State of Washington
POLLUTION LIABILITY INSURANCE AGENCY
PO Box 40930 • Olympia, Washington 98504-0930
(360) 407-0520 • (800) 822-3905
www.plia.wa.gov

March 4, 2022

Mr. Adam Rosen
ALCO Totem Lake, LLC
27402 72nd Avenue South
Kent, WA 98032

Re: No Further Action at the Following Site:

- **Facility/Site (owner) Name:** Slater Ave. Property - GTE Vehicle Center
- **Facility/Site Address:** 12055 Slater Avenue Northeast, Kirkland, WA 98034
- **Facility Site ID (TAP only):** 2555
- **Technical Assistance Program No.:** PNW179

Dear Mr. Rosen:

The Washington State Pollution Liability Insurance Agency (PLIA) received your request for an opinion on your independent cleanup of the Slater Ave. Property – GTE Vehicle Center located at 12055 Slater Avenue Northeast, Kirkland, WA (Site). This letter provides our opinion. Opinions by PLIA are made under the authority of Chapter 70A.330 RCW and Chapter 374-80 WAC. PLIA appreciates your initiative in pursuing this administrative option for cleaning up a contaminated site under the Model Toxics Control Act (MTCA), Chapter 70A.305 RCW.

Issue Presented and Opinion

Is further remedial action necessary to clean up petroleum contamination at the Site?

> PLIA has determined that **no further remedial action is necessary** to clean up petroleum contamination at the Site.

This opinion is based on an analysis of whether the remedial action meets the substantive requirements of MTCA, Chapter 70A.305 RCW, and its implementing regulations, Chapter 173-340 WAC (collectively "substantive requirements of MTCA"). The analysis is provided below.

Description of the Site

This opinion applies only to the Site located at 12055 Slater Avenue Northeast, Kirkland, WA 98034 and comprises one King County tax parcel described below. This opinion does not apply to any other hazardous substance release(s) that may affect the Property (parcels).

1. Description of the Site:

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

- Total petroleum hydrocarbons (TPH): TPH-d (diesel), TPH-o (oil) and TPH-g (gasoline) into the soil/groundwater/air.
- Volatile organic compounds: benzene, toluene, ethylbenzene and total xylenes (BTEX), and potentially naphthalene into the soil/groundwater/air.

The following parcel(s) have been impacted by the release(s):

- King County Parcel No. 282605-9181

Basis of the Opinion

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

1. Cleanup Action Report – Slater Avenue Property, 12055 Slater Avenue Northeast, Kirkland, Washington. Project No. 1410-002. Prepared by SoundEarth Strategies, Inc. October 12, 2021.
2. Remedial Investigation, Feasibility Study, and Cleanup Action Plan Report, Slater Avenue Property (GTE Vehicle Center), 12055 Slater Avenue Northeast, Kirkland, Washington. Project No. 1410-002. Prepared by SoundEarth Strategies, Inc. April 10, 2020.

Documents submitted to PLIA are subject to the Public Records Act (Chapter 42.56 RCW). To make a request for public records, please email pliamail@plia.wa.gov.

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

Establishment of Cleanup Standards and Points of Compliance

PLIA has determined the cleanup levels (CULs) and points of compliance (POCs) you established for the Site meet the substantive requirements of MTCA. It is presumed that if

you meet the cleanup standards under MTCA, the Site will be protective of human health and the environment for current and future property use.

1. CULs:

Table 1. The proposed soil and groundwater cleanup levels are:

Contaminants of Concern (COCs)	**Method A** Soil Cleanup Level Unrestricted Land Use mg/kg	**Method B** Soil Cleanup Level Unrestricted Land Use mg/kg	**Method A** Groundwater Cleanup Level ug/l
TPH-d	2,000	(Site Specific)	500
TPH-g	30*/100	(Site Specific)	800*/1,000
TPH-o	2,000	(Site Specific)	500
Benzene (carcinogen)	0.03	(Site Specific)	5
Toluene	7	(Site Specific)	1,000
Ethylbenzene	6	(Site Specific)	700
Xylene	9	(Site Specific)	1,000
Total Lead	250	(Site Specific)	15

*When Benzene is present.

Table 2. The proposed air cleanup levels are:

Contaminants of Concern (COCs)	**Method B** Sub-Slab/Soil Gas Screening Levels ug/m^3	**Method B** Indoor/Air Cleanup Levels ug/m^3
Benzene (carcinogen)	10.7	0.321
Toluene	15,600	2,290
Ethylbenzene	15,200	457
Xylene	310	45.7
Total Lead	-	-
Naphthalene (carcinogen) (does not include 1-methyl and 2-methyl naphthalene)	2.45	0.0735
Total Petroleum Hydrocarbon (TPH)	4,700*	140
APH [EC5-8 Aliphatics]	90,000	2,700
APH [EC9-12 Aliphatics]	4,700	140
APH [EC9-10 Aromatics]	6,000	180

* Based on the current attenuation factor of 0.03.

2. POCs:

The proposed CULs must be met at the following POCs:

Soil-Direct Contact: For CULs based on human exposure via direct contact, the standard POC is: "*…throughout the site from the ground surface to fifteen feet below*

the ground surface." This is in compliance with WAC 173-340-740(6)(d) and represents a reasonable estimate of the depth of soil that could be excavated and distributed at the soil surface as a result of Site development activities.

Groundwater: For groundwater, the standard POC as established under WAC 173-340-720(8) is: "*…throughout the site from the uppermost level of the saturated zone extending vertically to the lowest most depth which could potentially be affected by the site.*"

Air: CULs need to be attained in the ambient air throughout the Site, including indoor air within the lateral and vertical inclusion zone (WAC 173-340-750[6]).

Analysis of the Cleanup

PLIA has concluded that **no further remedial action** is necessary at the Site. Our conclusion is based on the following analysis:

1. History and Characterization of the Site

PLIA has determined your characterization of the Site **was** sufficient to establish cleanup standards and select a cleanup action. The Site is described in the documents cited above and shown in Figures 1 and 2.

Conceptual Site Model (Exposure Pathways)

A conceptual site model is a description of how contamination at the Site can potentially come into contact with, and impact, a human or other ecological receptor.

i. Soil Direct Contact:

- Petroleum contaminated soil (PCS) at the Site was reportedly associated with three 1978-vintage underground storage tanks (USTs), two 1993-vintage USTs, and fuel conveyance piping and dispensers associated with a commercial fueling station. PCS was detected above MTCA Method A CULs in the form of TPH-g and BTEX within the depths (0' to 15' below ground surface [bgs]) that humans are most likely to come into contact (Table 1).

  Result: The direct contact exposure pathway existed at this Site. This means that PCS was in a place underground where it was likely that a human may come into contact with it when working (e.g., digging for a buried utility line).

ii. Groundwater:

- TPH-g and Benzene was detected above MTCA Method A CULs in excavation pit water during the "Gasoline Dispenser Excavation" in May 1993. Oil range petroleum hydrocarbons were detected above MTCA Method A CULs at reconnaissance sample location P17 in December 2019. A total of five groundwater monitoring wells were installed and sampled at the Site. TPH-d (in the form of diesel range and oil range petroleum hydrocarbons) were found to be above MTCA Method A CULs in monitoring well MW-05. However, a laboratory note indicated that the sample chromatographic pattern did not resemble the fuel standard used for quantification. When the sample extract was passed through a silica gel column (in attempt to remove organics not related to the petroleum) sample results were below MTCA Method A CULs (Table 2).

  Result: The soil to groundwater exposure pathway existed at this Site. This means that PCS may come into contact with, and leach into, groundwater that may be used for drinking water purposes.

iii. Air (Soil or Groundwater to Vapor):

- Several former and future building footprints are/were within the lateral inclusion zone (30') and vertical separation distance (15') of historical petroleum related detections above MTCA Method A CULs (Figure 2).

  Result: The air exposure pathway existed at this Site. This means that petroleum contamination underground may give off harmful vapors that could enter nearby commercial or residential structures.

iv. Surface Water:

- Not applicable for the Site. The nearest surface water is Totem Lake which is located approximately 1000' northeast of this Site.

  Result: The surface water exposure pathway did not exist at this Site. At this time, data does not suggest that surface water may be at risk for being impacted. This means that petroleum contamination has not spread to surface water.

Selection of Cleanup Action:

The conceptual site model (Section 1: i-iv above) details which exposure pathways existed prior to conducting cleanup activities at the Site. Cleanup actions performed at the Site must adequately address all known exposure pathways of concern in

order to satisfy the substantive requirements of MTCA. Cleanup actions taken, along with their effect on any known exposure pathways, are described in Section 2.

2. Cleanup of the Site:

PLIA has determined that the cleanup action(s) you performed meet(s) cleanup standards established for the Site. The following cleanup actions have been completed at the Site:

i. Soil:

- Three USTs (8,000-gallon and 12,000-gallon gasoline USTs and a 500-gallon waste oil UST of 1978 vintage) were removed in April 1993. Approximately 300 to 400 cubic yards of PCS were reportedly removed from the UST excavations. Inaccessible PCS remained at the Site following excavation and removal.
- Two USTs (a 10,000-gallon gasoline UST and a 5,000-gallon diesel UST of 1993 vintage) and associated fuel dispensing equipment were removed in 2013.
- An additional 270.16 tons of PCS was reportedly excavated and removed in September 2021.
- Confirmation soil sampling was performed to determine if all PCS above MTCA Method A CULs had been removed from the Site (Table 2).

Result: **The data indicate there is no longer an unacceptable risk of exposure from the soil direct contact exposure pathway at the Site.** The remedial action(s) removed the potential for soil with concentrations of petroleum above CULs to come into contact with humans or ecological receptors.

ii. Groundwater:

- The soil remedial action (and subsequent confirmation soil sampling) served to close the soil leaching to groundwater exposure pathway. The groundwater data from Site monitoring wells indicates that all contaminants of concern are below CULs at the Site.

Result: The data indicate there is no longer an unacceptable risk of exposure from the groundwater exposure pathway at this Site. The remedial action removed the potential for PCS above the CULs to come into contact with, and leach into, groundwater at the Site.

iii. Air (Soil or Groundwater to Vapor):

- Because soil and groundwater have been remediated to below MTCA

Method A CULs at the Site, the soil or groundwater to vapor exposure pathway is considered to be closed.

Result: The data indicate there is no longer an unacceptable risk of exposure from the soil or groundwater to vapor exposure pathway at this Site. The remedial action removed the potential for contaminated soil or groundwater to give off harmful vapors that could enter nearby commercial or residential structures.

Limitations of the Opinion

1. Opinion does not settle liability with the state.

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

- Change the boundaries of the Site.
- 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 the Office of the Attorney General and the Department of 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 the 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 equivalent. Courts make that determination (RCW 70A.305.080 and WAC 173-340-545).

3. State is immune from liability.

The state, PLIA, 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.

Termination of Agreement

Thank you for choosing to cleanup your Site under the PLIA Technical Assistance Program. This opinion terminates Project No. PNW179.

Contact Information

Thank you for choosing to clean up your Site in coordination with the PLIA Technical Assistance Program (TAP). If you have any questions about this opinion, please contact us by phone at 1-800-822-3905, or by email at pliamail@plia.wa.gov.

Sincerely,

DocuSigned by:
Justin Woerth
37703CDC1AC84D4...

State of Washington
21035012
Licensed Geologist
Justin Woerth

DocuSigned by:
Ulysses Cooley Jr.
569D5AC8B883494...

State of Washington
Hydrogeologist
1000
Licensed Geologist
Ulysses Cooley Jr.

Justin Woerth, L.G.
Site Manager

Ulysses Cooley Jr., L.HG., L.G
Hydrogeologist

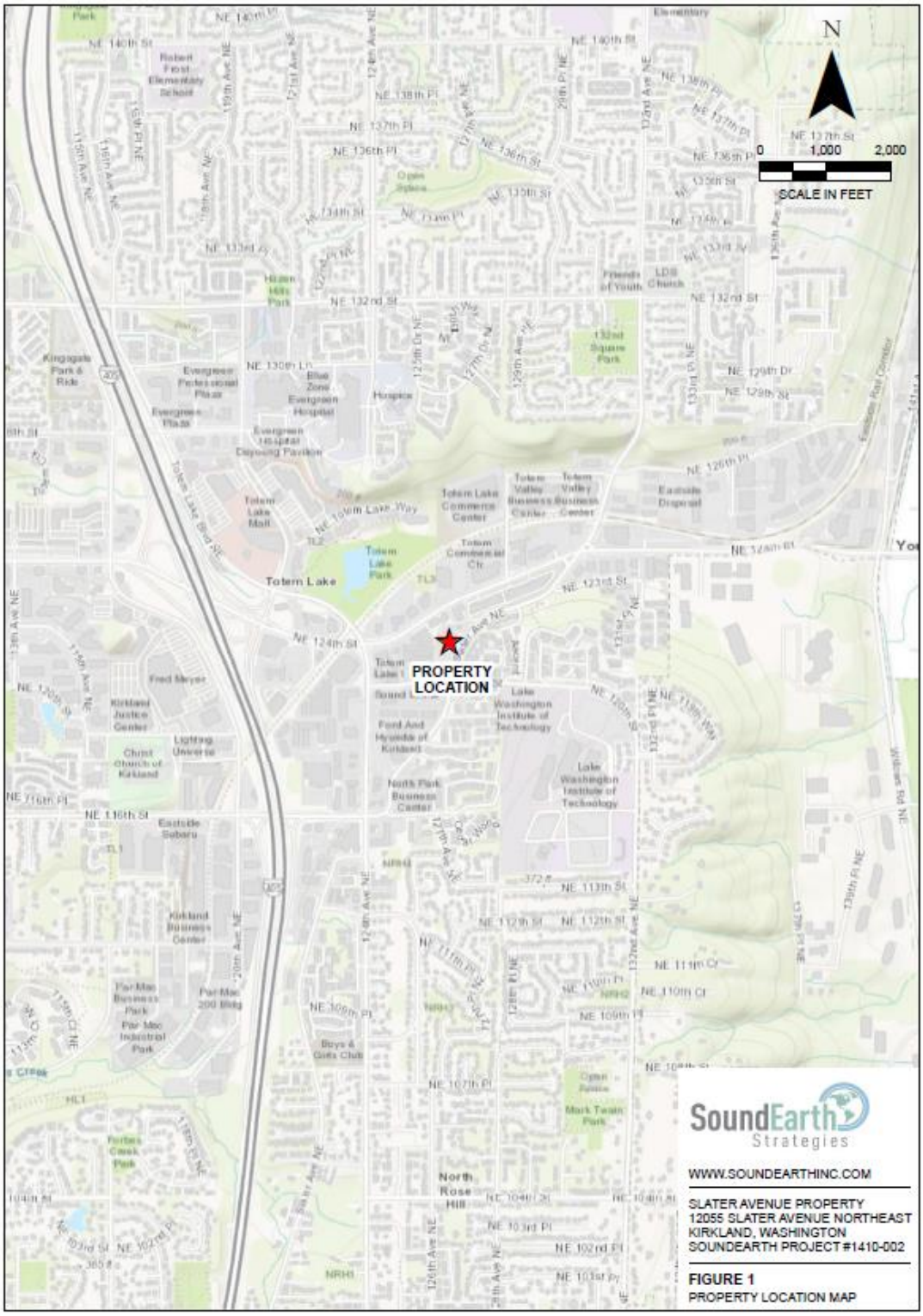
Enclosure A: Figure 1: Vicinity Map
Figure 2: Site Map
Table 1: Soil Data
Table 2: Groundwater Data

cc: Mr. Shon Finch, Fairfield Residential (by email)
Mr. Levi Fernandes, SoundEarth Strategies, Inc. (by email)
Ms. Kristin Evered, PLIA (by email)
Ms. Carrie Pederson, PLIA (by email)
Mr. Tyler Betz, PLIA (by email)

Enclosure A:

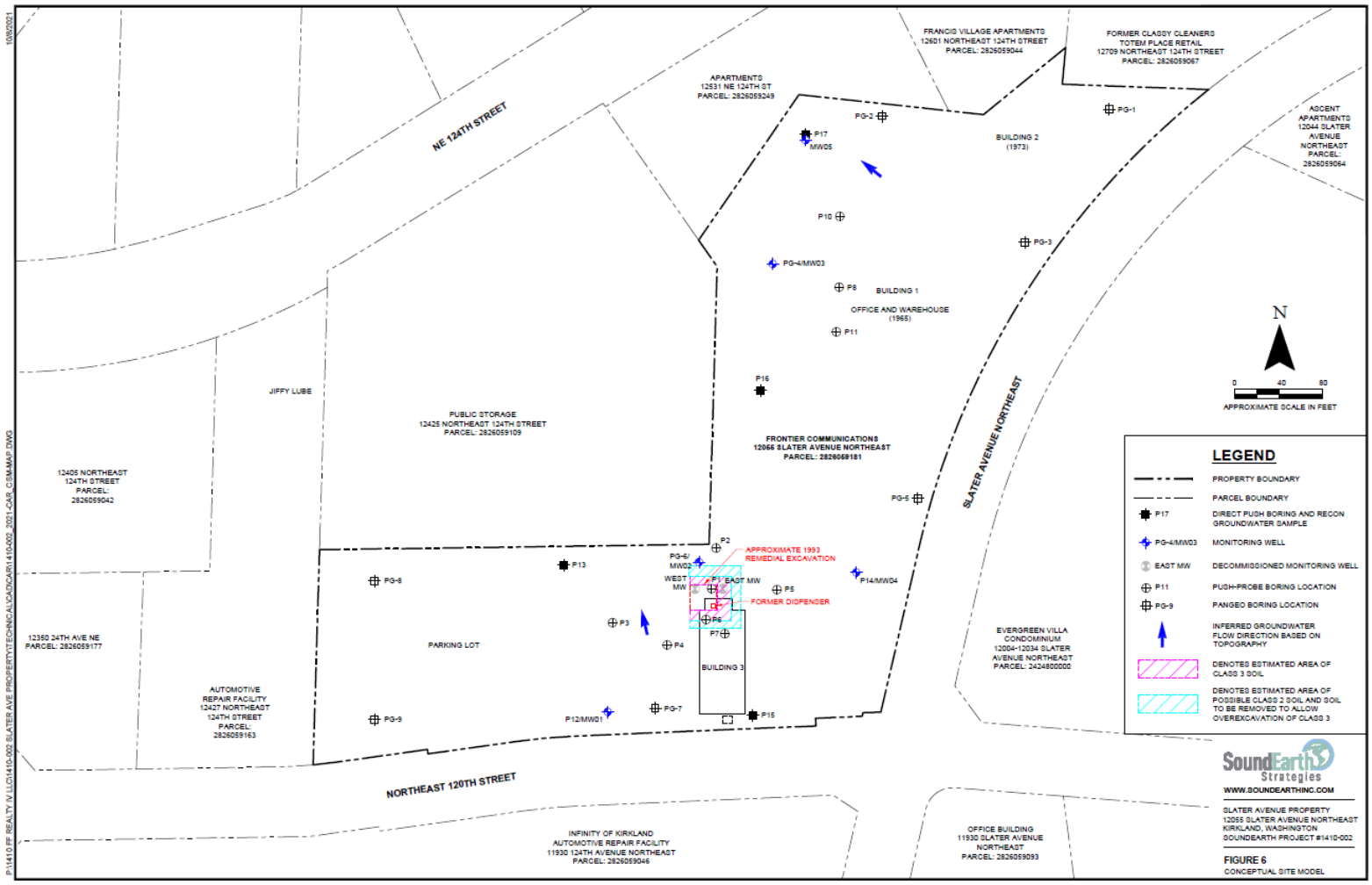
Slater Ave. Property - GTE Vehicle Center Site
TAP Project No. PNW179

Figure 1: Vicinity Map



Source: Cleanup Action Report, Sound Earth Strategies, 2021.

Figure 2: Site Map



Source: Cleanup Action Report, Sound Earth Strategies, 2021.

Table 1: Soil Data

Table 1
Soil Analytical Results for TPH and BTEX
Slater Avenue Property
12055 Slater Avenue Northeast
Kirkland, Washington

Excavation Area / Boring ID	Sample ID	Sampled By	Date Sampled	Location / Depth (feet bgs)	Analytical Results (milligrams per kilogram)							
					GRPH[1]	DRPH[2]	ORPH[2]	ORPH[2] with silica gel[3]	Benzene[4]	Toluene[4]	Ethylbenzene[4]	Total Xylenes[4]
1993 AGI 8,000-Gallon UST Excavation												
8,000-Gallon UST Excavation	S1	AGI	04/10/93	Bottom	<20	<50	<100	--	--	--	--	--
	S2			Sidewall	<20	<50	<100	--	--	--	--	--
	S3			Sidewall	<20	<50	<100	--	--	--	--	--
	S4			Stockpile	<20	<50	<100	--	--	--	--	--
1993 AGI 8,000-Gallon UST Excavation												
12,000-Gallon UST Excavation	S1	AGI	04/15/93	Bottom	<20	<50	86	--	--	--	--	--
	S2			Bottom	<20	<50	<100	--	--	--	--	--
	S3		04/16/93	Sidewall	<20	<50	<100	--	--	--	--	--
	S4		04/15/93	Sidewall	<20	<50	<100	--	--	--	--	--
	S5			Stockpile	<20	<50	<100	--	--	--	--	--
1993 AGI 8,000-Gallon UST Excavation												
500-Gallon UST Excavation	SS1	AGI	04/16/93	Bottom	<20	<50	<100	--	--	--	--	--
	SS2			Sidewall	<20	<50	<100	--	--	--	--	--
	SS3			Sidewall	<20	<50	<100	--	--	--	--	--
	SS4			Stockpile	<20	<50	<100	--	--	--	--	--
	SS5			Piping	<20	<50	<100	--	--	--	--	--
1993 AGI Gasoline Dispenser Excavation												
Gasoline Dispenser Excavation	DS1	AGI	04/27/93	Bottom	<7	--	--	--	--	--	--	--
	DS2		04/27/93	Building Alcove	5,900	--	--	--	--	--	--	--
	DS3		04/29/93	Bottom	<7	--	--	--	<0.059	<0.059	<0.059	<0.059
	DS4		04/29/93	Bottom	<7	--	--	--	<0.059	<0.059	<0.059	<0.059
	DS5		04/29/93	Bottom	<7	--	--	--	<0.059	<0.059	<0.059	<0.059
	DS6		04/30/93	Bottom	<7	--	--	--	<0.059	<0.059	<0.059	0.17
	DS7		04/30/93	Stockpile	2,500	--	--	--	<0.059	13	6.6	72
	DS8		05/02/93	Stockpile	<7	--	--	--	--	--	--	--
2018 SoundEarth Subsurface Investigation												
P1	P1-4	SoundEarth	02/21/18	4	<5	<50	<250	--	<0.02	<0.02	<0.02	<0.06
	P1-8			8	11	100[x]	1,200[x]	--	<0.02	<0.02	0.034	0.16
P2	P2-8			8	<5	<50	<250	--	<0.02	<0.02	<0.02	<0.06
	P2-12			12	<5	--	--	--	<0.02	<0.02	<0.02	<0.06
P3	P3-13			13	<5	<50	<250	--	<0.02	<0.02	<0.02	<0.06
P4	P4-8			8	<5	<50	690	--	<0.03	<0.05	<0.05	<0.2
P5	P5-8			8	<5	<50	<250	--	<0.02	<0.02	<0.02	<0.06
P6	P6-4			4	<5	--	--	--	<0.02	<0.02	<0.02	<0.06
	P6-8			8	<5	<50	<250	--	<0.02	<0.02	<0.02	<0.06
P7	P7-8			8	<5	<50	<250	--	<0.02	<0.02	<0.02	<0.06
P8	P8-8			8	<5	<50	<250	--	<0.02	<0.02	<0.02	<0.06
	P8-13			13	<5	--	--	--	<0.02	<0.02	<0.02	<0.06
P10	P10-8			8	<5	--	--	--	<0.02	<0.02	<0.02	<0.06
PG-7	PG7-05		03/02/18	5	--	<50	<250	--	--	--	--	--
	PG7-10			10	--	69	<250	--	--	--	--	--
PG-4	PG4-05			5	<5	--	--	--	<0.02	<0.02	<0.02	<0.06
	PG4-10			10	<5	--	--	--	<0.02	<0.02	<0.02	<0.06
MTCA Cleanup Level for Soil[5]					30	2,000	2,000	2,000	0.03	7	6	9

Source: Cleanup Action Report, Sound Earth Strategies, 2021.

Table 1 Continued: Soil Data

Table 1
Soil Analytical Results for TPH and BTEX
Slater Avenue Property
12055 Slater Avenue Northeast
Kirkland, Washington

Excavation Area / Boring ID	Sample ID	Sampled By	Date Sampled	Location / Depth (feet bgs)	Analytical Results (milligrams per kilogram)							
					GRPH[1]	DRPH[2]	ORPH[2]	ORPH[2] with silica gel[3]	Benzene[4]	Toluene[4]	Ethylbenzene[4]	Total Xylenes[4]
2019-2020 SoundEarth Subsurface Investigation												
P12	P12-05	SoundEarth	12/19/19	5	<5	<50	<250	--	<0.02	<0.02	<0.02	<0.06
	P12-15		12/19/19	15	<5	<50	1,200[x]	480[x]	<0.02	<0.02	<0.02	<0.06
	P12-25		12/19/19	25	<5	<50	<250	--	<0.02	<0.02	<0.02	<0.06
P13	P13-05		12/19/19	5	<5	<50	<250	--	<0.02	<0.02	<0.02	<0.06
	P13-15		12/19/19	15	<5	<50	<250	--	<0.02	<0.02	<0.02	<0.06
	P13-25		12/19/19	25	<5	<50	<250	--	<0.02	<0.02	<0.02	<0.06
P14	P14-05		12/19/19	5	<5	<50	<250	--	<0.02	<0.02	<0.02	<0.06
	P14-15		12/19/19	15	<5	<50	<250	--	<0.02	<0.02	<0.02	<0.06
	P14-23		12/19/19	23	<5	<50	<250	--	<0.02	<0.02	<0.02	<0.06
P15	P15-05		12/19/19	5	<5	<50	<250	--	<0.02	<0.02	<0.02	<0.06
	P15-15		12/19/19	15	<5	<50	<250	--	<0.02	<0.02	<0.02	<0.06
	P15-25		12/19/19	25	<5	<50	470[x]	410[x]	<0.02	<0.02	<0.02	<0.06
P16	P16-05		12/20/19	5	<5	<50	<250	--	<0.02	<0.02	<0.02	<0.06
	P16-15		12/20/19	15	<5	<50	<250	--	<0.02	<0.02	<0.02	<0.06
	P16-25		12/20/19	25	<5	<50	<250	--	<0.02	<0.02	<0.02	<0.06
P17	P17-05		12/20/19	5	<5	<50	<250	--	<0.02	<0.02	<0.02	<0.06
	P17-15		12/20/19	15	<5	<50	<250	--	<0.02	<0.02	<0.02	<0.06
	P17-25		12/20/19	25	<5	<50	<250	--	<0.02	<0.02	<0.02	<0.06
MTCA Cleanup Level for Soil[5]					**30**	**2,000**	**2,000**	**2,000**	**0.03**	**7**	**6**	**9**

NOTES:
Red denotes concentration exceeds MTCA cleanup level for soil.
Bold denotes laboratory reporting limit exceeds the applicable MTCA cleanup level.
Sample analyses conducted by Analytical Technologies, Inc., of Renton, Washington or Friedman & Bruya, Inc., of Seattle, Washington.
[1]Analyzed by Method NWTPH-Gx.
[2]Analyzed by Method NWTPH-Dx.
[3]Sample extracts passed through a silica gel column prior to analysis.
[4]Analyzed by EPA Method 8021B.
[5]MTCA Cleanup Regulation, Chapter 173-340-900 of WAC, Table 740-1 Method A Cleanup Levels for Soil, Unrestricted Land Uses, revised November 2007.
Laboratory Note:
[x]The sample chromatographic pattern does not resemble the fuel standard used for quantitation.

-- = not analyzed/not applicable
< = not detected at a concentration exceeding the laboratory reporting limit
AGI = Applied Geotechnology, Inc.
bgs = below ground surface
BTEX = benzene, toluene, ethylbenzene, and total xylenes
DRPH = diesel-range petroleum hydrocarbons
EPA = US Environmental Protection Agency
GRPH = gasoline-range petroleum hydrocarbons
MTCA = Washington State Model Toxics Control Act
N/A = not applicable
NWTPH = Northwest Total Petroleum Hydrocarbon
ORPH = oil-range petroleum hydrocarbons
SoundEarth = SoundEarth Strategies, Inc.
TPH = total petroleum hydrocarbons
UST = underground storage tank
WAC = Washington Administrative Code

Source: Cleanup Action Report, Sound Earth Strategies, 2021.

Table 1 Continued: Soil Data

Table 7
Remedial Excavation:
Confirmation Soil Analytical Results for TPH and BTEX
Slater Avenue Property
12055 Slater Avenue Northeast
Kirkland, Washington

Test Pit/ Excavation/ Stockpile ID	Figure ID	Sample ID	Date Sampled	Depth (feet bgs)	Analytical Results (milligrams per kilogram)						
					GRPH[3]	DRPH[2]	ORPH[2]	Benzene[4]	Toluene[4]	Ethylbenzene[4]	Total Xylenes[4]
Test Pit											
TP03	1	TP03-NSW01-07	08/25/21	7	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
TP03	2	TP03-NSW02-07	08/25/21	7	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
TP03	3	TP03-NSW03-07	08/25/21	7	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
TP03	4	TP03-WSW01-07	08/25/21	7	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
TP03	5	TP03-WSW02-07	08/25/21	7	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
TP03	6	TP03-ESW01-07	08/25/21	7	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
TP03	7	TP03-ESW02-07	08/25/21	7	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
Remedial Excavation											
EX01	8	Ex01-SSW02-05	08/30/21	5	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
EX01	9	Ex01-SSW02-02	08/30/21	2	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
EX01	10	Ex01-SSW03-05	08/30/21	5	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
EX01	11	Ex01-BTM02-09	08/30/21	9	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
EX01	12	Ex01-BTM03-09	08/30/21	9	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
EX01	13	Ex01-SSW01-05	08/30/21	5	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
EX01	14	Ex01-BTM01-10	08/30/21	10	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
EX01	15	Ex01-WSW01-05	08/30/21	5	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
EX01	16	EX01-ESW01-05	08/31/21	5	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
EX01	17	EX01-ESW02-05	08/31/21	5	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
EX01	18	EX01-BTM04-09	08/31/21	9	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
EX01	19	EX01-ESW03-05	08/31/21	5	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
EX01	20	EX01-BTM05-09	08/31/21	9	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
EX01	21	EX01-NSW01-05	08/31/21	5	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
EX01	22	EX01-NSW02-05	08/31/21	5	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
EX01	23	EX01-NSW03-05	08/31/21	5	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
EX01	24	EX01-BTM06-09	08/31/21	9	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
EX01	25	EX01-BTM07-09	08/31/21	9	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
EX01	26	EX01-WSW02-05	08/31/21	5	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
EX01	27	EX01-IWSW01-04	08/31/21	4	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
EX01	28	EX01-IWSW01-08	08/31/21	8	<5	88x	510x	<0.02	<0.02	<0.02	<0.06
EX01	29	EX01-ISSW01-04	08/31/21	4	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
EX01	30	EX01-ISSW01-08	08/31/21	8	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
EX01	31	EX01-INSW01-04	08/31/21	4	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
EX01	32	EX01-INSW01-08	08/31/21	8	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
Stockpile											
SP01	33	SP01-01	08/31/21	--	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
SP01	34	SP01-02	08/31/21	--	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
SP01	35	SP01-03	08/31/21	--	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
SP01	36	SP01-04	08/31/21	--	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
SP01	37	SP01-05	08/31/21	--	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
SP03	38	SP03-01	08/31/21	--	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
SP03	39	SP03-02	08/31/21	--	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
SP03	40	SP03-03	08/31/21	--	<5	<50	<250	<0.02	<0.02	<0.02	<0.06
MTCA Cleanup Level for Soil[4]					30	2,000	2,000	0.03	7	6	9

NOTES:
Red denotes concentration exceeds MTCA cleanup level for soil.
Sample analysis conducted by Friedman & Bruya, Inc. of Seattle, Washington.
[1]Analyzed by Method NWTPH-Gx.
[2]Analyzed by Method NWTPH-Dx.
[3]Analyzed by EPA Method 8021B.
[4]MTCA Cleanup Regulation, Chapter 173-340-900 of WAC, Table 740-1 Method A Cleanup Levels for Soil, Unrestricted Land Uses, revised November 2007.
Laboratory Notes:
a=The sample chromatographic pattern does not resemble the fuel standard used for quantitation.

-- = not analyzed/not applicable
< = not detected at a concentration exceeding the laboratory reporting limit
bgs = below ground surface
BTEX = benzene, toluene, ethylbenzene, and total xylenes
DRPH = diesel-range petroleum hydrocarbons
EPA = US Environmental Protection Agency
GRPH = gasoline-range petroleum hydrocarbons
MTCA = Washington State Model Toxics Control Act
NWTPH = Northwest Total Petroleum Hydrocarbon
ORPH = oil-range petroleum hydrocarbons
TPH = total petroleum hydrocarbons

Source: Cleanup Action Report, Sound Earth Strategies, 2021.

Table 2: Groundwater Data

SoundEarth Strategies

Table 6
Groundwater Analytical Results for TPH and BTEX
Slater Avenue Property
12055 Slater Avenue Northeast
Kirkland, Washington

Excavation Area / Well ID	Sample ID	Sampled By	Date Sampled	Analytical Results (micrograms per liter)								
				GRPH[1]	DRPH[2]	DRPH[2] with silica gel[3]	ORPH[2]	ORPH[2] with silica gel[3]	Benzene[4]	Toluene[4]	Ethylbenzene[4]	Total Xylenes[4]
1993 AGI Gasoline Dispenser Excavation												
Gasoline Dispenser Excavation	DS9[5]	AGI	05/05/93	2,700	--	--	--	--	31	41	<2.5	180
SoundEarth 2018 Subsurface Investigation												
MW02	MW02-20180309	SoundEarth	03/09/18	<100	<50	--	<250	--	<1	<1	<1	<3
MW03	MW03-20180309			<100	<50	--	<250	--	<1	<1	<1	<3
SoundEarth 2019 Reconnisance Groundwater Samples												
P13	P13-20191219	SoundEarth	12/19/19	<100	58[x]	<50	<250	<250	<1	<1	<1	<3
P15	P15-20191219			<100	69[x]	<50	590	420	<1	<1	<1	<3
P16	P16-20191220		12/20/19	<100	65[x]	<50	320	<250	<1	<1	<1	<3
P17	P17-20191220			<100	750[x]	100[x]	1,500	1,100	<1	<1	<1	<3
SoundEarth 2019 Groundwater Sampling												
MW01	MW01-20191226	SoundEarth	12/26/19	<100	<50	--	<250	--	<1	<1	<1	<3
MW02	MW02-20190612		06/12/19	<100	77[x]	<50	<250	<250	<1	<1	<1	<3
	MW02-20191226		12/26/19	<100	<50	--	<250	--	<1	<1	<1	<3
	MW99-20191226 (DUP)		12/26/19	<100	<50	--	<250	--	<1	<1	<1	<3
MW03	MW03-20191226		12/26/19	<100	<50	--	<250	--	<1	<1	<1	<3
MW04	MW04-20191226		12/26/19	<100	100[x]	<50	<250	<250	<1	<1	<1	<3
SoundEarth 2020 Groundwater Sampling												
MW01	MW01-20200325	SoundEarth	03/25/20	<100	<50	--	<250	--	<1	<1	<1	<3
MW02	MW02-20200325		03/25/20	<100	<50	--	<250	--	<1	<1	<1	<3
	MW99-20200325 (DUP)		03/25/20	<100	<60	--	<300	--	<1	<1	<1	<3
MW03	MW03-20200325		03/25/20	<100	<50	--	<250	--	<1	<1	<1	<3
MW04	MW04-20200325		03/25/20	<100	<50	--	<250	--	<1	<1	<1	<3
MW05 (P17 replacement)	MW05-20200115		01/15/20	<100	<50	--	<250	--	<1	<1	<1	<3
	MW05-20200325		03/25/20	<100	160[x]	<50	490[x]	<250	<1	<1	<1	<3
MTCA Cleanup Level for Groundwater[6]				800	500		500		5	1,000	700	1,000

NOTES:
Red denotes concentration exceeds MTCA cleanup level for groundwater.
Sample analysis conducted by Analytical Technologies, Inc., of Renton, Washington or Friedman & Bruya, Inc., of Seattle, Washington.
[1]Analyzed by Method NWTPH-Gx.
[2]Analyzed by Method NWTPH-Dx.
[3]Sample extracts passed through a silica gel column prior to analysis.
[4]Analyzed by EPA Method 8021B.
[5]Shallow perched water sampled from open remedial excavation.
[6]MTCA Cleanup Regulation, Chapter 173-340-900 of WAC, Table 720-1 Method A Cleanup Levels for Groundwater, revised November 2007.
Laboratory Note:
[x]The sample chromatographic pattern does not resemble the fuel standard used for quantitation.

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BTEX = benzene, toluene, ethylbenzene, and total xylenes
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MTCA = Washington State Model Toxics Control Act
NWTPH = Northwest Total Petroleum Hydrocarbon
ORPH = oil-range petroleum hydrocarbons
SoundEarth = SoundEarth Strategies, Inc.
TPH = total petroleum hydrocarbons
WAC = Washington Administrative Code

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Source: Cleanup Action Report, Sound Earth Strategies, 2021.