms per liter (ug/L)

Sample ID	Sample Date	TPH			Metals (Dissolved)			VOCs														PAHs								
		GRO	DRO	RRO	Cadmium	Chromium	Lead	1,2,3 -Trimethylbenzene	1,2,4 -Trimethylbenzene	1,3,5- Trimethylbenzene	Benzene	Ethylbenzene	Isopropylbenzene (Cumene)	Naphthalene	n-Butylbenzene	n-Propylbenzene	p-Isopropyltoluene	sec-Butylbenzene	Toluene	Xylenes (total)	Other VOCs	1-Methylnaphthalene	2-Methylnaphthalene	Acenaphthene	Acenaphthylene	Fluorene	Naphthalene	Phenanthrene	Other PAHs	
SB-1 GW	7/21/2025	< 78.6	**217**	**377**	< 0.538	**2.41 BJ**	< 2.43	< 0.339	< 0.274	< 0.266	< 0.320	< 0.234	< 0.105 C3 J4	< 2.64 C3	< 0.516	< 0.239	< 0.345	< 0.355	< 0.274	< 0.319	ND	< 0.112	< 0.117	< 0.0202	< 0.0221	< 0.0212	< 0.118	< 0.0279	ND	
SB-2 GW	7/21/2025	**8,470**	**399**	**183 J**	< 0.538	**2.09 BJ**	< 2.43	**90.3**	**437**	**110**	**166**	**261**	**14.9 C3 J4**	**48.7 C3**	**11.1**	**50.1**	**14.7**	**5.77**	**537**	**1,460**	ND	**18.9**	**35.8**	**0.117**	**0.0630**	**0.115**	**59.1**	**0.123**	ND	
SB-3 GW	7/21/2025	< 78.6	**134**	**126 J**	**0.631 J**	**3.26 BJ**	**3.17 J**	< 0.339	< 0.274	< 0.266	**0.448 J**	< 0.234	< 0.105 C3 J4	< 2.64 C3	< 0.516	< 0.239	< 0.345	< 0.355	< 0.274	< 0.319	ND	**0.249 J**	**0.241 J**	< 0.0208	< 0.0228	< 0.0218	**0.377**	**0.0328 J**	ND	
SB-4 GW	7/21/2025	**209**	**214**	**722**	**1.18 J**	**2.44 BJ**	**2.43 BJ**	< 0.339	< 0.274	< 0.266	< 0.320	< 0.234	< 0.105 C3 J4	< 2.64 C3	< 0.516	< 0.239	< 0.345	< 0.355	< 0.274	< 0.319	ND	< 0.115	< 0.121	< 0.0208	< 0.0228	< 0.0218	< 0.122	< 0.0287	ND	
SB-5 GW	7/21/2025	< 78.6	**189**	**559**	< 0.538	**2.47 BJ**	< 2.43	< 0.339	< 0.274	< 0.266	< 0.320	< 0.234	< 0.105 C3 J4	< 2.64 C3	< 0.516	< 0.239	< 0.345	< 0.355	< 0.274	< 0.319	ND	< 0.112	< 0.117	< 0.0202	< 0.0221	**0.0368 J**	< 0.118	< 0.0279	ND	
DEQ Risk-Based Concentrations																														
~~Res. RBCtw~~		~~110~~	~~100~~	....	~~20~~	~~38,000~~	~~15~~	....	~~54~~	~~59~~	~~0.46~~	~~1.5~~	~~440~~	~~0.17~~	....	....	....	....	....	~~1,100~~	~~190~~	--	....	....	~~510~~	....	~~200~~	~~0.17~~	....	--	
~~Urban Res. RBCtw~~		~~110~~	~~100~~	....	~~73~~	~~110,000~~	~~15~~	....	~~230~~	~~240~~	~~2.0~~	~~6.7~~	~~1,800~~	~~0.78~~	....	....	....	....	....	~~4,400~~	~~710~~	--	....	....	~~2,400~~	....	~~1,400~~	~~0.78~~	....	--	
~~Occ. RBCtw~~		~~450~~	~~400~~	....	~~100~~	~~230,000~~	~~15~~	....	~~230~~	~~200~~	~~2.1~~	~~6.4~~	~~2,000~~	~~0.72~~	....	....	....	....	....	~~6,300~~	~~630~~	--	....	....	~~2,300~~	....	~~1,300~~	~~0.72~~	....	--	
Res. RBCwo		>S	>S	....	NV	NV	NV	....	>S	>S	3,100	9,900	>S	3,600	....	....	....	....	>S	>S	--	....	....	>S	....	>S	3,600	....	--	
Urban Res. RBCwo		>S	>S	....	NV	NV	NV	....	>S	>S	7,400	23,000	>S	8,500	....	....	....	....	>S	>S	--	....	....	>S	....	>S	8,500	....	--	
Occ. RBCwo		>S	>S	....	NV	NV	NV	....	>S	>S	14,000	43,000	>S	16,000	....	....	....	....	>S	>S	--	....	....	>S	....	>S	16,000	....	--	
Chronic VI Res. RBCwi Cancer		NITI	NITI	....	NV	NITI, NV	....	NITI	NITI	NITI	2.8	7.1	NITI	11	....	NITI	NITI	....	NITI	NITI	--	NITI	....	....	....	....	11	....	--	
Chronic VI Com. RBCwi Cancer		NITI	NITI	....	NV	NITI, NV	....	NITI	NITI	NITI	12	31	NITI	50	....	NITI	NITI	....	NITI	NITI	--	NITI, NV	....	....	....	....	50	....	--	
Chronic VI Res. RBCwi Noncancer		120	400	....	NV	NV	....	990	560	400	240	6,600	2,200	430	....	5,300	210	....	36,000	730	--	0.0	....	....	....	....	430	....	--	
Chronic VI Com. RBCwi Noncancer		520	1,700	....	NV	NV	....	4,100	2,400	1,700	1,000	27,000	9,100	1,800	....	22,000	880	....	150,000	3,300	--	NV	....	....	....	....	1,800	....	--	
Acute VI Res. RBCwi Noncancer		....	....	....	NV	NV	....	....	....	....	220	140,000	....	27,000	....	....	....	....	52,000	65,000	--	....	....	....	....	....	27,000	....	--	
Acute VI Com. RBCwi Noncancer		....	....	....	NV	NV	....	....	....	....	670	410,000	....	82,000	....	....	....	....	160,000	190,000	--	....	....	....	....	....	82,000	....	--	
Const. & Exc. RBCwe		14,000	>S	....	130,000	>S	>S	....	6,300	7,500	1,800	4,500	51,000	500	....	....	....	....	220,000	23,000	--	....	....	>S	....	>S	500	....	--	

Notes and Qualifiers:
DEQ = Oregon Department of Environmental Quality
RBC = Risk Based Concentration
Color highlighted cells indicate reported concentration exceeds corresponding RBC.
Analytes with no detection above the laboratory reporting limit are not presented in the table above. A full list of analytes is included in the laboratory analytical report.
.... = No Published RBCs, or the exposure pathway for this compound is indirect and has been addressed through a direct exposure pathway scenario.
NV = This chemical is considered "nonvolatile" for purposes of the exposure calculations.
NITI = No inhalation toxicity information
>S = This groundwater RBC exceeds the solubility limit. Groundwater concentrations in excess of S indicate that free product may be present.
NC = Not calculated
EPA = Environmental Protection Agency
TPH = Total Petroleum Hydrocarbons
GRO = TPH in the Gasoline Range Organics - Analyzed by Northwest Method NWTPH-Gx
DRO = TPH in the Diesel Range Organics - Analyzed by Northwest Method NWTPH-Dx
RRO = TPH in the Residual-Oil Range Organics - Analyzed by Northwest Method NWTPH-Dx
VOCs = Volatile Organic Compounds - Analyzed by EPA Method 8260D
PAHs = Polynuclear Aromatic Hydrocarbons - Analyzed by EPA Method 8270 SIM
Metals (Dissolved) = Analyzed by EPA Methods 6010 and 7174
ND = Not detected above laboratory reporting limits
Bold = Detected in Sample
J = The identification of the analyte is acceptable; the reported value is an estimate
B = The same analyte is found in the associated blank
J3 = The associated batch QC was outside th established quality control range for precision
J4 = The associated batch QC was ouside the established quality control range for accuracy
C3 = The reported concentration is an estimate. The continuing calibration standard associated with this data reponded low. Method sensitivity check is acceptable

Oregon DEQ Soil Exposure Pathways
Res. = Residential receptor
Urban Res. = Urban residential receptor
Occ. = Occupational receptor
Com. = Commercial receptor
Cons. = Construction Worker receptor
Exc. = Excavation Worker receptor
RBCtw = Ingestion & Inhalation from Tapwater
RBCwo = Volatilization to Outdoor Air
RBCwi = Groundwater Volatilization to Indoor Air (Chronic)
RBCwe = Groundwater in Excavation