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DEPARTMENT OF ECOLOGY
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June 7, 2021

Duane Meszaros
Director of Development
Russell Square Consulting, Inc.
700 Waterfront Way, Suite 301
Vancouver, Washington 98660
(duane@russellsquareconsulting.com)

Re: Opinion pursuant to WAC 173-340-515(5) on Remedial Action for the following Hazardous Waste Site:

- **Site Name:** Seitz Property
- **Site Address:** Brian Lane NW, Silverdale, Washington 98383
- **Facility/Site No.:** 6865393
- **Cleanup Site ID:** 1472
- **VCP Project No.:** NW3313

Dear Duane Meszaros:

The Washington State Department of Ecology (Ecology) received your request for an opinion on work planed at the Seitz Property facility (Site). This letter provides our opinion. We are providing this opinion under the authority of the Model Toxics Control Act (MTCA), Chapter 70A.305 RCW.

Issue Presented and Opinion

Does the proposed work described in the *Sampling and Analysis Plan, Soil and Groundwater Sampling*, dated April 26, 2021, meet the stated objectives with respect to Site data gaps?

No. The proposed scope of work should be revised based on Ecology's comments in this opinion letter to sufficiently address the data gaps.

Description of the Site

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

- Arsenic and carcinogenic polycyclic aromatic hydrocarbons (cPAHs) into the Soil.

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

Please note a parcel of real property can be affected by multiple sites. At this time, we have no information that the parcels associated with this Site are affected by other sites.

Basis for the Opinion

This opinion is based on the information contained in the documents listed in **Enclosure B**. A number of these documents are accessible in electronic form from the Site webpage[1]. The complete records are stored in the Central Files of the Northwest Regional Office of Ecology (NWRO) for review by appointment only. Visit our Public Records Request page[2] to submit a public records request or get more information about the process. If you require assistance with this process, you may contact the Public Records Officer at publicrecordsofficer@ecy.wa.gov or 360-407-6040.

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

Analysis and Opinion

Ecology issued a *Further Action* letter on March 9, 2021 *(March 2021 FA letter)*, which identified the following data gaps:

- Characterization of current soil conditions in areas of former debris piles and the former house, with respect to potential arsenic and/or petroleum hydrocarbon contaminations.

- Characterization of current soil conditions in the former drum storage area, with respect to the potential petroleum hydrocarbon contamination.

- Evaluation of Site groundwater occurrence, flow direction, and groundwater conditions in areas where waste has been disposed of historically.

Ecology received and reviewed a *Sampling and Analysis Plan, Soil and Groundwater Sampling*, dated April 26, 2021 *(April 2021 SAP)*. Ecology appreciates your timely response to the *March 2021 FA letter*. The *April 2021 SAP* proposed the following scope of work to address the data gaps:

- Collect surface soil samples at the former drum storage area, each of the two former debris piles, and former house, to determine soil conditions.

- Install monitoring wells in or near the former drum storage area, and within the footprint of each of the two former debris piles, to determine groundwater flow direction and groundwater quality. Soil boring samples will be collected during monitoring well installation.

[1] Site Information (wa.gov)
[2] https://ecology.wa.gov/About-us/Accountability-transparency/Public-records-requests

Based on a review of the *April 2021 SAP,* Ecology has the following comments:

- The surface soil samples collected should be discrete to provide representative soil data.
    - Table 1 of the *April 2021 SAP* proposes to collect composite soil samples from the sides and center of the former drum storage area.
    - Table 3 of the *April 2021 SAP* indicates that the surface soil samples collected from the former debris piles and former house will also be composite.
    - Table 1 of the *April 2021 SAP* indicates that surface soil samples will be collected from the depths of 0 to 1 foot below ground surface (bgs). Table 3 of the *April 2021 SAP* indicates that the surface soil samples at the former drum storage area will be collected from 0 to 6 inches bgs.
    - Ecology's guidance[3] requires that discrete soil samples be collected "*utilizing techniques for obtaining undisturbed samples like a split spoon, Shelby tubes, or direct push sleeves. Samples should not be composited for testing purposes*."
    - Therefore, in order to provide representative data, Ecology recommends collecting up to three discrete surface soil samples in each of the former drum storage area, two former debris piles, and former house area, at depths between 0 to 6 inches bgs.
- The surface soil samples collected at the former house should be analyzed for lead and arsenic.
    - The proposed analysis listed in Table 1 of the *April 2021 SAP* is not consistent with Table 3, for the surface soil samples collected at the former house. The analyses listed in Table 1 do not include arsenic and lead.
    - A surface soil sample collected at the former house (SP-5) in 2015 contained an arsenic concentration above the MTCA Method A soil cleanup level. Lead and arsenic analysis is needed for the surface soil samples collected in this area. Please revise Table 1.
- Section 5.1 of the *April 2021 SAP* should clearly list the soil cleanup standards.
    - As stated in the *March 2021 FA letter*, soil cleanup standards should be protective of groundwater (as a drinking water source), and the terrestrial ecological receptors (from the ground surface to 15 feet bgs only).
    - For soil samples collected from ground surface to 15 feet bgs, the soil cleanup levels should be the most stringent value among: (1) MTCA Method A soil cleanup levels, per WAC 173-

[3] Ecology, *Guidance for Remediation of Petroleum Contaminated Sites, Toxics Cleanup Program, Publication No. 10-09-057*, revised June 2016; Guidance for Remediation of Petroleum Contaminated Sites (wa.gov)

340-900, Table 740-1; and (2) the concentrations protective of terrestrial ecological receptors based on the simplified terrestrial ecological evaluation (TEE), per WAC 173-340-900, Table 749-2.

- For soil samples collected below 15 feet bgs, the soil cleanup levels should be the MTCA Method A soil cleanup levels, per WAC 173-340-900, Table 740-1.

- Therefore, Ecology recommends the following soil cleanup standards. Please note the cleanup levels are in milligrams per kilogram (mg/kg).

Potential Contaminants of Concern (COC)	Soil Cleanup Levels (0 to 15 feet bgs)	Soil Cleanup Levels (below 15 feet bgs)
Gasoline-range petroleum hydrocarbons (TPHg)	30/100 mg/kg [d]	30/100 mg/kg
Diesel- and heavy oil-range petroleum hydrocarbons (TPHd and TPHo) [a]	460 mg/kg	2,000 mg/kg
Benzene	0.03 mg/kg	0.03 mg/kg
Toluene	7 mg/kg	7 mg/kg
Ethylbenzene	6 mg/kg	6 mg/kg
Total Xylenes	9 mg/kg	9 mg/kg
cPAHs [b]	0.1 mg/kg	0.1 mg/kg
Arsenic	20 mg/kg	20 mg/kg
Lead	220 mg/kg	250 mg/kg
Polychlorinated Biphenyls (PCBs) [c]	1 mg/kg	1 mg/kg

Notes:

[a]: The cleanup levels should be compared with the sum of TPHd and TPHo concentrations, in accordance with Ecology's guidance[3,4].
[b]: This is the total toxic equivalent concentration (TEQ) of all cPAHs. See Ecology's guidance[5] on calculating cPAHs Total TEQ.
[c]: This is the total value of all PCBs in the PCB mixture.
[d]: The lower value applies when BTEX is detected in soil; the higher value applies when BTEX is not detected.

- Section 6.2 of the *April 2021 SAP*, or separate sections, should specify the monitoring well construction details and development procedure.

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[4] Ecology, *Determining Compliance with Method A Cleanup Levels for Diesel and Heavy Oil, Implementation Memorandum #4, Publication 04-09-086*, June 2004; Implementation Memorandum #4 Determining Compliance with Method A Cleanup Levels for Diesel and Heavy Oil (wa.gov)

[5] Ecology, *Evaluating the Human Health Toxicity of the Carcinogenic PAHs (cPAHs) Using Toxicity Equivalency Factors (TEFs), Implementation Memorandum #10, Publication No. 15-09-049*, April 20, 2015; Implementation Memorandum #10: Evaluating the Human Health Toxicity of Carcinogenic PAHs (cPAHs) using Toxicity Equivalency Factors (TEFs) (wa.gov)

- Section 6.2, or a separate section, should include the proposed construction detail of the monitoring wells.

  At a minimum, the description should include the well borehole diameter and depth, well casing and screen diameter, proposed screen interval, the well capping and surface protection, and the construction materials for monitoring well screen, casing, filter pack, and sealing. The monitoring well construction should meet the minimum requirements in accordance with WAC 173-160. The monitoring wells should be installed by a Washington-state licensed driller.

- Section 6.2, or a separate section, should include the procedure for monitoring well development. Monitoring wells should be developed no sooner than 24 hours after well completion. Monitoring wells should not be sampled for 48 hours after well development to allow the groundwater geochemistry to stabilize.

- Ecology recommends inclusion of a contingency in the event that no groundwater is encountered during drilling of the monitoring well borings. Ecology recommends advancing the borehole to a maximum depth of 50 feet bgs to determine the presence/absence of groundwater at the drilling location.

- Section 7.1 of the *April 2021 SAP* should also include Equipment Blanks (EB) as field quality control samples. One sample of EB should be collected each day, by collecting deionized water poured over or through decontaminated field sampling equipment (e.g. split spoon sampler, tubing), to assess the adequacy of the decontamination process. If dedicated tubing is used for each monitoring well, EB is not needed for groundwater sampling.

Please address the aforementioned comments in a revised SAP or a SAP addendum, and submitted for Ecology's review. After addressing the comments, the scope of work proposed in the *April 2021 SAP* should sufficiently address the data gaps specified in the *March 2021 FA letter*.

Again, Ecology appreciates your effort to move forward with the Site cleanup. Ecology is looking forward to working with you during the future Site characterization work, cleanup actions and Site closure.

Limitations of the Opinion

1. Opinion does not settle liability with the state.

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

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

To settle liability with the state and obtain protection from contribution claims, a person must enter into a consent decree with Ecology under RCW 70A.305.040(4).

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

To recover remedial action costs from other liable persons under MTCA, one must demonstrate that the action is the substantial equivalent of an Ecology-conducted or Ecology-supervised action. This opinion does not determine whether the action you performed is substantially equivalent. Courts make that determination. *See* RCW 70A.305.080 and WAC 173-340-545.

3. State is immune from liability.

The state, Ecology, and its officers and employees are immune from all liability, and no cause of action of any nature may arise from any act or omission in providing this opinion. *See* RCW 70A.305.170(6).

Contact Information

Thank you for choosing to clean up the Site under the Voluntary Cleanup Program (VCP). After you have addressed our concerns, you may request another review of your cleanup. Please do not hesitate to request additional services as your cleanup progresses. We look forward to working with you.

For more information about the VCP and the cleanup process, please visit our web site: www.ecy.wa.gov/programs/tcp/vcp/vcpmain.htm. If you have any questions about this opinion, please contact me by phone at (206) 594-0100 or email at jing.song@ecy.wa.gov.

Sincerely,

Jing Song
Site Manager
Toxics Cleanup Program, NWRO

Enclosures (2): A – Description and Diagrams of the Site
B – Basis for the Opinion: List of Documents

cc: Malarie Isas, Russell Square Consulting, Inc. (malarie@russellsquareconsulting.com)
Shawn Williams, Krazan and Associates, Inc. (shawnwilliams@krazan.com)
Krista Webb, Krista Webb Consulting (kristaleewebb@gmail.com)

Enclosure A

Description and Diagrams of the Site

Site Description

This enclosure provides Ecology's understanding and interpretation of Site conditions and forms the basis for the opinions expressed in the letter.

Site: The Site is defined as cPAHs and arsenic released to soil. The Site consists of two contiguous north-south adjacent Kitsap County tax parcels (**Figure 1**). The north parcel (parcel number 08250140262000) is shown as "Lot 25" on **Figure 1**; the south parcel (parcel number 08250140252001) is shown as "Lot 26" on **Figure 1**.

The two parcels are referred to as the Property in this opinion letter and Site Description. The Property, which covers approximately 9.78 acres of undeveloped land, is located east of Brian Lane NW in central Kitsap County, northwest of Silverdale, Washington. No street address or number has been assigned to the Property.

Area and Property Description: The Property is heavily vegetated with overgrown blackberry bushes, weeds, tall grasses, and other dense underbrush. An approximately 1-acre area on the western portion of the Property was cleared around 2005. A primitive road crosses the Property tracking southwest to northeast. Access to the Property is via a 30-foot-wide easement from Brian Lane NW, which is located west of the Property. No utilities are provided to the Property.

The Property is bounded with undeveloped land to the north, south, and west, and single family residences to the east and southwest.

Property History and Current Use: The Property was undeveloped land since as early as 1891. A 1981 aerial photograph shows that the central portion of the Property was cleared at the time, with a building structure and a primitive road entering from the west. Aerial photographs from 1990 to the present show that the southwestern portion of the Property was cleared[1]. A historic report indicated that three abandoned building structures, including a house, a chicken coop, and a shed, were present on the Property in 1997[2]. These building structures were reportedly deteriorated and removed from the Property in June 2005[3]. The Property has been vacant since that time, and remains as undeveloped land to the present day. The locations of the former building structures are depicted on **Figure 2**.

Sources of Contamination: Contamination appears to be associated with wastes that were historically disposed of at the Site. One 55-gallon drum, reportedly containing petroleum product, was discovered and removed from the south parcel in 1997[2] (**Figure 3**). A total of eighteen 55-gallon drums were discovered and removed from the north parcel in 2005 (**Figure 2**). Several of these drums were labeled with "Roybond Primer"; but the exact content of the drums were unknown. Two debris piles were also discovered on the Property (**Figure 2**).

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[1] Associated Environmental Group, LLC, *Phase I Environmental Site Assessment, Seitz Property, Silverdale, Washington*, July 19, 2020.

[2] Ecology and Environment, Inc., *Silverdale Dump Site Removal Site Assessment Trip Report*, October 30, 1997.

[3] EnviroSound Consulting Inc., *Site Soil Investigation, Seitz Property, Silverdale, Washington,* November 30, 2015.

These debris piles appeared to contain solid waste such as tires, trash, and vehicles. The debris piles appeared to be removed from the Property at an unknown time. The COCs on the Site identified to date include arsenic and cPAHs in soil.

Physiographic Setting: The Site gently slopes to the east from an elevation of approximately 230 feet to 175 feet above mean sea level (amsl). The land surface in the vicinity of the Property is generally sloping to the east-northeast.

Surface/Storm Water System: The nearest surface water body is a tributary to Clear Creek that runs northwest to southeast approximately 1,000 feet northeast of the Site. Based on the topography, storm water runoff on the Property flows to the east toward Clear Creek.

Ecological Setting: The Site is located in a rural residential area. The Property and nearby properties to the north, south, and west are undeveloped, with heavy vegetation and bushes that is likely to attract wildlife. The properties to the east and southwest are developed with single family residences.

Geology: The Site is in the region of the Puget Lowlands, an elongated topographic and structural depression filled with complex sequences of glacial and non-glacial sediments that overlie bedrock. Continental ice sheets up to 3,000 feet thick covered portions of the Puget Lowland several times during the Quaternary period. Retreating ice carved new landscapes, rechanneled rivers, drained or formed lakes, and deposited glacial drift including till and outwash. According to the Geologic Map of Kitsap County, the Property and vicinity area are underlain by Pleistocene-aged continental glacial till[4].

Based on field observations during trenching and a soil boring installation at the Site, subsurface soil consists of 0 to 3 feet of top soil, followed by a layer of silty sand with gravel to approximately 17 feet bgs, which is interpreted as glacial till. Underneath the till to the total explored depth of 20 feet bgs is a medium to coarse sand layer where groundwater occurs[5].

Groundwater: No permanent groundwater monitoring wells haven been installed at the Site. In March 2018, a direct push soil boring was advanced at the Site. The soil boring was completed to a total depth of 20 feet bgs, with a static water level at approximately 12 feet bgs[5].

More than 20 water wells are located within a 1/2-mile radius of the Site. Two water wells that are closest to the Site include (**Figure 1**):

- A Landsworth Creek water system well: This well is located approximately 500 feet east of the Site at an approximate elevation of 150 amsl. This well was completed to a total depth of 168 feet bgs[6].

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[4] Kitsap County Department of Community Development, *Geologic Map Units, Kitsap County, Washington*, April 11, 2017; https://www.kitsapgov.com/dcd/DCD GIS Maps/Geologic_Map_Units.pdf.

[5] Ecology, *Resource Protection Well Report, Notice of Intent Number: EE07072, Seitz Property, Silverdale, WA 98383*, March 8, 2018.

[6] Washington State Department of Health, *Office of Drinking Water database, Sentry Internet*;

- A Brianwood water system well: This well is located approximately 700 feet southwest of the Site at an approximate elevation of 250 amsl. This well was completed to a total depth of 125 feet bgs and screened from 91 to 101 feet bgs, with a static water level at 55 feet bgs[7].

Water Supply: No water is provided to the Property. Drinking water for the nearby residential and commercial properties is supplied by multiple water supply systems[8], including:

- Group A water supply systems: the Silverdale Water District #16, the Allevena water system, the Brianwood water system, the Crystal Creek water system, the Clear Creek Baptist Church water system, and the Silverdale Pee Wees water system.

- Group B water supply systems: the Landsworth Creek water system, the Collins Water system, the Frontier water system.

The Silverdale Water District #16 is currently sourced from 12 water supply wells with static water levels ranging from 69 to 484 feet bgs[9]. Other water system is sourced from one water supply well; these water supply wells were completed to total depths from 51 to 168 feet bgs[6,8].

The southwestern portion of the Property is located within the 10-year time-of-travel wellhead protection zone of the Crystal Creek water system and Brianwood water system wells. The eastern portion of the Property is located within the wellhead protection zone of the Landsworth Creek water system well[8].

Based on the well logs from nearby water wells (the Brianwood water system well[7] and the Silverdale Pee Wees water system well[10]), a layer of sandy clay is present from approximately 20 to 50 feet bgs, and again from approximately 60 to 80 feet bgs. The sandy clay layers may be confining units separating aquifers which are generally comprised of sand and gravel.

Release and Extent of Contamination: Environmental assessments have been conducted at the Site since 1997. The following lists Site investigation and regulatory history in chronological order:

- In 1985 and 1986, when the Property was owned by a previous owner, complaints were made by a neighboring property owner to the Kitsap County Health District (KCHD) alleging that illegal dumping was being conducted on the Property. KCHD was unable to substantiate the claims of illegal burial of drums and cylinders at the time.

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https://fortress.wa.gov/doh/eh/portal/odw/si/Intro.aspx

[7] Ecology, *Water Well Report, Well Tag #ACD356*, June 9, 1980.

[8] Washington State Department of Health, *Source Water Assessment Program (SWAP) database map*; SWAP Map

[9] Silverdale Water District, *2019 Silverdale Water District Annual Drinking Water Quality Report*, June 2020.

[10] Ecology, *Water Well Report, Silverdale Pee Wee Cub*, August 24, 1982.

- In August 1997, the Property owner at the time was notified by the EPA that there were allegations of illegal dumping on the Site. As a result, a Site investigation was conducted on behalf of EPA.

    - The investigation included clearing brush and debris, conducting a geophysical survey, and digging three trenches to a maximum length of 100 foot and a maximum depth of 11 feet bgs on the Site. The geophysical survey and trenching did not find buried drums and cylinders. The locations of the trenches are depicted as "E&E 1997 Trench #1, 2, and 3" on **Figure 2**.

    - One 55-gallon drum discovered west of the former house was reportedly approximately ¼ full (**Figure 3**). One sample was collected from the drum. The analytical results were consistent with a diesel or heating oil type of petroleum product. The drum was recycled at the time.

- In March and April 2005, Ecology and KCHD conducted an initial Site investigation.

    - On March 14, 2005, KCHD received complaints from a neighbor that solid waste was uncovered at the Site due to land-clearing activities. KCHD visited the Site on March 18 and confirmed the presence of several piles of trash and rubbish. KCHD contacted the Property owner at the time to inquire about the status of the waste; the owner related that he was planning on developing the Property and cleaning up the solid waste.

    - On March 25, 2005, the owner informed KCHD that additional brush-clearing activities revealed a 10- by 10-foot area where eighteen 55-gallon drums were discovered. The area is depicted as "Former Drum Storage Area" on **Figure 2**. KCHD inspected the drums on March 28; all drums were full or close to full. Four of the drums reportedly showed signs of leakage or spillage. Several drums were labeled with "Roybond Primer". The area around the drums reportedly smelled of solvents. KCHD provided the information to Ecology.

    - On March 29, 2005, a nearby property owner contacted Ecology reporting the drums found by the owner and alleged additional drums (dumped in 1985 to 1986) were still buried on the Site. The complaint suggested that the 1997 trenching area was not in the alleged dumping area.

    - As a result of the initial investigation, Ecology listed the Site on the Confirmed and Suspected Contaminated Sites List in April 2005, and requested KCHD to conduct a Site Hazard Assessment (SHA).

- KCHD conducted the SHA from August 2005 to February 2006.

    - During the time of SHA, the owner removed the 18 drums on August 17, 2005, and also demolished the building structures in June 2005.

- A ground penetrating radar and magnetic survey was conducted in August 2005 in areas that were not covered by the 1997 geophysical survey and trenching. No buried metallic objects and no signs of excavation were found. The 2005 survey area is depicted on **Figure 2**.

- Five soil samples (SP1 through SP5) were collected from the cleared areas of the Site from ground surface to 1 foot bgs. The sampling locations are depicted as "KCHD SP-1 through SP-5" on **Figure 2**. Two of the soil samples were collected from the former drum storage area; two were from the areas of the debris piles; and one was from the former house area. One soil sample, SP2, contained a cPAHs TEQ concentration above the MTCA Method A soil cleanup level.

- Two groundwater samples were collected from the two closest drinking water wells, respectively (**Figure 1**). The water sample collected from the Landsworth Creek water system well (east of the Site) contained arsenic and cPAHs TEQ concentrations above the MTCA Method A groundwater cleanup levels. Please note the cPAHs TEQ in a blank water sample also exceeded the MTCA Method A groundwater cleanup level.

- As a result of the SHA, Ecology listed the Site on the Hazardous Sites List in February 2006, with a hazard ranking of 2 (moderate to high risk).

- In June to October 2015, soil sampling and excavation were conducted at the Site.

  - In June and July 2015, seven soil samples were collected at five locations (SL-1, S1-SL-1.5, SL-2, SL-3, and SL-4) within or near the former drum storage area from the ground surface to 1.5 feet bgs (**Figure 2**). The soil samples collected at the ground surface from locations SL-1 and SL-2 contained arsenic concentrations above the MTCA Method A soil cleanup level.

  - Two soil samples (DP1-S5-SL-09 and DP2-S6-SL-11) were collected from the areas of two debris piles, respectively. One soil boing (SP5-S7-SL-13) was collected near the former house. All three soil samples were collected at the ground surface, and all contained arsenic concentrations above the MTCA Method A soil cleanup level. These soil sampling locations are depicted as "DP-1, DP-2, and SP-5" on **Figure 4**.

  - In October 2015, approximately 5.5 cubic yards of contaminated soil were removed from the former drum storage area. The excavation was completed to a size of 10-feet by 10-feet, and to a depth of 1.5 feet bgs. The excavation was not backfilled[11].

    Two confirmation soil samples (DSA-S5 and DSA-S6) were collected at the bottom of the excavation at 1.5 feet bgs (**Figure 2**). The soil samples did not contain detectable cPAHs. No arsenic analysis was conducted on these confirmation samples.

[11] Email Correspondence from Krista Webb, February 12, 2021.

- The owner submitted the investigation results, and entered the Site in Ecology's Voluntary Cleanup Program (VCP) in March 2016. The Site was assigned a VCP project number of #NW3037. Ecology issued a *Further Action opinion letter* on June 22, 2016 to request additional work. This VCP agreement was terminated on December 3, 2018 due to lack of active cleanup activities.

- In March 2018, a direct-push soil boring was advanced to 20 feet bgs at the east side of the former drum storage area[12]. One groundwater sample was collected from the soil boring.

  - The groundwater sample was analyzed for TPHg, TPHd, TPHo, BTEX, arsenic, and PAHs.

  - Concentrations of TPHg and BTEX were detected above the laboratory practical quantitation limit (PQL) but below the MTCA Method A groundwater cleanup levels.

  - Concentrations of TPHd, TPHo, PAHs, and arsenic were detected below the laboratory PQL. However, the PQL for TPHd plus TPHo (750 micrograms per liter (µg/L)) was above the MTCA Method A groundwater cleanup level (500 µg/L).

- In June to September 2020, a Phase I Environmental Site Assessment was conducted for the Site, and a letter report was prepared to summarize existing Site data. The Site re-entered Ecology's VCP on October 1, 2020 and was assigned a VCP project number of #NW3293.

- In October 2020, exploratory test pits were excavated on Site as part of a geotechnical engineering investigation (**Figure 4**). No visible evidence of contamination was observed in the test pits and no visible evidence of drums were reportedly noted. Soil samples were not collected from the test pits.

- In November 2020, nine soil samples (CS-1 through CS-9) were collected in the former drum storage area at ground surface to 1.5 feet bgs, and analyzed for arsenic (**Figure 2**). None of the soil samples contained detectable arsenic.

- In April 2021 during a Property ownership transfer, the VCP agreement for #NW3293 was terminated. The Site re-entered the VCP on April 27, 2021, and was assigned a VCP project number of #NW3313.

[12] Email Correspondence from Krista Webb, *Re: Groundwater sample at Seitz site*, January 14, 2021.

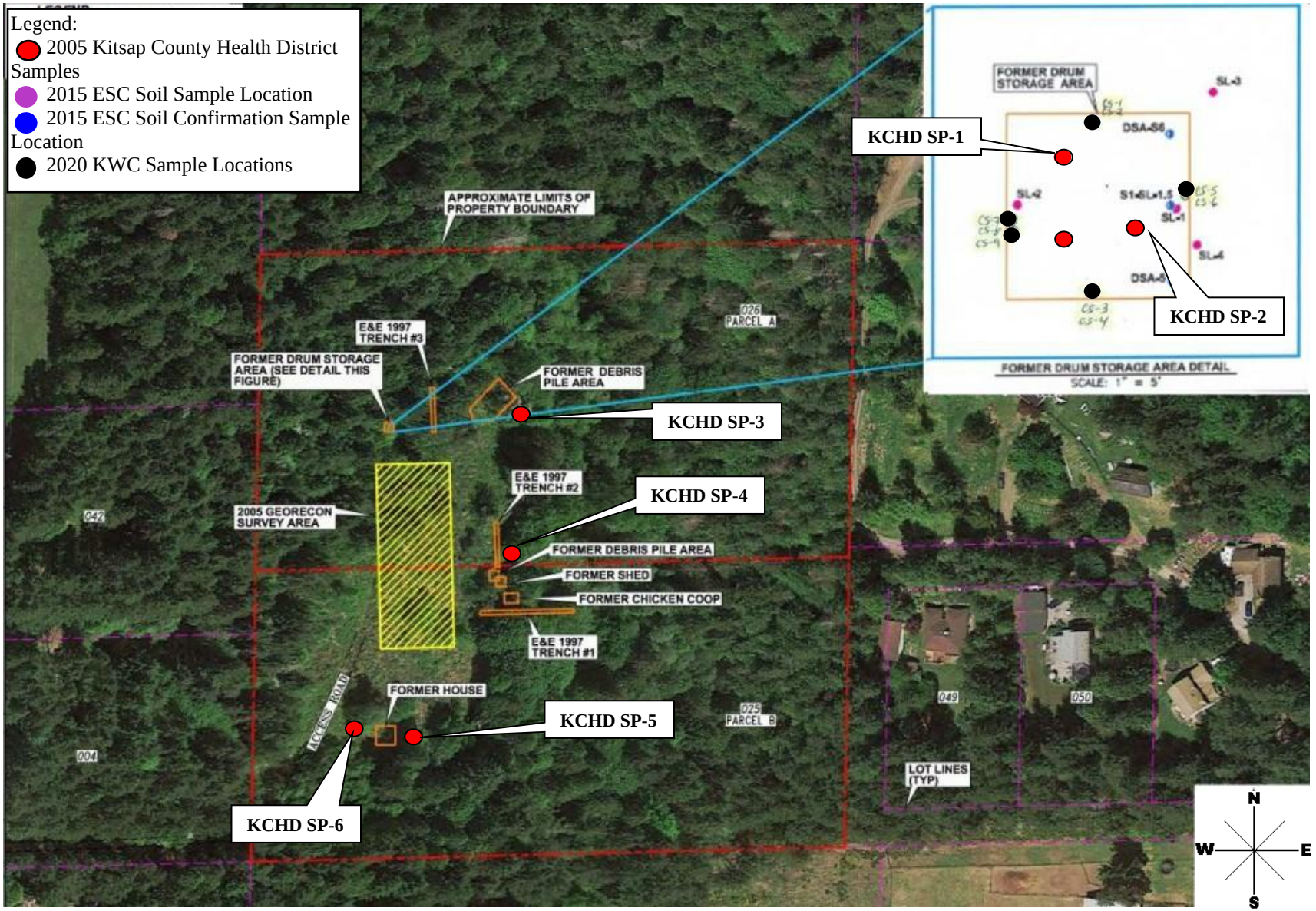
Site Diagrams

Enclosure A: Figure 1

Source: Google Maps

VICINITY MAP	Scale: NTS	Date: April 2021	Krazan
Seitz Property – Lots 25 & 26 **Sampling and Analysis Plan** **Brian Lane** **Silverdale, Washington**	**Modified by:** CB	**Approved by:** SEW	**SITE DEVELOPMENT ENGINEERS** ***Conducting Assessments Nationwide***
	Project No. 104-21020	**Figure No.** 1	

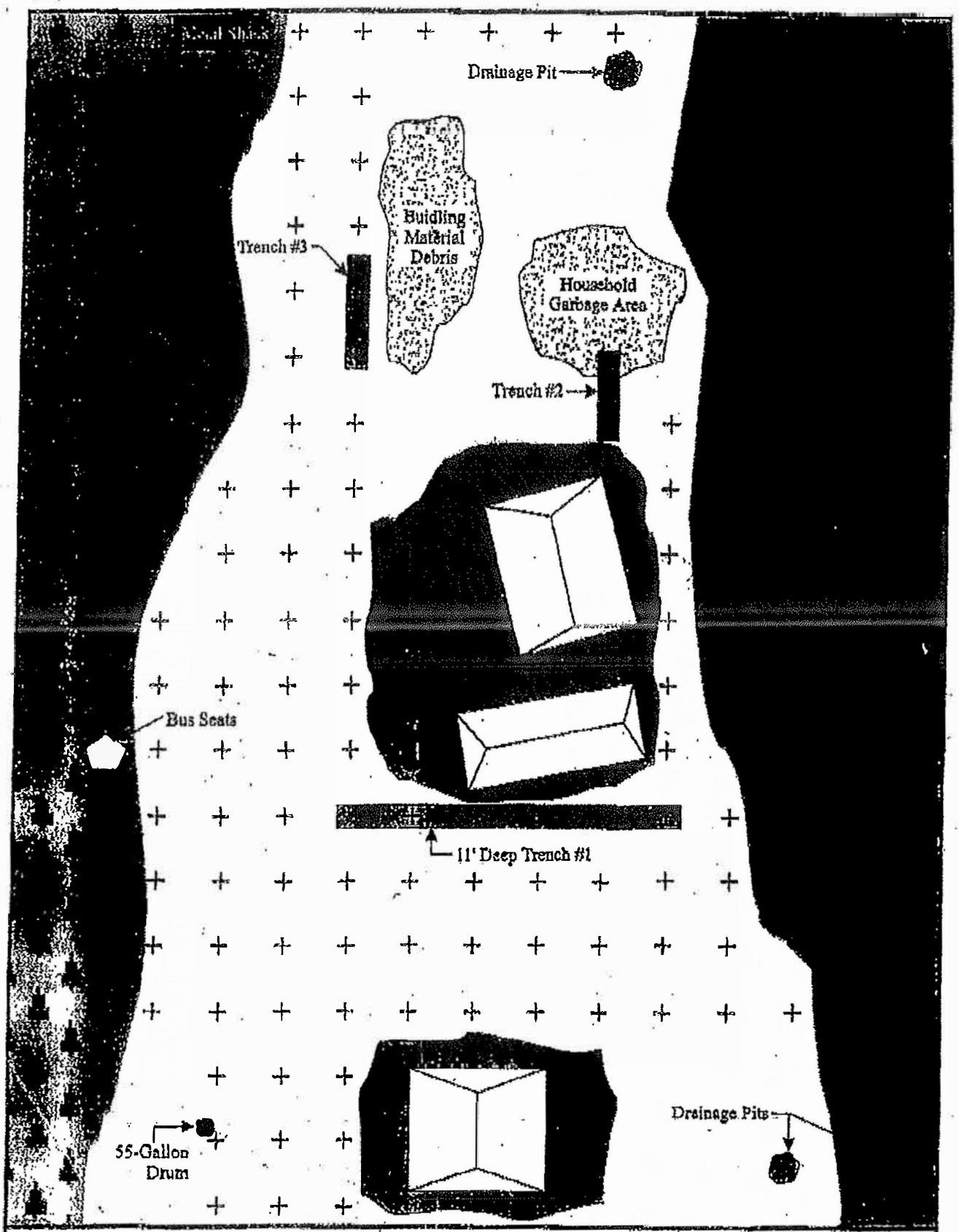
Enclosure A: Figure 2



Source: Google Maps

SITE MAP-Previous Sampling Locations	**Scale:** NTS	**Date:** April 2021	Krazan
Seitz Property – Lots 25 & 26 Sampling and Analysis Plan Brian Lane Silverdale, Washington	**Drawn by:** CB	**Approved by:** SEW	**SITE DEVELOPMENT ENGINEERS** ***Conducting Assessments Nationwide***
	Project No. 104-21018	**Figure No.** 3	

Enclosure A: Figure 3



ecology and environment, inc.
International Specialists in the Environment
Seattle, Washington

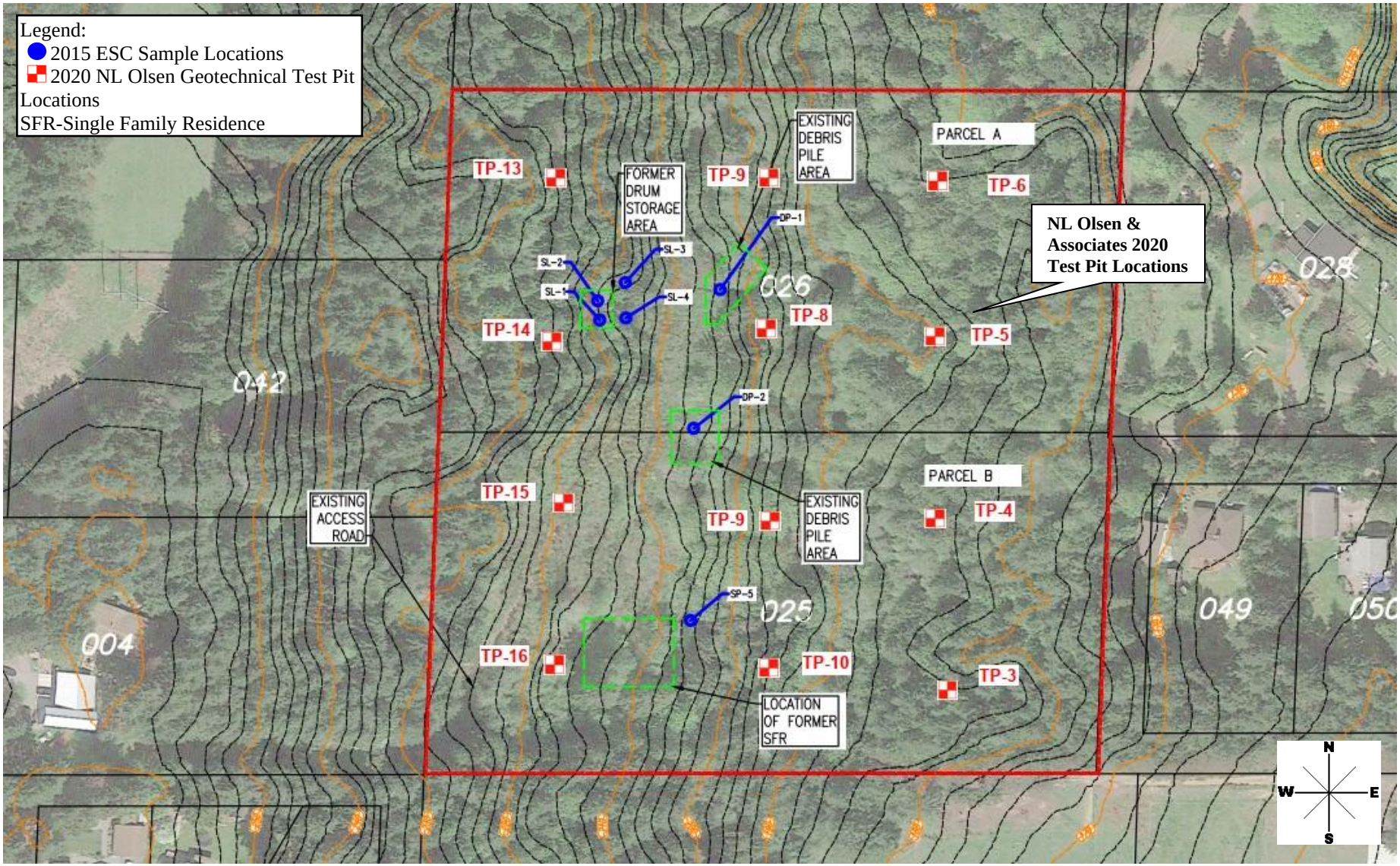
SILVERDALE DUMP SITE
Silverdale, Washington

Figure 2
SITE MAP

No Scale Used

Drawn:	DATE:	JOB NO.	Dwg.No.
MRE	10/29/97	BF0901SFT0	B F0901F2

Enclosure A: Figure 4



Source: Google Maps

SITE MAP-Previous Sampling Locations	**Scale:** 1"=100'	**Date:** April 2021	Krazan **SITE DEVELOPMENT ENGINEERS** ***Conducting Assessments Nationwide***
Seitz Property – Lots 25 & 26 Sampling and Analysis Plan Brian Lane Silverdale, Washington	**Drawn by:** CB	**Approved by:** SEW	
	Project No. 104-21018	**Figure No.** 4	

Enclosure B

Basis for the Opinion:
List of Documents

1. Ecology and Environment, Inc., *Silverdale Dump Site Removal Site Assessment Trip Report*, October 30, 1997.

2. Washington State Department of Ecology (Ecology), *Environmental Report Tracking System (ERTS) #547121, Seitz Property, Brian Kane NW, Silverdale, Washington*, March 29, 2005.

3. Kitsap County Health District (KCHD), *Sampling and Analysis Plan, Seitz Property SHA, No Address, Kitsap County Tax Parcel ID# 082501-4-025-2001, Silverdale, Washington*, November 3, 2005.

4. KCHD, *Site Hazard Assessment, Seitz Property, off Brian Lane, Silverdale, WA*, February 7, 2006.

5. EnviroSound Consulting Inc., *Site Soil Investigation, Seitz Property, Silverdale, Washington*, November 30, 2015.

6. Ecology, *Re: Further Action at the following Site: Seitz Property, Brian Lane NW, Silverdale, WA 98383*, June 22, 2016.

7. Ecology, *Re: Request for Information on Status of VCP Project for the following Site: Seitz Property, Brian Lane NW, Silverdale, WA 98383*, January 16, 2018.

8. Ecology, *Resource Protection Well Report, Seitz Property, Silverdale, WA 98383*, March 8, 2018.

9. ESN Northwest Chemistry Laboratory, *Groundwater Sample Laboratory Analytical Results, Project Silverdale, Washington*, March 12, 2018.

10. ESN Northwest Chemistry Laboratory, Gro*undwater Sample Laboratory Analytical Results, Project Silverdale, Washington*, March 13, 2018.

11. Ecology, *Re: VCP Customer Response to Ecology Request for Information on Status of VCP Project for the following Site: Seitz Property, Brian Lane NW, Silverdale, WA 98383*, June 25, 2018.

12. Ecology, *Re: Termination of VCP Agreement for the following Site: Seitz Property, Brian Lane NW, Silverdale, WA 98383*, December 3, 2018.

13. Letter from Andrew Seitz, *Seitz Property – Silverdale*, April 11, 2019.

14. Ecology, *Re: Seitz Property, Brian Lane NW, Silverdale, WA 98383*, April 25, 2019.

15. Associated Environmental Group, LLC, *Phase I Environmental Site Assessment, Seitz Property, Tax Parcels 08250140252001 and 08250140262000, Silverdale, Washington 98383*, July 19, 2020.

16. Krista Webb Consulting (KWC), *Letter Report, Seitz Property, Brian Lane NW, Silverdale, Washington, Kitsap County Parcel IDs: 082501-4-026-2000 and 082501-4-25-2001*, September 22, 2020.

17. KWC, *Letter Report, Seitz Property, Brian Lane NW, Silverdale, Washington, Kitsap County Parcel IDs: 082501-4-026-2000 and 082501-4-25-2001*, November 19, 2020.

18. Ecology, *Re: Further Action at the following Site, Seitz Property, Brian Lane NW, Silverdale, WA 98383, VCP #NW3293*, March 9, 2021.

19. Krazan & Associates, Inc., *Sampling and Analysis Plan, Soil and Groundwater Sampling, Lots 25 and 26, Seitz Property, Brian Lane NW, Silverdale, Washington*, April 26. 2021.