



ENVITECHNOLOGY

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9805 NE 116th St, Suite 300, Kirkland, WA 98034

Limited Phase II Environmental Site Assessment

101 Outpost Station

***822 East Washington Street
Sequim, WA 98382***

Prepared for

Mountain Pacific Bank
3732 Broadway
Everett, WA 98201

Prepared by

Envitechnology, Inc.
9805 NE 116th Street, Suite 300
Kirkland, WA 98034

September 15, 2020

Project No. 02200729-1



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RELIANCE LETTER

September 15, 2020

To: Mountain Pacific Bank ("Lender")
3732 Broadway, Everett, WA 98201

And

U.S. Small Business Administration ("SBA")

Re: Borrower Name: Kamboj, LLC.
Project Address ("Property"): 822 East Washington Street, Sequim, WA 98382
Environmental Investigation Report Number(s): 02200729-1

Dear Lender and SBA:

Dr. Jake S. Lee ("Environmental Professional") meets the definition of an Environmental Professional as defined by 40 C.F.R. & 312.10 (b) and has performed the following "Environmental Investigation(s)" (check all that apply):

☐ A Transaction Screen of the Property dated _____, 20__, and any addendum(s) thereto, conducted in accordance with ASTM International's most recent standard (currently ASTM E1528-14);

☐ A Phase I (or an Updated Phase I) Environmental Site Assessment of the Property dated _____, 20__, and any addendum(s) thereto, conducted in accordance with ASTM International's most recent standard (currently ASTM E1527-13). In addition, the Environmental Professional has addressed the performance of the "additional inquiries" set forth at 40 C.F.R. § 312.22;

☒ A Phase II Environmental Site Assessment of the Property dated September 15, 2020, and any addendum(s) thereto, conducted in accordance with generally-accepted industry standards of practice and consisting of a scope of work that would be considered reasonable and sufficient to identify the presence, nature and extent of a Release as it impacts the Property.

Reliance by SBA and Lender. Environmental Professional (and Environmental Professional's firm, where applicable) understand(s) that the Property may serve as collateral for an SBA guaranteed loan, a condition for which is an Environmental Investigation of the Property by an Environmental Professional. Environmental Professional (and Environmental Professional's firm, where applicable) authorize(s) Lender and SBA to use and rely upon the Environmental Investigation. Further, Environmental Professional (and Environmental Professional's firm, where applicable)



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authorize(s) Lender and SBA to release a copy of the Environmental Investigation to the borrower for information purposes only. This letter is not an update or modification to the Environmental Investigation. Environmental Professional (and Environmental Professional's firm, where applicable) makes no representation or warranty, express or implied, that the condition of the property on the date of this letter is the same or similar to the condition of the property described in the Environmental Investigation.

Insurance Coverage. Environmental Professional (and Environmental Professional's firm, where applicable) certifies that he or she or the firm is covered by errors and omissions liability insurance with a minimum coverage of \$1,000,000 per claim (or occurrence), and that evidence of this insurance is attached. As to the Lender and SBA, Environmental Professional (and Environmental Professional's firm, where applicable) specifically waive(s) any dollar amount limitations on liability up to \$1,000,000 as well as any time limitations on liability, other than state or Federal statutes of limitation.

Waiver of Right to Indemnification. Environmental Professional and Environmental Professional's firm waive any right to indemnification from the Lender and SBA.

Impartiality. Environmental Professional certifies that (1) to the best of his or her knowledge, Environmental Professional is independent of and not a representative, nor an employee or affiliate of seller, borrower, operating company, or any person in which seller has an ownership interest; and (2) the Environmental Professional has not been unduly influenced by any person with regard to the preparation of the Environmental Investigation or the contents thereof.

Acknowledgment. The undersigned acknowledge(s) and agree(s) that intentionally falsifying or concealing any material fact with regard to the subject matter of this letter or the Environmental Investigations may, in addition to other penalties, result in prosecution under applicable laws including 18 U.S.C. § 1001.

Environmental Professional

Printed Name: Jake S. Lee, Ph.D.

Signature of representative of firm who is authorized to sign this letter

Printed Name & Title: Jake S. Lee, Ph.D., Principal

Name of Environmental Firm: Envitechnology, Inc.

Enclosure: Evidence of Insurance



CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY)

02/23/2020

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must have ADDITIONAL INSURED provisions or be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

PRODUCER Hiscox Inc. 520 Madison Avenue 32nd Floor New York, NY 10022	CONTACT NAME:	FAX (A/C, No):
	PHONE (A/C, No, Ext): (888) 202-3007	
INSURED Envitechnology, Inc. 9805 NE 116th St Ste 300 Kirkland WA 98034	E-MAIL ADDRESS: contact@hiscox.com	
	INSURER(S) AFFORDING COVERAGE	
	INSURER A: Hiscox Insurance Company Inc	NAIC # 10200
	INSURER B:	
	INSURER C:	
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COVERAGES**CERTIFICATE NUMBER:****REVISION NUMBER:**

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	ADDL INSD	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS
	COMMERCIAL GENERAL LIABILITY						EACH OCCURRENCE \$
	☐ CLAIMS-MADE ☐ OCCUR						DAMAGE TO RENTED PREMISES (Ea occurrence) \$
							MED EXP (Any one person) \$
							PERSONAL & ADV INJURY \$
	GEN'L AGGREGATE LIMIT APPLIES PER:						GENERAL AGGREGATE \$
	☐ POLICY ☐ PRO-JECT ☐ LOC						PRODUCTS - COMP/OP AGG \$
	OTHER:						\$
	AUTOMOBILE LIABILITY						COMBINED SINGLE LIMIT (Ea accident) \$
	☐ ANY AUTO						BODILY INJURY (Per person) \$
	☐ OWNED AUTOS ONLY ☐ SCHEDULED AUTOS						BODILY INJURY (Per accident) \$
	☐ HIRED AUTOS ONLY ☐ NON-OWNED AUTOS ONLY						PROPERTY DAMAGE (Per accident) \$
							\$
	UMBRELLA LIAB						EACH OCCURRENCE \$
	☐ EXCESS LIAB ☐ CLAIMS-MADE						AGGREGATE \$
	DED ☐ RETENTION \$						\$
	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY						☐ PER STATUTE ☐ OTH-ER
	ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH) ☐ Y / N ☐ N / A						E.L. EACH ACCIDENT \$
	If yes, describe under DESCRIPTION OF OPERATIONS below						E.L. DISEASE - EA EMPLOYEE \$
							E.L. DISEASE - POLICY LIMIT \$
A	Professional Liability			UDC-2200948-EO-20	04/08/2020	04/08/2021	Each Claim: \$ 1,000,000 Aggregate: \$ 1,000,000

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)

CERTIFICATE HOLDER**CANCELLATION**

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.

AUTHORIZED REPRESENTATIVE

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September 15, 2020

Project number 02200729-1

Laurie Carpenter
Mountain Pacific Bank
3732 Broadway
Everett, WA 98201

Subject: Limited Phase II Environmental Site Assessment
101 Outpost Station
822 East Washington Street, Sequim, WA 98382

Envitechnology, Inc. is pleased to submit two copies of our report describing the finding of the Subsurface Investigation performed at the above property.

The purpose of this assessment is to evaluate the Recognized Environmental Conditions (RECs) for the purpose of providing sufficient information regarding the nature and extent of contamination to assist in making informed business decisions about the property; and where applicable, providing the level of knowledge necessary to satisfy the innocent purchaser defense under CERCLA.

This assessment was prepared in general accordance with the American Society of Testing and Materials (ASTM) Standard Practices for Environmental Site Assessments: Phase II ESA Process (ASTM Designation: E1903).

If you have any questions or require further clarification of the report findings, please contact the undersigned at your convenience. Thank you for the opportunity to be of service to you.

Yours very truly,

A handwritten signature in black ink that reads "Jake S. Lee".

Jake S. Lee, Ph.D.
President
Envitechnology
ICC Certified Washington State Site Assessor (5264460-U7)
ICC Certified UST Decommissioning (5264460-U2)
ICC Certified UST Installation/Retrofitting (5264460-U5)



Seung K. Chung, P.E.
Senior Environmental Consultant
Envitechnology



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1. EXECUTIVE SUMMARY

The Subject Property is a fueling service station located on the north side of East Washington Street and one block east of the intersection at South Brown Road and East Washington Street. The Subject Property consists of a parcel of commercial land (parcel number 03-30-20-42-9010) with a reported total area of an approximately 0.69 acres. The parcel of land is improved by an approximately 1,558 square feet, one story, wood framed building used for a convenience store known as 101 Outpost Station.

Envitechtechnology has recently completed a Phase I ESA study on the Subject Property. The following recognized environmental conditions (RECs) were identified during the recent phase I ESA study on the Subject Property. *The fueling service station has been present at the Subject Property for 43 years. Based on the age of the current UST system (26 years), lack of recent analytical soil and/or groundwater data, and the possibility that releases may occur from tanks or tank system that are otherwise testing as tight, there is a potential risk that a release from the USTs that affected the subsurface of the Subject Property. As such, the presence of current USTs at the Subject Property represents a recognized environmental condition (REC).*

A total of six (6) soil borings were advanced into native soils on September 1, 2020. Three (3) borings (B1 through B3) were advanced in the vicinity of the UST pad. Two (2) borings (B4 and B5) were advanced in the vicinity of the fueling dispensers. One (1) boring (B6) was advanced in the vicinity of former UST pit. Each of soil borings were advanced to 15 feet bgs, with the exception of boring B1, which was met with refusal at 14 feet bgs. Total six (6) soil samples were collected, one sample per each borehole.

The surface cover at the Site consists of asphalt. Native soils beneath fill or other surface cover materials include a layer of dark brown, dry, silty GRAVEL to a depth of 5 feet bgs, underlain by a layer of light brown to grayish brown, dry, silty GRAVEL with varying amount of sand to a depth of 13 feet bgs, and underlain by a layer of gray, moist, poorly graded SAND to a depth of boring refusal at 14 – 15 ft bgs. Groundwater was not observed during soil exploration to a depth of 15 feet bgs.

A zone of gray-stained sand exhibiting a slight to moderate petroleum odor was observed at depths ranging from 13 to 15 feet bgs in the borehole B2. VOCs were also detected in the soil sample B2-15, when screened with a MiniRae 3000 Photoionization Detector (PID). The ground penetrating radar (GPR) survey did not reveal the presence of any anomaly indicative of former USTs at the Site. However, the survey identified buried electric lines, underground utilities, former UST excavation pit and other buried objectives at the Site.



Laboratory analysis of the soil samples for GRO, DRO, ORO and BTEX indicated that elevated concentrations of BTEX and GRO were identified in the soil sample B2-15. Benzene, xylene and GRO were identified at concentrations of 0.032, 18, and 190 mg/kg, respectively, exceeding their MTCA Method A cleanup levels (0.03, 9, and 30 mg/kg for benzene, xylene, and GRO). GRO also identified in B3-15 and B4-10 at concentrations below the MTCA Method A cleanup levels. ORO was identified in B6-15 at concentration below the MTCA Method A cleanup level. Other petroleum contaminants were all below the laboratory detection limits.

Based on the result of this assessment, benzene, xylene and GRO exceeding their MTCA Method A cleanup levels were identified in the soil sample (B2-15) at the Subject Property.

Envitechnology recommends additional subsurface investigation in order to verify the lateral and vertical extent and magnitude of contamination. To achieve lawful compliance with Chapter 173-340-300 (site discovery and reporting), Envitechnology recommends that copies of this report along with any future reports regarding the environmental conditions thus far encountered be forwarded to the Washington State Department of Ecology.



2. INTRODUCTION

Mountain Pacific Bank engaged Envitechnology to conduct a Phase II Environmental Site Assessment (ESA) on the property, 101 Outpost Station, located at 822 East Washington Street, Sequim, WA 98382, subsequently referred to in this report as “the Subject Property”.

The purpose of the Phase II ESA was to collect and evaluate environmental data at the Site to determine potential impacts to human health and the environment resulting from on-site exposure and/or off-site migration of site contaminants.

This assessment was prepared in general accordance with the American Society of Testing and Materials (ASTM) Standard Practices for Environmental Site Assessments: Phase II ESA Process (ASTM Designation: E1903).

2.1. SCOPE OF SERVICES

The scope of work for this assessment was in general accordance with the American Society of Testing and Materials (ASTM) Standard Practices for Environmental Site Assessments: Phase II ESA Process (ASTM Designation: E1903, 2011 and 2019). The methodologies are described as representing good commercial and customary practice for conducting a Phase II ESA of a property for the purpose of evaluating Recognized Environmental Conditions.

The scope of work included the following tasks:

- Review of Existing Information
- Geophysical survey
- Field Exploration
- Sampling and Chemical Analyses
- Evaluation of Results
- Discussion of Finding and Conclusions

2.2. LIMITATIONS AND EXCEPTIONS OF ASSESSMENTS

This assessment was prepared in general accordance with the American Society of Testing and Materials (ASTM) Standard Practices for Environmental Site Assessments: Phase II ESA Process (ASTM Designation: E1903, 2011 and 2019), and contains all of the limitations inherent in these methodologies. No other warranties, expressed or implied, are made as



to the professional services provided under the terms of our contract and included in this report.

No ESA can eliminate all uncertainty. Furthermore, any sample, either surface or subsurface, taken for chemical analysis may or may not be representative of a larger population. Professional judgment and interpretation are inherent in the process and uncertainty is inevitable. Additional assessment may be able to reduce the uncertainty.

Even when Phase II ESA work is executed with an appropriate site-specific standard of care, certain conditions present especially difficult detection problems. Such conditions may include, but are not limited to, complex geological settings, the fate and transport characteristics of certain hazardous substances, the distribution of existing contamination, physical limitations imposed by the location of utilities and other man-made objects, and the limitations of assessment technologies.

Phase II ESA does not generally require an exhaustive assessment of environmental conditions on a property. There is a point at which the cost of information obtained and the time required to obtain it outweigh the usefulness of the information and, in fact, may be a material detriment to the orderly completion of transactions. If hazardous substance releases are confirmed on a parcel of property, the extent of further assessment is related to the degree of uncertainty that is acceptable to the user with respect to the real estate transaction.

Measurements and sampling data only represent the site conditions at the time of data collection. Therefore, the usability of data collected as part of this Phase II ESA may have a finite lifetime depending on the application and use being made of the data. An environmental professional should evaluate whether the generated data are appropriate.



3. BACKGROUND

3.1. SITE DESCRIPTION AND FEATURES

The Subject Property is a fueling service station located on the north side of East Washington Street and one block east of the intersection at South Brown Road and East Washington Street. The site is bordered on the south by East Washington Street. The surrounding area is a commercial setting.

The Subject Property consists of a parcel of commercial land (parcel number 03-30-20-42-9010) with a reported total area of an approximately 0.69 acres. The parcel of land is improved by an approximately 1,558 square feet, one story, wood framed building used for a convenience store known as 101 Outpost Station.

The building is located in the center of the Site. It is occupied by a convenience store. The interior of the convenience store is configured with a cash register counter directly inside facing the entrance door to the south. The center of the building is a retail display area, with a walk-in cooler along the northern wall. The tank monitoring system is Incon TS-550 model.

A metal canopy with five (5) dispensers is located in front of the convenience store. On the east side of the convenience store, underneath a concrete pad is underground storage tanks (USTs). The UST system consists of four (4) tanks – one (1) 10,000-gallon regular-grade gasoline tank, one (1) 10,000-gallon premium-grade gasoline tank, one (1) 10,000-gallon mid-grade gasoline tank, and one (1) 10,000-gallon diesel tank. The tanks are single walled, dielectric coated steel tanks. The tanks are protected from corrosion by sacrificial anode cathodic protection. Products are connected with double walled, fiberglass piping. The current UST system was reportedly installed on 9/15/1994. The previous generation of UST system appeared to have been removed.

The balance of the Subject Property consists of customer parking around the building. Access of the Subject Property is achieved from East Washington Street.

The legal description of the Subject Property is:

Parcel # 03-30-20-42-9010

LOT 2 HALLERS SP V3 P27 LINE SUR V59 P4

3.2. ADJOINING PROPERTIES



An adjoining property is any real estate property whose border is contiguous or partially contiguous with the Subject Property, or that would be if the properties were not separated by a roadway, street, public thoroughfare, river or stream. The following identifies specific adjacent property tenants and/or use:

Direction	Site Use	Adjoining Street
East	Commercial – Windermere Ral Estate	Non-applicable
West	Parking lot for Les Schwab Tire Center	Non-applicable
South	Parking lot for Econo Lodge	E Washington ST.
North	Les Schwab Tire Center	Non-applicable

3.3. PHYSICAL SETTING

The objective of reviewing physical setting is to provide information about the impact of potential environmental contaminant migration.

Current USGS 7.5 Minute Topographic Maps (Sequim, WA, 1985) was reviewed to determine the topography of the Subject Property. The Quad Map shows no physical features that may have environmentally impacted the Subject Property.

The surface elevation at the site is approximately 147 feet above mean sea level. The parcel is fairly level. Information on groundwater flow and soil type was obtained to determine the ease with which contaminants from surrounding properties can reach the Subject Property. Based upon the USGS map and surface topography, groundwater is inferred to flow generally to the north and east. However, topography is not always a reliable basis for predicting the groundwater flow direction. Local gradient under the Subject Property may be influenced by naturally by zones of higher or lower permeability, or artificially by nearby pumping or recharge, and may deviate in any particular location for the overall regional trend. Significant body of water includes Sequim Bay 3.0-mile to the southeast. The nearest surface water is Bell Creek which runs adjacent to the west of the Subject Property. This stream may be intermittent.

According to the USDA Soil Conservation, the dominant soil type of this area is *Sequim very gravelly sandy loam*. This type of soil is somewhat excessively drained. Available water capacity is very low at about 1.7 inches. Typical soil profile is a layer of very gravelly sandy loam to a depth of 10 inches, underlain by a layer of extremely cobbly loamy sand to a depth of 23 inches, and underlain by a layer of extremely cobbly sand to a depth of 60 inches.



The Subject Property is located within the Olympic Mountain physiographic province of Washington State, which consists of submarine and sub-aerial basal flow with interbedded siltstone and limestone materials. The Site is further located over a tertiary-aged formation.

The review of the groundwater well data indicated that the depth to water is estimated to be less than 15 feet below the surface of the soil. Water generally flows toward the northeast from the Subject Property.

According to the previous *Site Assessment and Interim Cleanup Report for the 101 Outpost Mini-Mart Sequim, Washington (1995)*, the entire excavation consisted of glacial till with rocks varying in size between a quarter of an inch and 4 inches in diameter and a United Soil Classification of GC, except for the southern half of the bottom of the excavation which still contained the bedding sand for the removed USTs.

3.4. SITE HISTORY AND LAND USE

The Site was an undeveloped land (1954 - 1977) until the current use as a retail convenience store and fueling service station approximately in 1977. The original five USTs installed in 1977 were replaced with four USTs and associated piping in 1994. A release was reported during tanks removal. The Subject Property has been used as a fueling service station since its construction in 1977 until present. The following HREC was identified at the Subject Property – Historical LUST. An NFA was issued on 8/31/2012.

3.5. PREVIOUS ENVIRONMENTAL INVESTIGATIONS

UST Decommissioning in 1994

Previous generation of USTs were five (5) USTs – two (2) 6,000-gallon gasoline tanks, two (2) 8,000-gallon gasoline tanks, and one (1) 6,000-gallon diesel tank. These tanks were located along the west edge of the property. The five tanks and associated five dispensers were installed on 11/1/1977.

These previous tanks were decommissioned in 1994. According to the interim cleanup report, twenty-five (25) soil samples were tested. The analytical results indicated that all the samples were below the level of concern, except for two samples from the northern portion of the bottom of excavation, together with two of the five samples from the contaminated soil stockpile. Two additional soil samples were collected and tested in 1998 resulting in non-detected.

NFA Determination in 2012



The site maintained a LUST status until 2012 when the Ecology was requested to review the cleanup information and issue a recommendation. The Ecology reviewed all submitted information related to the reported release and a No Further Action letter was issued by Ecology on August 31, 2012

Phase I ESA (Envitechnology, Inc. September 4, 2020)

A Phase I Environmental Site Assessment was recently conducted by Envitechnology, Inc. dated August 25, 2020. The assessment revealed the following recognized environmental condition (REC).

The fueling service station has been present at the Subject Property for 43 years. Based on the age of the current UST system (26 years), lack of recent analytical soil and/or groundwater data, and the possibility that releases may occur from tanks or tank system that are otherwise testing as tight, there is a potential risk that a release from the USTs that affected the subsurface of the Subject Property. As such, the presence of current USTs at the Subject Property represents a recognized environmental condition (REC).



4. FIELD INVESTIGATIONS

4.1. UTILITY LOCATION

Prior to conducting the next phase of the field investigation, Envitechnology requested Public Utility locating service to check proposed boring locations for the presence of underground utilities.

Envitechnology subcontracted with Mt View Locating Services, LLC., Sumner, WA to perform an additional site-specific utility clearance on the subject property prior to drilling. Underground utilities that were detected were spray painted on the surface of the subject property. All drilling locations were completed without encountering underground utilities or obstructions during the collection of soil samples on the Subject Property.

4.2. GEOPHYSICAL SURVEY

Because of the limited information regarding the configuration of UST system, geophysical survey was conducted at the Site. Envitechnology subcontracted with Mt View Locating Services, LLC., Sumner, WA to perform a geophysical survey. The geophysical survey employs the use of both electro-magnetic (EM) equipment and ground penetrating radar (GPR) to screen the Site for subsurface anomalies characteristics of USTs and other buried metallic objects.

A magnetometer is a measuring instrument used to measure the strength and the direction of magnetic field. Magnetometer is widely used for measuring the earth's magnetic fields and in geophysical surveys. The magnetic properties of naturally occurring materials such as magnetic ore bodies and basic igneous rocks allows them to be identified and mapped by magnetic surveys. Strong local magnetic fields or anomalies are also produced by buried steel objects. Magnetometer surveys find underground storage tanks, drums, piles and reinforced concrete foundations by detecting the magnetic anomalies they produce.

Ground Penetrating Radar (GPR) is a geophysical method that uses radar pulses to image the subsurface which is the most common method used to locate underground storage tanks (USTs). The USTs can be made of metal or any other material that has different electrical or conductive properties than the surrounding subsurface oil and rocks. The GPR can determine the boundaries of current and/or former UST excavations.



4.3. HEALTH AND SAFETY

A Site-Specific Health and Safety Plan was prepared prior to field activities. Envitechnology performed air monitoring for total VOC during all field activities and also enforced the appropriate protective equipment including hard hats, safety glasses, hearing protection, steel-toed boots, and chemical resistant gloves. Air monitoring performed throughout the day indicated that the use of breathing protection equipment was not necessary.

4.4. EXPLORATION METHODS

A total of six (6) soil borings were advanced into native soils on September 1, 2020, as follows:

- Three (3) borings (B1 through B3) were advanced in the vicinity of the UST pad.
- Two (2) borings (B4 and B5) were advanced in the vicinity of the fueling dispensers.
- One (1) boring (B6) was advanced in the vicinity of former UST pit.

Each of soil borings were advanced to 15 feet bgs, with the exception of boring B1, which was met with refusal at 14 feet bgs.

The method of boring was a direct push probe (Geoprobe Systems Model 6600) performed by Standard Environmental Probe Inc., which involves the use of truck-mounted hydraulic hammer to push a series of 1.5-inch diameter steel rods to the sampling depth. Every five feet, the rods were removed and disposable Teflon sampling tubes were recovered. New sections of Teflon sampling tubes were used for each sampling depth.

Each borehole was logged according to the United Soil Classification System as described in Figure A1 in Appendix A. Borehole logs are included in Appendix A as Figure A2 through A7.

The location of the borings is shown in Figure 3. Site Plan.

4.5. SUBSURFACE SOIL SAMPLING METHODS

The sampling was designed to prove for the collection of potentially contaminated environmental media, if they occur, at locations and depths where the highest concentrations are likely to occur.



Total six (6) soil samples were collected, one sample per each borehole, as follows:

- Three (3) soil samples (B1-14 through B3-15) were collected in the vicinity of UST pad at a depth ranging from 14 to 15 feet bgs.
- Two (2) soil samples (B4-10 and B5-10) were collected in the vicinity of fueling dispensers at a depth of 10 feet bgs.
- One (1) soil sample (B6-15) was collected in the vicinity of the former UST pit at a depth of 15 feet bgs.

The undisturbed soil samples were gathered continuously using core samplers attached to drive rods. One sample per each borehole was collected in accordance with EPA method 5035A. (US EPA, 2002). Soil samples were recovered using a hand sampler to take about 5 grams of soil from each soil core. Samples were transferred from the samplers directly to sterilized glassware with Teflon-sealed lids furnished by the project laboratory. Samples were stored in an iced chest at the site and taken to the lab in this condition to minimize excessive dissipation of volatile fraction hydrocarbons. Each container was clearly labeled as to boring number, sample number, geologist, etc. EPA recommended 5035 sampling protocol for sample collection and management including maintenance of chain-of-custody documentation was observed at each stage of the project. Each sample was collected into a two-ounce jar for dry weight determination.

4.6. GROUNDWATER SAMPLING METHODS

Groundwater was not encountered during soil borings to a depth of boring refusal at 15 feet bgs.

4.7. FIELD SCREENING

Soil samples obtained from the core sampler were screened with visual and olfactory indications and/or photoionization detector (PID). Prior to use, the PID was calibrated against a 100 parts per million (ppm) isobutylene span gas in air mixture. The instrument was then zeroed against the ambient air near the work area. The PID is useful for qualitative field screening of volatile organic compounds (VOCs) and provides a basis for comparison between soil samples collected in the field. Soil samples were placed into sealable plastic bags and allowed to sit in a warm area for volatilization to occur. After approximately 5 minutes, VOCs were field measured by placing the tip of the PID into the head space above each sample in each bag. This is not a compound-specific analysis and is affected by, among other influences, climate (e.g., temperature and humidity), soil type and conditions, instrument calibration and operation, and type of VOCs present.



4.8. CHEMICAL ANALYTICAL METHODS

The chemical testing was designed to detect the contaminants suspected to be present in the samples collected. The testing plan included tests which provide quality assurance (QA) and techniques that provide quality control (QC) over the chemical analysis. A completed chain of custody record accompanied each sample shipment to the analytical laboratory. Chain of custody records provide written documentation regarding sample collection and handling, identify the persons involved in the chain of sample possession, and a written record of requested analytical parameters.

The soil samples were analyzed for the presence of petroleum contaminants – gasoline range organics (GRO) via NWTPH-Gx, benzene, toluene, ethylbenzene, and xylene (BTEX) via EPA Method 8260D, and diesel range organics (DRO) & heavy oil range organics (ORO) via NWTPH-Dx.

The location, depth and type of samples collected are summarized in Table 1.

4.9. DECONTAMINATION AND HOLE CLOSURE

Boreholes were filled with bentonite granules, 2 feet of concrete mix, and patched with asphalt. Disposable sampling equipment were disposed of at each sample interval. Non-disposable sampling equipment were decontaminated by scrubbing in a solution of Alconox and potable water, followed by rinses with potable water between test holes. Soil cuttings, decontamination water, and purge water were stored in labeled drums in a secure location until they can be profiled and appropriately disposed of.



5. ANALYTICAL RESULTS

5.1. SUBSURFACE CONDITIONS

A general characterization of the on-site soil units encountered during our exploration is presented in this section. The Boring Logs in Appendix A present details of the soil encountered at each exploration location.

The soil borings were extended up to 15 feet below ground surface (ft bgs). The surface cover at the Site consists of asphalt. Native soils beneath fill or other surface cover materials include a layer of dark brown, dry, silty GRAVEL to a depth of 5 feet bgs, underlain by a layer of light brown to grayish brown, dry, silty GRAVEL with varying amount of sand to a depth of 13 feet bgs, and underlain by a layer of gray, moist, poorly graded SAND to a depth of boring refusal at 14 – 15 ft bgs. Groundwater was not observed during soil exploration to a depth of 15 feet bgs.

A zone of gray-stained sand exhibiting a slight to moderate petroleum odor was observed at depths ranging from 13 to 15 feet bgs in the borehole B2. VOCs were also detected in the soil sample B2-15, when screened with a MiniRae 3000 Photoionization Detector (PID).

5.2. GEOPHYSICAL SURVEY

Prior to conducting the subsurface investigation, a geophysical survey using electromagnetic (EM) equipment and ground penetrating radar (GPR) was conducted. The ground penetrating radar (GPR) survey did not reveal the presence of any anomaly indicative of former USTs at the Site. However, the survey identified buried electric lines, underground utilities, former UST excavation pit and other buried objectives at the Site.

5.3. SOIL ANALYTICAL RESULTS

The soil analytical results along with the Washington State Department of Ecology (WSDOE) cleanup levels are summarized in Table 2. Laboratory documents are located in Appendix D. Laboratory Report.

The following is the summary of the laboratory results:

- Elevated concentrations of BTEX and GRO were identified in the soil sample B2-15. Benzene, xylene and GRO were identified at concentrations exceeding their MTCA Method A cleanup levels.



- GRO also identified in B3-15 and B4-10 at concentrations below the MTCA Method A cleanup levels. ORO was identified in B6-15 at concentration below the MTCA Method A cleanup level.
- Other petroleum contaminants were all below the laboratory detection limits.

Based on the result of this assessment, benzene, xylene and GRO exceeding their MTCA Method A cleanup levels were identified in the soil sample (B2-15) at the Subject Property.



6. PROPOSED CLEANUP STANDARD

6.1. RECOGNIZED ENVIRONMENTAL CONDITIONS

The recognized on-site environmental concerns assessed as part of this Phase II ESA were as follows:

The fueling service station has been present at the Subject Property for 43 years. Based on the age of the current UST system (26 years), lack of recent analytical soil and/or groundwater data, and the possibility that releases may occur from tanks or tank system that are otherwise testing as tight, there is a potential risk that a release from the USTs that affected the subsurface of the Subject Property. As such, the presence of current USTs at the Subject Property represents a recognized environmental condition (REC).

6.2. CONCEPTUAL SITE MODEL

The conceptual site model takes into consideration the potential distribution of contaminants with respect to the properties, behaviors and fate and transport characteristics of the contaminant in a setting such as that being assessed. The sampling plan was designed to provide for the collection of potentially contaminated environmental media, if they occur, at locations and depths where the higher concentrations are likely to occur.

The source of COCs (Chemicals of Concern) is the operations of the property as a fueling service station. The historical use of USTs would likely have contained fuel. Based on the age of the service station, typical operation procedures at that time likely resulted in spills, drips, and/or leaks of petroleum compounds.

Contaminants of Concern (COCs) include the following:

- Total petroleum hydrocarbons – gasoline (GRO), gasoline (DRO) and heavy oil (ORO)
- Benzene, toluene, ethylbenzene, and xylene (BTEX)

The possible exposure pathways and the related potential receptors associated with soil impacted by COCs include the following:

- Soil Ingestion, Dermal Contact, and inhalation Exposure Pathway. For the Residential and Occupational receptor scenario, this exposure pathway must be considered when contamination is present in the upper 3 feet of soils. According



to the Conceptual Site Model, this exposure pathway is potentially complete for current and future Urban Residential and Occupational, Construction and Excavation receptors. PID reading on the soil samples collected from a depth to 5 feet bgs indicates that VOCs were not detected in those samples. Petroleum hydrocarbon constituents did not exceed RBCs (Risk Based Concentrations) for this exposure pathway.

- *Soil Volatilization to Outdoor Air Pathway.* Based on the Conceptual Site Model this exposure pathway is potentially complete for current and future Urban Residential, Occupational, Construction and Excavation receptors. Volatile COCs were detected in the soil sample for potential receptors via this exposure pathway.
- *Soil Vapor Intrusion into Buildings Pathway.* Based on the Conceptual Site Model this exposure pathway is potentially complete for current and future Urban Residential, Occupational, Construction and Excavation receptors. Volatile COCs were detected in the soil sample for potential receptors via this exposure pathway.
- *Soil Leaching to Groundwater.* Based on the Conceptual Site Model this exposure pathway is not included. Groundwater was not encountered during soil borings up to 15 feet bgs. Moreover, shallow groundwater is unlikely to be used as a potable water resource in the area of the Subject Property.

6.3. AFFECTED MEDIA

Based on the results of this assessment, impacted soil above applicable or relevant and appropriate requirements ("ARARs") was identified.

The data gathered during this assessment is sufficient to determine whether products were released or disposed at the property. With respect to the recognized environmental conditions assessed, petroleum products have been released or disposed on the Subject Property.

6.4. PROPOSED CLEANUP LEVELS

MTCA (Model Toxics Control Act) requires that cleanup actions meet cleanup standards. These standards are comprised of both cleanup levels and points of compliance. A cleanup level is the concentration of hazardous substance in soil, water, air, or sediment that is determined to be protective of human health and the environment under specified exposure conditions. A point of compliance (POC) defines the point or points on a site



where cleanup levels must be met. MTCA provides three options for establishing cleanup levels, as described below:

- **Method A: Applicable Laws and Tables.** Method A is designed for cleanups that are relatively straightforward or involve only a few hazardous substances. This method consists of tabularized cleanup levels for the most common hazardous substances found in soil and groundwater, including those constituents identified at this site
- **Method B: Universal Method.** MTCA B cleanup levels are established using applicable state and federal laws and the risk equations and other requirements specified for each medium. Method B is divided into two tiers – standard and modified. Standard Method B uses generic default assumptions to calculate cleanup levels. Modified Method B provides for the use of chemical-specific or site-specific information to change selected default assumptions. For both standard and modified Method B, the human health risk level for individual carcinogens must not exceed one-in-a-million. If more than one type of hazardous substance is present, the total risk level at the site may not exceed 1 in 100,000. Levels for non-carcinogens cannot exceed a hazard quotient of 1. In addition to accounting for human health impacts, the Method B cleanup levels must account for potential terrestrial or aquatic ecological impacts, if present at the site.
- **Method C: Conditional Method.** Method C is similar to Method B in that it is divided into two tiers – standard and modified. The main differences are: (1) cleanup levels are based on less stringent exposure assumptions and (2) the lifetime cancer risk is set at 1 in 100,000 for both individual substances and for the total cancer risk caused by all substances at a site.

The MTCA cleanup levels proposed for the Site are MTCA Method A cleanup levels for soil. MTCA Method A cleanup levels are appropriate for the Site because it was a typical retail fueling station without a complex mix of COCs. (See Appendix C. Method A Cleanup Levels).

6.5. OTHER CONCERNS

There were no other concerns identified during this Phase II ESA.

6.6. CONCLUSIONS



Laboratory analysis of the soil samples for GRO, DRO, ORO and BTEX indicated that benzene, xylene and GRO exceeding their MTCA Method A cleanup levels were identified in the soil sample (B2-15) at the Subject Property.

Based on the result of this assessment, petroleum contamination was identified at the Subject Property.



7. RECOMMENDATIONS

Based on the results of this assessment, the following is recommended:

1. Envitechnology recommends additional subsurface investigation in order to verify the lateral and vertical extent and magnitude of contamination.
2. To achieve lawful compliance with Chapter 173-340-300 (site discovery and reporting), Envitechnology recommends that copies of this report along with any future reports regarding the environmental conditions thus far encountered be forwarded to the Washington State Department of Ecology.



REFERENCES AND SOURCE OF INFORMATION

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TABLES

**Table 1. Location, Depth and Type of Samples Collected**

Sample ID	Sample type	Depth (ft)	Location	Compound of concern	Analysis method	Date collected
B1-14	Soil	14	B1	GRO, BTEX DRO, ORO	NWTPH-Gx/8260D TWTPH-Dx	9/1/2020 10:30
B2-15	Soil	15	B2	GRO, BTEX DRO, ORO	NWTPH-Gx/8260D TWTPH-Dx	9/1/2020 11:00
B3-15	Soil	15	B3	GRO, BTEX DRO, ORO	NWTPH-Gx/8260D TWTPH-Dx	9/1/2020 11:17
B4-10	Soil	10	B4	GRO, BTEX DRO, ORO	NWTPH-Gx/8260D TWTPH-Dx	9/1/2020 11:40
B5-10	Soil	10	B5	GRO, BTEX DRO, ORO	NWTPH-Gx/8260D TWTPH-Dx	9/1/2020 12:00
B6-15	Soil	15	B6	GRO, BTEX DRO, ORO	NWTPH-Gx/8260D TWTPH-Dx	9/1/2020 12:30

Notes

GRO – Gasoline range organics

BTEX – Benzene, toluene, ethyl benzene & xylene

DRO – Diesel range organics

ORO – Heavy oil range organics

**Table 2. Summary of Soil Analytical Results (mg/kg)**

	BTEX				TPH		
Samples	Benzene	Toluene	Ethyl benzene	Xylene	GRO	DRO	ORO
B1-14	<0.02	<0.10	<0.05	<0.15	<10	<50	<250
B2-15	0.032	0.11	3.5	18	190	<50	<250
B3-15	<0.02	<0.10	<0.05	<0.15	16	<50	<250
B4-10	<0.02	<0.10	<0.05	<0.15	19	<50	<250
B5-10	<0.02	<0.10	<0.05	<0.15	<10	<50	<250
B6-15	<0.02	<0.10	<0.05	<0.15	<10	<50	500
STD	0.03	7	6	9	30/100*	2,000	2,000

Notes

STD: Method A Soil Cleanup Levels for Unrestricted Land Uses (Table 740-1).

BTEX – Benzene, toluene, ethyl benzene & xylene

TPH – Total petroleum hydrocarbon

GRO – Gasoline range organics

DRO – Diesel range organics

ORO – Heavy oil range organics

* - The lower value of 30 mg/kg can be used at any site. When using this lower value, the soil must also be tested for and meet the benzene soil cleanup level. The higher value of 100 mg/kg can only be used if the soil is tested and found to contain no benzene and the total of ethyl benzene, toluene and xylene are less than 1% of the gasoline mixture.

Numbers in bold red indicate concentrations over the MTCA Method A cleanup levels.



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FIGURES

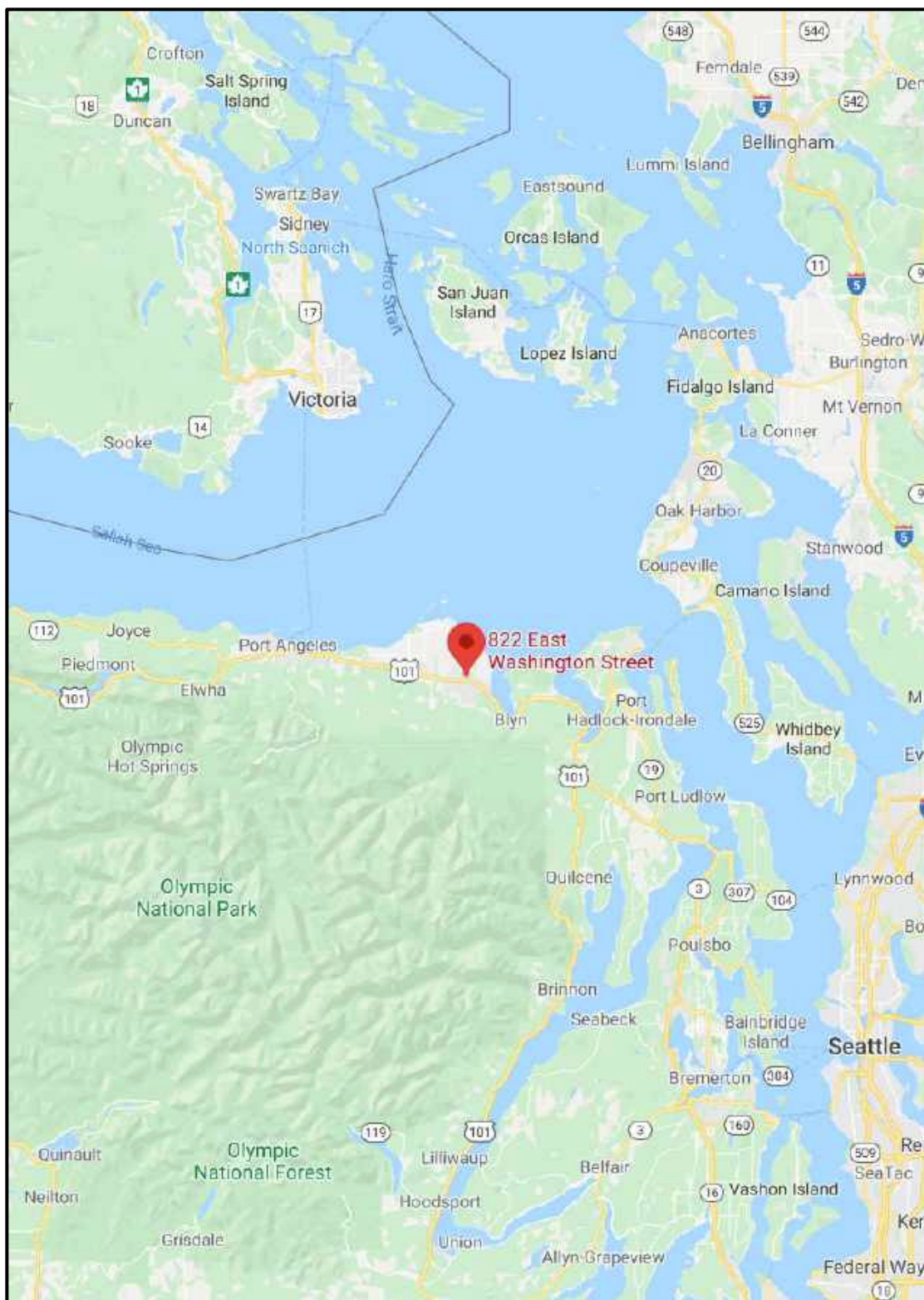


Figure 1. Site Location Map

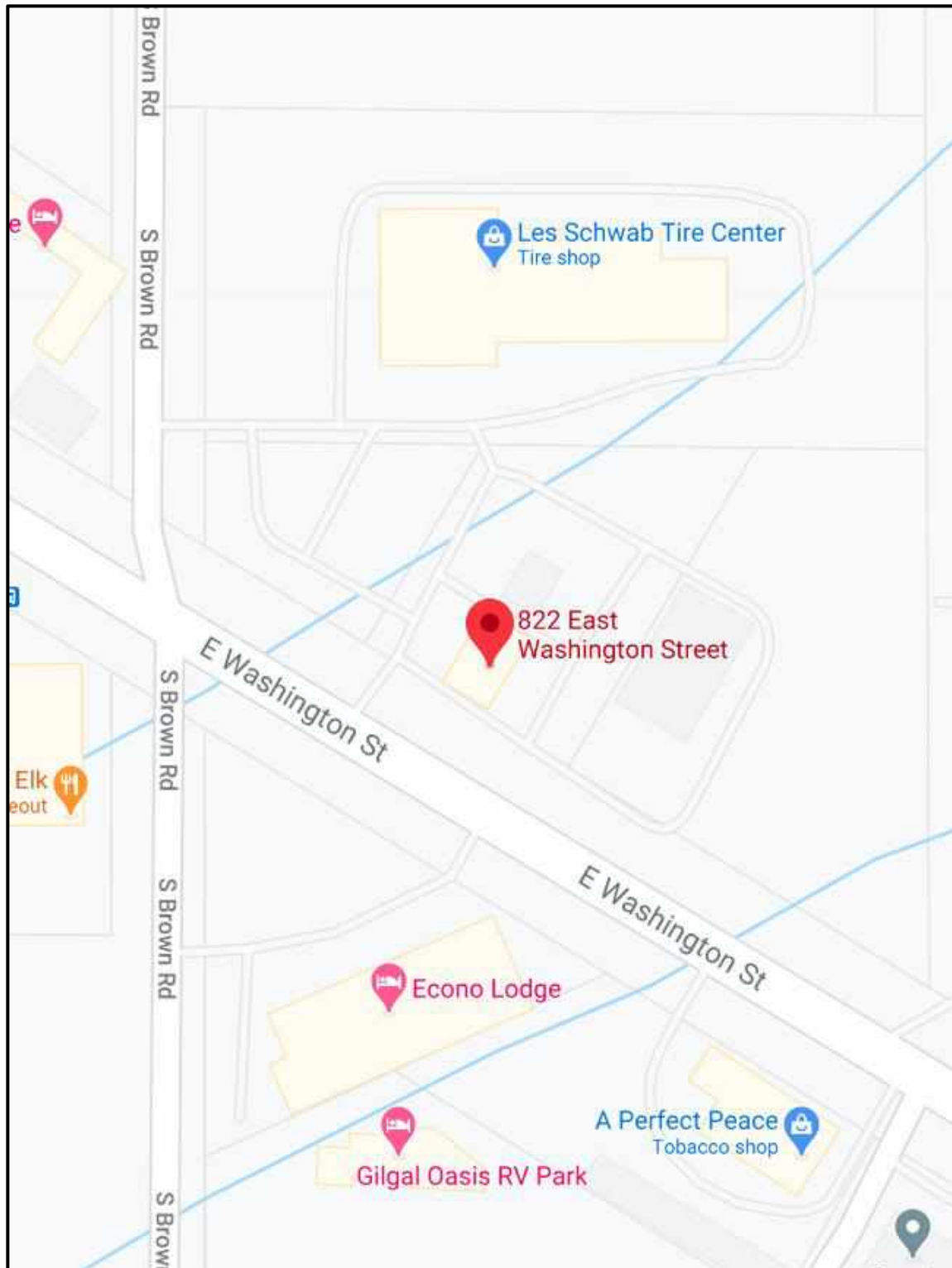


Figure 2. Site Vicinity Map

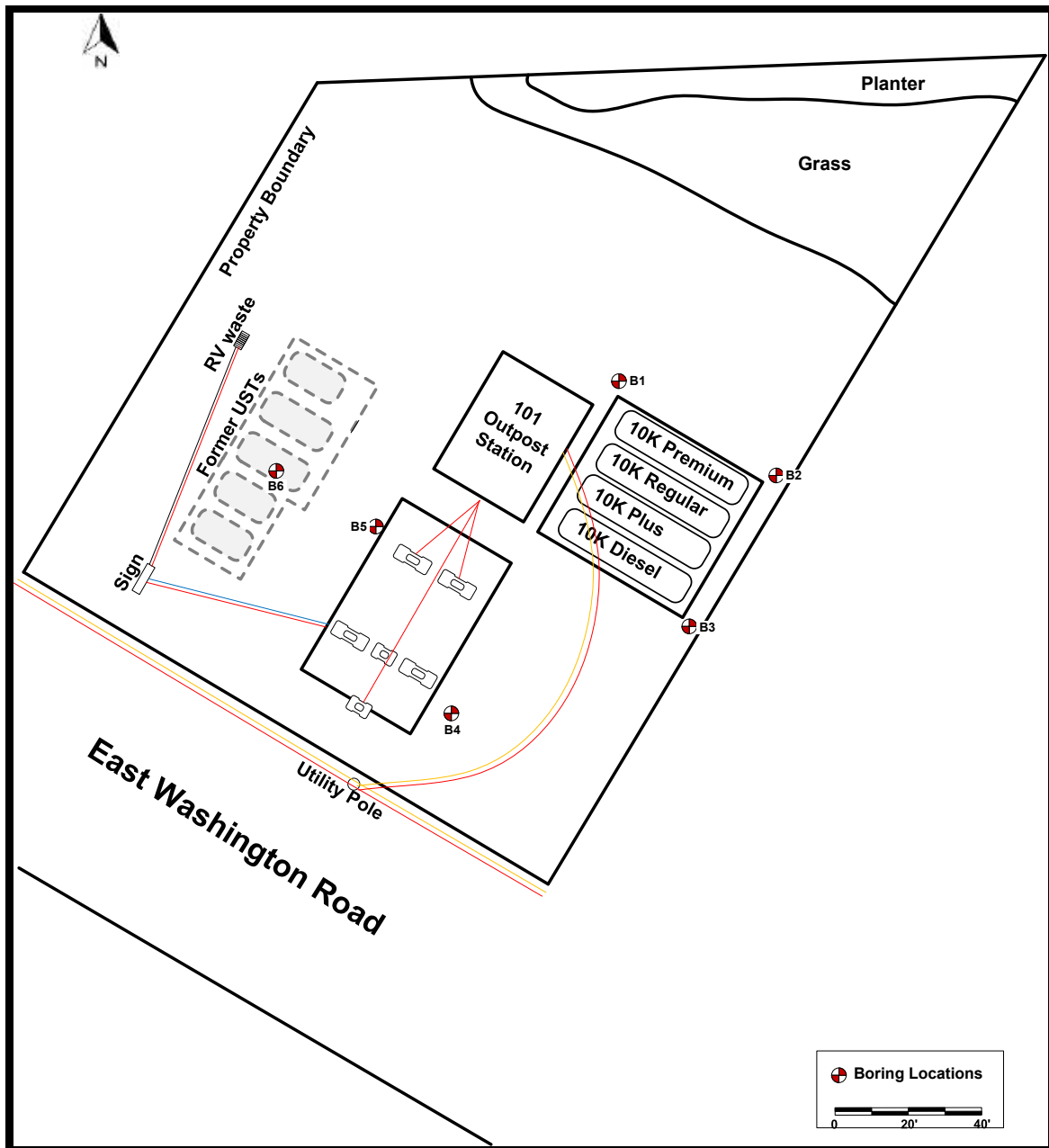


Figure 3. Site Plan



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APPENDICES



APPENDIX A. BORING LOGS





Unified Soil Classification System Chart

Major Divisions			Graph	USCS	Typical Description
Coarse Grained Soils More Than 50% Retained On No. 200 Sieve	Gravel More Than 50% of Coarse Fraction Retained On No. 4 Sieve	Clean Gravels		GW	Well-graded Gravels, Gravel-Sand Mixtures
				GP	Poorly-Graded Gravels, Gravel-Sand Mixtures
		Gravels With Fines		GM	Silty Gravels, Gravel-Sand-Silt Mixtures
				GC	Clayey Gravels, Gravel-Sand-Clay Mixtures
	Sand More Than 50% of Coarse Fraction Passing No. 4 Sieve	Clean Sands		SW	Well-graded Sands, Gravelly Sands
				SP	Poorly-Graded Sands, Gravelly Sands
		Sands With Fines		SM	Silty Sands, Sand-Silt Mixtures
				SC	Clayey Sands, Clay Mixtures
Fine Grained Soils More Than 50% Passing The No. 200 Sieve	Silts & Clays Liquid Limit Less Than 50	Liquid Limit Less Than 50		ML	Inorganic Silts, rock Flour, Clayey Silts With Low Plasticity
				CL	Inorganic Clays of Low To Medium Plasticity
				OL	Organic Silts and Organic Silty Clays of Low Plasticity
	Silts & Clays Liquid Limit Greater Than 50	Liquid Limit Greater Than 50		MH	Inorganic Silts of Moderate Plasticity
				CH	Inorganic Clays of High Plasticity
				OH	Organic Clays And Silts of Medium to High Plasticity
Highly Organic Soils				PT	Peat, Humus, Soils with Predominantly Organic Content



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The Unified Soil Classification System (USCS)

9/1/2020

Figure A1



Log of Borehole – B1								
Project: 101 Outpost Station					Elevation: 147 ft. above sea level			
Loc: 822 E Washington St., Sequim, WA 98382					Drilling Method: Geoprobe (Model 6600)			
Driller: Standard Environmental Probe					Logged by: Jake Lee			
Depth (ft)	Well	Water Table	Symbol	USCS	Soil Sample	Water sample	PID Reading	Soil Description
	NO WELL CONSTRUCTED			GM	B1-14		0.2	Top asphalt
							0.2	Dark brown, silty GRAVEL
								Gravel-silt-sand mixture
5								Medium dense, dry
10								
15								
20								



Log of Borehole – B2								
Project: 101 Outpost Station					Elevation: 147 ft. above sea level			
Loc: 822 E Washington St., Sequim, WA 98382					Drilling Method: Geoprobe (Model 6600)			
Driller: Standard Environmental Probe					Logged by: Jake Lee			
Depth (ft)	Well	Water Table	Symbol	USCS	Soil Sample	Water sample	PID Reading	Soil Description
	NO WELL CONSTRUCTED			GM	B2-15		0.3	Top asphalt
5							0.3	Dark brown, silty GRAVEL Gravel-silt-sand mixture Medium dense, dry
								Light brown to grayish brown Silty GRAVEL with varying amount of sand. Medium dense, dry
10							0.2	
								Become moist, medium dense Gray stained SAND, poorly graded Gasoline odor, soil sample B2-15 @11:00
15							120	Boring refusal at 15 feet bgs. No groundwater encountered.
</								



Log of Borehole – B3								
Project: 101 Outpost Station					Elevation: 147 ft. above sea level			
Loc: 822 E Washington St., Sequim, WA 98382					Drilling Method: Geoprobe (Model 6600)			
Driller: Standard Environmental Probe					Logged by: Jake Lee			
Depth (ft)	Well	Water Table	Symbol	USCS	Soil Sample	Water sample	PID Reading	Soil Description
	NO WELL CONSTRUCTED			GM	B3-15		0.2	Top asphalt
							0.4	Dark brown, silty GRAVEL
								Gravel-silt-sand mixture
5								Medium dense, dry
10								
15								
	</							



Log of Borehole – B4													
Project: 101 Outpost Station					Elevation: 147 ft. above sea level								
Loc: 822 E Washington St., Sequim, WA 98382					Drilling Method: Geoprobe (Model 6600)								
Driller: Standard Environmental Probe					Logged by: Jake Lee								
Depth (ft)	Well	Water Table	Symbol	USCS	Soil Sample	Water sample	PID Reading	Soil Description					
	NO WELL CONSTRUCTED			GM	B4-10		0.2	Top asphalt					
												Dark brown, silty GRAVEL	
												Gravel-silt-sand mixture, medium dense, dry	
5												Red, silty GRAVEL	
10													Light brown to grayish brown
													Silty GRAVEL with varying amount of sand.
													Medium dense, dry
												3.2	Soil sample, B4-10 at 11:40
15													
							0.1						
								Boring refusal at 15 feet bgs.					
								No groundwater encountered.					
20													



Log of Borehole – B5								
Project: 101 Outpost Station					Elevation: 147 ft. above sea level			
Loc: 822 E Washington St., Sequim, WA 98382					Drilling Method: Geoprobe (Model 6600)			
Driller: Standard Environmental Probe					Logged by: Jake Lee			
Depth (ft)	Well	Water Table	Symbol	USCS	Soil Sample	Water sample	PID Reading	Soil Description
	NO WELL CONSTRUCTED			GM	B5-10		0.2	Top asphalt Dark brown, silty GRAVEL Gravel-silt-sand mixture, medium dense, dry
5		0.3					Light brown to grayish brown Silty GRAVEL with varying amount of sand. Medium dense, dry	
10		1.2					Soil sample, B5-10 at 12:00	
15		0.1					Boring refusal at 15 feet bgs. No groundwater encountered.	
20								
 ENVITECHNOLOGY www.envitechnology.com support@envitechnology.com Tel 425.890.3517 Fax 425.310.6600 9805 NE 116th St, Suite 300, Kirkland, WA 98034							101 Outpost Station	
							9/1/2020	Figure A6



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APPENDIX B. SITE PHOTOGRAPHS

B



Photo 1. A view of the Subject Property looking north.



Photo 2. A front view of the Subject Property looking northeast.



Photo 3. A view of the canopy and dispensers looking southeast.



Photo 4. A view of the convenience store looking northeast.



Photo 5. A view of the UST pad looking northwest.



Photo 6. A view of the location of the former UST pit.



Photo 7. A view of the private locating.



Photo 8. A view of the GPR survey.



Photo 9. A view of the soil boring – B1.



Photo 10. A view of the soil boring – B2.



Photo 11. A view of the soil boring – B3.



Photo 12. A view of the soil boring – B4.



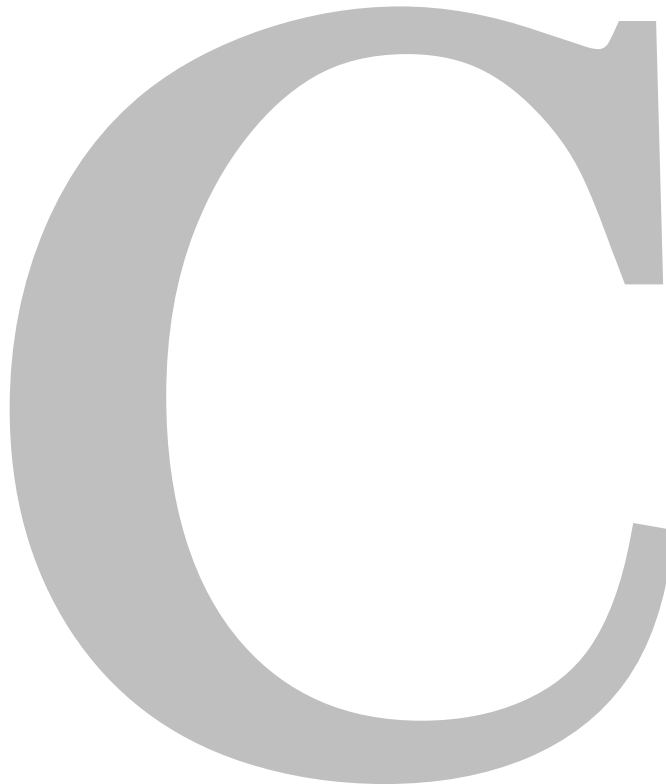
Photo 13. A view of the soil boring – B5.



Photo 14. A view of the soil boring – B6.



APPENDIX C. METHOD A CLEANUP LEVELS



WAC 173-340-900 Tables.

Footnotes:

Table 720-1
Method A Cleanup Levels for Ground Water.^a

Hazardous Substance	CAS Number	Cleanup Level
Arsenic	7440-38-2	5 ug/liter ^b
Benzene	71-43-2	5 ug/liter ^c
Benzo(a)pyrene	50-32-8	0.1 ug/liter ^d
Cadmium	7440-43-9	5 ug/liter ^e
Chromium (Total)	7440-47-3	50 ug/liter ^f
DDT	50-29-3	0.3 ug/liter ^g
1,2 Dichloroethane (EDC)	107-06-2	5 ug/liter ^h
Ethylbenzene	100-41-4	700 ug/liter ⁱ
Ethylene dibromide (EDB)	106-93-4	0.01 ug/liter ^j
Gross Alpha Particle Activity		15 pCi/liter ^k
Gross Beta Particle Activity		4 mrem/yr ^l
Lead	7439-92-1	15 ug/liter ^m
Lindane	58-89-9	0.2 ug/liter ⁿ
Methylene chloride	75-09-2	5 ug/liter ^o
Mercury	7439-97-6	2 ug/liter ^p
MTBE	1634-04-4	20 ug/liter ^q
Naphthalenes	91-20-3	160 ug/liter ^r
PAHs (carcinogenic)		See benzo(a)pyrene ^d
PCB mixtures		0.1 ug/liter ^s
Radium 226 and 228		5 pCi/liter ^t
Radium 226		3 pCi/liter ^u
Tetrachloroethylene	127-18-4	5 ug/liter ^v
Toluene	108-88-3	1,000 ug/liter ^w
Total Petroleum Hydrocarbons ^x		
[Note: Must also test for and meet cleanup levels for other petroleum components--see footnotes!]		
Gasoline Range Organics		
Benzene present in ground water		800 ug/liter
No detectable benzene in ground water		1,000 ug/liter
Diesel Range Organics		500 ug/liter
Heavy Oils		500 ug/liter
Mineral Oil		500 ug/liter
1,1,1 Trichloroethane	71-55-6	200 ug/liter ^y
Trichloroethylene	79-01-6	5 ug/liter ^z
Vinyl chloride	75-01-4	0.2 ug/liter ^{aa}
Xylenes	1330-20-7	1,000 ug/liter ^{bb}

- a Caution on misusing this table.** This table has been developed for specific purposes. It is intended to provide conservative cleanup levels for drinking water beneficial uses at sites undergoing routine cleanup actions or those sites with relatively few hazardous substances. This table may not be appropriate for defining cleanup levels at other sites. For these reasons, the values in this table should not automatically be used to define cleanup levels that must be met for financial, real estate, insurance coverage or placement, or similar transactions or purposes. Exceedances of the values in this table do not necessarily mean the ground water must be restored to those levels at all sites. The level of restoration depends on the remedy selected under WAC 173-340-350 through 173-340-390.
- b Arsenic.** Cleanup level based on background concentrations for state of Washington.
- c Benzene.** Cleanup level based on applicable state and federal law (WAC 246-290-310 and 40 C.F.R. 141.61).
- d Benzo(a)pyrene.** Cleanup level based on applicable state and federal law (WAC 246-290-310 and 40 C.F.R. 141.61), adjusted to a 1×10^{-5} risk. If other carcinogenic PAHs are suspected of being present at the site, test for them and use this value as the total concentration that all carcinogenic PAHs must meet using the toxicity equivalency methodology in WAC 173-340-708(8).
- e Cadmium.** Cleanup level based on applicable state and federal law (WAC 246-290-310 and 40 C.F.R. 141.62).
- f Chromium (Total).** Cleanup level based on concentration derived using Equation 720-1 for hexavalent chromium. This is a total value for chromium III and chromium VI. If just chromium III is present at the site, a cleanup level of 100 ug/l may be used (based on WAC 246-290-310 and 40 C.F.R. 141.62).
- g DDT (dichlorodiphenyltrichloroethane).** Cleanup levels based on concentration derived using Equation 720-2.
- h 1,2 Dichloroethane (ethylene dichloride or EDC).** Cleanup level based on applicable state and federal law (WAC 246-290-310 and 40 C.F.R. 141.61).
- i Ethylbenzene.** Cleanup level based on applicable state and federal law (WAC 246-290-310 and 40 C.F.R. 141.61).
- j Ethylene dibromide (1,2 dibromoethane or EDB).** Cleanup level based on concentration derived using Equation 720-2, adjusted for the practical quantitation limit.
- k Gross Alpha Particle Activity, excluding uranium.** Cleanup level based on applicable state and federal law (WAC 246-290-310 and 40 C.F.R. 141.15).
- l Gross Beta Particle Activity, including gamma activity.** Cleanup level based on applicable state and federal law (WAC 246-290-310 and 40 C.F.R. 141.15).
- m Lead.** Cleanup level based on applicable state and federal law (40 C.F.R. 141.80).
- n Lindane.** Cleanup level based on applicable state and federal law (WAC 246-290-310 and 40 C.F.R. 141.61).
- o Methylene chloride (dichloromethane).** Cleanup level based on applicable state and federal law (WAC 246-290-310 and 40 C.F.R. 141.61).
- p Mercury.** Cleanup level based on applicable state and federal law (WAC 246-290-310 and 40 C.F.R. 141.62).
- q Methyl tertiary-butyl ether (MTBE).** Cleanup level based on federal drinking water advisory level (EPA-822-F-97-009, December 1997).
- r Naphthalenes.** Cleanup level based on concentration derived using Equation 720-1. This is a total value for naphthalene, 1-methyl naphthalene and 2-methyl naphthalene.
- s PCB mixtures.** Cleanup level based on concentration derived using Equation 720-2, adjusted for the practical quantitation limit. This cleanup level is a total value for all PCBs.
- t Radium 226 and 228.** Cleanup level based on applicable state and federal law (WAC 246-290-310 and 40 C.F.R. 141.15).
- u Radium 226.** Cleanup level based on applicable state law (WAC 246-290-310).

- v **Tetrachloroethylene.** Cleanup level based on applicable state and federal law (WAC 246-290-310 and 40 C.F.R. 141.61).
- w **Toluene.** Cleanup level based on applicable state and federal law (WAC 246-290-310 and 40 C.F.R. 141.61).
- x **Total Petroleum Hydrocarbons (TPH).** TPH cleanup values have been provided for the most common petroleum products encountered at contaminated sites. Where there is a mixture of products or the product composition is unknown, samples must be tested using both the NWTPH-Gx and NWTPH-Dx methods and the lowest applicable TPH cleanup level must be met.
- **Gasoline range organics** means organic compounds measured using method NWTPH-Gx. Examples are aviation and automotive gasoline. The cleanup level is based on protection of ground water for noncarcinogenic effects during drinking water use. Two cleanup levels are provided. The higher value is based on the assumption that no benzene is present in the ground water sample. If any detectable amount of benzene is present in the ground water sample, then the lower TPH cleanup level must be used. No interpolation between these cleanup levels is allowed. The ground water cleanup level for any carcinogenic components of the petroleum [such as benzene, EDB and EDC] and any noncarcinogenic components [such as ethylbenzene, toluene, xylenes and MTBE], if present at the site, must also be met. See Table 830-1 for the minimum testing requirements for gasoline releases.
- **Diesel range organics** means organic compounds measured using NWTPH-Dx. Examples are diesel, kerosene, and #1 and #2 heating oil. The cleanup level is based on protection from noncarcinogenic effects during drinking water use. The ground water cleanup level for any carcinogenic components of the petroleum [such as benzene and PAHs] and any noncarcinogenic components [such as ethylbenzene, toluene, xylenes and naphthalenes], if present at the site, must also be met. See Table 830-1 for the minimum testing requirements for diesel releases.
- **Heavy oils** means organic compounds measured using NWTPH-Dx. Examples are #6 fuel oil, bunker C oil, hydraulic oil and waste oil. The cleanup level is based on protection from noncarcinogenic effects during drinking water use, assuming a product composition similar to diesel fuel. The ground water cleanup level for any carcinogenic components of the petroleum [such as benzene, PAHs and PCBs] and any noncarcinogenic components [such as ethylbenzene, toluene, xylenes and naphthalenes], if present at the site, must also be met. See Table 830-1 for the minimum testing requirements for heavy oil releases.
- **Mineral oil** means non-PCB mineral oil, typically used as an insulator and coolant in electrical devices such as transformers and capacitors measured using NWTPH-Dx. The cleanup level is based on protection from noncarcinogenic effects during drinking water use. Sites using this cleanup level must analyze ground water samples for PCBs and meet the PCB cleanup level in this table unless it can be demonstrated that: (1) The release originated from an electrical device manufactured after July 1, 1979; or (2) oil containing PCBs was never used in the equipment suspected as the source of the release; or (3) it can be documented that the oil released was recently tested and did not contain PCBs. Method B (or Method C, if applicable) must be used for releases of oils containing greater than 50 ppm PCBs. See Table 830-1 for the minimum testing requirements for mineral oil releases.
- y **1,1,1 Trichloroethane.** Cleanup level based on applicable state and federal law (WAC 246-290-310 and 40 C.F.R. 141.61).
- z **Trichloroethylene.** Cleanup level based on applicable state and federal law (WAC 246-290-310 and 40 C.F.R. 141.61).
- aa **Vinyl chloride.** Cleanup level based on applicable state and federal law (WAC 246-290-310 and 40 C.F.R. 141.61), adjusted to a 1×10^{-5} risk.
- bb **Xylenes.** Cleanup level based on xylene not exceeding the maximum allowed cleanup level in this table for total petroleum hydrocarbons and on prevention of adverse aesthetic characteristics. This is a total value for all xylenes.

Table 740-1
Method A Soil Cleanup Levels
for Unrestricted Land Uses.^a

Hazardous Substance	CAS Number	Cleanup Level
Arsenic	7440-38-2	20 mg/kg ^b
Benzene	71-43-2	0.03 mg/kg ^c
Benzo(a)pyrene	50-32-8	0.1 mg/kg ^d
Cadmium	7440-43-9	2 mg/kg ^e
Chromium		
Chromium VI	18540-29-9	19 mg/kg ^{f1}
Chromium III	16065-83-1	2,000 mg/kg ^{f2}
DDT	50-29-3	3 mg/kg ^g
Ethylbenzene	100-41-4	6 mg/kg ^h
Ethylene dibromide (EDB)	106-93-4	0.005 mg/kg ⁱ
Lead	7439-92-1	250 mg/kg ^j
Lindane	58-89-9	0.01 mg/kg ^k
Methylene chloride	75-09-2	0.02 mg/kg ^l
Mercury (inorganic)	7439-97-6	2 mg/kg ^m
MTBE	1634-04-4	0.1 mg/kg ⁿ
Naphthalenes	91-20-3	5 mg/kg ^o
PAHs (carcinogenic)		See benzo(a)pyrene ^d
PCB Mixtures		1 mg/kg ^p
Tetrachloroethylene	127-18-4	0.05 mg/kg ^q
Toluene	108-88-3	7 mg/kg ^r
Total Petroleum Hydrocarbons ^s		
[Note: Must also test for and meet cleanup levels for other petroleum components--see footnotes!]		
Gasoline Range Organics		
Gasoline mixtures without benzene and the total of ethyl benzene, toluene and xylene are less than 1% of the gasoline mixture		100 mg/kg
All other gasoline mixtures		30 mg/kg
Diesel Range Organics		2,000 mg/kg
Heavy Oils		2,000 mg/kg
Mineral Oil		4,000 mg/kg
1,1,1 Trichloroethane	71-55-6	2 mg/kg ^t
Trichloroethylene	79-01-6	0.03 mg/kg ^u
Xylenes	1330-20-7	9 mg/kg ^v

Footnotes:

- a Caution on misusing this table.** This table has been developed for specific purposes. It is intended to provide conservative cleanup levels for sites undergoing routine cleanup actions or for sites with relatively few hazardous substances, and the site qualifies under WAC 173-340-7491 for an exclusion from conducting a simplified or site-specific terrestrial ecological evaluation, or it can be demonstrated using a terrestrial ecological evaluation under WAC 173-340-7492 or 173-340-7493 that the values in this table are ecologically protective for the site. This table may not be appropriate for defining cleanup levels at other sites. For these reasons, the values in this table should not automatically be used to define cleanup levels that must be met for financial, real estate, insurance coverage or placement, or similar transactions or purposes. Exceedances of the values in this table do not necessarily mean the soil must be restored to these levels at a site. The level of restoration depends on the remedy selected under WAC 173-340-350 through 173-340-390.
- b Arsenic.** Cleanup level based on direct contact using Equation 740-2 and protection of ground water for drinking water use using the procedures in WAC 173-340-747(4), adjusted for natural background for soil.
- c Benzene.** Cleanup level based on protection of ground water for drinking water use, using the procedures in WAC 173-340-747(4) and (6).
- d Benzo(a)pyrene.** Cleanup level based on direct contact using Equation 740-2. If other carcinogenic PAHs are suspected of being present at the site, test for them and use this value as the total concentration that all carcinogenic PAHs must meet using the toxicity equivalency methodology in WAC 173-340-708(8).
- e Cadmium.** Cleanup level based on protection of ground water for drinking water use, using the procedures described in WAC 173-340-747(4), adjusted for the practical quantitation limit for soil.
- f1 Chromium VI.** Cleanup level based on protection of ground water for drinking water use, using the procedures described in WAC 173-340-747(4).
- f2 Chromium III.** Cleanup level based on protection of ground water for drinking water use, using the procedures described in WAC 173-340-747(4). Chromium VI must also be tested for and the cleanup level met when present at a site.
- g DDT (dichlorodiphenyltrichloroethane).** Cleanup level based on direct contact using Equation 740-2.
- h Ethylbenzene.** Cleanup level based on protection of ground water for drinking water use, using the procedures described in WAC 173-340-747(4).
- i Ethylene dibromide (1,2 dibromoethane or EDB).** Cleanup level based on protection of ground water for drinking water use, using the procedures described in WAC 173-340-747(4) and adjusted for the practical quantitation limit for soil.
- j Lead.** Cleanup level based on preventing unacceptable blood lead levels.
- k Lindane.** Cleanup level based on protection of ground water for drinking water use, using the procedures described in WAC 173-340-747(4), adjusted for the practical quantitation limit.
- l Methylene chloride (dichloromethane).** Cleanup level based on protection of ground water for drinking water use, using the procedures described in WAC 173-340-747(4).
- m Mercury.** Cleanup level based on protection of ground water for drinking water use, using the procedures described in WAC 173-340-747(4).
- n Methyl tertiary-butyl ether (MTBE).** Cleanup level based on protection of ground water for drinking water use, using the procedures described in WAC 173-340-747(4).
- o Naphthalenes.** Cleanup level based on protection of ground water for drinking water use, using the procedures described in WAC 173-340-747(4). This is a total value for naphthalene, 1-methyl naphthalene and 2-methyl naphthalene.
- p PCB Mixtures.** Cleanup level based on applicable federal law (40 C.F.R. 761.61). This is a total value for all PCBs.

- q **Tetrachloroethylene.** Cleanup level based on protection of ground water for drinking water use, using the procedures described in WAC 173-340-747(4).
- r **Toluene.** Cleanup level based on protection of ground water for drinking water use, using the procedures described in WAC 173-340-747(4).
- s **Total Petroleum Hydrocarbons (TPH).**
TPH cleanup values have been provided for the most common petroleum products encountered at contaminated sites. Where there is a mixture of products or the product composition is unknown, samples must be tested using both the NWTPH-Gx and NWTPH-Dx methods and the lowest applicable TPH cleanup level must be met.
- **Gasoline range organics** means organic compounds measured using method NWTPH-Gx. Examples are aviation and automotive gasoline. The cleanup level is based on protection of ground water for noncarcinogenic effects during drinking water use using the procedures described in WAC 173-340-747(6). Two cleanup levels are provided. The lower value of 30 mg/kg can be used at any site. When using this lower value, the soil must also be tested for and meet the benzene soil cleanup level. The higher value of 100 mg/kg can only be used if the soil is tested and found to contain no benzene and the total of ethyl benzene, toluene and xylene are less than 1% of the gasoline mixture. No interpolation between these cleanup levels is allowed. In both cases, the soil cleanup level for any other carcinogenic components of the petroleum [such as EDB and EDC], if present at the site, must also be met. Also, in both cases, soil cleanup levels for any noncarcinogenic components [such as toluene, ethylbenzene, xylenes, naphthalene, and MTBE], also must be met if these substances are found to exceed ground water cleanup levels at the site. See Table 830-1 for the minimum testing requirements for gasoline releases.
- **Diesel range organics** means organic compounds measured using method NWTPH-Dx. Examples are diesel, kerosene, and #1 and #2 heating oil. The cleanup level is based on preventing the accumulation of free product on the ground water, as described in WAC 173-340-747(10). The soil cleanup level for any carcinogenic components of the petroleum [such as benzene and PAHs], if present at the site, must also be met. Soil cleanup levels for any noncarcinogenic components [such as toluene, ethylbenzene, xylenes and naphthalenes], also must be met if these substances are found to exceed the ground water cleanup levels at the site. See Table 830-1 for the minimum testing requirements for diesel releases.
- **Heavy oils means** organic compounds measured using NWTPH-Dx. Examples are #6 fuel oil, bunker C oil, hydraulic oil and waste oil. The cleanup level is based on preventing the accumulation of free product on the ground water, as described in WAC 173-340-747(10) and assuming a product composition similar to diesel fuel. The soil cleanup level for any carcinogenic components of the petroleum [such as benzene, PAHs and PCBs], if present at the site, must also be met. Soil cleanup levels for any noncarcinogenic components [such as toluene, ethylbenzene, xylenes and naphthalenes], also must be met if found to exceed the ground water cleanup levels at the site. See Table 830-1 for the minimum testing requirements for heavy oil releases.
- **Mineral oil** means non-PCB mineral oil, typically used as an insulator and coolant in electrical devices such as transformers and capacitors, measured using NWTPH-Dx. The cleanup level is based on preventing the accumulation of free product on the ground water, as described in WAC 173-340-747(10). Sites using this cleanup level must also analyze soil samples and meet the soil cleanup level for PCBs, unless it can be demonstrated that: (1) The release originated from an electrical device that was manufactured after July 1, 1979; or (2) oil containing PCBs was never used in the equipment suspected as the source of the release; or (3) it can be documented that the oil released was recently tested and did not contain PCBs. Method B must be used for releases of oils containing greater than 50 ppm PCBs.

See Table 830-1 for the minimum testing requirements for mineral oil releases.

- t **1,1,1 Trichloroethane.** Cleanup level based on protection of ground water for drinking water use, using the procedures described in WAC 173-340-747(4).
- u **Trichloroethylene.** Cleanup level based on protection of ground water for drinking water use, using the procedures described in WAC 173-340-747(4).
- v **Xylenes.** Cleanup level based on protection of ground water for drinking water use, using the procedures described in WAC 173-340-747(4). This is a total value for all xylenes.



APPENDIX D. LABORATORY REPORT

D



Libby Environmental, Inc.

3322 South Bay Road NE • Olympia, WA 98506-2957

September 4, 2020

Jake Lee
Envitechnology, Inc.
9805 NE 116th Street, Suite 300
Kirkland, WA 98034

Dear Mr. Lee:

Please find enclosed the analytical data report for the 101 Post Station Project located in Sequim, Washington.

The results of the analyses are summarized in the attached tables. Applicable detection limits and QA/QC data are included. The sample(s) will be disposed of within 30 days unless we are contacted to arrange long term storage.

Libby Environmental, Inc. appreciates the opportunity to have provided analytical services for this project. If you have any further questions about the data report, please give me a call. It was a pleasure working with you on this project, and we are looking forward to the next opportunity to work together.

Sincerely,

Sherry L. Chilcutt
Senior Chemist
Libby Environmental, Inc.

Libby Environmental, Inc.

Chain of Custody Record

www.LibbyEnvironmental.com

3322 South Bay Road NE

Ph: 360-352-2110

Olympia, WA 98506

Fax: 360-352-4154

Date: September 1, 2020 Page: 1 of 1

Client: Envitechnology, inc

Project Manager: Jake Lee

Address: 9805 NE 116th St #300

Project Name: 101 Post Station

City: Kirkland State: WA Zip: 98034

Location: 822 E Washington St City, State: Sequim, WA

Phone: 425-890-3517 Fax: 425-310-6600

Collector: Jake Lee Date of Collection: 9/1/20

Client Project # 02200729-1

Email: jakelee@envitechnology.com



																		
Sample Number	Depth	Time	Sample Type	Container Type	VOC 8260	PCE & Daughter Prod.	NWTPH-Gx	BTEX (8260) / (8021)	NWTPH-HCID	NWTPH-Dx / Dx	PCB 8082	MTCA 5 Metals	RCRA 8 Metals	c PAH 8270	PAH 8270	Semi Vol 8270	Field Notes	
1 B1-14	14	10:30	Soil			X	X	X										
2 B2-15	15	11:00																← odor
3 B3-15	15	11:17																
4 B4-10	10	11:40																
5 B5-10	10	12:00																
6 B6-15	15	12:30	↓			↓	↓	↓										
7																		
8																		
9																		
10																		
11																		
12																		
13																		
14																		
15																		
16																		
17																		

Relinquished by: <u>Jake Lee</u>	Date / Time: <u>9/1/20 12:30</u>	Received by: <u>[Signature]</u>	Date / Time: <u>9-1-20 12:33</u>	Sample Receipt Good Condition? Y N Cooler Temp. °C Sample Temp. °C Total Number of Containers	Remarks: TAT: 24HR 48HR 5-DAY
Relinquished by: <u>[Signature]</u>	Date / Time: <u>9-1-20 3:03</u>	Received by: <u>[Signature]</u>	Date / Time: <u>9-1-20 15:03</u>		
Relinquished by: <u>[Signature]</u>	Date / Time: <u></u>	Received by: <u></u>	Date / Time: <u></u>		

LEGAL ACTION CLAUSE: In the event of default of payment and/or failure to pay, Client agrees to pay the costs of collection including court costs and reasonable attorney fees to be determined by a court of law.

Distribution: White - Lab, Yellow - Operator

Libby Environmental, Inc.

101 POST STATION PROJECT

Envitechnology, Inc.

Sequim, Washington

Libby Project # L200901-3

Client Project # 02200729-1

3322 South Bay Road NE

Olympia, WA 98506

Phone: (360) 352-2110

FAX: (360) 352-4154

Email: libbyenv@gmail.com

Analyses of Gasoline (NWTPH-Gx) & BTEX (EPA Method 8260D) in Soil

Sample Description		Method	B1-14	B1-14 Dup	B2-15	B2-15 Dup	B3-15
		Blank					
Date Sampled		N/A	9/1/2020	9/1/2020	9/1/2020	9/1/2020	9/1/2020
Date Analyzed	PQL	9/2/2020	9/2/2020	9/2/2020	9/3/2020	9/3/2020	9/2/2020
	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)
Benzene	0.02	nd	nd	nd	0.023	0.032	nd
Toluene	0.10	nd	nd	nd	nd	0.11	nd
Ethylbenzene	0.05	nd	nd	nd	1.8	3.5	nd
Total Xylenes	0.15	nd	nd	nd	8.0	18	nd
Gasoline	10	nd	nd	nd	150	190	16
Surrogate Recovery							
Dibromofluoromethane		94	83	82	74	74	78
1,2-Dichloroethane-d4		117	108	106	98	96	96
Toluene-d8		75	71	68	78	84	74
4-Bromofluorobenzene		90	97	92	104	102	90

"nd" Indicates not detected at listed detection limit.

"int" Indicates that interference prevents determination.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE : 65% TO 135%

ANALYSES PERFORMED BY: Paul Burke

Libby Environmental, Inc.

101 POST STATION PROJECT

Envitechnology, Inc.

Sequim, Washington

Libby Project # L200901-3

Client Project # 02200729-1

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Olympia, WA 98506

Phone: (360) 352-2110

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Email: libbyenv@gmail.com

Analyses of Gasoline (NWTPH-Gx) & BTEX (EPA Method 8260D) in Soil

Sample Description		B4-10	B5-10	B6-15	Method Blank
Date Sampled		9/1/2020	9/1/2020	9/1/2020	N/A
Date Analyzed	PQL	9/2/2020	9/2/2020	9/2/2020	9/3/2020
	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)
Benzene	0.02	nd	nd	nd	nd
Toluene	0.10	nd	nd	nd	nd
Ethylbenzene	0.05	nd	nd	nd	nd
Total Xylenes	0.15	nd	nd	nd	nd
Gasoline	10	19	nd	nd	nd
Surrogate Recovery					
Dibromofluoromethane		79	94	98	96
1,2-Dichloroethane-d4		98	120	124	130
Toluene-d8		82	80	78	101
4-Bromofluorobenzene		94	96	90	97

"nd" Indicates not detected at listed detection limit.

"int" Indicates that interference prevents determination.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE : 65% TO 135%

ANALYSES PERFORMED BY: Paul Burke

Libby Environmental, Inc.

101 POST STATION PROJECT

Envitechnology, Inc.

Sequim, Washington

Libby Project # L200901-3

Client Project # 02200729-1

3322 South Bay Road NE

Olympia, WA 98506

Phone: (360) 352-2110

FAX: (360) 352-4154

Email: libbyenv@gmail.com

QA/QC for BTEX (EPA Method 8260D) in Soil

Matrix Spike Sample Identification: B1-14

	Spiked Conc. (mg/kg)	MS Response (mg/kg)	MSD Response (mg/kg)	MS Recovery (%)	MSD Recovery (%)	RPD (%)	Limits Recovery (%)	Data Flag
Benzene	0.25	0.26	0.27	104	108	3.8	65-135	
Toluene	0.25	0.20	0.22	80	88	9.5	65-135	
Ethylbenzene	0.25	0.24	0.21	96	84	13.3	65-135	
Total Xylenes	0.75	0.65	0.62	87	83	4.7	65-135	
Surrogate Recovery (%)								
				MS	MSD			
Dibromofluoromethane				101	107		65-135	
1,2-Dichloroethane-d4				127	135		65-135	
Toluene-d8				93	94		65-135	
4-Bromofluorobenzene				125	110		65-135	

ACCEPTABLE RPD IS 35%

ANALYSES PERFORMED BY: Paul Burke

Laboratory Control Sample

	Spiked Conc. (mg/kg)	LCS Response (mg/kg)	LCS Recovery (%)	LCS Recovery Limits (%)	Data Flag
Benzene	0.25	0.25	100	80-120	
Toluene	0.25	0.21	84	80-120	
Ethylbenzene	0.25	0.28	112	80-120	
Total Xylenes	0.75	0.73	97	80-120	
Surrogate Recovery					
Dibromofluoromethane			89	65-135	
1,2-Dichloroethane-d4			114	65-135	
Toluene-d8			79	65-135	
4-Bromofluorobenzene			110	65-135	

ANALYSES PERFORMED BY: Paul Burke

Libby Environmental, Inc.

101 POST STATION PROJECT

Envitechnology, Inc.

Sequim, Washington

Libby Project # L200901-3

Client Project # 02200729-1

3322 South Bay Road NE

Olympia, WA 98506

Phone: (360) 352-2110

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QA/QC for BTEX (EPA Method 8260D) in Soil

Matrix Spike Sample Identification: B2-15

	Spiked Conc. (mg/kg)	MS Response (mg/kg)	MSD Response (mg/kg)	MS Recovery (%)	MSD Recovery (%)	RPD (%)	Limits Recovery (%)	Data Flag
Benzene	0.25	0.21	0.29	84	116	32.0	65-135	
Toluene	0.25	0.18	0.29	72	116	46.8	65-135	R
Ethylbenzene	0.25	0	0.30	0	120	200.0	65-135	A
Total Xylenes	0.75	0	1.18	0	157	200.0	65-135	A

Surrogate Recovery (%)	MS	MSD	
Dibromofluoromethane	80	90	65-135
1,2-Dichloroethane-d4	98	122	65-135
Toluene-d8	88	105	65-135
4-Bromofluorobenzene	107	107	65-135

"R" High relative percent difference observed.

"A" Due to high sample concentrations the amount spiked is insufficient for meaningful MS/MSD recovery data.

ACCEPTABLE RPD IS 35%

ANALYSES PERFORMED BY: Paul Burke

Laboratory Control Sample

	Spiked Conc. (mg/kg)	LCS Response (mg/kg)	LCS Recovery (%)	LCS Recovery Limits (%)	Data Flag
Benzene	0.25	0.23	92	80-120	
Toluene	0.25	0.28	112	80-120	
Ethylbenzene	0.25	0.24	96	80-120	
Total Xylenes	0.75	0.67	89	80-120	

Surrogate Recovery	
Dibromofluoromethane	86 65-135
1,2-Dichloroethane-d4	104 65-135
Toluene-d8	132 65-135
4-Bromofluorobenzene	106 65-135

ANALYSES PERFORMED BY: Paul Burke

Libby Environmental, Inc.

101 POST STATION PROJECT

Envitechnology, Inc.

Sequim, Washington

Libby Project # L200901-3

Client Project # 02200729-1

3322 South Bay Road NE

Olympia, WA 98506

Phone: (360) 352-2110

FAX: (360) 352-4154

Email: libbyenv@gmail.com

Analyses of Diesel & Oil (NWTPH-Dx/Dx Extended) in Soil

Sample Number	Date Analyzed	Surrogate Recovery (%)	Diesel (mg/kg)	Oil (mg/kg)
Method Blank	9/3/2020	109	nd	nd
Method Blank	9/4/2020	104	nd	nd
B1-14	9/3/2020	103	nd	nd
B2-15	9/3/2020	int	nd	nd
B2-15 Dup	9/3/2020	110	nd	nd
B3-15	9/3/2020	101	nd	nd
B4-10	9/3/2020	101	nd	nd
B5-10	9/4/2020	106	nd	nd
B5-10 Dup	9/4/2020	107	nd	nd
B6-15	9/4/2020	100	nd	500
Practical Quantitation Limit			50	250

"nd" Indicates not detected at the listed detection limits.

"int" Indicates that interference prevents determination.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE (2-F Biphenyl): 65% TO 135%

ANALYSES PERFORMED BY: Kory Dixon

Libby Environmental, Inc.

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Olympia, WA 98506

Phone: (360) 352-2110

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Email: libbyenv@gmail.com

101 POST STATION PROJECT

Envitechnology, Inc.

Libby Project # L200901-3

Date Received 9/1/2020

Time Received 3:03 PM

Received By SC

Sample Receipt Checklist

Chain of Custody

- | | | | |
|--------------------------------------|--|------------------------------------|----------------------------------|
| 1. Is the Chain of Custody complete? | ☒ Yes | ☐ No | |
| 2. How was the sample delivered? | ☒ Hand Delivered | ☐ Picked Up | ☐ Shipped |

Log In

- | | | | |
|---|---|--|------------------------------|
| 3. Cooler or Shipping Container is present. | ☒ Yes | ☐ No | ☐ N/A |
| 4. Cooler or Shipping Container is in good condition. | ☒ Yes | ☐ No | ☐ N/A |
| 5. Cooler or Shipping Container has Custody Seals present. | ☐ Yes | ☒ No | ☐ N/A |
| 6. Was an attempt made to cool the samples? | ☒ Yes | ☐ No | ☐ N/A |
| 7. Temperature of cooler (0°C to 8°C recommended) | <u>2.8 °C</u> | | |
| 8. Temperature of sample(s) (0°C to 8°C recommended) | <u>6.5 °C</u> | | |
| 9. Did all containers arrive in good condition (unbroken)? | ☒ Yes | ☐ No | |
| 10. Is it clear what analyses were requested? | ☒ Yes | ☐ No | |
| 11. Did container labels match Chain of Custody? | ☒ Yes | ☐ No | |
| 12. Are matrices correctly identified on Chain of Custody? | ☒ Yes | ☐ No | |
| 13. Are correct containers used for the analysis indicated? | ☒ Yes | ☐ No | |
| 14. Is there sufficient sample volume for indicated analysis? | ☒ Yes | ☐ No | |
| 15. Were all containers properly preserved per each analysis? | ☒ Yes | ☐ No | |
| 16. Were VOA vials collected correctly (no headspace)? | ☒ Yes | ☐ No | ☐ N/A |
| 17. Were all holding times able to be met? | ☒ Yes | ☐ No | |

Discrepancies/ Notes

- | | | | |
|---|------------------------------|-----------------------------|---|
| 18. Was client notified of all discrepancies? | ☐ Yes | ☐ No | ☒ N/A |
|---|------------------------------|-----------------------------|---|

Person Notified: _____

Date: _____

By Whom: _____

Via: _____

Regarding: _____

- | | |
|---------------|--------------------------------|
| 19. Comments. | <u>Vials Preserved w/ MeOH</u> |
| | _____ |
| | _____ |
| | _____ |