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August 9, 2021

Elton Lee
Ninth and Lenora LLC
455 Market Street, Suite #1810
San Francisco, CA 94105
(elee@gid.com)

Re: Opinion on Proposed Cleanup of a Property associated with a Site:

- **Site Name:** Lenora Building
- **Site Address:** 2101 9th Avenue and 2118 Westlake Avenue, Seattle, Washington 98121
- **Facility/Site No.:** 91413494
- **Cleanup Site ID No.:** 1802
- **VCP Project No.:** NW3277

Dear Elton Lee:

The Department of Ecology (Ecology) appreciates your decision to clean up the **Lenora Building** facility (Site) independently. Thank you for submitting documentation regarding your remedial cleanup strategy and assessment for preparing an Environmental Covenant (EC) for the Property for review by Ecology under the Voluntary Cleanup Program (VCP). This letter provides our opinion. We are providing this opinion under the authority of the Model Toxics Control Act (MTCA), Chapter 70(A)-305 RCW.

Issues Presented and Opinion

1. Upon completion of the proposed Property cleanup and management of the EC, will further remedial action likely be necessary to clean up contamination at the Site?

   NO. Ecology has determined that, upon completion of your proposed cleanup and recorded EC, no further remedial action will likely be necessary to clean up contamination at the Property.

2. Upon completion of the proposed cleanup, will further remedial action likely still be necessary elsewhere at the Site?

Yes, Ecology has concluded that **further remedial action** under MTCA is still necessary **elsewhere at the Site.** In other words, while your cleanup and proposed EC would constitute the final actions for the Property, they constitute only an **"interim action"** for the Site as a whole.

This opinion is based on an analysis of whether the remedial action meets the substantive requirements of MTCA, Chapter 70.105D RCW, and it's implementing regulations, Chapter 173-340 WAC (collectively "substantive requirements of MTCA"). The analysis is provided below.

Description of the Property and the Site

This opinion applies only to the Property and the Site described below. This opinion does not apply to any other sites that may affect the Property. Any such sites, if known, are identified separately below.

1. Description of the Property.

The Property includes the following tax parcels in King County, which were affected by the Site and will be addressed by your cleanup:

- 0660000540
- 0660000545

The Property includes the centerline of the right-of-way easements for two adjacent roadways: Lenora Street and 9th Avenue.

Enclosure A includes a legal description of the Property. **Enclosure B** includes a diagram of the Site that illustrates the location of the Property within the Site.

2. Description of the Site.

The Site is defined by the nature and extent of contamination associated with the following release:

- Gasoline-range petroleum hydrocarbons (TPH-G), diesel-range petroleum hydrocarbons (TPH-D), oil-range petroleum hydrocarbons (TPH-O), benzene, xylenes, lead, and carcinogenic PAHs (cPAHs) into the Soil.

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

3. Identification of Other Sites that may affect the Property.

Please note a parcel of real property can be affected by multiple sites. At this time, we have limited information that the Property is affected by another, unknown site. This opinion does not apply to the contamination determined to be present in the soil beneath a limited portion of 9th Avenue.

There is one area east of the Stratus Apartments within 9th Avenue where gasoline contaminated soil was identified during utility installation. This soil is attributable to an upgradient source, and therefore, not part of the Site (**Figure 7**).

Basis for the Opinion

This opinion is based on the information contained in the following documents:

1. GeoEngineers, Inc., *Remedial Investigation/Feasibility Study, Ninth and Lenora Redevelopment, 2101 9th Avenue, Seattle, Washington, VCP Project No. NW2980,* dated March 24, 2016.

2. GeoEngineers, Inc., *Cleanup Action Report, Ninth and Lenora Redevelopment, 2101 9th Avenue, Seattle, Washington, VCP Project No. NW2980,* dated March 24, 2016.

3. Aspect Consulting, *Cleanup Action Report, Lenora Building Site (aka Stratus Apartments), 820 Lenora Street, Seattle, Washington, VCP Project No. NW3277,* dated March 26, 2020.

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

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

Analysis of the Cleanup

1. Cleanup of the Property located within the Site.

Ecology has concluded that, upon completion of your proposed cleanup in conjunction

[1] https://apps.ecology.wa.gov/gsp/Sitepage.aspx?csid=1802
[2] https://ecology.wa.gov/About-us/Accountability-transparency/Public-records-requests

with a recorded Environmental Covenant (EC), **no further remedial action** will likely be necessary at the Property to clean up contamination associated with the Site. That conclusion is based on the following analysis:

Based on review of the supporting documentation listed above, Ecology has determined that MTCA Method A soil and groundwater cleanup levels and MTCA Method B sub-slab soil vapor screening levels and indoor air cleanup levels are appropriate.

a. Characterization of the Site.

Ecology has determined your characterization of the Site is sufficient to establish cleanup standards for the Site and select a cleanup for the Property. The Site is described above and in **Enclosure B**.

Your characterization of the Property, presented in the 2020 Cleanup Action Report (CAR), determined that impacts to soil, perched groundwater and soil gas beneath the Property occurred as a result of releases from prior on-Site tenant activities and underground storage tanks (USTs).

Ecology requires that the impacted areas that comprises the Site, both on- and off-Property, and all media of concern, be fully characterized. Complete Site characterization is a necessary prerequisite for determining an appropriate cleanup action and cleanup standards for the Site. Ecology requires current, representative data in order to evaluate Site conditions and make a determination as to the appropriateness and adequacy of cleanup actions.

Changes to the Property boundaries on the east side to include the centerline of the 9th Avenue ROW and south side to include the centerline of the Lenora Street ROW initiated this new VCP application and Cleanup Action Report submittal in 2020.

A limited volume of weathered petroleum (gasoline-and heavy oil-range hydrocarbons) and PAH-contaminated soil remains in two small areas; the first extending within the south property boundary at depth under Lenora Street and the second extending beyond the west subject property beneath the alley. Since the centerline of the Lenora Street ROW is now part of the adjusted Property boundaries, a Property NFA and EC for the Lenora Building VCP Project (NW3277) is now under consideration.

b. Establishment of cleanup standards for the Site.

Ecology has determined the cleanup levels and points of compliance you established for the Site meet the substantive requirements of MTCA.
All contaminated soil associated with the releases were removed from the Property, and

the shallow groundwater was fully removed throughout the Property boundary upon completion of the building construction and redevelopment.

Soil

Cleanup Levels

The Site is located in a mixed residential and commercial area. The Site does not meet the MTCA definition of an industrial property; therefore, soil cleanup levels suitable for unrestricted land use are appropriate. For unrestricted land use, through protection of direct contact, and protection of leaching to groundwater, either Method A or Method B cleanup levels can be used for the contaminants of concern. MTCA Method A cleanup levels were selected for TPH-G, TPH-D, TPH-O, benzene, xylenes, lead, and carcinogenic PAHs (cPAHs).

The following potential exposure/risk pathways were appropriate to consider:

- Human health protection from direct soil contact pathway exposure
- Human health protection from soil-to-air pathway exposure
- Terrestrial ecological protection

Soil cleanup levels protective of terrestrial ecological receptors are not necessary because the Site meets the initial Terrestrial Ecological Evaluation exclusion criteria (WAC 173-340-7481 (1)(c)(i)). There are less than 1.5 acres of contiguous undeveloped land on or within 500 feet of any area of the Site.

Point of Compliance:

For soil cleanup levels based on the protection of direct contact, and based on the protection of ground water, the point of compliance is defined as Site wide throughout the soil profile and may extend below the water table. This is the appropriate point of compliance for the Site.

Groundwater

Cleanup Levels:

Appropriate groundwater cleanup levels are the WAC 173-340 Method A Table 720-1 values. Information was gathered during a 2015 subsurface assessment order to verify current Site conditions and to evaluate the soil to groundwater pathway. The investigation in 2016 explored for Site groundwater to a maximum depth of 55 feet below the ground surface (bgs) and confirmed that the soil to groundwater pathway was not complete. The data indicate that a contaminant migration pathway to groundwater is not present at this Site.

c. Selection of cleanup for the Property.

The selected cleanup action must meet applicable minimum requirements for cleanup actions stipulated in WAC 173-340-360: protect human health and the environment, comply with cleanup standards, use permanent solutions, and provide for reasonable restoration time frames.

Ecology has determined the cleanup action you selected for the Property meets the substantive requirements of MTCA. The cleanup meets minimum cleanup requirements and does not exacerbate conditions or preclude reasonable cleanup alternatives elsewhere at the Site.

The selected cleanup consisted of the excavation and removal of approximately 14,550 tons of petroleum-contaminated soil (contaminated with the contaminants of concern (COCs) TPH-G, PAHs, benzene, xylenes, and lead), and which were transported off-Site to a regulated facility. The cleanup also consisted of the removal of a previously closed-in-place petroleum UST with fill ports and piping; a hydraulically operated steel elevator shaft and a concrete vault; and an undocumented heating oil tank. Confirmation soil samples confirmed that all petroleum-contaminated (PCS) was excavated and removed from the heating oil tank location.

Specifically:

- Excavation and removal of approximately 14,550 tons of petroleum-contaminated soil which were transported off-Site to the Waste Management (WM) transfer station in Seattle for rail haul and permitted disposal at the WM subtitle D landfill in Arlington, Oregon.

- The lateral and vertical extent of petroleum-impacted soil was adequately defined upon the completion of Site investigation, cleanup action, and confirmation soil sampling. Soil analytical results of confirmation samples were below MTCA Method A cleanup levels for the contaminants of concern. Groundwater (perched or regional) was not encountered during mass excavation associated with redevelopment of the Property.

- A hydraulically-operated steel elevator shaft and a concrete vault that housed a hydraulic hoist were removed during Property redevelopment and construction between June and August 2015. Confirmation samples confirmed that soil below the former elevator shaft and vault was not impacted.

- A gasoline UST (UST#1) was removed from the Property in 2002. A closed-in-place steel diesel tank (UST #2), along with associated piping and petroleum-contaminated soil were removed from the south portion of the Property.

Confirmation soil samples confirmed that all petroleum-contaminated soil was excavated and removed from within the Property boundaries.

- An undocumented heating oil tank (UST #3) was discovered during Property redevelopment and construction. The UST was excavated and removed along with petroleum-contaminated soil between June and August 2015. Confirmation soil samples confirmed that all petroleum-contaminated soil was excavated and removed from the former UST #3 location.

- Based on confirmation soil sampling data, residual contaminated soil remains capped in-place in two areas now determined to be within the Property boundaries. Details for each location includes:

  - 9th Avenue: Residual gasoline-range hydrocarbons and benzene-contaminated soil is present in an area measuring approximately 20 feet long (north-south) by 10 feet wide (east-west) and 9-feet thick (between approximate depths of 15 feet bgs and 24 feet bgs (elevations 72 feet and 63 feet amsl) (**Figures 8 and 9**). Note that the 9th Avenue surface elevation is 87 feet amsl.

  - Lenora Street: Residual gasoline- and heavy oil-range hydrocarbons, toluene- and PAH-contaminated soil is present in an area measuring approximately 40 feet long (east-west) by 8 feet wide (north-south) and 8- feet thick (between approximate depths of 24 feet bgs and 36 feet bgs (corresponding approximate Elevations 63 and 55 amsl) (**Figures 8 and 9**). Note that the Lenora Street surface elevation is 87 feet amsl.

  - Residual petroleum-contaminated soil (exceeding MTCA Method A cleanup levels) remains in place outside the west Property boundary in a limited portion of an alley owned by the City of Seattle. Alley details: Residual heavy oil-range hydrocarbons and PAH-contaminated soil is present in an area measuring approximately 60 feet long (north-south) by 10 feet wide (east-west) and 8-feet thick (between approximate depths of 6 feet bgs and 14 feet bgs [corresponding elevation 63 to 55 feet amsl] (**Figures 8 and 9**). Note that the alley surface elevation is 69 feet amsl.

  - Regional groundwater was determined to be 53 to 55 feet bgs (elevation 14 to 16 feet above mean sea level (msl)) based on the results of groundwater monitoring well MWG-1 which was installed prior to Property redevelopment and construction activities. Groundwater was determined to be uncontaminated above COC MTCA Method A cleanup levels based on the analytical results of groundwater samples collected from on-Property monitoring well MWG-1 and from on off-Property monitoring well MW-5 which was screened from 42 to 58 feet below the ground surface (bgs) **(Figure 11).** These well locations are considered representative of

groundwater on the Site. Perched groundwater was encountered in localized, discontinuous locations during subsurface explorations, but was not encountered during excavation related to mass construction of the Property.

Based on the estimated depth of regional groundwater, the estimated extent of vertical separation (greater than 40 feet) between contaminated fill soil and regional groundwater and groundwater sampling data, the soil to groundwater pathway for contaminant migration is most likely incomplete. The potential source of contaminated shallow ground water (the petroleum-contaminated soil) was excavated and removed from the Property; regional groundwater is not contaminated.

- Per Ecology's 2019 request, a post-cleanup assessment was conducted to evaluate the potential risk for VI in the newly constructed Stratus Apartments building relative to the residual petroleum- and PAH-contaminated soil remaining on the Site.

  The soil vapor to inhalation pathway is considered incomplete under current conditions at the Site because:

  - The nature and extent, as well as the concentrations of residual petroleum- and PAH-contaminated soil impacts pose a low risk for VI. In addition, the construction of the Stratus building which includes underground parking with an HVAC ventilation system adequately mitigates any potential VI pathway.

  - There are no volatile compounds in groundwater, and no groundwater impacts are in contact with the building foundation.

  - The Site has not changed relative to the soil, perched water, and groundwater quality, geological and hydrogeological conditions, and location, nature, and extent of residual petroleum- and PAHs-contaminated soil. The alteration is the clarification of the east and south boundaries of the Property (which extends to the centerline of 9th Avenue and the centerline of Lenora Street respectively).

These actions meet the minimum requirements in WAC 173-340-360(2) because they are protective of human health and the environment, comply with the selected cleanup standards, comply with applicable state and federal laws and provide for compliance monitoring. The selected cleanup action used permanent solutions to the maximum extent practicable (source removal and off-Site disposal) and provided a reasonable restoration time frame.

2. Cleanup of the Site as a whole.

Ecology has concluded that **further remedial action** will still be necessary elsewhere at the Site upon completion of your proposed cleanup. In other words, while your proposed cleanup may constitute the final action for the Property, it will constitute only an **"interim action"** for the Site as a whole.

In order for Ecology to issue a No Further Action determination for this VCP Project, placement of an Environmental Covenant on the Property will be necessary due to the following:

Documentation has been provided which specifies that the east and south boundaries of the Property (which extends to the centerline of 9th Avenue and the centerline of Lenora Street) are confirmed to have a limited volume of petroleum- and PAH-contaminated soil.

The residual petroleum- and PAHs-contaminated soil located outside the footprint of the 42-story residential Stratus Apartments building, in the 9th Avenue and Lenora Street (within the Property), and in the alley (outside the Property) which is owned by the Seattle Parks Department, are inaccessible and cannot be excavated due to the presence of structural impediments. The residual petroleum- and PAH-contaminated soil in these three areas remains capped beneath asphalt pavements that serve to prevent direct contact. In-situ treatment of soil was evaluated and found to be neither technically feasible nor cost effective for heavy oil-range petroleum hydrocarbons and PAHs in the vadose zone above the water table.

- Lenora Street: Soil contaminated with TPH-G, TPH-D, TPH-O, benzene, xylenes, lead, and cPAHs above MTCA Method A is located approximately 24 feet bgs (under the street). Several utility corridors are present in Lenora Street that precluded further investigation.
- Alley: Utilities and additional infrastructure elements (concrete footings and walls) are present in the alley.
- In a regional aquifer underlying the Site, groundwater occurs at 53 to 55 feet bgs; (near elevations 14 to 16 feet above msl).
- Lenora Street and the alley are currently capped with asphalt so there is some control of surface water and the infiltration of precipitation.

Environmental Covenant Requirements:

A Draft EC must be prepared and submitted to Ecology for Ecology's consideration of a final NFA opinion for the Property.

The EC on the Property will be required for a No Further Action (NFA) determination to assure selected cleanup actions remain protective of human health and the environment.

The EC must include an operation and maintenance (O&M) plan exhibit, and for the building, a foundation inspection checklist, as well as the results of the vapor intrusion assessment. Annual report submittals will be required. A contingency plan outline will also be an exhibit to the EC. The EC text will present that all practicable measures to clean up contamination on the Property have been implemented.

Also, if the current building is remodeled in any manner that could change vapor intrusion conditions, or if the garage HVAC system is altered, an updated vapor intrusion assessment must be conducted.

Information on how to prepare an Environmental Covenant can be found in the Uniform Environmental Covenants Act (UECA), Chapter 64.70 RCW, and WAC 173-340-440 of the Model Toxics Cleanup Act (MTCA) Cleanup Regulation).

Draft the covenant using the boilerplate document available on the VCP web site (https://fortress.wa.gov/ecy/publications/SummaryPages/1509054.html). Please note that any changes to the boilerplate language in the covenant must be approved by the Attorney General's Office.

The Draft EC document needs to contain the following exhibits:

- Legal Description
- Title Search documentation
- Appropriate Site Figures
- Site Map with GPS Coordinates of the contaminated area 4 corners of the area)
- Subordination Agreements
- O& M Plan with building foundation inspection requirements
- Annual report timeline
- Contingency Plan Outline

For your information, before Ecology can issue a final opinion concerning the Site, the draft EC must have the following completed:

1. Conduct a title search to identify all persons holding a prior interest in the real property subject to the covenant. Generally, Ecology will not sign the EC unless all prior interest holders are willing to sign on as grantors or subordinate their interests.

2. Submit the draft covenant for review and comment to the appropriate land use planning authority in your jurisdiction. When requesting such review, please do the following:
   - Send me a copy of your written request.
   - Provide the authority with my contact information.
   - Request that the authority send me a copy of any written response.

Ecology will not approve the covenant unless the authority has been adequately consulted. Upon completing your consultations with the local land use planning authority, you would then submit to Ecology any comments provided by the planning authority or, if none were provided, documentation of your consultation.

3. Upon completing your consultations with the local land use planning authority, and submittal of any comments provided by the planning authority, Ecology will review and consider the draft EC. Please have the land use authority provide an email, or letter summarizing their review.

4. Upon completion of any Ecology edits or changes, obtain the signatures of all grantors of the EC and obtain subordination agreements with any persons holding a prior interest in the real property subject to the covenant who are not signing the covenant as a grantor.

5. Upon obtaining the signatures of the grantors and any necessary subordination agreements, submit the EC to Ecology for its signature as the grantee.

6. Please note as stipulated by Chapter 65.04 RCW:

   - Property owners are the first signatory to the Environmental Covenant (EC)
   - The EC then is delivered to Ecology for management signature
   - The EC then goes back to King County to record (after adequate consultation with County)
   - Upon recording, return the signed and recorded covenant to Ecology (original paperwork) and provide a copy of the recorded covenant to the following persons:

     - Each person that signed the covenant.
     - Each person holding a recorded interest in the real property subject to the covenant.
     - Each person in possession of the real property subject to the covenant at the time the covenant is executed.
     - Each municipality or other unit of local government in which real property subject to the covenant is located.
     - Any other persons Ecology requires.

   - The copy must be legible and the recording number must be evident.

The March 2020 Cleanup Action Report is in need of editing and updating prior to completion of a final EC document. For example, the DCA section references the 2016 RI/FS. The complete analysis needs to be included in the final CAR with appropriate bar charts and tables.

Electronic submittal of all sampling data into Ecology's electronic *Environmental Information Management* (EIM) database is a requirement in order to receive a final Ecology opinion for this Site. Note that all data must be uploaded into the Ecology EIM system upon submission of each report to Ecology. This allows the Ecology Site Manager to access data to check results or perform additional analyses with those data. Gaylen Sinclair (email gaylen.sinclair@ecy.wa.gov, or via telephone at 360-407-6496) is Ecology's contact and resource on entering data into EIM. For questions regarding EIM, please see the Ecology web page: https://ecology.wa.gov/Research-Data/Data-resources/Environmental-Information-Management-database.

Decommissioning of Site Resource Protection Wells

When resource protection wells associated with the Site are no longer to be used for their intended purposes, these wells must be decommissioned in accordance with Chapter 173-160 WAC, Minimum Standards for Construction and Maintenance of Wells: WAC 173-160-460 (http://apps.leg.wa.gov/wac/default.aspx?cite=173-160-460). Per WAC 173-160-410 (http://apps.leg.wa.gov/wac/default.aspx?cite=173-160-410), resource protection wells include monitoring wells, observation wells, piezometers, spill response wells, remediation wells, environmental investigation wells, vapor extraction wells, ground source heat pump boring, grounding wells, and instrumentation wells.

Appendix C of the March 2020 Cleanup Action Report provides well decommissioning documents for wells G-1 and MW-01. The well monuments were left in place after decommissioning.

Limitations of the Opinion

1. Opinion does not settle liability with the state.

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

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

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

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

To recover remedial action costs from other liable persons under MTCA, one must demonstrate that the action is the substantial equivalent of an Ecology-conducted or

Ecology-supervised action. This opinion does not determine whether the action you performed is substantially equivalent. Courts make that determination. *See* RCW 70.105D.080 and WAC 173-340-545.

3. Opinion is limited to proposed cleanup.

This letter does not provide an opinion on whether further remedial action will actually be necessary at the Property upon completion of your proposed cleanup. To obtain such an opinion, you must submit a report to Ecology upon completion of your cleanup and request an opinion under the VCP.

4. State is immune from liability.

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

Contact Information

Thank you for choosing to clean up the Site under the Voluntary Cleanup Program (VCP). Ecology appreciates your initiative in conducting independent remedial action and requesting technical consultation under the VCP. As the cleanup of the Site progresses, you may request additional consultative services under the VCP, including assistance in identifying applicable regulatory requirements and opinions regarding whether remedial actions proposed for or conducted at the Site meet those requirements.

For more information about the VCP and the cleanup process, please visit our web site: https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Cleanup-process/Cleanup-options/Voluntary-cleanup-program. If you have any questions regarding this opinion, please feel free to contact me by phone at (425) 495-5436, or email me at glynis.carrosino@ecy.wa.gov.

Sincerely,

Glynis A. Carrosino, Project Manager
Toxics Cleanup Program, NWRO

Enclosures (1): A – Legal Description of the Property
B – Description and Diagrams of the Site

cc: Fasih Khan, Aspect Consulting LLC, (fkhan@aspectconsulting.com)
Dave Cook, Aspect Consulting LLC, (dcook@aspectconsulting.com)
Sonia Fernandez, VCP Coordinator, Ecology, (sonia.fernandez@ecy.wa.gov)

Enclosure A

Legal Description of the Property

BELL HEIRS OF S A 2ND ADD E OF WESTLAKE BLVD
Plat Block 24
Plat Lot 10

BELL HEIRS of S A 2nd ADD

Enclosure B

Description and Diagrams of the Site (including the Property)

Site Description

This section provides Ecology's understanding and interpretation of Site conditions, and is the basis for the opinions expressed in the body of the letter.

Site: The Site is defined by the release of gasoline-range (TPH-G), diesel-range petroleum hydrocarbons (TPH-D), oil-range petroleum hydrocarbons (TPH-O), benzene, xylenes, lead, and carcinogenic PAHs (cPAHs) to soil at 2101 9th Avenue, in Seattle, Washington (Property). The Site is associated with historical boiler and furnace/heating systems of the former property buildings, Underground Storage Tanks (USTs), and historic Property uses.

Area and Property Description: The Property consists of two King County tax parcels encompassing approximately 0.49 acres. The north parcel is King County Parcel # 0660000540, and the south parcel is King County Parcel #0660000545. The Property boundaries legally extends to the centerline of the 9th Avenue right-of-way (ROW) and to the centerline of the Lenora Street ROW. The Property does not include the adjacent alley right-of-way located south and west of the Lenora Building Property.

The Property is located in the Denny Triangle neighborhood and bounded to the north by retail properties, 9th Avenue to the east, Lenora Street to the south, and a public alley to the west in downtown Seattle, Washington. The Property is currently developed with a 42-story residential tower (Stratus Apartments) with ground level retail and six levels of subgrade parking. Land use surrounding the Site includes commercial businesses, residential apartments and condominiums.

The Property was enrolled in Ecology's Voluntary Cleanup Program (VCP) in 2015 (Facility/Site No. 91413494, Cleanup Site ID: 1802, and VCP Project No. NW2980). A Remedial Investigation/Feasibility Study (RI/FS) and Cleanup Action Report (CAR) was prepared and submitted to Ecology in 2016. Subsequently, Ecology issued a Property-specific No Further Action (NFA) determination in November 2017 based on the information presented in the 2016 RI/FS and the 2016 CAR. In 2018, it was discovered that the Property boundaries legally extended to the centerline of the adjacent roadways, which had implications for the Property-specific NFA that Ecology issued in 2017. This 2020 Cleanup Action Report (CAR) supersedes the 2016 CAR and presents updated information. The Site was re-enrolled into the Voluntary Cleanup Program (VCP). The objective of this 2020 CAR is to obtain a Property-Specific NFA for the correctly defined Property through Ecology's VCP.

Property History and Current Use: Early use of the Property was as a wood yard, printing facility, metal shop and a vehicle servicing/auto restoration garage. Additional historic facilities were identified including: a former boiler room, chimney and furnace systems, former car wash area, printing facility and metalwork shops. USTs located on the Property consisted of one former petroleum UST, (which was removed in 2002), one closed-in-place petroleum UST with fill ports and piping, and a heating oil UST.

Based on the historic fire insurance (Sanborn) maps, the north parcel (Parcel #0660000540) was undeveloped in 1905. A small structure and parking were present on the parcel in 1936. Later, a single-story office building with a basement was constructed between 1946 and 1948 and was used by a vehicle company for car sales, storage and repair. A boiler house was also present on the parcel and the building was heated by hot water and an oil burner. In 1980, an underground tunnel was constructed in order to provide access to the basement of the single-story building from the underground parking garage located on parcel #0660000485. Westlake Chevrolet Company owned the north parcel from 1946 until the mid-1980s (for car sales and possibly auto repair).

The parcel was occupied by a used car sales office until 1990s and the prior owner indicated that fill from an unknown source may have been brought to the parcels during the construction of the building.

Based on the historic fire insurance (Sanborn) maps and tax assessment records, the south Parcel (Parcel # 0660000545) was undeveloped from at least 1893 until approximately 1905 when a "wood yard" was located on the parcel. This parcel was owned by a lumber company from 1905 to 1924. A two-story office/retail building on the parcel was constructed in 1924 as a garage. The building was originally heated by an oil burner. The parcel was used as an auto repair facility between the 1940s and the 1970s. Later, the parcel was used as a printing facility during the 1980s and 1990s, and included a camera area, dark room and bindery area. A metal shop is shown in the west corner of the basement in 1998 building plans. Cornish College of Arts then owned the parcel until 2003.

The north parcel was the former location of an Enterprise car rental company facility. The south parcel was the former location of a two-story office/warehouse building with a garage below.

In 2018, it was discovered that the Property boundaries legally extended to the centerline of the adjacent roadways, which had implications for the property-specific NFA that Ecology issued in 2017. The 2017 NFA will remain in effect until the EC is negotiated and finalized.

The current use of the Property is a 42-story residential apartment tower with six levels of underground parking.

Contaminant Source and History: Sources of contamination include historical boiler and furnace/chimney systems of the former property buildings, USTs (UST#1 was removed in 2002; UST#2 with associated piping was closed in place; and UST#3 was a previously undocumented heating oil tank), and historic property uses such as a wood yard, printing facility, metal shops, and former vehicle servicing/washing/restoration facility, and undocumented fill that was imported to the Property. Because of the sloping nature of the Site from 9th Avenue down to the alley at the west side of the Property, the construction excavation extended from starting elevations of about 87 feet above mean sea level (msl) (high side near 9th Avenue) to 69 feet above msl (low side near the alley) to a bottom construction excavation of about elevation 7 feet

above msl. Soil contaminated with diesel and oil occurred within the upper 20 feet of fill soil at the Property.

The construction excavation at the Property extended from a starting surface elevation of approximately 87 feet above mean sea level (amsl) at the highest side of the Property near 9th Avenue and Lenora Street down to a bottom construction excavation elevation of about 7 feet amsl. 14,550 tons of contaminated soil (generally located in the upper 20 feet) was excavated from the Property and disposed of at the Subtitle D landfill in Arlington, Oregon. Shallow perched groundwater was fully removed throughout the Property boundary upon completion of the remedial excavation conducted as part of the redevelopment. Low permeability glacially-consolidated vadose zone soil (approximate thickness 39 feet) that is uncontaminated separates the residual petroleum- and PAHs-contaminated soil from the deeper regional groundwater beneath the Site.

Physiographic Setting: The Property is located within the Puget Lowland physiographic province, a broad, low-lying region situated between the Cascade Range to the east and the Olympic Mountains to the west. The Property grades drop about 10 feet from southeast to northwest. The alley along the west side of the Property historically provided access to the lowest level of the former building and slopes down near Westlake Avenue to the entrance of the former 2101 9th Avenue building. The alley does not extend through to Lenora Street. A permanent slope currently exists between the end of the alley and Lenora Street.

Surface/Storm Water System: Lake Union is located approximately 3,000 feet north of the Property. Elliott Bay is located approximately 3,000 feet southwest of the Property.

Ecological Setting: The Property is covered with a building (exterior is completed). Land surrounding the Site is primarily covered with buildings, asphalt and concrete with small landscaped areas.

Geology: The Property is underlain by relatively shallow fill overlying recent deposits and competent glacially consolidated soils. Fill generally consists of loose to medium dense silty sand with variable gravel and cobble content and occasional brick, charcoal or wood debris. Based on historical research, the block is located on the eastern edge of the 1928 to 1930 Denny Regrade, and portions of this area are reported to have up to 25 feet of fill added as part of the historical regrading process. The thickness of fill encountered in the explorations completed at the Site ranged from approximately 6 to 15 feet.

The recent deposits consist of soft to hard silt and clay with occasional sand interbeds and variable gravel content or medium dense to dense sand with variable silt and gravel content. The glacially consolidated soils encountered below the fill and recent deposits were till deposits, which consist of very dense silty sand.

Groundwater: Perched groundwater was encountered intermittently in some of the Site characterization explorations completed during remedial investigations. No perched water was

encountered within the mass excavation limits at the Property. The static groundwater level associated with the regional aquifer was measured in former monitoring well MWG-1 in 2013 and 2014. The measured depths ranged from approximately 53.30 to 55.39 feet bgs (approximate elevations 16 and 14 feet above msl) respectively, at the MWG-1 location. **(Figure 3).**

Water Supply: Seattle Public Utilities (SPU) provides drinking water to the building. The Cedar and the South Fork Tolt River Watersheds in eastern King County are the two sources for potable water supplied by SPU.

Release and Extent of Soil and Groundwater Contamination:
Petroleum hydrocarbons (TPH-G, TPH-D, and TPH-O), Benzene, Xylenes, Lead, and cPAHs were present in soil at the Property. Confirmation soil samples demonstrated that all identified soil contaminated above MTCA Method A cleanup levels was removed from the Property, and that a limited volume of contaminated soil exceeding MTCA Method A cleanup levels remain in two small areas beneath 9th Avenue and Lenora Street. The contaminated soil is located approximately 15 feet deep beneath the 9th Avenue surface and 24 feet deep beneath the Lenora Street surface, w

Based on confirmation soil sampling data, residual petroleum-and PAH-contaminated soil exceeding MTCA Method A cleanup levels remains capped in-place under hard pavements in three separate, localized areas:

(1) 9th Avenue (within the Subject Property),
(2) Lenora Street (within the Subject Property), and
(3) The alley (outside the Subject Property) owned by City of Seattle Department of Parks and Recreation **(Figure 7).**

The contaminated soil in these areas is inaccessible and cannot be excavated due to the presence of structural impediments.

During remedial excavation activities, shallow groundwater was encountered at depths of 18 to 18.5 feet bgs, was intermittent and did not yield significant quantities of recoverable water. This perched groundwater, which did not constitute a continuous water-bearing zone, was fully removed throughout the Property upon completion of the excavation during redevelopment. Based on soil borings, the depth of the regional groundwater on the Property is approximately 55 to 75 feet bgs.

Groundwater samples obtained and tested from a former on-Property monitoring well (G-1) and an off-Property well (MW-5), screened within the regional aquifer showed no petroleum impacts and metals were detected at concentrations below MTCA Method A cleanup levels.

Site Diagrams

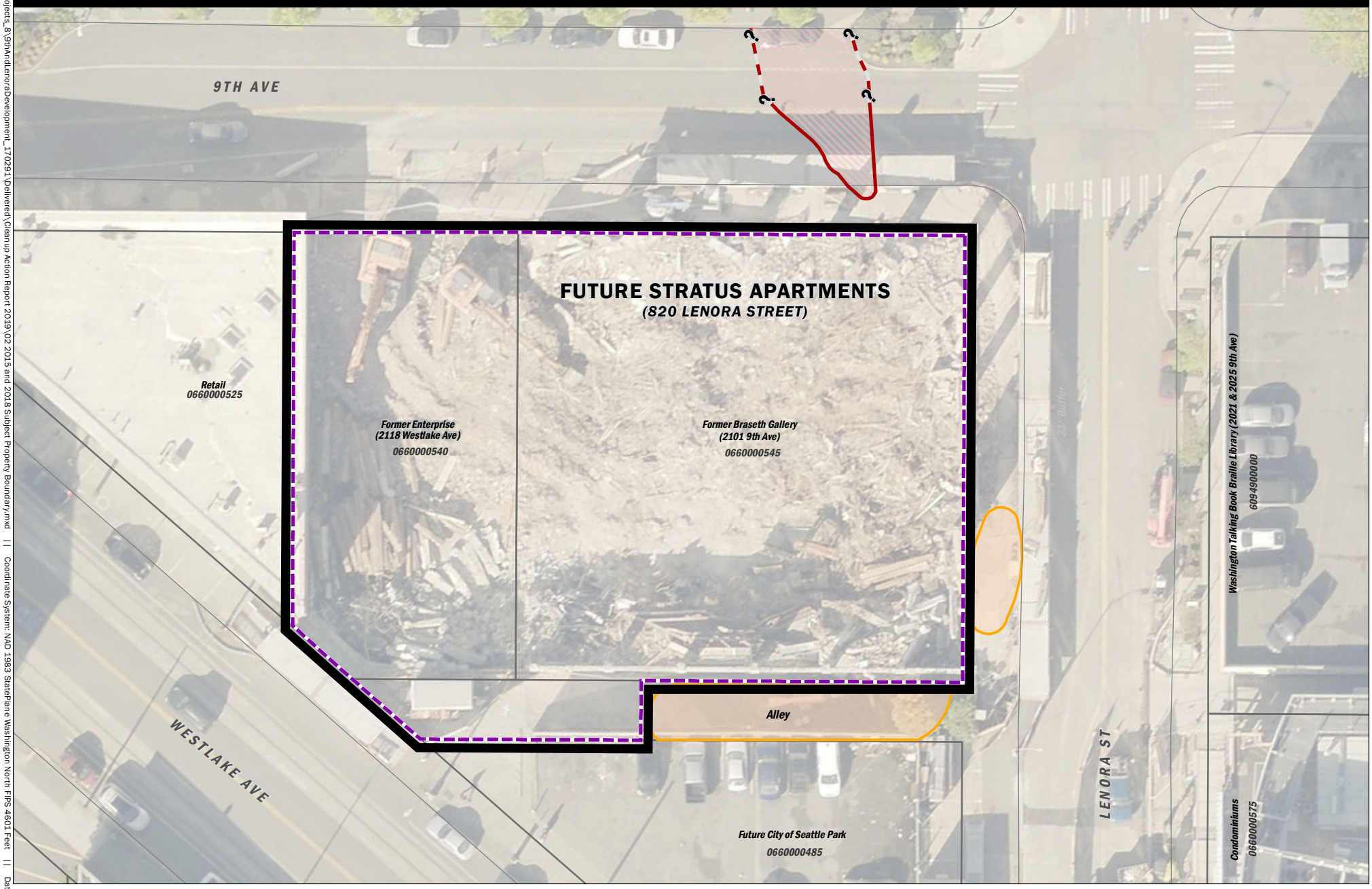
Vicinity Map

Cleanup Action Report
820 Lenora Street
Seattle, Washington

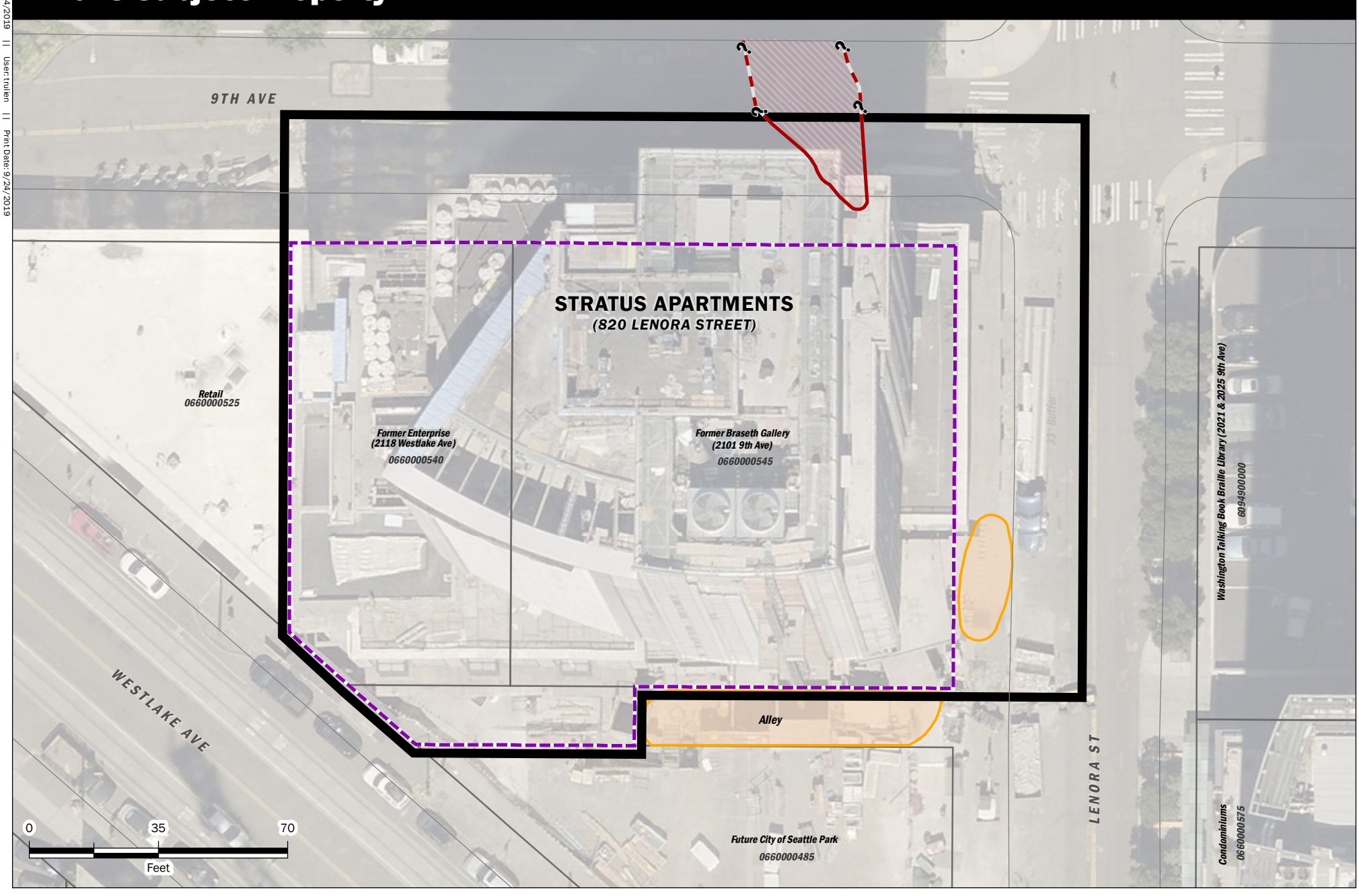
Aspect CONSULTING	SEP-2019	BY: FK / TDR	FIGURE NO. 1
	PROJECT NO. 170291	REVISED BY: ---	

GIS Path: T:\projects_8\19thAndLenoraDevelopment_170291\Delivered\Cleanup Action Report 2019\01 Vicinity Map.mxd || Coordinate System: NAD 1983 StatePlane Washington North FIPS 4601 Feet || Date Saved: 9/24/2019 || User: trullen || Print Date: 9/24/2019

2015 Subject Property



2018 Subject Property



Mass excavation limits

Approximate known extent of residual PAHs and/or petroleum-contaminated soil with MTCA exceedance

Interpreted extent of gasoline and benzene contaminated soil with MTCA exceedance at Subject Property from an off property source

Subject Property

King County Parcel

0660000545 Parcel Number

MTCA: Model Toxics Cleanup Control Act
PAH: Polycyclic aromatic hydrocarbons

2015 and 2018 Subject Property Boundary

Cleanup Action Report
820 Lenora Street
Seattle, Washington

Aspect Consulting	SEP-2019	BY: FK / KES	FIGURE NO. 2
	PROJECT NO. 170291	REVISED BY: TDR	

Basemap Layer Credits || Pictometry International Corp., Pictometry, King County

GIS Path: T:\projects_8\9thAndLenoraDevelopment_170291\Delivered\Cleanup Action Report 2019\02 2015 and 2018 Subject Property Boundary.mxd || Coordinate System: NAD 1983 StatePlane Washington North FIPS 4601 Feet || Date Saved: 9/24/2019 || User: trulen || Print Date: 9/24/2019

Whole Foods

8729740000

Condominiums

Social Security Administration (901 Lenora St)
0660001310

9TH AVE

Utility Excavation for Deep Sewer

STRATUS APARTMENTS
(820 LENORA STREET)

MW-1

G-1

Retail
0660000525

Former Enterprise
(2118 Westlake Ave)
0660000540

Former Braseth Gallery
(2101 9th Ave)
0660000545

Former UST 2

MW-5

Alley

Washington Talking Book Braille Library (2021 & 2025 9th Ave)
6094900000

WESTLAKE AVE

LENORA ST

Future City of Seattle Park
0660000485

Condominiums
0660000575

Retail
0660000500

0 30 60
Feet

Note:

1. The Subject Property boundary is based on the Plat Map of the Second Addition to the Town of Seattle. The Plat Map was filed for record on December 14, 1875 and can be obtained from King County Records Office or a title company.
2. Soil conditions in mass excavation limits sourced from GeoEngineers, 2016.

Zone 1: Area of impacted fill to an approximate depth of 10 feet bgs (Elev. 60)

Zone 2: Estimated extent of contaminated fill to an approximate depth of 6 feet bgs (Elev. 63)

Zone 3: Estimated extent of contaminated fill to an approximated depth of 18 feet bgs (Elev. 51)

Former Monitoring Well

Mass excavation limits

Subject Property

King County Parcel

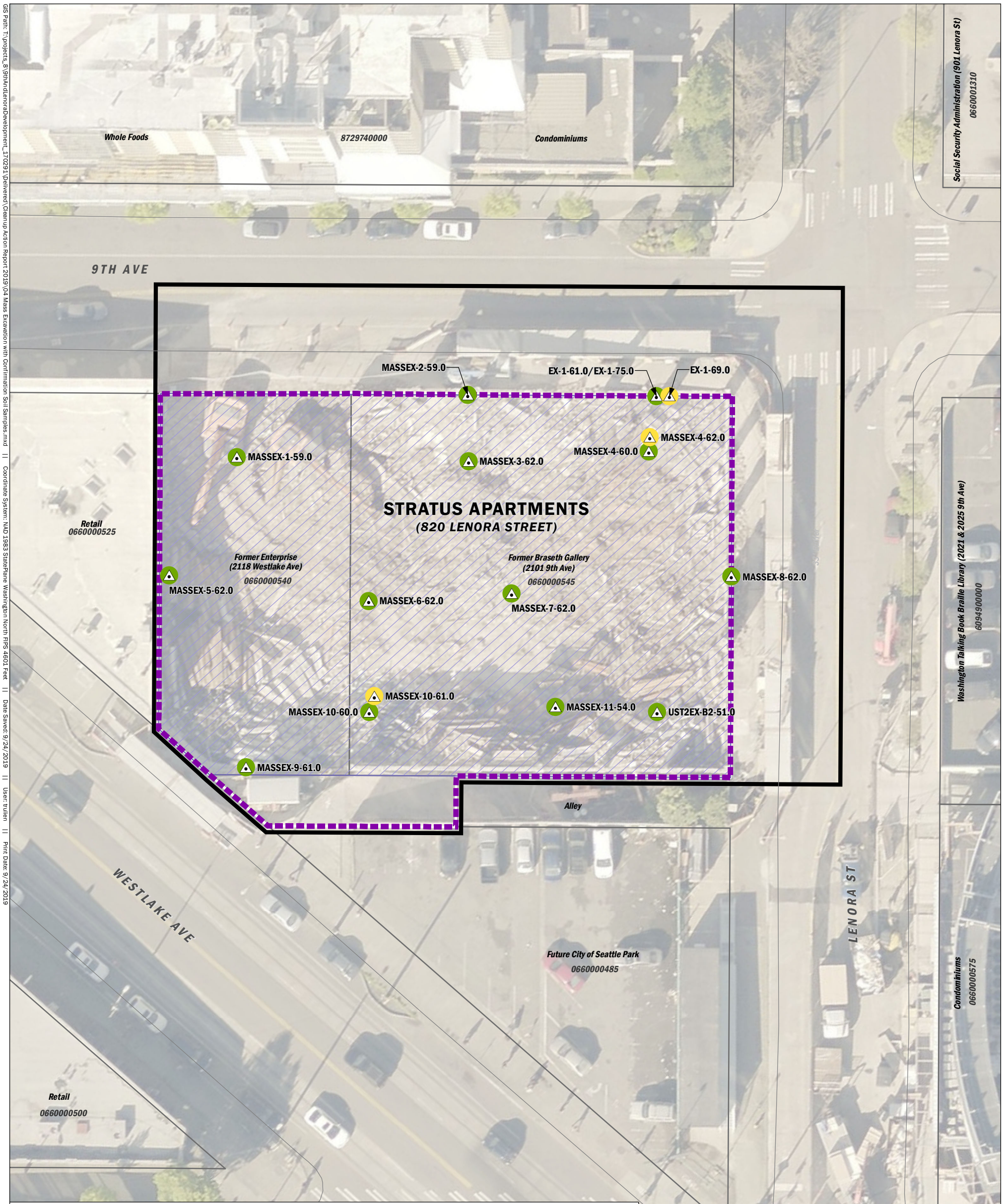
0660000545 Parcel Number

bgs: Below ground surface
UST: Underground Storage Tank

Pre-Cleanup Soil Conditions in Mass Excavation Limits

Cleanup Action Report
820 Lenora Street
Seattle, Washington

Aspect Consulting	SEP-2019	BY: FK / KES	FIGURE NO. 3
	PROJECT NO. 170291	REVISED BY: TDR	



Note:

1. The Subject Property boundary is based on the Plat Map of the Second Addition to the Town of Seattle. The Plat Map was filed for record on December 14, 1875 and can be obtained from King County Records Office or a title company.

Sample elevation in feet

MASSEX-9-61.0

Sample name

0 30 60

Feet

Characterization soil sample location. Diesel- and heavy oil-range hydrocarbons and/or cPAHs were detected at concentrations below MTCA Method A Cleanup Level. Soil represented by this sample was subsequently excavated and transported from the site to Waste Management's Landfill for permitted disposal.

Confirmation soil sample location. Diesel- and heavy oil-range hydrocarbons and cPAHs were not detected.

Mass Excavation for removing contaminated and/or impacted fill soil.

Soil Sample

Mass excavation limits

Subject Property

King County Parcel

0660000545 Parcel Number

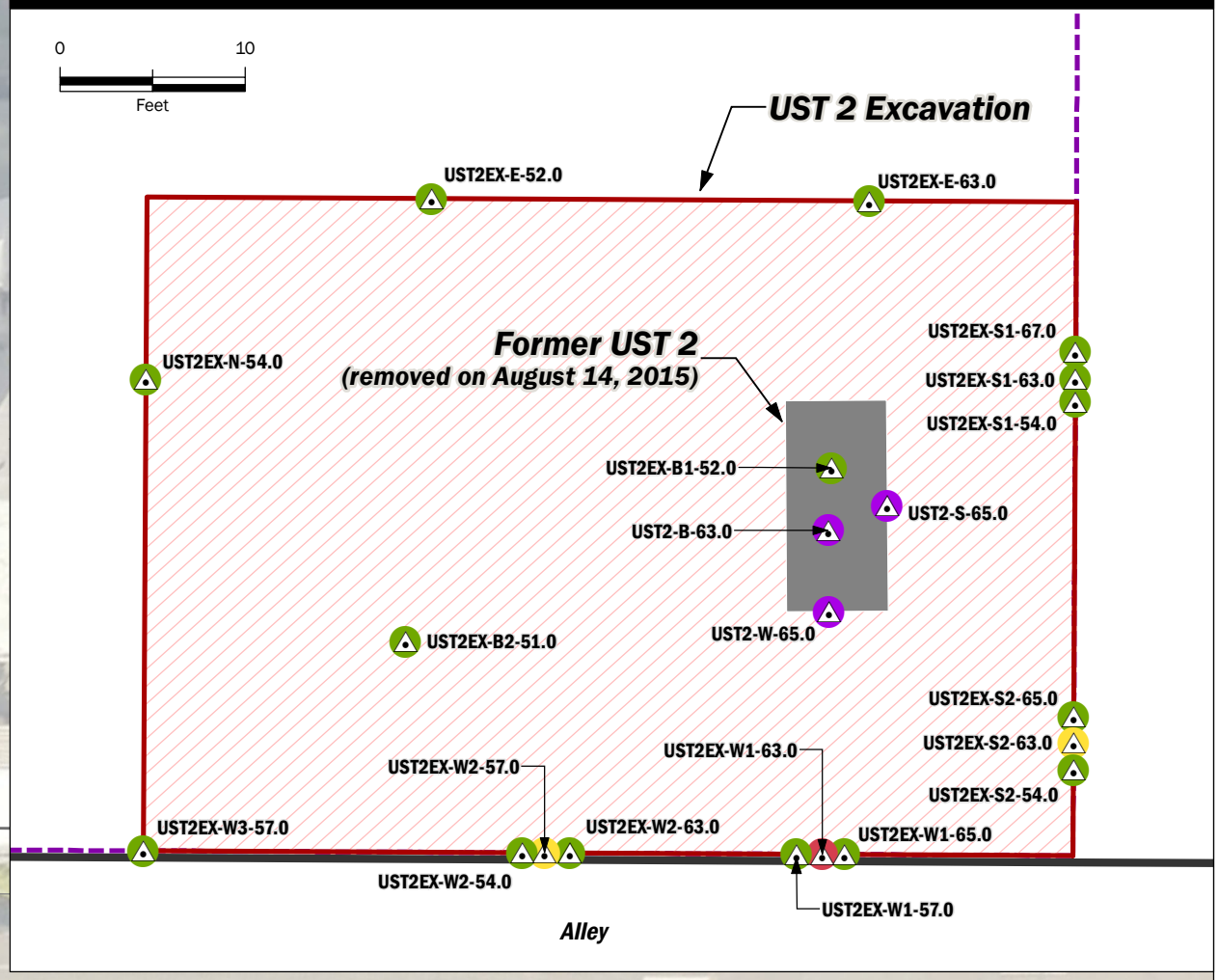
MTCA: Model Toxics Cleanup Control Act
cPAH: Carcinogenic polycyclic aromatic hydrocarbons

Mass Excavation with Confirmation Soil Samples

Cleanup Action Report
820 Lenora Street
Seattle, Washington

Aspect Consulting	SEP-2019	BY: FK / KES	FIGURE NO. 4
	PROJECT NO. 170291	REVISED BY: TDR	

Inset Map of UST 2 Removal



Note:

1. The Subject Property boundary is based on the Plat Map of the Second Addition to the Town of Seattle. The Plat Map was filed for record on December 14, 1875 and can be obtained from King County Records Office or a title company.

Sample elevation in feet
MASSEX-9-61.0
Sample name

0 30 60
Feet

N

Soil sample with MTCA exceedance for PAHs and/or diesel- and heavy oil- range hydrocarbons. Soil represented by this sample was subsequently excavated and transported to Waste Management's Landfill for permitted disposal.

Represents Soil Conditions at the Final Limits of Excavation

Confirmation soil sample with MTCA exceedance for heavy oil- range hydrocarbons and PAHs.

Confirmation soil sample in which diesel- and heavy oil-range hydrocarbons and PAHs were detected at concentrations below MTCA Method A Cleanup Levels.

Confirmation soil sample with no detections of petroleum hydrocarbons and PAHs.

Soil Sample

Mass excavation limits

Subject Property

King County Parcel

0660000545 Parcel Number

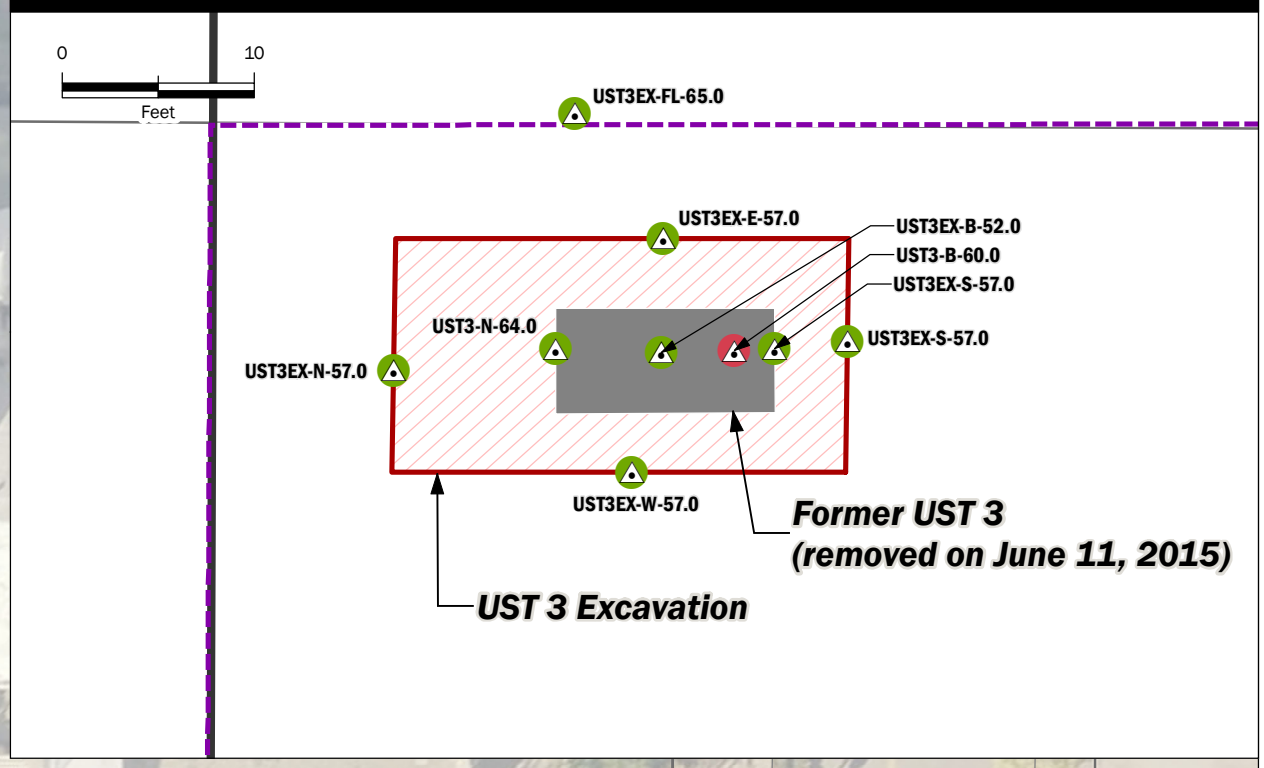
MTCA: Model Toxics Cleanup Control Act
PAH: Polycyclic aromatic hydrocarbons
UST: Underground Storage Tank

UST2 Remedial Excavation with Confirmation Soil Samples

Cleanup Action Report
820 Lenora Street
Seattle, Washington

Aspect Consulting	SEP-2019	BY: FK / KES	FIGURE NO. 5
	PROJECT NO. 170291	REVISED BY: TDR	

Inset Map of UST 3 Removal



Whole Foods

8729740000

Condominiums

9TH AVE

Inset Map (see above)

Former UST 3

UST 3 Excavation

STRATUS APARTMENTS
(820 LENORA STREET)

Retail
0660000525

Former Enterprise
(2118 Westlake Ave)
0660000540

Former Braseth Gallery
(2101 9th Ave)
0660000545

Former UST 2

More Information on Figure 5

Washington Talking Book Braille Library (2021 & 2025 9th Ave)
6094900000

WESTLAKE AVE

Alley

LENORA ST

Future City of Seattle Park
0660000485

Condominiums
0660000575

Note:

1. The Subject Property boundary is based on the Plat Map of the Second Addition to the Town of Seattle. The Plat Map was filed for record on December 14, 1875 and can be obtained from King County Records Office or a title company.

Sample elevation in feet
MASSEX-9-61.0
Sample name

0 30 60
Feet

Soil sample with MTCA exceedance for diesel-range hydrocarbons. Soil represented by this sample was subsequently excavated and transported to Waste Management's Landfill for permitted disposal.

Confirmation soil sample with no detections of diesel- and heavy oil- range hydrocarbons. Represent soil conditions at the final excavation limits.

Soil Sample

Mass excavation limits

Subject Property

King County Parcel

0660000545 Parcel Number

MTCA: Model Toxics Cleanup Control Act
UST: Underground Storage Tank

UST3 Remedial Excavation with Confirmation Soil Samples

Cleanup Action Report
820 Lenora Street
Seattle, Washington

Aspect Consulting	SEP-2019	BY: FK / KES	FIGURE NO. 6
	PROJECT NO. 170291	REVISED BY: TDR	

Whole Foods

8729740000

Condominiums

Social Security Administration (901 Lenora St)
0660001310

9TH AVE

A'

A

B

B'

UTL9-E
Benzene: 0.06 (15 ft)
GRO: 50 (18 ft)

B-1
Benzene: 0.23 (18 ft)

UTL9-N

UTL9-S

EX-1

STRATUS APARTMENTS
(820 LENORA STREET)

Retail
0660000525

Former Enterprise
(2118 Westlake Ave)
0660000540

Former Braseth Gallery
(2101 9th Ave)
0660000545

B-2
GRO: 2400 X (24 ft)
ORO: 18000 (24 ft)
Toluene: 11 (24 ft)

DP-5

UST2EX-W1
Benzo(a)pyrene: 0.11 (24 ft)
cPAH TEQ: 0.1501 (24 ft)
ORO: 19000 (24 ft)

UST2EX-S1

DP-4

MW-5

DP-2
cPAH TEQ: 0.125 (8 ft)
DRO: 2900 (8 ft)
ORO: 15000 (8 ft)

UST2EX-B1

UST2EX-W3

DP-3

Alley

GEI-1

DP-1
Benzo(a)pyrene: 0.22 (4 ft)
cPAH TEQ: 0.2941 (4 ft)

WESTLAKE AVE

LENORA ST

Future City of Seattle Park
0660000485

Washington Talking Book Braille Library (2021 & 2025 9th Ave)
6094900000

Condominiums
0660000575

Note:

1. The Subject Property boundary is based on the Plat Map of the Second Addition to the Town of Seattle. The Plat Map was filed for record on December 14, 1875 and can be obtained from King County Records Office or a title company.

Exploration name
B-1
Benzene: 0.23 (18 ft) ← Sample depth
Analyte with concentration in milligrams per kilogram
Metals
PAHs
Diesel or oil-range hydrocarbons
Gasoline-range hydrocarbons and/or benzene, toluene, ethylbenzene, and xylenes

0 30 60
Feet

PAH: Polycyclic aromatic hydrocarbons
MTCA: Model Toxics Cleanup Control Act
GRO: Gasoline-range organics
DRO: Diesel-range organics
ORO: Oil-range organics

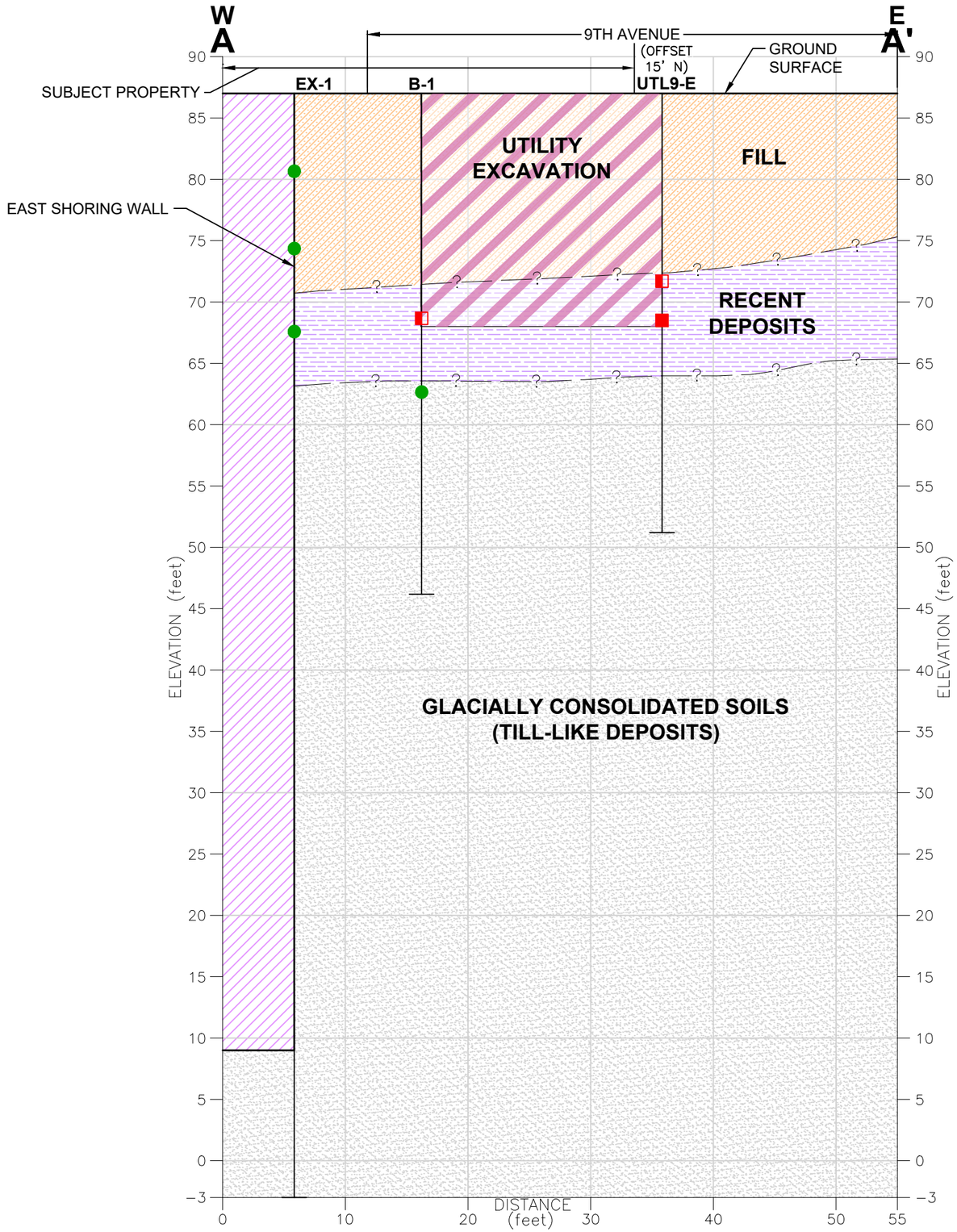
- Contaminant concentration greater than the MTCA Method A Cleanup Level
- Contaminant concentration less than the MTCA Method A Cleanup Level
- Contaminant not detected
- Sample not submitted for analyte testing
- Soil Sample
- Soil Boring
- Former Monitoring Well
- Approximate extent of utility excavation
- Mass excavation limits
- Approximate known extent of residual PAHs and/or petroleum-contaminated soil with MTCA exceedance
- Interpreted extent of gasoline and benzene contaminated soil with MTCA exceedance at Subject Property from an off property source
- Cross Section
- Subject Property
- King County Parcel
- 0660000545 Parcel Number

Post-Cleanup Soil Conditions at the Subject Property and Alley

Cleanup Action Plan
820 Lenora Street
Seattle, Washington

Aspect Consulting	SEP-2019	BY: FK / KES	FIGURE NO. 7
	PROJECT NO. 170291	REVISED BY: TDR	

Basemap Layer Credits || Pictometry, King County



EXPLANATION:

- Benzene and Gasoline Detected at a concentration greater than the MTCA Method A Cleanup Level
- Benzene Detected at a concentration greater than the MTCA Method A Cleanup Level
- Gasoline and Benzene not detected

MTCA Model Toxics Control Act

(OFFSET 15' N) **UTL9-E** Sample number and approximate location

Soil contact

- Fill
- Recent deposits
- Glacially consolidated soils (till–like deposits)
- Soil at the Subject Property was excavated to an approximate elevation of 9 feet during mass excavation
- Deep sewer utility excavation

0 10 20
Feet

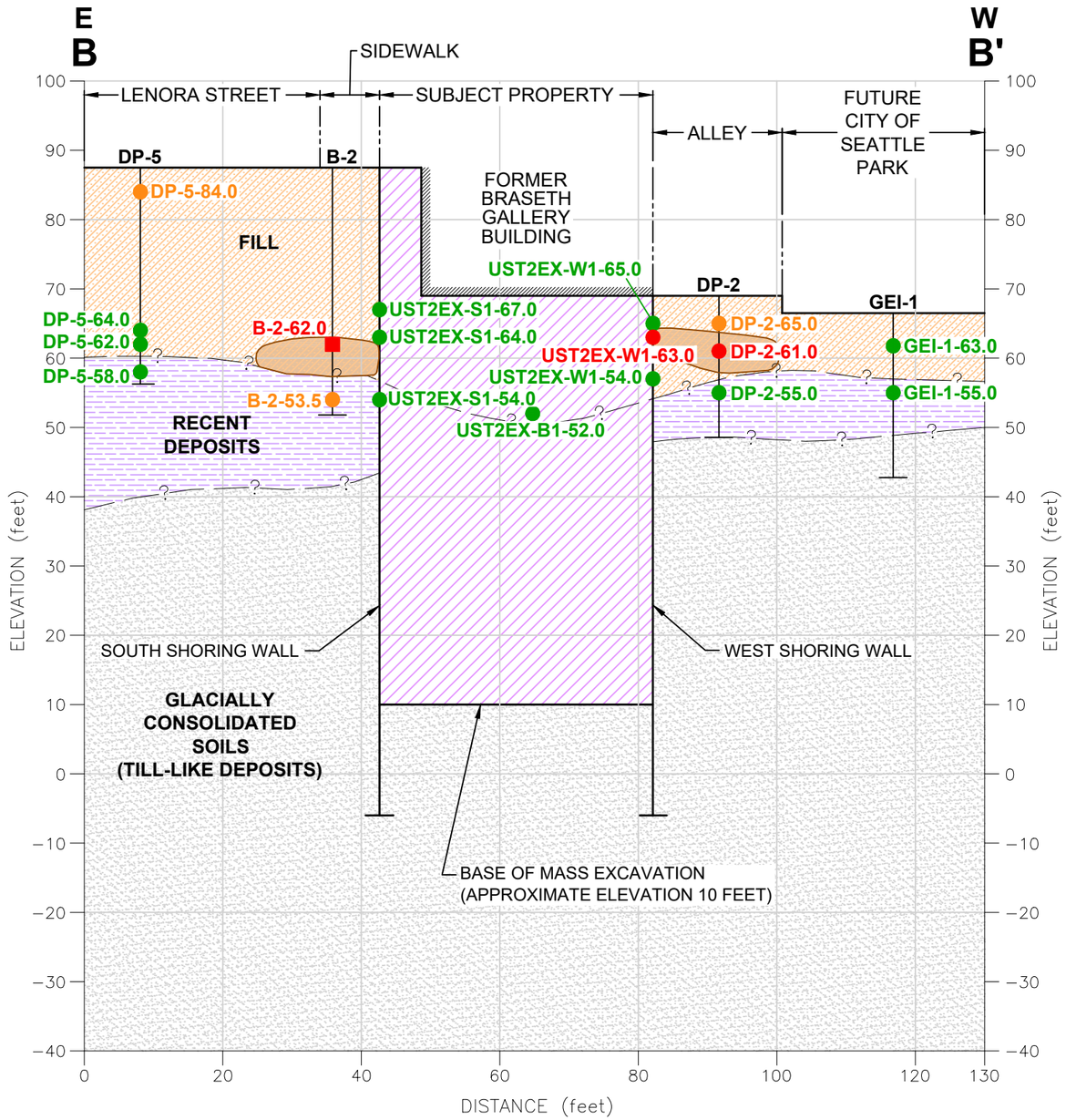
Notes:

1. The subsurface conditions shown are based on interpolation between widely spaced explorations and should be considered approximate; actual subsurface conditions may vary from those shown.
2. Refer to Figure 7 for location of Cross Section.
3. This figure is for informational purposes only. It is intended to assist in the identification of features discussed in a related document. Data were compiled from sources as listed in this figure. The data sources do not guarantee these data are accurate or complete. There may have been updates to the data since the publication of this figure.
4. Figure sourced from GeoEngineers, Cross Section C-C' Figure 7, 2016.

Cross Section A-A'

Cleanup Action Report
820 Lenora Street
Seattle, Washington

Aspect CONSULTING	SEP-2019	BY: FK / TDR	FIGURE NO. 8
	PROJECT NO. 170291	REV BY: ---	



Notes:

1. The subsurface conditions shown are based on interpolation between widely spaced explorations and should be considered approximate; actual subsurface conditions may vary from those shown.
2. Refer to Figure 7 for location of Cross Section.
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4. Figure sourced from GeoEngineers, Cross Section A-A' Figure 6, 2016.

Legend

- Soil sample with gasoline- and heavy oil-range hydrocarbons and toluene detections greater than MTCA Method A Cleanup Levels
- Soil sample with MTCA exceedance for diesel- and heavy oil-range hydrocarbons and PAHs
- Soil sample with petroleum hydrocarbons and PAHs detections less than MTCA Method A Cleanup Levels
- Soil sample non-detect for petroleum hydrocarbons and PAHs

MTCA Model Toxics Control Act

PAHs Polycyclic aromatic hydrocarbons

DP-2 Exploration and approximate location

Soil contact

Approximate thickness of residual MTCA exceeding petroleum- and PAHs- contaminated soil

Fill

Recent deposits

Glacially consolidated soils (till-like deposits)

Former Braseth Gallery building was demolished and soil at the subject property was excavated to an approximate Elevation of 7 feet, NAVD88, during mass excavation

0 20 40
Feet

Cross Section B-B'

Cleanup Action Report
820 Lenora Street
Seattle, Washington

Aspect Consulting	SEP-2019	BY: FK / TDR	FIGURE NO. 9
	PROJECT NO. 170291	REV BY: ---	

Whole Foods

8729740000

Condominiums

Social Security Administration (901 Lenora St)
0660001310

9TH AVE

STRATUS APARTMENTS
(820 LENORA STREET)

Retail
0660000525

Former Enterprise
(2118 Westlake Ave)
0660000540

Former Braseth Gallery
(2101 9th Ave)
0660000545

B-3
Arsenic: 100
Chromium: 3200
DRO: 73000
Lead: 8100
Mercury: 3.7
ORO: 470000

DP-5
Arsenic: 43
Chromium: 310
Lead: 41

B-2
Arsenic: 10
Chromium: 70
GRO: 28000
Lead: 69
ORO: 540000

DP-4
Arsenic: 82
Chromium: 720
Lead: 84

DP-3
Arsenic: 25
Chromium: 90

Alley

WESTLAKE AVE

Future City of Seattle Park
0660000485

LENORA ST

Washington Talking Book Braille Library (2021 & 2025 9th Ave)
6094900000

Condominiums
0660000575

Note:

1. The Subject Property boundary is based on the Plat Map of the Second Addition to the Town of Seattle. The Plat Map was filed for record on December 14, 1875 and can be obtained from King County Records Office or a title company.

2. Perched water - Although petroleum hydrocarbons (in B-2 and B-3) and metals (arsenic, chromium, lead, and/or mercury [in B-3 only]) were detected at concentrations greater than MTCA Method A Cleanup Levels in perched water these results are not representative of groundwater quality at the Site. Because these discrete, one-time samples were obtained directly from the boreholes of borings they are considered to be reconnaissance samples. These samples were biased high for contaminants because silt particles were present in the samples as a result of the sampling process. Perched water is not a media of concern at this Site because it was not encountered within the mass excavation limits. Additionally, groundwater samples collected from monitoring wells completed to the regional aquifer beneath the Site (approximate Elevation 14 feet, NAVD88) were tested and did not contain contaminants of concern at levels of regulatory significance. (Source: Remedial Investigation/Feasibility Study report by GeoEngineers, Inc. dated March 24, 2016).

3. Groundwater - Groundwater samples obtained and tested in April 2014 and July 2015 from G-1, screened within the regional aquifer showed that arsenic, chromium, and lead were present at concentrations less than MTCA Method A Cleanup Levels and petroleum hydrocarbons were not detected. Additionally, a groundwater sample from an off-property monitoring well MW-5 located across Lenora Street indicated no detections of petroleum. (Source: Remedial Investigation/Feasibility Study report by GeoEngineers, Inc. dated March 24, 2016).

Exploration name

DP-3
Arsenic: 25
Chromium: 90

Analyte with concentration in micrograms per liter

Metals

Diesel range hydrocarbons

Gasoline range hydrocarbons

Benzene, toluene, ethylbenzene, and xylenes

0 30 60
Feet

PAH: Polycyclic aromatic hydrocarbons
MTCA: Model Toxics Cleanup Control Act
GRO: Gasoline-range organics
DRO: Diesel-range organics
ORO: Oil-range organics

N

Contaminant concentration greater than the MTCA Method A Cleanup Level

Contaminant concentration less than the MTCA Method A Cleanup Level

Contaminant not detected

Sample not submitted for analyte testing

Perched Water Sample from Soil Boring

Mass excavation limits

Approximate known extent of residual PAHs and/or petroleum-contaminated soil with MTCA exceedance

Interpreted extent of gasoline and benzene contaminated soil with MTCA exceedance at Subject Property from an off property source

Subject Property

King County Parcel

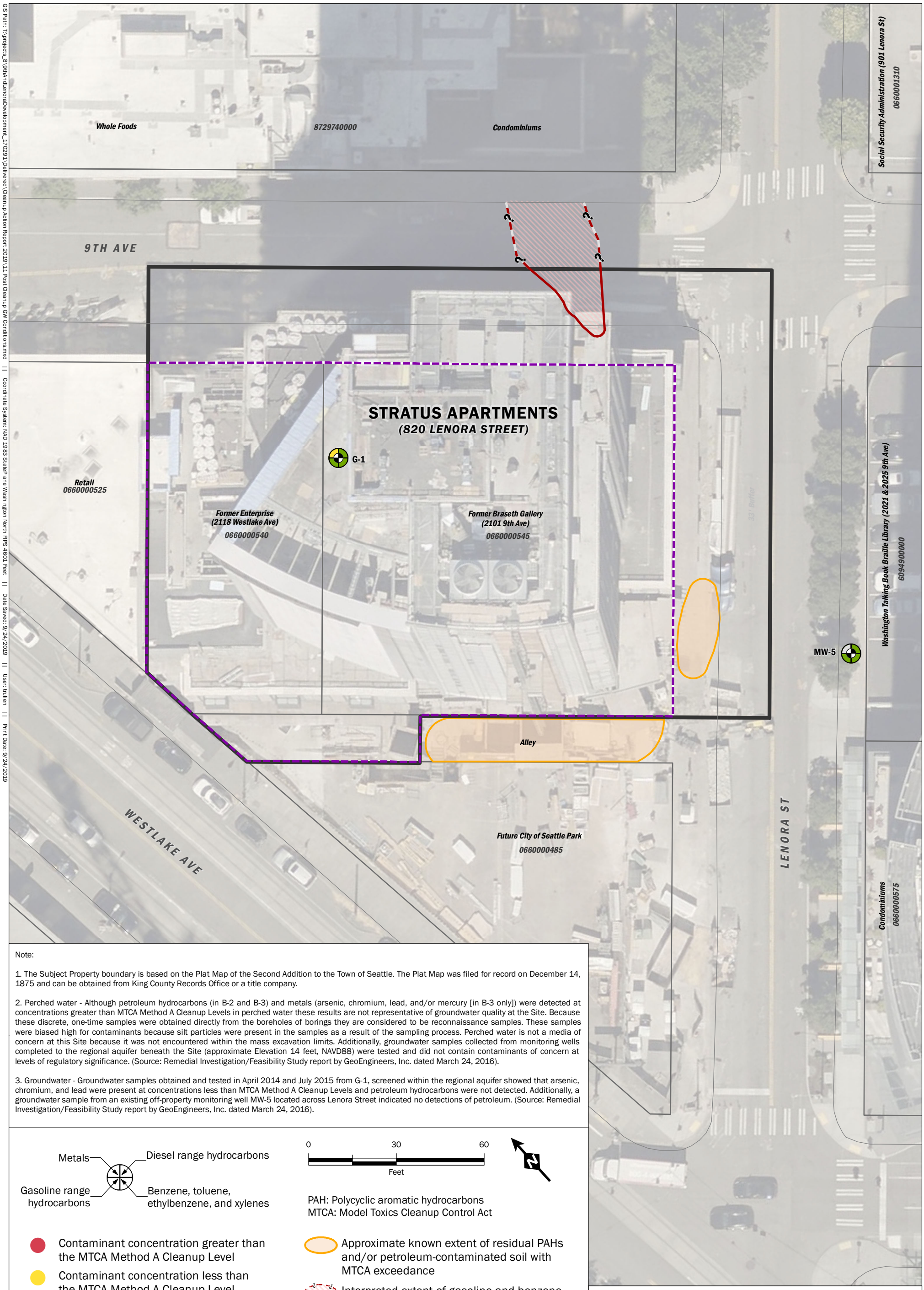
0660000545 Parcel Number

Post-Cleanup Perched Water Conditions at the Subject Property and Vicinity

Cleanup Action Report
820 Lenora Street
Seattle, Washington

Aspect Consulting	SEP-2019	BY: FK / KES	FIGURE NO. 10
	PROJECT NO. 170291	REVISED BY: TDR	

Basemap Layer Credits || Pictometry, King County



Note:

1. The Subject Property boundary is based on the Plat Map of the Second Addition to the Town of Seattle. The Plat Map was filed for record on December 14, 1875 and can be obtained from King County Records Office or a title company.

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3. Groundwater - Groundwater samples obtained and tested in April 2014 and July 2015 from G-1, screened within the regional aquifer showed that arsenic, chromium, and lead were present at concentrations less than MTCA Method A Cleanup Levels and petroleum hydrocarbons were not detected. Additionally, a groundwater sample from an existing off-property monitoring well MW-5 located across Lenora Street indicated no detections of petroleum. (Source: Remedial Investigation/Feasibility Study report by GeoEngineers, Inc. dated March 24, 2016).

PAH: Polycyclic aromatic hydrocarbons
MTCA: Model Toxics Cleanup Control Act

- Contaminant concentration greater than the MTCA Method A Cleanup Level
- Contaminant concentration less than the MTCA Method A Cleanup Level
- Contaminant not detected
- Sample not submitted for analyte testing
- Groundwater Sample from Former Monitoring Well
- Mass excavation limits
- Approximate known extent of residual PAHs and/or petroleum-contaminated soil with MTCA exceedance
- Interpreted extent of gasoline and benzene contaminated soil with MTCA exceedance at Subject Property from an off property source
- Subject Property
- King County Parcel
- 0660000545 Parcel Number

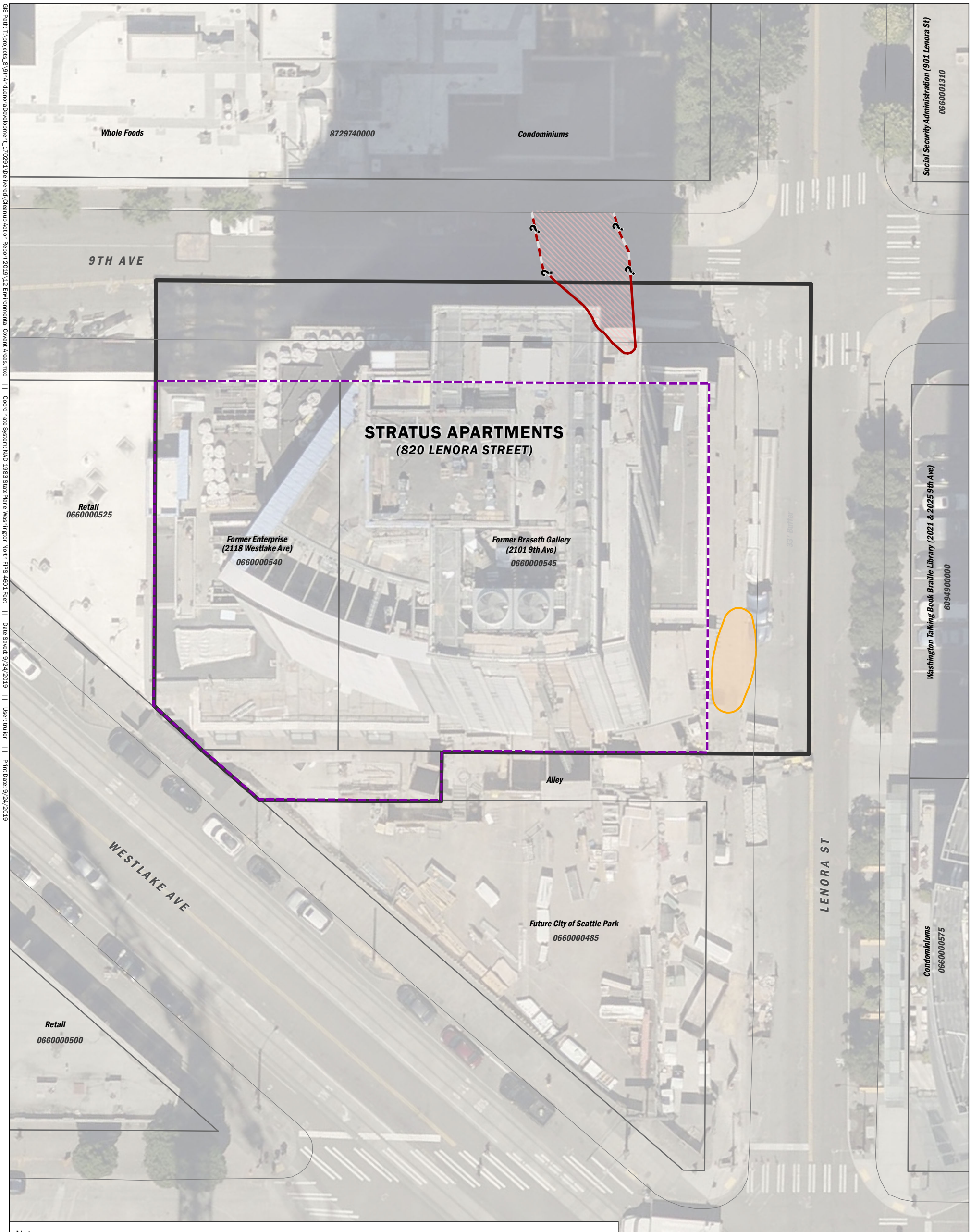
Post-Cleanup Groundwater Conditions at the Subject Property and Vicinity

Cleanup Action Report
820 Lenora Street
Seattle, Washington

Aspect Consulting	SEP-2019	BY: FK / KES	FIGURE NO. 11
	PROJECT NO. 170291	REVISED BY: TDR	

Basemap Layer Credits || Pictometry, King County

GIS Path: T:\projects_8\9thAndLenoraDevelopment_170291\Delivered\Cleanup Action Report 2019\11 Post Cleanup GW Conditions.mxd || Coordinate System: NAD 1983 StatePlane Washington North FIPS 4601 Feet || Date Saved: 9/24/2019 || User: trullen || Print Date: 9/24/2019



Note:

1. The Subject Property boundary is based on the Plat Map of the Second Addition to the Town of Seattle. The Plat Map was filed for record on December 14, 1875 and can be obtained from King County Records Office or a title company.

- Mass excavation limits
- Approximate known extent of residual PAHs and/or petroleum-contaminated soil with MTCA exceedance
- Interpreted extent of gasoline and benzene contaminated soil with MTCA exceedance at Subject Property from an off property source
- Subject Property
- King County Parcel
- 0660000545 Parcel Number

0 30 60
Feet

MTCA: Model Toxics Cleanup Control Act
PAH: Polycyclic aromatic hydrocarbons

Subject Property- Environmental Covenant Areas

Cleanup Action Report
820 Lenora Street
Seattle, Washington

Aspect Consulting	SEP-2019	BY: FK / KES	FIGURE NO. 12
	PROJECT NO. 170291	REVISED BY: TDR	

Basemap Layer Credits || Pictometry, King County