PARTNER

SOIL MANAGEMENT PLAN

5711 Olympic Highway
Aberdeen, Washington 98520

June 11, 2021
Partner Project Number: 21-319261.2

Prepared for:

SimonCRE Maroon III, LLC
6900 East 2nd Street
Scottsdale, Arizona 85251

Engineers who understand your business

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1.0 INTRODUCTION

Partner Engineering and Science, Inc. (Partner) was retained by SimonCRE Maroon III, LLC to prepare the following Soil Management Plan (SMP) for the property located at 5711 Olympic Highway, Aberdeen, Grays Harbor County, Washington.

1.1 Purpose

The purpose of the SMP is to outline protocol for ensuring the proper handling and/or disposal of impacted soil and/or subsurface features of concern that may be encountered during site redevelopment activities. The SMP was prepared to minimize potential exposure to impacted soil by construction, facility, and maintenance personnel; tenants; contractors and vendors; and the general public. This SMP only applies to the soil and/or subsurface features that may be encountered at the subject property.

1.1 Limitations

Conclusions and/or recommendations are based on the observations, laboratory analyses, and the governing regulations. Conclusions and/or recommendations beyond those stated and reported herein should not be inferred from this document.

Partner warrants that the environmental consulting services contained herein were accomplished in accordance with generally accepted practices in the environmental engineering, geology, and hydrogeology fields that existed at the time and location of work. No other warranties are implied or expressed.

1.2 User Reliance

Partner was engaged by SimonCRE Maroon III, LLC (the Addressee), or their authorized representative, to perform this management plan. The engagement agreement specifically states the scope and purpose of the investigation, as well as the contractual obligations and limitations of both parties. This report and the information therein, are for the exclusive use of the Addressee. This report has no other purpose and may not be relied upon, or used, by any other person or entity without the written consent of Partner. Third parties that obtain this report, or the information therein, shall have no rights of recourse or recovery against Partner, its officers, employees, vendors, successors or assigns. Any such unauthorized user shall be responsible to protect, indemnify and hold Partner, the Addressee and their respective officers, employees, vendors, successors and assigns harmless from any and all claims, damages, losses, liabilities, expenses (including reasonable attorneys' fees) and costs attributable to such use. Unauthorized use of this report shall constitute acceptance of, and commitment to, these responsibilities, which shall be irrevocable and shall apply regardless of the cause of action or legal theory pled or asserted.

This report has been completed under specific Terms and Conditions relating to scope, relying parties, limitations of liability, indemnification, dispute resolution, and other factors relevant to any reliance on this report. Any parties relying on this report do so having accepted Partner's standard Terms and Conditions, a copy of which can be found at http://www.partneresi.com/terms-and-conditions.php.

2.0 SITE BACKGROUND

2.1 Site Description

The subject property consists of a portion of one parcel of land comprising 1.25 acres located on the southern side of Olympic Highway and the western side of Solki Road within a mixed residential and commercial area of Aberdeen, Grays Harbor County, Washington. The subject property is currently developed with two single-story buildings, one with a basement, which were constructed in 1928 and are occupied by a single-family residence and a detached garage for residential use. In addition to the structures, the subject property is improved with associated landscaping.

The subject property is bound by Olympic Highway followed by residential properties to the north, Sulki Road followed by residential and commercial properties to the east, a commercial property to the south, and vacant land to the west. Refer to Figure 1 for a site vicinity map showing site features and surrounding properties.

2.2 Site History

Partner completed a *Phase I Environmental Site Assessment Report* (Phase I) for the subject property, dated May 21, 2021, on behalf of SimonCRE Maroon III, LLC. According to the reviewed historical sources, the subject property was previously developed with the current residence in 1928 and developed with a gasoline station from as early as 1971 until *circa* 1990. Tenants on the subject property include residential tenants (1992-Present); Midway Auto Sales (2000); and Pe Ell Hulk Hauling (2010).

The following historical recognized environmental condition (HREC) was identified in the Phase I:

- The subject property, identified as Chevron Station 95777/Central Park Chevron/Pe Ell Hulk Hauling at 5719 and 5715 Olympic Highway, was formerly occupied by a gasoline station from as early as 1971 until *circa* 1990. The station was historically equipped with five steel, single-walled underground storage tanks (USTs) for the storage of gasoline and waste oil. The specific age, date of installation, and tank construction is unknown, but all five USTs have reportedly been removed. The subject property reported a release of petroleum products to the Washington State Department of Ecology (Ecology) on June 20, 1990, which reportedly impacted soil and groundwater. The release occurred as a result of the former gasoline station and associated USTs. The site (Cleanup ID: 4991) was remediated by means of independent action and through Ecology's Voluntary Control Program (VCP). Ecology issued regulatory closure to the subject property on September 17, 2019. Regulatory files associated with the subject property were requested from the Ecology, however, were pending as of the date of the Phase I. Based on the regulatory closure, the former on-site gasoline station is considered an HREC. However, there is a potential for there to be residual impacts to the subsurface on-site (unknown due to lack of Ecology files). Partner recommended a Soil Management Plan be prepared and implemented for the subject property during redevelopment.

3.0 GEOLOGY AND HYDROGEOLOGY

Review of the United States Geological Survey (USGS) *Central Park, Washington* Quadrangle topographic map, indicates the subject property is situated approximately 107 feet above mean sea level, and the local topography is sloping gently to the south. Refer to Figure 2 for a topographic map of the site vicinity.

The subject property is situated within the Willapa Hills physiographic province of the State of Washington. The Willapa Hills are part of the Coast Range and include the adjacent broad valleys that open up to the Pacific Ocean. Barrier beaches characterize the low-lying coastline, behind which are major estuaries at Grays Harbor and Willapa Bay. This province is underlain by Tertiary sedimentary and volcanic rocks deposited in nearshore embayments and shallow seas surrounding basalt islands. Flows of Columbia River basalt followed ancestral courses of the Columbia River until they reached the Pacific Ocean at Willapa Bay and Grays Harbor. As it flowed to the sea, meltwater from continental glaciers carved a wide valley along the present-day Black and Chehalis Rivers.

Based on a well log for the on-site well, the underlying subsurface consists predominantly of sand from the ground surface to approximately 8 feet below ground surface (bgs), silty sand and gravel from 8 to 30 feet bgs, and medium coarse sand from 30 to 35 feet bgs. Groundwater was encountered in the well at 27 feet bgs.

4.0 CHEMICALS OF CONCERN

Based on the limited knowledge of the known on-site impacts, soil chemicals of concern (COCs) at the subject property include petroleum hydrocarbons and volatile organic compounds.

5.0 SOIL MANAGEMENT

This section outlines the protocols for identifying, handling, and/or disposing of COC-impacted soil that may be encountered during ground cover demolition, Site grading, and/or other earthmoving activities that may be performed on the subject property. Partner understands that the Client intends to redevelop the subject property as a Dollar General for commercial use.

5.1 Applicability

The SMP applies to ground cover removal and/or demolition and/or soil-disturbing activities associated with the Site redevelopment, including excavation, grading, trenching, utility installation, and/or other activities that could potentially generate COC-impacted soil. Field personnel directly involved with earthmoving activities should be familiar with the contents of the SMP.

5.2 Duration

Implementation of the SMP is intended to coincide with the start of ground cover removal and/or demolition and Site grading activities and shall remain in effect for the duration of the Site redevelopment involving soil-disturbing activities.

5.3 Key Roles and Responsibilities

The following is a list of key roles involved with the SMP and the respective general responsibilities:

- Client (SimonCRE Maroon III, LLC) – Responsible for selecting and engaging the main contractor(s) and environmental consultants(s) involved with the subject property redevelopment and/or implementation of the SMP;
- General Contractor (GC) – Responsible for overseeing the subject property grading/redevelopment/construction activities, managing the associated subcontractors (including the dewatering subcontractor, if necessary), and the initial soil screening (refer to Section 5.9 for additional details); and,
- Environmental Consultant (EC) – Responsible for implementing the SMP.

5.4 Work Area Control

Control of the work area (e.g., perimeter fencing) will be the responsibility of the GC. In general, the work area should be secured as to limit access only to the personnel qualified and authorized to be on-site.

5.5 Health and Safety

EC will prepare a separate site-specific health and safety plan (HASP) that will be implemented in conjunction with the SMP when handling soil with suspected or confirmed COC impacts. At a minimum, the HASP will identify the potential COCs and/or other hazards of concern and establish guidelines and/or procedures for controlling/minimizing exposures to potential COCs/hazards, including the appropriate level(s) of personal protective equipment (PPE). The GC will be responsible for non-COC-related health and safety concerns associated with the excavation (e.g., excavation stability, stockpile placement, heavy equipment operation, etc.).

5.6 Permitting

If permits are required for specific tasks (e.g. stockpiling, disposal, onsite re-use), the GC will facilitate permits in accordance with applicable State and/or Federal regulations.

5.7 Pre-Construction Meeting

Prior to grading/redevelopment/construction activities, representatives of the Client, the GC, and EC should meet to review and discuss the contents of the SMP, roles and responsibilities, and the grading/redevelopment schedule.

5.8 Undocumented Subsurface Features

The GC should cordon off and halt construction activities in the immediate area(s) of undocumented subsurface features of potential environmental concern (e.g., USTs, clarifiers, buried drums, residual impacted soil) if encountered during the course of ground cover removal and/or demolition, Site grading, and/or other earthmoving activities. The GC must promptly notify the Client and EC. The following general approach will be applied by the EC to address such subsurface features:

1) Notify the relevant regulatory oversight agency or agencies involved with the subsurface feature decommissioning / residual impacted soil and file the necessary permit(s), when applicable;
2) Decontaminate and decommission the subsurface feature(s) via removal (if practical) in accordance with generally accepted industry practices and the requirements of the filed permit(s) (where applicable);
3) Collect and analyze soil samples to evaluate potential chemical impacts to the subsurface due to a historical release or releases from subsurface feature(s), and assess the lateral and vertical extent of residual impacted soil; and
4) Document the decommissioning activities and soil handling / removal activities and findings in a summary report.

EC will provide specific protocols to address encountered subsurface features on a case-by-case basis based on the Site conditions and the nature of the subsurface features.

5.9 General Decision Process for Handling Disturbed Soil

Evaluating whether excavated soil is suitable for reuse on the Site and selecting which off-site facility or facilities are suitable for receiving exported soil will be based on up to three criteria: (1) field observations (e.g., evidence of staining, odor); (2) soil monitoring readings with an organic vapor analyzer (OVA); and/or (3) laboratory analysis results, as applicable. Refer to Appendix A for the general decision process for handling disturbed soil. The process steps are discussed in detail in the proceeding Sections.

5.10 Initial Soil Screening

The EC will be present as necessary for ground cover demolition activities, screening uncovered soil for evidence of potential COC-impacts, and if necessary, for assessing soil with observed impacts. As the demolition progresses, uncovered soil will be monitored for evidence of potential COC-impacts (e.g., staining, odor) and periodically field-screened for volatile organics using an OVA. Soil will be field-screened with the OVA at a minimum rate of one reading per approximately 400 square feet of uncovered soil, with a bias towards soil exhibiting evidence of potential COC-impacts, where encountered.

During subsurface investigation, soils with OVA readings of between 50 parts per million (ppm) and 200 ppm typically did not translate to significant petroleum or VOC impacts in soil after laboratory analysis. As a conservative measure, soil with OVA readings exceeding 50 ppm will be cordoned off as potential areas of concern (AOCs) for further evaluation, as discussed in the following section. In addition, soil exhibiting evidence of potential COC-impacts will also be cordoned off as AOCs for further evaluation. The remaining soil will be subject to further visual and OVA screening if disturbed during earthmoving activities.

5.11 Soil Segregation

Soil will be segregated per the following categories:

- **Unrestricted Soil**: Soil devoid of evident impacts (e.g., staining, odor, elevated OVA screening results) may be re-used on the Site as appropriate with no further action.
- **Non-VOC-Impacted Soil:** Soil that does not exhibit OVA readings over 50 ppm but contains visual or olfactory evidence of impacts. This soil is considered to be from an Area of Concern (AOC). This soil is to be sampled for determination if off-site disposal is required, detailed further in Section 5.13.
- **VOC-Impacted Soil:** Soil that exhibits OVA readings over 50 ppm and may or may not contain visual or olfactory evidence of impacts. This soil is considered to be from an AOC and is to be sampled for determination if off-site disposal is required, as detailed further in Section 5.13.

The primary criterion for segregating soil generated during soil-disturbing activities will be the field observations by the EC and GC excavation personnel. Soil devoid of evident impacts (e.g., staining, odor, elevated OVA screening results) will be deemed suitable for unrestricted on-site use and may be reused on-site as backfill material or exported off-site. Note that additional conditions not under consideration in this SMP (e.g., physical soil properties) may limit the use of soil deemed suitable for unrestricted on-site use under this SMP.

If soil exhibiting discoloration and/or odor is encountered during the course of soil-disturbing activities, handling of soil exhibiting impacts should cease, the immediate area should be cordoned off by the GC, and EC should be notified of the encountered conditions. Soil disturbing activities in the cordoned off area may resume when the EC is on the Site. Soil exhibiting impacts should remain segregated in separate stockpiles from soil deemed suitable for unrestricted on-site use.

5.12 Soil Stockpile Management

Once stockpile segregation oversight and sampling has been completed by the EC, the stockpile handling and management will be the responsibility of the GC. Stockpiles of VOC-impacted soil must be managed in the following manner:

- The soil stockpiles will be underlain by and covered with low-density polypropylene plastic sheeting no lighter than 2 mil during periods of inactivity of one hour or longer, each evening, and during weekends and holidays;
- The excavations, stockpiles, and haul routes will be sprayed with water from a water truck between excavation and loading shifts to control dust;
- The stockpiles must be on-site for no longer than 30 days; and
- The stockpiles must be inspected daily to confirm proper coverage.

Stockpiles of non-VOC-impacted soil should also be similarly managed unless laboratory analysis results indicate that the material is suitable for unrestricted on-site use (as discussed in Section 5.14).

5.12.1 Vapor Suppression and Dust Control

To suppress vapor emissions and dust during soil disturbances of VOC- and non-VOC-impacted soil, excavations should be kept moist by periodically spraying the work area with water. In addition, exposed soil surfaces of stockpiles of VOC-impacted soil should be kept moist with water.

Dust control during the Site redevelopment will defer to the protocol established by the GC.

5.12.2 Surface Water Protection

Responsibility for surface water protection (e.g., prevention of sediment runoff into storm drains) and implementation of best management practices (BMPs), if required for the Site redevelopment, will defer to the GC.

5.13 Soil Stockpile Sampling

5.13.1 Unrestricted Soils

Soil that does not have observable impacts or elevated OVA readings can be re-used on site without further assessment or sampling.

5.13.2 AOC Soils (VOC and Non-VOC-Impacted)

Stockpiled soil from AOC areas must be characterized through the collection and analysis of samples to evaluate the suitability of the material for reuse on-site or off-site disposal, as described in this section.

If deemed necessary, soil planned for export must be characterized through the collection and analysis of samples to evaluate whether the material meets the acceptance requirements of the receiving facility or facilities.

5.13.2.1 Sampling Frequency

In order to determine appropriate or disposal of AOC soil piles, the sampling program should follow protocols established by the receiving facility, or, in the absence of facility protocols, the sampling frequency should default to the procedures set forth in the most recently promulgated edition of the United States Environmental Protection Agency (EPA) Test Methods for Evaluating Solid Waste, Physical/Chemical Methods (EPA SW-846). In general, EPA SW-846 provides a method for assessing the mean concentration of a given chemical within a soil mass and the number of samples necessary to calculate this mean to within an acceptable confidence level.

The following sampling schedule should be used to estimate the minimum number of samples necessary to meet the statistical requirements set forth in EPA SW-846, although deviations from the schedule be occur per the EC's professional judgement:

- Stockpiles less than 500 cubic yards: one sample for every 25 cubic yards;
- Stockpiles from 500 to 1,000 cubic yards: twenty samples plus one sample for every 100 cubic yards in excess of the initial 500 cubic yards;

- Stockpiles from 1,000 to 10,000 cubic yards: twenty-five samples plus one sample for every 500 cubic yards in excess of the initial 1,000 cubic yards;
- Stockpiles greater than 10,000 cubic yards: forty-three samples plus one sample for every 5,000 cubic yards in excess of the initial 10,000 cubic yards.

Note that the above schedule is only a guide and that additional samples may be required to meet the statistical requirements set forth in EPA SW-846. In addition, it is not necessary to consider each individual stockpile separately. Soils in separate stockpiles that are expected to exhibit similar conditions of COC impacts can be considered part of the same soil mass for the purposes of EPA SW-846 sampling.

For exported soil, the sampling frequency will meet the requirement of the receiving facility. If there are no specific requirements set by the receiving facility, the protocols listed above may be followed.

5.13.2.2 Sampling Protocol

The method for selecting the soil stockpile sample locations (e.g., simple random sampling, systematic random sampling) will be based on the EC's professional judgment and/or field-screening results.

In general, discrete soil samples should be analyzed. However, composite sampling may be acceptable depending on the receiving facility requirements, the EC's professional judgment, and/or the target analytes. No more than four discrete samples should comprise a composite sample. Composite samples should not be analyzed for target analytes that are volatile or semi-volatile unless dictated by the receiving facility.

Samples should be collected in pre-cleaned, analysis-appropriate containers; preserved and stored as required for the specified analysis method; labeled with unique sample identifications; and transported to the laboratory under chain-of-custody protocol.

Sampling equipment should be decontaminated between sampling points to reduce the potential for cross-contamination.

5.13.2.3 Laboratory Analyses

At a minimum, the laboratory analysis suite (e.g., target analytes, methods) for visually stained and VOC-impacted soil planned as backfill should include the primary COCs listed in Section 4.0. For soil that will be exported, the laboratory analysis suite will default to the laboratory analysis suite specified by each selected receiving facility to meet the respective acceptance requirements, and/or default protocols established in Section 5.15.

The laboratory or laboratories performing the sample analyses should be State-certified and run surrogate samples and method blanks as part of the Quality Assurance/Quality Control (QA/QC) program. Analyses should be performed within the accepted method hold times.

5.14 On-Site Reuse of Excavated Soil

Unrestricted soil identified through the initial soil segregation as described in Section 5.13 may be reused on-site as backfill material.

For soil identified from AOC areas, the laboratory analysis results of will be compared to the latest promulgated editions of the EPA Industrial/Commercial RSLs (target Hazard Quotients of 1.0) and the Model

Toxics Control Act (MTCA) cleanup levels. Soil with concentrations of one or more COCs above thresholds are unsuitable for on-site reuse and must be transported to an appropriate off-site treatment/disposal facility. Soil that does not exceed the aforementioned criteria may be reused on the Site.

The SMP protocol for evaluating whether excavated soil is suitable for reuse on-site is based solely on the absence or presence and magnitude of COC impacts. Other factors (e.g., geotechnical and/or structural considerations) are not accounted for in the SMP and will be the responsibility of the GC. In addition, the GC will be responsible for evaluating the suitability of imported fill material for use on-site. The GC should not import COC-impacted backfill material to the Site.

5.15 Exporting Soil Off-Site

Three exported soil designation categories are anticipated for the Site: VOC-impacted (as determined with OVA screening), unrestricted (excess soil with no impacts), and non-hazardous (staining or odors observed with OVA readings under 50 ppm). The EC shall be responsible for determining export categories and requirements. Additionally, analytical results may determine that soil is Resource Conservation & Recovery Act (RCRA) hazardous. Generalized procedures for exporting each soil designation category are discussed in the following sections.

5.15.1 Exporting of VOC-Impacted Soil

Excavated soil classified as VOC-impacted through OVA screening as described in Section 4.10 is not permitted to be reused on-site as backfill unless further testing indicates it meets established criteria. If further sampling indicates that soil is above threshold values and requires off-site disposal, soil classified as VOC-impacted should be profiled based on laboratory analysis results and transported under waste manifest documentation to an approved facility or facilities permitted to receive the waste for treatment, recycling, and/or disposal. The EC in conjunction with the GC will be responsible for selecting the receiving facility or facilities for VOC-impacted soil. Note that although the soil will be designated as VOC-impacted, the soil is anticipated to be classified as non-hazardous (as opposed to RCRA or non-RCRA hazardous) for waste disposal purposes given the historical usage of the Site and the results of the prior subsurface investigations.

5.15.2 Exporting of Unrestricted Soil

The GC will be solely responsible for selecting and complying with the requirements of the facility or facilities that will receive the exported unrestricted soil (excess soil to be removed from the Site for which OVA screening and observations has determined to be free of impacts). Note that other considerations beyond the scope of the SMP may affect whether a receiving facility is able to accept unrestricted soil (e.g., soil properties such as pH).

5.15.3 Exporting of Non-Hazardous Soil

Exported soil will be classified as non-hazardous if soil monitoring results indicate that the soil is non-VOC-impacted, but exhibits an odor and/or discoloration, laboratory analysis results indicate the presence of COCs above the soil screening criteria for on-site reuse, and/or the material does not meet the acceptance requirements of the unrestricted soil receiving facility or facilities.

Soil classified as non-hazardous should be profiled based on laboratory analysis results and transported under waste manifest documentation to a facility or facilities permitted to receive the waste for treatment,

recycling, and/or disposal (typically a soil recycler or landfill). The EC or the EC in conjunction with the GC will be responsible for selecting the receiving facility or facilities for non-hazardous soil.

5.15.4 Soil Classified as Hazardous

Given the historical usage of the Site and the results of prior subsurface investigations, generation of soil classified as RCRA or non-RCRA hazardous (i.e., meeting Federal or State hazardous waste criteria, respectively) is not anticipated during grading/ redevelopment/construction activities. However, if identified through laboratory analysis results, soil classified as RCRA or non-RCRA hazardous (note that soil can be simultaneously classified as hazardous waste and VOC-impacted) should be profiled based on laboratory analysis results and transported under waste manifest documentation to a facility or facilities permitted to receive the waste for treatment, recycling, and/or disposal (typically a landfill or incinerator). Hazardous waste must be transported by a hauler licensed to transport hazardous waste. The EC or the EC in conjunction with the GC will be responsible for selecting the receiving facility or facilities for RCRA and/or non-RCRA hazardous soil.

6.0 SUMMARY AND CONCLUSIONS

The EC will prepare a summary report for submittal to the Client. At a minimum, the report will include a summary of field activities, laboratory analysis reports, and off-site disposal documentation (if soil was exported, excluding unrestricted soil). The Consultant will also be responsible for complying with regulatory agency reporting requirements if VOC-impacted soil was encountered.

SIGNATURES OF PARTICIPATING PROFESSIONAL

Thank you for the opportunity to be of service. If you have questions regarding this SMP, please contact Kathryn Peacock at (602) 680-6411.

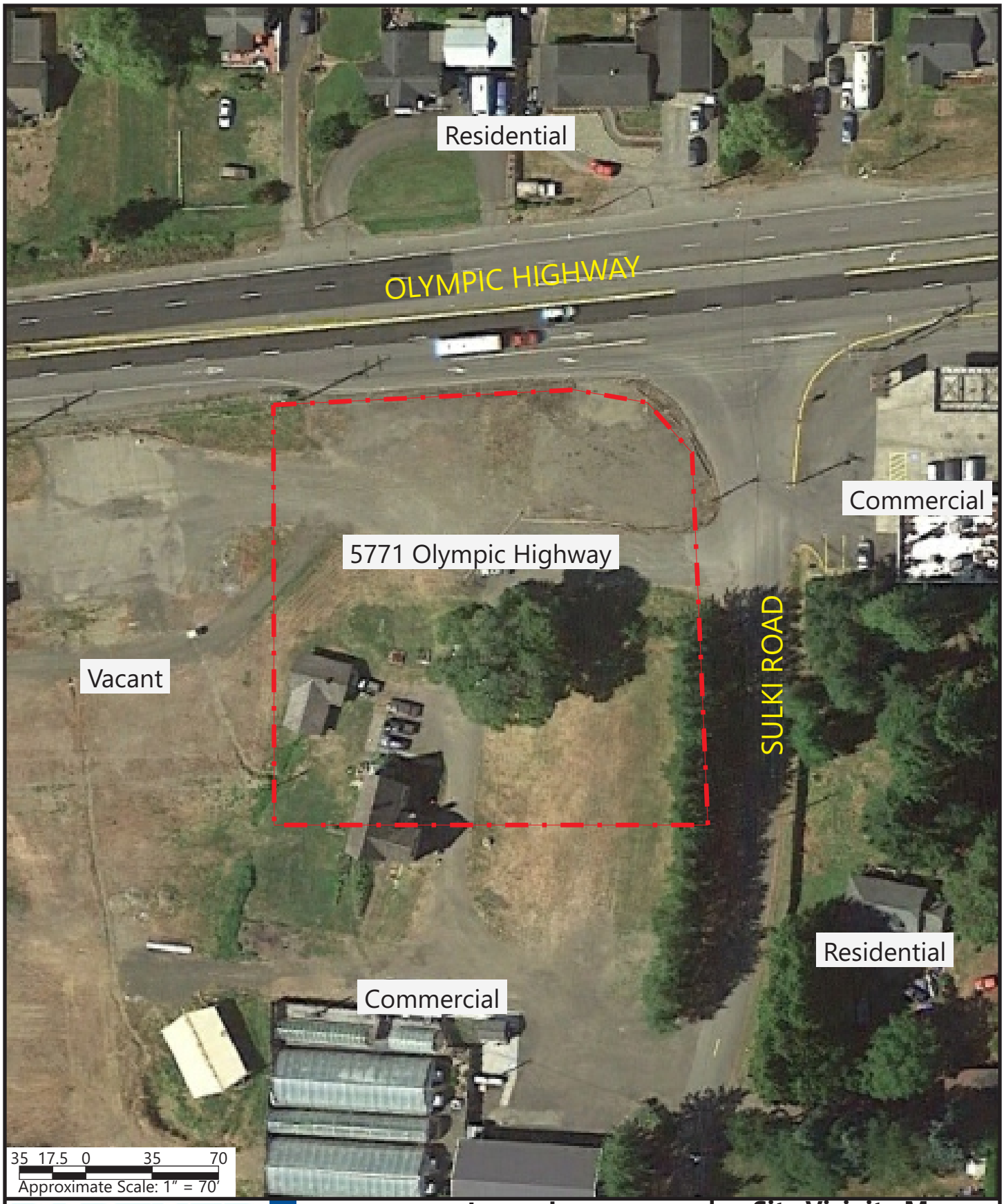
Sincerely,

Hunter White
Project Manager

Mitchell Williams, LG
Project Manager

FIGURES

PARTNER



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Project Number: 21-319261.2

N

Legend

Subject Property

Site Vicinity Map

Figure	Prepared By	Date
1	H. White	June 2021

5711 Olympic Highway
Aberdeen, Washington 98520

PARTNER

3607 1st Avenue Northwest
Seattle, Washington 98107

Project Number: 21-319261.2

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USGS *Central Park, Washington* Quadrangle
Version: 2014

Topographic Map

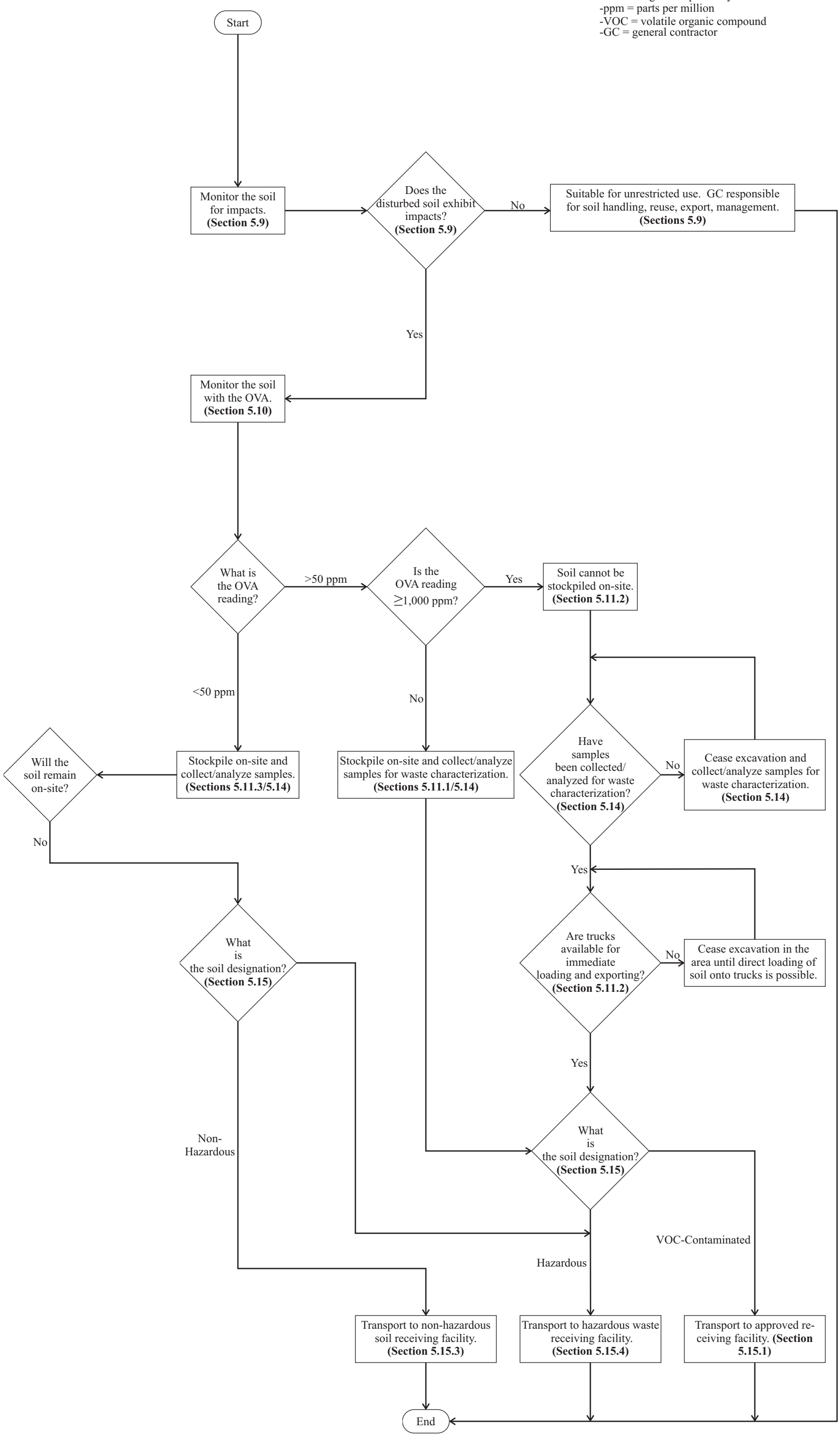
Figure	Prepared By	Date
2	H. White	June 2021

5711 Olympic Highway
Aberdeen, Washington 98520

APPENDIX A: GENERAL DECISION PROCESS FOR HANDLING DISTURBED SOIL

PARTNER

Legend:
-OVA = organic vapor analyzer
-ppm = parts per million
-VOC = volatile organic compound
-GC = general contractor



General Decision Process for Handling Disturbed Soil