FARALLON CONSULTING

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ENVIRONMENTAL MEDIA MANAGEMENT PLAN

NLG PROJECT 1 PROPERTY
8005 AND 8075 161ST AVENUE NORTHEAST
REDMOND, WASHINGTON

Submitted by:
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975 5th Avenue Northwest
Issaquah, Washington 98027

Farallon PN: 650-026

For:
Red Center Village #1 LLC
16508 Northeast 79th Street
Redmond, Washington 98052

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1.0 INTRODUCTION

Farallon Consulting, L.L.C. (Farallon) has prepared this Environmental Media Management Plan (EMMP) on behalf of Red Center Village #1 LLC for the NLG Project 1 Property at 8005 and 8075 161st Avenue Northeast in Redmond, Washington (herein referred to as the Property) (Figure 1). This EMMP was prepared pursuant to the recommendation from the Washington State Department of Ecology (Ecology) in a letter regarding Nelson Legacy Group (NLG) Project One, File # SEPA-2020-00898, Ecology SEPA #202102861 dated June 11, 2021, from Katelynn Piazza of Ecology to Benjamin Sticka of City of Redmond (Ecology 2021). Though impacted media are not expected to be encountered during proposed construction activities at the Property, the purpose of the EMMP is to provide protocols for managing potentially impacted media in the event that disturbance of impacted soil and/or groundwater occurs during planned construction activities at the Property.

Farallon understands that the Property will soon be redeveloped as an eight-story apartment building with a one-level below ground parking structure (Middour 2021). The construction activities will include excavation to a depth between 13 and 15 feet below existing grade for construction of the below ground parking structure (Ground Support PLLC 2021). The footprint of the excavation will extend approximately 170 feet east-west along the southern Property boundary adjacent to Redmond Way, approximately 280 feet north-south along the eastern Property boundary adjacent to 161st Avenue Northeast, approximately 285 feet east-west roughly parallel to the northern Property boundary, and approximately 280 feet north-south roughly parallel to the west Property boundary. Additionally, two elevator pit excavations will be completed extending to a depth of 16.5 feet below existing grade. The elevator pits are central to the northeastern and southwestern quadrants of the larger excavation.

To facilitate excavation and construction activities, temporary construction dewatering will be conducted. A temporary dewatering system will be installed consisting of 16 dewatering wells along the perimeter of the excavation and new building (Middour 2021).

This EMMP summarizes protocols for management of environmental media if concentrations of hazardous substances are encountered during Property construction activities.

1.1 PURPOSE

The purpose of this EMMP is to:

- Provide guidance for the identification, sampling, and analysis of environmental media that may contain concentrations of hazardous substances;
- Describe procedures for the segregation and staging of media that may contain concentrations of hazardous substances pending confirmation through laboratory analysis;
- Describe options and procedures for the disposal of impacted soil off the Property and treatment of impacted groundwater for discharge to sanitary sewer; and

- Present the requirements for documentation of the sampling, analysis, and disposal of impacted media.

1.2 ORGANIZATION

The EMMP is organized into the following sections:

Section 2, **Property Description and Background**, presents the Property description, a summary of previous environmental investigations conducted at the Property, and a summary of the Property geology and hydrogeology.

Section 3, **Technical Elements**, identifies the applicable or relevant and appropriate requirements (ARARs) hazardous substances that are known or suspected to be in environmental media at the Property, and roles and responsibilities for implementing the Property redevelopment.

Section 4, **Environmental Media Management Plan Implementation**, provides protocols for implementation of the EMMP, including the identification, sampling, analysis, segregation, storage, and disposal off the Property of impacted soil and sampling, analysis, treatment, and disposal through discharge to the sanitary sewer system for impacted groundwater.

Section 5, **Documentation Requirements**, describes the documentation requirements for field work.

Sections 6, **References**, includes the references cited in this EMMP.

Section 7, **Limitations**, provides Farallon's standard limitations for this EMMP.

2.0 PROPERTY DESCRIPTION AND BACKGROUND

The following sections provide the Property description, a summary of previous environmental investigations conducted at the Property, and a summary of the Property geology and hydrogeology.

2.1 PROPERTY DESCRIPTION

The Property is located at 8005 and 8075 161st Avenue Northeast in Redmond, Washington. The Property comprises King County Tax Parcel Nos. 022505-9126 and 719890-0300, which total 1.39 acres of land developed with a 4,630-square-foot one-story retail building and a 350-square-foot one-story drive-through structure, both constructed in 1969, and a 4,900-square-foot one-story restaurant structure that was constructed in 1972. Remaining areas of the Property consist of paved parking and landscaped areas. Access to the Property is from 161st Avenue Northeast, east of the Property, and Redmond Way, south of the Property. According to the King County Department of Assessments, the parcel associated with address 8005 161st Avenue Northeast is owned by Central Valley Annex LLC and the parcel associated with address 8075 161st Avenue Northeast is owned by Houghton Lane LLC.

According to the *Phase I Environmental Site Assessment Report, 8005 161st Avenue Northeast Redmond, Washington* dated May 18, 2015, prepared by Farallon (Farallon 2015a; 2015 Phase I ESA Report), the Property appeared to be undeveloped from 1895 through 1968 based on the U.S. Geological Survey topographic maps of Snohomish, Washington dated 1895 and Seattle, Washington dated 1897 and aerial photographs reviewed, with a small structure possibly present in 1965. By 1978, the existing structures and parking areas appeared developed on the Property and have remained relatively unchanged to the present. The three structures on the Property are currently unoccupied. The retail building was historically occupied by various banks and was most recently occupied from 2003 to July 6, 2021 by AquaQuip, a retail company that sells barbecues, hearths, spas, and pool and spa chemicals. The drive-through structure was most recently occupied by Cascade Grind, a coffee company. The restaurant structure was most recently occupied by Grand Peking, a restaurant.

Stormwater runoff via sheet flow is captured by catch basins in the drive-through lane between the two buildings at the Property, and a catch basin in the parking area east of the retail building. The catch basins are connected to a storm drain system in the rights-of-way of Redmond Way and 161st Street Northeast.

2.2 PREVIOUS INVESTIGATIONS

This section provides a summary of previous environmental investigations conducted at the Property by Farallon. Boring and soil gas sample locations are shown on Figure 2. Analytical results for soil samples are presented in Table 1. Reconnaissance groundwater analytical results are presented in Table 2. Subslab soil gas analytical results are presented in Table 3. Additional

information pertaining to the investigation activities are provided in the documents referenced below.

2.2.1 2015 Phase I Environmental Site Assessment

The 2015 Phase I ESA Report identified the following recognized environmental conditions from off-Property releases that could potentially affect the Property:

- The known release of petroleum hydrocarbons to the subsurface associated with the Chevron gasoline service station operating west-adjacent to the Property;
- The location of a historical gasoline station approximately 150 feet southeast of the Property; and
- The area-wide presence of a low-concentration plume of tetrachloroethene (PCE) in groundwater in the Property vicinity that could affect indoor air quality in buildings on the Property.

The 2015 Phase I ESA Report did not identify any recognized environmental conditions associated with operations at the Property.

2.2.2 2015 Subsurface Investigation

Farallon conducted a subsurface investigation at the Property in 2015 to investigate potential subsurface contamination associated with recognized environmental conditions identified in connection with the Property in the 2015 Phase I ESA Report. According to the *Subsurface Investigation Report, 8005 161st Avenue Northeast Redmond, Washington* dated July 1, 2015, prepared by Farallon (Farallon 2015b; 2015 SI Report), Farallon advanced two borings, FB-1 and FB-2, on the western portion of the Property adjacent to the Chevron gasoline station for collection of soil and reconnaissance groundwater samples. Farallon also installed one temporary soil gas probe in the retail building foundation slab for collection of a subslab soil gas sample.

Total petroleum hydrocarbons as gasoline-range organics (GRO) (identified by the laboratory as turpentine) and as oil-range organics (ORO) were detected at concentrations less than the Washington State Model Toxics Control Act Cleanup Regulation (MTCA) Method A cleanup levels in the soil sample collected from boring FB-2 at a depth of 12.5 feet below ground surface (bgs).

PCE was detected at concentrations less than the MTCA Method A cleanup level in reconnaissance groundwater samples collected from the two borings. The concentrations of PCE detected were consistent with the area-wide low-concentration PCE plume in groundwater and were not indicative of potential sources that would be associated with the Property.

PCE, toluene, and m,p-xylene were detected at concentrations less than their respective MTCA Method B residential screening levels protective of indoor air in a soil gas sample collected from beneath the retail building floor slab. The low concentrations of these chemicals detected in subslab soil gas were not interpreted to present a risk to human health based on MTCA screening

levels, and no mitigation measures for the vapor intrusion pathway were implemented at the Property.

2.3 GEOLOGY AND HYDROGEOLOGY

The Puget Sound region is underlain by Quaternary sediments deposited by a number of glacial episodes. Deposition occurred during glacial advances and retreats, which created the existing subsurface conditions. The regional sediments consist primarily of interlayered and/or sequential deposits of alluvial clays, silts, and sands that typically are situated over deposits of glacial till that consist of silty sand to sandy silt with gravel. Outwash sediments consisting of sands, silts, clays, and gravels were deposited by rivers, streams, and post-glacial lakes during the glacial retreats. With the exception of the most-recent recessional deposits, the outwash sediments have been over-consolidated by the overriding ice sheets.

According to previous environmental investigations completed at the Property and discussed in Section 2.2, Previous Investigations, the general stratigraphy comprises sand with varying amounts of gravel from the ground surface to the total depth explored of 20 feet bgs. The depth to groundwater at the Property is approximately 16 feet bgs. Based on Farallon's knowledge of environmental and hydrogeological conditions at nearby facilities, the groundwater flow direction is west-northwest.

2.4 POTENTIAL SOURCES OF HAZARDOUS SUBSTANCES

An Environmental Database Report (EDR) for the Property prepared by Environmental Data Resources, Inc. dated April 15, 2015, and an EDR for nearby addresses 8010 160th Avenue Northeast and 16002 Redmond Way Northeast prepared by Environmental Risk Information Services dated October 20, 2020 identified several facilities adjacent or proximate to the Property in the regulatory databases. Reported facilities within 0.25 miles up-gradient, 0.125 mile cross-gradient, or adjacent down-gradient of the Property are considered to have a potential to have impacted the Property. Facilities that were listed in the database search report but not identified as a reported facility (e.g., a facility listed as a hazardous waste generator but not as having had a release) and facilities that were listed as "closed" were not considered to have a potential to have impacted the Property. Two facilities were identified as potential sources for the migration of hazardous substances to the Property:

- Redmond Chevron at 16000 Redmond Way; and
- Premium Tune N Lube Redmond at 16311 Redmond Way.

Additionally, an area-wide groundwater PCE plume that underlies the Property was identified in the 2015 Phase I ESA Report.

The potential sources of hazardous substances to the Property are discussed in greater detail below.

2.4.1 Redmond Chevron at 16010 Redmond Way

An active Chevron gasoline station is located adjacent to the southwestern boundary of the Property. The Chevron gasoline station is enrolled in the Pollution Liability Insurance Agency Petroleum Technical Assistance Program and assigned Facility Site ID 39354263. The Chevron gasoline station has confirmed releases of petroleum hydrocarbons to groundwater, with historic detections of benzene and lead detected at concentrations exceeding MTCA cleanup levels in groundwater. Farallon reviewed historic groundwater and soil sampling data that were available at the time of preparation of this EMMP. Benzene and lead have not been detected at concentrations exceeding their respective MTCA Method A cleanup levels in groundwater at the Chevron gasoline station since 2007 (Arcadis 2020). Total lead has historically been detected at concentrations exceeding the MTCA Method A cleanup level in groundwater samples collected from a monitoring well installed approximately 16 feet west of the boundary with the Property; however, dissolved lead was not detected in the same groundwater samples (Arcadis 2020). There were no other detections of contaminants associated with the Chevron gasoline station in the soil or groundwater samples collected from that monitoring well (Arcadis 2020). Based on the available information, it does not appear that confirmed releases at this facility have affected the soil and/or groundwater quality at the Property.

2.4.2 Premium Tune N Lube Redmond at 16311 Redmond Way

Premium Tune N Lube Redmond at 16311 Redmond Way was a former oil change facility approximately 1,200 feet east-southeast of the Property. The facility is assigned Cleanup Site ID 967 and is identified as having a confirmed release of unspecified petroleum hydrocarbons to soil and suspected release of unspecified petroleum hydrocarbons to groundwater. No environmental sampling data associated with this former oil change facility were available for review at the time of preparation of this EMMP. Due to the distance, the confirmed releases at this facility are not likely to have affected the soil and/or groundwater quality at the Property.

2.4.3 Area-Wide PCE Groundwater Plume

An area-wide plume of PCE in groundwater at concentrations less than the MTCA Method A cleanup level and the surface water criterion is present underlying the Property (Farallon 2015b). This area-wide plume emanates from unidentified sources up-gradient of the Property. Concentrations of PCE detected in groundwater at the Property in 2015 were consistent with the area-wide low-concentration PCE plume in groundwater (Farallon 2015b).

3.0 TECHNICAL ELEMENTS

This section provides a summary of the technical elements applicable to management of media with concentrations of hazardous substances.

3.1 APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS

Farallon understands that construction activities will be conducted by a contractor retained by Red Center Village #1 LLC and that ground disturbance is proposed. If impacted media are encountered, handling and disposal of soil and groundwater during construction activities will be conducted in accordance with applicable local permit requirements and the following applicable primary ARARs:

- MTCA, Chapter 70.105D of the Revised Code of Washington (RCW 70.105D);
- MTCA, Washington Administrative Code (WAC) 173-340;
- Washington State Solid Waste Management Laws and Regulations, RCW 70.95, WAC 173-351, and WAC 173-304; and
- The Toxic Substances Control Act of 1976.

These primary ARARs are anticipated to be the most applicable because they provide the framework for materials management during construction activities, including applicable and relevant regulatory guidelines, waste disposal criteria, references for additional ARARs, and standards for documentation of waste disposal activities.

Other applicable ARARs for Property construction activities include the following:

- Occupational Safety and Health Act, Part 1910 of Title 29 of the Code of Federal Regulations (29 CFR 1910);
- Safety Standards for Construction Work, WAC 296-155;
- Washington State Dangerous Waste Regulations, WAC 173-303,
- Washington State Minimum Standards for Construction and Maintenance of Wells, WAC 173-160; and
- Accreditation of Environmental Laboratories, WAC 173-50.

3.2 HAZARDOUS SUBSTANCES AND MEDIA OF CONCERN

The hazardous substances for concern are defined as chemicals that have been detected in media at the Property. The following hazardous substances have been confirmed in soil and/or groundwater at the Property:

- GRO;

- ORO; and
- PCE.

The media of concern at the Property are soil and groundwater.

3.3 ROLES AND RESPONSIBILITIES

Construction will be managed by Maple Multi-Family Operations, LLC (Maple). Numerous subcontractors to Maple may provide a range of services during construction and implementation of the Property redevelopment. The primary subcontractors involved with implementation of the Property redevelopment will include the General Contractor, Excavation Subcontractor, and the subcontractor performing drilling services for installation of shoring elements (Shoring Subcontractor). Unimpacted soil and petroleum-contaminated soil (PCS) will be generated by the Excavation Subcontractor during the construction project.

The Excavation Subcontractor will be responsible for the means and methods for the excavation, physical segregation of PCS from unimpacted soil ex-situ, and the transport and disposal of PCS and unimpacted soil generated from the Property to comply with construction plans and specifications and per requirements of the selected disposal facilities.

Farallon is the Environmental Consultant for Red Center Village #1 LLC responsible for observing and documenting soil handling and disposal during the Property redevelopment, including during the installation of shoring elements in PCS areas, mass excavation of PCS, and loading of trucks hauling PCS for disposal off the Property.

Farallon will be responsible for notifying Red Center Village #1 LLC and Maple should non-conformance with the EMMP be observed during the Property redevelopment. Farallon's primary communication will be with Red Center Village #1 LLC and Maple and, as directed by Red Center Village #1 LLC and Maple, the Excavation Subcontractor and the Shoring Subcontractor.

Farallon field services will be limited to using results of field-screening and laboratory analytical results per Section 4.4.1, Soil Sampling; and prior soil sampling to delineate in-situ areas of PCS per the general methodology described in Section 4.4, Soil Handling. Farallon will communicate directly with Maple and as needed with the Excavation Subcontractor and/or Shoring Subcontractor during removal of PCS from the subsurface in excavation or shoring areas delineated by Farallon.

Each party involved in the implementation of the redevelopment, including Maple and subcontractors, will be responsible for the preparation and implementation of its own Health and Safety Plan per Section 5.2, Health and Safety Plan, and for compliance with other health and safety orientation requirements imposed by Maple for this project.

Contact information for key personnel involved with implementation of the redevelopment is provided below.

Owner: Red Center Village #1 LLC

Contact information:

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General Contractor: To be determined

Environmental Consultant: Farallon Consulting, L.L.C.

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4.0 ENVIRONMENTAL MEDIA MANAGEMENT PLAN IMPLEMENTATION

This section provides specific details for the implementation of this EMMP, should there be unplanned disturbance of impacted media during construction activities. This section summarizes the protocols for Property preparation; identification of potentially impacted soil; soil handling; removal, segregation, and storage of potentially impacted soil; off-Property disposal of impacted soil; analytical methods and turnaround times for soil samples collected for waste disposal; and handling of potentially impacted groundwater, if encountered.

4.1 PROPERTY PREPARATION

Prior to any construction activities, Property preparation activities, including installation of Property security, erosion control, and slope stability measures, as necessary, will be conducted to ensure traffic control and protection of workers in the work zones.

4.2 IDENTIFICATION OF POTENTIALLY IMPACTED SOIL

The 2015 Phase I ESA Report, results from the subsurface investigation conducted at the Property, and Farallon's knowledge of facilities with potential releases identified in the vicinity of the Property were used to draw conclusions about the potential impact of hazardous substances on the uses and redevelopment of the Property. GRO (identified by the laboratory as turpentine) and ORO were detected at concentrations less than MTCA Method A cleanup levels in a soil sample collected from boring FB-2 at a depth of 12.5 feet bgs near the southwestern corner of the Property (Figure 2). Some soil with concentrations of GRO and ORO is expected to be removed from the Property and will need to be handled as Category 2 PCS in accordance with the *Guidance for Remediation of Petroleum Contaminated Sites*, Publication No. 10-09-057 *dated November 2010 and* revised June 2016, prepared by Ecology (Ecology Guidance).

During excavation of soil in the area identified above, field screening will be performed to verify existing conditions in the work area, and will consist of visual and olfactory observations, including evidence of soil staining or discoloration and unusual odors not typical of decomposing natural organic material, which may indicate the presence of hazardous substances in soil. Laboratory analysis of representative soil samples may be conducted to further assess for the presence of hazardous substances in soil and determine whether soil removed from the Property may be suitable for unrestricted off-Property disposal (i.e., hazardous substances are not detected at concentrations exceeding MTCA cleanup levels or Toxic Substances Control Act regulations). Soil removed from the Property should not be exported from the Property for unrestricted disposal without confirmation soil sampling and analysis and prior authorization.

If soil in contact with the PCE groundwater plume requires excavation (e.g., to accommodate an underground parking garage), excavated soil will require handling and disposal in accordance with Washington State Dangerous Waste Regulations (WAC 173-303). Such soil will likely require disposal as Category 3 soil in accordance with Ecology Guidance.

4.3 REDEVELOPMENT ACTION SEQUENCING

The general sequence of work pertaining to Property redevelopment consists of the following main elements:

- Demolition of the existing structures on the Property;
- Installation of the temporary dewatering system and implementation of dewatering activities;
- Installation of the shoring system likely to generate PCS from drill cuttings in the area of previous boring FB-02 (Figure 2);
- Construction excavation of in-situ soil to a depth ranging from 13 to 15 feet bgs, with two smaller excavations to 16.5 feet bgs to accommodate elevator shafts; and
- Off-Property disposal of PCS in accordance with hazardous waste regulations and guidance.

Property preparation activities will be conducted by the General Contractor prior to implementation of redevelopment activities, including installation of security fencing and other measures, and implementation of erosion control and shoring and/or slope stability measures as necessary to ensure traffic control and protection of workers in the work zones. Work related to the re-routing of underground utilities (if necessary) will be completed by the General Contractor. The Property buildings and subsurface utilities no longer required will be demolished as part of the redevelopment. Hazardous building materials abatement, if necessary, will be conducted by the demolition subcontractor at the direction of the General Contractor.

4.4 SOIL HANDLING

Soil management described in this EMMP includes excavation, segregation, temporary storage, and off-Property disposal of PCS to be conducted in accordance with Washington State Solid Waste Management Laws and Regulations (Chapter 70.95 of RCW 70.95 and WAC 173-351 and 173-304), and Ecology Guidance. Management of PCS will be conducted concurrent with other construction activities such as shoring, construction stormwater management, and excavation of unimpacted soil from the Property.

Construction workers who will be exposed to PCS within an exclusion zone established and controlled by the General Contractor or designated subcontractor while performing their work must have successfully completed 40-Hour Hazardous Waste Operations and Emergency Response training in accordance with Part 1910.120 of Title 29 of the Code of Federal Regulations and have completed Annual 8-Hour Hazardous Waste Operations and Emergency Response refresher training, as needed. Health and safety regulations allow for limited exclusion zone access by untrained personnel after briefing of health and safety risks, if attended by a health and safety-trained escort, and if exposure risk is controlled to the extent practicable (e.g., prevention of air-borne impacted soil, decontamination of equipment needing a quick field repair).

A log of escorted visitors to the exclusion zone without health and safety certification and documentation of health and safety certification for workers actively working in the exclusion zone should be retained in case it is requested by a regulatory authority during implementation of the property redevelopment. Each party involved with implementation of the redevelopment activities will be responsible for the preparation and implementation of their own Health and Safety Plan per Section 5.2, Health and Safety Plan; however, Maple may require additional health and safety measures, training, and briefings for all parties participating in the redevelopment activities.

Supplemental characterization of soil, including collection of soil samples from excavations and test pits, will be conducted during the redevelopment activities to confirm and refine estimated extent of PCS if field screening indicates the potential presence of impacted soil. Soil sampling and analysis will be conducted by Farallon using equipment and an operator provided by the Excavation Subcontractor.

Excavated soil that will be transported off the Property for reuse or disposal will be segregated by category according to the Ecology Guidance and/or acceptance criteria of the disposal facility.

Three possible general categories of soil are anticipated to be managed during construction excavation and implementation of the property redevelopment:

- Category 1 Soil has no olfactory, visual, or other evidence of contamination (e.g., odor, staining, sheen, elevated photoionization detector readings) and meets criteria for reuse as clean fill or meets acceptance criteria for disposal at a facility selected by the Excavation Subcontractor. Category 1 Soil does not include PCS, is not a threat to human health or the environment as indicated by the Ecology Guidance and can be reused where allowed under other regulations. Category 1 Soil will be segregated from PCS to the maximum extent practicable and transported off the Property to the selected destination.
- Category 2 Soil contains hazardous substances at low concentrations acceptable for reuse as fill above the seasonal high-water table on commercial or industrial facilities, or if removed from the Property, can be disposed of at the Category 2 disposal facility selected by Maple, or by the Excavation Subcontractor with approval from Maple. Category 2 Soil includes PCS containing hazardous substances at concentrations meeting acceptance criteria for the Category 2 Soil disposal facility, and not meeting the criteria for handling as Category 1 Soil. Category 2 Soil also includes soil that may not contain detected concentrations of hazardous substances, but exhibits olfactory, visual, or other evidence of impact.
- Category 3 Soil is PCS containing hazardous substances at concentrations greater than acceptance criteria for disposal as Category 2 Soil, but meeting acceptance criteria for disposal as Category 3 Soil at a disposal facility selected by Maple, or by the Excavation Subcontractor with approval from Maple.

Farallon will observe PCS removal activities during the redevelopment activities, including activities conducted during excavation by the Excavation Subcontractor and drilling by the Shoring Subcontractor in select areas.

During the excavation, Farallon will perform field-screening and soil sampling (if necessary) to further refine the extent of PCS. Field-screening may consist of visual observation for evidence of soil staining or discoloration, and assessment for noticeable odors. Field-screening of PCS may include use of field instruments such as a photoionization detector for detection of volatile organic vapors. Farallon will perform soil sampling in accordance with the procedures described in Section 4.4.1, Soil Sampling.

Results of field-screening and laboratory analytical testing will be used by Farallon to delineate soil categories in-situ within the active excavation. In-situ soil categorization will be conveyed to Maple and the Excavation Contractor with a system of field markings and direct communication with equipment operators. Once the soil is excavated, the Excavation Subcontractor will maintain the temporary physical segregation of soil categories until it is loaded into trucks for off-Property disposal.

During drilling associated with the shoring installation in select areas where PCS may occur based on existing information summarized above in Section 4.2, or as observed by Farallon, Maple, or the Shoring Subcontractor, results of field-screening and laboratory analyses of performance monitoring samples will be used by Farallon to categorize soil for segregation and disposal by the Excavation Subcontractor or the Shoring Subcontractor.

Farallon understands that temporary stockpiles for excavated soil or drill cuttings generated during shoring installation will be maintained by the Excavation Subcontractor as needed to contain and segregate PCS from Category 1 Soil until PCS can be loaded into trucks and hauled to the appropriate selected disposal facility. The Excavation Subcontractor will use discretion as to the best means and methods to construct and maintain temporary stockpiles to prevent commingling of soil categories.

Farallon will complete truck manifest forms pre-signed by Maple and provide the documentation to truck drivers for each load of PCS transported off the Property for disposal. Farallon will maintain a daily summary field log of PCS transported off the Property and use truck manifests to track quantities of PCS transported to disposal facilities. These records will be used to cross-check disposal quantities invoiced by the disposal facilities. Documentation of PCS transport and disposal will be reported to Maple on a weekly basis, maintained in the project file, and used to document transport and disposal of PCS for purposes of regulatory closure, if necessary.

4.4.1 Soil Sampling

Performance and confirmation monitoring during implementation of the Property redevelopment is described in following sections. Provisions for additional performance soil sampling also are provided in the event that Farallon requires additional data to minimize the quantity of soil being disposed of as PCS and/or to document compliance with the cleanup standards.

4.4.1.1 Location and Frequency of Sampling

The location and frequency of performance soil sampling will depend on field observations, results from field-screening, and the configuration of the excavation.

The location and frequency of soil sampling will be at the discretion of Farallon pending approval of the locations, methodology, and timing by Maple. If PCS is confirmed within an area, the area may be further divided into subareas, and additional soil samples collected to assess and define the lateral extent of PCS within the area and minimize the quantity of PCS requiring special handling and disposal.

4.4.1.2 Soil Sample Collection and Handling Procedures

Soil samples will be collected directly from the excavation sidewall or bottom if the excavation is less than 4 feet deep, or from the center of a track hoe bucket filled with soil that is representative of the sample area if the excavation is greater than 4 feet deep or if potentially hazardous conditions exist due to physical hazards or vapors. The soil samples will be collected using either stainless steel or plastic sampling tools. Non-dedicated sampling equipment will be decontaminated between uses as appropriate, with the exception of the track hoe bucket. Farallon will perform the following general procedures:

- Measure soil sample locations using a field-grade geographic positioning system or hand-measured coordinates relative to a landmark at the Property using a measuring tape or other measuring device and plot the soil sample location on a scaled Property plan. At the discretion of Farallon and pending approval of Maple, select sample locations will be surveyed by Maple, or subcontracted surveyors, relative to established horizontal and vertical datums. Digital photographs and/or video will be taken periodically to document excavation progress and to depict the final limits of the PCS excavation.
- Log information for each excavation and during each sampling event, including the following, at a minimum: soil sample depth or elevation, Unified Soil Classification System description, soil moisture, physical indications of potential hazardous substances, field-screening results, and sample identifiers.
- Immediately transfer the soil sample into laboratory-supplied sample containers. Soil samples to be analyzed for volatile organic compounds will be collected and prepared in accordance with U.S. Environmental Agency (EPA) Method 5035A field sampling protocols. Care will be taken not to handle the seal or the inside cap of the container when the sample is placed into the containers. The seals and caps will be secured.
- Label the soil sample container with the medium (i.e., soil), date, time sampled, unique sample identification and number, project name, project number, and sampler's initials.
- Log the soil sample on a Chain of Custody form, and place the sample into an ice- chilled cooler for transport to the laboratory under chain-of-custody protocols.
- Discard disposable sampling equipment and health and safety supplies in an appropriate waste receptacle at the Property.

Soil samples collected for waste disposal will be analyzed for hazardous substances by the following analytical methods:

- GRO by Northwest Method NWTPH-Gx;
- DRO and ORO by Northwest Method NWTPH-Dx; and
- PCE by EPA Method 8260D.

Any additional chemical analyses required for profiling by the waste disposal facility also will be performed using EPA- or state-approved analytical test methods and per the specifications of the waste disposal facility. The soil samples will be transported by courier or by an authorized representative to an Ecology-accredited laboratory. Analytical results will be obtained in both electronic and hard-copy format. The data will undergo a quality assurance/quality control review at the time of receipt, which will include review of laboratory quality control results and evaluation of analytical data for precision, accuracy, and completeness per standard Farallon procedures. The analytical results will be compiled into a database for data management. The soil samples will be analyzed on an appropriate turnaround schedule to minimize disruption to the construction schedule.

4.4.2 Erosion and Dust Control

Because exposed soil is susceptible to erosion by wind and water, erosion control measures should be planned carefully and should be in place before construction activities begin. At a minimum, erosion and dust control measures will be implemented in accordance with permits issued pursuant to applicable National Pollutant Discharge Elimination System, WAC 173-351, WAC 173-304, City of Redmond, and other local requirements.

4.4.3 Soil Removal

Soil excavated at the Property will be staged in separate temporary stockpiles in accordance with Section 4.4.4, Stockpiling, prior to evaluation for transportation off the Property for disposal.

4.4.4 Stockpiling

Impacted or potentially impacted soil that is placed in temporary stockpiles will be well maintained at all times. Stockpiled soil must be placed on impermeable plastic sheeting with a minimum thickness of 0.006 inches, with a berm at the perimeter of the stockpile to prevent runoff of stockpiled soil to surrounding areas. The plastic sheeting beneath the stockpile should be lapped over the berm materials, and the stockpile within the berm should be covered with plastic sheeting to prevent erosion. The upper plastic sheeting covering the soil stockpile should be secured using sandbags or equivalent. The upper plastic sheeting should prevent the stockpiled materials from being exposed to precipitation and wind.

4.5 WASTEWATER MANAGEMENT

If groundwater is encountered in excavation areas during construction activities, it will be considered wastewater. A temporary construction dewatering system will be used to pump the

wastewater into a holding tank pending laboratory analysis to confirm that permit-specified discharge limits are met prior to initiating discharge to the sanitary sewer system. If laboratory analytical results indicate that the wastewater is not impacted or impacted with concentrations less than the permitted discharge limits by Property hazardous substances, the wastewater will be disposed of by discharge to the sanitary sewer system in accordance with project permitting and local and state standards and regulations. Maple will be responsible for the permitting, reporting, and operation and maintenance of the temporary construction dewatering system.

Groundwater generated from temporary construction dewatering to facilitate excavation for the underground parking structure and building footings will be sampled and analyzed in accordance with the temporary discharge permit. At a minimum, wastewater will be treated to remove particulates prior to discharge. If wastewater post-treatment is found to contain hazardous substances at concentrations exceeding permitted discharge limits, the groundwater will be transferred to an on-site holding tank, treated in an on-site treatment system, and resampled prior to discharge.

Water samples collected for waste disposal will be analyzed for the analytes specified in the discharge permit, which at a minimum will likely include the hazardous substances by the following analytical methods:

- GRO by Northwest Method NWTPH-Dx;
- DRO and ORO by Northwest Method NWTPH-DX; and
- PCE by EPA Method 8260D.

Any additional chemical analyses required by the temporary discharge permit will be performed using EPA- or state-approved analytical test methods. The groundwater samples will be transported by courier or by an authorized representative to an Ecology-accredited laboratory. Analytical results will be obtained in both electronic and hard-copy format. The data will undergo a quality assurance/quality control review at the time of receipt, which will include review of laboratory quality control results and evaluation of analytical data for precision, accuracy, and completeness per standard Farallon procedures. The analytical results will be compiled into a database for data management. The waste profile water samples will be analyzed on an appropriate turnaround schedule to minimize disruption to the construction schedule.

4.6 CONTINGENCY PLAN FOR UNFORSEEN CONDITIONS

Unforeseen conditions may be encountered during excavation at a formerly developed property with a long history of use. Unforeseen conditions that may be encountered during excavation include discovery of underground storage tanks (USTs) or impacted media outside the area of PCS identified in Section 4.2.

In the event that a UST(s) is encountered during construction excavation, Maple will temporarily suspend excavation activities proximate to the UST and immediately notify Farallon or as soon as possible after the encounter. Each UST encountered will be permanently decommissioned by

excavation and removal in accordance with Washington State Underground Storage Tank Regulations (WAC 173-360) and the Ecology Guidance. A certified specialty subcontractor selected by Maple will provide a UST Decommissioner to conduct the UST decommissioning and removal activities, which will include inerting and rinsing the interior of the UST, as necessary, and removing the UST from the Property for recycling.

At the request of Maple, Farallon will support the permitting and inspection activities required for permanent decommissioning of USTs encountered during construction excavation as follows. Farallon will provide a Washington State-certified UST service contractor to observe the UST decommissioning activities, and conduct performance and/or confirmation soil sampling at the limits of soil excavation related to removal of the UST in accordance with Ecology regulations. Confirmation soil samples will be collected from the UST excavation and submitted for analysis for appropriate constituents based on field observations, the Ecology Guidance, and regulatory requirements. Farallon will complete and submit the Site Check/Site Assessment Checklist to Ecology following receipt of the confirmation soil sample analytical data.

If field observations indicate the presence of potentially impacted soil, groundwater, and/or stormwater related to USTs, or other potentially affected media during construction excavation, Maple will notify Farallon as soon as possible. In the event potentially impacted media are encountered, Maple will direct the Excavation Subcontractor to implement the following procedures:

- Stop excavation in the area of potential contamination;
- Isolate the area with barrier tape;
- Restrict vehicle and equipment traffic to avoid cross-contamination;
- Control personnel access; and
- Photograph and maintain notes documenting the encounter.

Following characterization of the potentially impacted media and development of an appropriate treatment and/or disposal alternative by Farallon and approved by Maple, Maple will direct the appropriate subcontractor(s) to implement the selected treatment and/or disposal remedy.

Farallon will observe unforeseen conditions and implement the following procedures:

- Estimate the boundaries of the potentially impacted media using field-screening methods;
- Further mark the area as necessary, possibly using white paint and/or wooden stakes;
- Photograph and maintain notes documenting the preliminary nature and extent of the potentially impacted media in-situ and/or stockpiled;
- Collect performance samples per applicable regulations and/or guidance to identify the nature and extent of potential contamination to identify and develop feasible alternatives

for the treatment and/or removal or disposal for purposes of disposal profiling, manifesting, and regulatory closure;

- Coordinate analytical testing and manage analytical data pertaining to the encountered impacted media, including expedited laboratory analysis as needed and in coordination with Maple, to minimize disruption to the construction schedule;
- Consult with Maple, and/or the Excavation Subcontractor, to develop and implement an impacted media removal and disposal plan, as needed;
- Collect confirmation samples per applicable regulations and guidance to confirm complete removal of impacted media; and

Complete treatment and/or disposal profiles and assist with identification of appropriate treatment and/or disposal facilities.

4.6.1 Impacted Soil Waste

Impacted soil temporarily stored on the Property will be tracked using a Waste Inventory form. A Resource Conservation and Recovery Act Subtitle D permitted facility will be selected based on hazardous substance concentrations in waste soil and as directed by Red Center Village #1 LLC or Maple. Waste profiles will be provided to the waste disposal facility for approval to transport and dispose of the waste soil. Disposal of waste soil off the Property will be scheduled as soon as practicable following receipt of analytical data and completion of the soil disposal profiling activities. Documentation of soil disposal will be maintained in the project file.

5.0 DOCUMENTATION REQUIREMENTS

Documentation will be necessary to report that excavation activities conducted at the Property meet Ecology Guidance requirements. The document control system to be implemented to manage data during the excavation activities includes the following elements as appropriate: Field Report forms, Property maps, field-screening documentation, sampling event documentation, Chain of Custody forms, laboratory analytical reports, digital photographs and/or video, Waste Inventory forms, and waste management labels. Transport and disposal manifests for PCS disposed of off the Property will be maintained in project files.

5.1 FIELD DOCUMENTATION

Farallon field personnel will be required to keep a daily field log on a Field Report form. Copies of Field Report forms from prior work days will be maintained in a project binder in the project field office, and will be available for review by Maple. Field notes will be as descriptive and inclusive as possible, allowing independent parties to reconstruct the implementation of sampling activities from the recorded information. Language will be objective, factual, and free of inappropriate terminology. At a minimum, field documentation will include the date, job number, project identification and location, weather conditions, sample collection data, field equipment used, and notation of any activity performed in a manner other than as specified in this EMMP. If other forms are completed or used (e.g., Chain of Custody form, maps), they will be referred to in and attached to the Field Report form.

Supplementary documentation forms will be used to augment the Field Report form. These forms will include Soil Sampling forms, Waste Inventory forms, and other sampling event data documentation that may be developed to facilitate documentation of the excavation activities.

Sample labels will be filled out and affixed to appropriate containers during sample collection. Soil samples collected during the excavation activities will be identified, labeled, and documented in the field at the time of collection.

Soil samples collected from the excavation will be assigned a unique sample identifier that will include the components listed below:

- Description of the sample location;
- Approximate elevation of the surface soil sample in feet referenced to the North American Vertical Datum of 1988; and
- Sampling date (e.g., MMDDYY).

For example, the soil sample collected from the northwestern portion of the excavation at an elevation of 245 feet NAVD88 on October 2, 2021 would be assigned the sample identifier [grid square]-NW-245-100221.

The soil sample identifier will be filled out in indelible ink on sample labels affixed to appropriate containers immediately prior to sample collection. Each sample container label will also include the following: the project number, the project name, the unique sample identification number, preservatives (if applicable), required analyses, sampler's initials, and the date and time at which the sample was collected.

A Chain of Custody form will be completed by Farallon at the time of sample collection. All samples submitted to the laboratory will be accompanied by the Chain of Custody form. Formal chain-of-custody protocols are designed to create an accurate written record that can be used to trace the possession and handling of the sample from the moment of its collection through analysis and reporting of analytical values. These protocols will be followed whenever samples are collected, transferred, stored, analyzed, or destroyed.

The Chain of Custody form will include the following information: the Property name, sample identification number (assigned by the sampler in the field), sample date, sample location, and type of analysis required (if any). Whenever a sample is transferred from one party to another, both parties will sign the Chain of Custody form, and record the date and time of the transfer. In this manner, sample integrity is ensured from collection through analysis.

At the laboratory, each sample will be assigned a unique sequential laboratory identification number that is stamped or written on the Chain of Custody form. Samples will be held by the laboratory under internal custody in the Sample Control room under appropriate storage conditions (i.e., ambient, refrigeration, frozen). The laboratory Project Manager is responsible for tracking the status of the samples throughout the laboratory. Samples will be signed out of the laboratory sample control room using a sample control logbook, which will be filled out by the analyst who will prepare the samples for analysis.

5.2 HEALTH AND SAFETY PLAN

A Health and Safety Plan is required for field activities pertaining to the Property redevelopment (WAC 173-340-820). Each party involved in the implementation of the Property redevelopment, including Maple and subcontractors, will be responsible for the preparation and implementation of their own Health and Safety Plan that meets or exceeds project-specific health and safety requirements enforced by Maple. Health and Safety Plans will comply with the requirements of the Occupational Safety and Health Act of 1970 (29 CFR 1910), and the Washington Industrial Safety and Health Act (RCW 49.17). Farallon's Health and Safety Plan will be available for review at all times during implementation of the property redevelopment and will include provisions for periodic briefings and limitations with regards to use of the Farallon Health and Safety Plan by others.

6.0 REFERENCES

Arcadis U.S., Inc. 2020. *Monitoring Well Installation and Data Gap Investigation Work Plan, Chevron Service Station 9-8795, 16010 Redmond Way, Redmond, Washington.* March 11.

Environmental Data Resources, Inc. (EDR). 2015. *The EDR Radius Map Report with GeoCheck, 8005 161st Avenue Northeast, Redmond, WA 98052*. April 15.

Environmental Risk Information Services (ERIS). 2020. *Database Report, Redmond Commercial Properties, 8010 160th Avenue Northeast and 16002 Redmond Way Northeast, Redmond , WA 98052.* October 20.

Farallon Consulting, L.L.C. 2015a. *Phase I Environmental Site Assessment Report, 8005 161st Avenue Northeast, Redmond, Washington.* Prepared for Central Valley Annex LLC. May 18.

_____. 2015b. *Subsurface Investigation Report, 8005 161st Avenue Northeast, Redmond, Washington*. Prepared for Central Valley Annex LLC. July 1.

Ground Support, PLLC. 2021. *Temporary Shoring Wall Plans, NLG Project One, 8005/8075 161ST Avenue NE, Redmond, Washington.* March 30.

Middour Consulting, LLC. 2021. *Groundwater Control Plan, Nelson Legacy Group Project One, Redmond, Washington.* May 3.

Washington State Department of Ecology (Ecology). 2010. *Guidance for Remediation of Petroleum Contaminated Sites*. Publication No. 10-09-057. Revised June 2016. November.

_____. 2021. Letter Regarding Nelson Legacy Group (NLG) Project One, File# SEPA-2020-00898, Ecology SEPA#. From Katelynn Piazza. To Benjamin Sticka, City of Redmond. June 11.

7.0 LIMITATIONS

7.1 GENERAL LIMITATIONS

The conclusions contained in this report/assessment are based on professional opinions with regard to the subject matter. These opinions have been arrived at in accordance with currently accepted hydrogeologic and engineering standards and practices applicable to this location. The conclusions contained herein are subject to the following inherent limitations:

- **Accuracy of Information**. Farallon obtained, reviewed, and evaluated certain information used in this report/assessment from sources that were believed to be reliable. Farallon's conclusions, opinions, and recommendations are based in part on such information. Farallon's services did not include verification of its accuracy or authenticity. Should the information upon which Farallon relied prove to be inaccurate or unreliable, Farallon reserves the right to amend or revise its conclusions, opinions, and/or recommendations.
- **Reconnaissance and/or Characterization**. Farallon performed a reconnaissance and/or characterization of the Property that is the subject of this report/assessment to document current conditions. Farallon focused on areas deemed more likely to exhibit hazardous materials conditions. Contamination may exist in other areas of the Property that were not investigated or were inaccessible. Property activities beyond Farallon's control could change at any time after the completion of this report/assessment.

For the foregoing reasons, Farallon cannot and does not warrant or guarantee that the Property is free of hazardous or potentially hazardous substances or conditions, or that latent or undiscovered conditions will not become evident in the future. Farallon's observations, findings, and opinions can be considered valid only as of the date of the report.

This report/assessment has been prepared in accordance with the contract for services between Farallon and Red Center Village #1 LLC, and currently accepted industry standards. No other warranties, representations, or certifications are made.

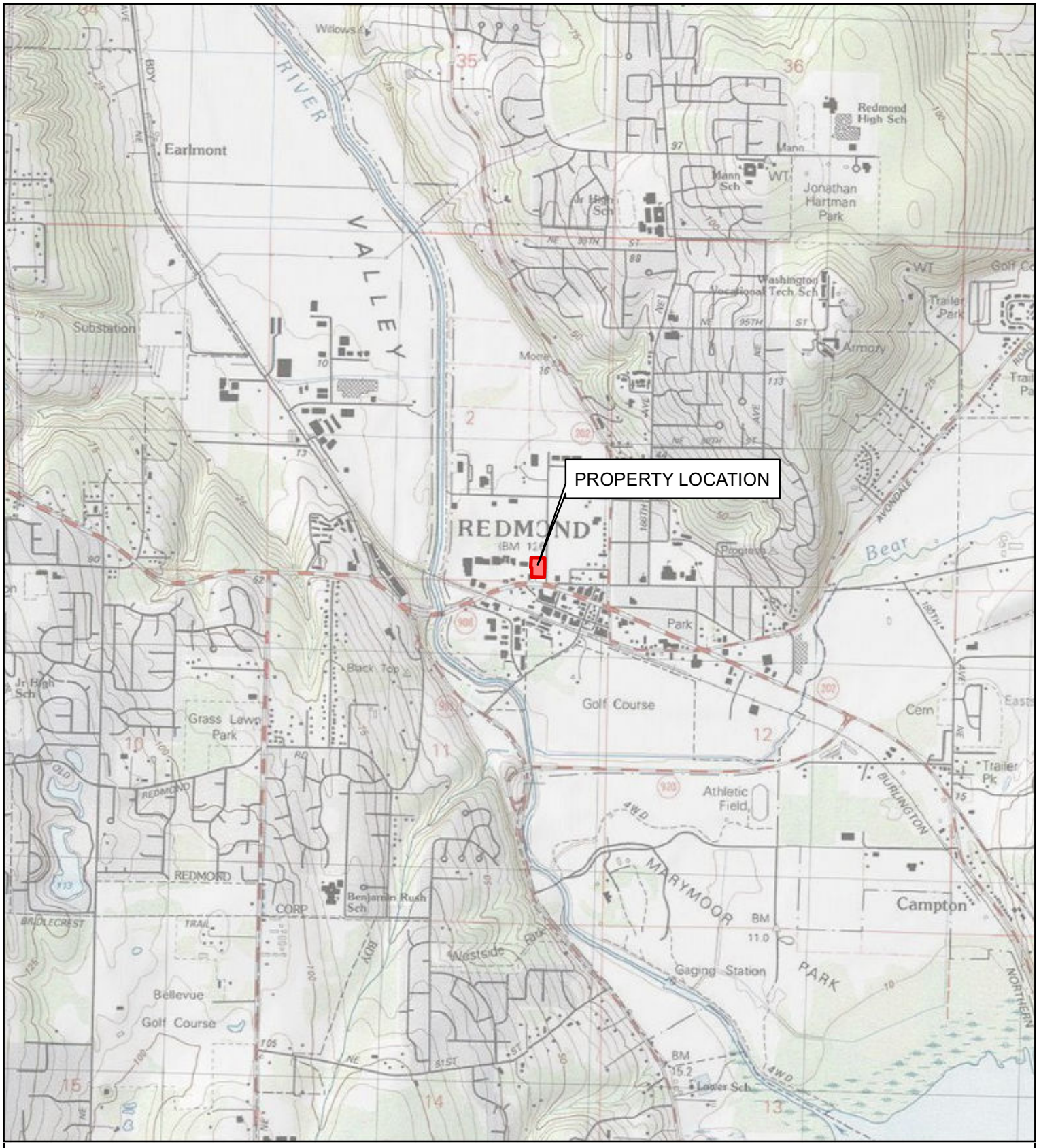
7.2 LIMITATION ON RELIANCE BY THIRD PARTIES

Reliance by third parties is prohibited. This report/assessment has been prepared for the exclusive use of Red Center Village #1 LLC to address the unique needs of Red Center Village #1 LLC at the Property at a specific point in time.

This is not a general grant of reliance. No one other than Red Center Village #1 LLC may rely on this report unless Farallon agrees in advance to such reliance in writing. Any unauthorized use, interpretation, or reliance on this report/assessment is at the sole risk of that party and Farallon will have no liability for such unauthorized use, interpretation, or reliance.

FIGURES

ENVIRONMENTAL MEDIA MANAGEMENT PLAN
NLG PROJECT 1 PROPERTY
8005 AND 8075 161ST AVE NE
REDMOND, WASHINGTON
Farallon PN: 650-026



REFERENCE: 7.5 MINUTE USGS QUADRANGLE KIRKLAND, WASHINGTON, DATED 2013

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Oregon
Portland | Baker City

California
Oakland | Irvine

FIGURE 1

PROPERTY VICINITY MAP
8005 AND 8075 161st AVENUE NORTHEAST
REDMOND, WASHINGTON

FARALLON PN: 650-026

Drawn By: TPerrin | Checked By: AM | Date: 7/20/2021 | Disc Reference:

Path: Q:\Projects\650 Nelson Properties\650026 Aquaquip Site\Mapfiles\026 161st Avenue Property\Figure-01_SiteVicinity.mxd

LEGEND

- BORING
- SUBSLAB SOIL GAS SAMPLE
- PROPERTY BOUNDARY
- KING COUNTY PARCEL BOUNDARY

NOTES:
1. ALL LOCATIONS ARE APPROXIMATE.
2. FIGURES WERE PRODUCED IN COLOR. GRAYSCALE COPIES MAY NOT REPRODUCE ALL ORIGINAL INFORMATION.

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Portland | Baker City

California
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FIGURE 2

PROPERTY PLAN SHOWING
SAMPLING LOCATIONS
8005 AND 8075 161st AVENUE NORTHEAST
REDMOND, WASHINGTON

FARALLON PN: 650-026

Drawn By: TPerrin | Checked By: AM | Date: 7/20/2021 | Disc Reference:

Path: Q:\Projects\650 Nelson Properties\650026 Aquaquip Site\Mapfiles\026_161st Avenue Property\Figure-02_SitePlan.mxd

TABLES

ENVIRONMENTAL MEDIA MANAGEMENT PLAN
NLG PROJECT 1 PROPERTY
8005 AND 8075 161ST AVE NE
REDMOND, WASHINGTON
Farallon PN: 650-026

Table 1
Soil Analytical Results
NLG Project 1
8005 and 8075 161st Avenue Northeast
Redmond, Washington
Farallon PN: 650-026

Sample Location	Sample Identification	Sample Date	Sample Depth (feet)[1]	Analytical Results (milligrams per kilogram)											
				DRO[2]	ORO[2]	GRO[3]	Benzene[4]	Toluene[4]	Ethyl-benzene[4]	Total Xylenes[4]	PCE[5]	TCE[5]	cis-1,2-DCE[5]	trans-1,2-DCE[5]	Vinyl Chloride[5]
FB-1	FB1-16.0-051115	5/11/2015	16.0	<27	<54	<6.0	<0.20	<0.060	<0.060	<0.060	<0.0011	<0.0011	<0.0011	<0.0011	<0.0011
FB-2	FB2-12.5-051115	5/11/2015	12.5	<27	130	17 Z	<0.20	<0.059	<0.059	<0.059	<0.0010	<0.0010	<0.0010	<0.0010	<0.0010
MTCA Method A Cleanup Levels for Soil[6]				**2,000**	**2,000**	**100**	**0.03**	**7**	**6**	**9**	**0.05**	**0.03**	**160[7]**	**1,600[7]**	**0.67[7]**

NOTES:

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

[1]Depth in feet below ground surface.

[2]Analyzed by Northwest Method NWTPH-Dx.

[3]Analyzed by Northwest Method NWTPH-Gx.

[4]Analyzed by U.S. Environmental Protection Agency (EPA) Method 8021B.

[5]Analyzed by EPA Method 8260C.

[6]Washington State Model Toxics Control Act Cleanup Regulation (MTCA) Method A Soil Cleanup Levels for Unrestricted Land Uses, Table 740-1 of Section 900 of Chapter 173-340 of the Washington Administrative Code, as revised 2013.

[7]Washington State Department of Ecology Cleanup Levels and Risk Calculations under the Washington State Model Toxics Control Act Cleanup Regulation, Version 3.1 Standard Method B Formula for Soil (Unrestricted Land Use) - Direct Contact (Ingestion Only) and Leaching Pathway Values. https://fortress.wa.gov/ecy/clarc/CLARCHome.aspx

BTEX = benzene, toluene, ethylbenzene, and xylenes

DCE = dichloroethene

DRO = total petroleum hydrocarbons (TPH) as diesel-range organics

GRO = TPH as gasoline-range organics

ORO = TPH as oil-range organics

PCE = tetrachloroethene

TCE = trichloroethene

Z = The sample chromatogram is similar to turpentine.

Table 2
Groundwater Analytical Results
NLG Project 1
8005 and 8075 161st Avenue Northeast
Redmond, Washington
Farallon PN: 650-026

Sample Location	Sample Identification	Sample Date	Analytical Results (micrograms per liter)											
			DRO[1]	ORO[1]	GRO[2]	Benzene[3]	Toluene[3]	Ethyl-benzene[3]	Total Xylenes[3]	PCE[4]	TCE[4]	cis-1,2-DCE[4]	trans-1,2-DCE[4]	Vinyl Chloride[4]
FB-1	FB1-16.0-051115	5/11/2015	<260	<410	<100	<1.0	<1.0	<1.0	<1.0	0.34	<0.20	<0.20	<0.20	<0.20
FB-2	FB2-12.5-051115	5/11/2015	<260	<410	<100	<1.0	<1.0	<1.0	<1.0	0.38	<0.20	<0.20	<0.20	<0.20
MTCA Method A Cleanup Levels for Soil[5]			**500**	**500**	**1,000**	**5**	**1,000**	**700**	**1,000**	**5**	**5**	**16[6]**	**160[6]**	**0.2[6]**

NOTES:

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

[1]Analyzed by Northwest Method NWTPH-Dx.

[2]Analyzed by Northwest Method NWTPH-Gx.

[3]Analyzed by U.S. Environmental Protection Agency (EPA) Method 8021B.

[4]Analyzed by EPA Method 8260C.

[5]Washington State Model Toxics Control Act Cleanup Regulation (MTCA) Method A Groundwater Cleanup Levels for Unrestricted Land Uses, Table 740-1 of Section 900 of Chapter 173-340 of the Washington Administrative Code, as revised 2013.

[6]Washington State Department of Ecology Cleanup Levels and Risk Calculations under the Washington State Model Toxics Control Act Cleanup Regulation, Version 3.1 Standard Method B Formula for Groundwater (Unrestricted Land Use).
https://fortress.wa.gov/ecy/clarc/CLARCHome.aspx

BTEX = benzene, toluene, ethylbenzene, and xylenes

DCE = dichloroethene

DRO = total petroleum hydrocarbons (TPH) as diesel-range organics

GRO = TPH as gasoline-range organics

PCE = tetrachloroethene

ORO = TPH as oil-range organics

TCE = trichloroethene

Table 3
Subslab Soil Gas Sample Analytical Results
NLG Project 1
8005 and 8075161st Avenue Northeast
Redmond, Washington
Farallon PN: 650-026

Sample Location	Sample Identification	Sample Date	Analytical Results (micrograms per cubic meter)[1]							
			Benzene	Toluene	Ethylbenzene	Xylenes	PCE	TCE	trans-1,2-DCE	Vinyl Chloride
SS	SS-051115	5/11/2015	<4.2	11	<5.8	8.7	22	<7.1	<5.2	<3.4
MTCA Method B Screening Levels for Soil Gas (Residential)[2]			**10.7**	**7,620**	**1,520**	**1,520[3]**	**321**	**12.3**	**NE**	**9.33**

NOTES:

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

[1]Analyzed by U.S. Environmental Protection Agency Method TO-15.

[2] Washington State Model Toxics Control Act Cleanup Regulation (MTCA) Method B Soil Gas Residential Screening Levels for Indoor Air.

[3] MTCA Method B Soil Gas Screening Level for Indoor Air established for m-xylene. Cleanup level for p-xylene not established by MTCA.

DCE = dichloroethene

NE = not established

PCE = tetrachloroethene

TCE = trichloroethene