

August 5, 2004

Ms. Carole Washburn, Secretary Washington Utilities & Transportation Commission P.O. Box 47250 Olympia, WA 98504

Dear Ms. Washburn:

Subject:

Docket UG-920781 (WNG)

Docket UE-911476 (PSP&L)

Report on Environmental Issues for the period ending June 30, 2004

FORMER WNG SITES

A. Tacoma Gas Company Site (Upland Source Control)

The remediation of the Standard Chemical seep and the SB-16 hot spot area have now been completed by WDOE. Discussions between PSE and WDOE revealed that further documentation describing conditions on a site wide basis is necessary. Accordingly, closure of this site will require development of RI/FS and CAP documents for addressing portions of the site under the I-705 overpass.

Remedial costs incurred through 6/30/04

\$ 694,188.08

B. Thea Foss Waterway

The construction phase of this project is essentially completed with one exception. It will be necessary to buttress the sheet pile wall using rip-rap. This final task will be completed after the City of Tacoma performs dredging for navigational purposes, which is scheduled to occur during the 3rd quarter of 2004. As of June 30th, the project remains on budget.

Remedial costs incurred through 6/30/04

\$ 2,645,811.66

C. Everett, Washington

PSE continues regular monitoring of the results of the remediation already performed. The remedy chosen for this site was a containment wall with monitoring wells at both ends.

PM

COPY TO ENERGY

Remedial costs incurred through 6/30/04

\$ 1,239,833.58

D. Chehalis, Washington - Gas Site

Recent information collected from our monitoring wells on site and off-site indicates a need to commence further investigation and potential remediation. We are in the process of undertaking this effort and will perform additional work at this site in 2004.

Remedial costs incurred through 6/30/04

\$ 1,961,210.86

E. Gas Works Park

No change. The only ongoing activity is the monitoring of the remediation. This is the responsibility of the City of Seattle.

Remedial costs incurred through 6/30/04

\$ 2,573,828.37

F. 5th and Jackson

Union Station Associates and PSE settled the pending litigation in December 2002. We are still working with our insurance carriers to recover costs associated with the defense and settlement of this litigation.

Total investigative and settlement costs through 6/30/04

\$2,382,134.44

G. Quendall Terminals

There has been virtually no communication with PSE regarding this site for a few years. PSE has attempted to monitor activities, and we continue to deny liability. However, given the current estimate of costs, allegations by other parties, and our ongoing investigation, it remains difficult to estimate project costs. Historically, we have simply referenced the \$1,000,000 demand tendered by the City of Renton. However, we now believe that a potential range of costs more accurately reflects the risks faced by PSE at this site.

H. Lake Union

PSE has continued extensive negotiations with both WDOE and the City of Seattle. PSE and the City of Seattle have recently reached agreement on a solution that would allocate our respective responsibilities through the Remedial Investigation and Feasibility Study phases of this project. In addition, we are continuing our dialogue with WDOE concerning the proposed allocation of responsibilities and an Agreed Order.

Remedial costs incurred through 6/30/04

\$ 2,098,177.99

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I. Tacoma Tar Pits

The pump and treat system is operating and PSE continues to monitor the performance of it. EPA completed its second five-year review of the project and continues to approve of the work we are performing at this site.

Remedial costs incurred through 6/30/04

\$ 36,703,796.85

J. Crossroads Business Office (new site)

PSE currently is pursuing a Clearing and Grading permit through the City of Bellevue in preparation to excavate approximately 3,000 cubic yards of gasoline-range hydrocarbon impacted soil at the site.

Remedial costs incurred through 6/30/04

\$ 68,825.78

(new item in this report – note that the cost estimate for item 13 below was adjusted downward because this project is now described separately herein)

FORMER PUGET POWER SITES

A. Northwest Transformer, Mission Pole

PSE monitors this site, but it has very little additional activity following the completed remediation.

B. Puyallup Garage

PSE expects to perform remediation at this site in the future, but is presently monitoring the property only.

C. Underground Storage Tanks Status

Please see the attached spreadsheet. This provides a summary of our ongoing efforts associated with the investigation, remediation, and/or removal of underground storage tanks. Please note that the Crossroads Business Office UST-related cleanup and our estimate of related costs are described in item 10 above. The estimate of future expenditures in this category has been adjusted accordingly.

Projected Future Expenditures

\$ 210,000 - \$ 310,000

D. Buckley Headworks Site

Phase 1

Remediation of the first area of investigation was completed in 2002 in accordance with MTCA and WDOE has provided a No Further Action Letter. This phase of the project is

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completed and PSE has pursued insurance recovery for costs associated with the remediation of the wood treatment facility area.

Costs incurred thus far are substantially associated with our efforts to remediate this portion of the facility. As of 6/30/04, the total costs incurred are \$2,304,499.59. However, costs incurred after 6/30/03 are associated with monitoring the work already completed.

Phase 2

PSE continues to investigate three other areas noted during our initial remediation work that will require remediation. The groundwater monitoring program was recently expanded to assess the full extent of impacts.

The full nature and cause of issues identified in these areas is not yet fully known.

Remedial costs incurred through 6/30/04

\$14,813.91

E. Duwamish Waterway (Potential New Site)

While PSE has not been formally designated as a PLP for this site in south Seattle, allegations have been made by other parties that PSE may have contributed to contamination in this Waterway as a result of the operations of a steam plant in the Georgetown area. It remains premature to determine either the merit of these claims or the amount of any formal claim that may be brought against PSE.

F. Olympia Capacitor Site

PSE used arbitration to reach an agreement with the property owner allowing for the cleanup of the known PCB contamination at the site. The cleanup is scheduled for completion by the end of August 2004. PCB contaminated soil will be excavated and transported off-site for permitted disposal as a independent cleanup action that satisfies local, state and federal regulatory requirements.

Remedial costs incurred through 6/30/04

\$ 133,936.86

This list represents current major sites PSE is investigating, monitoring, or remediating. With respect to insurance litigation, PSE is still in the discovery stages of the PSE vs. Alba Insurance Co. et. al. case. The sites covered by this litigation include the following:

Gas Works Park,
Lake Union,
5th and Jackson (Lloyds only),
Chehalis,
Everett,
Thea Foss Waterway, and
22d and A Street MGP site (Tacoma).

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The insurance carriers still remaining in the case presently include the following: Lloyds of London, United State Fire Insurance Co., Travelers, Pacific Employers Insurance Co., and Century Indemnity Insurance Co.

The insurance companies have noted multiple depositions this quarter and that effort is expected to continue. However, the trial date was continued and is now tentatively scheduled for late summer 2005.

Sincerely

Steven R. Secrist

Director - Environmental Services

Attachments

cc: Jim Eldredge

Mike Main

Karl Karzmar

Bert Valdman

Chuck Gordon

David Brenner

Mike Stranik

Jennifer O'Connor

Jim Hackbarth

H\Environmental\Electric\Electric Env 6-30-0

PUGET SOUND ENERGY SUMMARY OF (ELECTRIC) ENVIRONMENTAL DEFERRED REMEDIATION COSTS JUNE 30, 2004

				22840111		22840091	22840081	22840061	22840051	& 22840041 & 22840042	22840031		22840011				18230031		18230011		18230021	18230007	18230022	18230009		September SAP ORDER
		22841001	22840121	22840111	22840101	22840091	22840081	22840061	22840051	22840041	22840031	22840021	22840011				18233071	18233061	18233051	18232291	18232271	18232241	18233081 18232281	18232221 18232251		September 2000 - forward SAP ORDER SAP ACCOUNT
TOTAL ACCRUED ASSETS & LIABILITIES	TOTAL ACCRUED LIABILITY	AETNA II Lawsuit unallocated proceeds	Olympia SVC Capacitor Def Site	Poulsbo Service Center	Env Rem - Centralia Plant	Bellevue GO UST Site	Puyallup Garage expensed Site	Tenino UST Def Site	Whidbey Island UST Def Site	Bremerton UST Def Site	Olympia UST Def Site	Buckley White River Phase II Def Site	NWT - Mission Pole Def Site		TOTAL ACCRUED ASSETS	SUBTOTAL REMEDIATION SITE	Env Rem - UG Tank - Kent Fleet	Env Rem - UG Tank - Poulsbo Service Center	Env Rem - UG Tank - Baker Lodge	Bellevue G.O. UST Site; Future Estimated Costs	Env Rem - Duwamish River Site (former Georgetown)	Buckley Phase 1-Wood Treatment Area Env Remed Cost	Env Rem - Olympia SVC Capacitor Site Future Est Cost Env Rem - Olympia SVC Capacitor Site SUBTOTAL OLYMPIA SVC CAPACITOR SITE	Env Rem- Buckley-White River Phase II Future Est Cost Buckley Phase II -Burn Pile & Wood Debris Env Rem Cost SUBTOTAL BUCKLEY HEADWORKS MTCA SITE		SITE DESCRIPTION
		N/A	z	z	z	z	z	z	z	z	z	z	z				≺	z	⊀	z	z	~	zz	ZZ		ALL REMEDIATION COSTS INCURRED?
		~	~	~	z	~	~	~	~	~	~	z	~				~	~	~	~	z	~	zz	zz		ALL INSURANCE PROCEEDS RECEIVED?
																	5/1/2001					1/1/2004				AMORT START DATE
	0.00														1,466.24	1,466.24	1,466.24					19,395.38	0.00	0.00		MONTHLY AMORT
	11 1														1 1	1 1	38					თ				YTD AMORT MONTHS
2,710,881.38	99,413.61					8,365.81	8,954.09	18,051.52		43,513.24	20,528.95				2,611,467.77	2,462,717.00	87,974.39		13,442.34		56,800.68 (1)	2,304,499.59	133,936.86 133,936.86	14,813.91 14,813.91	(a)	INCEPTION TO-DATE COSTS
(3,487,540.41)	(2,346,763.38)	(1,481,763.38)				(150,000.00)	(350,000.00)	(75,000.00)	(15,000.00)	(50,000.00)	(150,000.00)		(75,000.00)		(1,140,777.03)	(1,140,777.03)						(1,140,777.03)	0.00	0.00	(b)	INC-TO-DATE
(90,000.00)	(1,851,249.23)		(216,063.14)	(10,000.00)	(140,000.00)							(1,485,186.09)			1,761,249.23	60,000.00		10,000.00		50,000.00			216,063.14 216,063.14	1,485,186.09 1,485,186.09	(0)	ESTIMATED FUTURE COSTS
0.00	0.00														0.00	0.00							0.00	0.00	(d)	PROBABLE FUTURE INS PROCEEDS
(866,659.03)	(4,098,599.00)	(1,481,763.38)	(216,063.14)	(10,000.00)	(140,000.00)	(141,634.19)	(341,045.91)	(56,948.48)	(15,000.00)	(6,486.76)	(129,471.05)	(1,485,186.09)	(75,000.00)		3,231,939.97	1,381,939.97	87,974.39	10,000.00	13,442.34	50,000.00	56,800.68	1,163,722.56	216,063.14 133,936.86 350,000.00	1,485,186.09 14,813.91 1,500,000.00	(e)=(a)+(b)+(c)+(d)	SUBTOTAL AS OF 6/30/04
172,089.40	0.00	\$1. 20	Section 2	J. September 1		******		ė kyrė i s	Jan 19 10 10 10 10 10 10 10 10 10 10 10 10 10	Shirter see	e, tr	مناور روا	, K. Waring	******	172,089.40	172,089.40	55,717.12	grguer u var	. Louis Inc.	\$ # 473367*****	Q 547-7	116,372.28	0.00	00.00	Э	AMORT THROUGH 6/30/04
(1,038,748.43)	(4,098,599.00)	(1,481,763.38)	(216,063.14)	(10,000.00)	(140,000.00)	(141,634.19)	(341,045.91)	(56,948.48)	(15,000.00)	(6,486.76)	(129,471.05)	(1,485,186.09)	(75,000.00)		3,059,850.57	1,209,850.57	32,257.27	10,000.00	13,442.34	50,000.00	56,800.68	1,047,350.28	216,063.14 133,936.86 350,000.00	1,485,186.09 14,813.91 1,500,000.00	(e)+(f)	BALANCE AS OF 6/30/04

(1) Per Steve Secrist, PSE cannot determine the range at this time as the activity on the Duwamish River Site by the primary parties has ceased to involve PSE.

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PUGET SOUND ENERGY, INC. DEFERRED ENVIRONMENTAL COST SUMMARY GAS June 30, 2004

18609202 18608942	18608102 18608812	18607102 18608712 18607203 18608742	18606102 18608612 18606203 18608642	18605203 18608542 18605102 18608512	18604203 18608442 18604102 18608412 18608452	18603102 18608312	18602102 18608212 18602203 18608242	18601203 18608142 18601102 18608112 18601102 18608112 18601102 18608152	September 1998 - forward SAP ORDER SAP ACCOUNT
OMNIBUS INSURANCE LITIGATION (9 MFG. GAS SITES) Legal costs	<u>TULALIP</u> Remediation costs	WSDOT THEA FOSS Remediation costs Legal costs SUBTOTAL	WSDOT UPLAND (Aka 22nd & A Street, Tacoma Gas Company Site) Remediation Costs Legal Costs SUBTOTAL	WSDOT FEDERAL/STATE Legal costs Remediation Costs SUB TOTAL	GAS WORKS - SEATTLE Legal Costs Remediation Costs Internal Costs - pre-1997 SUBTOTAL Gas Works - Seattle	CHEHALIS Remediation Costs	EVERETT Remediation Costs Legal Costs SUBTOTAL Everett	TACOMA TIDE F Legal Costs Remediation Cost Remediation Cost Remediation Cost Internal Costs pre SUBTOTAL Tac	Site Description FORMER MANUFACTURED GAS SITES:
2,225,440.39	995.00	2,645,860.09 2,560,457.60 5,206,317.69	690,872,43 15,888.20 706,760,63	379,591.40 - 379,591.40	763,422.75 2,573,828.37 366.95 3,337,618.07	1,953,850.18	1,242,842.59 8,717,50 1,251,560.09	9,351,936.58 34,831,847,66 1,847,961.33 209,796.52 46,241,542.09	5/31/2004 Account Balance
11,337.29		(48.43) 40,499.24 40,450.81	3,315.65 - 3,315.65		13,168.79 - 13,168.79	7,360.68	(3,009.01)	19,085,89 4,901.97 23,987.86	Activity
2,236,777.68	995.00	2,645,811.66 2,600,956.84 5,246,768.50	694, 188, 08 15, 888, 20 710, 076, 28	379,591,40 - 379,591,40	776,591.54 2,573,828.37 366.96 3,350,786.86	1,961,210.86	1,239,833.58 8,717.50 1,248,551.08	9,351,936.58 34,860,933.56 1,852,863.30 209,796.52 46,265,529.95	6/30/2004 Account Balance
N/A	N/A	6,500,000.00 6,500,000.00	1,100,000.00 1,100,000.00	N/A	3,200,000.00 3,200,000.00	2,500,000.00	2,700,000.00	2,450,000.00 2,450,000.00	Env Services Project Cost Estimates 6/30/2004 (d)
		3,854,188.34 3,854,188.34	405,811.92 405,811.92		626,171.63 626,171.63	538,789.14	1,460,166.42 1,460,166.42	597,136.70 597,136.70	Remediation Cost Estimates Remaining 18608022 18236022 22840002
	1.1	1.1	1.1	1.1					Amortization Through 6/30/04 Dr. 40700002
2,236,777.68	995.00	2,645,811.66 2,600,956.84 5,246,768.50	694, 188.08 15,888.20 710,076.28	379,591.40 0.00 379,591.40	776,591.54 2,573,828.37 366.95 3,350,786.86	1,961,210.86	1,239,833.58 8,717.50 1,248,551.08	9,351,936.58 34,860,933.55 1,852,663.30 209,796.52 46,265,529.95	Balance At 6/30/2004 Closing

PUGET SOUND ENERGY, INC. DEFERRED ENVIRONMENTAL COST SUMMARY GAS June 30, 2004

		18236022 18236032	18230210 18237112 18230212 18237112		18230206 18236612		18230204 18236412 18230203 18236312	•		18608062	18608022		18614102 18609312 18614202 18600082	18612102 18609512	18611102 18609212		18610105 18609142		18610102 18609112		September 1998 - forward SAP ORDER SAP ACCOUNT
TOTAL - GAS STORAGE TANKS AND MANUFACTURED GAS SITES	TOTAL - GAS UNDERGROUND STORAGE TANKS	ESTIMATED FUTURE COSTS ESTIMATED FUTURE INSURANCE RECOVERIES	NOR IH OFFICATING BASE SWARR STATION	UW TACOMA PIPELINE PROJECT (60 month amort began 1/1/00)	CROSSROADS OPERATING BASE	GEORGETOWN OPERATING BASE (60 month amort began 8/1/98)	MERCER BUILDING (80 month amort began 2/98) KENT OPERATING BASE (60 month amort began 5/1/98)	GAS UNDERGROUND STORAGE TANKS AND OTHER SITES	TOTAL - FORMER MANUFACTURED GAS SITES	Insurance and Third Party Inception-to-Date Recoveries	Estimated Future Costs		LAKE UNION Remediation costs Legal Costs	QUENDALL TERMINALS	MERCER STREET Remediation costs	SUBTOTAL			5TH & JACKSON Remediation costs		Site Description
\$ 39,321,653.42	\$ 1,038,184.87	682,849.47	82,291.06	65,737.77	67,150.53	35,597.80	41,748.85 40,379.09		\$ 38,283,468.55	(58,177,768.28)	31,938,944.46	2,061,090.08	2,056,149.45 4,940.63		66,942.15	1,090,584.60	(1,413,413.62)	1,196,863.98	2.382.134.44		5/31/2004 Account Balance
\$ (360,756.56) \$	\$ (194,538.87)	(201,675.25)	5,461.13		1,675.25				\$ (166,217.69) \$		(304,858.30)	42,028.54	42,028.54 •								Activity
38,960,896.86 \$	843,646.00 \$	481,174.22	87,752.19	65,737.77	68,825.78	35,597.80	41,748.85 40,379.09		38,117,250.86 \$	(58,177,768.28)	31,634,086.16	2,103,118.62	2,098,177.99 4,940,63		66,942.15	1,090,584.60	(1,413,413.82)	1,196,863.98	2.382.134.44		6/30/2004 Account Balance
44,750,000.00	300,000.00		50,000.00		250,000.00				44,450,000.00			25,000,000.00	25,000,000.00	1,000,000.00					;	(d)	Env Services Project Cost Estimates 6/30/2004
\$ 31,615,260.38	231 174 22	231,174.22	50,000.00		181,174.22				\$ 31.384.986.1¢ (f) \$			22,901,822.01	22,901,822.01	1,000,000.00							Remaining 18608022 18236022 22840002
(g) \$ 199,320.06	\$ 199,320.06		-	59, 164.01			41,748.85 40,379.09		\$ (f)	11	11	ı 1		17	11	ı l					Am ortization Through 6/30/04 Dr. 40700002
\$ 38,511,576.80	\$ 394,325,94	231,174.22	87,752.19	6,573.76	68,825.78	0.00	(0.00) (0.00)		\$ 38,117,250.86	(58,177,768.28)	\$ 37.06 4.000 715 (f)	2,103,118.62	2,098,177.99 4,940.63	0.00	66,942.15	1,090,584.60	(1,413,413.82) (1,075,000.00)	1,196,863.98	2 382 134 44		Balance At 6/30/2004 Closing

⁽a) Represents costs accumulated through May 31, 2004
(b) Represents month of May 2004 Costs
(c) Represents costs accumulated through May 31, 2004 at preliminary closing
(d) Represents the low end of the probable future cost estimate range
(e) Represents remediation cost estimates
(f) Represents balance in Account 18608022 after quarterly true-up
(g) Represents balance in Account 22840002 after quarterly true-up
(f) Additional costs are expected for Swarr Station. Amount is unknown at this time.

PUGET SOUND ENERGY UST REMEDIAL COST ESTIMATES (Page 1 of 2) (updated 06/30/04)

PSE Facility/Location	Site Status	Proposed Remedial Action	Estimated Cost of Proposed Remedial Action (\$)
Baker River Lower Concrete, WA	2,500 gal. Gas and Diesel USTs	None	0
Baker River Upper Concrete, WA	1,000 gal. Gas and Diesel USTs	None	0
Bellingham Service Center Bellingham, WA	10,000 gal. Gas and Diesel USTs	None	0
Electron Forebay Orting, WA	550 gal. Gas and Diesel USTs	None	0
Electron Power House Orting, WA	500 gal. Gas and Diesel USTs	None	0
Factoria Service Center Bellevue, WA	10,000 gal. Gas and Diesel USTs	None	0
Kittitas Service Center Thorp, WA	5,000 gal. Gas and Diesel USTs	None	0
Olympia Service Center (Fuel Island) Olympia, WA	10,000 gal. Gas & Diesel USTs Gas spill Nov. '99	 A. Natural Attenuation and GW Monitoring (Existing Wells) B. Soil excavation when Fuel Island is removed 	A. 15,000 B. 50,000
Olympia Service Center (Post-EPRI Diesel Remediation) Olympia, WA	Diesel UST removed. Contaminated soil and ground water remains after EPRI air sparging program.	A. Natural Attenuation and GW Monitoring (Existing Wells) B. Soil excavation when building(s) is removed	A. 5,000 B. 100,000
Poulsbo Service Center Poulsbo, WA	6,000 gal. Gas & Diesel USTs	A. Natural Attenuation B. Soil excavation when building is removed.	A. 0 B. 10,000
Port Townsend Service Center Port Townsend, WA	6,000 gal. Gas & Diesel USTs	None	0
Skagit Service Center Burlington, WA	12,000 gal. Gas & Diesel USTs	None	0
Tacoma Office Tacoma, WA	10,000 gal. Gas UST	None	0
Crystal Mtn. Gen. Greenwood, WA	Three USTs	None	0
Bellevue Office Emer. Gen. Bellevue, WA	One UST	None	0
Green Mtn. Micro Wave Bremerton, WA	One UST	None	0

Notes shown on Page 2 of 2

PUGET SOUND ENERGY UST REMEDIAL COST ESTIMATES (Page 2 of 2)

PSE Facility/Location	Site Status	Proposed Remedial Action	Estimated Cost of Proposed Remedial Action (\$)
Rattlesnake Mtn. Micro Wave Issaquah, WA	One UST	None	0
Bremerton Service Center Bremerton, WA	Three USTs and majority of contaminated soil removed in 1999. Contaminated soil remains at A. Well abandonment property boundary and beneath building B. Soil excavation whe	A. Well abandonment B. Soil excavation when building(s) is removed	A. 2,000 B. 50,000
Whidbey Service Center Oak Harbor, WA	USTs and majority of contaminated soil removed in 1999. Small volume of contaminated soil remains beneath building	USTs and majority of contaminated soil removed in 1999. Small volume of contaminated A. VCP Program and GW Monitoring (New Wells) soil remains beneath building	A. 30,000 B.15,000
Tenino Service Center Tenino, WA	USTs and majority of contaminated soil removed in 1991. Small volume of contaminated Wells) soil remains beneath building	A. Natural Attenuation and GW Monitoring (Existing Wells) B. Soil excavation when building(s) is removed	A. 15,000 B.75,000
Mercer Operating Base Seattle, WA	Facility sold 1/2/01	None	0
Bellevue General Office Bellevue, WA	USTs removed in early 1990s. Contaminated soil remains adjacent to and beneath building. Ecology inquired re:site status February 2002	A. Natural Attenuation B. VES, if pushed by Ecology, or soil excavation when building(s) is removed	A. 25,000 B. 150,000
Buckley Headworks Buckley, WA	ment confirmed	None	0
North Operating Base Seattle, WA	USTs removed in 1999. Diesel- contaminated soil remains beneath fuel island.	A. Site Characterization and GW Monitoring (New Wells) B. Soil excavation when fuel island is removed	A. 20,000 B. 50,000
Cost Estimate Totals:	A. Ground Water Monitoring, Site Characteriza B. Remediation Only (No Monitoring) A. & B. Ground Water Monitoring Followed by I	A. Ground Water Monitoring, Site Characterization, Natural Attenuation Only (No Remediation) B. Remediation Only (No Monitoring) A. & B. Ground Water Monitoring Followed by Remediation	\$112,000 \$500,000 \$612,000

Cost Estimate Totals:

P:\04\Finals\0186483 USTCostEst.xls

Notes

- ¹ Remedial costs do not include demolition of facilities and buildings to access contaminated soil.
 - ² Ground water monitoring estimate assumes three years of monitoring/sampling.
- ³ All estimated costs should be considered conceptual. They are not based on a detailed scope of service or design.